

EDMONDS SCHOOL DISTRICT

Affirmative Action Plan

2016-2021

**Adopted by the Board of Directors
January 24, 2017**

Board of Directors

Carin Chase
Gary Noble
Susan Phillips
Ann McMurray
Diana White

Superintendent
Dr. Kristine McDuffy

I. INTRODUCTION

The Board of Directors of the Edmonds School District recognizes that an affirmative action plan is a sound employment practice which assists in achieving a diverse work force. Edmonds School District commits itself to a policy of non-discrimination for all qualified persons without regard to race, color, creed, national origin, religion, sex, age, marital status, sexual orientation, gender expression or identity, veteran or military status, or physical, mental and sensory disability except as may be necessary to meet a bona fide occupational qualification, and the use of a trained dog guide or service animal.

All personnel policies and practices related to employee selection, promotion, retention, staff development, and compensation will conform to the letter as well as the spirit of this Affirmative Action Plan and the Board of Director's policy on Equal Employment Opportunity.

The District has long had an Affirmative Action Plan, consistent with the requirements of law, with a primary focus on recruitment and selection of employees in alignment with the District's commitment to nondiscrimination and achieving a diverse work force. Attainment of and adherence to the Affirmative Action Plan is a primary responsibility of the Superintendent, administrators, managers and supervisors. Every employee will be expected to work toward its success. The District believes that a diverse work force strengthens all aspects of its operations.

II. COMMUNICATION OF AFFIRMATIVE ACTION PLAN

A. Internal Communication.

1. Copies of the District's policies regarding nondiscrimination and affirmative action are contained in the District's Policy and Procedure Manuals which are available on the District's website. The grievance procedures available to register complaints under these policies are also contained in these manuals.
2. These policies will also be discussed in new employee orientation.
3. Copies of the Affirmative Action Plan will be distributed to all members of the Board of Directors, to all administrators, supervisors at all District facilities, to employee associations, and posted on the District's website.

B. External Communication.

1. Publications from the District's Communications/Public Relations department and/or Human Resources Division will include notice and mention of the Plan from time to time, at least annually.
2. A statement of the District's commitment to equal employment opportunity is to be included in all District publications, employment announcements, recruitment material, vendor contracts, and other related District documents. All appropriate and interested

recruiting sources are to be informed of the District's policies regarding nondiscrimination.

3. The District will include its nondiscrimination statement in any publication that is disseminated and periodically to all students, parents, participants, applicants, employees or stakeholder. This includes district publications as well as building publications.

III. STAFF RESPONSIBILITY FOR IMPLEMENTATION AND EVALUATION

A. Affirmative Action Officer.

The Affirmative Action Officer has overall responsibility for monitoring and auditing this Plan and reports to the Superintendent and Board of Directors. The Affirmative Action Officer is:

Debby Carter, Executive Director
Human Resources Division
Edmonds School District No. 15
20420 68th Avenue West
Lynnwood, WA 98036-7400
(425) 431-7012

The Affirmative Action Officer is also charged with responding to any questions or complaints concerning the Americans with Disabilities Act, Section 504 of the Rehabilitation Act of 1973, or other employment discrimination laws.

B. All Employees.

All employees of the District are responsible for supporting this Plan and for conducting their duties in accordance with it. Anyone having questions or concerns about any matter related to equal employment issues is encouraged to contact the Affirmative Action Officer.

IV. UTILIZATION ANALYSIS

A. Development of Analysis.

The terms "utilization analysis" and "under-utilization" appearing in this Affirmative Action Plan (AAP) are used in the same sense in which these terms are used in regulations promulgated by the federal government relative to such plans. These terms have no independent legal or factual significance whatsoever. Many statistical comparisons herein involve the use of geographic areas and various sources of statistics. The use of such geographic areas and statistics is intended only for the purpose of implementing this Affirmative Action Plan and has no significance outside the context of this Plan, although, these statistics and areas have been selected and used in good faith and in an effort to be as useful as possible in the development of the Plan.

In order to determine whether goals are needed for an affirmative action program, it is first necessary to determine the percentage of females and ethnic/racial minorities available in the work force. This is done through an "availability analysis." The data used to calculate availability in each job group came from the 2010 census data for the Seattle-Bellevue-Tacoma Primary Metropolitan Statistical Area (PMSA) encompassing the greater Puget Sound region.

