



**TENNESSEE COLLEGE  
OF APPLIED TECHNOLOGY**  
— **JACKSBORO** —

**EQUAL EMPLOYMENT  
OPPORTUNITY**

**AFFIRMATIVE ACTION PLAN**

**July 2015**

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## INTRODUCTION

The Tennessee Board of Regents ("TBR") and the Tennessee College of Applied Technology – Jacksboro (TCAT – Jacksboro) are committed to building, promoting and sustaining diversity and equality in education and employment. We embrace diversity in all its forms and strive for an inclusive workplace based on this commitment.

Affirmative Action is a term that encompasses any measure adopted by an employer to prevent discrimination from occurring in the future. Affirmative Action goes beyond the simple termination of a discriminatory practice. The Affirmative Action Plan ("AAP") is a detailed, results-oriented set of procedures which, when carried out, assist in compliance with equal employment opportunity requirements through full representation and equal treatment of all people.

The TBR is further committed to enforcement of policies that foster diversity and inclusivity. These policies include, but are not limited to: Equal Employment Opportunity and Affirmative Action: 5:01:02:00; Policy Guideline P-080: Discrimination and Harassment – Complaint and Investigation Procedure; Policy Guideline P-010 Personnel Transactions and Recommended Forms; and System Office Non-Discrimination Policy: SO-OESI-Non-Discrimination. TCAT – Jacksboro fully complies and follows all TBR policies.

Our primary service area includes Anderson, Campbell, Claiborne, and Scott counties. TCAT Jacksboro's service area aligns with the Local Workforce Investment Areas (LWIA) 2, and 4. Many of TCAT Jacksboro's graduates pursue employment in LWIA 3 (Knoxville). The largest major occupation group for Tennessee remains in office and administrative support occupations followed sales and related occupations, and transportation and material moving occupations. Anderson County's unemployment rate for March 2015 was 6.0%, with Campbell at 8.1%, Claiborne at 7.6%, and Scott at 10.4%. The unemployment rates in our service area counties have dropped in the past year. Our service area's rates are higher than state and national averages. The National rate for March 2015 was 5.6% while Tennessee's rate was 5.9%.

Employees are our most valuable resource. Our policy is to ensure equal employment opportunities for all current and future employees, regardless of race, color, sex, national origin, age, physical ability, or political affiliation. This policy applies to all personnel actions, including, but not limited to recruiting, hiring, classification, compensation, benefits, promotion, transfers, layoffs, recalls from layoffs and education, social and recreational programs of this agency.

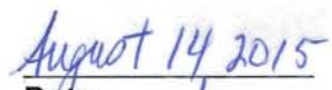
As Interim Director, I affirm my personal commitment to these objectives, and the TBR's policy on equal employment opportunity and affirmative action. Ms. Rita Broyles, Student Services Coordinator has been appointed as the Affirmative Action Plan Coordinator for TCAT Jacksboro. Ms. Broyles has overall responsibility for implementing TCAT Jacksboro's Affirmative Action Plan (Plan), including the


development of specific goals and timetables, and will be responsible for reporting progress towards reaching and attaining the goals and action items outlined in the Plan.

TCAT Jacksboro's Plan is evaluated each year and we will adjust our goals accordingly. We expect the full cooperation of all the faculty and staff of this college in realizing these goals.

A copy of the affirmative action program, including specific responsibilities and provisions for implementation and compliance, will be made available to all employees.

  
Debbie J. Petree  
Interim Director

  
Date

  
Rita Broyles  
Affirmative Action Officer

  
Date



**Tennessee College of Applied Technology – Jacksboro**  
**EQUAL EMPLOYMENT OPPORTUNITY STATEMENT OF POLICY**

The Tennessee College of Applied Technology - Jacksboro is an Affirmative Action and equal employment opportunity employer and does not to engage in discrimination against or harassment of any person employed by, or seeking employment with the TCAT - Jacksboro on the basis of race, color, national origin, religion, sex, gender expression, gender identity, disability, age, sexual orientation, political affiliation, genetic information, status as a protected veteran, or any other legally protected class. This policy applies to all employment practices, including recruitment, selection, promotion, transfer, merit increase, salary, training and development, demotion, discipline, and separation. This policy is intended to be consistent with the provisions of applicable state and federal laws and Board policies.

TBR/TCAT – Jacksboro policy also prohibits retaliation against any employee or person seeking employment for bringing a complaint of discrimination or harassment pursuant to this policy. Further, this policy prohibits retaliation against a person who assists someone with a complaint of discrimination or harassment, or participates in any manner in an investigation or resolution of a complaint of discrimination or harassment. Retaliation includes threats, intimidation, reprisals, and/or adverse actions related to employment.

In addition, it is the policy of the TBR/TCAT - Jacksboro to undertake affirmative action for minorities and women, for persons with disabilities, and for protected veterans. The TBR and TCAT – Jacksboro commits to apply every good faith effort to achieve prompt and full utilization of minorities, women, individuals with disabilities, and protected veterans in all segments of its workforce where deficiencies exist. These efforts conform to all current legal and regulatory requirements, and are consistent with Board standards of diversity and inclusion.

## **POLICY DISSEMINATION**

TCAT - Jacksboro makes every effort to widely disseminate the Non-discrimination & Harassment Policy.

### **Internal Policy Dissemination**

- TCAT - Jacksboro reviews and updates this affirmative action plan annually and informs employees of significant changes.
- TCAT - Jacksboro has incorporated its EEO/AA policies into personnel policies.
- TCAT - Jacksboro includes discussion of EEO/AA policies in all applicable department and division trainings.
- TCAT - Jacksboro holds meetings with employees to inform them of TBR/TCAT - Jacksboro's EEO/AA policies.

- TBR/TCAT - Jacksboro posts equal employment opportunity policy on bulletin boards in designated break areas. In addition, posters on employee rights under ADA and ADA contacts are posted in designated workplaces.

The Affirmative Action Plan is available in the Administrative Office, 265 Elkins Road, Jacksboro, TN, for inspection by any employee or applicant for employment, upon request, during normal business hours 8:00 am – 4:30 pm.

### **External Policy Dissemination**

The TCAT - Jacksboro includes its EEO/AA policy statement in all advertising for job announcements.

The OESI departmental website: [www.tbr.edu/oesi](http://www.tbr.edu/oesi), includes an explanation of the application of all applicable disability laws and policies, as well as resources available to assist with accessibility. TCAT – Jacksboro follows all applicable disability laws and policies set forth by TBR.

## **PART I: AFFIRMATIVE ACTION PROGRAM FOR MINORITIES AND FEMALES**

### **Establishment of Responsibilities for Implementation of the Written Affirmative Action Program (41 CFR 60-2.17(a))**

As part of TCAT – Jacksboro's efforts to ensure equal employment opportunity to all individuals, the college has designated specific responsibilities to various staff to ensure the AAP focuses on all components of the employment process. To that end, the Director, the Affirmative Action Officer, and those employed as managers, and supervisors are responsible for the following:

### **Designation of Responsibilities of Affirmative Action Officer (41 CFR 60-2.17(a))**

As reflected in the equal opportunity statement, TCAT - Jacksboro is committed to realistic implementation of its Affirmative Action Plan ("AAP") and programs.

