# Affirmative Action Program for Minorities and Women

### **Blue Ridge Community & Technical College**

### Affirmative Action Plan for Minorities and Women

May 1, 2020 through April 30, 2021 Plan Year

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### **Blue Ridge Community & Technical College**

### AFFIRMATIVE ACTION PLAN FOR MINORITIES AND WOMEN

May 1, 2020 through April 30, 2021 PLAN YEAR

AAP Approve	ed by:	
**	Dr. Peter Checkovich	
	President	
AAP Prepared	d and Approved by:	
_	Morgan Gower	
	EEO Administrator	

### **Blue Ridge Community & Technical College**

### AFFIRMATIVE ACTION PLAN FOR MINORITIES AND WOMEN

May 1, 2020 through April 30, 2021 Plan Year

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#### Introduction

Blue Ridge Community & Technical College has prepared this Affirmative Action Plan (AAP) for the period of May 1, 2020 through April 30, 2021, reaffirming its commitment to the spirit and letter of affirmative action law, including those administered by the U. S. Department of Labor's Office of Federal Contract Compliance Programs (OFCCP). Through the implementation of this plan Blue Ridge CTC continues its efforts to comply with appropriate government regulations and to make the best possible use of personnel while contributing to the betterment of society and the community.

In developing this plan Blue Ridge CTC recognizes its duty to ensure equal employment opportunity. The following statement of policy reinforces that belief.

### **Reaffirming Commitment to Equal Employment Opportunity**

In setting forth this plan Blue Ridge CTC reaffirms its belief in equal employment opportunity for all employees and applicants for employment in all terms and conditions of employment.

Dr. Peter Checkovich, President of Blue Ridge CTC, designated Morgan Gower as the Equal Employment Opportunity Administrator (EEO Administrator). Morgan Gower oversees the plan development, modification, implementation, and reporting requirements and conducts management updates. The EEO Administrator also analyzes Blue Ridge CTC's selection process in order to further the principles of equal employment opportunity.

As part of Blue Ridge CTC's commitment to this overall process, it will seek to ensure affirmative action to provide equality of opportunity in all aspects of employment, and that all personnel activities, such as the recruitment, selection, training, compensation, benefits, discipline, promotion, transfer, layoff and termination processes remain free of illegal discrimination and harassment based age, ethnicity, disability status, national origin, race, color, religion, gender, sexual or gender orientation, marital status, genetics, and veteran status. Regular review by Blue Ridge CTC, as described in this AAP, helps to ensure compliance with this policy

# Internal Dissemination of EEO Policy 41 C.F.R. § 60-1.42

Blue Ridge CTC posts copies of the equal employment opportunity notices that comply with 41 C.F.R. § 60-1.42(a) in conspicuous places (including, where applicable, electronic websites) available to employees and applicants for employment. The following exemplify the methods and locations Blue Ridge CTC may use in its ongoing efforts to ensure continuing dissemination of its policy and plan, although Blue Ridge CTC may not always use each or any of the below methods, and it may use other methods not listed below:

- 1. Internal employee manuals contain the policy statement.
- 2. The policy statement is posted on bulletin boards accessible to employees.
- 3. Blue Ridge CTC references the policy and progress in its annual report, newspaper, magazine and other publications.
- 4. Orientation meetings for new employees and in-house employment-related training include references to Blue Ridge CTC's policy.
- 5. Blue Ridge CTC publications, if any, including those with photographs, generally feature individuals of diverse age, ethnicity, disability status, national origin, race, color, religion, gender, sexual or gender orientation, marital status, genetics, and veteran status where feasible.
- 6. Pertinent portions of Blue Ridge CTC's Affirmative Action Plan are available during regular business hours for inspection by employees and applicants for employment.

# External Dissemination of EEO Policy 41 C.F.R. § 60-1.41; 41 C.F.R. § 60-1.5

- 1. In solicitations or advertisements for employees placed by or on its behalf, Blue Ridge CTC complies with at least one of the following methods regarding the dissemination of its equal employment opportunity clause:
  - a. Blue Ridge CTC states expressly in the solicitations or advertising that all qualified applicants will receive consideration for employment without regard to age, ethnicity, disability status, national origin, race, color, religion, gender, sexual or gender orientation, marital status, genetics, or veteran status unless prohibited by law. 41 C.F.R.§ 1.41(a).
  - b. Blue Ridge CTC uses display or other advertising that includes an appropriate insignia prescribed by the Deputy Assistant Secretary, subject to the provisions of 18 U.S.C. § 701. 41 C.F.R.§ 1.41(b).

- c. Blue Ridge CTC uses a single advertisement, and the advertisement is grouped with other advertisements under a caption which clearly states that all employers in the group assure all qualified applicants equal consideration for employment without regard to age, ethnicity, disability status, national origin, race, color, religion, gender, sexual or gender orientation, marital status, genetics, or veteran status unless prohibited by law. 41 C.F.R.§ 1.41(c).
- d. Blue Ridge CTC uses a single advertisement in which appears in clearly-distinguishable type the phrase "an equal employment opportunity employer." 41 C.F.R.§ 1.41(d). When pictures are included in these media, where feasible, efforts will be made to include pictures of individuals of diverse age, ethnicity, disability status, national origin, race, color, religion, gender, sexual or gender orientation, marital status, genetics, or veteran status.
- 2. The following exemplify the methods and locations Blue Ridge CTC may use in its ongoing efforts to ensure continuing dissemination of its policy and plan, although Blue Ridge CTC may not always use all of the below methods, and it may use other methods not listed below:
  - a. Blue Ridge CTC notifies subcontractors, suppliers and vendors of the policy about both its obligations to equal employment opportunity and about Blue Ridge CTC's plan.
  - b. Blue Ridge CTC advises recruitment sources, minority and female organizations, community agencies, leaders, secondary schools and colleges annually in writing of its commitment to this policy and plan. Blue Ridge CTC informs these sources that job applicants will be treated fairly without regard to their age, ethnicity, disability status, national origin, race, color, religion, gender, sexual or gender orientation, marital status, genetics, or veteran status.
  - c. Blue Ridge CTC communicates with the state employment security office in writing regarding the policy.
  - d. Blue Ridge CTC advises prospective employees of the existence of the AAP and makes pertinent portions of it available upon request, during regular business hours.
- 3. In addition, Blue Ridge CTC incorporates by reference the equal employment opportunity and affirmative action clauses into each of its covered Government contracts and subcontracts, including Government bills of lading, transportation requests, contracts for deposit of Government funds, and contracts for issuing and paying U.S. savings bonds and notes and such other contracts and subcontracts as required by law, purchase orders, lease agreements, Government contracts, and other covered contracts (and modifications thereof if not included in the original contract) in accordance with 41. C.F.R. § 60-1.4 (a) (c) (unless exempted under 41 C.F.R. § 60-1.5).

# Establishment of Responsibility for Implementation of the Plan 41 C.F.R. § 60-2.17(a)

#### A. Identification and Responsibilities of EEO/AA Administrator

Overall responsibility for Blue Ridge CTC's plan rests with the EEO Administrator, Morgan Gower. Morgan Gower ensures that the plan complies with all applicable laws, orders and regulations, including but not limited to, Executive Orders 11246, 13496, and their progeny. Specifically, Morgan Gower or the designated representative's duties include:

- 1. Developing, maintaining and, where appropriate, modifying Blue Ridge CTC's plan to ensure compliance with the EEO/AA law.
- 2. Developing, and where appropriate, modifying procedures for effectively communicating the plan and its elements both internally and externally.
- 3. Advising management on EEO/AA progress, reporting potential EEO/AA problem areas, and assisting management in finding equitable solutions, where feasible, to any identifiable EEO/AA problem areas.
- 4. Evaluating the effectiveness of Blue Ridge CTC's plan on a regular basis, and reporting to management.
- 5. Designing, implementing, and overseeing audit and reporting systems that periodically measure the effectiveness of the total affirmative action program. 41 C.F.R. § 2.17 (d)(1)-(4), identifying need for remedial action, and determining the degree to which objectives have been achieved.
- 6. Acting as the representative and liaison with any government agencies regarding this plan.
- 7. Monitoring the policies and procedures with regard to terms and conditions of employment to attempt to ensure compliance with affirmative action obligations.
- 8. Auditing the content of Blue Ridge CTC's bulletin board, and electronic policies, as appropriate, to ensure compliance information is posted and up to date.
- 9. Keeping management up to date on the latest developments in the areas of EEO and affirmative action.
- 10. Serving as a liaison between Blue Ridge CTC and organizations, such as minority organizations and women's organizations.
- 11. Assisting in the investigation, handling and disposition of employee harassment and discrimination complaints.
- 12. Discussing EEO/AA policies with all personnel, including management, to ensure that Blue Ridge CTC's policies and the need for their support are understood at all levels.

