
State of Minnesota

Northland Community and Technical College

Affirmative Action Plan

August 2014 – August 2016

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Individuals with disabilities may request this document in alternative formats by contacting Kristi Lane 218-683-8631 or through their preferred relay service.

Northland Community and Technical College 2014 – 2016 Affirmative Action Plan

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I. EXECUTIVE SUMMARY

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Review revealed underutilization of the following protected group(s) in the following EEO-4 job categories:

Table 1.

EEO-4 Job Categories	PROTECTED GROUPS		
	Women	Racial/Ethnic Minorities	Persons With Disabilities
Officials/Administrators			X
Professionals	X	X	X
Technicians	X		
Paraprofessionals			
Office/Clerical		X	
Skilled Craft			
Service Maintenance	X	X	

Once approved, information about how to obtain or view a copy of this plan will be provided to every employee of the college. Our intention is that every employee to is aware of Northland Community and Technical College’s commitments to affirmative action and equal employment opportunity. The plan will also be posted on the college’s website and maintained in the Human Resources/Affirmative Action Office.

This affirmative action plan meets the requirements as set forth by Minnesota Management & Budget, and contains affirmative action goals and timetables, as well as reasonable and sufficiently assertive hiring and retention methods for achieving these goals.

Kristin Law

7/31/14

Affirmative Action Officer

(date)

Becky Lindseth

7/31/14

Human Resources Director or Designee

(date)

Anne K. Tenite

7/31/14

College President

(date)

II. STATEMENT OF COMMITMENT

This statement reaffirms **Northland Community and Technical College** is committed to Minnesota's statewide affirmative action efforts and providing equal employment opportunity to all employees and applicants for employment in accordance with equal opportunity and affirmative action laws.

I affirm my personal and official support of these policies which provide that:

- Discrimination against applicants or employees on the basis of race, color, creed, religion, national origin, sex, sexual orientation, disability, age, marital status, membership or activity in a local human rights commission, or status with regard to public assistance will not be tolerated.
- This college is committed to the implementation of the affirmative action policies, programs, and procedures included in this plan to ensure that employment practices are free from discrimination. Employment practices include but are not limited to, the following: hiring, promotion, demotion, transfer, recruitment or recruitment advertising, layoff, disciplinary action, termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship. We will provide reasonable accommodation to applicants and employees with disabilities.
- This college will continue to actively promote a program of affirmative action, wherever minorities, women, and persons with disabilities are underrepresented in the workforce; and work to retain all qualified, talented employees, including protected group employees.
- This college will evaluate its efforts, including those of its managers and supervisors in promoting equal opportunity and achieving affirmative action objectives contained herein. In addition, the college will expect all employees to perform their job duties in a manner that promotes equal opportunity for all.

It is the college's policy to provide an employment environment free of any form of discriminatory harassment as prohibited by federal, state, and local human rights laws. I strongly encourage suggestions as to how we may improve. We strive to provide equal employment opportunities and the best possible service to all Minnesotans.



7/31/14

College President

(date)

III. PERSONS RESPONSIBLE FOR DIRECTING/IMPLEMENTING THE AFFIRMATIVE ACTION PLAN

A. President

Anne Temte, President
218-793-2466

Responsibilities:

The President is responsible for the establishment of an affirmative action plan that complies with all federal and state laws and regulations.

Duties:

The duties of the President shall include, but not be limited to the following:

- Appoint the affirmative action officer or designee and include accountability for the administration of the college's affirmative action plan in his or her position description.
- To take action, if needed, on complaints of discrimination.
- To ensure the affirmative action plan is effectively communicated to all employees on an annual basis.
- Make decisions and changes in policy, procedures, or accommodations as needed to facilitate effective affirmative action and equal employment opportunity.
- To actively promote equal opportunity employment.
- Require all college managers and supervisors include responsibility for supporting affirmative action, diversity and/or cultural responsiveness in their position descriptions and annual objectives;

Accountability:

The President is accountable directly to the Chancellor and indirectly to the MMB Commissioner on matters pertaining to equal opportunity and affirmative action.

B. Affirmative Action Officer/Equal Opportunity Consultant or Designee(s)
Kristi Lane, Assistant Director of Human Resources
218-683-8631

Responsibilities:

The Affirmative Action Officer (“AAO”) is responsible for implementation of college-wide affirmative action and equal opportunity program, and oversight of the college’s compliance with equal opportunity and affirmative action laws.

Duties:

The duties of the AAO shall include, but not limited to the following:

- Preparation and oversight of college affirmative action and equal opportunity plan, including development and setting of college-wide goals;
- Monitoring college compliance and fulfill all affirmative action reporting requirements;
- Inform college head of progress in affirmative action and equal opportunity and report potential concerns;
- Review of the College’s Affirmative Action and Equal Opportunity Plan at least annually, and provide updates as appropriate;
- Provide an college-wide perspective on issues relating to affirmative action and equal opportunity and assist in the identification and development of effective solutions in problem areas related to affirmative action and equal opportunity;
- Identify opportunities for infusing affirmative action and equal opportunity into the college’s considerations, policies and practices;
- Participate in and/or develop strategies to recruit protected class persons for employment, promotion and training opportunities;
- State current on changes to equal opportunity and affirmative action laws and interpretation of the laws.
- Providing consultation and/or training to hiring managers and supervisors regarding recruitment, selection, and retention best practices and resources, progress on hiring goals, providing reasonable accommodations, and other opportunities for improvement; and

- Serving as the college liaison with MMB's Office of Equal Opportunity & Diversity and enforcement agencies .

Accountability:

The AAO is accountable directly to President on matters pertaining to affirmative action and equal opportunity.

C. Americans with Disabilities Act Coordinator or Designee

Becky Lindseth, Executive Director of Administrative Services (218-793-2476)

Director of Learning Services

Ellen Brehmer, Learning Services Coordinator (218-793-2382)

Responsibilities:

The Americans with Disabilities Act ("ADA") Coordinator is responsible for the oversight of the college's compliance with the Americans with Disabilities Act ("ADA") Title I – Employment and Title II – Public Services, in accordance with the ADA - as amended, the Minnesota Human Rights Act, and Executive Order 96-09.

