



**EQUAL EMPLOYMENT
OPPORTUNITY/AFFIRMATIVE
ACTION PLAN**

Plan year: 10/01/15 – 9/30/16

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INTRODUCTION

WCU was founded in 1889 to bring higher education and career opportunities to the western region of North Carolina. Western is one of sixteen public institutions of higher education that comprise the North Carolina University system. The campus is situated in Cullowhee, North Carolina in the southwestern corner of the state. Cullowhee is located near the foot of the Great Smoky Mountains, and is approximately 50 miles west of Asheville and approximately 150 miles northeast of Atlanta. The current total employment at Western as of October 1, 2014 is 1,471 (an increase of 16 employees from the previous year and 51 from 2013). For Fall Semester, 2015, there were 10,340 students enrolled with 20.1% identifying as minority. Currently the total minority workforce representation is 8.4% (an increase of 1.0% from 2014 and 2.4% from 2013) and 50.1% are female (unchanged from the previous year).

The university recruitment area for faculty and staff varies depending upon the type of vacancy. All recruited positions are advertised with the North Carolina Department of Employment Security and are also posted on the Western Carolina University web page at <https://jobs.wcu.edu>. In addition, at minimum, all Faculty and upper level administrative positions are advertised with HigherEdJobs.com and InsideHigherEd.com. Executive and professional positions (including faculty and select positions that require specialized recruitment efforts) are recruited nationally. The primary recruitment area for all other positions is comprised of the four-county region of Jackson, Macon, Haywood, and Transylvania counties.

Statistical Information

The statistical information pertaining to the University's workforce used throughout the Affirmative Action Plan is based on reports generated from a variety of automated files. The data reflects only permanent full-time and part-time employees, and is current as of October 1, 2015. Permanent full-time and part-time employees are defined as those employees who work at least twenty hours per week and at least nine months per year.

When making historical comparisons to the current workforce it is important to note the evolution of the institutions organizational structure. During the 2006-2007 plan year, for example, the university underwent a major reorganization within its academic units. As a result, the number of academic colleges increased from four to six. The current college structure (which was reported initially in the 2007-2008 Plan) is as follows: College of Business, College of Education & Allied Professions, College of Arts & Sciences, College of Health & Human Sciences, College of Fine and Performing Arts, and the Kimmel School of Construction Management and Technology. In addition, the reorganization resulted in the consolidation and relocation of several academic departments along with the creation of new departments. As a result of this reorganization, three new job groups were created to appropriately and accurately capture the university's workforce. The three new job groups are: Faculty, Kimmel School (200); Faculty, Fine & Performing Arts

(205); and Faculty, Health & Human Sciences (210). Additionally, as a result of a statewide career banding initiative which consolidated the majority of staff positions on campus into a banded classification system, the job group of Housekeeping (710) was abolished and consolidated into the Other Auxiliary Services (730) job group.

Teaching Faculty

The permanent full-time teaching faculty of the University during the Fall 2015 semester numbered 519 members (this is an increase of 7 over Fall 2014) and was recruited nationally. 48 percent of the teaching faculty were female (an increase of .9 percent from Fall 2014) and 8.3 percent were minorities (a decrease of .5 percent).

Administrators and Professional Staff

The University's executive group (Job Group 100) totaled 53 (an increase of 2 employees from Fall 2014). This group is comprised of 32.1% female (.4% increase) and 9.4% minority (.4% decrease). Among the professional staff (Job Group 300), 60.3% are women (.6% increase) and 11.3% are minorities (1.8% increase from 2014 and 2.98% increase from two years ago).

Staff

The University employs 579 support staff members (Job Groups 250, 260, 400, 500, 600, 720, and 730.) which is an increase of 2 employees from Fall 2014. This includes 48.2% female (1% decrease) and 6.9% minority (an increase of 2% from the previous year).

SECTION I

REAFFIRMATION OF EQUAL EMPLOYMENT OPPORTUNITY POLICIES 41 CFR 60-2.13(a) AND 2.20(a)

Statement of North Carolina Policy

It is the policy of the State of North Carolina to provide equal opportunity employment for all qualified persons and to prohibit discrimination in employment because of race, color, national origin, religion, sex, age, genetic information, disability, or political affiliation. In furtherance of this policy, the State of North Carolina and its various sub-divisions shall:

1. recruit, select, hire, place, train and promote persons in all job classifications without regard to race, color, national origin, religion, sex, age, genetic information, disability, or political affiliation;
2. base selection, hiring and promotion decisions on valid requirements and criteria which are job related and necessary upon entry at that level to perform the essential functions of the job;
3. administer all employment practices including compensation, benefits, promotion, training, tuition assistance, termination, transfer, demotion and reduction-in-force objectively and without regard to race, color, national origin, religion, sex, age, genetic information, disability, or political affiliation; and
4. provide, when necessary, reasonable accommodations for applicants' and/or employees' disabilities when doing so will enable them to successfully perform the essential functions of the job or benefit from training,
5. prohibit retaliatory actions against employees or applicants for employment who make charge of employment discrimination, testify, assist or participate, in any manner, in a hearing, proceeding or investigation of employment discrimination;
6. assure a work environment that is free from discrimination.

WESTERN CAROLINA UNIVERSITY EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT

Western Carolina University emphatically states that it will provide equal employment opportunities for all persons regardless of race, color, national origin, religion, sex, age, gender identity or expression, sexual orientation, genetic information, veteran status, disability, or political affiliation, except where religion, sex, or age are bona fide job related employment requirements. This is in keeping with Title VII of the Civil Rights Act of 1964 as amended, Executive Order 11246, as amended, the Rehabilitation Act of 1973, the Equal Pay Act of 1963, the Age Discrimination in Employment Act of 1968 as amended, the Civil Rights Restoration Act of 1988, NC G.S. 1126-16 as amended, the Americans with Disabilities Act of 1990, the Civil Rights Act of 1991, the Genetic Information Nondiscrimination Act (GINA) of 2008, and other applicable federal and state EEO and anti-discrimination laws or statutes.

In furtherance of this policy Western Carolina University will not tolerate retaliatory action of any kind taken by any employee of Western Carolina University against any other employee or applicant for employment because that person filed a complaint or charge of employment discrimination, testified, assisted or participated in any manner in a hearing, proceeding or investigation of employment discrimination.

To ensure that equal employment opportunity exists throughout the university, a results oriented equal employment opportunity program will be implemented to overcome the effects of past discrimination and to eliminate any artificial barriers to employment opportunities for all qualified individuals that may exist in any of our programs. All selection, hiring, and promotion decisions will be based on valid requirements that are job related and consistent with performance of the essential functions of the job.

This program shall ensure greater utilization of all persons by identifying the underutilized groups in the workforce (especially minority, female, qualified veterans and disabled workers) and making special efforts to increase their participation in recruitment, selection, hiring, promotion, compensation, performance appraisal, disciplinary and grievance procedures, separations, and reduction in force, and any other term, condition, or privilege of employment. When necessary, Western Carolina University will provide reasonable accommodations for applicants and/or employees with disabilities when doing so will enable them to successfully perform the essential job functions of the job or benefit from training. WCU is also committed to preventing any harassment based on race, color, national origin, religion, sex, age, gender identity or expression, sexual orientation, genetic information, veteran's status or disability including sexual harassment.

Program objectives and timetables shall be established to reduce and eliminate the underutilization of all groups through the equal employment opportunity plan and program. Responsibility for the development of this plan and program is assigned to the Associate Vice Chancellor for Human Resources. However, responsibility for the implementation of the EEO compliance program will be shared by all managers and supervisors.

The equal employment opportunity program will be evaluated and monitored continuously. Periodic reports on the progress of this program will be presented to the Chancellor by the Associate Vice Chancellor for Human Resources and/or the Chief Diversity Officer.

Western Carolina University is committed to this program and is aware that with its implementation, positive benefits will be received from the greater utilization and development of previously underutilized human resources.

QUALIFIED INDIVIDUALS WITH DISABILITIES AND QUALIFIED PROTECTED VETERANS POLICY AND PLAN

Under the Affirmative Action obligations imposed by Section 503 of the Rehabilitation Act of 1973 and Vietnam Era Veterans' Readjustment Assistance Act of 1974 (VEVRAA), as amended, it is the policy of Western Carolina University to provide Equal Employment Opportunities and to advance in employment qualified individuals with a disability as well as qualified protected veterans. This policy is designed to employ and advance all qualified individuals with a disability and qualified protected veterans at all levels of employment. Western Carolina University's policy of providing Equal Employment Opportunities to qualified persons with a disability and qualified protected veterans shall apply to all employment practices including, but not limited to: upgrading, demotion or transfer, layoff or termination, rates of pay or other forms of compensation, and selection for training. Western Carolina University attempts to comply with all of the rules, regulations, and relevant orders of the Secretary of Labor and the Office of Federal Contract Compliance Programs (OFCCP), issued pursuant to Section 503 of the 1973 Rehabilitation Act and the 1974 Vietnam Era Veterans' Readjustment Assistance Act, as amended.

Western Carolina University's Affirmative Action Program for qualified persons with a disability and qualified protected veterans is reviewed and updated annually. If there are any significant changes in procedure, or if employee rights or benefits are modified as a result of an annual updating, these changes are communicated to employees and to applicants for employment.

On a strictly voluntary basis, Western Carolina University invites all qualified protected veterans who are either employees or applicants for employment, and employees who have a disability, and who wish to benefit under the University's Affirmative Action Program to self-identify. Any individual who identifies himself/herself will not be subjected to any form of harassment or retaliation based on his/her status or self-identification. Further, this self-identification will be kept confidential.

Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion or discrimination because they have engaged in or may engage in any of the following activities: (1) filing a complaint; (2) assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of Section 503 of the Rehabilitation Act of 1973, as amended, VEVRAA, as amended, or any other Federal, State or local law requiring equal opportunity for disabled persons or qualified protected veterans or; (3) opposing any act or practice made unlawful by Section 503 of the Rehabilitation Act of 1973, VEVRAA or its implementing regulations in this part or any other Federal, State or local law requiring equal opportunity for disabled persons or for qualified protected veterans; or (4) exercising any other right protected by Section 503 of

the Rehabilitation Act of 1973, or its implementing regulations in this part or any other right protected by VEVRAA or its implementing regulations in this part.

The target veteran groups include:

1. Disabled Veteran;
2. Veterans who served on active duty in the Armed Forces during a war or in a campaign or expedition for which a campaign badge has been authorized;
3. Veterans who, while serving on active duty in the Armed Forces, participated in a United States military operation for which an Armed Forces Service Medal was awarded pursuant to Executive Order No. 12985;
4. Recently Separated Veterans.

Review of Personnel Processes

Western Carolina University reviews annually its personnel processes to determine whether its present procedures ensure careful, thorough and systematic consideration of the qualifications of known qualified individuals with disabilities and qualified protected veterans. This review covers all procedures related to the filling of job vacancies either by hire or promotion, as well as all training opportunities offered or made available to employees.

In determining the qualifications of veterans, Western Carolina University limits its consideration of a qualified protected veteran's military record, including discharge papers, to only that portion of the record which is relevant to the specific job qualifications for which the veteran is being considered.

Based upon Western Carolina University's review of its personnel processes, the University will modify the personnel processes when necessary, and will include the development of new procedures in the Affirmative Action Program to ensure equal employment opportunity.

Review of Physical and Mental Job Qualification Standards

Western Carolina University commits to reviewing the physical and mental job qualifications of all positions during the respective plan year to ensure that, to the extent that such qualification requirements tend to screen out qualified individuals with disabilities and qualified disabled veterans, job qualifications are consistent with business necessity and the safe performance of the job.

No qualification requirements were identified which had a screening effect. All job qualification requirements were found to be job-related and consistent with business necessity and safety.

Western Carolina University will continue to review physical and mental job qualification requirements whenever a job is vacated and the university intends to fill it through hiring, promotion or transfer and will conduct a qualifications review whenever job duties change.

If at any time Western Carolina University should inquire into an employee's physical or mental condition or should conduct a medical examination prior to a change in employment status, Western Carolina University affirms that information obtained as a result of the inquiry will be kept confidential, except as otherwise provided for in the Section 503 regulations. The results of the examination or inquiry will be used in accordance with the Section 503 regulations.

Reasonable Accommodation to Physical and Mental Limitations

Western Carolina University commits to making reasonable accommodation to the known physical or mental limitations of qualified individuals with disabilities and qualified disabled veterans, unless such accommodation would impose an undue hardship on the conduct of its business. Western Carolina University also commits to engaging in an interactive process with the person requesting the accommodation (or their representative), as needed, to determine an appropriate accommodation. Undue hardship will be determined by assessing whether the requested accommodation would cause significant difficulty or expense as provided for in the Section 503 regulations.

SECTION II

ASSIGNMENT OF RESPONSIBILITY AND ACCOUNTABILITY

GOVERNOR

The Governor of the State of North Carolina has overriding responsibility for the State's equal employment opportunity policies and programs. The responsibility for the actual development and implementation of individual equal employment opportunity plans and programs is delegated by the Governor to each university chancellor and each head of a department of State and each head of a State agency or commission.

OFFICE OF STATE HUMAN RESOURCES RESPONSIBILITIES

The Office of State Human Resources shall develop and implement a State Equal Opportunity Employment plan for SHRA employees to promote equal opportunity throughout state government. The Plan shall include, but not be limited to, a policy statement and the following elements:

- Recruitment
- Disciplinary Process
- Selection Processes
- Hiring
- Promotion
- Training
- Compensation and Benefits
- Performance Appraisals
- Reduction in Force
- Harassment Prevention
- Evaluation Mechanism
- Reporting Mechanism
- Transfer and/or Separation
- Grievance Procedures

The Office of State Human Resources shall provide:

1. technical assistance, to include one-on-one or group consultation and an EEO Planning and Resources Guide to aid in the development and implementation of an effective plan and program.
2. training for: a) EEO Officers, EEO committee members and others responsible for the development and/or implementation of the EEO Plan and Program, b) agency heads, chancellors, managers and supervisors on diversity and EEO issues through the EEO Institute, and c) all employees on unlawful workplace harassment prevention, reasonable accommodations for the disabled, diversity issues, and other EO issues as appropriate.

3. monitoring to assess each agency's and university's progress.
4. oversight to ensure that the EEO plan and program in each agency and university complies with the minimum established measures in content and elements for an effective plan and program.
5. evaluation criteria to review, assess and report the status of each agencies and university's EEO plan, policies, procedures, practices and programs, in order to determine if they are administered in a consistent and fair manner. Evaluation will include an on-site component.
6. Support programs to enhance each agency's and university's efforts to attract, develop, promote, and retain a diverse workforce and to meet program objectives. The Office of State Human Resources shall develop data systems and design tools to Review data and analyze the degree of diversity within each occupational category. The information collected from the data systems, tools, and analysis will be used to evaluate trends related to all aspects of employment in order to determine the impact of all personnel policies and practices on EEO throughout State government and within each agency and University.

WESTERN CAROLINA UNIVERSITY RESPONSIBILITIES

The Chancellor of Western Carolina University has the ultimate responsibility for ensuring that EEO policy and programs are fully developed and successfully implemented. Each senior administrative officer of the University is then responsible to the Chancellor for carrying out those aspects of the Affirmative Action Plan that are relevant to the officer's area. The Chancellor has charged the Office of Human Resources and the Provost's Office with the responsibility for assuring implementation of the university Affirmative Action Plan. These offices monitor compliance with the program in order to assure consistency and progress toward the university's goals.

Equal Opportunity Programs

The Office of Human Resources in conjunction with the Provost's Office is charged with implementing and monitoring the daily operations of the university's Affirmative Action Plan. Responsibilities include but are not limited to the following:

- Develop policy statements and internal and external communication of those policies.
- Develop Affirmative Action Plan and the North Carolina EEO State Plan including goals and timetables for reduction of underutilization of protected group workers.
- Review hiring recommendations for compliance with EEO program objectives prior to the final university hiring decision.
- Maintain and analyze data on employment practices to: monitor and evaluate the effectiveness of the Affirmative Action Plan; identify area where

- further action is needed; and advise the Executive Staff of the program's impact and effectiveness on University workforce demographics.
- Provide and/or coordinate EEO training for management and other employees.
 - Provide confidential counseling or consultation for management and other employees in matters involving EEO concerns or complaints alleging discrimination (formally, informally, and within university guidelines).
 - Coordinate special programs (internally or with Office of State Human Resources) to achieve program objectives and to provide for management and employee input and assistance in program development and implementation.
 - Maintain all required records.

Associate Vice Chancellor for Human Resources

The Associate Vice Chancellor for Human Resources, in cooperation with the designated EEO Officer, is responsible for ensuring the following:

- The recruitment of new faculty and staff includes a wide pool of applicants so that all qualified women, minorities, qualified Veterans, disabled persons and members of other protected classes are afforded the opportunity to compete for each position opening.
- Accurate records are kept of all who apply for or are considered for any university employment.
- Notification of all equal employment opportunity laws and regulations is given to all employees.
- A personnel database is kept in a manner consistent with applicable employment practice laws and regulations, and with this Plan.
- The employee benefit program is presented to each new employee to fully explain the program and to assist each employee in the establishment and periodic updating of that person's benefit options.
- The grievance processes for EHRA and SHRA employees are mediated and monitored in a manner consistent with the Affirmative Action Plan and all applicable laws and regulations.
- University supervisors and employees are advised concerning personnel matters and University policies on employee relations in a manner which ensures equal treatment for all.
- All University job classifications are periodically reviewed to ensure that they conform with legal and regulatory requirements and with the provisions of the Affirmative Action Plan.
- Any training programs shall be offered and shall be equally accessible to all eligible employees regardless of sex, race, color, sexual identify or expression, sexual orientation, genetic information, age, religion, disabled status, veterans status, national origin or other relevant criteria.

