

**EQUAL EMPLOYMENT OPPORTUNITY  
AND AFFIRMATIVE ACTION PROGRAM (EEO/AAP)  
FOR  
COLLEGE OF SOUTHERN NEVADA**

**2023 Affirmative Action Program (AAP)  
July 1, 2022, to June 30, 2023**

**COMPILED IN ACCORDANCE REQUIREMENTS FOR  
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**COLLEGE OF SOUTHERN NEVADA AAP**

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## **INTRODUCTION TO PARTS I AND II**

### **BACKGROUND**

The College of Southern Nevada (“CSN” or “College”) is a public institution with a mission to provide post-secondary education for the community of Southern Nevada. CSN was founded in 1971 in the State of Nevada.

CSN is a federal government supply and service contractor subject to the provisions of 41 CFR 60, the Rehabilitation Act of 1973, as amended, and the Vietnam Era ‘Veterans’ Readjustment Assistance Act of 1974, Section 4212. Because CSN has \$50,000 or more in annual contracts with the federal government and employs 50 or more employees, we are required to prepare annual written Affirmative Action Programs (‘AAP’s) for minorities and women, for protected veterans, and for individuals with disabilities for our organization. Failure to comply with these laws and their implementing regulations, which are enforced by the Office of Federal Contract Compliance Programs (OFCCP), can result in debarment of the College from future contracts and subcontracts.

Affirmative action is a term that encompasses any measure adopted by an employer to correct or to compensate for past or present discrimination or to prevent discrimination from recurring in the future. Affirmative action goes beyond the simple termination of a discriminatory practice.

As stipulated in federal regulations, a prerequisite to the development of a satisfactory affirmative action program is the evaluation of opportunities for protected group members, as well as an identification and analysis of problem areas inherent in their employment. Also, where a statistical analysis reveals a numeric disparity between incumbency and availability (and/or hiring rates for veterans), an adequate AAP details specific affirmative action steps to guarantee equal employment opportunity. These steps are keyed to the problems and needs of protected group members. For minorities and women, such steps include the development of hiring and promotion goals to rectify the disparity between incumbency and availability. For protected veterans and individuals with disabilities, such steps will include a thorough review of the College’s outreach efforts to determine the effectiveness of such efforts in closing the hiring and/or utilization gaps. It is toward this end that the following AAP of the College was developed.

### **APPLICABLE AFFIRMATIVE ACTION LAWS AND REGULATIONS**

CSN’s AAP for minorities and women (Part I) has been prepared according to Title 41, Code of Federal Regulations, Part 60-1 (Equal Employment Opportunity Duties of Government Contractors), Part 60-2 (Affirmative Action Programs of Government Non-Construction Contractors; also known as “ ‘Revised Order No. 4’”), and Part 60-20 (Sex Discrimination Guidelines for Government Contractors).

CSN has developed separately an affirmative action program for protected veterans and individuals with disabilities (Part II) prepared in accordance with the Rehabilitation Act of 1973, Section 503, as amended (Section 503) and Title 41, Code of Federal Regulations, Part 60-741(Affirmative Action Program for Individuals with Disabilities), the Vietnam Era Veterans’

Readjustment Assistance Act of 1974, Section 4212, as amended (VEVRAA), and Title 41 Code of Federal Regulations, Part 60-300 (Affirmative Action Program for protected veterans).

Under Section 503, a business with a federal contract of more than \$15,000 is required to treat qualified individuals with disabilities without discrimination on the basis of their physical or mental disability in all employment practices, and to take affirmative action to employ and advance in employment individuals with disabilities. If the College has at least 50 employees and a single contract of \$50,000 or more, then it must also develop a Section 503 AAP, as described in 41 CFR 60-741, Subpart C. Section 503 applies to businesses with federal construction contracts, but not to businesses with federally assisted construction contracts.

Under VEVRAA, a business with a federal contract of \$150,000 or more is required to treat qualified individuals without discrimination based on their status as a protected veteran in all employment practices, and to take affirmative action to employ and advance in employment protected veterans. If the College has at least 50 employees and a single contract of \$150,000 or more, then it must also develop a VEVRAA AAP, as described in 41 CFR 60-300, Subpart C. VEVRAA applies to businesses with federal construction contracts, but not to businesses with federally assisted construction contracts.

### **COVERED GROUPS UNDER AFFIRMATIVE ACTION LAWS AND REGULATIONS**

Coverage under affirmative action laws and regulations applies to:

- Women and minorities who are recognized as belonging to or identifying with the following race or ethnic groups: Blacks/African Americans, Hispanics/Latinos, Asians/Pacific Islanders, and American Indians/Alaskan Natives.
- Any veteran who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs, or who was discharged or released from active duty because of a service-connected disability.
- Recently separated veterans: any veteran currently within three-years of discharge or release from active duty.
- Veterans who served on active duty in the U.S. military during a war or campaign or expedition for which a campaign badge is awarded.
- 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 12985.
- An individual with a disability: 1) a person who has a physical or mental impairment that substantially limits one or more of his/her major life activities; (2) has a record of such impairment, or (3) is regarded as having such an impairment.

## **PROGRAM TERMINOLOGY**

The terms, “comparison of incumbency to availability,” “deficiency,” and “problem area,” appearing in this AAP, are terms CSN is required by government regulations to use. The criteria used in relation to these terms are those specified by the government. These terms have no independent legal or factual significance whatsoever. Although CSN will use the terms in total good faith in connection with its AAP, such use does not necessarily signify that the College agrees that these terms are properly applied to any particular factual situation and is not an admission of non-compliance with EEO laws, regulations, and objectives.

The comparison of incumbency to availability contained herein is required by Government regulations to be based on certain statistical comparisons. Geographic areas and sources of statistics used herein for these comparisons were used in compliance with Government regulations, as interpreted by Government representatives. The use of certain geographic areas and sources of statistics does not indicate CSN’s agreement that the geographic areas are appropriate in all instances of use or that the sources of statistics are the most relevant. The use of such geographic areas and statistics may have no significance outside the context of this AAP. Such statistics and geographic areas will be used, however, in total good faith with respect to this AAP.