- 13. Reviewing Blue Ridge CTC's AAP for qualified women and minorities with all managers and supervisors to ensure the policy is understood and followed in all personnel actions.
- 14. Conducting periodic reviews of offices to ensure compliance in the areas of proper display of posters and notices, comparable facilities for both sexes, and opportunity for participation in college-sponsored recreational, educational and social activities.
- 15. Auditing training programs, hiring, and promotion patterns.

#### **B.** Management Responsibilities

Line and upper management share responsibility for the plan, including but not limited to the following:

- 1. Assisting in auditing plan progress, including identifying problem areas, formulating solutions, establishing appropriate goals, and developing necessary training programs.
- 2. Reviewing the qualifications of applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner in hiring, promotion, transfers, and termination actions.
- 3. Making available career counseling, when appropriate.
- 4. Reviewing the job performance of each employee to assess whether personnel actions are justified based on the employee and his or her duties.
- 5. Reviewing position descriptions of the jobs in the manager's area or department to see that they adequately reflect the job to be performed.
- 6. Assisting subordinates and upper management in the prevention of harassment.

#### **Identification of Areas for Discussion**

#### 41 C.F.R. § 60-2.17(b)

Blue Ridge CTC's commitment to fully implement this policy and plan include periodic reviews of mission critical workforce factors in a number of ways, including performing an in-depth analysis of its total employment process to determine whether and where impediments to equal employment opportunity exist. These analyses include:

- 1. The workforce by organizational unit and job group of minority or female utilization and distribution;
- 2. Personnel activity to determine whether there are selection disparities;
- 3. Compensation systems to determine if there are gender-, race-, or ethnicity-based disparities;
- 4. Selection, recruitment, referral, and other personnel procedures to determine whether they result in employment or placement disparities of minorities or women; and,
- 5. Any other areas that might impact the success of the affirmative action program. 41 C.F.R. § 2.17 (b)(1)-(5), including, for example, Blue Ridge CTC's review of:
  - a. The workforce composition by race and sex to compare it to the availability of these groups;
  - b. Blue Ridge CTC's applicant flow compared to the availability for the protected groups;
  - c. A comparison of hires to applicants pertaining to minorities and women;
  - d. Compensation system(s) to determine whether there are gender-, race-, or ethnicity-based disparities;
  - e. Selection forms, such as applications for employment, to ensure they comply with federal and state employment laws;
  - f. Processes to ensure there are no artificially-created barriers or restrictive seniority provisions; and,
  - g. Training opportunities to ensure they are available to minorities and women without restrictions based on age, ethnicity, disability status, national origin, race, color, religion, gender, sexual or gender orientation, marital status, genetics, or veteran status.

Identification of problem areas are discussed in next section titled Narrative Discussion of Goals.

#### **Narrative Discussion of Goals**

The Blue Ridge Community & Technical College plan has 331 employees, including 27 minorities and 202 females. The following goals exist for minorities and/or women:

- Executive/Administrative/Managerial This group consists of 13 employees, of whom none are minorities and 9 are females. There is no need to set a placement goal at this time for minorities or females.
- Faculty This group consists of 30 employees, of whom 3 are minorities and 24 are females. There is no need to set a placement goal at this time for minorities or females.
- Instructors/Lecturers This group consists of 52 employees, of whom 2 are minorities and 26 are females. There is a goal of 16% for minorities and a goal of 65% for females.
- Adjunct Faculty This group consists of 153 employees, of whom 10 are minorities and 84 are females. There is no need to set a placement goal at this time for minorities or females.
- Professional Non-Faculty This group consists of 34 employees, of whom 3 are minorities and 29 are females. There is no need to set a placement goal at this time for minorities or females.
- Clerical and Secretarial This group consists of 16 employees, of whom 1 is a minority and 15 are females. There is no need to set a placement goal at this time for minorities or females.
- Technical and Paraprofessional This group consists of 6 employees, of whom none are minorities and 6 are females. There is no need to set a placement goal at this time for minorities or females.
- Skilled Crafts This group consists of 6 employees, of whom 1 is a minority and none are females. There is no need to set a placement goal at this time for minorities, but there is a goal of 61% for females.
- Service/Maintenance This group consists of 21 employees, of whom 7 are minorities and 9 are females. There is no need to set a placement goal at this time for minorities or females.

Blue Ridge CTC will use alternate recruitment sources when necessary to attract more qualified external applicants. In those instances where statistical adverse impact is indicated, Blue Ridge CTC will take action as outlined in the Action-Oriented Programs Section to monitor and eliminate any problem areas, as well as other similar actions.

# Development & Execution of Action-Oriented Programs 41 C.F.R. § 60-2.17(c)

Blue Ridge CTC has instituted action-oriented programs designed to eliminate any problem areas, should they exist, in accordance with § 60-2.17(b), and to help achieve specific affirmative action goals. Blue Ridge CTC also makes a good-faith effort to remove identified barriers, expand employment opportunities, and produce measurable results. These programs may include items such as:

- 1. Conducting periodic reviews of job descriptions attempting to ensure they accurately reflect jobrelated duties and responsibilities.
- 2. Annually reviewing job qualifications by department and job title for job-relatedness, and using job performance criteria.
- 3. Making job descriptions and qualifications available to recruiting sources and to all members of management involved in the recruiting, screening, selection, and promotion processes.
- 4. Making good-faith efforts to select the most qualified candidates regardless of age, ethnicity, disability status, national origin, race, color, religion, gender, sexual or gender orientation, marital status, genetics, or veteran status. Blue Ridge CTC recognizes the duty, should the need arise, to make good faith efforts to remedy any statistically significant underutilization of minorities and women. Accordingly, Blue Ridge CTC commits to evaluating the total selection process to ensure freedom from bias based on age, ethnicity, disability status, national origin, race, color, religion, gender, sexual or gender orientation, marital status, genetics, and veteran status through:
  - a. Reviewing the job applications and other pre-employment forms to ensure information requested is job-related;
  - b. Evaluating selection methods that may have a disparate impact to ensure that they are job-related and consistent with business necessity;
  - c. Providing assistance, such as training and guidance on proper interviewing techniques and EEO training, to employees, management, and supervisory staff, including, but not limited to, those who are involved in the recruitment, selection, discipline and other related processes, so that personnel actions remain neutral to age, ethnicity, disability status, national origin, race, color, religion, gender, sexual or gender orientation, marital status, genetics, and veteran status; and
  - d. Reviewing selection techniques and employment standards.
- 5. Blue Ridge CTC employs appropriate methods to attempt to improve recruitment and increase the flow of qualified minorities and women applicants in its recruiting process, including a number of the following actions:

- a. Including the phrase, "Equal Opportunity/Affirmative Action Employer" in printed employment advertisements;
- b. Placing help-wanted advertisements, when appropriate, in local minority news media and women's interest media;
- c. Disseminating information on job opportunities to organizations representing minorities, women, and employment development agencies when job opportunities occur;
- d. Encouraging all employees to refer qualified applicants;
- e. Actively recruiting in secondary schools, junior colleges, colleges and universities with predominantly minority or female enrollments where underutilization exists in such areas, and
- f. Requesting employment agencies to refer qualified minorities and women.
- g. Blue Ridge CTC considers using special employment programs designed to deal with underutilization. Business conditions and other feasibility matters remain the key factor in any decision to develop/implement such programs.
- h. Whenever feasible and appropriate, Blue Ridge CTC participates in job fairs, career days, youth-motivation programs and other programs that foster exposure for qualified minorities and women.
- i. Blue Ridge CTC encourages minorities and women to participate in college-sponsored activities and programs.
- j. Blue Ridge CTC utilizes various community organizations and schools as referral sources.
- 6. Blue Ridge CTC reviews promotion criteria and procedures so that job qualifications form the basis for the promotional decisions without regard to age, ethnicity, disability status, national origin, race, color, religion, gender, sexual or gender orientation, marital status, genetics, or veteran status. Blue Ridge CTC monitors promotion rates for minorities and women and, when necessary, may employ one or more of the following procedures:
  - a. Maintaining an inventory of current minority and women employees to determine special job-related talents, skills and experience.
  - b. Providing job training, job-related courses or certificate programs.
  - c. Reviewing work specifications and job qualifications to ensure job-relatedness.
  - d. Reviewing promotion decisions for possible impact on women or minorities.
  - e. Conducting career counseling, where appropriate, during performance evaluations.