Managers and Supervisors

Decisions that impact most directly on the success of the EEO program are made by persons at the managerial and/or supervisory level, therefore the roles of manager and supervisor are most crucial to the program. Each manager and supervisor is responsible for implementing the specific elements of the Affirmative Action Plan that are designed to eliminate barriers to equal employment opportunity which cause underutilization. The specific responsibilities of managers and supervisors include, but are not limited to:

- Assisting in the identification of problem areas, formulating solutions, and establishing departmental goals and objectives when necessary;
- 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;
- Reviewing 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;
- Maintaining a diverse workforce for the department, division, work unit, or section; and
- Providing a work environment and management practice that supports equal opportunity in all terms and conditions of employment.

Equal Employment Opportunity (EEO) Committee

EEO Committee responsibilities shall include, but are not limited to:

1. serving as a communication link between managers and employees and the EEO staff on aspects of the EEO plan and program.
2. reviewing and evaluating the equal employment opportunity plan and program.
3. reviewing workforce representation data in each occupational category.
4. surveying the organizational climate, employee attitudes, and evaluating the resultant data.
5. meeting with the agency head or university chancellor in conjunction with the EEO Officer to discuss EEO programs, report on the employees' concerns, and recommend changes or additions to the EEO policy, plan, or program.
6. identifying recruitment resources and other activities designed to strengthen the EEO program.
7. meeting as a committee at least biannually.

SECTION III DISSEMINATION OF EQUAL OPPORTUNITY POLICY AND PLAN

Western Carolina University is committed to equal opportunity and exhibits this by disseminating the policy and affirmative action plan. The Chancellor and Vice Chancellors continually emphasize that commitment at all levels of University employment. The following specific actions have been instituted to distribute the policy and will continue:

Internal Dissemination and Communication Procedures

1. The Equal Employment Opportunity Policy is included in the Western Carolina University Employment Policies for University Employees.
2. The Equal Employment Opportunity Policy and information on affirmative action is included in relevant employment handbooks as well as the Student Handbook.
3. Each new employee will be made aware of and provided access to the University EEO Policy.
4. The Equal Employment Opportunity Policy and information on affirmative action are explained and discussed with faculty/administrator search committees and supervisory personnel as they organize for the search process.
5. The Equal Employment Opportunity Policy is provided to all department/office heads as well as being posted in conspicuous places throughout the campus.
6. The WCU "Equal Opportunity Employer" statement is included on appropriate forms and publications.
7. A conscientious effort is made by the Department of Communications and Public Relations to publish articles covering promotions and achievements of women, minorities, individuals with disabilities, qualified veterans, and other employees in internal publications as well as local news media.
8. Summaries of the University EEO Report are provided to the Provost, Vice Chancellors, Deans, University Compliance Officer, and the Chief Diversity Officer.
9. Copies of the Affirmative Action Plan are placed on the University website and will be made available to anyone upon request to the University Affirmative Action Officer.

External Dissemination and Communication Procedures

1. All recruiting sources, including State employment agencies, educational institutions and social service agencies are informed of Western Carolina University's policy concerning the employment of qualified women and minorities, qualified individuals with disabilities and qualified veterans and have been advised to actively recruit and refer qualified persons for job opportunities.
2. All subcontractors, vendors and suppliers are sent written notification of Western Carolina University's Equal Employment Opportunity and Affirmative Action policies regarding the employment of qualified women and minorities, qualified individuals with disabilities and qualified protected veterans.
3. The equal employment opportunity clause concerning the employment of qualified women and minorities, qualified individuals with disabilities and qualified protected veterans are included in all non-exempt subcontracts and purchase orders.
4. A conscientious effort is made by Public Relations to publish articles covering promotions and achievements of women, minorities, and other employees in external media sources.

SECTION IV ELEMENTS OF THE AFFIRMATIVE ACTION PLAN

This Affirmative Action Plan (AAP) reflects the commitment of Western Carolina University to ensure equal opportunity in its establishment for all its applicants and employees and to identify and remove any barriers to equal opportunity and employment.

This AAP covers the 12-month period of October 1, 2015 to September 30, 2016.

AAP Elements

- A. Workforce Analysis
- B. Job Group Analysis
- C. Determination of Availability and Comparison of Incumbency to Availability
- D. Set Placement Goals

Workforce Analysis

The workforce analysis includes lists of the organizations entire staff showing each job title in the establishment by departments, ranked from lowest to highest rate range. For each job title, the number of employees, the range of compensation, and incumbent distribution among females and males of various racial groups are reported.

Job Group Analysis

In order to establish each job group, Western Carolina University has surveyed its workforce and placed various positions into groups having similar content, wage rates, and opportunities. The Job Group Analysis is a listing of all the job titles that make up each job grouping. The sex and race of each incumbent in the various jobs are also identified. See below for the listing of job titles that comprise each subgroup (41 CFR 60-2.12©).

Different salary grades and ranges have been combined within job groupings in order to make each grouping large enough to be statistically significant. This is in response to the regulations emphasis on grouping jobs with similar responsibility, similar pay or salary clusters, and similar opportunities for training, transfer, and advancement.

Job titles that comprise each Job Group:

100-Administrators
200-Faculty, Kimmel School
205-Faculty, Fine & Performing Arts
210-Faculty, Health & Human Sciences
220-Faculty, Arts & Sciences
230-Faculty, Business
240-Faculty, Education & Allied Professions
250-Library
300-Other Professionals
400-Technicians and Paraprofessionals
500-Office Support and Clerical
600-Skilled Craft Workers
720-Safety & Security
730-Other Auxiliary Services

Determination of Availability and Comparison of Incumbency to Availability

The purpose of the availability analysis is to determine the representation of minorities and women among those qualified (or readily capable of becoming qualified) for employment for each job group in the workforce. Availability is the yardstick against which the actual utilization of minorities or women in each job group is measured. The Two-Factor Analysis, as defined by the Office of Federal Contract Compliance Programs (OFCCP), is used to determine availability in the work force. This method involves the following steps:

- Determine availability of minorities and females in each job category by two established factors. The two factors are: (1) the number of qualified employees from the organization's internal labor force, and (2) the number of qualified persons from the population within the determined reasonable recruitment area;
- Determine underutilization by comparing actual workforce data to established availability in each job category;
- Determine projected hires based on the projected turnover percentage in each job category where underutilization exists;
- Formulate a set objectives for the initial reduction and the proposed elimination of the underutilization in each job category; and
- Develop procedures and programs to facilitate the likelihood of achievement of program objectives within the established time frames.

Underutilization of women or racial/ethnic minorities exists in a job group when the actual number of employees is less than the number that would reasonably be expected by their availability. The Office of Federal Contract Compliance Programs' definition of underutilization relies on a standard of reasonableness. Institutions may select among three recognized standards: the Any Difference

Test; an 80% test; and a standard deviations test. The University's goals have been set by applying the "Two Standard Deviation Rule." In using this measure for determining underutilization one effectively deals with the imprecision associated with personnel data and work force shifts. The "Two Standard Deviation Rule" is based on the observation that if the employer pays no attention at all to race or sex in placing people in jobs, there would be some natural degree of departure from perfect parity, both above and below, and that only extreme departures below parity should be construed as evidence of possibly discriminatory practices. If the difference between actual utilization and the availability percentages results in two points from the mean, then the difference may be significant and a goal should be set.

For analysis and evaluation, Western Carolina University's employee complement is divided into 14 job groups -- defined by similarity of opportunity, content, and salary or wage scale. Seven of the 14 job groups represent faculty employees, which are grouped according to disciplines that correspond to readily available labor market information from the Survey of Earned Doctorates. All other job groups are analyzed using national, state, or regional labor market information from the 2010 national census.

Workforce availability is adjusted for the number of qualified employees in each race and gender category that are considered promotable, transferable, and trainable within the organization to determine the overall recruitment area availability. The institution's workforce needs are addressed by identifying the groups that are underutilized (defined as having fewer employees in a demographic group in a particular occupational category than would reasonably be expected based on the appropriate census data).

SECTION V EQUAL EMPLOYMENT OPPORTUNITY PROGRAM ACTIVITY

PRIOR YEAR'S AAP AND PERFORMANCE

Summary of Prior Year's Affirmative Action Plan—Demonstration of Good-Faith Effort

Pursuant to 41 CFR 60, Western Carolina University undertakes an annual evaluation of the representation of women, racial/ethnic minorities, individuals with disabilities, and qualified veterans among its employees in relation to their representation. While fluctuations in representation within our employee complement occur naturally from year to year, the crux of equal employment opportunity/affirmative action planning is the comparison of the university's workforce to the corresponding labor market on a job group by job group basis. In the simplest of terms, the goal of the university's EEO/AA plan, over time, is for the university workforce to reflect the labor market. The focus of the Affirmative Action plan is to reflect any progress made in the past year as well as to identify where continuing improvement is needed to achieve parity with labor market availability.

As of October 1, 2015, the total number of employees at Western Carolina University increased by 16 from the previous year and 51 from Fall 2013. All recruited faculty and administrative positions were at minimum advertised with the Chronicle of Higher Education or HigherEdJobs.com, InsideHigherEd.com, the university web page, the State of North Carolina home page, and the North Carolina Division of Employment Security. All other externally posted positions were at minimum, advertised internally, on the University web page and with the North Carolina Division of Employment Security.

The overall number of faculty increased by nineteen for the 2014-2015 plan year from 512 to 519 with female faculty representation increasing by .9% and minority faculty decreasing by .5%. The University has taken several proactive steps to recruit for minority faculty and have made efforts in this area to increase minority representation. Examples of past efforts have included: notices were sent to historically minority colleges and universities for key recruited faculty positions and phone calls were made to department heads at universities with high minority enrollment in specifically targeted programs; The formation and active involvement of a campus-wide Council on Diversity and Inclusion. This council, which includes representation that is both internal and external to the university, serves in an advisory capacity and provides crucial insight to the University EEO Officer in the effort to eliminate any artificial barriers to employment opportunities for all qualified individuals that may exist in any University programs or policies. Irrespective of economic and/or geographical factors Western understands the importance of developing and promoting a diverse workforce and recognizing the challenges encountered with successfully recruiting and retaining minority faculty and staff to the university. As such, the university has charged the Council on Diversity and

Inclusion with identifying campus-wide diversity initiatives and formally developing and implementing an institutional diversity plan as it pertains to increasing minority workforce representation. Western Carolina University Diversity Plan may be accessed at:

<http://www.wcu.edu/about-wcu/leadership/office-of-the-chancellor/chancellors-division/equal-opportunity-and-diversity-programs/council-on-diversity-inclusion.asp>

A description of each job group follows with statistics describing the 2014-2015 plan year.

Job Group 100: Administrators

32.1% of the administrators are female and 9.4% are minority. It has been determined from census and workforce data that the overall availability for administrators is 40.7% female and 19.5% minority. While not statistically significant, results show that the percentages for minority employees in this job group are below national availability data.

Job Group 200: Faculty, Kimmel School

The Kimmel School includes the disciplines/departments of Construction Management and Engineering Technology. The faculty is 11.5% female (an increase of 6.9% from 2013) and 26.9% minority. The total number of faculty is 26. Full time tenure track faculty are externally recruited nationwide, as is typical of any college or university seeking faculty with Ph.D. degrees in specific disciplines. Compiled statistics from Summary Reports: Doctorate Recipients from U.S. Universities (1998-2008) indicate that availability for females in this job group is 14.9% and minority availability is 32.1%. Significant strides in minority and female representation have been made in this college.

Job Group 205: Faculty, Fine & Performing Arts

Fine & Performing Arts includes the disciplines/departments of the School of Art & Design, School of Music, and the Department of Stage & Screen. The faculty is 30.4% female (2.6% increase). The minority representation in the college is currently 0% (decrease of 1.9% from previous year). The total number of faculty in this college is 56 (+2 from the previous year). Full time tenure track faculty are externally recruited nationwide. Compiled statistics from Summary Reports: Doctorate Recipients from U.S. Universities (1998-2008) indicate that availability for females in this job group is 50.8% and minority availability is 15.2%. As both incumbent percentages are significantly below expected availability, it is imperative to continue to place strong emphasis on diversity recruitment for vacant faculty positions in this college.

Job Group 210: Faculty, College of Health & Human Sciences

The College of Health & Human Sciences includes the departments/disciplines of Communication Sciences & Disorders, the School of Nursing, the School of Health Sciences, Social Work, and Physical Therapy. The faculty is 78.8% female (+1.8% from 2014) and 4.7% minority (a decrease of 1.1%). The total number of faculty in this college is 85 (decrease of two from the previous year). Full time tenure track faculty are externally recruited nationwide. Compiled statistics from Summary Reports: Doctorate Recipients from U.S. Universities (1998-2008) indicate that availability for females in this job group is 71.2% and minority availability is 19.5%. As incumbent percentages for minority faculty are well below expected availability, it is imperative to continue to place strong emphasis on diversity recruitment for vacant faculty positions in this college.

Job Group 220: Faculty, College of Arts and Sciences

The College of Arts and Sciences includes the disciplines/departments of Anthropology and Sociology, Biology, Chemistry and Physics, Communication, Criminal Justice, English, Geosciences and Natural Resources Management, History, Mathematics and Computer Science, Modern Foreign Languages, Philosophy and Religion, and Political Science and Public Affairs. The faculty is currently 42.9% female (.8% increase) and 8.8% minority (an increase of 3.4% from Fall 2014). Open Faculty positions are recruited nationally, and nationwide statistics show that these disciplines have availability of 41.7% female and 20.3% minority. Female representation in this college remains in line with national data however representation of minority faculty in this job group remains below nationwide expected availability. A strong emphasis on the recruitment and retention of qualified minority faculty will continue to be a point of emphasis.

Job Group 230: Faculty, College of Business

The College of Business includes the schools/disciplines of Accounting, Finance, Information Systems, and Economics; Business Administration and Law and Sport Management; Economics, Management, and Project Management; and Marketing, Entrepreneurship, Sport Management, and Hospitality and Tourism. The faculty composition is 35.6% female (increase of 2.3%) and 11.9% minority (a decrease of .8%). Nationwide statistics show an external availability of 43% female and 22% minority.

Job Group 240: Faculty, College of Education and Allied Professions

The College of Education and Allied Professions(COEA) includes the departments of Educational Leadership and Foundations; Elementary and Middle Grades Education; Health, Physical Education & Recreation; Human Services; and Psychology. The faculty consists of 60.2% female and 8% minority (+2.3% from the previous year). Nationwide availability statistics show 69.8% female and 19.9%

minority. The COEA has implemented a college-wide Diversity Committee which has been charged with participating in all COEA faculty searches and strategically identifying ways to enhance overall diversity. Overall results of this initiative have been favorable. While the data shows that improvements are being made in this college, minority faculty representation remains below national averages and a need for continued efforts to recruit minority candidates still exists.

Job Group 250: Library

The composition of professional staff in the library includes 93.3 female (an increase of 6.6%) and 20% minorities (6.7% increase). The national availability for this job group is 64.8% female and 26.3% minority.

Job Group 300: Other Professionals

This job group includes professional staff (excluding faculty and administrators) such as auditors, accountants, university physicians, nurses, counselors, advisors, etc. This job group is composed of 60.3% female and 11.5% minority (an increase of 1.8%). These employees are also recruited nationally and external statistics based on 2010 census data show availability of 60.7% female and 23.8% minority. While minority representation has increased over the past two years (3.2% since 2013) continued efforts to attract and retain qualified minority professional staff remains a priority.

Job Group 400: Technicians and Paraprofessionals

This job group is composed of 31% female and 6.9% minority (an increase of 1.8% from 2014). Employees in this job group are primarily recruited from the local four county recruitment area (Jackson, Macon, Transylvania, Haywood) and external availability statistics based on 2010 census data show 41.1% female and 12.1% minority.

Job Group 500: Office Support and Clerical

The Office Support and Clerical job group is composed of 95% female and 6.3% minority (an increase of 2% from the previous plan year. Employees in this job group are primarily recruited from the local four county recruitment area (Jackson, Macon, Transylvania, Haywood) and external availability statistics based on 2010 census data show 81.9% female and 6.3% minority.

Job Group 600: Skilled Craft Workers

This job group, which includes positions such as electrician, mechanic, carpenter, plumber, etc., is composed of 3.9% female (an increase of 1.4% from two years ago) and 2.6% minorities (unchanged from 2014). Employees in this job group are primarily recruited from the local four county recruitment area (Jackson, Macon,

Transylvania, Haywood) and external availability statistics based on 2010 census data show 6.7% female and 4.8% minority. Given the low representation and availability of females and minorities within this job group, the ability to attract and retain qualified women and minority candidates for these positions remains a priority.