Duties:

The duties of the ADA Coordinator shall include, but not limited, to the following:

- Provide guidance, coordination, and direction to college management with regard to the ADA in the development and implementation of college policy, procedures, and practices to ensure college employment practices and programs are accessible and nondiscriminatory.
- Provide training, technical guidance, and consultation to college management and staff on compliance and best practices with regard to hiring and retention of individuals with disabilities as well as the provision of reasonable accommodations to employees and job applicants; and
- Track and facilitate requests for reasonable accommodations for job applicants and employees, as well as members of the public accessing college services, and reports reasonable accommodations annually to MMB.

Accountability:

The ADA Coordinator reports directly to the President.

D. Human Resources Director or Designee

**Becky Lindseth, Executive Director of Administrative Services/HR Director
218-793-2476**

Responsibilities:

The Human Resources (“HR”) Director is responsible for ensuring equitable and uniform administration of all personnel policies including taking action to remove barriers to equal employment opportunity with the college.

Duties:

The duties of the HR Director include, but are not limited, to the following:

- Provide leadership to HR staff and others ensure personnel decision-making processes adhere to equal opportunity and affirmative action principles;
- Ensure, to the extent possible, development and utilization of selection criteria that is objective, uniform, and job-related;
- Initiate and report on specific program objectives contained in the affirmative action plan;
- Ensure pre-hire review process is implemented and receives support from hiring managers and supervisors;
- Include the AAO in the decision-making process regarding personnel actions involving protected group members, including hiring, promotion, disciplinary actions, reallocation, transfer and termination, and department and division-wide classification studies;
- Include responsibility statements for affirmative action/equal employment opportunity in position descriptions and annual performance objectives;
- Assist in recruitment and retention of protected class persons, and notify managers and supervisors of existing disparities;
- Make available to the AAO and ADA Coordinator all necessary records and data necessary to perform duties related to equal opportunity and affirmative action.

Accountability:

The Human Resources Director reports directly to the President.

E. Directors, Managers and Supervisors

Responsibilities:

Directors, Managers, and Supervisors are responsible for implementation of equal opportunity and affirmative action within their respective areas of supervision and compliance with the college's affirmative action programs and policies to ensure fair and equal treatment of all applicants and employees.

Duties:

The duties of directors, managers, and supervisors shall include, but not be limited to, the following:

- To assist the AAO in identifying and resolving problems and eliminating barriers which inhibit equal employment opportunity;
- To communicate the college's affirmative action policy to assigned staff;
- To carry out supervisory responsibilities in accordance with the equal employment opportunity and affirmative action policies embodied in this plan;
- To maintain a consistent standard within the workforce so that employees are evaluated, recognized, developed and rewarded on a fair and equitable basis;
- To include responsibility statements for affirmative action/equal opportunity in staff position descriptions;
- To provide a positive and inclusive work environment; and
- To refer complaints of discrimination to the appropriate parties.

Accountability:

Directors, managers, and supervisors are accountable directly to their designated supervisor and indirectly to the President.

F. All Employees

Responsibilities:

All employees are responsible for conducting themselves in accordance with the college's equal opportunity and affirmative action plan and policies.

Duties:

The duties of all employees shall include, but are not limited, to the following:

- Exhibit an attitude of respect, courtesy and cooperation towards fellow employees and the public.
- Refrain from any actions that would adversely affect the performance of a coworker with respect to their race, color, creed, religion, national origin, sex, marital status, public assistance, disability, genetic information, sexual orientation, or membership in a local human rights commission.

Accountability:

Employees are accountable to their designated supervisor and indirectly to the President.

IV. COMMUNICATION OF THE AFFIRMATIVE ACTION PLAN

The following information describes the methods that the college takes to communicate the Affirmative Action Plan to employees and the general public:

A. Internal Methods of Communication

- A memorandum detailing the location of the affirmative action plan and the responsibility to read, understand, support and implement equal opportunity and affirmative action will be sent via e-mail from institution leadership or alternatively, the AAO, to all staff on an annual basis.
- The college's affirmative action plan is available to all employees on the college's internal website at <http://www.northlandcollege.edu/about-northland/offices/hr/docs/affirmative-action-plan.pdf> or in print copy to anyone who requests it. As requested, the college will make the plan available in alternative formats.
- Nondiscrimination and equal opportunity statements and posters are prominently displayed and available in areas frequented and accessible to employees.

B. External Methods of Communication

- The college's affirmative action plan is available on the college's external website at <http://www.northlandcollege.edu/about-northland/offices/hr/docs/affirmative-action-plan.pdf> or in print copy to anyone who requests it. As requested, the college will make the plan available in alternative formats.

- The college's web site home page, college letterhead, publications, and all job postings, will include the statement "an equal opportunity employer. "
- Nondiscrimination and equal opportunity statements and posters are prominently displayed and available in areas frequented by and accessible to members of the public. Examples of posters displayed include: EEO is the law, Employee Rights under the Fair Labor Standards Act, and the ADA Notice to the Public.

V. STATEWIDE POLICY PROHIBITING DISCRIMINATION AND HARASSMENT

It is the policy of the of the State of Minnesota to prohibit harassment of its employees based on race, color, creed, religion, national origin, sex, marital status, status with regard to public assistance, membership or activity in a local human rights, disability, sexual orientation, or age. This prohibition with respect to harassment includes both overt acts of harassment and those acts that create a negative work environment. Any employee subjected to such harassment should file a complaint internally with the college's Affirmative Action Officer designee. If the employee chooses, s/he may file a complaint externally with the Minnesota Department of Human Rights, the Equal Employment Opportunity Commission, or through other legal channels. These agencies have time limits for filing complaints, so individuals should contact the agencies for more information. In extenuating circumstances, the employee should contact the State Affirmative Action Program Coordinator in the Office of Equal Opportunity & Diversity at Minnesota Management & Budget for information regarding the filing of a complaint. Any unintentional or deliberate violation of this policy by an employee will be cause for appropriate disciplinary action.