Rita Broyles, the Affirmative Action Officer, has the primary management responsibility, authority, and resources for ensuring full compliance with the provisions of E. O. 11246, as amended, and with implementing all applicable regulations. The Affirmative Action Officer's appointment and a description of the position's basic responsibilities have been communicated to all levels of personnel in the agency. The responsibilities of the Affirmative Action Officer include, but are not necessarily limited to, the following:

1. Developing EEO policy statements, Affirmative Action Programs, and internal and external communication procedures;
2. Assisting in the identification of AAP/EEO problems;
3. Assisting management in arriving at effective solutions to AAP/EEO



- problems;
4. Designing and implementing an internal audit and reporting system that:
    - a. Measures the effectiveness of the Affirmative Action program;
    - b. Determines the degree to which AAP goals and objectives are met; and
    - c. Identifies the need for remedial action
  5. Keeping the TCAT Director informed of equal opportunity progress and reporting potential problem areas within the institution through reports;
  6. Reviewing the college's AAP for qualified minorities and women with all levels of management to ensure that the policy is understood and is followed in all personnel activities;
  7. Auditing the contents of the college's bulletin board to ensure compliance information is posted and up-to-date;
  8. Adhering to the policy and intent of the AAP by promoting progress toward the goals and objectives of the AAP, ensuring that appropriate steps are taken throughout all departments, and holding supervisory staff and employees accountable for promoting equal employment opportunities in the workplace; and
  9. Serving as liaison between TCAT – Jacksboro, TBR and enforcement agencies.

#### **The Responsibilities of the Director and Affirmative Action Officer to Ensure Implementation of the AAP (41 CFR 60-2.17(a))**

In implementing this written AAP, the responsibilities of the TCAT – Jacksboro Director working with the Affirmative Action Officer include, but are not necessarily limited to, the following:

1. Assisting in the identification of problem areas, formulating solutions, and establishing college goals and objectives when appropriate;
2. Reviewing the qualifications of all applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner when hiring, promotion, transfer, and termination actions occur;
3. Regular discussions with supervisors, and employees to be certain the AAP and equal opportunity policies are adhered to; and
4. Review the job performance of each employee to assess whether personnel actions are justified based on the employee's performance of his or her duties and responsibilities.

#### **The Responsibilities of Supervisors (41 CFR 60-2.17(a))**

In their direct day-to-day contact with TBR and TCAT – Jacksboro supervisors have assumed certain responsibilities in implementing this written AAP. These include, but are not limited to, the following:

1. Aggressively adhere to TBR's equal employment opportunity and affirmative



- action policy – P-010 – Personnel Transactions and Recommended Forms.
2. Ensure that all interviews, offers of employment and/or wage commitments are consistent with TBR/TCAT - Jacksboro's policy.
  3. Ensure implementation of the internal promotion and transfer of all staff under their supervision is consistent with AAP goals and objectives.
  4. Assist in identifying problem areas and provide needed information for establishing and meeting affirmative action goals and objectives.

## **Organizational Profile**

### **Workforce Analysis**

The workforce analysis lists each job by payroll title, salary, and indicates for each job title, the total number of incumbents, the total number of male and female incumbents, and the total number of male and female incumbents within the following ethnic groups: White, Black, Asian, Native American, Hispanic, Pacific Islander, and two or more races. The list includes all job titles, including departmental supervision, exempt and nonexempt positions. Job titles are listed by organizational unit and are listed from the lowest to the highest paid.

TCAT - Jacksboro carefully reviewed the workforce analysis to identify problem areas needing correction, such as concentrations or segregation of minorities or women by organizational unit, job, salary, or EEO category. Problems, if any, were identified in the 'Identification of Problem Areas' section of this report; programs to correct and/or improve any identified problems are addressed in the 'Development and Execution of Action-Oriented Programs' section.

An analysis of the four (4) service area counties resulted in very low, or no populations of African Americans, Indigenous Americans (American Indians), Hispanics, or other ethnic groups considered underrepresented or protected. The data indicated very low percentages of recruitable populations having the necessary skills to qualify for employment at the TCAT Jacksboro.

Data was derived from the **Affirmative Action Data – 2000 Census**, available online at <http://www.tn.gov/labor-wfd/affirmact/affirmative2000.pdf> and the 2015 **Affirmative Action Data Supplement** available online at <http://www.tn.gov/labor-wfd/affirmact/pdf/affirmative2015.pdf>. Data sets were constructed for Anderson County, Campbell County, Claiborne County, and Scott County.

### **Job Group Analysis**

As required by 41 CFR § 60-2.12, jobs with similar content, wage rates, and opportunities are combined to form job groups. Similarity of content refers to the duties and responsibilities of the job titles which make up the job group. Similarity of opportunity refers to training, transfers, promotions, pay, mobility, and other career enhancement opportunities. The job group is the basic unit for all successive affirmative



action plan analyses and is the first step in comparison of the representation of minorities and women in the workforce with their estimated availability.

Many job titles are so similar in content that handling them individually in the AAP is not necessary. Grouping together these very similar titles is appropriate for the comparison of incumbency to availability. For many job titles, the availability data that can be collected is limited, and the same data must be used for several related jobs. Therefore, grouping these related titles together is logical. Also, many job titles have so few incumbents in them that identifying disparities between incumbency and availability by job title would be meaningless – as problem areas would be identified in terms of fractions of people. By grouping several similar titles and increasing the number of employees involved, a meaningful comparison can be conducted and any identified problem areas are more likely to be in terms of whole people. Consequently, goals established to correct problem areas are also more likely to be in terms of whole people.

### **Availability Assessment**

"Availability" is an estimate of the proportion of each sex and race/ethnic group available and qualified for employment at TBR for a given job group in the relevant labor market during the AAP reporting cycle. Availability indicates the approximate level at which each race/ethnic and sex group could reasonably be expected to be represented in a job group if TCAT - Jacksboro's employment decisions are being made without regard to sex, race, or ethnic origin. Availability estimates, therefore, are a way of translating equal employment opportunity into concrete numerical terms. Correct comparisons of incumbency to availability, worthwhile and attainable goals, and real increases in employment for problem groups depend on competent and accurate availability analyses. With valid availability data, we can compare the percentages of those who could reasonably be expected to be employed versus our current employment (from the workforce analysis), identify problem areas, and establish goals to correct the problems.

TCAT - Jacksboro determines the availability of minorities and women for each job group by considering the following factors: 1) external availability, i.e., the percentage of minorities or women with requisite skills in the reasonable recruitment area, which is generally identified as local (Anderson, Campbell, Claiborne, and Scott counties), state, or national and 2) internal availability, i.e., the percentage of minorities or women among those promotable, transferable, and trainable within the organization. Primary weight is given to 2000 U.S. Census and the 2015 Supplement data indicating how many women and members of ethnic minority groups with the requisite job skills live in the defined recruiting area for that job group.

For job groups with high levels of responsibility and expertise, which include the Executive, Managerial, and Administrative, the reasonable recruitment area is weighted heavily for the state. The rationale is that many applicants for these job titles came from throughout the state because the pool criteria are very specialized. For these highly specialized positions, a search beyond the locally defined area is necessary to yield a



qualified and diverse candidate pool that includes women and minorities. The Clerical job group has more localized recruiting specific to the local service area.

### **Comparing Incumbency to Availability**

Once final availability estimates were made for each job group, TCAT - Jacksboro compared the percentage of incumbents in each job group to their corresponding availability. A comparison was made between the percentages of employed full and part-time employees as of the last date of the AAP reporting year and the estimated availability. If the percentage of minorities or women in a particular job group is less than would reasonably be expected given the availability estimate, the job group is considered underutilized.

TCAT - Jacksboro uses the 'Any Difference Rule' to identify any job group that has less than expected minorities and women. With this test, a goal is set when availability exceeds employment by any difference. Using this method represents a clear statement of TCAT - Jacksboro good faith efforts to address any potential issues with underutilization.