Job Group 720: Safety and Security

The Safety and Security job group which includes the University Police force is made up of 14.8% female and 14.8% minority (5.7% increase). These positions are traditionally recruited from the local four county region and external availability statistics based on 2010 census data show 26.8% female and 12.6% minority.

Job Group 730: Other Auxiliary Services

This job group which includes positions such as food service workers, grounds workers, general utility workers, housekeepers, etc. is composed of 43% female and 3.5% minority (+1.4% from the previous year). Employees in this job group are recruited from the local four county recruitment area and 2010 census data shows an external availability of 43% female and 10.1% minority. As positions in this job group become vacant, a continued strong emphasis needs to be placed on recruiting qualified minorities into this job group.

Recruitment

The Office of Human Resources (OHR) at Western Carolina University has centralized administrative responsibility for all University employment processes to include recruitment. Through established procedures that are consistent with the University's equal employment opportunity policy statement OHR will work to achieve a diverse workforce that successfully meets the needs and demands of the University.

To ensure compliance with State and Federal laws, OHR approves the placement of advertisements and the screening of applications. Media sources include newspapers, occupation specific publications, professional journals, professional association newsletters, and Internet sites. Recruitment for staff and faculty positions includes, but is not limited to, the following activities: posting with the North Carolina Division of Employment Security; posting on the university jobs website (<http://jobs.wcu.edu>); placement with career websites such as HigherEdJobs.com and InsideHigherEd.com; weekly postings with minority publications such as the Cherokee One Feather; contacts with minority and women's colleges and universities; technical school recruitment visits; and developing relationships with various community organizations and agencies.

To begin the recruitment process, departments create and submit an online vacancy notice to the Office of Human Resources to recruit for a vacancy. Upon receiving the notice, the designated Recruitment Coordinator posts the vacancy and assists the hiring department in the recruitment, screening, and referring of

applications for the position. SHRA staff vacancies must remain open a minimum of seven workdays after being posted. Tenured track faculty and EHRA non-faculty positions should remain open a minimum of 30 calendar days. The Recruitment Coordinator consults with the Hiring Department to develop an appropriate recruitment plan (to include any special diversity recruitment efforts).

Individuals interested in permanent University employment must complete an online application for employment and all applications must be initially evaluated by the Office of Human Resources or approved search committee. Applicants are considered for only those specific vacancies for which they apply. For SHRA positions, the Recruitment Coordinator evaluates each applicant's education, experience, skills, and competencies in relation to valid job requirements and as indicated in the University's Merit Based Recruitment and Selection Plan. Additionally, the Recruitment Coordinator identifies any special priority considerations, such as promotional priority, re-employment (layoff) priority, veteran's preference or return from workers compensation and works with the hiring to department to ensure proper priority is awarded. For EHRA Faculty and Non-Faculty positions, the Recruitment Coordinator works with the designated search committee to ensure all application materials are given proper consideration, all appropriate preferences are afforded, and all search procedures are followed.

Disciplinary Process

Western Carolina University administers a progressive disciplinary process for SHRA employees by which discipline is administered only for just cause and apportioned to the degree of severity and frequency of unacceptable employee performance or conduct. All disciplinary actions are to be administered consistently and equitably without regard to race, color, sex, gender identity or expression, sexual orientation, genetic information, religion, age, political affiliation, national origin, or disability. All disciplinary actions are subject to the approval of the Office of Human Resources to ensure all aspects of the disciplinary process have been followed. This policy provides employees and management with a process for correcting and improving performance problems and handling instances of unacceptable personal conduct or grossly inefficient job performance. Any employee of the University may be warned, demoted, suspended or dismissed for just cause. However, SHRA employees must receive successive discipline as prescribed in this policy. Unsatisfactory job performance, grossly inefficient job performance or unacceptable personal conduct constitutes just cause for discipline or dismissal. When just cause exists, the only disciplinary actions provided under this policy are: written warning; disciplinary suspension without pay; demotion; or dismissal. Additional information on the university SHRA Disciplinary process is available at:

<http://www.wcu.edu/discover/leadership/office-of-the-chancellor/legal-counsel-office/university-policies/numerical-index/university-policy-78.asp>

Selection

The goal of the selection process is to find the best available candidate for the recruited position. This candidate will possess the skills, knowledge, abilities, and competencies necessary to successfully fill the position. The hiring department is responsible for determining which applicants will be interviewed. Only those candidates that meet the minimum advertised qualification requirements may be considered for an interview. The department maintains summaries of all interviews. Interview guidelines and effective interview training is provided by the designated Recruitment Coordinator and the Office of Human Resources to facilitate proper interviewing procedures. When the interview process has been completed and a candidate selected, the department submits an online Hiring Proposal to the Office of Human Resources where the request is evaluated to ensure all university equal opportunity commitments have been met and all university, state, and federal policies, procedures, and regulations have been satisfied.

Job Structuring

Western Carolina University is committed to maintaining campus-wide alignment in the classification of its positions. Currently, all SHRA positions at the university are categorized within the statewide Career Banding classification and pay system. This Classification system provides a structured approach using consistent criteria for analyzing and classifying the duties and responsibilities of SHRA positions. The Office of State Human Resources (OSHR) establishes and maintains the Career Banding classification and pay system for all SHRA positions and exercises overall administrative authority of the system. Administration of the Career Banding classification and pay system at Western Carolina University is the responsibility of the Office of Human Resources. Criteria for the establishment, structuring, and alignment of EHRA Faculty and Non-Faculty positions are determined based upon a variety of factors to include the relation to the overall mission of the institution, the needs of the department, and the availability of resources. Salaries for these positions are guided by comparison national CUPA data (all public institutions) and UNC system Peer Group salary ranges.

Current University policy requires that supervisors prepare and submit to Human Resources online job descriptions for each new position and/or to document changes in job duties for any existing position(s). Human Resources reviews the job description and interviews department representatives, employees, and supervisors as appropriate for any additional clarification of responsibilities. Human Resources classifies the position by assigning it to the appropriate occupational category, classification/career band and corresponding salary range based on the duties, responsibilities, and competencies being performed in the position. Human Resources, under a Delegated Authority Agreement with OSHR, administers all SHRA classification and career banding decisions and actions.

Promotion/Upward Mobility

WCU, in maintaining its commitment to diversity and affirmative processes through the open recruitment of vacancies, does strongly advocate the upward mobility of staff through training and professional development programs that fully prepare the existing workforce for both current and future needs. Upward mobility includes upward movement in the same position through position reclassification, increased career banding competency level, or by transfer to another position within a higher career band or salary range within the university.

Employee Training

Western Carolina University is committed to providing opportunities to enhance skills, expand levels of knowledge, improve job performance, encourage personal development/improvement, and explore career paths. Supervisors are expected to encourage employees to take advantage of training and educational opportunities that will enhance their knowledge, skills, and abilities and will contribute to the overall health of the institution. Western Carolina University's training programs are designed to: assist departments in retaining and motivating employees; provide employees with skills to meet the continuously changing technological demands; enhance professional development and further employee career goals; and provide management with the knowledge, principles, and skills to ensure effective, safe and productive work environments for their employees and departments. All educational and training programs sponsored by the University are well publicized and open to eligible employees.

Management Training

Critical to the University's equal opportunity efforts and success are its management compliance training programs. Periodic special management training designed to cover all facets of the University's Equal Opportunity Policy and to define individual responsibility for the effective implementation of the University Equal Employment Opportunity plan is conducted. Additionally, ongoing day-to-day training occurs between managers and the Office of Human Resources. The centralized training administered by the Office of Human Resources is specific and comprehensive for managers/supervisors and is offered on a regular, recurring basis as follows: the definition of equal employment opportunity; the legal bases for equal opportunity; interpreting and applying equal opportunity policies and guidelines; unlawful workplace harassment policies, including the established procedures for reporting, investigating and resolving such matters; preventing work place harassment; the guidelines for valid and legal selection procedures; and identifying and eliminating barriers which can lead to discrimination.

Compensation and Benefits

University positions with similar duties and responsibilities are assigned to the same job category, classification or career band and corresponding salary range. Employees' salaries are based on the applicant's relevant training and experience, competencies, labor-market considerations, internal salary equity needs, and the availability of funds. Benefits that include leave policies; retirement plans; insurance programs; and other terms, conditions and privileges of employment; are equally available without discrimination to all employees.

Performance Appraisal

Western Carolina University is committed to administering a Performance Management Program that is consistent with GS 143A-17, GS 143 B-10 (h) and State Human Resources Commission policy. This program begins with strategic planning that establishes long-term goals and short-range objectives that may then be used at the work unit level to develop individual work plans for employees in each unit. Individual work plans clarify how an employee's job duties relate to the goals of the work unit, department and university.

Western Carolina University's Performance Management Program is applicable to all EHRA Non-Faculty employees and all SHRA employees who hold a probationary, time-limited, trainee or permanent appointment and involves supervisors and employees in a four-step process: determining performance expectations, establishing a development/improvement plan if appropriate, reviewing expectations and performance at the mid-point of the cycle, and conducting an annual performance appraisal. The program promotes communication between employees and supervisors and involves employees in setting performance expectations. Components of the program include a work plan for each employee, a rating scale containing five performance levels, an annual performance review, an employee development/improvement plan, training for supervisors and employees and a procedure for resolution of disputes arising from appraisal or salary increase decisions.

The Performance Management Program also serves to provide information pertinent to various personnel decisions such as promotion, demotion, merit increases, reduction-in-force, and disciplinary actions.

Program compliance for SHRA employees is monitored by the State Human Resources Commission through the Office of State Human Resources and by the University's Office of Human Resources. Program compliance for EHRA employees is monitored at the University level by the Office of Human Resources. Overall responsibility for effective program administration rests with the University. Supervisors are responsible for evaluating employees under their supervision and, in turn, are evaluated by their supervisors on how well they perform this duty.

The goals of Western Carolina University's Performance Management Program are to:

- Insure that employees know what is expected of them regarding their work performance;
- Provide employees with regular feedback regarding their job performance;
- Encourage communication between supervisors and employees;
- Provide an equitable basis for appraising employee job performance;
- Provide a sound basis for making personnel decisions;
- Provide developmental opportunities

For EHRA Faculty, an Annual Faculty Evaluation is conducted http://www.wcu.edu/webfiles/pdfs/provost_4.05_annual_faculty_evaluations.pdf

to evaluate and provide feedback on overall performance.

Transfer and/or Separation

Western Carolina University has in place a structured and uniform procedure for employees transferring and/or separating from employment. University procedures require that notification of separation be submitted to the Office of Human Resources as soon as notification of an employee's intended separation is received. If the separation is due to a resignation or transfer, the employee's letter of intent must accompany the notification. The Office of Human Resources conducts an Employee Exit Interview process for employees leaving university employment. The purpose of this program is to ensure that all internal separation processes have been completed and to serve as a feedback mechanism to enhance overall employment practices and processes.

Grievance Procedures

It is Western Carolina University's policy to provide a means of communication between supervisors and employees and establish principles of administration to insure a prompt, orderly and fair response to either an SHRA or EHRA employee's grievance. The objectives of each of these policies are intended to assure that employees can get their complaints considered rapidly, fairly and without fear of reprisal; take steps to ensure costs to process grievances are contained; and, resolve workplace issues efficiently and cost effectively. Additional information on the University Grievance policy and procedures is available at: SHRA: <http://www.wcu.edu/discover/leadership/office-of-the-chancellor/legal-counsel-office/university-policies/numerical-index/university-policy-77.asp>

EHRA: <http://www.wcu.edu/discover/leadership/office-of-the-chancellor/legal-counsel-office/university-policies/numerical-index/university-policy-112.asp>

Equal Employment Opportunity Institute (EEOI)

In accordance with General Statutes (126.16.1), Western Carolina University participates in the North Carolina Office of State Human Resources sponsored Equal Employment Opportunity Institute (EEOI) for managers and supervisors. The EEOI program is offered on the Western Carolina University campus twice per academic year and is provided to newly hired managers and supervisors and any managers and supervisors who have not previously completed the training. A total of 27 WCU managers and supervisors completed EEOI training during the previous plan year.

Internal Monitoring, Evaluation, & Reporting Procedures

The Office of Human Resources maintains primary responsibility for monitoring, analyzing and evaluating the University's equal opportunity progress. All areas of the employment process are monitored and regular reports and updates are provided to ensure compliance with and a commitment to equal employment opportunity. Regular reports are generated regarding the number of applicants, hires, promotions, transfers, and separations in each job group. Analyses are performed to determine whether women or minorities have been adversely impacted in any of these areas and if warranted, appropriate corrective action is determined.

VI. REDUCTION IN FORCE OF EMPLOYEES SUBJECT TO THE STATE HUMAN RESOURCES ACT

The Reduction-In-Force (“RIF”) policy (“RIF Policy”) assures equitable treatment of SHRA employees when a RIF becomes necessary. A RIF might become necessary because of a reduction in work or funds, abolishment of a position, or other material change in duties or organization. A RIF decision should be reached only after other applicable measures have been explored, including but not limited to such actions as: delaying the filling of or elimination of vacant positions; limits on purchasing and travel; retraining of employees in needed skill sets; or job sharing and work schedule alternatives.

DEFINITIONS

“**Work Unit**” is a formally established and recognized unit, section, college, division, or department of Western Carolina University (the “University”) in which employees perform a closely related set of functions or duties. A Work Unit manager may define individual research projects headed by a Principal Investigator (“PI”) as a separate work unit for the purposes of this RIF Policy. Any such assertion is subject to appropriate justification that demonstrates the unique nature of the research project and the skills of its assigned staff members as contrasted with other research projects supervised by either the same or differing PIs within the same college or department.

COVERED EMPLOYEES

This RIF Policy applies to:

- SHRA employees (full-time and part-time) holding permanent appointments; and
- SHRA employees with trainee appointments who have completed six (6) months of service (or who attained permanent status prior to entering a trainee appointment).

The following types of SHRA employees may be separated without following the procedures found within this RIF Policy:

- SHRA temporary employees;
- SHRA employees within their probationary periods;
- SHRA employees with time-limited permanent appointments; and
- SHRA employees with trainee appointments who have not completed six months of service and had not attained permanent status prior to entering a trainee appointment.

Although this RIF Policy does not apply to EHRA and student appointments, Work Unit managers should consider all staffing resources when determining positions to retain.

PROCEDURES

A RIF decision requires a thorough evaluation of the need for specific positions and the relative efficiency of affected employees so that the University can provide the highest level of service possible with a smaller work force. The decision to separate an employee or group of employees pursuant to this RIF Policy rests with the manager overseeing the affected Work Unit(s).

The Work Unit manager determines which employees shall be separated by applying the following factors in order:

1. **University needs.** Consider the continuing work to be performed by the Work Unit(s) and the number of positions in each branch, role, and competency level necessary to perform the continuing work. Once the position(s) to eliminate have been identified, management must consider all employees in positions with the same or related classification within the affected Work Unit. "Same or related" classification means positions in the identified branch, role and competency level in order to identify the affected employees and apply the remaining guidelines.
2. **Type of appointment.** SHRA time-limited, temporary, probationary or trainee employees (during their first twenty four (24) months of training) who perform work in the same or related SHRA job classification within the affected Work Unit must be separated before any employee with a permanent appointment.
3. **Relative skills, knowledge, and productivity of employees.** Employees to be retained must demonstrate the skills and knowledge required for the continuing work of the Work Unit or be able to attain the requisite skills and knowledge within a reasonable period of time in accordance with the operational needs of the Work Unit. Selection must be consistent with the employee's most recent annual performance review and employee competency assessment as well as other relevant documentation.
4. **Length of total state service of employees.** Length of service shall be considered but may receive less weight in the determination. Eligible veterans must be accorded one (1) year of state service for each year (or fraction thereof) of military service, up to a maximum of five (5) years of credit.
5. **Workforce diversity.** In accordance with federal guidelines affecting equal employment opportunity, any application of the RIF Policy must be

reviewed by the affected Work Unit(s) and Human Resources to determine its impact on the workforce diversity within the Work Unit(s).

The Work Unit manager is accountable for documenting the basis for his/her decision in a manner that clearly demonstrates reasonable and consistent application of these factors. The Office of Human Resources will provide consultation to Work Unit managers regarding the effective application and interpretation of state policies and guidelines.

REVIEW AND APPROVAL

The Work Unit manager submits a SHRA RIF Request Form (available in Section XII below) to their executive manager (the Provost, Vice Chancellor for Administration and Finance, Vice Chancellor for Student Affairs, Chief of Staff, Chief Information Officer or Athletic Director, each of whom is referred to as the “Executive Manager”) ultimately responsible for the Work Unit. The Executive Manager then submits a copy of the SHRA RIF Request Form to the Office of Human Resources. The SHRA RIF Request Form must indicate:

- the reason(s) for the RIF;
- the anticipated date of separation;
- name(s) of the employee(s) to be separated due to the RIF and justification for the decision;
- a listing of all vacant positions in the Work Unit which are in the same branch/role and competency level with a status of recruitment activity for those positions;
- what efforts the Work Unit manager made to avoid the RIF of selected employee(s);
- a brief explanation why action other than RIF is not possible;
- a management contact; and
- any other information that the Executive Manager believes to be relevant to the RIF.

