



## Human Resources

### EEO Plan Revisions/Title 5 Changes

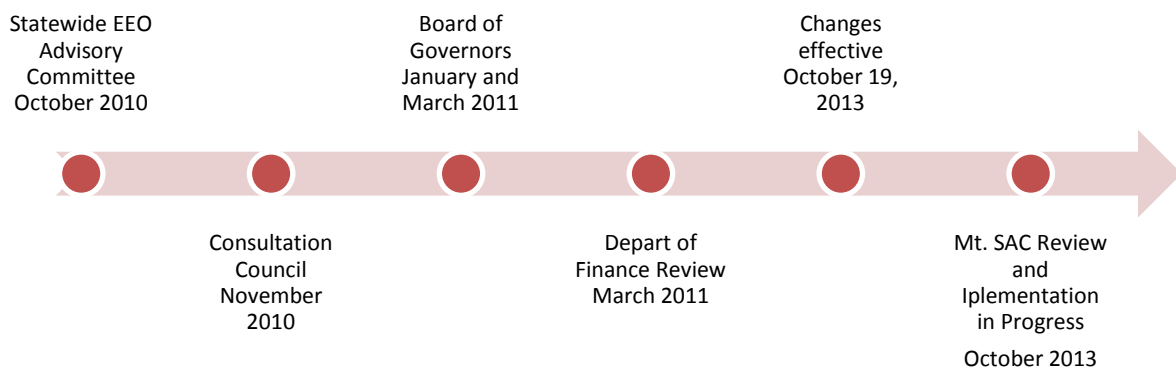
**Note: Section V. Updated June 2, 2014**

#### I. Background

In 2010, the Chief Human Resources Officers/Equal Employment Opportunity Directors (ACHRO/EEO) raised concerns with the CA Community Colleges Chancellor's Office about Title 5 EEO regulations. The specific concerns related to outdated terminology and methodologies in light of conflicting legislation (Prop 209). In 2011 the Board of Governors approved substantial revisions to EEO provisions contained in Title 5.

Since 2011, the proposed changes have been under review by the State Department due to the concern that the proposed changes could result in claims for reimbursement from Community College districts.

Timeline for recent changes to Title 5 regarding EEO:



#### II. Conceptual Overview

Previous model utilized methods which were statistically driven, punitive and reactive. The newly implemented methods take a much more proactive approach

and create a variety ways to promote diversity. The new EEO model looks at institutional behavior and shifts accountability to local agencies.

Old regulations	New regulations
Single required approach	District-designed strategies
Statistic driven	Behavior driven
Reactive	Proactive
Rigid	Flexible

### III. Key Changes in Title 5 Sections

Section	Description of Change(s)
53006-Local preferred criteria	Treated as an available tool. Must be used carefully. Criteria must be job related.
53021-Interim appointments	Up to 2 years. No application for extension is required beyond 1 year.
53023-Applicant pool certification	This process has been eliminated.
53024-Closing/re-opening recruitments	This process has been eliminated.
53024.1-Developing and maintaining institutional commitment to diversity.	Brand new. This section is truly the heart of the regulations.
53024.2-Accountability and corrective action	Brand new. Based on institutional conduct not statistics. The removal of the requirement to conduct pool certification does not relieve us of our responsibility to analyze data. We are expected to conduct longitudinal studies not just snapshot data.
53025-Persons with disabilities	Included in one consistent approach to monitored groups.

### IV. Specific Modifications Required in the Mt. SAC EEO Plan.

Note: Mt. SAC adopted the Chancellor's Office Model EEO Plan, so our changes are minimal as compared to other colleges. The Chancellor's Office has specifically identified the following Model Plan Components for revision.

Component	Changes Required
2-Definitions	Add new, edit or delete others.
5-Advisory Committee	Identify specific topics for training.
10-Analysis of workforce and pools	Edit
11-Analysis of underrepresentation	Delete. Note, this does not mean that

	the District will stop collecting and analyzing data.
12-Methods to address underrepresentation	Edit
13-Additonal steps	Requires significant editing to remove the prior reactive language and create proactive language. The District EEO plan is an account of what the we are COMMITTING to do. Remove the qualifier “may” to demonstrate that we understand and committed to recognizing the value of a diverse workforce.
15-Persons with disabilities	Edit to remove any language that creates special recruitment efforts. Persons with disabilities are to be included in global diversity recruitment.

#### V. Projected Review of Mt. SAC Hiring Practices and Procedures

Phase	Tasks	Projected Date
<b>Phase I</b>	<ul style="list-style-type: none"> <li>a. New Title 5 changes effective.</li> <li>b. CEDC to review Title 5 changes.</li> <li>c. CEDC to propose revisions to campus EEO Plan.</li> <li>d. Human Resources reviews and revises Draft EEO Plan in accordance with CEDC’s recommendations.</li> <li>e. President’s Cabinet review</li> <li>f. Review and input through participatory governance structure (e.g., PAC, Unions, AMAC)</li> </ul>	<ul style="list-style-type: none"> <li>October 2013</li> <li>December 2013</li> <li>April - June 2014</li> <li>July 2014</li> <li>August 2014</li> <li>August 2014-?</li> </ul>
<b>Phase II</b>	Review/Revise/Develop Recruitment and Hiring APs: <ul style="list-style-type: none"> <li>• Administrators/Managers</li> <li>• Full Time Faculty</li> <li>• Adjunct Faculty</li> <li>• Classified Staff</li> <li>• Non-Classified Short Term Temporary</li> </ul>	Fall 2014 – Spring 2015
<b>Phase III</b>	Notify all campus constituents regarding revised EEO related processes.	April 2014 – ongoing
<b>Phase IV</b>	Create annual training and review process.	April 2014- ongoing