### **Identification of Problem Areas (41 CFR 60-2.17(b))**

TCAT - Jacksboro performs in-depth analysis of its total employment process to determine if there are areas where minority and/or female groups may face impediments to equal opportunity. The following analyses are conducted in order to reveal any potential problem areas:

1. **Placement Goals:** An analysis of incumbency versus availability is performed to determine whether there are problems of minority or female utilization. Whenever a problem exists, as defined by a statistical methodology, Placement Goals are set (see the Placement Goals report which follows this section).

Goals are not rigid and inflexible quotas which must be met, but are instead targets reasonably attainable by means of applying every good faith effort to make all aspects of the entire AAP work. A goal is a guide in which TBR, TCAT - Jacksboro, a community group, or a compliance agency can measure progress in remedying identified under representation in TCAT - Jacksboro's workforce. TCAT - Jacksboro has identified areas needing improvement and presents the results to the TBR on their progress annually, emphasizing the importance of a diverse workforce.

Whether there are Placement Goals or not, steps will be taken to encourage and increase the percentage of qualified females and/or minorities applying for positions both externally and internally. These steps may include, but are not limited to the following:

- Working with hiring managers and recruiters to determine appropriate outreach to attract qualified applicant pools;
  - Recruiting at colleges and universities with a significant percentage of minority and female students;
  - Publishing job advertisements in newspapers and/or magazines that target females and/or minorities;
  - Offering job training to females and minorities currently employed at TCAT - Jacksboro in order to increase their chances of advancement;
  - Offering tuition waivers and reimbursement to employees to obtain training that will increase their chances of advancement; and
  - Continuing to use the services of Jobs4TN and other state employment services.
2. **Review of Employment Decisions:** Review of employment decisions is made in order to determine whether or not females/minorities are selected at a less favorable rate than males/non-minorities. A review of males/non-minorities is also conducted to determine if either group is being selected at a statistically significant lessor rate than females/minorities.
  3. **Review of Hires/Promotions:** Whenever females/minorities are selected at a lower rate than males/non-minorities, a review of the applicant flow is conducted to determine possible reasons why females/minorities were not selected at a more favorable rate. If the institution is attracting fewer than expected females/minorities that fit the qualifications for the job groups, good faith efforts will be put into place to attempt to improve the applicant flow of qualified females/minorities. If males/non-minorities are selected at a statistically significantly lessor rate than females/minorities, a review of the applicant flow and selection decisions is also made to ensure that there is no evidence of discrimination.
  4. **Review of Terminations:** For terminations, if females/minorities are being involuntarily terminated or are voluntarily leaving at a higher rate than males/non-minorities, a review of the employee files will be made to ensure the institution is applying its policies and procedures for termination equally for protected as well as non-protected classes. If males/non-minorities have a statistically significant higher rate of termination than females/minorities, an investigation will also be conducted to determine the cause.
  5. **Compensation:** Compensation is reviewed at least annually in order to determine if there are significant discrepancies in pay when comparing female to male rates of pay and minority versus non-minority rates of pay. If discrepancies do exist, a thorough review is conducted to determine if the difference in pay is justified due to appropriate factors. If the difference in pay cannot be justified, TCAT - Jacksboro will put a plan in place to bring pay into



greater alignment. TCAT – Jacksboro utilizes the annual TCAT Job Families and Ranges salary guidelines developed by the System Office. New hires are hired at the mid-point level based on the job classification.

## Workforce Analysis

Area: Institutional Support

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Departments/Accounts within Area: Administrative and Business Office

As of July 2015

LIST ALL JOB TITLES WITHIN AREA

Job Title	EEO Category	Total # of Empl.	Total Male	MALE					Total Female	FEMALE					Salary/ Grade
				W	B	H	A	AI		W	B	H	A	AI	
Interim Director	1	1							1	1					8A
Account Clerk II	4	1							1	1					6B
Business Office Technician	4	1							1	1					6B
DEPARTMENT TOTALS		3	0	0	0	0	0	0	3	3	0	0	0	0	

Executive, Administrative and Managerial;  
Faculty; Other Professionals:

Below \$20,000	1A
\$20,000 - \$24,999	2A
\$25,000 - \$29,999	3A
\$30,000 - \$34,999	4A
\$35,000 - \$39,999	5A
\$40,000 - \$44,999	6A
\$45,000 - \$54,999	7A
\$55,000 AND UP	8A

Clerical/Secretarial; Technical &  
Paraprofessionals, Skilled Crafts:

Below \$12,000	1B
\$12,000 - \$15,999	2B
\$16,000 - \$19,999	3B
\$20,000 - \$24,999	4B
\$25,000 - \$29,999	5B
\$30,000 AND ABOVE	6B

Total	3	100.0%
Female	3	
Black	0	
Other	0	



## Workforce Analysis

Area: Instruction

Page 2 of 4

Departments/Accounts within Area: Instruction

As of July 2015

LIST ALL JOB TITLES WITHIN AREA

Job Title	EEO Category	Total # of Empl.	MALE						Total Female	FEMALE					Salary/ Grade
			Total Male	W	B	H	A	AI		W	B	H	A	AI	
Master Instructor	2	1	1	1											8A
Senior Instructor	2	5	3	3					3	3					7A/8A
Instructor	2	2	0	0					1	1					7A
Associate Instructor	2	1	1	1					0	0					6A
DEPARTMENT TOTALS		9	5	5	0	0	0	0	4	4	0	0	0	0	

Executive, Administrative and Managerial;  
Faculty; Other Professionals:

Below \$20,000	1A
\$20,000 - \$24,999	2A
\$25,000 - \$29,999	3A
\$30,000 - \$34,999	4A
\$35,000 - \$39,999	5A
\$40,000 - \$44,999	6A
\$45,000 - \$54,999	7A
\$55,000 AND UP	8A

Clerical/Secretarial; Technical &  
Paraprofessionals, Skilled Crafts:

Below \$12,000	1B
\$12,000 \$15,999	2B
\$16,000 \$19,999	3B
\$20,000 \$24,999	4B
\$25,000 \$29,999	5B
\$30,000 AND ABOVE	6B

Total	9	44.4%
Female	4	
Black	0	
Other	0	

## Workforce Analysis

Area: Student Services										Page 3 of 4					
Departments/Accounts within Area: Student Services										As of July 2015					
LIST ALL JOB TITLES WITHIN AREA															



## Workforce Analysis

Area: Operations and Maintenance											Page 4 of 4				
Departments/Accounts within Area: Maintenance/Facilities											As of July 2015				
LIST ALL JOB TITLES WITHIN AREA															
				MALE						FEMALE					
Job Title	EEO Category	Total # of Empl.	Total Male	W	B	H	A	AI	Total Female	W	B	H	A	AI	Salary/ Grade
Maintenance Supervisor	7	1	1	1					0	0					6B
Custodian	7	1							1	1					1B
DEPARTMENT TOTALS		2	1	1	0	0	0	0	1	1	0	0	0	0	
Executive, Administrative and Managerial; Faculty; Other Professionals:				Cleric/Secretarial; Technical & Paraprofessionals, Skilled Crafts:				Total				2	50.0%		
Below \$20,000	1A			Below	\$12,000	1B					Female	1			
\$20,000 - \$24,999	2A			\$12,000	\$15,999	2B					Black	0			
\$25,000 - \$29,999	3A			\$16,000	\$19,999	3B					Other	0			
\$30,000 - \$34,999	4A			\$20,000	\$24,999	4B									
\$35,000 - \$39,999	5A			\$25,000	\$29,999	5B									
\$40,000 - \$44,999	6A			\$30,000	AND ABOVE	6B									
\$45,000 - \$54,999	7A														
\$55,000 AND UP	8A														