Each employee is responsible for the application of this policy. This includes initiating and supporting programs and practices designed to develop understanding, acceptance, commitment, and compliance within the framework of this policy. All employees must be informed that harassment is unacceptable behavior. The Affirmative Action Officer designee will be expected to keep the Northland Community and Technical College and its employees apprised of any changes in the law or its interpretation regarding this form of discrimination. The Affirmative Action Officer designee is also responsible for:

1. Notifying all employees, and orienting each new employee who is hired, of this policy; and employees and applicants
2. Informing all employees of the complaint procedure and ensuring that all complaints will be investigated promptly and carefully.

Definitions

Discriminatory harassment is any behavior based on protected class status which is not welcome, which is personally offensive, which, therefore, may effect morale and interfere with the employee's ability to perform. For example, harassment based on national origin has been defined by the U.S. Equal Employment Opportunity Commission as "Ethnic slurs and other verbal or physical conduct relating to an individual's national origin."

Sexual harassment has also been specifically defined by the Minnesota Human Rights Act, which states in regard to employment, that:

"Sexual harassment" includes unwelcome sexual advances, requests for sexual favors, sexually motivated physical contact or other verbal or physical conduct or communication of a sexual nature when: (1) submission to that conduct or communication is made a term or condition, either explicitly or implicitly, of obtaining employment; (2) submission to or rejection of that conduct or communication by an individual is used as a factor in decision affecting that individual's employment; or (3) that conduct or communication has the purpose or effect of substantially interfering with an individual's employment, and in the case of employment, the employer knows or should know of the existence of the harassment and fails to take timely and appropriate action.

It is possible for discriminatory harassment to occur: 1) among peers or coworkers, 2) between managers and subordinates, or 3) between employees and members of the public. Employees who experience discriminatory harassment should bring the matter to the attention of the Northland Community and Technical College's Affirmative Action Officer designee. In fulfilling our obligation to maintain a positive and productive work environment, the Affirmative Action Officer designee and all employees are expected to address or report any suspected harassment or retaliation.

Varying degrees of discriminatory harassment violations can occur and require varying levels of progressive discipline. Individuals who instigate harassment are subject to serious disciplinary actions up to and including suspension, demotion, transfer, or termination. Additionally, inappropriate behaviors that do not rise to the level of discriminatory harassment, but are none the less disruptive, should be corrected early and firmly in the interests of maintaining a barrier-free work place. Individuals who participate in inappropriate behaviors at work are also subject to disciplinary actions.

Any employee or applicant who believes that she/he has experienced discrimination or harassment based on his/her race, color, creed, religion, national origin, sex, marital status, status with regard to public assistance, membership or activity in a local human rights commission, disability, sexual orientation, or age may file a complaint of discrimination.

Complaints of discrimination or harassment can be filed using the internal discrimination complaint procedure included in this affirmative action plan.

VI. COMPLAINT PROCEDURE FOR PROCESSING COMPLAINTS OF ALLEGED HARASSMENT/DISCRIMINATION

The Northland Community and Technical College has established the following discrimination complaint procedure to be used by all employees and applicants. Coercion, reprisal, or intimidation against anyone filing a complaint or serving as a witness under this procedure is prohibited.

Responsibility of Employees

All employees shall respond promptly to any and all requests by the Affirmative Action Officer designee for information and for access to data and records for the purpose of enabling the Affirmative Action Officer designee to carry out responsibilities under this complaint procedure.

Who May File

Any employees or applicants who believes that s/he has been discriminated against by reason of race, color, creed, religion, national origin, sex, marital status, status with regard to public assistance, membership or activity in a local human rights commission, disability, sexual orientation, or age may file a complaint. Employees who are terminated are encouraged to file their internal complaint prior to their actual separation; however, complaints will be taken for a reasonable period of time subsequent to the actual separation date.

The Complaint Procedure

The internal complaint procedure provides a method for resolving complaints involving violations of this college's nondiscrimination policy within the college. Employees and applicants are encouraged to use this internal complaint process. Retaliation against a person who has filed a complaint either internally or through an outside enforcement college or other legal channels is prohibited. The Affirmative Action Officer designee may contact the Office of Diversity and Equal Opportunity if s/he wants information about filing a complaint.

Filing Procedures

1. The employee or applicant completes the "Complaint of Discrimination Form" provided by the Affirmative Action Officer designee. Employees are encouraged to file a complaint within a reasonable period of time after the individual becomes aware that a situation may involve discriminatory harassment. The Affirmative Action Officer designee will, if requested, provide assistance in filling out the form.
2. The Affirmative Action Officer designee determines if the complaint falls under the purview of Equal Employment Opportunity law, i.e., the complainant is alleging discrimination or

harassment on the basis of race, color, creed, religion, national origin, sex, marital status, status with regard to public assistance, membership or activity in a local human rights commission, disability, sexual orientation, or age; or if the complaint is of a general personnel concern. The Affirmative Action Officer designee shall also discuss other options for resolution, such as the workplace mediation.

- A. If it is determined that the complaint is not related to discrimination but rather to general personnel concerns, the Affirmative Action Officer designee will inform the complainant, in writing, within ten (10) working days.
 - B. If the complaint is related to discrimination, the Affirmative Action Officer designee will, within ten (10) working days, contact all parties named as respondents and outline the basic facts of the complaint. The respondents will be asked to provide a response to the allegations within a specific period of time.
3. The Affirmative Action Officer designee shall then investigate the complaint. At the conclusion of the investigation, the Affirmative Action Officer designee shall notify the complainants and respondents that s/he has completed the investigation. The Affirmative Action Officer designee shall then review the findings of the investigation.
 - A. If there is sufficient evidence to substantiate the complaint, appropriate action will be taken.
 - B. If insufficient evidence exists to support the complaint, a letter will be sent to the complainants and the respondents dismissing the complaint.
 4. A written answer will be provided to the parties within sixty (60) days after the complaints are filed. The complainants will be notified should extenuating circumstances prevent completion of the investigation within sixty (60) days.
 5. Disposition of the complaint will be filed with the Commissioner of the Minnesota Management & Budget within 30 days after the final determination.
 6. All documentation associated with a complaint shall be considered investigative data under the Minnesota Government Data Practices Act. The status of the complaint will be shared with the complainants and respondents. After an investigation is completed and all appeals are exhausted, all documentation is subject to the provisions of the Minnesota Government Data Practices Act.
 7. All data collected may at some point become evidence in civil or criminal legal proceedings pursuant to state or federal statutes. An investigation may include, but is not limited to, the following types of data:

- A. Interviews or written interrogatories with all parties involved in the complaint, e.g., complainants, respondents, and their respective witnesses; officials having pertinent records or files, etc.
 - B. All records pertaining to the case i.e., written, recorded, filmed, or in any other form.
8. The Affirmative Action Officer designee shall maintain records of all complaints and any pertinent information or data for three (3) years after the case is closed.