The availability analysis methodology used herein looks at the following factors that contribute to availability:

- Minority population
- Females searching for work
- Persons with requisite skills in the immediate area
- Persons with requisite skills in the recruitment area

The second step is to measure the District's current utilization (the percentage of females and minorities currently employed in each job group) against the statistically expected utilization rate (80% of availability rate). If current utilization is lower than the expected utilization, the District is "under-utilized" in a job group.

The ten job groups which were identified for tracking are: Certificated Administrators (including Principals, Certificated Managers, Executive Directors, Assistant Superintendents and Superintendent), Elementary & Secondary Teachers, Certificated Support Staff, Paraeducators, Bus Drivers, Custodians, Food Service, Office Personnel, Maintenance Trades, and Non-Certificated Professionals/Administrators (including Professional-Technical, Classified Managers, Executive Directors, and Administrative Assistants).

After determining the job groups and number of employees in each, job groups are statistically analyzed for both female and minority utilization.

B. Analysis of Utilization Statistics

The District has analyzed its October 2016 utilization of females and minorities relative to the statistically expected utilization, and this data is displayed in Appendices A and B.

The analysis indicates that females are not statistically under-utilized in any job category, so no goals are needed.

The District has compared its utilization of minorities in each job group between 2011 and 2016. During that time, the District increased overall utilization of minorities. Minority utilization increased from 7.69% to 12.57%. However, because of significant shifts in demographics, as reflected in the new census data, the District remains statistically underutilized in the following job groups: Certificated Administrators, Elementary and Secondary Teachers, Certificated Support Staff, Paraeducators, Bus Drivers, Custodians, Food Service, and Office Personnel. All of these groups except for Office Personnel were also under-utilized in the previous AAP. The Maintenance Trades and Non-Certificated/Professional/Administrators job groups maintained their acceptable utilization

status from the previous plan. A discussion of the job categories where the District is statistically under-utilized follows:

1. Certificated Administrators: Expected minority utilization is 14.39% and current utilization is 10.13%. Although under-utilization remains in this category, utilization of minorities has increased from 4.62% since 2011. The District will provide opportunities for promotion of all staff who are qualified for administrator vacancies and continue its outreach and recruitment efforts to attract a wide range of diverse applicants.
2. Elementary and Secondary Teachers: Expected minority utilization is 9.49% and current utilization is 8.84%. The District will review job announcements with equity in mind to continue its outreach and recruitment efforts to attract a wide range of diverse applicants, including efforts to ensure equal opportunity for diverse applicants in the hiring process. The District will also continue to establish partnerships with universities and community based organizations to attract student interns, support current employees with alternative routes to certification, and promote from within future teachers of color.
3. Certificated Support Staff. Expected minority utilization is 10.96% and current utilization is 8.88%. This job group includes school psychologists, speech language pathologists, and occupation therapists. These positions are generally difficult to fill and the District does not always have sufficient applicants to meet its hiring needs because it competes with other industries that pay more for employees in these occupations. The District will continue its outreach and recruitment efforts to attract a wide range of diverse applicants.
4. Paraeducators. Expected minority utilization is 16.96% and current utilization is 15.44%. Significant progress has been made since the previous AAP analysis, in which the utilization was 7.48%, however greater outreach needs to take place to ensure we are increasing our minority applicant pool. The District will continue its outreach and recruitment efforts to attract a wide range of diverse applicants.
5. Bus Drivers. Expected minority utilization is 21.60% and current utilization is 7.75%. Recruiting for positions in this category is generally difficult because all new hires undergo two weeks of training at minimum wage and begin as on-call relief drivers working a limited number of hours each week.
6. Custodians. Expected minority utilization is 34.48% and current utilization is 29.70%. Some progress has been made since the previous AAP analysis, in which the utilization was 21.21%. The District will continue its outreach and recruitment efforts to attract a wide range of diverse applicants.
7. Food Service. Expected minority utilization is 32.92% and current utilization is 26.74%. Progress has been made since the previous AAP analysis, in which the utilization was 14.15%. Because of the limited number of hours available and relatively low wages, recruiting has been generally difficult for this occupational category.

8. Office Personnel. Expected minority utilization is 14.96% and current utilization is 9.77%. In this job category, many positions are filled through promotion from existing staff. The District needs to broaden the applicant pool from which promotions are made, encourage internal applicants to pursue training that will improve their competitiveness for promotion, and generally increase access to these positions. The District will continue its outreach and recruitment efforts to attract a wide range of diverse candidates.