## Job Group Analysis

EEO Category: 1

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Job Group Analysis: Executive, Managerial, Administrative

As of July 2015

Job Title	EEO	Salary/ Grade	Total # of Empl.	Total Male	MALE					Total Female	FEMALE				
					W	B	H	A	AI		W	B	H	A	AI
Interim Director	1	8A	1							1	1				
TOTALS			1	0	0	0	0	0	0	1	1	0	0	0	0

W = White  
 B = Black  
 H = Hispanic  
 A = Asian  
 AI = American Indian

Total	Female	1	100.0%
	Black	0	
	Other	0	

## Job Group Analysis

EEO Category: 2

Job Group Analysis: Faculty

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As of July 2015

Job Title	EEO	Salary/ Grade	Total # of Empl.	Total Male	MALE					Total Female	FEMALE				
					W	B	H	A	AI		W	B	H	A	AI
Master Instructor	2	8A	1	1	1										
Senior Instructor	2	7A/8A	5	3	3					3	3				
Instructor	2	7A	2							1	1				
Associate Instructor	2	6A	1	1	1										
TOTALS			9	5	5	0	0	0	0	4	4	0	0	0	0

W = White

B = Black

H = Hispanic

A = Asian

AI = American Indian

Total	Female	4	44.4%
	Black	0	
	Other	0	



## Job Group Analysis

EEO Category: 3

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Job Group Analysis: Professional Non-Faculty

As of July 2015

Job Title	EEO	Salary/ Grade	Total # of Empl.	Total Male	MALE					Total Female	FEMALE				
					W	B	H	A	AI		W	B	H	A	AI
Student Services Coordinator	3	8A	1							1	1				
TOTALS			1	0	0	0	0	0	0	1	1	0	0	0	0

W = White  
 B = Black  
 H = Hispanic  
 A = Asian  
 AI = American Indian

Total	Female	1	100.0%
	Black	0	
	Other	0	

## Job Group Analysis

EEO Category: 4

Job Group Analysis: Clerical and Secretarial

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As of July 2015

Job Title	EEO	Salary/ Grade	Total # of Empl.	Total Male	MALE					Total Female	FEMALE				
					W	B	H	A	AI		W	B	H	A	AI
Account Clerk II	4	6B	1							1	1				
Business Office Technician	4	6B	1							1	1				
Student Services Assistant	4	6B	1							1	1				
Clerk Receptionist	4	5B	1							1	1				
TOTALS			4	0	0	0	0	0	0	4	4	0	0	0	0

W = White

B = Black

H = Hispanic

A = Asian

AI = American Indian

Total	Female	4	100.0%
	Black	0	
	Other	0	



## Job Group Analysis

EEO Category: 5

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Job Group Analysis: Technical/Para-professional

As of July 2015

Job Title	EEO	Salary/ Grade	Total # of Empl.	Total Male	MALE					Total Female	FEMALE				
					W	B	H	A	AI		W	B	H	A	AI
NONE															
TOTALS			0	0	0	0	0	0	0	0	0	0	0	0	0

W = White  
 B = Black  
 H = Hispanic  
 A = Asian  
 AI = American Indian

Total    Female    0  
              Black    0  
              Other    0

## Job Group Analysis

EEO Category: 6

Job Group Analysis: Skilled Craft

Page 6 of 7

As of July 2015

Job Title	EEO	Salary/ Grade	Total # of Empl.	Total Male	MALE					Total Female	FEMALE				
					W	B	H	A	AI		W	B	H	A	AI
NONE															
TOTALS			0	0	0	0	0	0	0	0	0	0	0	0	0

W = White

B = Black

H = Hispanic

A = Asian

AI = American Indian

Total	Female	0
	Black	0
	Other	0



## Job Group Analysis

EEO Category: 7

Job Group Analysis: Service/Maintenance

Page 7 of 7

As of July 2015

Job Title	EEO	Salary/ Grade	Total # of Empl.		MALE						FEMALE				
				Total Male	W	B	H	A	AI	Total Female	W	B	H	A	AI
Maintenance Supervisor	7	6B	1	1	1										
Custodian	7	1B	1							1	1				
TOTALS			2	1	1	0	0	0	0	1	1	0	0	0	0

W = White

B = Black

H = Hispanic

A = Asian

AI = American Indian

Total	Female	1	50.0%
	Black	0	
	Other	0	

CIVILIAN LABOR FORCE																
As of 2015																
TCAT Jacksboro																
FACTOR 4																
FACTOR 3			Exec./Admin		Faculty		Prof. Non-		Clerical/		Tech/Par.		Skilled Crafts		Ser/Maint.	
			Managerial		Pre/Pro Craft		Faculty		Secretarial		Tech/Tech		Pre/Pro		Cleaning	
					Repair Occ.		Ex, Adm, Man.						Repair Oc.		Bldg. Occ.	
COUNTIES	Non-White	Female	N/W	Fem.	N/W	Fem.	N/W	Fem.	N/W	Fem.	N/W	Fem.	N/W	Fem.	N/W	Fem.
Anderson	6.7%	47.0%	5.4%	26.1%	12.1%	64.3%	6.6%	37.3%	5.4%	79.1%	8.2%	34.5%	7.2%	25.9%	13.0%	36.9%
Campbell	2.1%	43.9%	0.0%	46.3%	0.0%	72.1%	3.2%	41.4%	0.0%	73.6%	0.0%	21.6%	1.9%	32.7%	3.5%	40.3%
Claiborne	2.1%	45.6%	0.0%	24.0%	0.0%	63.0%	0.0%	29.9%	2.1%	77.0%	0.0%	52.0%	4.3%	28.9%	4.3%	42.5%
Scott	1.6%	43.1%	8.2%	11.5%	0.0%	38.9%	2.4%	30.9%	2.2%	79.5%	0.0%	18.5%	0.0%	35.1%	0.0%	28.8%
<b>TOTAL</b>	12.5%	179.6%	13.6%	107.9%	12.1%	238.3%	12.2%	139.5%	9.7%	309.2%	8.2%	126.6%	13.4%	122.6%	20.8%	148.5%
<b>AVERAGE</b>	3.1%	44.9%	3.4%	27.0%	3.0%	59.6%	3.1%	34.9%	2.4%	77.3%	2.1%	31.7%	3.4%	30.7%	5.2%	37.1%
*Based on latest available statistics																



# AVAILABILITY FACTOR COMPUTATION FORM

EEO CATEGORY: 1

JOB TITLE: See Job Group Analysis

JOB GROUP: Executive

AAP YEAR: 2015

Column 2 X Column 3 = Column 4

INSTITUTION: TCAT Jacksboro

1	2			3	4			5
	Raw Statistics %			Value Weight	Weighted Factor			Source and Reason for Statistics and Weight Factor
	FEM	UNDER			FEM	UNDER		
Percentage of underrepresented groups and women among those having requisite skills in an area where the employer can reasonably recruit.	27	3.2		0.8	35.8%	2.7%		2000 Census Data; Affirmative Action Data Supplement 2015
Percentage of underrepresented group and females among those promotable, transferable, or trainable in the institution.	50	0		0.2	40.0%	0.0%		TCAT Jacksboro Personnel Records
Final Percent Availability					75.8%	2.7%		

# AVAILABILITY FACTOR COMPUTATION FORM

EEO CATEGORY: 2

JOB TITLE: See Job Group Analysis

JOB GROUP: Faculty

AAP YEAR: 2015

Column 2 X Column 3 = Column 4

INSTITUTION: TCAT Jacksboro

1	2			3	4			5
	Raw Statistics %			Value Weight	Weighted Factor			Source and Reason for Statistics and Weight Factor
	FEM	UNDER			FEM	UNDER		
Percentage of underrepresented groups and women among those having requisite skills in an area where the employer can reasonably recruit.	59.6	3		0.8	47.7%	2.4%		2000 Census Data; Affirmative Action Data Supplement 2015
Percentage of underrepresented group and females among those promotable, transferable, or trainable in the institution.	44.4	0		0.2	8.9%	0.0%		TCAT Jacksboro Personnel Records
Final Percent Availability					56.6%	2.4%		