The grouping of job titles into a given job group does not suggest that CSN believes the jobs so grouped are of comparable worth.

Whenever the term “goal” is used, it is expressly intended that it “should not be used to discriminate against any applicant or employee because of race, color, religion, gender, or national origin,” as stated in Title 41 Code of Federal Regulations, Part 60-2.16(e)(2).

This AAP is not intended to create any contractual or other rights in any person or entity.

## **RELIANCE ON EEOC’S GUIDELINES**

Although CSN does not believe any violation of Title VII of the Civil Rights Act exist, it has developed this AAP in accordance with and in reliance upon the EEOC’s Guidelines on Affirmative Action, Title 29 Code of Federal Regulations, Part 1608.

## **REPORTING PERIOD**

This AAP is designed to cover the following reporting period,

- AAP implementation period: July 1, 2022 to June 30, 2023
- Transaction period: July 1, 2021 to June 30, 2022

## STATEMENT OF PURPOSE FOR PARTS I AND II

This AAP has been designed to bring women and men, members of minority groups, protected veterans, and individuals with disabilities into all levels and segments of CSN's workforce in proportion to their representation in the qualified relevant labor market.

The AAP, therefore, is a detailed, results-oriented set of procedures which, when carried out, results in full compliance with equal employment opportunity requirements through the equal treatment of all people.

The manner in which this is to be accomplished becomes technical and somewhat complicated. There are several reasons for this. First, CSN is subject to and must address a variety of State and Federal laws and guidelines dealing with equal employment opportunity and affirmative action. These guidelines and requirements are in themselves somewhat technical and complex. In addition, relevant court decisions, which are often useful in interpreting, but sometimes conflicting with these requirements and guidelines, must be taken into account when developing and implementing the AAP. Furthermore, in determining CSN's current equal employment opportunity and affirmative action position and its desired future achievements, numbers, percentages, statistics, and numerous calculations and computations must come into play.

The technical, legal, and mathematical aspects of the AAP, however, all have one common purpose—to allow us to properly identify three key concepts:

1. Where we stand now,
2. Where we must go,
3. How best to get there.

These three concepts are the Affirmative Action Program.

**CSN**

**2022 AFFIRMATIVE ACTION PROGRAM**

**PART I: AFFIRMATIVE ACTION PROGRAM FOR MINORITIES AND WOMEN**

**FOR**

**JULY 1, 2022 TO JUNE 30, 2023**

**PART I**

**AAP FOR MINORITIES AND WOMEN**

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## **PART I: AAP FOR MINORITIES AND WOMEN**

### **CHAPTER 1: ORGANIZATIONAL PROFILE**

#### **41 C.F.R. § 60-2.11**

##### **Workforce Analysis/Lines of Progression**

CSN conducted a workforce analysis to identify employees at 2023 AFFIRMATIVE ACTION PROGRAM by gender and race/ethnicity in each job title. The data was collected from payroll records dated July 1, 2022.

Job titles are listed by organizational unit. Job titles are listed from lowest to highest paid. The list includes all job titles, including departmental supervision, exempt, and nonexempt titles.

For each job title, CSN identified the total number of employees, the number of male and female employees, the total number of minority employees, the male and female minority employees, the total number of employees who are White, Black, Hispanic, Asian, American Indian or Alaskan Native employees, Native Hawaiian or Pacific Islander, and Two or More races, and the male and female employees within each of these race/ethnic groups.

##### **Lines of Progression**

Developed in conjunction with the workforce analysis is information on CSN's lines of progression. Lines of progression (career ladders/career paths) identify the job titles through which an employee can move to the top of a line. For each line of progression, applicable departments are identified. These are the departments which employ persons in the job titles in the specified line of progression. Some lines of progression are limited to only one department, while others are found throughout several departments.

The lines of progression provide useful information regarding patterns of vertical and horizontal movement throughout our workforce. These patterns will be evaluated to ascertain whether they provide to our employees the optimum career mobility and opportunities for advancement.

See the *Workforce Analysis/Lines of Progression* for the results per organizational unit (available in the HR Department).

## **CHAPTER 2: JOB GROUP ANALYSIS**

### **41 C.F.R. § 60-2.12**

Although the workforce analysis was conducted individually for every job title, after it was completed, job titles were grouped for the comparison of incumbency to availability and for setting goals. There were several reasons for grouping jobs.

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

The three reasons for grouping job titles all discuss “similar” or “related” jobs. That is the most critical guideline in creating job groups. Above all, the job titles placed into a job group must be more similar or related to each other than the job titles in other job groups.

Job groups must have enough incumbents to permit meaningful comparisons of incumbency to availability and goal setting. Ideally, if a job group is identified as containing a problem area, it should be large enough that a goal of a least one whole person can be established. No minimum size has been established for this purpose, however, since it is dependent not only on the size of the job group, but also on the size of the availability percentage and the number of minorities or women already employed in the job group.

It may not be possible for a smaller contractor’s job groups to meet the guideline of not crossing EEO categories. While there are usually two or more job groups within each EEO-1 or EEO-6 category, for smaller contractors some or all of their job groups may correspond to EEO categories.

CSN did not combine job titles with different content, wages, or opportunities if doing so would have obscured problem areas (e.g., job groups which combine jobs in which minorities or women are concentrated with jobs in which they are underrepresented).

**CHAPTER 3: PLACEMENT OF INCUMBENTS IN JOB GROUPS**  
**41 C.F.R. § 60-2.13**

Each job group appears on a Job Group Report with a job group name and number. The report lists each job title in the job group. For each job title, the worksheet provides the following information: EEO reporting category, job title, employee headcounts for each job title, and overall percentages by gender and race/ethnicity as of July 1, 2022.

See the *Job Group Analysis* for the listing of the job titles and the associated race and gender headcounts per job group (available in the HR Department)..