The Office of Human Resources must provide the Work Unit with written approval of the RIF request before any RIF action can be taken.

SHRA permanent employees must receive written notice of RIF at least thirty (30) calendar days prior to their effective separation date. Therefore, the Work Unit manager is expected to submit the SHRA RIF Request Form to the Office of Human Resources at least six (6) weeks prior to the anticipated separation date of any employee to be separated due to the RIF, in order to provide adequate time both for review and the required notification to the employee(s).

BENEFITS PROVIDED TO AFFECTED EMPLOYEES

SHRA permanent employees are entitled to:

- One (1) year of employer contributions to the employee's (self-only) health insurance, if eligibility requirements are met; and
- Payout of vacation and bonus leave and other applicable paid time-off, upon the date of separation.

In addition, SHRA permanent employees may be eligible for RIF benefits, including:

1. Up to four (4) months of severance pay based on total state service supplemented by an age adjustment factor (employees qualify for the age adjustment factor at 40 years of age); and
2. Priority re-employment consideration pursuant to law and policy.

Work Unit managers should consider the total budgetary cost of separating an employee through RIF when determining an appropriate separation date for affected employee(s). If the employee is eligible to receive severance pay, severance payments will be direct-deposited.

NOTIFYING AFFECTED EMPLOYEES

After the SHRA RIF Request Form has been approved by the Office of Human Resources and before the effective date of the RIF, the Work Unit manager provides the following information, in writing, to the employee(s) being separated due to the RIF:

- The reason for the RIF;
- The effective date of the RIF (must be at least thirty (30) calendar days after the notification date to the employee); and
- Notification that the Office of Human Resources will contact them to arrange for a RIF information session, including details on:
 - The University's policy on priority re-employment;
 - Completion of necessary application forms;
 - The availability of aid in seeking other employment;
 - Eligibility to apply for unemployment insurance benefits;
 - Other benefits information for separating employees;
 - The amount of severance pay being requested, if any; and
 - The right of SHRA permanent employees to appeal the RIF through the University's SHRA Grievance Policy.

REDUCTION OF HOURS (FTE) FOR POSITIONS

To avoid a RIF, a Work Unit manager may consider reducing the regularly scheduled hours for position(s). If so, employees must be given the option of RIF in lieu of reduction in hours. In these situations, any reduction in hours for positions must be included in the Work Unit's SHRA RIF Request Form. This RIF Policy does not apply to routine changes in hours related to contracts and grants management or to an employee request for a voluntary permanent or temporary reduction in hours.

ABOLISHMENT OF POSITION

Once the SHRA RIF Request Form has been approved by the Office of Human Resources, and once any employees have separated or been reassigned, the Work Unit manager must complete the RIF process by abolishing the approved positions pursuant to the SHRA RIF Request Form.

APPEALS

An SHRA permanent employee who has received official notification of RIF may appeal the decision through the procedures established in the University's SHRA Grievance Policy if he/she alleges the following:

- That the action taken is the result of a specific violation of this RIF Policy evaluation criteria; and/or
- That the action is due to prohibited discrimination based on a protected status of the employee; and/or
- That the action is retaliatory because the employee has alleged prohibited harassment or discrimination, has alleged improper government activities (whistleblower protection), or has participated in the grievance process.

An employee cannot grieve management's business decision to take RIF action on the grounds that the action is undesirable or inadvisable.

If an employee who has been separated because of a RIF is not satisfied with the University's final decision on the appeal, the employee may file an appeal with the North Carolina Office of Administrative Hearings in the following situations:

- The employee is alleging that the RIF separation was the direct result of retaliation for the employee's opposition to alleged discrimination based on the employee's age, sex, race, color, national origin, religion, political affiliation, or handicapping condition; or
- The employee alleges that the separation by RIF is the result of improper application of the veteran's preference policy.

The employee also may forgo utilizing the University's grievance process and appeal directly to the Office of Administrative Hearings if the employee alleges that the RIF action was the direct result of retaliation for the employee's opposition to alleged discrimination as noted above.

POLICY REVIEW

This RIF Policy shall be reviewed and revised as necessary in the event that the North Carolina Office of State Human Resources revises its reduction-in-force policies.

VII. WESTERN CAROLINA UNIVERSITY UNLAWFUL WORKPLACE HARASSMENT POLICY

EMPLOYEES WHO HAVE COMPLAINTS OF SEXUAL HARASSMENT, OTHER UNLAWFUL HARASSMENT OR DISCRIMINATION SHOULD CALL THE TITLE IX COORDINATOR AT 828-227-7116.

STUDENTS WHO HAVE COMPLAINTS OF SEXUAL MISCONDUCT, SEXUAL HARASSMENT, OTHER UNLAWFUL HARASSMENT OR DISCRIMINATION AGAINST EMPLOYEES OR AGENTS SHOULD CALL THE TITLE IX COORDINATOR AT 828-227-7116.

STUDENTS WHO HAVE COMPLAINTS OF SEXUAL MISCONDUCT, SEXUAL HARASSMENT, OTHER UNLAWFUL HARASSMENT OR DISCRIMINATION AGAINST OTHER STUDENTS SHOULD CALL THE DEPARTMENT OF STUDENT COMMUNITY ETHICS AT 828-227-7234.

ANYONE WHO HAS COMPLAINTS OF CRIMINAL ACTIVITY SHOULD CALL THE UNIVERSITY POLICE DEPARTMENT AT 828-227-8911 FOR EMERGENCIES OR 828-227-7301 FOR NON-EMERGENCIES.

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I. POLICY STATEMENT ON UNLAWFUL HARASSMENT

Western Carolina University (the “**University**”) is committed to equal opportunity in educational programs and employment for all persons regardless of race, color, national origin, religion, gender, age, gender identity or expression, genetic information, sexual orientation, military veteran status, disability or political affiliation.

The University supports programs, curricula and extra-curricular activities that encourage inclusion and appreciation for all members of its community, and will not tolerate any unlawful harassment, as defined below, based on the above classes or characteristics to the extent that an employee’s work performance is affected as described below, or a student is effectively denied equal access to the University’s resources and opportunities.

II. POLICY STATEMENT ON SEXUAL HARASSMENT AND SEXUAL MISCONDUCT

Sexual harassment, including sexual misconduct and sexual assault, constitutes unlawful discrimination based on gender and threatens the University’s culture of civility and mutual respect. It is the policy of the University that its employees and students should be free from sexual harassment by any University employee, student, visitor to the campus, or any agent or contractor having a business, professional, or educational relationship with the University, and sexual harassment as defined in this Policy will not be tolerated.

The University reaffirms its commitment to academic freedom in accordance with the policies of The University of North Carolina (“**UNC**”), but recognizes that academic freedom does not allow sexual harassment. The discussion of sexual ideas, taboos, behavior or language which is an intrinsic part of course content shall in no event constitute sexual harassment. It is recognized that an essential function of education is a probing of opinions and an exploration of ideas that may cause some students discomfort. It is further recognized that academic freedom ensures the faculty’s right to teach and the student’s right to learn.

III. SCOPE AND APPLICATION OF POLICY

This policy applies to: (1) all applicants for employment; (2) all applicants for admission to the University; (3) University officers, faculty, staff, and students; and (4) persons who serve the University as agents during a specified period of agency (e.g., volunteers).

With regard to SHRA (formerly SPA) employees, this policy is intended to supplant former University Policy #70 and applies to former employees as well as full-time or part-time SHRA employees with permanent, probationary, trainee, time-limited/permanent or temporary appointments.

IV. DEFINITIONS

“sexual harassment” is a type of discrimination based on gender. In the employment context, sexual harassment includes, but is not limited to, unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature which may arise in one of the three following circumstances:

1. submission to the sexual request or conduct is made either explicitly or implicitly a term or condition of employment (quid pro quo harassment);
2. submission to or rejection of the sexual request or conduct is used as the basis for an employment decision affecting the individual (quid pro quo harassment);
3. the sexual request or conduct has the purpose or effect of unreasonably interfering with an employee’s work performance or education or creating an intimidating, hostile, or offensive environment (hostile environment harassment).

(adopted from the Equal Employment Opportunity Commission (“EEOC”) Guidelines)

With regard to students, sexual harassment is defined by the Office of Civil Rights (“OCR”) as unwelcome sexually harassing conduct that is sufficiently serious that it affects a student’s ability to participate in or benefit from an education program or activity, or creates an intimidating, threatening or abusive educational environment (hostile environment harassment). Additionally, quid pro quo harassment occurs when a University employee causes a student to believe that he or she must submit to unwelcome sexual conduct in order to participate in a University program or activity. Sexual harassment of students is a form of sex discrimination prohibited by Title IX.

Actions deemed to violate this policy include, without limitation, the following examples:

1. For employees or students to propose to other employees or students that they engage in or tolerate activities of a sexual nature in order to avoid some punishment or receive some reward;
or

2. To create a hostile environment as defined below; or
3. To continue verbal or physical conduct of a sexual nature when an employee or student has indicated, by word or action that such conduct is unwanted.

“harassment” is unwelcome conduct based upon race, color, national origin, religion, gender, age, gender identity or expression, genetic information, sexual orientation, military veteran status, disability or political affiliation.

“unlawful harassment” harassment becomes unlawful where - (1) enduring the offensive conduct becomes a condition of continued employment, or (2) is severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive. Petty slights, annoyances, and isolated incidents (unless extremely serious) will not rise to the level of illegality. To be unlawful, the conduct must create a work environment that would be intimidating, hostile, or offensive to reasonable people.

“hostile environment” is one that a reasonable person (objective standard) would find hostile or abusive and one that a complainant under this policy perceives to be hostile or abusive (subjective standard). Hostile environment is determined by looking at all of the circumstances, including the frequency of the allegedly harassing conduct, its severity, whether it is physically threatening or humiliating, the extent to which the conduct was intended to harm, harass or exploit the complainant, and whether the conduct actually and substantially interferes with an employee’s work performance or a student’s ability to participate in or to receive benefits, services, or opportunities in the University’s education programs and activities.

“quid pro quo” sexual harassment consists of unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct when - (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual’s employment or student’s academic success, or (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions or academic decisions affecting such individual.

“retaliation” is adverse treatment which occurs because of opposition to unlawful harassment or sexual harassment.

“sexual misconduct” as defined in the Western Carolina University Code of Student Conduct (**“Student Code”**) is sexual violence that includes sexual assault, nonconsensual sexual contact, sexual exploitation, and sexual harassment.

“sexual assault” is defined in the Student Code as engaging in vaginal, oral, or anal penetration or intercourse without a person’s consent.

“non-consensual sexual contact” is defined in the Student Code as engaging in any other physical contact (direct or indirect) not described in the definition of sexual assault which is performed without a person’s consent. Examples include, but are not limited to, the intentional touching of an unwilling person’s

genitalia, groin, breast, buttocks, or clothing covering them, or forcing an unwilling person to touch another's intimate parts as listed above.

“**sexual exploitation**” is defined in the Student Code as taking non-consensual, unjust, or abusive sexual advantage of another for one's own advantage or benefit; or to benefit or advantage anyone other than the one being exploited; and that behavior does not otherwise constitute sexual assault or sexual harassment. Examples of sexual exploitation include, but are not limited to: prostituting another student, nonconsensual video or audio taping of sexual activity, going beyond the boundaries of consent (such as letting friends surreptitiously watch you having consensual sex, or unauthorized distribution of photos or other materials of a sexual nature), engaging in voyeurism, and inducing incapacitation with the intent to rape or sexually assault another person or with the intent to create opportunity for a third party to rape or sexually assault another person.

V. TITLE IX COORDINATOR

In accordance with federal law, the University shall designate a Title IX Coordinator who shall have the following responsibilities:

1. Ultimate oversight of the University's Title IX compliance efforts;
2. Being available to meet with students regarding sexual harassment or sexual assault allegations ;
3. Ensuring that complaints are handled through appropriate procedures;
4. Assisting University Police as appropriate in cases of reported sexual violence;
5. Investigating or overseeing the investigation of complaints of sexual harassment or sexual assault;
6. Developing and maintaining a system for tracking and reviewing complaints of sexual harassment and sexual assault;
7. Monitoring and evaluating Title IX compliance in the areas of athletic participation, treatment in athletic programs, and athletic financial assistance;
8. Assisting the Chief Diversity Officer in the administration of periodic campus climate surveys;
9. Assisting in the development or procurement of educational materials addressing sexual harassment, sexual assault, unlawful harassment, and other forms of discriminatory personal conduct; and
10. Assisting in the development and delivery of training on these subjects, including sexual assault prevention.

The University shall designate deputy Title IX Coordinators, including at a minimum the Associate Vice Chancellor for Student Affairs/Dean of Students, the Assistant Vice Chancellor for Student Affairs, the Director of the Department of Student Community Ethics (“**DSCE**”), and one person in the Division of Academic Affairs appointed by the Provost. The deputy Title IX Coordinators shall assist the Title IX Coordinator in the discharge of his/her responsibilities.

VI. SEXUAL VIOLENCE PREVENTION COMMITTEE

The University hereby establishes a standing Sexual Violence Prevention Committee (the “**SVPC**”). The SVPC shall be comprised of the following members:

1. Title IX Coordinator, who shall serve as chair;
2. Deputy Title IX Coordinators not otherwise listed;
3. Chief Compliance Officer
4. Clery Act Coordinator;
5. Chief Diversity Officer;
6. Associate Vice Chancellor for Student Affairs/Dean of Students;
7. Director of Employee Relations;
8. Chief of University Police;
9. University Police Victim Services Sergeant;
10. Director of the DSCE;
11. Vice Chancellor for Student Affairs;
12. Representative from the Department of Athletics appointed by the Athletic Director;
13. Representative from the Department of Intercultural Affairs appointed by the Vice Chancellor for Student Affairs;
14. General Counsel;
15. A student member appointed by the President of the SGA;
16. Director of Counseling and Psychological Services; and
17. A faculty member appointed by the Provost.

The SVPC shall establish such sub-committees as may be necessary to accomplish its objectives and responsibilities. Membership of such sub-committees may include, at a minimum, faculty representatives appointed by the Provost and student representatives appointed by the Vice Chancellor for Student Affairs or his/her designee.

The SVPC shall have the following responsibilities:

1. Serve as an advisory body to the Chancellor on matters pertaining to sexual violence, sexual harassment, and related campus safety;
2. Assist in the development of and recommend policies and implementing procedures regarding sexual violence and related campus community safety, compliance with applicable state and federal laws and regulations, including Title IX, Clery Act, and the Violence Against Women Reauthorization Act of 2013, and compliance with University of North Carolina policies and directives;
3. Assist in the development and delivery of training and professional development for employees;
4. Assist in the development and delivery of information and programming for students, particularly in the areas of awareness and primary prevention, safe and effective intervention strategies, factors that contribute to sexual violence such as alcohol and drugs, and diversity and inclusion;

5. Assist the Division of Student Affairs in maintaining the University website on sexual assault awareness;
6. Assist with the University's community outreach efforts; and
7. Coordinate with faculty, the Title IX Coordinator, and the University's Institutional Review Board to develop and conduct climate and other related surveys/research.

VII. COMPLAINTS FROM EMPLOYEES, AGENTS, AND GENERAL PUBLIC

A. Informal Resolution of Sexual Harassment and Unlawful Harassment Complaints

For complaints concerning potential sexual harassment or other unlawful harassment, any employee may elect to discuss the problem directly with the person whose behavior is questioned before seeking formal assistance, which is recommended in most circumstances. Confronting the offending party in a conversation or in writing to request that he/she stop engaging in the offensive behavior may resolve the situation. Candid discussion between the parties involved about how a behavior made someone feel can be an empowering experience that overcomes the negative feelings associated with the offending conduct.

However, some situations may be so serious that informal resolution may not be appropriate and direct progression to the formal initiation of a complaint may be necessary. If a complaint is directed against a supervisor or administrator who would otherwise play a role in responding to and attempting to resolve the complaint, the employee should not discuss his/her complaint with that supervisor but may discuss the complaint with the next supervisor in a direct line of authority.

B. Formal Resolution of Sexual Harassment and Unlawful Harassment Complaints

1. Complaints from EHRA (formerly EHRA) Faculty and Non-Faculty against Other Employees or Agents

(a) Initiating Section VII.B.1 Complaints

Complaints should be reported, preferably in writing, to the Title IX Coordinator at 520 HFR Administration Building, Cullowhee, NC, 28723. The Title IX Coordinator may be reached by telephone at (828) 227-7116. Complaints should be made within fifteen (15) calendar days of the alleged harassing action (the conduct giving rise to the complaint) to ensure a prompt and complete investigation; however, the University reserves the right to initiate investigations and take action at any time depending on the nature of the alleged harassing conduct.