V. SUPPORTIVE SYSTEMS

To facilitate attainment of affirmative action goals, the Human Resource Division has responsibility for implementing and/or monitoring the following supportive activities:

A. Job Descriptions.

1. Job descriptions are reviewed and revised as necessary to reflect current duties, essential job functions, and critical job elements.
2. Professional job analysis techniques are utilized in the creation of new job descriptions and revision of existing job descriptions.

B. Recruitment.

1. Recruitment sources and procedures will ensure that qualified, protected-class applicants are identified and recruited.
2. Targeted mailing lists, publications, newspaper advertisements, and active participation with other public agencies on diversity and affirmative action issues are used to increase the diversity of the applicant population.
3. Participation in job fairs and visits to colleges and universities allow District representatives to make informational presentations about the District and encourage applicants to apply. Through these efforts, applicants are identified and interviewed, thereby casting a broad net of diverse applicants.
3. A computerized applicant tracking system has been implemented and is utilized to evaluate the effectiveness of the District's recruiting efforts.

C. Diversity Partnerships/Teacher Certification Support.

1. Continue and expand relationships with organizations and training programs which are a source for the recruitment of individuals from diverse backgrounds.
2. Encourage current employees to participate in the District's teacher preparation scholarship program to recruit and retain qualified diverse teacher applicants.

3. Human Resources Division staff will serve as resource on alternative routes to teacher certification.
- D. Employee Selection.
1. Selection instruments and methods will be based on essential job functions and critical job elements.
 2. As vacancies occur, recruiting and hiring authorities will be reminded of the District's commitments under the Affirmative Action Plan.
 3. The Human Resources Division will monitor all aspects of the employee selection process for participation of protected-class applicants in under-utilized categories.
- E. Orientation. All new employees receive an orientation. This program includes a general orientation to the District and a discussion of pertinent District policies, including equal employment opportunity and affirmative action.
- F. Evaluation.
1. All employees are evaluated annually using processes and criteria appropriate to each position.
 2. Career counseling is available through the employee's supervisor, the Human Resources Division, or the District's Employee Assistance Program.
- G. Program Support. The Human Resources Division trains and assists administrators, managers, and supervisors in developing appropriate departmental and building strategies to implement the District's Affirmative Action Plan.
- H. Complaint Procedure. A formal complaint procedure will be adopted by the District and is provided below.

VI. INTERNAL AUDIT AND REPORTING

The District has established the following internal audit and reporting system to monitor the Affirmative Action Plan:

- A. Job History Files. Job history files are maintained and retained for the legally specified time period and are available for reference. These files contain copies of the job announcement, copies of selection instruments, rating summaries, and relevant correspondence and notes. Applicant lists and individual applications are maintained in the electronic applicant tracking system.
- B. Applicant Flow Data. All applicants are asked to fill out an optional self-designation form within the electronic applicant tracking system and this data can be reviewed as needed.

- C. Reporting. Statistics on recruiting and utilization will be prepared and disseminated to administrators, managers and supervisors as appropriate.

VII. REDUCTION IN FORCE

Reductions in staff will be made in accordance with applicable law and with collective bargaining agreements currently in force. If a reduction in force is necessary, consistent with its legal and contractual obligations, the District will attempt to make reductions bearing in mind its affirmative action commitment and consistent with the requirements of law.

VIII. COMPLAINT PROCEDURE

These procedures have been developed for the resolution of equal employment opportunity and equal access complaints against the Edmonds School District, its employees, or its contract service vendors. To ensure fairness and consistency, they are to be used to address complaints covered by state and federal equal employment opportunity laws, including the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act of 1973, and/or the District's Affirmative Action Plan. No person shall be adversely affected in any way against because of the utilization of these procedures.

A Title IX/Affirmative Action Officer, or designee, shall investigate all noncompliance allegations of discrimination. Complaints covered by special education laws shall be processed under special education procedures.

PROCEDURE

LEVEL I: Informal Resolution

With regard to ADA and Section 504 matters, a distinction is to be made between a request for accommodation and a complaint. A request for accommodation should be submitted to the appropriate authority as noted in the District's ADA Self-Evaluation and Remediation Plan. If the designated authority is unavailable, the District's Communications/Public Relations Manager may be contacted for assistance. The parties should cooperate to resolve any issues of accommodation through an informal dialogue prior to implementing the formal procedures outlined in Level II below. A complaint is to be filed only in the event there is an allegation of noncompliance after a request for accommodation has been made.