- f. Informing employees about educational programs and other opportunities available to improve their employment prospects.
- g. Reviewing seniority practices for possible impact on women and minorities.
- h. Reviewing college-sponsored social and recreational activities to ensure nondiscriminatory participation and availability.
- i. Ensuring that all employees are given equal employment for promotion. This is achieved by:
  - 1. Generally posting or otherwise announcing most promotional opportunities.
  - 2. Offering counseling to assist employees in identifying promotional opportunities, training and educational programs to enhance promotions and opportunities for job rotation or transfer; and
  - 3. Evaluating job requirements for promotion.

# Internal Audit and Reporting System 41 C.F.R. § 60-2.17(d)

- 1. Morgan Gower, Blue Ridge CTC's EEO/AA Administrator, maintains an internal audit system to attempt to oversee Blue Ridge CTC's Affirmative Action Plan and assess progress. The EEO Administrator is responsible for ensuring that the formal AAP documents are developed and prepared and for the effective AAP implementation; however, responsibility is likewise vested with each department manager and supervisor, depending upon the specific responsibility. The audit system is designed and implemented to measure the effectiveness of the total affirmative action program [41 C.F.R. § 2.17 (d)(1)-(4)], including:
  - a. Monitoring records of all personnel activity, including: referrals, placements, transfers, promotions, terminations, and compensation, at all levels, to ensure the nondiscriminatory policy is carried out,
  - b. Requiring internal reporting on a scheduled basis as to the degree to which equal employment opportunity and organizational objectives are attained,
  - c. Reviewing reports at all levels of management; and
  - d. Advising top management of the program's effectiveness and submitting recommendations to improve unsatisfactory performance. 41 C.F.R. § 2.17 (d)(1)-(4).
- 2. Blue Ridge CTC reviews various employment decisions, such as job referrals, hiring decisions, transfers, promotions, and terminations. Blue Ridge CTC maintains summary data where necessary and feasible, and conducts regular reviews at least annually.

- 3. There is no "de facto" (in practice without being officially established) segregation. Further, Blue Ridge CTC ensures that facilities, as broadly defined in 41 C.F.R. § 60-1.8, provided for employees are provided in such a manner that segregation on the basis of age, ethnicity, disability status, national origin, race, color, religion, gender, sexual or gender orientation, marital status, genetics, or veteran status cannot result, provided that separate or single-user restrooms and necessary dressing or sleeping areas shall be provided to ensure privacy between the sexes.
- 4. Blue Ridge CTC complies with required records retention provisions set forth in 41 C.F.R.§60-1.12 and elsewhere in the applicable OFCCP regulations, and maintains a) employment applications (generally for two years); b) summary data of applicant flow by identifying, at least, total applicants, total minority applicants, and total female applicants, where necessary and feasible, and conducts regular reviews at least annually; c) applicant flow showing the name, race, sex, date of application, job title, interview status, and the action taken for all individuals applying for job opportunities, and the relevant applicant/hire decisions; d) summary data of external job offers and hires, promotions, resignations, terminations, and layoffs by job group and by sex and minority group identification; e) and records pertaining to its compensation system.
- 5. Provide needed reports to managers and supervisors regarding the results of the audit as well as Blue Ridge CTC's overall progress in the area of EEO/AA. Any recommended actions should be made as well. Reports shall be made to senior management on at least an annual basis.

# Guidelines for Prevention of Sex Discrimination 41 C.F.R. § 60-20.1 et seq.

Blue Ridge CTC supports the promotion and ensuring of equal employment opportunity of its employees and applicants without regard to sex, and endorses and complies with the following policy statements.

- 1. Blue Ridge CTC employment advertisements do not express a sex preference nor does Blue Ridge CTC place advertisements in columns designated "males" or "females", unless sex is a bona fide occupation obligation. 41 C.F.R. §60-20.2(a).
- 2. Employees of both sexes at Blue Ridge CTC shall have an equal opportunity to any available job that he or she is qualified to perform, unless sex is a bona fide occupation obligation. 41 C.F.R. §60-20.2.
- 3. Blue Ridge CTC maintains gender-neutral personnel policies that expressly indicate that there shall be no gender discrimination against employees. The terms and conditions of any written collective bargaining agreements shall not be inconsistent with these guidelines. 41 C.F.R. §60-20.3(a).
- 4. Blue Ridge CTC makes no distinction based upon sex in employment opportunities, wages, hours, or other conditions of employment. 41 C.F.R §60-20.3(c).

- 5. Blue Ridge CTC will not make any distinction between married and unmarried persons of one sex that is not made between married and unmarried persons of the opposite sex, or deny employment to women with young children unless it has the same exclusionary policies for men, or terminate the employment of an employee of one sex in a job classification upon reaching a certain age unless the same rule is applicable to members of the opposite sex. 41 C.F.R. § 60.20.3(d).
- 6. Blue Ridge CTC has policies and practices to ensure appropriate physical facilities to both sexes. 41 C.F.R. § 60-20.3(e).
- 7. Blue Ridge CTC will not deny a female employee the right to any job she is qualified to perform in reliance on a State "protective" law regarding, for example, prohibiting women from performing work such as a bartender, or for working at jobs requiring more than a certain number of hours or lifting above a certain weight. 41 C.F.R. § 60-20.3(f).
- 8. Blue Ridge CTC endorses and complies with the 1978 Pregnancy Discrimination Act, as it amended Title VII of the Civil Rights Act of 1964. Blue Ridge CTC applies any leave of absence policy uniformly, regardless of sex. 41 C.F.R. § 60-20.3(g).
- 9. Blue Ridge CTC must not specify any differences for male and female employees on the basis of sex in either mandatory or optional retirement age. 41 C.F.R. § 60-20.3(h).
- 10. Blue Ridge CTC's seniority lines and lists must not be based on sex. 41 C.F.R. § 60-20.4.
- 11. Blue Ridge CTC's wage schedules are not related to or based on the sex of an employee. 41 C.F.R. § 60-20.5(a). Further, Blue Ridge CTC does not discriminatorily restrict one sex to certain job classifications, and instead must take steps to make jobs available to all qualified employees in all classifications without regard to sex. 41 C.F.R. § 60-20.5(b).
- 12. When appropriate, Blue Ridge CTC makes affirmative efforts to increase the number and percentage of women in the workforce, including, but not limited to the following:
  - a. Blue Ridge CTC recruits women and encourages existing women employees to apply for positions historically labeled by society as "traditionally male".
  - b. Blue Ridge CTC guarantees equal, gender-neutral access to training and tuition reimbursement programs, including management training, and other types of workplace training programs.
  - c. Blue Ridge CTC informs management of its affirmative action responsibilities. 41 C.F.R § 60-20.6.

# Policy with Respect to Religion/National Origin 41 C.F.R. § 60-50.1 et seq.

Pursuant to the guidelines prohibiting discrimination on the basis of religion or national origin, 41 C.F.R. § 60-50.1, et seq., Blue Ridge CTC hereby reaffirms that it does not discriminate against employees, or applicants for employment, because of religion or national origin. Blue Ridge CTC takes affirmative action to seek to ensure that employees or applicants for employment are treated without regard to their religion or national origin in all aspects of the terms and conditions of employment, such as upgrading, demotion, transfer, recruitment, recruitment advertising, layoff, termination, rates of pay (or other forms of compensation), and selection for training.