# AVAILABILITY FACTOR COMPUTATION FORM

EEO CATEGORY: 3

JOB TITLE: See Job Group Analysis

JOB GROUP: Professional Non-Faculty

AAP YEAR: 2015

Column 2 X Column 3 = Column 4

INSTITUTION: TCAT Jacksboro

1	2			3	4			5
	Raw Statistics %			Value Weight	Weighted Factor			Source and Reason for Statistics and Weight Factor
	FEM	UNDER			FEM	UNDER		
Percentage of underrepresented groups and women among those having requisite skills in an area where the employer can reasonably recruit.	37.3	6.6		0.8	29.8%	5.3%		2000 Census Data; Affirmative Action Data Supplement 2015
Percentage of underrepresented group and females among those promotable, transferable, or trainable in the institution.	100	0		0.2	20.0%	0.0%		TCAT Jacksboro Personnel Records
Final Percent Availability					45.7%	2.5%		

# AVAILABILITY FACTOR COMPUTATION FORM

EEO CATEGORY: 4

JOB TITLE: See Job Group Analysis

JOB GROUP: Clerical and Secretarial

AAP YEAR: 2015

Column 2 X Column 3 = Column 4

INSTITUTION: TCAT Jacksboro

1	2			3	4			5
	Raw Statistics %			Value Weight	Weighted Factor			Source and Reason for Statistics and Weight Factor
	FEM	UNDER			FEM	UNDER		
Percentage of underrepresented groups and women among those having requisite skills in an area where the employer can reasonably recruit.	77.3	2.4		0.8	61.8%	1.9%		2000 Census Data; Affirmative Action Data Supplement 2015
Percentage of underrepresented group and females among those promotable, transferable, or trainable in the institution.	100	0		0.2	20.0%	0.0%		TCAT Jacksboro Personnel Records
Final Percent Availability					81.8%	1.9%		

# AVAILABILITY FACTOR COMPUTATION FORM

EEO CATEGORY: 5

JOB TITLE: See Job Group Analysis

JOB GROUP: Technical/Para-professional

AAP YEAR: 2015

Column 2 X Column 3 = Column 4

INSTITUTION: TCAT Jacksboro

1	2			3	4			5
	Raw Statistics %			Value Weight	Weighted Factor			Source and Reason for Statistics and Weight Factor
	FEM	UNDER			FEM	UNDER		
Percentage of underrepresented groups and women among those having requisite skills in an area where the employer can reasonably recruit.	31.7	2.1		0.8	25.4%	1.7%		2000 Census Data; Affirmative Action Data Supplement 2015
Percentage of underrepresented group and females among those promotable, transferable, or trainable in the institution.	0	0		0.2	0.0%	0.0%		TCAT Jacksboro Personnel Records
Final Percent Availability					25.4%	1.7%		

# AVAILABILITY FACTOR COMPUTATION FORM

EEO CATEGORY: 6

JOB TITLE: See Job Group Analysis

JOB GROUP: Skilled Craft

AAP YEAR: 2015

Column 2 X Column 3 = Column 4

INSTITUTION: TCAT Jacksboro

1	2			3	4			5
	Raw Statistics %			Value Weight	Weighted Factor			Source and Reason for Statistics and Weight Factor
	FEM	UNDER			FEM	UNDER		
Percentage of underrepresented groups and women among those having requisite skills in an area where the employer can reasonably recruit.	30.7	3.4		0.8	24.6%	2.7%		2000 Census Data; Affirmative Action Data Supplement 2015
Percentage of underrepresented group and females among those promotable, transferable, or trainable in the institution.	0	0		0.2	0.0%	0.0%		TCAT Jacksboro Personnel Records
Final Percent Availability					24.6%	2.7%		



# AVAILABILITY FACTOR COMPUTATION FORM

EEO CATEGORY: 7

JOB TITLE: See Job Group Analysis

JOB GROUP: Service/Maintenance

AAP YEAR: 2015

Column 2 X Column 3 = Column 4

INSTITUTION: TCAT Jacksboro

1	2			3	4			5
	Raw Statistics %			Value Weight	Weighted Factor			Source and Reason for Statistics and Weight Factor
	FEM	UNDER			FEM	UNDER		
Percentage of underrepresented groups and women among those having requisite skills in an area where the employer can reasonably recruit.	37.1	5.2		0.8	29.7%	4.2%		2000 Census Data; Affirmative Action Data Supplement 2015
Percentage of underrepresented group and females among those promotable, transferable, or trainable in the institution.	50	0		0.2	10.0%	0.0%		TCAT Jacksboro Personnel Records
Final Percent Availability					39.7%	4.2%		

## The Development and Execution of Action-Oriented Programs (41 CFR 60-2.17©)

TCAT – Jacksboro tailors our action-oriented programs each year to ensure they are specific to problems identified, if any. As reflected in the **AVAILABILITY FACTOR COMPUTATION FORMS** included in this plan, TCAT Jacksboro is located in a rural area of East Tennessee with a population that is primarily Caucasian, with males accounting for 55% of those employed in all occupations. The primary occupation categories within TCAT Jacksboro's service area are generally service related. Further analysis of employment data indicates female employment of 47% in Anderson County, 44% in Campbell County, 46% in Claiborne County, and 43% in Scott County, with an average of 45%. The minority civilian labor force accounts for 3.1% in the TCAT Jacksboro service area. Therefore, the availability of qualified, underrepresented, or protected category candidates available in TCAT Jacksboro's service area is extremely low.

In the coming years, TCAT – Jacksboro will be implementing more substantial action programs in an effort to further impact the diversity of its workforce. Plans will be developed not only to make good faith efforts to increase minority and female representation where underutilization exists, but also to address other problems identified in this plan.

For the current AAP cycle, the following programs have been instituted to ensure no barriers to employment exist. These programs include, but are not limited to, the following:

1. **Job Descriptions** – Making job descriptions available to recruiting sources and available to all members of management involved in the recruiting, screening, selection and promotion processes;
2. **Selection Process** – Reviewing all position announcements to ensure that they accurately reflect the position's essential functions, are not unduly restrictive in requirements, and are nondiscriminatory with respect to race, color, religion, sex, and national origin using the following actions:
  - a. All selection decisions are reviewed by the Affirmative Action Officer to ensure that they are fully documented and that preferential rehire status and special selection considerations for staff with disabilities have been implemented, as applicable;
  - b. Equal opportunity for employment shall be assured for men and women in job groups that have traditionally been identified with one sex; and
  - c. Evaluating the total selection process to ensure freedom from bias through reviewing job applications and other pre-employment forms to ensure information requested is job-related
3. **Outreach & Recruitment** – Using techniques to improve recruitment and retention and to increase the flow of qualified applicants, including minority and female applicants. To achieve this, TCAT – Jacksboro undertakes the following actions:
  - a. Includes the full non-discrimination statement, or other acceptable



- tagline in all printed employment advertisements;
- b. Disseminates information on job opportunities to organizations representing minorities and women;
- c. Advertising all staff recruitments extensively, including making special efforts to advertise in venues targeting underutilized groups;
- d. Assisting with specialized outreach efforts; and
- e. Encouraging employees to refer qualified applicants.
- 4. **Compensation** – Following's TBR's compensation practices and making periodic adjustments to align with Board approved compensation plans;
- 5. **Promotions** – Ensuring that all employees are given equal opportunity for promotions and/or transfers. This is achieved by:
  - a. Offering guidance to employees in identifying opportunities, training and educational programs to enhance promotions and opportunities for job rotation or transfer; and
  - b. Evaluating job requirements to ensure that they are appropriate.
- 6. **Compliance Communication** – Distributing Equal Employment Opportunity Commission (EEOC), Tennessee Human Rights Commission (THRC), and Americans with Disabilities Act (ADA) notices describing non-discrimination and equal employment opportunity laws to employees.
- 7. **Training Programs** – Offering training and development opportunities without regard to sex, race, disability, or protected veteran status. The Director is responsible for ensuring employees at TCAT – Jacksboro are given fair consideration for training and career development activities.