## CHAPTER 4: DETERMINING AVAILABILITY

### 41 C.F.R. § 60-2.14

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

#### Steps in Comparison of Incumbency to Availability

##### Identify Availability Factors

The following availability factors are required of federal government contractors for consideration when developing availability estimates for each job group:

1. External Factor: The external requisite skills data comes from the 2006-2010 American Community Survey (ACS) Census of Population data.
  - A. Local labor area: A(n) “applicant/employee” Zip Code Analysis was used to identify the most precise local labor area for “COLLEGE NAME”. The final local labor area met the following two (2) conditions: 1) it includes all counties/county sets where 5% or more of the employees/applicants resided, and 2) when summed, those counties/county sets accounted for at least 78% of the total applicants/employees within the at-issue workforce. Smaller contributing counties/county sets are removed (i.e., trimmed) unless they are necessary to reach 78%. Once trimmed, the weights for the remaining counties/county sets were proportionately increased to reach 100%.
  - B. Reasonable labor area: Clark and Nye Counties in the State of Nevada.
  
2. Internal Factor: The percentage of minorities or women among those promotable, transferable, and trainable within the contractor’s organization. See the *Internal Availability Analysis* for more detail (available in the HR Department).

Assign Internal and External Factor Weights: Weights were assigned to each factor for each job group. A combination of historical data and experience were used to determine the weights. Weights were never assigned in an effort to hide or reduce problem areas.

Identify Final Availability: Weights were multiplied by the component-specific data to produce weighted data for each component. Weighted data for each component was summed. This

produced a final availability estimate for each sex and race/ethnic group, as well as for minorities in the aggregate.<sup>1</sup>

See the *Availability Analysis* for the availability breakdown for each job group (available in the HR Department).

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<sup>1</sup> In most cases, the final availability report (and most other technical reports in this AAP) only include data/information for females and minorities in the aggregate.

**CHAPTER 5: COMPARING INCUMBENCY TO AVAILABILITY**  
**41 C.F.R. § 60-2.15**

Once final availability estimates were made for each job group, CSN compared the percentage of incumbents in each job group to their corresponding availability. A comparison was made between the percentage employed as of July 1, 2022, and that group's final availability.

See the *Comparison of Incumbency to Availability* for the results per job group (available in the HR Department)..

**CHAPTER 6: PLACEMENT GOALS**  
**41 C.F.R. § 60-2.16**

CSN has established an annual percentage placement goal whenever it found that minority or female representation within a job group was less than would reasonably be expected given their availability. In each case, the goal was set at the availability figure derived for women and/or minorities, as appropriate for that job group. These goals take into account the availability of basically qualified persons in the relevant labor area. They also take into account anticipated employment opportunities with our organization. Goals are not rigid and inflexible quotas which must be met but are instead targets reasonably attainable by means of applying every good faith effort to make all aspects of the entire AAP work. These goals will be reached primarily through recruiting and advertising to increase the pool of qualified minority and female applicants and through implementation of our action-oriented programs (see Chapter 9). Selections will occur only from among qualified applicants. Goals do not require the hiring of a person when there are no vacancies or the hiring of a person who is less likely to do well on the job (“less qualified”) over a person more likely to do well on the job (“better qualified”), under valid selection procedures. Goals do not require that CSN hire a specified number of minorities or women.

A goal is a guidepost against which CSN, a community group, or a compliance agency can measure progress in remedying identified deficiencies in CSN’s workforce. By setting realistic goals, CSN should be able to meet the goals, assuming we conduct effective recruitment and advertising efforts to ensure an adequate pool of qualified minority and/or female applicants.

See the *Placement Goals* report for each job group (available in the HR Department).

**CHAPTER 7: DESIGNATION OF RESPONSIBILITY**  
**41 C.F.R. § 60-2.17(a)**

As part of its efforts to ensure equal employment opportunity to all individuals, CSN has designated specific responsibilities to various staff to ensure the AAP focuses on all components of the employment system. To that end, the CSN President, the Chief Human Resources Officer, the Director of Employee Relations and Affirmative Action Officer (AAO), and those employed as supervisors and managers have undertaken the responsibilities described below.

CSN President

The primary responsibility and accountability for implementing the AAP rests with the CSN President. This person is responsible, through the Chief Human Resources Officer and the Director of Employee Relations and AAO, for adherence to CSN's policy of equal employment opportunity and affirmative action. This role includes, but is not limited to, the following duties:

1. Designate appropriate personnel with the responsibility for overseeing, administering, implementing, and monitoring CSN's AAP. Ensure that these personnel are identified in writing by name and job title.
2. Ensure that those designated personnel responsible for all AAP components are given the necessary authority and top management support and staffing to successfully implement their assigned responsibilities.
3. Impart the personal direction that ensures total involvement and commitment to equal employment opportunity programs through CSN's AAP.

Chief Human Resources Officer

The Chief Human Resources Officer is responsible for overall supervision of the AAP. The Chief Human Resources Officer ensures, through the Director of Employee Relations and AAO and department managers and supervisors, that all relevant policies and procedures are adhered to. Successful implementation of this program is a basis for evaluating the Chief Human Resources Officer's effective work performance. The Chief Human Resources Officer's responsibilities include, but are not limited to, the following:

1. Ensure that CSN adheres to the stated policy of equal employment opportunity and monitor the application of equal employment opportunity policies.
2. Ensure that the AAP is reviewed and updated annually in accordance with CSN's stated policy.
3. Participate in periodic discussions with management, supervision, and all other employed personnel to ensure AAP and equal employment opportunity policies are being followed.



4. Review the qualifications of all employees to ensure equitable opportunity, based on job-related employment practices, is given to all for transfers and promotions.
5. Conduct periodic audits of: 1) training programs and hiring and promotion patterns to remove impediments to the attainment of AAP goals and objectives, 2) facilities to ensure they are maintained for the use and benefit of all employees and integrated both in policy and practice, and 3) sponsored educational, training, recreational, and social activities to ensure that all employees are encouraged to participate in accordance with policies on non-discrimination.
6. Ensure that all new employees receive a special orientation to CSN's equal employment opportunity policy and are thoroughly informed with regard to the AAP and its objectives.
7. Periodically analyze applicant flow to determine the mix of persons applying for employment by race/ethnic origin and gender.
8. Ensure that recruitment advertising is placed in minority and female-oriented publications, as applicable.
9. Review all job descriptions and specifications to ensure they are free of discriminatory provisions and artificial barriers. Ensure that all requirements are job-related, that they are realistic, and that they reflect the actual work requirements of the essential job duties.