(b) Investigation of Section VII.B.1 Complaints

The Title IX Coordinator shall investigate thoroughly and impartially all complaints within forty-five (45) calendar days from the receipt of complaints. The Title IX Coordinator may seek the assistance of other University officials, including the deputy Title IX Coordinators, in situations where there may be actual or perceived conflicts of interest or as otherwise may be necessary to ensure timely, impartial, and complete investigations

(c) Written Reports /Resolution of Section VII.B.1 Complaints

Upon completion of his/her investigation, the Title IX Coordinator shall provide to the applicable Vice Chancellor a written report of key evidentiary findings, based upon a preponderance of the evidence, whether the alleged harassing conduct constituted a violation of this policy as being unlawful or sexual harassment and the Title IX Coordinator's recommended resolutions pertaining to the complaint. The Title IX Coordinator's report is deemed a confidential personnel record of the respondent employee and shall not be disclosed except as required or permitted by law. The applicable Vice Chancellor shall be responsible for determining what University action, if any, is warranted.

Upon completion of his/her investigation, the Title IX Coordinator also shall provide a written response to: (1) the complaining employee apprising him/her that the investigation is complete and whether the alleged harassing conduct constituted a violation of this policy; and (2) the respondent employee apprising him/her that the investigation is complete and whether the alleged harassing conduct constituted a violation of this policy.

(d) Internal Appeals of Section VII.B.1 Complaint Resolution

Both the complaining employee and the respondent employee may appeal the Title IX Coordinator's finding(s) and conclusions within fifteen (15) calendar days of receipt of the Title IX Coordinator's written response. Appeals must be in writing and clearly state the basis for the appeal. Appeals must be directed to the Director of Human Resources at 220 HFR Administration Building, Cullowhee, NC, 28723. The Director of Human Resources may be reached by telephone at (828) 227-7218. The Director of Human Resources shall respond to the appeal within thirty (30) calendar days of receipt, and may either uphold, overturn, or modify the finding(s). No further appeal by either party shall be permitted.

2. Complaints from SHRA Employees against Other Employees or Agents

SHRA employees should also refer to University Policy #77, "Grievance Policies and Procedures for SHRA Employees". <http://www.wcu.edu/about-wcu/leadership/office-of-the-chancellor/university-policies/numerical-index/university-policy-77.asp>

(a) Initiating Section VII.B.2 Complaints

Complaints should be reported, preferably in writing, to the Title IX Coordinator at 520 HFR Administration Building, Cullowhee, NC, 28723. The Title IX Coordinator may be reached by telephone at (828) 227-7116. Complaints should be made within fifteen (15) calendar days of the alleged harassing action to ensure a prompt and complete investigation; however, the University reserves the right to initiate investigations and take action at any time depending on the nature of the alleged harassing action. Former SHRA employees must submit a written complaint within fifteen (15) calendar days from the alleged harassing action or within fifteen (15) days from the employee's last day of employment, whichever is earlier.

A complaining SHRA employee has the right at any time to bypass or discontinue the University's complaint process and file a charge directly with the EEOC.

A complaining SHRA employee also has the right to file a simultaneous complaint under Title VII of the Civil Rights Act of 1964 with the EEOC along with a University internal complaint.

A complaining SHRA employee may not file a contested case with the North Carolina Office of Administrative Hearings if the University's internal complaint process has not been completed.

(b) Investigation of Section VII.B.2 Complaints

The Title IX Coordinator shall investigate thoroughly and impartially all complaints. The University has forty-five (45) calendar days from receipt of the complaint to investigate and respond to the complaining employee, unless the employee and the University mutually agree in writing to extend the time due to occurrences that are beyond the control of the parties. Such extension may not exceed fifteen (15) days. The Title IX Coordinator may seek the assistance of other University officials, including the deputy Title IX Coordinators, in situations where there may be actual or perceived conflicts of interest or as otherwise may be necessary to ensure timely, impartial, and complete investigations.

(c) Written Report/Resolution of Section VII.B.2 Complaints

Upon completion of the Title IX Coordinator's investigation, the Title IX Coordinator shall provide to the applicable Vice Chancellor a written report of key evidentiary findings, based upon a preponderance of the evidence, whether the alleged harassing conduct constituted a violation of this policy as being unlawful or sexual harassment and the Title IX Coordinator's recommended resolutions pertaining to the complaint. The Title IX Coordinator's report is deemed a confidential personnel record of the respondent employee and shall not be disclosed except as required or permitted by law.

Upon completion of his/her investigation, the Title IX Coordinator also shall provide a written response to: (1) the complaining employee apprising him/her that the investigation is complete and whether the alleged harassing conduct constituted a violation of this policy; and (2) the respondent employee apprising him/her that the investigation is complete and whether the alleged harassing conduct constituted a violation of this policy.

The Vice Chancellor shall provide the complaining employee with his/her written decision regarding whether this policy has been violated within forty-five (45) calendar days of receipt of the employee's written complaint.

If there is reasonable cause to believe that unlawful or sexual harassment or retaliation occurred, the Vice Chancellor shall take appropriate action to resolve the matter. If the complaint is successfully resolved, the complaining employee will sign a letter of agreement prepared by Human Resources detailing the terms of the resolution. If the complaint is not successfully resolved, then the complaining employee may file a formal SHRA grievance pursuant to University Policy #77 within fifteen **(15) calendar days** of receipt of the Vice Chancellor's written decision.

If the investigation results show no reasonable cause to believe that unlawful or sexual harassment or retaliation occurred and the complaining employee disagrees with the conclusions of the investigation, the complaining employee may file a formal SHRA grievance pursuant to University Policy #77 within fifteen **(15) calendar days** of receipt of the Vice Chancellor's written decision and/or appeal the decision pursuant to Section VII.B.2.d below.

(d) Internal Appeals of Section VII.B.2 Complaint Resolution

Both the complaining employee and the respondent employee may appeal the Title IX Coordinator's finding(s) and conclusions within fifteen (15) calendar days of receipt of the Title IX Coordinator's written response. Appeals must be in writing and clearly state the basis for the appeal. Appeals must be directed to Director of Human Resources at 220 HFR Administration Building, Cullowhee, NC, 28723. The Director of Human Resources may be reached by telephone at (828) 227-7218. The Director of Human Resources shall respond to the appeal within thirty (30) calendar days of receipt, and may either uphold, overturn, or modify the finding(s). No further internal appeals by either party under this policy shall be permitted.

3. Complaints from EHRA Faculty and Non-Faculty and SHRA Employees against Students

Complaints from any employee about a student should be reported to the DSCE for investigation and appropriate action. The DSCE office telephone number is (828) 227-7234 and the office is located in Scott Hall East, Cullowhee, NC 28723. Complaints should be made within fifteen (15) calendar days of the alleged harassing action to ensure a prompt, impartial, and complete investigation; however, the University reserves the right to initiate investigations and take action at any time depending on the nature of the alleged harassing action.

Investigations, resolutions, and appeals shall be governed by the Student Code.

4. Complaints from Agents or the General Public

Complaints from University Agents or the general public about University employees should be initiated and investigated in accordance with Section VII.B.1 above. Complaints about students should be initiated and

investigated in accordance with Section VII.B.3 above.

VIII. COMPLAINTS FROM STUDENTS

THE STUDENT CODE EXERCISES THE CHANCELLOR'S DUTY TO REGULATE MATTERS OF STUDENT CONDUCT IN THE CAMPUS COMMUNITY. THE FOLLOWING PROCEDURES ARE TO BE READ AND UNDERSTOOD IN VIEW OF THE STUDENT CODE. THIS POLICY SHALL CONTROL IN THE EVENT OF ANY CONFLICT BETWEEN THIS POLICY AND THE STUDENT CODE.

A. Student Complaints against Employees and Agents

1. Initiating Section VIII.A Complaints

Complaints should be reported, preferably in writing, to the Title IX Coordinator at 520 HFR Administration Building, Cullowhee, NC, 28723. The Title IX Coordinator may be reached by telephone at (828) 227-7116. Complaints should be made within fifteen (15) calendar days of the alleged harassing action (the conduct giving rise to the complaint) to ensure a prompt and complete investigation; however, the University reserves the right to initiate investigations and take action at any time depending on the nature of the alleged harassing conduct.

2. Investigation of Section VIII.A Complaints

The Title IX Coordinator shall investigate thoroughly and impartially all complaints within forty-five (45) calendar days from the receipt of complaints. The Title IX Coordinator may seek the assistance of other University officials, including the deputy Title IX Coordinators, in situations where there may be actual or perceived conflicts of interest or as otherwise may be necessary to ensure timely, impartial, and complete investigations.

3. Written Reports /Resolution of Section VIII.A Complaints

Upon completion of his/her investigation, the Title IX Coordinator shall provide to the applicable Vice Chancellor a written report of key evidentiary findings, based upon a preponderance of the evidence, whether the alleged harassing conduct constituted a violation of this policy as being unlawful or sexual harassment and the Title IX Coordinator's recommended resolutions pertaining to the complaint. The Title IX Coordinator's report is deemed a confidential personnel record of the respondent employee and shall not be disclosed except as required or permitted by law. The applicable Vice Chancellor shall be responsible for determining what University action, if any, is warranted.

Upon completion of his/her investigation, the Title IX Coordinator also shall provide a written response to: (1) the complaining student apprising him/her that the investigation is complete and whether the alleged harassing conduct constituted a violation of this policy; and (2) the respondent employee apprising him/her

that the investigation is complete and whether the alleged harassing conduct constituted a violation of this policy.

4. Internal Appeals of Section VIII.A Complaint Resolution

Both the complaining student and the respondent employee may appeal the Title IX Coordinator's finding(s) and conclusions within fifteen (15) calendar days of receipt of the Title IX Coordinator's written response. Appeals must be in writing and clearly state the basis for the appeal. Appeals must be directed to Director of Human Resources at 220 HFR Administration Building, Cullowhee, NC, 28723. The Director of Human Resources may be reached by telephone at (828) 227-7218. The Director of Human Resources shall respond to the appeal within thirty (30) calendar days of receipt, and may either uphold, overturn, or modify the finding(s). No further appeal by either party shall be permitted.

B. Student-on-Student Sexual Harassment and Unlawful Harassment Complaints

1. Initiating Section VIII.B Complaints

Complaints of this nature should be reported, preferably in writing, to the DSCE for investigation and appropriate action. The DSCE office telephone number is (828) 227-7234, and the office is located in Scott Hall East, Cullowhee, NC 28723. Complaints should be made within thirty (30) calendar days of the alleged harassing action to ensure a prompt, impartial, and complete investigation; however, the University reserves the right to initiate investigations and take action at any time depending on the nature of the alleged harassing action.

Complaints should include the name and contact information of the complainant, the specific conduct that is the subject of the complaint, the name and contact information, if known, of the accused individual, and the name(s) and contact information of witnesses or other individuals having direct knowledge of the complaint.

2. Investigation of Section VIII.B Complaints

Complaints of this nature shall be investigated as provided in the Student Code and applicable University and UNC policies. Upon receipt of these complaints, the DSCE shall notify the Title IX Coordinator and the Deputy Title IX Coordinators from the Division of Student Affairs who shall supervise or assist with the investigation.

Investigations must be completed within forty-five (45) calendar days from receipt of a complaint. Upon completion of its investigation, if the DSCE investigator has reason to believe that a violation of the Student Code has occurred charges will be filed against the accused student.

3. Formal Resolution/Adjudicatory Hearings of Section VIII.B Complaints

Complaints of this nature may not be resolved by mutual resolution and waiver of hearing as provided for other disciplinary matters under the Student Code.

If charges are to be pursued, the matter shall be referred to a hearing body as provided in the Student Code. In cases of this nature, students may not participate on hearing bodies. Hearings shall be conducted consistent with the hearing procedures provided in the Student Code.

In accordance with UNC Policy 700.4.1.1[R], students who have been accused (charged) of a violation of the Student Code may be represented by an advocate (e.g., a lawyer)

4. Written Report/Resolution of Section VIII.B Complaints

Written notification of the hearing body's findings and recommended sanction(s) shall be provided to both the complaining student and the accused student within ten (10) calendar days from the conclusion of the hearing. Written notification shall include information concerning the students' opportunity to appeal the hearing body's findings and recommendations, in accordance with the Student Code.

5. Internal Appeals of Section VIII.B Complaint Resolution

In cases of this nature, both the complaining student and the accused student may appeal the findings and decision of the hearing body as provided in the Student Code.

C. Student-on-Student Sexual Misconduct Complaints

SEXUAL ASSAULT AWARENESS: GET HELP; GET EDUCATED; GET INVOLVED

<http://www.wcu.edu/student-life/division-of-student-affairs/Sexual-Assault-Awareness/>

1. Reporting Crime to University Police and Anonymous Reporting

Complaints of sexual misconduct, including sexual assault, may be filed with the University Police. Students should report crimes to the University Police Dispatch Emergency Number (828) 227-8911 or the non-emergency number of (828) 227-7301. In addition to investigating complaints of sexual assault, University Police will refer such cases to DSCE and will also refer all such cases to the Jackson County District Attorney.

A student may make an anonymous complaint to University Police through its **Silent Witness** program at: <http://www.wcu.edu/about-wcu/campus-services-and-operations/university-police/university-police-forms/silent-witness-submit-an-anonymous-report.asp>

A student may also make an anonymous complaint to University Police by calling the **Police TIPS Line** at: (828) 227-8477.

The University Police have adopted Sexual Assault Investigation Policies to provide officers and investigators with guidelines for responding to reports of sexual assault, assisting victims, collaborating with local health and service agencies, and conducting interviews with victims, witnesses, and suspects.

Because of the special needs involved in sexual assault investigations, their policy is an all-inclusive document that covers first response, investigation, and prosecution. The department has a Victim Services Office, which may be contacted at: (828) 227-3059 or (828) 227-7301.

2. Initiating Section VIII.C Complaints

Complaints of sexual misconduct, including sexual assault, also may be filed with DSCE.

Complaints of this nature should be reported, preferably in writing, to the DSCE for investigation and appropriate action. The DSCE office telephone number is (828) 227-7234, and the office is located in Scott Hall East, Cullowhee, NC 28723. Complaints should be made within thirty (30) calendar days of the alleged harassing action to ensure a prompt, impartial, and complete investigation; however, the University reserves the right to initiate investigations and take action at any time depending on the nature of the alleged harassing action.

Complaints should include the name and contact information of the complainant, the specific conduct that is the subject of the complaint, the name and contact information, if known, of the accused individual, and the name(s) and contact information of witnesses or other individuals having direct knowledge of the complaint.

3. Investigation of Section VIII.C Complaints

Complaints of this nature shall be investigated as provided in the Student Code and applicable University and UNC policies. Upon receipt of these complaints, the DSCE shall notify the Title IX Coordinator and the Deputy Title IX Coordinators from the Division of Student Affairs who shall direct or assist with the investigation.

Investigations must be completed within forty-five (45) calendar days from receipt of a complaint. Upon completion of its investigation, if the DSCE investigator has reason to believe that a violation of the Student Code has occurred charges will be filed against the accused student.

4. Formal Resolution of Section VIII.C Complaints

Complaints of this nature may not be resolved by mutual resolution and waiver of hearing as provided for other disciplinary matters under the Student Code.

If charges are to be pursued, the matter shall be referred to a hearing body as provided in the Student Code. In cases of this nature, students may not participate on hearing bodies. Hearings shall be conducted consistent with the hearing procedures provided in the Student Code.

In accordance with UNC Policy 700.4.1.1[R], students who have been accused (charged) of a violation of the Student Code may be represented by an advocate (e.g., a lawyer).

5. Written Report/Resolution of Section VIII.C Complaints

Written notification of the hearing body's findings and recommended sanction(s) shall be provided to both the complaining student and the accused student within ten (10) calendar days from the conclusion of the hearing. Written notification shall include information concerning the students' opportunity to appeal the hearing body's findings and recommendations, in accordance with the Student Code.

6. Internal Appeals of Section VIII.C Complaint Resolutions

In cases of this nature, both the complaining student and the accused student may appeal the findings and decision of the hearing body as provided in the Student Code.

IX. RETALIATION PROHIBITED

This policy seeks to encourage students and employees to report concerns involving harassing personal conduct and accordingly retaliation is prohibited. Any act of reprisal or retaliation, including interference, restraint, coercion, penalty, discrimination, harassment - overtly or covertly - against a student or employee for responsibly reporting under this Policy interferes with free expression and violates this Policy. Accordingly, individuals who violate this retaliation prohibition may be subject to prompt disciplinary action.

X. Employee's Obligation to Report

Any University employee who experiences or witnesses an incident of sexual harassment, sexual misconduct, unlawful harassment or related retaliation, or receives a written or verbal complaint of sexual harassment, sexual misconduct, unlawful harassment or related retaliation shall promptly report it to the Director.

XI. FRIVOLOUS OR FALSE COMPLAINTS

This policy shall not be used to bring frivolous or false complaints against students or employees. If a complaint has been made maliciously or in bad faith, disciplinary action may be taken against the person bringing the complaint.

XII. CONFIDENTIALITY

Information gathered in the course of investigations or mediation conducted under this policy will be given the full extent of confidentiality accorded by law to employee personnel records and student education records. Any person who, without authorization, reveals such information may be subject to disciplinary action. Disclosure of the content of complaints will be made on a "need to know" basis, depending on the type of investigation and remedial action required by the complaint. In any event, the accused individual will be informed of the specific allegations in the complaint.

XIII. REPORTS TO CHANCELLOR

The Title IX Coordinator is responsible for routinely and periodically reporting to the Chancellor the number and nature of complaints made under this policy.