#### **Internal Audit and Reporting Systems (41 CFR 60-2.17(d))**

The TBR/TCAT - Jacksboro believes that one of the most important elements in effectively implementing a written Affirmative Action Program is an adequate internal audit and reporting system. Through this system, the total program can be monitored for effectiveness, and management can be kept informed. TCAT – Jacksboro's audit and reporting system is designed to:

- 1. Measure the effectiveness of the AAP/EEO program;
- 2. Document and analyze personnel activities;
- 3. Identify problem areas and develop action plans where remedial action is needed; and
- 4. Determine the degree to which AAP goals and objectives have been attained.

The following personnel activities are reviewed, as necessary and desirable, to ensure nondiscrimination and EEO for all individuals without regard to their protected class as defined by federal, state and TBR/TCAT – Jacksboro equal employment opportunity regulations:

- 1. Recruitment, advertising, and job application procedures;
- 2. Hiring, promotion, upgrading;
- 3. Rates of pay and any other forms of compensation including fringe benefits;



4. Job assignments, job classifications, and job descriptions;
5. Sick leave, leaves of absence, or any other leave;
6. Training, attendance at professional meetings and conferences; and
7. Any other term, condition, or privilege of employment.

The following documents may be maintained as a component of TCAT – Jacksboro's internal audit process:

1. An applicant flow log;
2. Summary data of external job offers and hires, promotions, resignations, terminations;
3. Summary data of applicant flow;
4. Employment applications; and
5. Records pertaining to agency's compensation system and decisions.

TCAT - Jacksboro's audit system includes periodic review of employment decisions. The Director is asked to report any current or foreseeable EEO problem areas and asked to outline any suggestions/recommendations for solutions. If problem areas arise, the Director is to report problem areas immediately to the Affirmative Action Officer. During the reporting cycle, the following occurs:

1. The Affirmative Action Officer will discuss any problems relating to significant rejection ratios, EEO charges, etc., with the Director; and
2. The Affirmative Action Officer will report the status of the college's AAP goals and objectives to the Director. The Affirmative Action Officer will recommend remedial actions for the effective implementation of the AAP.

## **PART II: AFFIRMATIVE ACTION PROGRAM FOR INDIVIDUALS WITH DISABILITIES & PROTECTED VETERANS**

### **EQUAL EMPLOYMENT OPPORTUNITY STATEMENT OF POLICY (41 CFR 60-741.44(a))**

It is the policy of the Tennessee Board of Regents/TCAT - Jacksboro not to discriminate against any employee or applicant for employment because of their race, color, religion, sex, national origin, political affiliation, genetic information or because they are an individual with a disability or disabled veteran, Armed Forces service medal veteran, recently separated veteran, or active duty wartime or campaign badge veteran, or thereafter referred collectively as "protected veterans." It is also the policy of the Tennessee Board of Regents/TCAT - Jacksboro to take affirmative action to employ and to advance in employment, all persons regardless of their status as individuals with disabilities or protected veterans, and to base all employment decisions only on valid job requirements. This policy shall apply to all employment actions, including but not limited to recruitment, hiring, upgrading, promotion, transfer, demotion, recall, termination, rates of pay or other forms of compensation and selection for training at all levels of employment.

Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion or discrimination because they have engaged in or may engage in filing a complaint or assisting or participating in an investigation, compliance evaluation, hearing, or any other activity related to the administration of Section 503 of the Rehabilitation Act of 1973, as amended (Section 503), Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended (VEVRAA), or any other Federal, State or local law requiring equal opportunity for individuals with disabilities and protected veterans.

Decisions related to personnel policies and practices are made on the basis of an individual's capacity to perform a particular job and the reasonableness of any necessary job accommodation. TCAT - Jacksboro will make every effort to provide reasonable accommodations to any physical and mental limitations of individuals with a disability and to disabled veterans. Our obligations in this area stem from not only adherence to various state and federal regulations, but also from our commitment as an employer in this state to provide job opportunities to protected veterans and individuals with a disability.

This Affirmative Action Program is available for inspection by any employee or applicant for employment upon request between 8:00 am - 4:30 pm at the TCAT - Jacksboro Administrative Office located at 265 Elkins Rd, Jacksboro, TN 37757. Any questions should be directed to Debbie Petree, Interim Director or Rita G. Broyles, Affirmative Action Officer.

#### **I. Applicability of the Affirmative Action Program**

TCAT - Jacksboro is committed to adherence to Sections 503 of the Rehabilitation Act of 1973, as amended, the Americans with Disabilities Act of 1990, and the



Vietnam-Era Veterans' Readjustment Assistance Act of 1974, as amended (38 USC 4212).

It is the policy of TCAT - Jacksboro not to engage in discrimination against or harassment of any person employed or seeking employment with TCAT -Jacksboro, based on a variety of factors including physical or mental disability or status as a protected veteran. Any applicant or employee who believes s/he has been discriminated against or harassed due to her/his disability or status as a qualified protected veteran can file a complaint with TCAT – Jacksboro's Affirmative Action Officer.

The TBR/TCAT - Jacksboro nondiscrimination and affirmative action policies are widely disseminated both internally and externally. TCAT - Jacksboro is committed to equal employment opportunity and affirmative action for the following:

**A. Individuals with a Disability**

Under the Federal Regulations, (1) the term disability means, with respect to an individual: a physical or mental impairment that substantially limits one or more major life activities of such individual; (ii) a record of such impairment; or (iii) being regarded as having such an impairment. (2) the definition of "disability must be construed in favor of broad coverage of individuals to the maximum extent permitted by law. The question of whether an individual meets the definition under this part should not demand extensive analysis. (3) an impairment that substantially limits one major life activity need not limit other major life activities in order to be considered a disability. (4) an impairment that is episodic or in remission is a disability if it would substantially limit a major life activity when active.

With respect to employment, these laws and TBR/TCAT - Jacksboro policies protect any qualified person with a disability. A qualified individual with a disability means an individual with a disability who satisfies the requisite skill, experience, education and other job-related requirements of the employment position such individual holds or desires, and who, with or without reasonable accommodation, can perform the essential functions of such position.

**B. Active Duty Wartime or Campaign Badge Veterans**

A veteran who served on active duty in the U.S. military, ground, naval or air service during a war or in a campaign or expedition for which a campaign badge has been authorized, under the laws administered by the Department of Defense.

**C. Armed Forces Service Medal Veteran**

Any veteran who, while serving on active duty in the U.S. military, ground, naval or air service, participated in a United States military operation for which an Armed Forces service medal was awarded pursuant to Executive Order 12985 (61 FR 1209).



**D. Disabled Veteran**

A veteran of the U.S. military, ground, naval or air service who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs, or a person who was discharged or released from active duty because of a service-connected disability.