Blue Ridge CTC has reviewed its employment practices and determined that its employees, including those who belong to religious or ethnic groups, have received fair consideration for job opportunities. Based upon its review, and depending upon the circumstances, Blue Ridge CTC will undertake appropriate actions, which may include one or more of the following activities:

- 1. Issuing a policy directive to employees reaffirming the Blue Ridge CTC's obligation to provide equal employment opportunity without regard to religion or national origin. This policy will be communicated in such a manner as to foster understanding, acceptance, and support among executives, managers, supervisors, and other employees, and to encourage such persons to take the necessary action to aid Blue Ridge CTC in meeting its obligations.
- 2. Developing internal procedures to seek to ensure that Blue Ridge CTC's obligation to provide equal employment opportunity, without regard to religion or national origin, is being fully implemented. Specifically, employment activities are reviewed by the EEO Administrator.
- 3. Informing management annually of its commitment to equal employment opportunity, without regard to religion or national origin.
- 4. Enlisting the assistance and support of recruitment sources for this commitment.

Blue Ridge CTC acknowledges its responsibility to make reasonable accommodations for the religious observances and practices of its existing or prospective employees under the terms of Title VII of the Civil Rights Act of 1964. An accommodation for religious purposes will be denied should Blue Ridge CTC determine that it would have to suffer undue hardship. During this accommodation evaluation, the following factors will continue to be considered by Blue Ridge CTC:

- 1. Business necessity;
- 2. Financial costs and expenses; and
- 3. Resulting personnel problems.

### **Organizational Profile**

Contractors and subcontractors are required to include in their AAPs an organizational profile of their workforce using either a "workforce analysis" or "organizational display" that provides detailed data reflecting staffing patterns within the establishment. 41 C.F.R. § 60-2.11. An organizational profile shows the staffing pattern within a contractor's establishment. This profile assists an employer in identifying where, in the workforce of its site which is the subject of this AAP, women or minorities are underrepresented or concentrated. A workforce analysis is used in this AAP, which lists each job title from the lowest paid to the highest paid within each department or similar organizational unit.

Plan Date: 05/01/2020 Blue Ridge Community & Technical College

AH

Title	EEO	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
Adjunct Lecturer	2	21	9	7	2	0	0	0	0	0	2
	2	21	12	12	0	0	0	0	0	0	۷
Summary of AH		21	9	7	2	0	0	0	0	0	2
		21	12	12	0	0	0	0	0	0	∠

Plan Date: 05/01/2020 Blue Ridge Community & Technical College

Allied Health

Title	EEO	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
ADMINISTRATIVE ASSISTANT	4	1	0	0	0	0	0	0	0	0	0
	4	Τ.	1	1	0	0	0	0	0	0	O
PROGRAM COORDINATOR	3	1	0	0	0	0	0	0	0	0	0
	3	Τ.	1	1	0	0	0	0	0	0	O
INSTRUCTOR/MEDICAL EXTERNSHIP COORDINATOR	2	1	0	0	0	0	0	0	0	0	0
	2	1	1	1	0	0	0	0	0	0	U
LECTURER	0	2	1	1	0	0	0	0	0	0	0
	2	2	1	1	0	0	0	0	0	0	0
LECTURER/EMS CLINICAL COORDINATOR		1	1	1	0	0	0	0	0	0	0
	2	1	0	0	0	0	0	0	0	0	0
LECTURER/HEALTH INFORMATION MANAGEMENT EXTERNSHIP			1	1	0	0	0	0	0	0	
COORDINATOR	2	1	0	0	0	0	0	0	0	0	0
INSTRUCTOR			1	1	0	0	0	0	0	0	
	2	2	1	1	0	0	0	0	0	0	0
LECTURER/EMS PROGRAM DIRECTOR			0	0	0	0	0	0	0	0	
	2	1	1	1	0	0	0	0	0	0	0
ASSISTANT PROFESSOR			2	1	0	1	0	0	0	0	_
	2	2	0	0	0	0	0	0	0	0	1
INSTRUCTOR/HEALTH INFORMATION MANAGEMENT PROGRAM			0	0	0	0	0	0	0	0	-
COORDINATOR	2	1	1	1	0	0	0	0	0	0	0
ASSOCIATE PROFESSOR/CHAIR ALLIED HEALTH SCIENCES DIVISION			1	1	0	0	0	0	0	0	
PROGRAM	2	1	0	0	0	0	0	0	0	0	0

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Allied Health

Title	EEO	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
PROFESSOR/PHYSICAL THERAPY ASSISTANT PROGRAM COORDINATOR	2	1	0	0	0	0	0	0	0	0	0
	۷	1	1	1	0	0	0	0	0	0	
PROFESSOR	2	1	1	1	0	0	0	0	0	0	0
	۷	1	0	0	0	0	0	0	0	0	U
Summary of Allied Health		1.6	8	7	0	1	0	0	0	0	1
		16	8	8	0	0	0	0	0	0	

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ENRL

Title	EEO	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
GRAPHIC DESIGNER	5	1	0	0	0	0	0	0	0	0	0
	3	Τ.	1	1	0	0	0	0	0	0	0
FINANCIAL AID ASSISTANT II	4	1	0	0	0	0	0	0	0	0	1
	1	Τ.	1	0	1	0	0	0	0	0	Τ.
RECORDS ASSISTANT I	4	1	0	0	0	0	0	0	0	0	0
	4	Τ.	1	1	0	0	0	0	0	0	0
ADMINISTRATIVE SECRETARY	4	1	0	0	0	0	0	0	0	0	0
	4	Τ.	1	1	0	0	0	0	0	0	0
PROGRAM ASSISTANT II	4	1	0	0	0	0	0	0	0	0	0
	1	Τ.	1	1	0	0	0	0	0	0	0
RECORDS ASSISTANT II	4	2	0	0	0	0	0	0	0	0	0
	1	۷	2	2	0	0	0	0	0	0	0
PROGRAM ASSISTANT I	4	1	0	0	0	0	0	0	0	0	0
	1	Τ.	1	1	0	0	0	0	0	0	0
ADMISSION COUNSELOR	3	2	0	0	0	0	0	0	0	0	0
	J		2	2	0	0	0	0	0	0	0
EDUCATION COUNSELOR	3	1	0	0	0	0	0	0	0	0	0
	3	Τ.	1	1	0	0	0	0	0	0	0
STUDENT DEVELOPMENT SPECIALIST	3	1	0	0	0	0	0	0	0	0	0
	J	т	1	1	0	0	0	0	0	0	0
STUDENT DEVELOPMENT COORDINATOR	3	1	0	0	0	0	0	0	0	0	0
	3	Τ.	1	1	0	0	0	0	0	0	U

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ENRL

Title	EEO	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
TESTING COORDINATOR	3	1	0	0	0	0	0	0	0	0	0
	3	Τ.	1	1	0	0	0	0	0	0	O
OFFICE ADMINISTRATOR	3	1	0	0	0	0	0	0	0	0	0
	3	Τ	1	1	0	0	0	0	0	0	O
FINANCIAL AID COUNSELOR	3	2	0	0	0	0	0	0	0	0	0
	3	۷	2	2	0	0	0	0	0	0	0
FINANCIAL AID COUNSELOR - SR	3	1	0	0	0	0	0	0	0	0	1
	3	1	1	0	0	1	0	0	0	0	1
VETERAN EDUCATION COORDINATOR	3	1	0	0	0	0	0	0	0	0	0
	3	1	1	1	0	0	0	0	0	0	O
ASSOCIATE PROFESSOR/COORDINATOR OF MARKETING/DIRECTOR OF	3	1	0	0	0	0	0	0	0	0	0
STUDENT SERVICES	3	Т	1	1	0	0	0	0	0	0	O
STUDENT RECORDS ASSISTANT	2	1	0	0	0	0	0	0	0	0	1
	2	1	1	0	1	0	0	0	0	0	1
DIRECTOR OF FINANCIAL AID	1	1	0	0	0	0	0	0	0	0	0
	1	1	1	1	0	0	0	0	0	0	O
PROFESSOR/REGISTRAR	1	1	0	0	0	0	0	0	0	0	0
	1	Т	1	1	0	0	0	0	0	0	O
ASSOCIATE DEAN/STUDENTS	1	1	0	0	0	0	0	0	0	0	0
	1	Ţ	1	1	0	0	0	0	0	0	U
ASSISTANT PROFESSOR/VICE PRESIDENT OF ENROLLMENT	1	1	0	0	0	0	0	0	0	0	0
MANAGEMENT	1	Τ	1	1	0	0	0	0	0	0	U