XIV. RELATED POLICIES AND RESOURCES

- University Policy #10, [Equal Opportunity Programs](#)
- University Policy #58, [Improper Relationships between Students and Employees](#)
- [Student Code of Conduct](#)
- University Policy #109, [Campus/Workplace Violence Prevention and Management](#)

VIII. PROGRAM OBJECTIVES

Statistical Analyses

This section contains charts of all statistical information relevant to Western Carolina University's EEO Plan reporting. Specifically, please find the following pages that show the workforce analysis along with the program objectives for each occupational category. Job opening projections take into account the data on permanent staff openings filled for the six year period ending September 30, 2015. Please note that numerous circumstances can impact work force projections by race, sex and occupational category so that these are not always precise. Economic changes and turnover cause such projections to be estimates.

- Workforce Profile
- Job Group Analysis Summary
- Factor Availabilities
- Availability Analysis
- Incumbency v. Estimated Availability Detail Report
- Incumbency v. Estimated Availability Less than Reasonably Expected
- Annual Placement Goals
- Incumbency v. Goal – benchmark (Disability – Veteran) Summary
- Goals – Benchmarks (Disability – Veteran)
- Job Opening Estimates for Occupations in Which Underutilization Occurs

WORK FORCE PROFILE (9/30/2015)

Job Group	Sex	White	%	Minority	%	Total Number	%
100 Executives & Administrators	Male	33	2.2%	3	0.2%	36	2.4%
	Female	15	1.0%	2	0.1%	17	1.1%
	Total	48	3.2%	5	0.3%	53	3.5%
200 Kimmel School	Male	17	1.2%	6	0.4%	23	1.6%
	Female	2	0.1%	1	0.1%	3	0.2%
	Total	19	1.3%	7	0.1%	26	1.8%
205 Fine & Perf. Arts	Male	39	2.7%	0	0.0%	39	2.7%
	Female	17	1.2%	0	0.0%	17	1.2%
	Total	56	3.9%	0	0.00%	56	3.9%
210 Health & Human Scs.	Male	18	1.2%	0	0.0%	18	1.2%
	Female	63	4.3%	4	0.3%	67	4.6%
	Total	81	5.5%	4	0.3%	85	5.8%
220 Arts & Sciences	Male	104	7.1%	13	.9%	117	8.0%
	Female	83	5.6%	5	0.3%	88	5.9%
	Total	187	12.7%	18	1.2%	205	13.9%
230 Business	Male	32	2.2%	6	0.4%	38	2.6%
	Female	20	1.4%	1	0.07%	21	1.5%
	Total	52	3.6%	7	0.5%	59	4.1%
240 Education & Allied Prof.	Male	33	2.2%	2	0.1%	35	2.3%
	Female	48	3.3%	5	0.3%	53	3.6%
	Total	81	5.5%	7	0.4%	88	5.9%
250 Library	Male	1	0.1%	0	0.0%	1	0.1%
	Female	11	0.7%	3	0.2%	14	0.9%
	Total	12	.8%	3	0.2%	15	1.0%
260 Athletics	Male	26	1.8%	6	0.4%	32	2.2%
	Female	8	0.5%	2	0.1%	10	0.6%
	Total	34	2.3%	8	0.5%	42	2.8%
300 Professional	Male	115	7.8%	12	0.8%	127	8.6%
	Female	169	11.5%	24	1.6%	193	13.1%
	Total	284	19.3%	36	2.4%	320	21.7%
400 Technical	Male	76	5.2%	4	0.3%	80	5.5%
	Female	32	2.1%	4	0.3%	36	2.4%
	Total	108	7.3%	8	0.6%	116	7.9%
500 Administrative Support	Male	5	0.3%	3	0.2%	8	0.5%
	Female	144	9.8%	7	0.5%	151	10.3%
	Total	149	10.1%	10	0.7%	159	10.8%
600 Skilled Crafts	Male	73	5.0%	2	0.1%	75	5.1%
	Female	3	0.2%	0	0.0%	3	0.2%
	Total	76	5.2%	2	0.1%	78	5.3%
720 Safety & Security	Male	20	1.4%	3	0.2%	23	1.6%
	Female	3	0.2%	1	0.1%	4	0.3%
	Total	23	1.6%	4	0.3%	27	1.9%
730 Other Auxiliary Services	Male	77	5.2%	4	0.3%	81	5.5%
	Female	60	4.1%	1	0.1%	61	4.2%
	Total	137	9.3%	5	0.4%	142	9.7%
Totals	Male	669	45.4%	64	4.5%	733	49.9%
	Female	678	47.1%	60	2.9%	738	50.1%
	Total	1347	92.6	124	7.4%	1471	100.0%

Job Group Analysis Summary

WCU 2015-2016 EEO Plan
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Job Group	Total	Total Min			Total		White		Black		Hisp		Asian		Amlnd		NHOPI		Two+	
		#	%		#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
100	53	5	0.43	Male	36	67.02	33	62.26	2	3.77	0	0.00	0	0.00	0	0.00	1	1.89	0	0.00
				Female	17	32.08	15	28.30	2	3.77	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
200	26	7	26.92	Male	23	88.46	17	65.38	0	0.00	0	0.00	6	23.08	0	0.00	0	0.00	0	0.00
				Female	3	11.54	2	7.69	0	0.00	0	0.00	1	3.85	0	0.00	0	0.00	0	0.00
205	56	0	0.00	Male	39	69.64	39	69.64	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
				Female	17	30.36	17	30.36	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
210	85	4	4.71	Male	18	21.18	18	21.18	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
				Female	67	78.82	63	74.12	0	0.00	1	1.18	2	2.35	0	0.00	0	0.00	1	1.18
220	205	18	8.78	Male	117	57.07	104	50.73	4	1.95	3	1.46	3	1.46	1	0.49	0	0.00	2	0.98
				Female	88	42.93	83	40.49	0	0.00	0	0.00	4	1.95	0	0.00	0	0.00	0	0.00
230	59	7	11.86	Male	38	64.41	32	54.24	0	0.00	1	1.69	5	8.47	0	0.00	0	0.00	0	0.00
				Female	21	35.59	20	33.90	0	0.00	0	0.00	1	1.69	0	0.00	0	0.00	0	0.00
240	88	7	7.95	Male	35	39.77	33	37.50	2	2.27	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
				Female	53	60.23	48	54.55	2	2.27	0	0.00	1	1.14	2	2.27	0	0.00	0	0.00
250	15	3	20.00	Male	1	6.67	1	6.67	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
				Female	14	93.33	11	73.33	0	0.00	1	6.67	1	6.67	0	0.00	0	0.00	0	0.00
260	42	8	19.05	Male	32	76.19	26	61.90	5	11.90	0	0.00	0	0.00	0	0.00	0	0.00	1	2.38
				Female	10	23.81	8	19.05	2	4.76	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
300	320	36	11.25	Male	127	39.69	115	35.94	4	1.25	2	0.63	1	0.31	2	0.63	0	0.00	3	0.94
				Female	193	60.31	169	52.81	10	3.13	5	1.56	3	0.94	3	0.94	0	0.00	0	0.00
400	116	8	6.90	Male	80	68.97	76	65.52	0	0.00	0	0.00	2	1.72	0	0.00	0	0.00	2	1.72
				Female	36	31.03	32	27.59	1	0.86	0	0.00	1	0.86	1	0.86	0	0.00	0	0.00
500	159	10	6.29	Male	8	5.03	5	3.14	0	0.00	0	0.00	1	0.63	0	0.00	0	0.00	2	1.26
				Female	151	94.97	144	90.57	1	0.63	2	1.26	0	0.00	0	0.00	0	0.00	0	0.00

Job Group Analysis Summary

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Job Group	Total	Total Min			Total		White		Black		Hisp		Asian		Amind		NHOPI		Two+	
		#	%		#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
600	78	2	2.50	Male	75	96.15	73	93.59	0	0.00	1	1.28	0	0.00	1	1.28	0	0.00	0	0.00
				Female	3	3.85	3	3.85	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
720	27	4	14.81	Male	23	85.19	20	74.07	1	3.70	1	3.70	0	0.00	1	3.70	0	0.00	0	0.00
				Female	4	14.81	3	11.11	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
730	142	5	3.52	Male	81	57.04	77	54.23	2	1.41	0	0.00	0	0.00	1	0.70	0	0.00	0	0.00
				Female	61	42.96	60	42.25	0	0.00	1	0.70	0	0.00	0	0.00	0	0.00	0	0.00
Facility Total	1471	124	8.43	Male	733	49.83	669	45.48	20	1.30	8	0.54	18	1.22	6	0.41	1	0.07	11	0.75
% of Total				Female	738	50.17	678	40.09	18	1.22	10	0.68	14	0.95	6	0.41	0	0.00	12	0.82

Factor Availabilities

WCU 2015-2016 EEO Plan
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Job Group	Female (%)	Minority (%)	Black (%)	Hisp (%)	Asian (%)	A/Ind (%)	NHOPI (%)	Two+ (%)
Factor 1 - Requisite Skills In Reasonable Recruiting Area								
100 <i>Labor Area: United States</i>	38.70	21.28	7.01	7.88	5.04	0.79	0.10	0.46
200 <i>Labor Area: SED (1998-2008)</i>	16.85	30.73	3.87	3.84	18.79	0.45	0.00	3.79
205 <i>Labor Area: SED (1998-2008)</i>	56.51	17.93	5.30	3.46	5.47	0.41	0.00	3.30
210 <i>Labor Area: SED (1998-2008)</i>	68.75	22.79	8.73	4.11	6.71	0.49	0.00	2.74
220 <i>Labor Area: SED (1998-2008)</i>	42.34	21.08	4.02	4.47	8.72	0.41	0.00	3.46
230 <i>Labor Area: SED (1998-2008)</i>	38.86	25.39	7.46	3.84	10.21	0.67	0.00	3.22
240 <i>Labor Area: SED (1998-2008)</i>	68.19	22.67	9.74	5.21	3.88	0.75	0.00	3.09
250 <i>Labor Area: SED (1998-2008)</i>	63.14	26.15	9.96	3.74	6.85	1.49	0.00	4.11
260 <i>Labor Area: United States</i>	47.20	22.24	6.54	8.90	5.28	0.77	0.10	0.65
300 <i>Labor Area: United States</i>	62.50	26.65	10.28	9.26	5.56	0.85	0.12	0.57
400 <i>Labor Area: Custom - WCU Four County Recruitment Area</i>	41.92	14.69	0.33	0.70	8.81	4.83	0.00	0.02
500 <i>Labor Area: Custom - WCU Four County Recruitment Area</i>	77.71	5.87	1.36	2.36	0.21	1.93	0.00	0.00
600 <i>Labor Area: Custom - WCU Four County Recruitment Area</i>	5.43	5.55	1.47	2.79	0.70	0.00	0.00	0.59
720 <i>Labor Area: Custom - WCU Four County Recruitment Area</i>	27.75	12.53	4.63	4.63	0.00	3.28	0.00	0.00
730 <i>Labor Area: Custom - WCU Four County Recruitment Area</i>	44.28	12.82	1.17	5.20	0.13	3.38	0.00	2.95

Factor Availabilities

WCU 2015-2016 EEO Plan
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Job Group	Female (%)	Minority (%)	Black (%)	Hisp (%)	Asian (%)	AmInd (%)	NHOPi (%)	Two+ (%)
Factor 2 - Promotable, Transferable, and Trainable within Organization								
100	48.55	12.28	3.06	1.47	5.77	0.48	0.00	1.51
200	4.17	40.42	0.00	0.00	40.42	0.00	0.00	0.00
205	18.47	0.00	0.00	0.00	0.00	0.00	0.00	0.00
210	85.46	0.72	0.00	0.18	0.36	0.00	0.00	0.18
220	37.84	15.59	0.62	0.41	2.58	11.11	0.00	0.87
230	66.23	2.63	0.00	0.00	2.63	0.00	0.00	0.00
240	78.65	4.56	1.04	0.00	0.35	3.17	0.00	0.00
250	80.00	28.00	0.00	20.00	4.00	0.00	0.00	4.00
260	22.22	16.27	13.49	0.00	0.00	0.00	0.00	2.78
300	55.15	15.25	0.89	13.39	0.00	0.96	0.00	0.00
400	38.61	4.42	0.00	0.00	1.02	0.00	0.00	3.40
500	94.28	7.68	0.98	1.54	0.56	0.00	0.00	4.61
600	9.81	3.16	0.09	0.84	0.00	0.84	0.00	1.39
720	23.03	12.73	3.03	3.03	0.00	0.00	0.00	6.67
730	39.90	3.95	0.21	0.21	0.00	0.21	0.00	3.33

Availability Analysis

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Job Group: 100

Factor	Raw Statistics (%)								Value Weight	Weighted Factor (%)							
	Female	Total Min	Black	Hisp	Asian	Amind	NHOPI	Two+		Female	Total Min	Black	Hisp	Asian	Amind	NHOPI	Two+
1 Percentage of Minorities and Women Among Those Having Requisite Skills in the Reasonable Recruitment Area	38.70	21.28	7.01	7.88	5.04	0.79	0.10	0.46	80.00	30.96	17.02	5.61	6.30	4.03	0.63	0.08	0.37
	Source of Data: Census 2010 Special EEO File United States																
2 Percentage of Minorities and Women Among Those Promotable, Transferable and Trainable within the Contractor's Organization	48.55	12.28	3.06	1.47	5.77	0.48	0.00	1.51	20.00	9.71	2.46	0.61	0.29	1.15	0.10	0.00	0.30
	Source of Data: Feeder Job Groups: (200), (205), (210), (220), (230), (240), (250), (260), (300)																
100.00																	
Job Group Final Availabilities (%)										40.67	19.48	6.22	6.60	5.19	0.73	0.08	0.67

Availability Analysis

WCU 2015-2016 EEO Plan
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Job Group: 200

Factor	Raw Statistics (%)								Value Weight	Weighted Factor (%)							
	Female	Total Min	Black	Hisp	Asian	Amind	NHOPI	Two+		Female	Total Min	Black	Hisp	Asian	Amind	NHOPI	Two+
1 Percentage of Minorities and Women Among Those Having Requisite Skills in the Reasonable Recruitment Area	16.85	30.73	3.87	3.84	18.79	0.45	0.00	3.79	85.00	14.32	26.12	3.29	3.27	15.97	0.38	0.00	3.22
	Source of Data: Census 2010 Special EEO File SED (1998-2008)																
2 Percentage of Minorities and Women Among Those Promotable, Transferable and Trainable within the Contractor's Organization	4.17	40.42	0.00	0.00	40.42	0.00	0.00	0.00	15.00	0.63	6.06	0.00	0.00	6.06	0.00	0.00	0.00
	Source of Data: Feeder Job Titles																
100.00																	
Job Group Final Availabilities (%)									14.94	32.18	3.29	3.27	22.03	0.38	0.00	3.22	

Availability Analysis

WCU 2015-2016 EEO Plan
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Job Group: 205

Factor	Raw Statistics (%)								Value Weight	Weighted Factor (%)							
	Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+		Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+
1 Percentage of Minorities and Women Among Those Having Requisite Skills in the Reasonable Recruitment Area	56.51	17.93	5.30	3.46	5.47	0.41	0.00	3.30	85.00	48.03	15.24	4.50	2.94	4.65	0.35	0.00	2.80
	Source of Data: Census 2010 Special EEO File SED (1998-2008)																
2 Percentage of Minorities and Women Among Those Promotable, Transferable and Trainable within the Contractor's Organization	18.47	0.00	0.00	0.00	0.00	0.00	0.00	0.00	15.00	2.77	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Source of Data: Feeder Job Titles																
100.00																	
Job Group Final Availabilities (%)																	
									50.80	15.24	4.50	2.94	4.65	0.35	0.00	2.80	

Availability Analysis

WCU 2015-2016 EEO Plan
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Job Group: 210

Factor	Raw Statistics (%)								Value Weight	Weighted Factor (%)							
	Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+		Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+
1 Percentage of Minorities and Women Among Those Having Requisite Skills in the Reasonable Recruitment Area	68.75	22.79	8.73	4.11	6.71	0.49	0.00	2.74	85.00	58.44	19.37	7.42	3.49	5.70	0.42	0.00	2.33
	Source of Data: Census 2010 Special EEO File SED (1998-2008)																
2 Percentage of Minorities and Women Among Those Promotable, Transferable and Trainable within the Contractor's Organization	85.46	0.72	0.00	0.18	0.36	0.00	0.00	0.18	15.00	12.82	0.11	0.00	0.03	0.05	0.00	0.00	0.03
	Source of Data: Feeder Job Titles																
100.00																	
Job Group Final Availabilities (%)										71.26	19.48	7.42	3.52	5.76	0.42	0.00	2.35

Availability Analysis

WCU 2015-2016 EEO Plan
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Job Group: 220