**E. Recently Separated Veteran**

Any veteran during the three year period beginning on the date of such veteran's discharge or release from active duty in the U.S. military, ground, naval or air service.

**F. Special Disabled Veteran**

A veteran who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Department of Veterans Affairs for a disability: (A) rated at 30 percent or more; or (B) rated at 10 or 20 percent in the case of a veteran who has been determined under 39 U.S.C. 3106 to have a serious employment handicap; or (ii) a person who was discharged or released from active duty because of a service-connected disability.

**G. Veteran**

A person who served in the active military, naval or air service of the United States, and who was discharged or released therefrom under conditions other than dishonorable.

**H. Vietnam Era Veteran**

A person who: (i) served on active duty for a period of more than 180 days, and was discharged or released therefrom with other than a dishonorable discharge, if any part of such active duty occurred: (A) in the Republic of Vietnam between February 28, 1961 and May 7, 1975; or (B) between August 5, 1964 and May 7, 1975, in all other cases, or (ii) was discharged or released from active duty for a service connected disability if any part of such active duty was performed: (A) in the Republic of Vietnam between February 28, 1961 and May 7, 1975; or (B) between August 5, 1964 and May 7, 1975, in all other cases.

**II. Responsibility for Implementation (41 CFR 60-741.44(i))**

**A. Responsibilities of EEO Coordinator:**

Rita G. Broyles, Affirmative Action Officer is responsible for the overall execution, implementation and monitoring of the Affirmative Action Program for persons with a disability and protected veterans with the support of all management. The Affirmative Action Officer has full support from the Director needed to manage the implementation of the program.

Those responsibilities shall include, but not be limited to, the following:

1. The development of the AAP for individuals with disabilities, policy statements, personnel policies and procedures, internal and external communication of the policy, and monitoring the effectiveness of these actions;
2. Reviewing all personnel actions, policies, and procedures to ensure compliance with Tennessee Board of Regents'/TCAT – Jacksboro's Affirmative Action policies;
3. Reviewing the qualifications of all applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner when hiring, promotion, transfer and termination actions occur;
4. Assisting in the identification of problem areas and the development of solutions to those problems;
5. Monitoring the effectiveness of the program on a continuing basis through the development and implementation of an internal audit- and reporting-system that measures the effectiveness of the program
6. Keeping the Director informed of equal opportunity progress and problems within the institution through, at a minimum, periodic reports;
7. Providing employees with a copy of the AAP and reviewing the program with them on an annual basis to ensure knowledge of their responsibilities for implementation of the program;
8. Reviewing the institution's AAP for individuals with disabilities and protected veterans with all managers and supervisors at all levels to ensure that the policy is understood and is followed in all personnel activities;
9. Auditing the contents of institution bulletin boards annually to ensure that compliance information is posted and is up-to-date;
10. Serving as a liaison between Tennessee Board of Regents, TCAT - Jacksboro and enforcement agencies; and
11. Serving as a liaison between Tennessee Board of Regents, TCAT - Jacksboro and organizations for individuals with disabilities and those for protected veterans.

#### **Responsibilities of Managers and Supervisors:**

Supervisors are advised annually of their responsibilities under the college's AAP for individuals with disabilities and protected veterans and of their obligations to:

1. Review the institution's Affirmative Action policy with supervisors to ensure that they are aware of the policy and understand their obligation to comply with it in all personnel actions;
2. Assist in the identification of problem areas, formulate solutions, and establish departmental goals and objectives when necessary;
3. Review the qualifications of all applicants and employees to ensure individuals with disabilities and protected veterans are treated in a nondiscriminatory manner when hire, promotion, transfer, and termination



- actions occur; and
4. Review all employees' performance to ensure that non-discrimination is adhered to in all personnel activities.

### **III. Review of Personnel Processes (41 CFR 60-741.44(b))**

To guarantee that individuals with disabilities and protected veterans are treated equitably in all areas of employment, TBR and TCAT - Jacksboro periodically reviews their employment processes to ensure it provides careful, thorough, and systematic consideration of the job qualifications of applicants and staff with known disabilities for job vacancies filled by hiring or promotion, and for all training opportunities. Affirmative action outreach and recruitment efforts are undertaken for individuals with disabilities and for protected veterans. In addition, TCAT - Jacksboro relies only on the portion of the military record that is relevant to the requirement of the job and does not stereotype protected veterans or disabled persons or limit access to jobs for which they are qualified. All search committee chairs and hiring supervisors involved in selection decisions and other decisions about staff are informed of TCAT - Jacksboro's EEO/AA policy for individuals with disabilities and protected veterans.

TCAT - Jacksboro will implement processes and procedures to adhere to the final regulations for individual with disability and veterans in order to collect and maintain records of applicants and hires whom self-identify as an individual with disability or veteran. TCAT - Jacksboro currently maintains affirmative action data on its employees, including those who have self-identified their veteran or disability status. It also keeps hire, promotion, transfer, and separation data for employees and data regarding changes in their titles and/or departments as a result of these activities. If disparities are identified, TCAT - Jacksboro will undertake necessary action to address and remedy the identified problem. Individuals with known disabilities and protected veterans have the opportunity to participate in all TCAT - Jacksboro sponsored educational, training, recreational, and social activities.

### **IV. Physical and Mental Qualifications (41 CFR 60-741.44(c))**

TCAT - Jacksboro reviews every new or revised job description to ensure that all requirements for jobs are job-related, consistent with business necessity, and are not unduly restrictive. In addition, all job position descriptions note that requirements refer to ability to perform essential tasks with or without reasonable accommodation.

TCAT - Jacksboro will continue to review physical and mental job qualification requirements whenever a job is vacated and the agency intends to fill it through hiring, promotion or transfer and will conduct a qualifications review whenever job duties change or a change in work environment occurs.

If at any time TCAT - Jacksboro should inquire into an employee's physical or mental condition or should conduct a medical examination prior to a change in employment status, TCAT - Jacksboro affirms that information obtained as a result



of the inquiry will be kept confidential, except as otherwise provided for in Section 503 of the Rehabilitation Act of 1973 regulations. The results of the examination or inquiry will be used in accordance with the aforementioned regulations:

1. Supervisors, managers, and company officials may be informed regarding restrictions and accommodations for the work or duties of individuals with a disability.
2. OFCCP officials investigating compliance with either the 1973 Rehabilitation Act or VEVRAA, as amended.

Further, if TCAT - Jacksboro ever applies physical or mental qualification standards in the selection of applicants or employees for employment or other change in employment status such as promotion, demotion or training, to the extent that qualification standards tend to screen out qualified disabled veterans, the standards shall be related to the specific job or jobs for which the individual is being considered and consistent with business necessity.

**V. Reasonable Accommodation to Physical and Mental Limitations (41 CFR 60-741.44(d))**

TCAT - Jacksboro makes known to applicants for employment and to staff the availability of reasonable accommodation during the application process and on the job. As required by law, TCAT - Jacksboro commits to making reasonable accommodations for the disability-related needs of applicants for employment and staff who are eligible under the Americans with Disabilities Act, unless it can be demonstrated that such accommodations impose undue hardship on the operation of agency business.

If an employee with a known disability is having significant difficulty performing his or her job and it is reasonable to conclude that the performance problem may be related to the known disability, the employee will confidentially be notified of the performance problem and the manager may inquire whether the problem is related to the employee's disability. If the employee responds affirmatively, the company will confidentially inquire whether the employee is in need of a reasonable accommodation.

In determining the extent of the company's accommodation obligations, the following factors, among others, are considered:

1. Business necessity; and
2. Financial cost and expense.

Each applicant or employee's case is reviewed on an individual basis. Reasonable accommodations are made whenever possible. TCAT - Jacksboro makes every effort to provide suitable employment for those employees who become disabled while employed with the agency.