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ENRL											
Title	EEO	Total	Male Female	White	Black	Hispanio	Asian	Native Hawaiiar	Indian	Two or More	Minority
Summary of ENRL		25	0	0	0	0	0	0	0	0	3

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ENROL

Title	EEO	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
CAREER SERVICES OUTREACH & PLACEMENT SPECIALIST	2	1	0	0	0	0	0	0	0	0	1
	3		1	0	0	1	0	0	0	0	1
Summary of ENROL		1	0	0	0	0	0	0	0	0	1
			1	0	0	1	0	0	0	0	

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*FACILITIES* 

Title	EEO	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
PART-TIME CAMPUS SERVICE WORKER	7	1	0	0	0	0	0	0	0	0	1
	,	1	1	0	1	0	0	0	0	0	1
CAMPUS SERVICE WORKER	7	5	1	0	1	0	0	0	0	0	4
	,	J	4	1	1	1	1	0	0	0	4
SECURITY GUARD	7	1	0	0	0	0	0	0	0	0	0
	,	1	1	1	0	0	0	0	0	0	0
PART-TIME SECURITY GUARD	7	1	1	0	1	0	0	0	0	0	1
	,	1	0	0	0	0	0	0	0	0	Τ.
CAMPUS MAINTENANCE SPECIALIST	7	1	1	1	0	0	0	0	0	0	0
	,	Τ	0	0	0	0	0	0	0	0	O
MANAGER PHYSICAL PLANT 1	7	1	1	1	0	0	0	0	0	0	0
	,	1	0	0	0	0	0	0	0	0	0
Summary of FACILITIES		10	4	2	2	0	0	0	0	0	6
		10	6	2	2	1	1	0	0	0	O

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F	N	ΙΑ	Ν	CE
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Title	EEO	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
PURCHASING ASSISTANT I	5	1	0	0	0	0	0	0	0	0	0
	3	Τ	1	1	0	0	0	0	0	0	0
A/R ACCOUNTING CLERK III	5	1	0	0	0	0	0	0	0	0	0
	J	Τ	1	1	0	0	0	0	0	0	0
MANAGER A/P	5	1	0	0	0	0	0	0	0	0	0
	3	Τ	1	1	0	0	0	0	0	0	0
PART-TIME CASHIER	4	2	0	0	0	0	0	0	0	0	0
	Ŧ	۷	2	2	0	0	0	0	0	0	U
ACCOUNTING ASSISTANT I	4	1	0	0	0	0	0	0	0	0	0
	1	Τ.	1	1	0	0	0	0	0	0	0
RECEIVING/INVENTORY CONTROL ASSISTANT	4	1	1	1	0	0	0	0	0	0	0
	1		0	0	0	0	0	0	0	0	0
A/R SUPERVISOR	3	1	0	0	0	0	0	0	0	0	0
	J	т	1	1	0	0	0	0	0	0	O
PROCUREMENT & PURCHASING CARD MANAGER	3	1	1	1	0	0	0	0	0	0	0
	ű		0	0	0	0	0	0	0	0	0
STAFFACCOUNTANT	3	1	0	0	0	0	0	0	0	0	0
	J		1	1	0	0	0	0	0	0	0
ACCOUNTANT	3	1	1	0	1	0	0	0	0	0	1
	3		0	0	0	0	0	0	0	0	
ACCOUNTANT SR	3	1	0	0	0	0	0	0	0	0	0
	3	Τ.	1	1	0	0	0	0	0	0	U

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FINANCE											
Title	EEO	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
MANAGER OF ACCOUNTING	3	1	0	0	0	0	0	0	0	0	0
	3	Т	1	1	0	0	0	0	0	0	0
COMPTROLLER	1	1	0	0	0	0	0	0	0	0	0
	1	Т	1	1	0	0	0	0	0	0	0
Summary of FINANCE	•	14	3	2	1	0	0	0	0	0	1
		1 <del>4</del>									

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HR

Title	EEO	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
HUMAN RESOURCES ASSISTANT III	5	1	0	0	0	0	0	0	0	0	0
	3	<sup>-</sup>	1	1	0	0	0	0	0	0	O
ADMINISTRATIVE SECRETARY SR	4	1	0	0	0	0	0	0	0	0	0
	7	1	1	1	0	0	0	0	0	0	0
HUMAN RESOURCES REPRESENTATIVE	3	1	0	0	0	0	0	0	0	0	<b>C</b>
	3	1	1	1	0	0	0	0	0	0	O
TALENT ACQUISITION & DEVELOMENT COORDINATOR	3	1	0	0	0	0	0	0	0	0	0
	3	1	1	1	0	0	0	0	0	0	O
DIRECTOR OF HUMAN RESOURCES	1	1	0	0	0	0	0	0	0	0	0
	1	1	1	1	0	0	0	0	0	0	O
Summary of HR		5	0	0	0	0	0	0	0	0	0
		3	5	5	0	0	0	0	0	0	U

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IT

Title	EEO	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
INFORMATION TECHNOLOGY ASSISTANT	6	2	2	2	0	0	0	0	0	0	0
	0		0	0	0	0	0	0	0	0	O
INFORMATION TECHNOLOGY CONSULTANT	3	2	1	1	0	0	0	0	0	0	0
	3	2	1	1	0	0	0	0	0	0	U
APPLICATION SYSTEM ANALYST PROGRAMMER SR		1	1	1	0	0	0	0	0	0	0
	3		0	0	0	0	0	0	0	0	U
VICE PRESIDENT OF INFORMATION TECHNOLOGY	1	1	1	1	0	0	0	0	0	0	0
	1		0	0	0	0	0	0	0	0	U
Summary of IT		6	5	5	0	0	0	0	0	0	0
		6	1	1	0	0	0	0	0	0	U

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NURS

Title	EEO	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
ADMINISTRATIVE SECRETARY SR	4	1	0	0	0	0	0	0	0	0	0
	7		1	1	0	0	0	0	0	0	O
Adjunct Lecturer	2	10	1	1	0	0	0	0	0	0	1
	2	10	9	8	1	0	0	0	0	0	1
ASSISTANT PROFESSOR	2	2 2	0	0	0	0	0	0	0	0	0
	2	۷	2	2	0	0	0	0	0	0	0
LECTURER	2	3	0	0	0	0	0	0	0	0	1
	2	7	3	2	1	0	0	0	0	0	1
ASSISTANT PROFESSOR/DIRECTOR OF NURSING	2	1	0	0	0	0	0	0	0	0	0
	2	1	1	1	0	0	0	0	0	0	O
Summary of NURS		17	1	1	0	0	0	0	0	0	2
		1 /	16	14	2	0	0	0	0	0	۷

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PRESIDENTS OFFICE

Title	EEO	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
EXECUTIVE ASSISTANT TO THE PRESIDENT/BTG WIB COORDINATOR	3	1	0	0	0	0	0	0	0	0	)
	3	1	1	1	0	0	0	0	0	0	U
PROGRAM COORDINATOR - SENIOR	3	1	1	1	0	0	0	0	0	0	0
	3		0	0	0	0	0	0	0	0	U
PRESIDENT	1	1	1,	1	0	0	0	0	0	0	0
	1		0	0	0	0	0	0	0	0	U
Summary of PRESIDENTS OFFICE		2	2	2	0	0	0	0	0	0	0
		3	1	1	0	0	0	0	0	0	U