VII. REASONABLE ACCOMMODATION POLICY

POLICY

The State of Minnesota is committed to the fair and equal employment of people with disabilities. Reasonable accommodation is the key to this non-discrimination policy. While many individuals with disabilities can work without accommodation, other qualified employees and applicants face barriers to employment without the accommodation process. It is the policy of this college to reasonably accommodate qualified individuals with disabilities unless the accommodation would impose an undue hardship. In accordance with the Minnesota Human Rights Act and the Americans with Disabilities Act, as amended, accommodations will be provided to qualified individuals with disabilities when such accommodations are directly related to performing the essential functions of a job, competing for a job, or to enjoy equal benefits and privileges of employment. This policy applies to all applicants, employees, and employees seeking promotional opportunities.

Definitions

Disability:

For purposes of determining eligibility for a reasonable accommodation, a person with a disability is one who has a physical or mental impairment that substantially limits one or more major life activities; or a record of such an impairment; or being regarded as having such an impairment.

Reasonable Accommodation:

A reasonable accommodation is a modification or adjustment to a job, an employment practice, or the work environment that makes it possible for a qualified individual with a disability to enjoy an equal employment opportunity.

Examples of accommodations may include acquiring or modifying equipment or devices; modifying training materials; making facilities readily accessible; modifying work schedules; and reassignment to a vacant position.

Reasonable accommodation applies to three aspects of employment:

- a. To assure equal opportunity in the employment process;
- b. To enable a qualified individual with a disability to perform the essential functions of a job; and
- c. To enable an employee with a disability to enjoy equal benefits and privileges of employment.

Procedure - Current Employees and Employees Seeking Accommodation

1. This college will inform all employees that this accommodation policy can be made available in accessible formats.
2. The employee shall inform their supervisor or the ADA Coordinator designee of the need for an accommodation.
3. The ADA Coordinator designee may request documentation of the individual's functional limitations to support the request. Any medical documentation must be collected and maintained on separate forms and in separate, locked files. No one will be told or have access to medical information unless the disability might require emergency treatment.
4. When a qualified individual with a disability has requested an accommodation, the employer shall, in consultation with the individual:
 - a. Discuss the purpose and essential functions of the particular job involved. Completion of a step-by-step job analysis may be necessary.
 - b. Determine the precise job-related limitation.
 - c. Identify the potential accommodations and assess the effectiveness each would have in allowing the individual to perform the essential functions of the job.
 - d. Select and implement the accommodation that is the most appropriate for both the individual and the employer. While an individual's preference will be given consideration, the college is free to choose among equally effective accommodations and may choose the one that is less expensive or easier to provide.
5. The ADA Coordinator or designee will work with the employee to obtain technical assistance, as needed.

6. The ADA Coordinator will provide a decision to the employee within a reasonable amount of time.
7. If an accommodation cannot overcome the existing barriers or if the accommodation would cause an undue hardship on the operation of the business, the employee and the ADA Coordinator designee shall work together to determine whether reassignment may be an appropriate accommodation.

Procedure-Job Applicants

1. The job applicant shall inform the ADA Coordinator designee of the need for an accommodation. The ADA Coordinator designee will discuss the needed accommodation and possible alternatives with the applicant.
2. The ADA Coordinator designee will make a decision regarding the request for accommodation and, if approved, take the necessary steps to see that the accommodation is provided.

Policy for Funding Accommodations

Funding must be approved by this college for accommodations that do not cause an undue hardship.

Definition of Undue Hardship

An undue hardship is an action that is unduly costly, extensive, substantial, or disruptive, or that would fundamentally alter the nature or operation of this college.

Procedure for Determining Undue Hardship

In determining whether or not providing a reasonable accommodation would impose an "undue hardship," the college will consider at least the following factors:

1. overall size of the program (i.e., number and type of facilities, size of budget);
2. type of the operation including the composition and structure of the work force;
3. nature and cost of the accommodation needed;
4. reasonable ability to finance the accommodation; and
5. documented good-faith efforts to explore less restrictive or less expensive alternatives including consultation with the disabled person or with knowledgeable disabled persons or organizations.

The ADA Coordinator designee will provide a decision to the employee.

Appeals

Employees or applicants who are dissatisfied with the decisions pertaining to his/her accommodation request may file an appeal with the college head, within a reasonable period of time, for a final decision.

If the individual believes the decision is based on discriminatory reasons, then they may file a complaint internally through the college's complaint procedure as outlined in this plan.

Supported Work

This college will review vacant positions and assess the current workload and needs of the office, to determine if job tasks might be performed by a supported employment worker(s). If appropriate, the college will work with the college ADA Coordinator and organizations that provide employment services to persons with disabilities to recruit and hire individuals for supported employment if such a position is created.

VIII. EVACUATION PROCEDURES FOR PERSONS WITH DISABILITIES

A copy of the college's weather and emergency evacuation plans can be found at:

<http://www.northlandcollege.edu/emergency/>

Knowledge and preparation by both persons needing assistance and those who don't is key to reducing the impact of emergencies. When developing a plan, safety needs should be determined on a case-by-case basis because it varies with each individual and building.

All persons have a responsibility to develop their own personal emergency evacuation plans; this includes persons with disabilities or persons who will need assistance during evacuation. The ADA Coordinator or designee in each college will work to develop a plan and consult the appropriate building and safety personnel. Work with your safety administrators to ensure an appropriate plan is in place and list the appropriate contacts in the affirmative action plan.