**VI. Harassment Prevention Procedures and Prohibition Against Retaliation (41 CFR 60-741.44(e))**

Employees and applicants of TCAT - Jacksboro will not be subject to harassment, intimidation, threats, coercion, or discrimination because they have engaged or may engage in filing a complaint, assisting in a review, investigation, or hearing or have otherwise sought to obtain their legal rights related to any Federal, State, or local law regarding EEO for individuals with disabilities or protected veterans. Any applicant or employee who believes s/he has been discriminated against or harassed due to her/his disability or status as a protected veteran can file a complaint with the Affirmative Action Officer.

**VII. External Dissemination of Policy, Outreach, and Positive Recruitment (41 CFR 60-741.44(f))**

TCAT - Jacksboro undertakes appropriate outreach and positive recruitment activities that are reasonably designed to effectively recruit qualified individuals with disabilities and protected veterans.

The following organizations are contacted in order to fulfill TCAT – Jacksboro's commitment to provide equal employment opportunity for individuals with disabilities:

1. The State Vocational Rehabilitation Service Agency (SVRA), State mental health agency, or State developmental disability agency;
2. The Employment One-Stop-Career Center or American Job Center;
3. The Department of Veterans Affairs Regional Office;
4. The Employer Assistance and Resource Network (EARN);
5. Local Employment Network organizations listed in the Social Security Administration's Ticket to Work Employment Network Directory ([www.yourtickettowork.com/endir](http://www.yourtickettowork.com/endir));
6. Local disability groups, organizations, or Centers for Independent Living;
7. Placement or career offices of educational institutions that specialize in the placement of individuals with disabilities; and
8. Private recruitment sources or employment placement services that specialize in the placement of individuals with disabilities.

TCAT - Jacksboro also undertakes or considers the following activities in order to promote equal employment opportunities for individuals with disabilities:

1. In the event that educational institutions are utilized as part of the recruitment efforts, a special effort is made to reach students who are individuals with disabilities.
2. Participate in work-study programs for students, trainees, or interns with disabilities.
3. Other efforts are made to attract individuals with disabilities not currently in the work force who have requisite skills. The State and local agencies



supported by the U.S. Department of Education's Rehabilitation Services Administration, local Ticket-to-Work Employment Networks and other local chapters of groups or organizations that provide services for individuals with disabilities are contacted.

4. Whenever job openings are posted, the appropriate EEO tag line is utilized which indicates individuals with disabilities are invited to apply.

As part of the outreach and positive recruitment efforts for protected veterans, TCAT - Jacksboro will:

1. Incorporate special efforts to reach students who are protected veterans whenever the company reaches out to educational institutions;
2. Establish meaningful contacts with appropriate veterans' service organizations which serve protected veterans for purposes as advice, technical assistance, and referral of potential employees. Technical assistance from the resources described in this paragraph may consist of advice on proper placement, recruitment, training and accommodations contractors may undertake, but no such resource providing technical assistance shall have authority to approve or disapprove the acceptability of affirmative action programs;
3. Take positive steps to attract protected veterans not currently in the work force who have requisite skills and can be recruited through affirmative action measures. These persons may be located through the local chapters of veterans' organizations; In making hiring decisions, consider applicants who are known protected veterans for all available positions for which they may be qualified when the position(s) applied for is unavailable; and
4. Consider listing job openings with National Resource Directory's Veterans Job Bank.

At a minimum, the agency reviews the outreach and recruitment efforts over the affirmative action plan period to evaluate the effectiveness in identifying and recruiting qualified individuals with disabilities and protected veterans.

#### **VIII. Internal Dissemination of Policy (41 CFR 60-741.44(g))**

In an effort to promote Affirmative Action for individuals with a disability and protected veterans, TCAT - Jacksboro has developed internal communications that foster understanding, acceptance, and support among the agency's executive, management, and supervisory personnel. Additionally, all other TCAT - Jacksboro employees have been notified and encouraged to take the necessary action to aid the company in meeting its Affirmative Action obligations. TCAT - Jacksboro has informed its employees and applicants for employment of its commitment to engage in Affirmative Action to increase the employment opportunities for individuals with a disability and protected veterans.

TCAT - Jacksboro realizes that a strong outreach program is ineffective without the adequate internal support from management personnel and other employees. In order



to ensure greater employee cooperation and participation in the agency's Affirmative Action efforts, TCAT - Jacksboro has adopted and disseminated an internal policy. This policy's dissemination may include but is not limited to the following:

1. Copy of the AAP for Individuals with Disabilities and Protected Veterans will be made available for inspection to any employee or applicant upon request to promote understanding, acceptance and support;
2. Inform all employees and applicants of its commitment to engage in affirmative action to increase employment opportunities for individuals with disabilities and protected veterans;
3. Conduct special meetings with executive, management, and supervisory personnel to explain the intent of the policy and individual responsibility for effective implementation making clear the chancellor's support for the affirmative action policy;
4. Discuss the policy thoroughly in both employee orientation and management training programs;
5. All employees who believe they are an individual with a disability, as defined in Section 503 of the Rehabilitation Act of 1973, as amended, and those who believe they are a protected veteran under the EEO provisions of VEVRAA, as amended, have been invited to identify themselves if they wish to benefit under this Affirmative Action Program. Such invitation has been made known to all employee through the agency intranet.

#### **IX. Audit and Reporting Systems (41 CFR 60-741.44(h))**

The college has designed and implemented audit and reporting systems that:

1. Measure the effectiveness of the agency's affirmative action program;
2. Identify any problem areas where remedial action is needed;
3. If any problem areas are identified, TCAT - Jacksboro will undertake necessary action to bring the program into compliance;
4. Determine the degree to which the TCAT - Jacksboro's AAP goals and objectives have been attained;
5. Determine whether known individuals with disabilities and protected veterans have had the opportunity to participate in all college sponsored educational, training, recreational and social activities;
6. Measure the college's compliance with the affirmative action program's specific obligations;
7. Document the actions taken to comply with obligations mentioned above and retain these documents as employment records subject to recordkeeping requirements; and
8. The online and electronic application systems are reviewed to determine if they are accessible to individuals with disabilities. The website does have a prominent statement displayed which gives applicants with disabilities information on how to request an accommodation in order to apply if they are in need of assistance.

The following activities are reviewed at least annually to ensure freedom from stereotyping individuals with disabilities and/or protected veterans in any manner, including that which may limit their access to any job for which they are qualified:

1. Recruitment, advertising, and job application procedures;
2. Hiring, promotion, upgrading, layoff, recall from layoff;
3. Rates of pay and any other forms of compensation including fringe benefits.
4. Job assignments, job classifications, job descriptions, and seniority lists;
5. Sick leaves, leaves of absence, or any other leave;
6. Training, attendance at professional meetings and conferences; and
7. Any other term, condition, or privilege of employment.

TCAT – Jacksboro's audit system includes periodic reports documenting TCAT - Jacksboro's efforts to achieve its EEO/AAP responsibilities. Managers and supervisors are asked to report any current or foreseeable EEO problem areas and are asked to outline their suggestions/recommendations for solutions. During the reporting, the following occurs:

1. The Affirmative Action Officer will discuss any problems relating to significant rejection ratios, EEO charges, etc., with the director; and
2. The Affirmative Action Officer will report the status of the college's AAP goals and objectives to management. The Affirmative Action Officer will recommend remedial actions for the effective implementation of the AAP.

#### **X. Training (41 CFR 60-741.44(j))**

All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes shall be trained to ensure that the commitments in this Affirmative Action Program are implemented.