Factor	Raw Statistics (%)								Value Weight	Weighted Factor (%)							
	Female	Total Min	Black	Hisp	Asian	Amind	NHOPI	Two+		Female	Total Min	Black	Hisp	Asian	Amind	NHOPI	Two+
1 Percentage of Minorities and Women Among Those Having Requisite Skills in the Reasonable Recruitment Area	42.34	21.08	4.02	4.47	8.72	0.41	0.00	3.46	85.00	35.99	17.92	3.42	3.80	7.41	0.35	0.00	2.94
	Source of Data: Census 2010 Special EEO File SED (1998-2008)																
2 Percentage of Minorities and Women Among Those Promotable, Transferable and Trainable within the Contractor's Organization	37.84	15.59	0.62	0.41	2.58	11.11	0.00	0.87	15.00	5.68	2.34	0.09	0.06	0.39	1.67	0.00	0.13
	Source of Data: Feeder Job Titles																
100.00																	
Job Group Final Availabilities (%)									41.67	20.26	3.51	3.86	7.80	2.02	0.00	3.07	

Availability Analysis

WCU 2015-2016 EEO Plan
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Job Group: 230

Factor	Raw Statistics (%)								Value Weight	Weighted Factor (%)							
	Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+		Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+
1 Percentage of Minorities and Women Among Those Having Requisite Skills in the Reasonable Recruitment Area	38.86	25.39	7.46	3.84	10.21	0.67	0.00	3.22	85.00	33.03	21.58	6.34	3.26	8.67	0.57	0.00	2.74
	Source of Data: Census 2010 Special EEO File SED (1998-2008)																
2 Percentage of Minorities and Women Among Those Promotable, Transferable and Trainable within the Contractor's Organization	66.23	2.63	0.00	0.00	2.63	0.00	0.00	0.00	15.00	9.93	0.39	0.00	0.00	0.39	0.00	0.00	0.00
	Source of Data: Feeder Job Titles																
100.00																	
Job Group Final Availabilities (%)										42.97	21.97	6.34	3.26	9.07	0.57	0.00	2.74

Availability Analysis

WCU 2015-2016 EEO Plan
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Job Group: 240

Factor	Raw Statistics (%)								Value Weight	Weighted Factor (%)							
	Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+		Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+
1 Percentage of Minorities and Women Among Those Having Requisite Skills in the Reasonable Recruitment Area	68.19	22.67	9.74	5.21	3.88	0.75	0.00	3.09	85.00	57.96	19.27	8.28	4.43	3.30	0.63	0.00	2.63
	Source of Data: Census 2010 Special EEO File SED (1998-2008)																
2 Percentage of Minorities and Women Among Those Promotable, Transferable and Trainable within the Contractor's Organization	78.65	4.56	1.04	0.00	0.35	3.17	0.00	0.00	15.00	11.80	0.68	0.16	0.00	0.05	0.48	0.00	0.00
	Source of Data: Feeder Job Titles																
100.00																	
Job Group Final Availabilities (%)										69.76	19.95	8.43	4.43	3.35	1.11	0.00	2.63

Availability Analysis

WCU 2015-2016 EEO Plan
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Job Group: 250

Factor	Raw Statistics (%)								Value Weight	Weighted Factor (%)							
	Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+		Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+
1 Percentage of Minorities and Women Among Those Having Requisite Skills in the Reasonable Recruitment Area	63.14	26.15	9.96	3.74	6.85	1.49	0.00	4.11	90.00	56.82	23.54	8.97	3.36	6.16	1.34	0.00	3.70
	Source of Data: Census 2010 Special EEO File SED (1998-2008)																
2 Percentage of Minorities and Women Among Those Promotable, Transferable and Trainable within the Contractor's Organization	80.00	28.00	0.00	20.00	4.00	0.00	0.00	4.00	10.00	8.00	2.80	0.00	2.00	0.40	0.00	0.00	0.40
	Source of Data: Feeder Job Titles																
100.00																	
Job Group Final Availabilities (%)										64.82	26.34	8.97	5.36	6.56	1.34	0.00	4.10

Availability Analysis

WCU 2015-2016 EEO Plan
10/01/2015

Job Group: 260

Factor	Raw Statistics (%)								Value Weight	Weighted Factor (%)							
	Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+		Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+
1 Percentage of Minorities and Women Among Those Having Requisite Skills in the Reasonable Recruitment Area	47.20	22.24	6.54	8.90	5.28	0.77	0.10	0.65	90.00	42.48	20.01	5.88	8.01	4.75	0.69	0.09	0.58
	Source of Data: Census 2010 Special EEO File United States																
2 Percentage of Minorities and Women Among Those Promotable, Transferable and Trainable within the Contractor's Organization	22.22	16.27	13.49	0.00	0.00	0.00	0.00	2.78	10.00	2.22	1.63	1.35	0.00	0.00	0.00	0.00	0.28
	Source of Data: Feeder Job Titles																
100.00																	
Job Group Final Availabilities (%)										44.70	21.64	7.23	8.01	4.75	0.69	0.09	0.86

Availability Analysis

WCU 2015-2016 EEO Plan
10/01/2015

Job Group: 300

Factor	Raw Statistics (%)								Value Weight	Weighted Factor (%)							
	Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+		Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+
1 Percentage of Minorities and Women Among Those Having Requisite Skills in the Reasonable Recruitment Area	62.50	26.65	10.28	9.26	5.56	0.85	0.12	0.57	75.00	46.88	19.98	7.71	6.95	4.17	0.64	0.09	0.42
	Source of Data: Census 2010 Special EEO File United States																
2 Percentage of Minorities and Women Among Those Promotable, Transferable and Trainable within the Contractor's Organization	55.15	15.25	0.89	13.39	0.00	0.96	0.00	0.00	25.00	13.79	3.81	0.22	3.35	0.00	0.24	0.00	0.00
	Source of Data: Feeder Job Titles																
									100.00								
Job Group Final Availabilities (%)										60.66	23.80	7.93	10.30	4.17	0.88	0.09	0.42

Availability Analysis

WCU 2015-2016 EEO Plan
10/01/2015

Job Group: 400

Factor	Raw Statistics (%)								Value Weight	Weighted Factor (%)							
	Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+		Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+
1 Percentage of Minorities and Women Among Those Having Requisite Skills in the Reasonable Recruitment Area	41.92	14.69	0.33	0.70	8.81	4.83	0.00	0.02	75.00	31.44	11.02	0.25	0.52	6.61	3.62	0.00	0.02
	Source of Data: Census 2010 Special EEO File WCU Four County Recruitment Area																
2 Percentage of Minorities and Women Among Those Promotable, Transferable and Trainable within the Contractor's Organization	38.61	4.42	0.00	0.00	1.02	0.00	0.00	3.40	25.00	9.65	1.11	0.00	0.00	0.26	0.00	0.00	0.85
	Source of Data: Feeder Job Titles																
100.00																	
Job Group Final Availabilities (%)										41.09	12.13	0.25	0.52	6.86	3.62	0.00	0.87

Availability Analysis

WCU 2015-2016 EEO Plan
10/01/2015

Job Group: 500

Factor	Raw Statistics (%)								Value Weight	Weighted Factor (%)							
	Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+		Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+
1 Percentage of Minorities and Women Among Those Having Requisite Skills in the Reasonable Recruitment Area	77.71	5.87	1.36	2.36	0.21	1.93	0.00	0.00	75.00	58.28	4.40	1.02	1.77	0.16	1.45	0.00	0.00
	Source of Data: Census 2010 Special EEO File WCU Four County Recruitment Area																
2 Percentage of Minorities and Women Among Those Promotable, Transferable and Trainable within the Contractor's Organization	94.28	7.68	0.98	1.54	0.56	0.00	0.00	4.61	25.00	23.57	1.92	0.25	0.38	0.14	0.00	0.00	1.15
	Source of Data: Feeder Job Titles																
100.00																	
Job Group Final Availabilities (%)									81.85	6.32	1.26	2.16	0.30	1.45	0.00	1.15	

Availability Analysis

WCU 2015-2016 EEO Plan
10/01/2015

Job Group: 600

Factor	Raw Statistics (%)								Value Weight	Weighted Factor (%)							
	Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+		Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+
1 Percentage of Minorities and Women Among Those Having Requisite Skills in the Reasonable Recruitment Area	5.43	5.55	1.47	2.79	0.70	0.00	0.00	0.59	70.00	3.80	3.89	1.03	1.95	0.49	0.00	0.00	0.41
	Source of Data: Census 2010 Special EEO File WCU Four County Recruitment Area																
2 Percentage of Minorities and Women Among Those Promotable, Transferable and Trainable within the Contractor's Organization	9.81	3.16	0.09	0.84	0.00	0.84	0.00	1.39	30.00	2.94	0.95	0.03	0.25	0.00	0.25	0.00	0.42
	Source of Data: Feeder Job Titles																
100.00																	
Job Group Final Availabilities (%)									6.74	4.83	1.05	2.21	0.49	0.25	0.00	0.83	

Availability Analysis

WCU 2015-2016 EEO Plan
10/01/2015

Job Group: 720

Factor	Raw Statistics (%)								Value Weight	Weighted Factor (%)								
	Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+		Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+	
1 Percentage of Minorities and Women Among Those Having Requisite Skills in the Reasonable Recruitment Area	27.75	12.53	4.63	4.63	0.00	3.28	0.00	0.00	80.00	22.20	10.03	3.70	3.70	0.00	2.62	0.00	0.00	
	Source of Data: Census 2010 Special EEO File WCU Four County Recruitment Area																	
2 Percentage of Minorities and Women Among Those Promotable, Transferable and Trainable within the Contractor's Organization	23.03	12.73	3.03	3.03	0.00	0.00	0.00	6.67	20.00	4.61	2.55	0.61	0.61	0.00	0.00	0.00	1.33	
	Source of Data: Feeder Job Titles																	
100.00																		
Job Group Final Availabilities (%)										26.81	12.57	4.31	4.31	0.00	2.62	0.00	0.00	1.33

Availability Analysis

WCU 2015-2016 EEO Plan
10/01/2015

Job Group: 730

Factor	Raw Statistics (%)								Value Weight	Weighted Factor (%)							
	Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+		Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+
1 Percentage of Minorities and Women Among Those Having Requisite Skills in the Reasonable Recruitment Area	44.26	12.62	1.17	5.20	0.13	3.36	0.00	2.95	70.00	30.99	8.98	0.82	3.64	0.09	2.36	0.00	2.07
	Source of Data: Census 2010 Special EEO File WCU Four County Recruitment Area																
2 Percentage of Minorities and Women Among Those Promotable, Transferable and Trainable within the Contractor's Organization	39.90	3.95	0.21	0.21	0.00	0.21	0.00	3.33	30.00	11.97	1.19	0.06	0.06	0.00	0.06	0.00	1.00
	Source of Data: Feeder Job Titles																
100.00																	
Job Group Final Availabilities (%)										42.96	10.16	0.88	3.70	0.09	2.42	0.00	3.07

Incumbency v. Estimated Availability Detail

WCU 2015-2016 EEO Plan
10/01/2015

Job Group	Total Incumbents (#)	Category	Incumbents (#)	Incumbency (%)	Availability (%)	Expected Incumbents (#)	Difference (#) Exp. minus Inc.	Number of Standard Deviations	Less than Reasonably Expected?
100	53	Female	17	32.08	40.67	21.6	-4.6	-1.27	
		Minority	5	9.43	19.48	10.3	-5.3	-1.85	
		Black	4	7.55	6.22	3.3	0.7	0.40	
		Hispanic	0	0.00	6.60	3.5	-3.5	-1.93	
		Asian	0	0.00	5.19	2.7	-2.7	-1.70	
		AmIndian	0	0.00	0.73	0.4	-0.4	-0.62	
		NHOPI	1	1.89	0.08	0.0	1.0	4.71	
		Two+	0	0.00	0.67	0.4	-0.4	-0.60	
200	26	Female	3	11.54	14.94	3.9	-0.9	-0.49	
		Minority	7	26.92	32.18	8.4	-1.4	-0.57	
		Black	0	0.00	3.29	0.9	-0.9	-0.94	
		Hispanic	0	0.00	3.27	0.8	-0.8	-0.94	
		Asian	7	26.92	22.03	5.7	1.3	0.60	
		AmIndian	0	0.00	0.38	0.1	-0.1	-0.31	
		NHOPI	0	0.00	0.00	0.0	0.0	0.00	
		Two+	0	0.00	3.22	0.8	-0.8	-0.93	
205	56	Female	17	30.36	50.80	28.4	-11.4	-3.06	Yes
		Minority	0	0.00	15.24	8.5	-8.5	-3.17	Yes
		Black	0	0.00	4.50	2.5	-2.5	-1.62	
		Hispanic	0	0.00	2.94	1.6	-1.6	-1.30	
		Asian	0	0.00	4.65	2.6	-2.6	-1.65	
		AmIndian	0	0.00	0.35	0.2	-0.2	-0.44	
		NHOPI	0	0.00	0.00	0.0	0.0	0.00	
		Two+	0	0.00	2.80	1.6	-1.6	-1.27	
210	85	Female	67	78.82	71.26	60.6	6.4	1.54	
		Minority	4	4.71	19.48	16.6	-12.6	-3.44	
		Black	0	0.00	7.42	6.3	-6.3	-2.61	Yes
		Hispanic	1	1.18	3.52	3.0	-2.0	-1.17	
		Asian	2	2.35	5.76	4.9	-2.9	-1.35	
		AmIndian	0	0.00	0.42	0.4	-0.4	-0.60	
		NHOPI	0	0.00	0.00	0.0	0.0	0.00	
		Two+	1	1.18	2.35	2.0	-1.0	-0.72	

Comparison of Incumbency to Availability is performed using the Two Standard Deviation Test
 Yes indicates Number of Standard Deviations <= -2.00

Incumbency v. Estimated Availability Detail

WCU 2015-2016 EEO Plan
10/01/2015

Job Group	Total Incumbents (#)	Category	Incumbents (#)	Incumbency (%)	Availability (%)	Expected Incumbents (#)	Difference (#) Exp. minus Inc.	Number of Standard Deviations	Less than Reasonably Expected?
220	205	Female	88	42.93	41.67	85.4	2.6	0.37	Yes
		Minority	18	8.78	20.26	41.5	-23.5	-4.09	
		Black	4	1.95	3.51	7.2	-3.2	-1.21	
		Hispanic	3	1.46	3.86	7.9	-4.9	-1.78	
		Asian	7	3.41	7.80	16.0	-9.0	-2.34	
		Amindian	1	0.49	2.02	4.1	-3.1	-1.56	
		NHOPI	0	0.00	0.00	0.0	0.0	0.00	
		Two+	3	1.46	3.07	6.3	-3.3	-1.33	
230	59	Female	21	35.59	42.97	25.3	-4.3	-1.14	
		Minority	7	11.86	21.97	13.0	-6.0	-1.88	
		Black	0	0.00	6.34	3.7	-3.7	-1.99	
		Hispanic	1	1.69	3.26	1.9	-0.9	-0.68	
		Asian	6	10.17	9.07	5.4	0.6	0.29	
		Amindian	0	0.00	0.57	0.3	-0.3	-0.58	
		NHOPI	0	0.00	0.00	0.0	0.0	0.00	
		Two+	0	0.00	2.74	1.6	-1.6	-1.29	
240	88	Female	53	60.23	69.76	61.4	-8.4	-1.95	Yes
		Minority	7	7.95	19.95	17.6	-10.6	-2.82	
		Black	4	4.55	8.43	7.4	-3.4	-1.31	
		Hispanic	0	0.00	4.43	3.9	-3.9	-2.02	
		Asian	1	1.14	3.35	2.9	-1.9	-1.15	
		Amindian	2	2.27	1.11	1.0	1.0	1.04	
		NHOPI	0	0.00	0.00	0.0	0.0	0.00	
		Two+	0	0.00	2.63	2.3	-2.3	-1.54	
250	15	Female	14	93.33	64.82	9.7	4.3	2.31	
		Minority	3	20.00	26.34	4.0	-1.0	-0.56	
		Black	0	0.00	8.97	1.3	-1.3	-1.22	
		Hispanic	1	6.67	5.36	0.8	0.2	0.22	
		Asian	1	6.67	6.56	1.0	0.0	0.02	
		Amindian	0	0.00	1.34	0.2	-0.2	-0.45	
		NHOPI	0	0.00	0.00	0.0	0.0	0.00	
		Two+	1	6.67	4.10	0.6	0.4	0.50	

*Comparison of Incumbency to Availability is performed using the Two Standard Deviation Test
Yes indicates Number of Standard Deviations <= -2.00*