#### Director of Employee Relations and AAO

The Director of Employee Relations and AAO is responsible for ensuring the directives of the CSN President and Chief Human Resources Officer are implemented. The Director of Employee Relations and AAO's duties include, but are not limited to, the following:

1. Provide direction to CSN's employees, as necessary, to carry out all actions required to meet the College's equal employment opportunity and affirmative action commitments.
2. Review, report on, and update CSN's AAP at least on an annual basis in accordance with stated policy.
3. Responsible for the design and effective implementation of the AAP at all establishments.
4. Develop, implement, and maintain audit and reporting systems to measure effectiveness of equal employment opportunity programs, including those that will indicate the need for remedial action and determine the degree to which goals and objectives have been obtained.

5. Advise management in the modification and development of CSN's policies to ensure the enhancement of equal employment opportunity for all employees and potential employees within existing equal employment opportunity guidelines.
6. Conduct periodic audits to ensure all required posters and those advertising CSN's equal employment opportunity policies and AAP are displayed and that CSN's equal employment opportunity and AAP policies are being thoroughly communicated.
7. Assist in review and revision of all policies, procedures, and rules to ensure they are not in violation of federal or state laws and regulations.

### Managers and Supervisors

In their direct day-to-day contact with CSN's employees, managers and supervisors have assumed certain responsibilities to help the College ensure compliance with equal employment opportunity programs and effective implementation of the AAP. These include, but are not limited to, the following:

1. Aggressively adhere to CSN's equal employment opportunity and affirmative action policy.
  - A. Support and assist the Chief Human Resources Officer and Director of Employee Relations and AAO in developing, maintaining, and successfully implementing the AAP.
  - B. Complete progress reports regarding the status of goal achievement.
  - C. Take action to prevent harassment of employees placed through affirmative action efforts.
2. Assign employees to significant jobs that might lead to greater personal growth and value, and counsel them with respect to what is needed for upward mobility within the employment structure.
3. Ensure that all interviews, offers of employment and/or wage commitments are consistent with CSN's policy.
4. Implement the internal promotion and transfer of all employees under their supervision consistent with AAP goals and objectives.
5. Assist in identifying problem areas and provide needed information for establishing and meeting department affirmative action goals and objectives.

**CHAPTER 8: IDENTIFICATION OF PROBLEM AREAS**  
**41 C.F.R. § 60-2.17(b)**

**Terminology**

*The phrases “comparison of incumbency to availability,” and “problem area” appearing in this chapter are terms CSN is required by government regulations to use. The criteria used in relation to these terms are those specified by the government. These terms have no independent legal or factual significance. Although CSN will use the terms in good faith in connection with its AAP, such use does not necessarily signify the College agrees that these terms are properly applied to any particular factual situation and is not an admission of non-compliance with EEO laws, regulations, and objectives. Whenever the term “goal” is used, it is expressly intended that it “should not be used to discriminate against any applicant or employee because of race, color, religion, gender, or national origin,” as stated in Title 41 Code of Federal Regulations, Part 60-2.16(e).*

In addition to comparing incumbency to availability within job groups, CSN has conducted studies to identify problem areas in each of its selection procedures (i.e., hires, promotions, and terminations). CSN will continue to monitor and update these studies during each AAP year. In each case where potential problem areas have been identified, affirmative actions, as appropriate, will be taken consistent with any of the action-oriented programs described in Chapter 9 of this AAP.

Goals are established within each of the job groups at no less than the current availability data for the job group.

**41 C.F.R. § 60-2.17(b)(1): Workforce by Organizational Unit and Job Group**

An analysis of minority and female distribution within each organizational unit was accomplished by a thorough investigation of the *Workforce Analysis* (available in the HR Department). (available in the HR Department)..

An analysis of minority and female utilization within each job group was accomplished by a thorough investigation of the *Comparison of Incumbency to Availability* reports (available in the HR Department)..

**41 C.F.R. § 60-2.17(b)(2): Personnel Activity**

Applicant flow, hires, promotions, and terminations were analyzed by job group. An analysis of selection disparities in personnel activity between men/women and whites/minorities was accomplished by a thorough examination of transaction data.

See the *Summary of Personnel Transactions Report* for each job group (available in the HR Department)..

**41 C.F.R. § 60-2.17(b)(3): Compensation Systems**

Compensation analyses were conducted by comparing the salaries for men v. women, and whites v. minorities in each job group.

**CHAPTER 9: ACTION-ORIENTED PROGRAMS**  
**41 C.F.R. § 60-2.17(c)**

CSN tailors its action-oriented programs each year to ensure they are specific to the problem identified.

Action-Oriented Program (AOPs):

The action-oriented programs designed to address the underutilization of women and minorities, the utilization goal set for individuals with disabilities, and the hiring benchmark for the protected veterans are listed below. These action-oriented programs will be carried-out throughout the AAP year. Evaluation of these AOPS will be conducted at least annually. The Chief Human Resources Officer, with the help of the managers, will be responsible in ensuring that the following are implemented.

**Recruitment:**

1. CSN will continue to place advertisements online.
2. Advertisements for open positions will always carry the Equal Employment Opportunity clause.
3. Minority and female applicants will be considered for all positions for which they are qualified.

**Job Specifications/Selection Process:**

1. Develop position descriptions that accurately reflect position functions, and are consistent for the same position from one location to another.
2. Develop job or worker specifications that contain academic, experience, and skill requirements that do not constitute inadvertent discrimination. Develop specifications that are free from bias with regard to age, race, color, gender, religion, national origin, disability or veteran status.
3. Approved position specifications and worker specifications will be made available to all members of management involved in the recruiting, screening, selection, and promotion process. Copies may also be made available to recruiting sources.
4. CSN will continue to train employees from diverse representations to serve on search committees to ensure a variety of perspectives will be involved as new faculty and staff are hired.
5. In addition to completing search committee training, which covers topics related to EEO and Affirmative Action, each search committee meets with representatives from the Office of Institutional Equity to discuss the College's commitment to diversity and goals for

creating an inclusive and diverse workforce.