LEVEL II: Formal Complaint

- A. Complaints shall:
1. Be in writing.
 2. Be signed by the complainant.

3. Set forth specific acts, conditions or circumstances alleged to be in violation of the District's obligations in regard to discrimination, inaccessibility, and/or failure to make accommodation.
- B. Upon receipt of a complaint, the Affirmative Action Officer, or designee, shall investigate the allegations set forth and shall coordinate reasonable procedures to effect a prompt resolution of the complaint. The investigation should be thorough and impartial and afford the complainant an opportunity to present witnesses and other evidence.
 - C. If a resolution is reached, the Affirmative Action Officer will write a formal memorandum of agreement, to be signed by all affected parties.
 - D. Upon completion of the investigation, but not later than thirty (30) days after filing the complaint, the Affirmative Action Officer will provide the complainant and the Superintendent with a full written report of the results of the investigation.
 - E. In cases where no mutually agreed upon resolution is reached, the Superintendent will respond in writing to the complainant within thirty (30) days of receipt of the investigative report
 - F. The response by the Superintendent shall state either: (1) that the District denies the allegations contained in the complaint; or (2) the nature of such reasonable corrective measures deemed necessary to eliminate any such act, condition, or circumstance within the District. The Superintendent's response must include notice of the complainant's right to appeal to the school board and identify where and to who the appeal should be filed.
 - G. Corrective measures deemed necessary shall be instituted as expeditiously as possible, but not later than 30 calendar days following the Superintendent's mailing of written response to the complainant, unless otherwise agreed to by the complainant.

LEVEL III: Appeal to the Board of Directors

- A. In the event a complainant remains aggrieved following a written response from the Superintendent, that complainant may appeal to the District's Board of Directors by filing a written notice of appeal with the Secretary of the School Board on or before the tenth (10th) calendar day following the date upon which the complainant received the Superintendent's written response.
- B. Upon receipt of the appeal, the Board of Directors shall schedule a hearing to commence on or before the twentieth (20th) calendar day following the filing of a written notice of appeal.
 1. Both parties shall be allowed to present such witnesses and testimony as the Board of Directors deems relevant and material.
 2. Unless otherwise agreed to by the complainant and the Superintendent, or for a good cause, the Board of Directors shall render a written decision on or before the tenth (10th) calendar day following the termination of the hearing and shall provide a copy to all parties involved.

The decision of the Board shall include notice of the complainant's right to appeal to the Superintendent of Public Instruction and identify where and with whom the appeal must be filed.

LEVEL IV: Appeal to the Superintendent of Public Instruction

In the event a complainant charging sex discrimination in violation of RCW 28A.640 or WAC 392-190 remains aggrieved with the decision of the Board of Directors, the complainant may appeal the Board's decision to the Superintendent of Public Instruction (SPI).

- A. A written notice of appeal must be received by the SPI on or before the twentieth (20th) calendar day following the date upon which the complainant received written notice of the Board of Directors' decision.
- B. The written notice of appeal must set forth:
 - 1. A concise statement of the original grievance and the portions of the Board of Directors' decision being appealed, and
 - 2. The suggested recommendations for resolution or remediation of the alleged grievance set forth in the original statement of complaint.

The complaint procedure outlined above does not prohibit the processing of grievances by an employee pursuant to grievance procedures established in applicable collective bargaining agreements.

2016-2021 AFFIRMATIVE ACTION PLAN

EDMONDS SCHOOL DISTRICT
5 YEAR PROGRESS OF MINORITY UTILIZATION
APPENDIX A

Job Groups	Total Employees	Total Employees	Total Minority %	
	2011	2016	2011	2016
Certificated Administrator*	65	79	4.62%	10.13%
Teacher (Elementary & Secondary)	1142	1188	5.60%	8.84%
Certificated Support	185	169	4.86%	8.88%
Paraeducators	468	531	7.48%	15.44%
Bus Drivers	113	129	4.42%	7.75%
Custodian	99	101	21.21%	29.70%
Food Service	106	86	14.15%	26.74%
Office Personnel	132	133	6.82%	9.77%
Maintenance Trades	42	50	21.43%	18.00%
Non-Cert/Prof/Admin**	132	152	15.91%	22.37%
Total	2484	2618	7.69%	12.57%

* “Certificated Administrator” includes Principals, Certificated Managers, Executive Directors, Assistant Superintendent & Superintendent.

** “Non-Cert/Prof/Admin” includes Professional-Technical, Classified Managers, Executive Directors, and Administrative Assistants.