Supervisors should review the emergency evacuation procedures with staff, including informing all staff that if additional assistance may be needed, individuals should contact the college contact below to request the type of assistance they may need.

Becky Lindseth, Executive Director of Administrative Services
218-793-2476

Evacuation Options

Persons with disabilities have four basic, possibly five, evacuation options:

- **Horizontal evacuation:** using building exits to the outside ground level or going into unaffected wings of multi-building complexes.
- **Shelter in Place:** unless danger is imminent, remaining in a room with an exterior window, a telephone and a solid or fire resistant door. If individual requiring special evacuation assistance remains in place, they should dial 911 immediately and report their location to emergency services, who will in turn relay that information to on-site responders. The Shelter in Place approach may be more appropriate for sprinkler protected buildings where an area of refuge is not nearby or available. It may be more appropriate for an occupant who is alone when the alarm sounds.

Evacuation Procedures

Mobility disabilities (Individuals who use wheelchairs or other personal mobility devices (“PMDs”))

Persons using wheelchairs should be accompanied to an Area of Rescue Assistance by an employee or Shelter in Place when the alarm sounds. The safety and security staff will respond to each of the areas of rescue assistance every time a building evacuation is initiated to identify for the **college safety personnel** and Emergency responders how many individuals need assistance to safely evacuate.

Mobility disabilities (Individuals who do not use wheelchairs)

Persons with mobility disabilities, who are able to walk independently, may be able to negotiate stairs in an emergency with minor assistance. If danger is imminent, the individual should wait until the heavy traffic has cleared before attempting the stairs. If there is no immediate danger (detectable smoke, fire, or unusual odor), the person with disability may choose to wait at the Area of Rescue Assistance until Emergency responders arrive to assist them.

Hearing Disabilities

The college’s buildings are equipped with fire alarm horns/strobes that sound the alarm and flash strobe lights. The strobe lights are for persons with who are deaf and/or hard of hearing. Persons with hearing disabilities may not notice or hear emergency alarms and will need to be alerted of emergency situations.

Visual Disabilities

The college’s buildings are equipped with fire alarm horn/strobes that sound the alarm and flash strobe lights. The horn will alert individuals who are blind or have visual disabilities of the need to evacuate. Most individuals with visual disabilities will be familiar with their immediate surroundings and frequently traveled routes. Since the emergency evacuation route is likely different from the common traveled route, persons with visual disabilities may need assistance in evacuating. The assistant should

offer assistance, and if accepted, guide the individual with a visual disability through the evacuation route.

Severe Weather Evacuation Options

Persons with disabilities or who are in need of assistance during an evacuation have three evacuation options based on their location in their building:

- **Horizontal evacuation:** If located on the ground or basement floor, severe weather shelter areas are located throughout each floor.
- **Elevator evacuation:** If there are no safe areas above the ground floor, the elevator may be used to evacuate to the ground or basement levels.
- **Shelter in Place:** Seeking shelter in a designated severe weather shelter and remaining there until the all clear is used.

IX. GOALS AND TIMETABLES

Through the utilization analysis, the college has determined which job groups are underutilized for women, minorities and persons with disabilities within the college and has set the following hiring goals for the next two years.

Job Group	Underutilization - # of Persons				Hiring Goals for 2014-16			
	Women	Minorities	Persons with Disability	Veterans	Women	Minorities	Persons with Disability	Veterans
Officials and Administrators			1				1	
Professionals	23	5	15		1	1	1	
Technicians	1							
Office/Clerical		1	1	2			1	1
Skilled Craft								
Service Maintenance	5	1		2	1			1

Table 1

Underutilization Analysis

Availability

The college used determined the recruitment area to be the statewide for all job categories. In conducting its underutilization analysis, the college used the one-factor analysis. The college determined it was best to use this type of analysis due to the low number of internal movement in the past as well as projected in the future and taking into consideration increased attrition within the College due to budget reasons.

Underutilization Analysis worksheets are attached in the appendix. Numbers less than 10 are indicated with "<10" in accordance with MMB's guidance on data privacy.

Women

At the college, the population of women has improved in the following job categories: Officials/Administrators, Professional, Office/Clerical and Service Maintenance and remained the same in the following job categories: Technicians and Skilled Craft. The college has gradually been increasing the recruitment and retention efforts to address the past disparities with underutilized groups. We do anticipate retirements in the coming plan year and remain hopeful given the budget constraints we are facing, that we will fill with some of the underutilized groups.

Minorities

At the college, the population of minorities has improved in the following job category: Professionals and remained the same in the remaining categories. The college advertises in publications and online sites that specifically target the minority populations. Our intent is to continue to work closely with DEED and Workforce Centers in hopes of attracting additional minorities for future positions as well as using our diversity committee in providing services to retain minority hires. Due to our geographic location and budget constraints, our goals are somewhat ambitious.

People with Disabilities

At the college, the population of persons with disabilities has improved in the following job categories Office/Clerical and Service Maintenance and not improved in the following job categories: Professionals but remained the same in the following: Officials/Administrators, Technicians and Skilled Craft. Our intent is to continue to work closely with DEED and Workforce Center in hopes of attracting and accommodating disabled individuals for future positions as well as increase our services to retain new hires. Again, as mentioned above, with budget constraints in the future, our goals are ambitious.

X. AFFIRMATIVE ACTION PROGRAM OBJECTIVES

In pursuing the college's commitment to affirmative action, the college will take the following actions during 2014-2016.

Objective #1: Maximize employment opportunities for protected class members.

Action Steps:

- Continue working closely with DEED and Workforce Center in reaching potential protected class applicants.
- Find additional advertising avenues that circulate underrepresented classes.
- Provide additional information to search committee members on process and efforts of networking to enhance the recruitment of qualified protected applicants.
- Adhere to the search committee procedures providing expense reimbursement for candidates who interview.

Evaluation: The college has followed our goals and objectives to the extent our budget / hiring needs allow. We have improved or remained the same on many of the categories and will continue on an on-going basis in hopes of exceeding our goals for the FY14-16 plan year.