6. CSN will continue to use only worker specifications that include job-related criteria.
7. CSN will continue to carefully select, and counsel all personnel involved in the recruiting, screening, selection, promotion, disciplinary, and related processes to eliminate bias in all personnel actions.
8. Work with the Marketing and Public Relations Departments to better promote CSN as a Hispanic Serving Institution and Minority Serving Institution locally, regionally and nationally.
9. The Affirmative Action Officer will appoint one member to all final search committees to increase diverse representation on the committee.

**Job Advancement:**

1. CSN will continue to post or announce job opportunities. CSN's Job Posting Policy System requires postings of all positions up to the Senior Management level.
2. All employees are actively encouraged to participate in facilities and College-sponsored social and recreational activities.
3. CSN will continue to use our formal employee evaluation program. The performance Appraisal is used for annual reviews for all employees.
4. Employees can choose training courses through the Center for Academic and Professional Excellence and include them in their career development plan.
5. Grant and Aid educational assistance is offered to employees who are interested in pursuing an undergraduate degree or an advance degree, with certain limitations.
6. The Office of Community Relations, Diversity and Multicultural Affairs to continue to implement institutional plans to increase inclusiveness to ensure CSN is a welcoming place for all faculty and staff.

**CHAPTER 10: INTERNAL AUDIT AND REPORTING**  
**41 C.F.R. § 60-2.17(d)**

Inherent in the AAP is the need for periodic self-assessment of problems encountered, corrective action taken, and progress made. Self-evaluation requires complex record keeping systems on applicants, employees, and components of the AAP itself. Periodic reports from supervisors, department managers, the Chief Human Resources Officer, and other relevant persons are required.

The objective of all record keeping systems to be implemented is to assess the results of past actions, trends, the appropriateness of goals and objectives, the appropriateness and relevancy of identified solutions to problems, and the adequacy of the Program as a whole. In addition, a further objective is to identify the proper corrective actions to be made to all components.

In order to fully achieve the objectives of such a record keeping system, the results of it must lead to follow-up through feedback to managers, supervisors, and staff, through reallocation of Resources, through modifications to plans and the record keeping system itself, through appropriate recognition of personal achievements as well as punitive actions for discriminatory acts. For any identified deficiencies, appropriate corrective action will be identified and implemented.

The records that are maintained are the basis for updating the affirmative action program, including revising the availability data and establishing annual numerical goals. The internal audit and reporting system is used as the basis for evaluating systemic, results-oriented programs and affirmative action efforts.

CSN auditing and reporting system periodically measures the effectiveness of its total affirmative action program. The Chief Human Resources Officer:

1. Monitors records of all personnel activity, including referrals, placements, transfers, promotions, terminations, and compensation, at all levels to ensure the nondiscriminatory policy is carried out;
2. Requires internal reporting on a scheduled basis as to the degree to which equal employment opportunity and organizational objectives are attained;
3. Reviews report results with all levels of management; and
4. Advises top management of program effectiveness and submit recommendations to improve unsatisfactory performance.

**CSN**

**2023 AFFIRMATIVE ACTION PROGRAM**

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

**FOR**

**July 1, 2022, to June 30, 2023**



## **PART II**

### **AAP FOR PROTECTED VETERANS AND INDIVIDUALS WITH DISABILITIES**

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**CHAPTER A: POLICY STATEMENT**  
**41 C.F.R. §§ 60-300.44(a); 60-741.44(a)**

It is the policy of CSN and my personal commitment that equal employment opportunity be provided in the employment and advancement for all persons regardless of race, religion, color, national origin, sex, age, sexual orientation/gender identity and status as a protected veteran or individual with a disability at all levels of employment, including the executive level. CSN does not and will not discriminate against any applicant or employee regardless of race, religion, color, national origin, sex, age, sexual orientation/gender identity and status as a protected veteran and/or individual with a disability to any position for which the applicant or employee is qualified. In addition, CSN is committed to a policy of taking affirmative action to employ and advance in employment qualified protected veteran employees and qualified employees with disabilities at all levels, including the executive level. Such affirmative action shall apply to all employment practices, including, but not limited to hiring, upgrading, demotion or transfer, recruitment, recruitment advertising, layoff or termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship and on-the-job training. Decisions related to personnel policies and practices shall be made on the basis of an individual's capacity to perform a particular job and the feasibility of any necessary job accommodation. CSN will make every effort to provide reasonable accommodations to any physical and mental limitations of individuals with disabilities and to disabled veterans.

Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion or discrimination because they have engaged in or may engage in any activity protected by state, federal or local anti-discrimination laws including the following activities:

1. Filing a complaint.
2. Assisting or participating in an investigation, compliance evaluation, hearing, or any other activity related to the administration of the affirmative action provisions of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended (VEVRAA) or any other Federal, state or local law requiring equal opportunity for disabled veterans, recently separated veterans, active wartime or campaign badge veterans, or Armed Forces service medal veterans or Section 503 of the Rehabilitation Act of 1973, as amended (Section 503) or any other federal, state or local law requiring equal opportunity for disabled persons;
3. Opposing any act or practice made unlawful by VEVRAA or its implementing regulations or any other federal, state or local law requiring equal opportunity for disabled veterans, recently separated veterans, active wartime or campaign badge veterans, or Armed Forces service medal veterans or section 503 or its implementing regulations or any other federal, state or local law requiring equal opportunity for disabled persons; or
4. Exercising any other right protected by VEVRAA or Section 503 or their implementing regulations.