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PS&UT

Title	EEO	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
E-LEARNING HELP DESK ASSOCIATE	3	1	0	0	0	0	0	0	0	0	0
	3		1	1	0	0	0	0	0	0	U
LECTURER	2	1	1	1	0	0	0	0	0	0	0
	۷	Τ.	0	0	0	0	0	0	0	0	U
INSTRUCTOR	2	2	1	1	0	0	0	0	0	0	0
	۷	۷	1	1	0	0	0	0	0	0	U
ASSISTANT PROFESSOR/LEGAL STUDIES	2	1	0	0	0	0	0	0	0	0	0
	۷	1	1	1	0	0	0	0	0	0	U
LECTURER/CRIMINAL JUSTICE PROGRAM COORDINATOR	2	1	1	1	0	0	0	0	0	0	0
	۷	1	0	0	0	0	0	0	0	0	U
INSTRUCTOR/HUMAN SERVICES PROGRAM COORDINATOR	2	1	0	0	0	0	0	0	0	0	0
	۷	Τ.	1	1	0	0	0	0	0	0	U
INSTRUCTOR/SOCIAL SCIENCES PROGRAM COORDINATOR	2	1	0	0	0	0	0	0	0	0	0
	۷		1	1	0	0	0	0	0	0	O
INSTRUCTOR/EDUCATION PROGRAM COORDINATOR	2	1	1	1	0	0	0	0	0	0	0
	٢		0	0	0	0	0	0	0	0	U
ASSISTANT PROFESSOR/INSTRUCTIONAL TECHNOLOGIST	2	1	0	0	0	0	0	0	0	0	0
	۷	Τ.	1	1	0	0	0	0	0	0	U
ASSISTANT PROFESSOR/ACADIC PROGRAM SPECIALIST	2	1	0	0	0	0	0	0	0	0	0
	۷	1	1	1	0	0	0	0	0	0	U
INSTRUCTOR/E-LEARN ADMINISTRATOR	2	1	0	0	0	0	0	0	0	0	0
			1	1	0	0	0	0	0	0	0

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PS&UT

Title	EEO	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
ASSISTANT PROFESSOR/COMPUTER APPLICATIONS COORDINATOR	2	1	0	0	0	0	0	0	0	0	1
	2	Τ.	1	0	1	0	0	0	0	0	1
ASSISTANT PROFESSOR/DEVELOPMENTAL ENGLISH	2	1	0	0	0	0	0	0	0	0	0
	2	Τ	1	1	0	0	0	0	0	0	U
ASSISTANT PROFESSOR/PROGRAM COORDINATOR	0	1	1	1	0	0	0	0	0	0	0
	2	1	0	0	0	0	0	0	0	0	0
ASSISTANT PROFESSOR /ASSOCIATE DEAN	0	1	0	0	0	0	0	0	0	0	0
	2	1	1	1	0	0	0	0	0	0	0
ASSOCIATE PROFESSOR/Director OF PRIOR LEARNING		1	0	0	0	0	0	0	0	0	0
	2	1	1	1	0	0	0	0	0	0	0
ASSISTANT PROFESSOR		1	1	1	0	0	0	0	0	0	0
	2	1	0	0	0	0	0	0	0	0	0
ASSOCIATE PROFESSOR/ASSOCIATE DEAN OF HUMANITIES	0	1	0	0	0	0	0	0	0	0	0
	2	Τ	1	1	0	0	0	0	0	0	0
ASSISTANT PROFESSOR/ASSOCIATE DEAN OF INFORMATION	0	1	0	0	0	0	0	0	0	0	0
TECHNOLOGY & MATH	2	Τ	1	1	0	0	0	0	0	0	U
ASSOCIATE PROFESSOR/CONTENT SPECIALIST		1	0	0	0	0	0	0	0	0	0
	2	1	1	1	0	0	0	0	0	0	0
ASSOCIATE PROFESSOR/DEAN OF PSUT		1	0	0	0	0	0	0	0	0	^
	2	1	1	1	0	0	0	0	0	0	0
ASSOCIATE PROFESSOR		1	0	0	0	0	0	0	0	0	^
	2	1	1	1	0	0	0	0	0	0	0

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PS&UT

Title	EEO	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
PROFESSOR/LIBERAL ARTS COORDINATOR	2	1	0	0	0	0	0	0	0	0	0
	2		1	1	0	0	0	0	0	0	O
PROFESSOR/ CHIEF FINANCIAL AND ADMINISTRATIVE	1	1	1	1	0	0	0	0	0	0	0
OFFICER/VICE PRESIDENT OF PSU	1	Τ	0	0	0	0	0	0	0	0	U
Summary of PS&UT		25	7	7	0	0	0	0	0	0	1
		23	18	17	1	0	0	0	0	0	

<b>PSUT</b>	
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Title	EEO	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
Adjunct Lecturer	2	63	25	23	1	0	1	0	0	0	0
	2	63	38	37	1	0	0	0	0	0	3
Summary of PSUT		63	25	23	1	0	1	0	0	0	2
		63	38	37	1	0	0	0	0	0	3

SECU	RI	Τ	Υ
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Title	EEO	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
SECURITY GUARD	7	6	4	4	0	0	0	0	0	0	)
	,	Ø	2	2	0	0	0	0	0	0	O
DIRECTOR OF PUBLIC SAFTEY	7	1	1	1	0	0	0	0	0	0	0
	,	1	0	0	0	0	0	0	0	0	O
Summary of SECURITY		7	5	5	0	0	0	0	0	0	0
		1	2	2	0	0	0	0	0	0	U

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Title	EEO	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
PART-TIME SECURITY GUARD	7	2	2	2	0	0	0	0	0	0	0
	,	۷	0	0	0	0	0	0	0	0	O .
SECURITY GUARD	7	1	1	1	0	0	0	0	0	0	0
	,		0	0	0	0	0	0	0	0	U
CAMPUS SERVICE WORKER	7	1	0	0	0	0	0	0	0	0	1
	,	Τ	1	0	0	0	1	0	0	0	Τ
LAB ASSISTANT II	6	2	2	1	0	1	0	0	0	0	1
	0	۷	0	0	0	0	0	0	0	0	1
PART-TIME LAB ASSISTANT	6	2	2	2	0	0	0	0	0	0	0
	0	۷	0	0	0	0	0	0	0	0	U
PART-TIME PROGRAM ASSISTANT	5	1	0	0	0	0	0	0	0	0	0
	3	Τ	1	1	0	0	0	0	0	0	U
PROGRAM ASSISTANT II	4	1	0	0	0	0	0	0	0	0	0
	4	Τ	1	1	0	0	0	0	0	0	U
PROJECT COORDINATOR	4	1	0	0	0	0	0	0	0	0	0
	4	Τ	1	1	0	0	0	0	0	0	U
PART-TIME PROGRAM MANAGER	3	1	0	0	0	0	0	0	0	0	0
	3	1	1	1	0	0	0	0	0	0	U
INSTRUCTOR/PROGRAM COORDINATOR/FOUNDATION ASSISTANT	2	1	0	0	0	0	0	0	0	0	0
	3	Ţ	1	1	0	0	0	0	0	0	U
LECTURER/INTERNSHIP PLACEMENT & ALUMNI OUTREACH	2	1	0	0	0	0	0	0	0	0	0
COORDINATOR	3	1	1	1	0	0	0	0	0	0	0

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Title	EEO	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
BUSINESS OPERATIONS ANALYST	3	1	0	0	0	0	0	0	0	0	0
	9	Τ	1	1	0	0	0	0	0	0	0
DIRECTOR OF CUSTOMIZED TRAINING	3	1	0	0	0	0	0	0	0	0	0
	3		1	1	0	0	0	0	0	0	0
FOUNDATION DIRECTOR/ASSISTANT DIRECTOR WORKFORCE & ENGINEERING TECHNOLOGIES	3	1	0	0	0	0	0	0	0	0	0
ENGINEERING TECHNOLOGIES	J		1	1	0	0	0	0	0	0	<u> </u>
Adjunct Lecturer	2	59	34	31	2	0	1	0	0	0	4
			25	24	1	0	0	0	0	0	
INSTRUCTOR/WORKFORCE PROGRAMS INSTRUCTIONAL SPECIALIST	2	1	0	0	0	0	0	0	0	0	0
		_	1	1	0	0	0	0	0	0	-
INSTRUCTOR/INSTRUCTIONAL SPECIALIST	2	1	0	0	0	0	0	0	0	0	0
		_	1	1	0	0	0	0	0	0	
INSTRUCTOR/ SERVERY SHIFT SUPERVISOR	2	1	1	1	0	0	0	0	0	0	0
		_	0	0	0	0	0	0	0	0	-
LECTURER/INSTRUCTIONAL SPECIALIST	2	2	1	1	0	0	0	0	0	0	0
			1	1	0	0	0	0	0	0	_
ASSISTANT PROFESSOR/MATH SKILLS	2	1	0	0	0	0	0	0	0	0	0
			1	1	0	0	0	0	0	0	-
LECTURER	2	9	6	6	0	0	0	0	0	0	0
			3	3	0	0	0	0	0	0	
LECTURER/EARLY CHILDHOOD PROGRAM COORDINATOR	2	1	0	0	0	0	0	0	0	0	0
			1	1	0	0	0	0	0	0	