Objective #2: Provide opportunities for employees to heighten their awareness and appreciation of diversity differences and non-discrimination in communication, relationship and learning.

Action Steps:

- Increase the on-campus professional development series to heighten awareness and appreciation of cultural diversity utilizing current employees to eliminate high costs.
- Educate employees on services available for students and employees with disabilities.
- Provide opportunities to supervisors and staff to broaden their understanding of diverse populations and encourage personal growth within the college community.
- Faculty In-service sessions along with information provided during new employee orientation.
- Students and employees receive information on the College Nondiscrimination policy.

Evaluation: This is an on-going objective which serves as a reminder to all employees. Again, the college has been functioning very lean due to budget restraints and limited resources, however, we are very optimistic we can promote and provide the action steps necessary to achieve our objective.

Objective #3: Enhance recruitment and retention efforts with prospective minority students and students with disabilities for admission to occupational and liberal arts programs at the college.

Action Steps:

- Incorporating program-specific advising – assignment advisors to specific programs to build relationships with students.
- Inquiry to applicant calling
- Mass mailings per demographics search to prospective students, recent grads, age specific, etc.
- Mass mailing to inquiry to applicant list

Evaluation: Progress has been slow, in all attempts, enrollment is low. The college, like many others, did experience growth when unemployment was high; however, with the very low unemployment rates currently, we are experiencing low enrollment as well. Retention efforts however, have proved to be successful.

Objective #4: .

Action Steps:

- Incorporating program-specific advising – assignment advisors to specific programs to build relationships with students.
- Inquiry to applicant calling
- Mass mailings per demographics search to prospective students, recent grads, age specific, etc.
- Mass mailing to inquiry to applicant list

Evaluation: Progress has been slow, in all attempts, enrollment is low. The college, like many others, did experience growth when unemployment was high; however, with the very low unemployment rates currently, we are experiencing low enrollment as well. Retention efforts however, have proved to be successful.

XI. METHODS OF AUDITING, EVALUATING AND REPORTING PROGRAM SUCCESS

A. Pre-Employment Review Procedure/Monitoring the Hiring Process

The college will evaluate its selection process to determine if our requirements unnecessarily screen out a disproportionate number of women, minorities, or people with disabilities. The college will use the monitoring the hiring process form for every hire to track the number of women, minorities, and individuals with disabilities in each stage of the selection process. Hiring managers and supervisors will work closely with human resources and the affirmative action officer in reviewing the requirements for the

position, posting the position, and interviewing and selection to ensure that equal opportunity and affirmative action is carried out. Hiring managers will be asked to document their hiring decisions and equal opportunity professionals will review for bias.

Any time the college cannot justify a hire, the college takes a missed opportunity. College leadership will be asked to authorize the missed opportunity. The college will report the number of affirmative and nonaffirmative hires as well as missed opportunities to Minnesota Management & Budget on a quarterly basis.

When candidates are offered interviews, personnel scheduling interviews will describe the interview format to the candidate and provide an invitation to request a reasonable accommodation notice to candidates with disabilities to allow the candidate equal opportunity to participate in the interview process. For example, if interview questions are offered ahead of time or what technology may be used during the interview process.

It shall be the goal of the college to promote diversity in all of its manifestations. The college encourages candidates to apply for vacancies of varying ages, from many cultural backgrounds and from various parts of the world.

The Supervisor determines that a vacancy exists and gains administrative approval to initiate the search process. The affirmative action officer will determine if under-utilization exists in the goal unit for each specific vacancy.

If under-utilization exists for a goal unit for a vacancy, the college will reimburse administrator candidates for pre-approved actual costs associated to travel for the interview and the college will reimburse other candidates for other vacancies up to a maximum of \$250 for those individuals that are traveling in excess of 150 (one-way) miles to participate in the interview. For vacancies where under-utilization exists, candidates will be reduced to no more than five (5) to be invited for on-site interviews.

When under-utilization exists, the college will advertise vacancies in publications to target protected class applications. The college will make a good faith effort to include protected class candidates throughout the application and selection process.

At any stage of the process, the affirmative action officer may request that the president extend and/or close the search if the pool of protected class candidates is not satisfactory.

The college is committed to considering persons with disabilities who can perform the essential functions of the job with or without reasonable accommodations, and recruitment efforts will target people with disabilities.

The search committee will be chaired by the appropriate administrator/supervisor or the Executive Director of Administrative Services/Human Resources Director and is responsible for the aspects of the search process. Volunteer representatives from

constituent groups will be sought to participate in the search process, as appropriate: support staff, faculty, students, advisory committee, and business/industry. Support staff may be appointed from various bargaining units. Composition of the search committee will be contingent upon the nature of the vacancy. The Executive Director of Administrative Services/HR Director may serve as a non-voting member of the committee as the Affirmative Action Officer.

All members of the search committee must agree to make themselves available to all aspects of the hiring process or they should not serve. All members will also attend an orientation and criteria development meeting before the initial screening of the applicant files begins and must agree to maintain confidentiality during the entire process. Members of the search committee should not provide letters of recommendation for candidates as this poses a potential conflict of interest.

The role of the search committee is to be a partner with the administration in filling the vacancy. Tasks may include review of the position description (if applicable), screening of candidates, creation of the interview questions, and the evaluation of candidates.

The search committee will review all applications and identify the candidates to be interviewed. The pool of candidates to be interviewed will, when appropriate, be expanded to include faculty with system-wide interview rights. The Affirmative Action Officer and the President may add candidates to the interview pool.

The Human Resources Department will contact all semi-finalists to arrange the interviews and if they remain interested, will send them:

- a. Confirmation of date and time of appointment
- b. Position description and/or proposed assignment
- c. Promotional materials about the college and community

Other activities intended to assist the candidates understand the college and the community may be developed. They may include:

- a. A tour of the college
- b. Relocation information regarding housing, community orientation, etc.
- c. A meeting with the college president

When the interviews have been completed, the search committee will meet to discuss and determine which of the semi-finalists meet the criteria and are acceptable for recommendation to the president. The determination is to be based on the following factors:

- a. The candidates' credentials
- b. Interview results
- c. A presentation/lecture on a topic germane to responsibilities of the position (or some other method used to evaluate the candidates approach to teaching or qualifications, if applicable).