Incumbency v. Estimated Availability Detail

WCU 2015-2016 EEO Plan
10/01/2015

Job Group	Total Incumbents (#)	Category	Incumbents (#)	Incumbency (%)	Availability (%)	Expected Incumbents (#)	Difference (#) Exp. minus Inc.	Number of Standard Deviations	Less than Reasonably Expected?
280	42	Female	10	23.81	44.70	18.8	-8.8	-2.72	Yes
		Minority	8	19.05	21.64	9.1	-1.1	-0.41	
		Black	7	16.67	7.23	3.0	4.0	2.36	
		Hispanic	0	0.00	8.01	3.4	-3.4	-1.91	
		Asian	0	0.00	4.75	2.0	-2.0	-1.45	
		Amindian	0	0.00	0.69	0.3	-0.3	-0.54	
		NHOPI	0	0.00	0.09	0.0	0.0	-0.20	
		Two+	1	2.38	0.86	0.4	0.6	1.06	
300	320	Female	193	60.31	60.66	194.1	-1.1	-0.13	Yes
		Minority	36	11.25	23.80	76.1	-40.1	-5.27	
		Black	14	4.38	7.93	25.4	-11.4	-2.36	
		Hispanic	7	2.19	10.30	32.9	-25.9	-4.77	
		Asian	4	1.25	4.17	13.4	-9.4	-2.61	
		Amindian	5	1.56	0.88	2.8	2.2	1.31	
		NHOPI	0	0.00	0.09	0.3	-0.3	-0.53	
		Two+	6	1.88	0.42	1.4	4.6	3.99	
400	116	Female	36	31.03	41.09	47.7	-11.7	-2.20	Yes
		Minority	8	6.90	12.13	14.1	-6.1	-1.73	
		Black	1	0.86	0.25	0.3	0.7	1.32	
		Hispanic	0	0.00	0.52	0.6	-0.6	-0.78	
		Asian	3	2.59	6.86	8.0	-5.0	-1.82	
		Amindian	1	0.86	3.62	4.2	-3.2	-1.59	
		NHOPI	0	0.00	0.00	0.0	0.0	-0.05	
		Two+	3	2.59	0.87	1.0	2.0	2.00	
500	159	Female	151	94.97	81.85	130.1	20.9	4.29	
		Minority	10	6.29	6.32	10.0	0.0	-0.02	
		Black	1	0.63	1.26	2.0	-1.0	-0.72	
		Hispanic	2	1.26	2.16	3.4	-1.4	-0.78	
		Asian	1	0.63	0.30	0.5	0.5	0.76	
		Amindian	0	0.00	1.45	2.3	-2.3	-1.53	
		NHOPI	0	0.00	0.00	0.0	0.0	0.00	
		Two+	6	3.77	1.15	1.8	4.2	3.10	

*Comparison of Incumbency to Availability is performed using the Two Standard Deviation Test
Yes indicates Number of Standard Deviations <= -2.00*

Incumbency v. Estimated Availability Detail

WCU 2015-2016 EEO Plan
10/01/2015

Job Group	Total Incumbents (#)	Category	Incumbents (#)	Incumbency (%)	Availability (%)	Expected Incumbents (#)	Difference (#) Exp. minus Inc.	Number of Standard Deviations	Less than Reasonably Expected?
600	78	Female	3	3.85	6.74	5.3	-2.3	-1.02	
		Minority	2	2.56	4.83	3.8	-1.8	-0.93	
		Black	0	0.00	1.05	0.8	-0.8	-0.91	
		Hispanic	1	1.28	2.21	1.7	-0.7	-0.56	
		Asian	0	0.00	0.49	0.4	-0.4	-0.62	
		AmIndian	1	1.28	0.25	0.2	0.8	1.81	
		NHOPI	0	0.00	0.00	0.0	0.0	0.00	
		Two+	0	0.00	0.83	0.6	-0.6	-0.81	
720	27	Female	4	14.81	26.81	7.2	-3.2	-1.41	
		Minority	4	14.81	12.57	3.4	0.6	0.35	
		Black	1	3.70	4.31	1.2	-0.2	-0.15	
		Hispanic	1	3.70	4.31	1.2	-0.2	-0.15	
		Asian	0	0.00	0.00	0.0	0.0	0.00	
		AmIndian	1	3.70	2.62	0.7	0.3	0.35	
		NHOPI	0	0.00	0.00	0.0	0.0	0.00	
		Two+	1	3.70	1.33	0.4	0.6	1.07	
730	142	Female	61	42.96	42.96	61.0	0.0	0.00	Yes
		Minority	5	3.52	10.16	14.4	-9.4	-2.62	
		Black	2	1.41	0.88	1.2	0.8	0.68	
		Hispanic	1	0.70	3.70	5.3	-4.3	-1.89	
		Asian	0	0.00	0.09	0.1	-0.1	-0.36	
		AmIndian	1	0.70	2.42	3.4	-2.4	-1.33	
		NHOPI	0	0.00	0.00	0.0	0.0	0.00	
		Two+	1	0.70	3.07	4.4	-3.4	-1.63	

Comparison of Incumbency to Availability is performed using the Two Standard Deviation Test
Yes indicates Number of Standard Deviations <= -2.00

Incumbency v. Estimated Availability

WCU 2015-2016 EEO Plan
10/01/2015

Job Group	Less than Reasonably Expected?							
	Female	Minority	Black	Hisp	Asian	AmInd	NHOPI	Two+
100								
200								
205	Yes	Yes						
210		Yes	Yes					
220		Yes			Yes			
230								
240		Yes		Yes				
250								
260	Yes							
300		Yes	Yes	Yes	Yes			
400	Yes							
500								
600								
720								
730		Yes						

*Comparison of Incumbency to Availability is performed using the Two Standard Deviation Test
Yes indicates Number of Standard Deviations <= -2.00*

Annual Placement Goals

WCU 2015-2016 EEO Plan
10/01/2015

Job Group	Placement Goals (%)							
	Female	Minority	Black	Hisp	Asian	Amind	NHOPI	Two+
100 Administrators	-	-	-	-	-	-	-	-
200 Faculty, Kimmel School	-	-	-	-	-	-	-	-
205 Faculty, Fine & Perf. Arts	50.80	15.24	-	-	-	-	-	-
210 Faculty, Health & Hum Sciences	-	19.48	7.42	-	-	-	-	-
220 Faculty, Arts & Sciences	-	20.26	-	-	7.80	-	-	-
230 Faculty, Business	-	-	-	-	-	-	-	-
240 Faculty, Education & Allied Pr	-	19.95	-	4.43	-	-	-	-
250 Library	-	-	-	-	-	-	-	-
260 Athletics	44.70	-	-	-	-	-	-	-
300 Other Professionals	-	23.80	7.93	10.30	4.17	-	-	-
400 Technicians & Paraprof.	41.09	-	-	-	-	-	-	-
500 Office Support and Clerical	-	-	-	-	-	-	-	-
600 Skilled Craft Workers	-	-	-	-	-	-	-	-
720 Safety & Security	-	-	-	-	-	-	-	-
730 Other Auxiliary Services	-	10.16	-	-	-	-	-	-

Comparison of Incumbency to Availability is performed using the Two Standard Deviation Test

Incumbency v. Goal - Benchmark (Disability - Veteran) Summary

WCU 2015-2016 EEO Plan
10/01/2015

Job Group	Total Incumbents (#)	Category	Incumbents (#)	Incumbency (%)	Goal - Benchmark (%)	Less than Reasonably Expected?
100 Administrators	53	Disability Veteran	0 1	0.00 1.89	7.00 7.00	
200 Faculty, Kimmel School	26	Disability Veteran	1 2	3.85 7.69	7.00 7.00	
205 Faculty, Fine & Perf. Arts	56	Disability Veteran	1 0	1.79 0.00	7.00 7.00	Yes
210 Faculty, Health & Hum Sciences	85	Disability Veteran	3 1	3.53 1.18	7.00 7.00	Yes
220 Faculty, Arts & Sciences	205	Disability Veteran	2 1	0.98 0.49	7.00 7.00	Yes Yes
230 Faculty, Business	59	Disability Veteran	1 3	1.69 5.08	7.00 7.00	
240 Faculty, Education & Allied Pr	88	Disability Veteran	4 1	4.55 1.14	7.00 7.00	Yes
250 Library	15	Disability Veteran	2 0	13.33 0.00	7.00 7.00	
260 Athletics	42	Disability Veteran	0 0	0.00 0.00	7.00 7.00	
300 Other Professionals	320	Disability Veteran	14 4	4.38 1.25	7.00 7.00	Yes
400 Technicians & Paraprof.	116	Disability Veteran	2 4	1.72 3.45	7.00 7.00	Yes
500 Office Support and Clerical	159	Disability Veteran	5 1	3.14 0.63	7.00 7.00	Yes
600 Skilled Craft Workers	78	Disability Veteran	1 4	1.28 5.13	7.00 7.00	

*Comparison of Incumbency to Goal-Benchmark is performed using the Two Standard Deviation Test
Yes indicates Number of Standard Deviations <= -2.00*

Incumbency v. Goal - Benchmark (Disability - Veteran) Summary

WCU 2015-2016 EEO Plan
10/01/2015

Job Group	Total Incumbents (#)	Category	Incumbents (#)	Incumbency (%)	Goal - Benchmark (%)	Less than Reasonably Expected?
720 Safety & Security	27	Disability	0	0.00	7.00	
		Veteran	2	7.41	7.00	
730 Other Auxiliary Services	142	Disability	4	2.82	7.00	
		Veteran	6	4.23	7.00	
Facility Total	1471	Disability	40	2.72	7.00	Yes
		Veteran	30	2.04	7.00	Yes

*Comparison of Incumbency to Goal-Benchmark is performed using the Two Standard Deviation Test
Yes indicates Number of Standard Deviations <= -2.00*

Goals - Benchmarks (Disability - Veteran)

WCU 2015-2016 EEO Plan
10/01/2015

Job Group	Goals - Benchmarks (%)	
	Disability	Veteran
100 Administrators	-	-
200 Faculty, Kimmel School	-	-
205 Faculty, Fine & Perf. Arts	-	7.00
210 Faculty, Health & Hum Sciences	-	7.00
220 Faculty, Arts & Sciences	7.00	7.00
230 Faculty, Business	-	-
240 Faculty, Education & Allied Pr	-	7.00
250 Library	-	-
260 Athletics	-	-
300 Other Professionals	-	7.00
400 Technicians & Paraprof.	7.00	-
500 Office Support and Clerical	-	7.00
600 Skilled Craft Workers	-	-
720 Safety & Security	-	-
730 Other Auxiliary Services	-	-
Facility Total	7.00	7.00

Comparison of Incumbency to Goal-Benchmark is performed using the Two Standard Deviation Test

Job Opening Estimates

Job opening projections are based upon University data on permanent faculty and staff openings filled for the six year period of October 1, 2008 – September 30, 2014. To help determine job opening estimates, positions filled for the period are analyzed both on the whole and by respective job group. A breakdown of positions filled can be seen below:

	Executive (100)	Kimmel (200)	F&PA (205)	HHS (210)	A&S (220)	Business (230)	E&AP (240)	Library (250)	Athletics (260)	Prof (300)	Tech (400)	Admin (500)	Skilled Crafts (600)	LE (720)	Svc/M tn (730)	Total
2009	3	1	2	6	11	5	10	1	10	30	7	13	3	2	8	112
2010	1	2	1	2	25	10	7	1	5	36	10	17	2	3	23	145
2011	2	2	2	13	9	4	6	5	14	38	11	14	4	5	17	146
2012	5	5	4	9	19	5	9	0	9	43	10	19	12	3	28	180
2013	7	3	3	12	25	5	7	1	8	39	11	26	13	4	28	192
2014	7	3	7	10	28	8	10	3	2	49	10	23	2	3	22	187
2015	6	4	6	8	21	6	8	3	12	45	8	29	5	8	26	195
Total	31	20	25	60	138	43	57	14	60	280	67	141	41	28	152	1157
2016*	4.4	2.9	3.6	8.6	19.7	6.1	8.1	2.0	8.6	40	9.6	20.1	5.9	4.0	21.7	165

**Projected Openings for 2015 Plan Year. Job Groups where underutilization of minorities or females currently exists are highlighted.*

IX. IDENTIFICATION AND CORRECTION OF PROBLEM AREAS

Western Carolina University performs in-depth analysis of its total employment process to determine if there are areas where minority and/or female groups face impediments to equal opportunity. These analyses are conducted in order to reveal any potential problem areas.

Placement Goals

The goal of the university's Affirmative Action planning is for women, racial/ethnic minorities, individuals with disabilities, and/or qualified veterans to be represented on our campus to the same extent as they are represented in the appropriate labor market groups. By comparing the current year's WCU work force percentage and the labor market availability for both women, racial/ethnic minorities, individuals with disabilities, and/or protected veterans by job group, the university establishes a placement goal or benchmark for job groups in which the work force (incumbency) percent when compared to the designated labor market is less than would reasonably be expected based upon statistical analyses. The Annual Placement Goal Report (see pg. 80) and the Goals-Benchmarks Report for Disabilities/Veteran Status (see pg. 83) revealed an underutilization and corresponding goal and/or benchmark for the job groups listed below.

Placement Goals for Females:

Job Group	October 2015 Labor Market Availability (GOAL)	October 2015 Percentage of Incumbents
205 Fine & Performing Arts	50.8%	30.4%
260 Athletics	44.7%	23.8%
400 Technicians & Paraprof.	41.1%	31.0%

Placement Goals for Minorities:

Job Group	October 2015 Labor Market Availability (GOAL)	October 2015 Percentage of Incumbents
205 Fine & Performing Arts	15.2%	0.0%
210 Health & Human Sciences	19.5%	4.7%
220 Arts & Sciences	20.3%	8.8%
240 Education & Allied Prof	20.0%	8.0%
300 Other Professionals	23.8%	11.3%
400 Technicians & Paraprof.	12.1%	6.9%
730 Other Auxiliary Services	10.2%	%

Placement Goals for Individuals with Disabilities:

Job Group	October 2015 Labor Market Availability (GOAL)	October 2015 Percentage of Incumbents
220 Arts & Sciences	7.0%	3.5%
400 Technicians & Para.	7.0%	1.7%

Benchmarks for Qualified Veterans:

Job Group	October 2015 Labor Market Availability (BENCHMARK)	October 2015 Percentage of Incumbents
205 Fine & Performing Arts	7.0%	1.9%
210 Health & Human Sciences	7.0%	1.2%
220 Arts & Sciences	7.0%	.5%
240 Education & Allied Prof	7.0%	1.1%
300 Other Professionals	7.0%	1.3%
500 Office Support & Clerical	7.0%	.6%

For these job groups which have demonstrated an underutilization and where a placement goal and employment objective has been set, steps will be taken in order to increase the percentage of qualified females, minorities, individuals with disabilities, and/or qualified veterans applying for positions both externally and internally. These steps may include but are not limited to the following:

1. Strategic, targeted outreach efforts for vacancies and anticipated vacancies that are within a recognized underutilized job group.
2. Posting job advertisements in newspapers, on websites, and/or magazines that target females and/or minorities;
3. Offering job training for advancement of females and minorities currently employed by the University in order to increase chances of advancement.
4. Offering tuition waiver to employees to obtain training that will increase the chances of advancing within the organization; and
5. Continued use of the North Carolina Division of Employment Security (DES) to assist in attracting a diverse workforce.

Review of Employment Decisions

Review of employment decisions will be made in order to determine whether or not females/minorities are selected at a less favorable rate than males/non-minorities.

Review of Hires/Promotions

Whenever females/minorities are selected at a lower rate than males/on-minorities, a review of the applicant flow will be conducted to determine possible reasons why females/minorities were not selected at a more favorable rate. If the institution is not attracting enough 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.

Review of Terminations

For non-voluntary terminations, if females/minorities are being terminated at a higher rate than males/non-minorities, a review of the employee files will be made to ensure that the institution is applying its policies and procedures for termination equally for protected as well as non-protected classes.

Compensation

Annually, compensation will be reviewed in order to determine if there are any discrepancies in pay when comparing female to male rates of pay or minorities versus non-minority rates of pay. If, on average, females and/or minorities are being paid less within the same salary band and/or job title, and the difference in pay cannot be justified, Western Carolina University will put a plan in place to rectify the difference in pay for the protected class member(s). Western Carolina University

also will ensure that benefits offered to all employees are in alignment with State Government practices.

Action Oriented Programs

To further address and improve identified problem areas, Western Carolina University will institute action programs designed to eliminate the identified problem areas and to help achieve specific affirmative action goals. These programs include:

1. Conducting annual analyses of job descriptions to ensure they accurately reflect job functions;
2. Reviewing job descriptions by department and job title using job performance criteria;
3. Making job descriptions available to recruiting sources and available to all members of management involved in the recruiting, screening, selection and promotion processes;
4. Evaluating the total selection process to ensure freedom from bias through:
 - a. Reviewing job applications and other pre-employment forms to ensure information requested is job-related;
 - b. Evaluating selection methods that may have a disparate impact to ensure that they are job-related and consistent with business necessity;
 - c. Training personnel and management staff on proper interview techniques; and
 - d. Training in EEO for management and supervisory staff. There were a total of 27 University managers and supervisors who completed the Equal Employment Opportunity Institute during the 2013-2014 plan year;
5. Using techniques to improve recruitment and increase the flow of minority and female applicants. Western Carolina University has undertaken the following actions:
 - a. Include the phrase "Equal Opportunity/Affirmative Action Employer" in all printed employment advertisements;
 - b. Place recruitment advertisements, when appropriate, in minority news media and women's interest media;

- c. Disseminate information on job opportunities to organizations representing minorities, women and employment development agencies when job opportunities occur;
 - d. Encourage all employees to refer qualified applicants;
 - e. Request employment agencies to refer qualified minorities and women;
6. Ensuring that all employees are given equal opportunity for promotion. This is achieved by:
- a. Posting promotional opportunities;
 - b. Offering counseling to assist employees in identifying promotional opportunities, training and educational programs to enhance promotions and opportunities for job rotation or transfer; and
 - c. Evaluating job requirements for promotion.