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Title	EEO	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
LECTURER/ENVIRONMENTAL TECHNICIAN PROGRAM COORDINATOR	2	1	1	1	0	0	0	0	0	0	0
	۷		0	0	0	0	0	0	0	0	U
ASSISTANT PROFESSOR/PROGRAM COORDINATOR	2	1	0	0	0	0	0	0	0	0	0
		Τ.	1	1	0	0	0	0	0	0	O .
INSTRUCTOR	2	7	2	2	0	0	0	0	0	0	0
	2	7	5	5	0	0	0	0	0	0	U
INSTRUCTOR/REMOTE TECHNOLOGIES PROGRAM COORDINATOR	2	1	1	1	0	0	0	0	0	0	0
	2	Τ	0	0	0	0	0	0	0	0	U
INSTRUCTOR/PROGRAM COORDINATOR INFORMATION TECHNOLOGY AND	2	1	1	1	0	0	0	0	0	0	0
DATABASE MANAGEME	2	Τ	0	0	0	0	0	0	0	0	U
LECTURER/DIRECTOR OF ACCELERATED STUDY IN ASSOCIATE	2	1	0	0	0	0	0	0	0	0	1
PROGRAMS	2	Τ	1	0	1	0	0	0	0	0	Τ
INSTRUCTOR/ENERGY COORDINATOR	2	1	1	1	0	0	0	0	0	0	0
	2	1	0	0	0	0	0	0	0	0	U
ASSISTANT PROFESSOR	2	1	0	0	0	0	0	0	0	0	0
	2	1	1	1	0	0	0	0	0	0	U
ASSISTANT PROFESSOR/AGRIBUSINESS PROGRAM COORDINATOR	2	1	0	0	0	0	0	0	0	0	0
	2	1	1	1	0	0	0	0	0	0	U
INSTRUCTOR/ASSOCIATE DEAN CULINARY ACADEMY	2	1	1	1	0	0	0	0	0	0	0
	۷		0	0	0	0	0	0	0	0	
ASSISTANT PROFESSOR/CHAIR MATH DEPARTMENT	2	1	0	0	0	0	0	0	0	0	0
		1	1	1	0	0	0	0	0	0	U

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Title	EEO	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
INSTRUCTOR/MECHATRONICS FACULTY & SOLAR PROGRAM	2	1	1	1	0	0	0	0	0	0	0
COORDINATOR	۷	1	0	0	0	0	0	0	0	0	I
INSTRUCTOR/PROGRAM COORDINATOR	2	1	0	0	0	0	0	0	0	0	0
	۷	Т	1	1	0	0	0	0	0	0	<u> </u>
INSTRUCTOR/DIRECTOR OF ELECTRIC UTILITY & SAFETY TRAINING	2	1	1	1	0	0	0	0	0	0	0
	2	Т	0	0	0	0	0	0	0	0	<u> </u>
INSTRUCTOR/ASSOCIATE DEAN OF ADVANCE MANUFACTURING	2	1	1	1	0	0	0	0	0	0	0
	2	1	0	0	0	0	0	0	0	0	I
ASSOCIATE PROFESSOR/ASSOCIATE DEAN CAREER ADVANCEMENT	2	1	0	0	0	0	0	0	0	0	0
	۷	1	1	1	0	0	0	0	0	0	I
LECTURER/CYBERSECURITY PROGRAM COORDINATOR	1	1	0	0	0	0	0	0	0	0	0
	1	Т	1	1	0	0	0	0	0	0	<u> </u>
INSTRUCTOR/MECHATRONICS LAB ASSISTANT/FACILITIES	1	1	1	1	0	0	0	0	0	0	0
SPECIALIST	1	1	0	0	0	0	0	0	0	0	I
INSTRUCTOR/DIRECTOR OF OPERATIONS	1	1	0	0	0	0	0	0	0	0	0
	1	1	1	1	0	0	0	0	0	0	I
PROFESSOR/VICE PRESIDENT ENGINEERING-WORKFORCE	1	1	0	0	0	0	0	0	0	0	0
DEVELOPMENT/TECHNOLOGIES	1	1	1	1	0	0	0	0	0	0	I
Summary of WORK		118	60	56	2	1	1	0	0	0	7
		118	58	55	2	0	1	0	0	0	/ 

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Title	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
Summary	331	129	117	8	2	2	0	0	0	27
	331	202	187	10	3	2	0	0	0	21

Contractors and subcontractors are required to include in their AAPs a "job group analysis" by combining jobs at the establishment with similar content, wage rates, and opportunities to form job groups. 41 C.F.R. § 60-2.12. The job group analysis is a contractor's first comparison of the representation of minorities and women in its workforce with the estimated availability of minorities and women to be employed. The job group is created by first sorting the various jobs at the establishment into job groups, which is a collection of jobs in an organization with similar job content (field of work and/or skill level), similar promotional opportunities, and similar compensation. The job groups then are developed to fit the unique characteristics of each organizational unit, taking into account the size, type, and complexity of the work performed. Contractors, after combining the job titles for the job group analysis, must then separately provide the percentage of minorities and the percentage of women they employ in each job group.

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1 Idil Bate: 00/01/2020						<u> </u>				- OOLLEGE
Executive/Administrative/Managerial										
Title	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
LECTURER/CYBERSECURITY PROGRAM COORDINATOR	1	0	0	0	0	0	0	0	0	
	1	1	1	0	0	0	0	0	0	0
INSTRUCTOR/MECHATRONICS LAB ASSISTANT/FACILITIES SPECIALIST	1	1	1	0	0	0	0	0	0	0
	1	0	0	0	0	0	0	0	0	0
DIRECTOR OF FINANCIAL AID	1	0	0	0	0	0	0	0	0	0
	1	1	1	0	0	0	0	0	0	0
DIRECTOR OF HUMAN RESOURCES	1	0	0	0	0	0	0	0	0	0
	1	1	1	0	0	0	0	0	0	U
PROFESSOR/REGISTRAR	1	0	0	0	0	0	0	0	0	0
		1	1	0	0	0	0	0	0	U
INSTRUCTOR/DIRECTOR OF OPERATIONS	1	0	0	0	0	0	0	0	0	0
	Τ	1	1	0	0	0	0	0	0	0
COMPTROLLER	1	0	0	0	0	0	0	0	0	0
		1	1	0	0	0	0	0	0	0
ASSOCIATE DEAN/STUDENTS	1	0	0	0	0	0	0	0	0	0
		1	1	0	0	0	0	0	0	O
VICE PRESIDENT OF INFORMATION TECHNOLOGY	1	1	1	0	0	0	0	0	0	0
		0	0	0	0	0	0	0	0	
ASSISTANT PROFESSOR/VICE PRESIDENT OF ENROLLMENT MANAGEMENT	1	0	0	0	0	0	0	0	0	0
		1	1	0	0	0	0	0	0	
PROFESSOR/ CHIEF FINANCIAL AND ADMINISTRATIVE OFFICER/VICE PRESIDENT OF PSU	1	1	1	0	0	0	0	0	0	0
EVECTOENT OF 100		0	0	0	0	0	0	0	0	
PROFESSOR/VICE PRESIDENT ENGINEERING-WORKFORCE DEVELOPMENT/TECHNOLOGIES	1	0	0	0	0	0	0	0	0	0
DDVDDOIPDMI/ IDCHNODOGIES		1	1	0	0	0	0	0	0	

Executive/Administrative/Managerial										
Title	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
PRESIDENT	1	1	1	0	0	0	0	0	0	0
	1	0	0	0	0	0	0	0	0	U
Summary of Executive/Administrative/Managerial	1.2	4	4	0	0	0	0	0	0	0
•	13	9	9	0	0	0	0	0	0	U