Final candidates list is compiled and submitted to the President. The President may meet with the committee for discussion prior to making a selection and may conduct reference checks. The President will make the appointment.

Classified Vacancies – the recruitment strategies for classified positions will vary from that of unclassified positions. The recruitment strategies utilized will be in compliance with the policies and procedures established by the Minnesota Management and Budget regarding the civil service process. Several factors may influence the recruitment and appointments such as bid, recall from layoff, claim, transfer from another state agency, etc.

The Employee Selection Procedures will not be implemented for emergency or temporary appointments. All personnel involved in the selection process will be trained and accountable for the college's commitment to equal opportunity and the affirmative action program and its implementation.

B. Pre-Review Procedure for Layoff Decisions

The Affirmative Action Officer, in conjunction with the college human resources office and the President, shall be responsible for reviewing all pending layoffs to determine their effect on college affirmative action goals and timetables.

If it is determined that there is an adverse impact on affirmative action groups, the college will document the reasons why the lay off is occurring, such as positions targeted for layoff, applicable personnel policies or collective bargaining agreement provisions, or other relevant reasons. The college will determine if other alternatives are available to minimize the impact on protected groups.

C. Other Methods of Program Evaluation

Our college submits the following compliance reports to Minnesota Management & Budget as part of our efforts to evaluate our affirmative action program.

- Quarterly Monitoring the Hiring Process Reports
- Biannual Affirmative Action Plan
- Annual ADA Report

Our college also evaluates our affirmative action plan in the following:

- Monitors progress toward stated goals by job category on a quarterly basis;
- Analyzes employment activity – hires, promotions, and terminations by job group to determine if there is adverse impact;

- Analyzes compensation program to determine if there are patterns of discrimination per respective hires;
- Reviews the accessibility of online systems, websites, and ensures that reasonable accommodations can be easily requested;
- Discussion of progress with college leadership on a periodic basis and recommendations for improvement.

XII. RECRUITMENT PLAN

The objective of this recruitment plan is to ensure our college recruitment programs are publicly marketed, attract and obtain qualified applicants, enhance the image of state employment and to assist in meeting our college affirmative action goals to achieve a diverse work force.

Recruitment costs incurred during the 2012-2014 plan year includes: \$30,000

Listed below are various recruitment methods or strategies utilized by this college during the past year.

Regional Newspapers

- Bemidji Pioneer
- Bismarck Tribune
- Crookston Daily Times
- Duluth Times
- Fargo Forum
- Grand Forks Herald
- Indian Country
- Job Dig
- Roseau Times Region
- Star Tribune
- Thief River Falls Watch
- Thief River Falls Times

Higher Education Publications

- American Association of Community Colleges
- American Veterans Employment Journal
- Chronicle of Higher Education
- Women in Higher Education

Websites

- Career Builder
- Chronicle of Higher Education

- Equal Opportunity Employment Journal
- Fargo has Jobs / AIM Institute
- Job Dig
- JobsHQ
- Indeed
- Midwest Higher Education Recruitment Consortium (HERC)
- Minnesota Minnesota Management and Budget
- Minnesota Workforce Center
- MnSCU Opportunity Bulletin

A. Job and Community Fairs

Due to staffing, budget and geographic location, Northland has not participated in job fairs in the past two years.

B. College and University Recruitment Events

Due to time and budget constraints, the College has not participated recruitment events within the past two years.

C. Recruitment for Persons with Disabilities

Northland aggressively seeks out qualified women, persons of color and persons with disabilities in an effort to develop a workforce that properly resembles the diversity in our student body, and the communities which we serve. At all stages in the hiring process, all persons shall be treated with dignity and respect and provided with equal opportunity. In particular, appropriate accommodations will be offered throughout the hiring process to persons with disabilities.

D. Relationship Building and Outreach

College employees participate in many community events and serve on various committees which in turn builds stronger community relations and ties with the college.

E. Internships

Northland has not had an active internship program.

F. Supported Employment (M.S. 43A.191, Subd. 2(d))

This college supports the employment of individuals with disabilities and will review vacant positions to determine if job tasks can be performed by a supported employment workers. We will work with community organizations that provide employment services to people with disabilities to recruit for these positions.

G. Additional Recruitment Activities

The college (MnSCU) is a member of the Upper Midwest Higher Education Consortium.

XIII. RETENTION PLAN

Our college is committed to not just the recruitment of women, minorities, and persons with disabilities, but also to the retention of these affirmative action groups.

A. Person Responsible for College’s Retention Program/Activities

The Human Resources Director, Becky Lindseth, 2022 Central Ave. NE, East Grand Forks, MN 56721, 218-793-2476 and Kristi Lane, Affirmative Action Officer, 1101 Hwy 1 East, Thief River Falls, MN 56701, 218-683-8631 are responsible for overseeing the retention programs and activities for the college.

B. Separation and Retention Analysis by Protected Groups

Types of Separation	Total Number	Percentage	Women	Persons with Disability	Minorities
Termination/Non-Certification	2	4%	1	0	0
Resignation	24	48%	12	1	4
Enhanced Separation	6	12%	3	0	0
Retirement	15	30%	8	1	0
Layoff	2	40%	1	0	0
Term w/o Rights	1	20%	0	0	0
Total Separations	50	154%	25 (50%)	2 (4%)	4 (8%)

The college anticipates opportunities to hire employees and convert faculty during the fiscal years 2015 and 2016 in the following areas:

- Officials and Managers 2 Vacancies
- Professionals 3 Vacancies
- Office/Clerical 1 Vacancy
- Service Maintenance 1 Vacancy

Goal 1: The goal is to fill two Officials/Managers Vacancies with members from a protected group.

Goal 2: The goal is to hire three Professionals with members from a protected group.

Goal 3: The goal is to fill one Office/Clerical vacancy with a protected group.

Goal 4: The goal is to fill one Service Maintenance vacancy with a protected group.