Our obligations in this area stem from not only adherence to various state and federal regulations, but also from our commitment as an employer in this community to provide job opportunities to all persons regardless of race, religion, color, national origin, sex, age, sexual orientation/gender identity and status as a protected veteran or an individual with disability. CSN's EEO policy and affirmative action obligations include the full support from CSN President.

CSN will also continually design and implement audit and reporting systems that will measure the effectiveness and the compliance of the AAP, identify the need for remedial actions, determine if objectives were attained, and determine if opportunities to participate in College-sponsored activities were extended to all employees and applicants.

CSN is also committed to abiding with the Pay Transparency Nondiscrimination Provisions and therefore, will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. CSN's employees who have access to the compensation information of other employees or applicants as part of their essential job functions are informed and trained to not disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) a response to a formal complaint or charge; (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with CSN's legal duty to furnish the information.

If you have any questions regarding our equal employment opportunity, harassment policies or the complaint procedure, you may contact your local Human Resources representative. Parts of the Affirmative Action Program may be reviewed, as appropriate, by making an appointment with a local Human Resources representative.



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Dr. Federico Zaragoza  
College of Southern Nevada, President

Date: 11/22/2022

**CHAPTER B: REVIEW OF PERSONNEL PROCESSES**  
**41 C.F.R. §§ 60-300.44(b); 60-741.44(b)**

To ensure that all personnel activities are conducted in a job-related manner which provides and promotes equal employment opportunity for all known protected veterans and employees and applicants with disabilities, reviews are periodically made of the College's examination and selection methods to identify barriers to employment, training, and promotion.

1. CSN periodically conduct a review of its employment processes to ensure thorough and systematic consideration of the job qualifications of 1) known protected veteran applicants and employees; and 2) applicants and employees with disabilities for job vacancies filled either by external hiring or internal promotions/transfers, as well as for all training opportunities available. In order to determine whether an individual is qualified for a particular job, a close examination of the content of the job is made, as well as a review of the job qualifications of known protected veterans and individuals with disabilities, both applicants and employees. In determining the qualifications of a protected veteran, consideration is given only to that portion of the military record, including discharge papers, relevant to the job qualifications for which the veteran is being considered.
2. The College ensures that its personnel processes do not stereotype individuals with disabilities or protected veterans in a manner which limits their access to jobs for which they are qualified.
3. The College ensures that applicants and employees with disabilities have equal access to its personnel processes, including those implemented through information and communication technologies.
4. The College provides reasonable accommodations, unless such accommodations will cause undue hardship to the College, to applicants and employees with disabilities to ensure that equal employment opportunity are extended in the operation of its personnel processes.
5. The College ensures that information and communications systems are accessible to all employees and applicants with disabilities even in the absence of a specific request for accommodation.

**CHAPTER C: PHYSICAL AND MENTAL QUALIFICATIONS**  
**41 C.F.R. §§ 60-300.44(c); 60-741.44(c)**

To ensure that all physical and mental qualifications and requirements are job-related and promote equal employment opportunity for all known protected veterans and employees and applicants with qualified disabilities, reviews are periodically made of the College's physical and mental qualifications and requirements as they relate to employment, training, and promotion.

The College's physical and mental job requirements are reviewed to determine whether or not they are job-related and consistent with business necessity and safe performance on the job.

Schedule for Review: Any previously reviewed classification will be reviewed again if there is a change in working conditions which affects the job's physical or mental requirements (e.g., new requirements, new equipment, etc.)

**CHAPTER D: REASONABLE ACCOMMODATION TO PHYSICAL AND MENTAL  
LIMITATIONS**

**41 C.F.R §§ 60-300.44(d); 60-741.44(d)**

CSN will make every effort to provide reasonable accommodations to physical and mental limitations of applicants and employees with disabilities or who are disabled veterans unless it can demonstrate that the accommodations would impose an undue hardship on the operation of business. Such reasonable accommodations are implemented in the College's electronic and/or online application systems. The College ensures that qualified applicants and employees with disabilities, who are unable to fully utilize the system, are provided equal opportunities to apply and be considered for all jobs. CSN will confidentially review performance issues of employees with known disabilities to determine whether a reasonable accommodation is needed when: 1) the employee is having significant difficulty with job performance, and 2) it is reasonable to conclude that the problem is related to the known disability.

Employees may also contact the following at any time to formally request an accommodation:

Name: Kathy Eghoian  
Title: College of Southern Nevada, Benefits Coordinator  
Phone: (702) 651-7475  
Email: [Kathy.Eghoian@CSN.edu](mailto:Kathy.Eghoian@CSN.edu)

**CHAPTER E: HARASSMENT**  
**41 C.F.R. §§ 60-300.44(e); 60-741.44(e)**

CSN has developed and implemented a set of procedures to ensure that its employees with disabilities and protected veterans are not harassed due to those conditions. A copy of the sexual harassment policy, which includes a section prohibiting harassment of individuals with disabilities and/or protected veterans are available for distribution to new as well as to existing employees. A copy of the sexual harassment policy can be found at [https://archive.csn.edu/sites/default/files/documents/sexual\\_harassment\\_policy\\_2.pdf](https://archive.csn.edu/sites/default/files/documents/sexual_harassment_policy_2.pdf).

CSN ensures that all of its new supervisors receive at least two (2) hours of sexual harassment training within six (6) months of becoming a supervisor and at least once every two years.

**CHAPTER F: EXTERNAL DISSEMINATION OF POLICY, OUTREACH AND  
POSITIVE RECRUITMENT**  
**41 C.F.R. §§ 60-300.44(f); 60-741.44(f)**

Based upon the College's review of its personnel policies as described in Chapter B, the following activities will be implemented or continued to further enhance our affirmative action efforts. All activities are the responsibility of the Director of Employee Relations and AAO.

1. Inform all recruiting sources, in writing and orally, of the College's affirmative action policy for protected veterans and individuals with disabilities.
2. List with the State Employment Development Department all suitable job openings.

The exemptions for posting jobs are when positions are,

- (1) executive and top management positions,
- (2) positions that will be filled from within the contractor's organization,
- (3) and positions lasting three days or less.