2016-2021 AFFIRMATIVE ACTION PLAN

EDMONDS SCHOOL DISTRICT
OCTOBER 2016 DISTRICT UTILIZATION
APPENDIX B

Job Group	Total Employees	Total Females		Total Minority		Black		Asian		Hispanic		Pacific Islander		Multiracial		Native American	
		#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Certificated Administrator*	79	45	56.96%	8	10.13%	3	3.80%	3	3.80%	1	1.27%	0	0.00%	0	0.00%	1	1.27%
Teacher (Elementary & Secondary)	1188	887	74.66%	105	8.84%	11	0.93%	62	5.22%	17	1.43%	2	0.17%	6	0.51%	7	0.59%
Certificated Support	169	153	90.53%	15	8.88%	3	1.78%	7	4.14%	2	1.18%	0	0.00%	1	0.59%	2	1.18%
Paraeducators	531	467	87.95%	82	15.44%	27	5.08%	25	4.71%	17	3.20%	1	0.19%	5	0.94%	7	1.32%
Bus Drivers	129	66	51.16%	10	7.75%	1	0.78%	5	3.88%	3	2.33%	0	0.00%	0	0.00%	1	0.78%
Custodian	101	31	30.69%	30	29.70%	11	10.89%	11	10.89%	3	2.97%	1	0.99%	2	1.98%	2	1.98%
Food Service	86	83	96.51%	23	26.74%	1	1.16%	15	17.44%	5	5.81%	1	1.16%	0	0.00%	1	1.16%
Office Personnel	133	126	94.74%	13	9.77%	4	3.01%	3	2.26%	4	3.01%	0	0.00%	0	0.00%	2	1.50%
Maintenance Trades	50	2	4.00%	9	18.00%	1	2.00%	5	10.00%	2	4.00%	0	0.00%	0	0.00%	1	2.00%
Non-Cert/Prof/Admin**	152	99	65.13%	34	22.37%	5	3.29%	11	7.24%	11	7.24%	3	1.97%	1	0.66%	3	1.97%
Total	2618	1959	74.83%	329	12.57%	67	2.56%	147	5.61%	65	2.48%	8	0.31%	15	0.57%	27	1.03%

* "Certificated Administrator" includes Principals, Certificated Managers, Executive Directors, Assistant Superintendents and Superintendent.

** "Non-Cert/Prof/Admin" includes Professional-Technical, Classified Managers, Executive Directors, and Administrative Assistants

2016-2021 AFFIRMATIVE ACTION PLAN

EDMONDS SCHOOL DISTRICT
 DISTRICT UTILIZATION vs. STATISTICALLY EXPECTED UTILIZATION
 APPENDIX C

Job Group	Total Employees	Total Minority		Total Female		Availability		Expected Utilization		Underutilized?	
		#	%	#	%	Minority	Female	Minority	Female	Minority	Female
Certificated Administrator	79	8	10.13%	45	56.96%	17.99%	65.65%	14.39%	52.52%	Yes	No
Teacher (Elementary & Secondary)	1188	105	8.84%	887	74.66%	11.86%	66.19%	9.49%	52.95%	Yes	No
Certificated Support	169	15	8.88%	153	90.53%	13.70%	80.08%	10.96%	64.06%	Yes	No
Paraeducators	531	82	15.44%	467	87.95%	21.20%	89.90%	16.96%	71.92%	Yes	No
Bus Drivers	129	10	7.75%	66	51.16%	27.00%	40.10%	21.60%	35.28%	Yes	No
Custodian	101	30	29.70%	31	30.69%	43.10%	31.60%	34.48%	25.28%	Yes	No
Food Service	86	23	26.74%	83	96.51%	41.15%	69.35%	32.92%	55.48%	Yes	No
Office Personnel	133	13	9.77%	126	94.74%	18.70%	94.80%	14.96%	75.84%	Yes	No
Maintenance Trades	50	9	18.00%	2	4.00%	21.60%	4.52%	17.28%	3.62%	No	No
Non-Cert/Prof/Admin	152	34	22.37%	99	65.13%	21.96%	54.44%	17.57%	43.55%	No	No
Total	2618	329	12.57%	1959	74.83%						

* “Certificated Administrator” includes Principals, Certificated Managers, Executive Directors, Assistant Superintendents and Superintendent.

** “Non-Cert/Prof/Admin” includes Professional-Technical, Classified Managers, Executive Directors, and Administrative Assistants