Northland’s goals of hiring from protected classes are ambitious given the geographic location and low unemployment rate within the geographic area. However, as displayed in the

separation analysis above, unfortunately, Northland did lose a high percentage of our protected classes in the last two years. Our intent is to provide additional opportunities and efforts in our retention processes in an effort to attract and retain protected class employees as well as provide additional training to existing employees regarding the inclusive environment.

C. Methods of Retention of Protected Groups

- Employee recognition events to include Years of Service recognition, retirement reconitions, new employee orientation and staff inservices.
- Employees have access per the bargaining unit agreements, to participate in tuition waiver benefit for the employee and spouse/dependents.
- Increase the communication of diversity efforts and programs at the college during new employee orientation sessions as well as upon hire.
- Increase learning opportunities for employees that foster an inclusive environment by providing professional development sessions and diversity training.

APPENDIX

A. Complaint Of Harassment/Discrimination

Northland Community and Technical College
1101 Hwy 1 East
Thief River Falls, MN 56701
218-683-8631

Please Read Before Completion of Form

Any complaint of harassment/discrimination is considered confidential data under Minnesota Statute 13.39, Subd. 1 and 2. This information is being collected for the purpose of determining whether harassment/discrimination has occurred. You are not legally required to provide this information, but without it, an investigation cannot be conducted. This information may only be released to the Affirmative Action Officer designee, the complainant, the respondent, and appropriate personnel.

Complainant (You)		
Name	Job Title	
Work Address	City, State, Zip Code	Telephone ()
College	Division	Manager
Respondent (Person Who Harassed/Discriminated Against You)		
Name	Job Title	
Work Address	City, State, Zip Code	Telephone ()
College	Division	Manager

The Complaint
Basis of Complaint ("X" all that apply): <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> Disability <input type="checkbox"/> Sexual Orientation <input type="checkbox"/> Sex <input type="checkbox"/> Creed <input type="checkbox"/> Marital Status <input type="checkbox"/> Status with Regard to Public Assistance

<input type="checkbox"/> Age <input type="checkbox"/> Religion <input type="checkbox"/> National Origin <input type="checkbox"/> Membership or Activity in a Local Human Rights Commission	
Date most recent act of harassment/discrimination took place:	If you filed this complaint with another college, give the name of that college:
Describe how you believe that you have been harassed/discriminated against (names, dates, places, etc.). Use a separate sheet of paper if needed and attach to this form.	

Information on Witnesses Who Can Support Your Case		
Name	Work Address	Work Telephone
1.		()
2.		()
3.		()

Additional witnesses may be listed in "Additional Information" or on a separate sheet attached to this form.

This complaint is being filed on my honest belief that the State of Minnesota has harassed/discriminated against me. I hereby certify that the information I have provided in this complaint is true, correct and complete to the best of my knowledge and belief.	
Complainant Signature	Date

Affirmative Action Officer Signature	Date
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B. Employee Request for Reasonable Accommodation Form



**State of Minnesota
Northland Community and Technical College
Employee/Applicant Request for ADA Reasonable
Accommodation Form**

The State of Minnesota is committed to complying with the Americans with Disabilities Act (“ADA”) and the Minnesota Human Rights Act (“MHRA”). To be eligible for an ADA accommodation, you must be 1) qualified to perform the essential functions of your position and 2) have a disability that limits a major life activity or function. The ADA Coordinator/Designee will review each request on an individualized case-by-case basis to determine whether or not an accommodation can be made.

Employee Name: _____ Job Title: _____

Work Location: _____

Data Privacy Statement: This information may be used by your college Human Resources representative, ADA coordinator/designee, your college legal counsel or any other person who is authorized by your college to receive medical information for purposes of providing reasonable accommodations under the ADA and MHRA. This information is necessary to determine whether you have a disability as defined by the ADA or MHRA, and to determine whether any reasonable accommodation can be made. The provision of this information is strictly voluntary; however, if you refuse to provide it, your college may refuse to provide reasonable accommodation.

Questions to clarify accommodation requested.

1. What specific accommodation are you requesting?

2. If you are not sure what accommodation is needed, do you have any suggestions about what options we can explore.
 - a. If yes, please explain.

**State of Minnesota – Northland Community and Technical College
Reasonable Accommodation Request Form, Page 2**

Questions to document the reason for the accommodation request. *(Please attach additional pages as necessary).*

1. What, if any job function are you having difficulty performing?
2. What, if any employment benefit are you having difficulty accessing?
3. What limitation as result of your physical or mental impairment is interfering with your ability to perform your job or access an employment benefit?
4. If you are requesting a specific accommodation, how will that accommodation be effective in allowing you to perform the functions of your job?

Information Pertaining to Medical Documentation

In the context of assessing an accommodation request, medical documentation may be needed to determine if the employee has a disability covered by the ADA and to assist in identifying an effective accommodation.

The ADA Coordinator/Designee in each college is tasked with collecting necessary medical documentation. In the event that medical documentation is needed, the employee will be provided with the appropriate forms to submit to their medical provider. The employee has the responsibility to ensure that the medical provider follows through on requests for medical information.

State of Minnesota – Northland Community and Technical College

Reasonable Accommodation Request Form, Page 3

Genetic Information Nondiscrimination Act of 2008 Disclosure: This authorization does not cover, and the information to be disclosed should not contain, genetic information. “Genetic Information” includes: Information about an individual’s genetic tests; information about genetic tests of an individual’s family members; information about the manifestation of a disease or disorder in an individual’s family members (family medical history); an individual’s request for, or receipt of, genetic services, or the participation in clinical research that includes genetic services by the individual or a family member of the individual; and genetic information of a fetus carried by an individual or by a pregnant woman who is a family member of the individual and the genetic information of any embryo legally held by the individual or family member using an assisted reproductive technology.

Employee Signature: _____ Date: _____

- C. Nondiscrimination Policy/Procedure
- D. Sexual Violence Policy/Procedure
- E. Emergency Response, Notification & Evacuation Procedure
- F. Reasonable Accommodation Policy/Procedure
- G. Underutilization Analysis & Goals
- H. Separation Analysis