This is an on-going activity. A listing of job opportunities reported to the local State Employment Service Delivery System is always kept current.

3. Send written notification of the College's affirmative action policy to all subcontractors, vendors, and suppliers requesting appropriate action on their part. This includes their obligation to annually file their EEO Reporting form and VETS 4212 form and, for employers with 50 or more employees and contracts of \$50,000 or more, their obligation to develop a written affirmative action program.
4. Conduct formal briefing sessions with representatives from recruiting sources. Include as part of the briefing sessions, facility tours, clear and concise explanations of current and future job openings, position descriptions, worker specifications, explanations of the College's selection process, and recruiting literature. Arrange for referral of applicants, follow up with sources, and feedback on disposition of applicants.
5. CSN will also grant leaves of absence to employees who participate in honor guards for the funeral of veterans.



**CHAPTER G: INTERNAL DISSEMINATION OF POLICY**  
**41 C.F.R. §§ 60-300.44(g); 60-741.44(g)**

In order to gain positive support and understanding for the affirmative action program for protected veterans and individuals with disabilities CSN will implement or continue to implement the following internal dissemination procedures, all of which are the responsibility of the Director of Employee Relations and AAO. The following policies and procedures are designed to foster support and understanding from CSN's executive staff, management, supervisors, and other employees in an effort to encourage all employees to take the necessary actions to aid CSN in meeting its obligations.

1. Conduct special meetings with executive, management, and supervisory personnel to explain the intent of the policy and individual responsibility for effective implementation, making clear the CSN President's attitude.
2. Schedule training sessions for all employees involved in recruiting, selection, promotion, and other related employment issues for protected veterans and individuals with disabilities.
3. Discuss the policy thoroughly in both employee orientation and management training programs.
4. Inform union officials of the College's policy, and request their cooperation.
5. Include non-discrimination clauses in all union agreements, and review all contractual provisions to ensure they are non-discriminatory.
6. Include articles on accomplishments of protected veterans and workers with disabilities in College publications.
- 9) When employees are featured in employee handbooks or similar publications for employees, include employees with disabilities.

**CHAPTER H: AUDIT AND REPORTING SYSTEM**  
**41 C.F.R. §§ 60-300.44(h); 60-741.44(h)**

CSN has developed and currently implements an audit and reporting system that addresses the following:

1. Measures the effectiveness of CSN's overall affirmative action program and whether the College is in compliance with specific obligations.
2. Indicates the need for remedial action. Any corrective actions will be the responsibility of the Director of Employee Relations and AAO.
3. Measures the degree to which CSN's objectives are being met.
4. Whether there are any undue hurdles for individuals with disabilities and protected veterans regarding College sponsored educational, training, recreational, and social activities. This will also include, but not limited, to the review of the on-line and electronic application system to determine their accessibility and ensuring that procedures to request for accommodations are prominently displayed and that individuals with disabilities can readily obtain the needed accommodation.

**CHAPTER I: RESPONSIBILITY FOR IMPLEMENTATION**  
**41 C.F.R. §§ 60-300.44(i); 60-741.44(i)**

As part of its efforts to ensure equal employment opportunity to protected veterans and individuals with disabilities, CSN has designated specific responsibilities to various staff to ensure the AAP focuses on all components of the employment system. To that end, the CSN President, Chief Human Resources Officer, Director of Employee Relations and AAO, and those employed as supervisors and managers have undertaken the responsibilities described below.

CSN President

The CSN President is responsible for providing top management support for the College's AAP. This person issues a memo annually to reaffirm the College's Equal Employment Opportunity Policy and to make known to all employees and applicants the commitment of Senior Management to EEO and affirmative action. Additional responsibilities include, but are not limited to:

1. Designating appropriate personnel with the responsibility for overseeing, administering, implementing, and monitoring the College's AAP. Ensuring that these personnel are identified in writing by name and job title.
2. Ensuring that designated personnel responsible for all AAP components are given the necessary authority and top management support and staffing to successfully implement their assigned responsibilities.
3. Imparting the personal direction that ensures total involvement and commitment to equal employment opportunity programs through CSN's AAP.

Chief Human Resources Officer

The Chief Human Resources Officer is responsible for overall supervision of the AAP. The Chief Human Resources Officer ensures, through the Director of Employee Relations and AAO and department managers and supervisors, that all relevant policies and procedures are adhered to. Successful implementation of this program is a basis for evaluating the Chief Human Resources Officer's effective work performance. The Chief Human Resources Officer's responsibilities include, but are not limited to, the following:

1. Presenting all needed recommendations and procedural changes to Senior Management concerning EEO and affirmative action and ensuring that Senior Management is kept informed of the College's compliance status.
2. Maintaining College-wide management support and cooperation for the College's AAP.
3. Collaborating with Senior Management on EEO and AAP issues.
4. Assisting line management in arriving at solutions to EEO/AA problems.

5. Reviewing results of audit and reporting systems to assess the effectiveness of the College's AA programs and to direct corrective actions where necessary.
6. Ensuring that the AAP is updated annually for all establishments.
7. Providing guidance to managers and supervisors in taking proper action to prevent employees from being harassed in any way, through one-on-one contact, training, and disciplinary action.
8. Providing guidance and direction to the Director of Employee Relations and AAO.
9. Reviewing the qualifications of all employees to ensure equitable opportunity, based on job-related employment practices, is given to all for transfers and promotions.
10. Conducting periodic audits of: 1) training programs and hiring and promotion patterns to remove impediments to the attainment of AAP goals and objectives, and 2) the College's sponsored educational, training, recreational, and social activities to ensure that all employees are encouraged to participate in accordance with policies on non-discrimination. Determine whether known protected veterans and employees with disabilities have had the opportunity to participate in all College-sponsored educational, training, recreation and social activities.
11. Ensuring the College's VETS 4212 form is filed annually with the Veterans' Employment and Training Service (VETS).

#### Director of Employee Relations and AAO

The Director of Employee Relations and AAO is responsible for ensuring that the directives of the CSN President and Chief Human Resources Officer are implemented. The Director of Employee Relations and AAO's duties include, but are not limited to, the following:

1. Providing direction to the College's employees, as necessary, to carry out all actions required to meet the College's equal employment opportunity and affirmative action commitments.
2. Reviewing all job descriptions and specifications to ensure they are free of discriminatory provisions and artificial barriers. Ensuring that all requirements are job-related, that they are realistic, and that they reflect the actual work requirements of the essential job duties.
3. Responsible for the design and effective implementation of the AAP at all establishments.
4. Developing, implementing, and maintaining audit and reporting systems to measure effectiveness of equal employment opportunity programs, including those that will

- a) Indicate need for remedial action,
  - b) Determine degree to which goals and objectives have been obtained.
5. Advising management in the modification and development of the College's policies to ensure the enhancement of equal employment opportunity for all employees and potential employees within existing equal employment opportunity guidelines.
  6. Identifying problem areas and establishing procedures, goals and objectives to solve these problems.
  7. CSN conducts periodic audits to ensure that all required posters and the equal employment opportunity policies and AAP are displayed properly. CSN also conducts audits to ensure that the Invitation to Self-Identify (pre and post offer) for protected veterans and individuals with disabilities, the College's equal employment opportunity, and AAP policies are being utilized appropriately and thoroughly communicated.
  8. Ensure that employees are re-surveyed regarding their disability status every five (5) years and send out reminders to employees, at least once during the five (5) year intervals, that they may voluntarily update their disability status at any time.
  9. Developing policy statements, affirmative action programs, internal and external communication techniques.
  10. Assisting line management in arriving at solutions to problems.
  11. Serving as the liaison between CSN and enforcement agencies.
  12. Serving as the liaison between CSN and organizations and community action groups for protected veterans and individuals with disabilities, in addition to ensuring that representatives are involved in community service programs of local organizations for protected veterans and individuals with disabilities.
  13. Keeping management informed of the latest developments in the equal employment opportunity area.
  14. Reviewing, reporting on, and updating the AAP annually in accordance with stated policy. Informing employees and applicants of significant changes.
  15. Working closely with the Chief Human Resources Officer and department managers and supervisors in coordinating the effective implementation of all identified affirmative actions.

16. Assisting in review and revision of all policies, procedures, and rules to ensure they are not in violation of federal or state laws and regulations.
17. Responsible for ensuring overall the College's compliance with the AAP.

### Managers and Supervisors

In their direct day-to-day contact with the College's employees, managers and supervisors have assumed certain responsibilities to help CSN ensure compliance with equal employment opportunity programs and effective implementation of the AAP. These include, but are not limited to the following:

1. Adhering to the College's equal employment opportunity policy.
2. Supporting and assisting the Chief Human Resources Officer and Director of Employee Relations and AAO in developing, maintaining, and successfully implementing the AAP.
3. Completing progress reports regarding the status of affirmative action programs.
4. Taking action to prevent harassment of employees placed through affirmative action efforts.
5. Assigning employees to significant jobs that might lead to greater personal growth and value, and counsel them with respect to what is needed for upward mobility within the employment structure.
6. Ensuring that all interviews, offers of employment and/or wage commitments are consistent with the College's policy.
7. Implementing the internal promotion and transfer of all employees under their supervision consistent with AAP goals and objectives.
8. Assisting in identifying problem areas and providing needed information for establishing and meeting department affirmative action goals and objectives.
9. Seeking and sharing information on feasible accommodations which have been or could be made for known disabilities.

**CHAPTER J: TRAINING**  
**41 C.F.R. §§ 60-300.44(j); 60-741.44(j)**

CSN trains all employees involved in any way with the recruitment, selection, promotion, disciplinary actions, training, and related processes of individuals with disabilities or protected veterans to ensure commitment to the College's stated affirmative action goals.

**CHAPTER K: DATA COLLECTION ANALYSIS**  
**41 C.F.R. §§ 60-300.44(k); 60-741.44(k)**

CSN has adopted the current national percentage of veterans in the civilian labor force of 6.4% as its hiring benchmark for protected veterans. CSN will update its hiring benchmark as new data is published and updated via the OFCCP's website. The 6.4% hiring benchmark is applied to each job group within CSN.

CSN also adopted the current national utilization goal of 7.0% for qualified individuals with disabilities. CSN will update its utilization goal as new data becomes available, updated and published. The 7.0% utilization goal is applied to each job group within CSN.

Goals and/or benchmarks do not require that CSN hire, promote, train, and/or retain a specified number of individuals with disabilities and/or protected veterans. These goals/benchmarks are not rigid and inflexible quotas which must be met, but are instead targets reasonably attainable by means of applying every good faith effort to make all aspects of the entire AAP work. A goal is a guidepost against which CSN, a community group, or a compliance agency can measure progress in remedying identified deficiencies in CSN 's workforce.

CSN has collected the required data and conducted studies to identify areas of opportunities in the employment of protected veterans and individuals with disabilities. CSN will continue to monitor and update these studies periodically during each AAP year. In each case where the hiring benchmark for protected veterans and/or the utilization goal for individuals with disabilities are not met, affirmative actions, as appropriate, will be taken consistent with the activities mentioned in Chapter F (External Dissemination of Policy and Outreach and Positive Recruitment) and measures described in Chapter H (Internal Audit and Reporting) of this AAP.

See the *Hiring Benchmark and Utilization Goals Analyses* unit (available in the HR Department).



**CHAPTER L: COMPENSATION**  
**41 C.F.R. §§ 60-300.21(i); 60-741.21(i)**

It is the policy of CSN that when offering employment or promotion to protected veterans or individuals with disabilities, the amount of compensation offered will not be reduced because of any disability income, pension, or other benefit the applicant or employee receives from another source.

CSN is also committed to abiding with the Pay Transparency Nondiscrimination Provisions. Employees or applicants who have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant will not be discharged or in any other manner be discriminated. Employees who have access to the compensation information of other employees or applicants as part of their essential job functions are informed and trained to not disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) a response to a formal complaint or charge; (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with CSN's legal duty to furnish the information.