Faculty										
Title	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
STUDENT RECORDS ASSISTANT	1	0	0	0	0	0	0	0	0	1
	T	1	0	1	0	0	0	0	0	
ASSISTANT PROFESSOR/LEGAL STUDIES	1	0	0	0	0	0	0	0	0	0
		1	1	0	0	0	0	0	0	I
ASSISTANT PROFESSOR/MATH SKILLS	1	0	0	0	0	0	0	0	0	0
	1	1	1	0	0	0	0	0	0	I
ASSISTANT PROFESSOR/INSTRUCTIONAL TECHNOLOGIST	1	0	0	0	0	0	0	0	0	0
	1	1	1	0	0	0	0	0	0	U I
ASSISTANT PROFESSOR/ACADIC PROGRAM SPECIALIST	1	0	0	0	0	0	0	0	0	0
	1	1	1	0	0	0	0	0	0	0
ASSISTANT PROFESSOR/COMPUTER APPLICATIONS COORDINATOR	1	0	0	0	0	0	0	0	0	1
	1	1	0	1	0	0	0	0	0	
ASSISTANT PROFESSOR/PROGRAM COORDINATOR	2	1	1	0	0	0	0	0	0	0
	2	1	1	0	0	0	0	0	0	0
ASSISTANT PROFESSOR/DEVELOPMENTAL ENGLISH	1	0	0	0	0	0	0	0	0	0
	1	1	1	0	0	0	0	0	0	I
ASSISTANT PROFESSOR	6	3	2	0	1	0	0	0	0	1
	6	3	3	0	0	0	0	0	0	1
ASSISTANT PROFESSOR/AGRIBUSINESS PROGRAM COORDINATOR	1	0	0	0	0	0	0	0	0	0
	1	1	1	0	0	0	0	0	0	0
ASSISTANT PROFESSOR /ASSOCIATE DEAN	1	0	0	0	0	0	0	0	0	
	1	1	1	0	0	0	0	0	0	0
ASSISTANT PROFESSOR/CHAIR MATH DEPARTMENT	4	0	0	0	0	0	0	0	0	
	1	1	1	0	0	0	0	0	0	0

Faculty										
Title	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
ASSOCIATE PROFESSOR/Director OF PRIOR LEARNING	1	0	0	0	0	0	0	0	0	0
	1	1,	1	0	0	0	0	0	0	U
ASSOCIATE PROFESSOR/ASSOCIATE DEAN OF HUMANITIES	1	0	0	0	0	0	0	0	0	0
	1	1	1	0	0	0	0	0	0	O
ASSISTANT PROFESSOR/ASSOCIATE DEAN OF INFORMATION TECHNOLOGY &	1	0	0	0	0	0	0	0	0	0
MATH	1	1,	1	0	0	0	0	0	0	O
ASSISTANT PROFESSOR/DIRECTOR OF NURSING	1	0	0	0	0	0	0	0	0	0
	1	1	1	0	0	0	0	0	0	0
ASSOCIATE PROFESSOR/CHAIR ALLIED HEALTH SCIENCES DIVISION	1	1	1	0	0	0	0	0	0	0
PROGRAM	1	0	0	0	0	0	0	0	0	U
ASSOCIATE PROFESSOR/CONTENT SPECIALIST	1	0	0	0	0	0	0	0	0	0
	1	1	1	0	0	0	0	0	0	U
ASSOCIATE PROFESSOR/ASSOCIATE DEAN CAREER ADVANCEMENT	1	0	0	0	0	0	0	0	0	0
	1	1	1	0	0	0	0	0	0	U
ASSOCIATE PROFESSOR/DEAN OF PSUT	1	0	0	0	0	0	0	0	0	0
	1	1	1	0	0	0	0	0	0	0
ASSOCIATE PROFESSOR	1	0	0	0	0	0	0	0	0	0
	1	1	1	0	0	0	0	0	0	U
PROFESSOR/PHYSICAL THERAPY ASSISTANT PROGRAM COORDINATOR	1	0	0	0	0	0	0	0	0	0
	1	1	1	0	0	0	0	0	0	U
PROFESSOR	1	1	1	0	0	0	0	0	0	0
		0	0	0	0	0	0	0	0	
PROFESSOR/LIBERAL ARTS COORDINATOR	1	0	0	0	0	0	0	0	0	0
		1	1	0	0	0	0	0	0	U

					- 3		- 4 -			
Faculty										
Title	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
Summary of Faculty	30	6	5	0	1	0	0	0	0	0
	30	24	22	2	0	0	0	0	0	3

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Instructors/Lecturers										
Title	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
INSTRUCTOR/WORKFORCE PROGRAMS INSTRUCTIONAL SPECIALIST	1	0	0	0	0	0	0	0	0	0
	_	1	1	0	0	0	0	0	0	O
INSTRUCTOR/MEDICAL EXTERNSHIP COORDINATOR	1	0	0	0	0	0	0	0	0	0
		1	1	0	0	0	0	0	0	O
INSTRUCTOR/INSTRUCTIONAL SPECIALIST	1	0	0	0	0	0	0	0	0	0
		1	1	0	0	0	0	0	0	O
LECTURER/EMS CLINICAL COORDINATOR	1	1	1	0	0	0	0	0	0	0
	1	0	0	0	0	0	0	0	0	0
INSTRUCTOR/ SERVERY SHIFT SUPERVISOR	1	1	1	0	0	0	0	0	0	0
	1	0	0	0	0	0	0	0	0	U
LECTURER/HEALTH INFORMATION MANAGEMENT EXTERNSHIP COORDINATOR	1	1	1	0	0	0	0	0	0	0
		0	0	0	0	0	0	0	0	U
LECTURER/INSTRUCTIONAL SPECIALIST	2	1	1	0	0	0	0	0	0	0
	۷	1	1	0	0	0	0	0	0	0
LECTURER	15	8	8	0	0	0	0	0	0	1
	10	7	6	1	0	0	0	0	0	Τ.
LECTURER/CRIMINAL JUSTICE PROGRAM COORDINATOR	1	1	1	0	0	0	0	0	0	0
		0	0	0	0	0	0	0	0	U
INSTRUCTOR/HUMAN SERVICES PROGRAM COORDINATOR	1	0	0	0	0	0	0	0	0	0
	Τ	1	1	0	0	0	0	0	0	0
LECTURER/EARLY CHILDHOOD PROGRAM COORDINATOR	1	0	0	0	0	0	0	0	0	0
		1	1	0	0	0	0	0	0	
INSTRUCTOR	11	4	4	0	0	0	0	0	0	0
	1	7	7	0	0	0	0	0	0	U

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Instructors/Lecturers										
Title	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
INSTRUCTOR/SOCIAL SCIENCES PROGRAM COORDINATOR	1	0	0	0	0	0	0	0	0	0
		1	1	0	0	0	0	0	0	O
INSTRUCTOR/EDUCATION PROGRAM COORDINATOR	1	1	1	0	0	0	0	0	0	0
		0	0	0	0	0	0	0	0	O .
LECTURER/EMS PROGRAM DIRECTOR	1	0	0	0	0	0	0	0	0	0
		1	1	0	0	0	0	0	0	Ů.
LECTURER/ENVIRONMENTAL TECHNICIAN PROGRAM COORDINATOR	1	1	1	0	0	0	0	0	0	0
		0	0	0	0	0	0	0	0	O .
INSTRUCTOR/E-LEARN ADMINISTRATOR	1	0	0	0	0	0	0	0	0	0
		1	1	0	0	0	0	0	0	O
INSTRUCTOR/HEALTH INFORMATION MANAGEMENT PROGRAM COORDINATOR	1	0	0	0	0	0	0	0	0	0
		1	1	0	0	0	0	0	0	V
INSTRUCTOR/REMOTE TECHNOLOGIES PROGRAM COORDINATOR	1	1	1	0	0	0	0	0	0	0
	_	0	0	0	0	0	0	0	0	U
INSTRUCTOR/PROGRAM COORDINATOR INFORMATION TECHNOLOGY AND	1	1	1	0	0	0	0	0	0	0
DATABASE MANAGEME		0	0	0	0	0	0	0	0	· ·
LECTURER/DIRECTOR OF ACCELERATED STUDY IN ASSOCIATE PROGRAMS	1	0	0	0	0	0	0	0	0	1
		1	0	1	0	0	0	0	0	Τ.
INSTRUCTOR/ENERGY COORDINATOR	1	1	1	0	0	0	0	0	0	0
	_	0	0	0	0	0	0	0	0	O
INSTRUCTOR/ASSOCIATE DEAN CULINARY ACADEMY	1	1	1	0	0	0	0	0	0	0
		0	0	0	0	0	0	0	0	0
INSTRUCTOR/MECHATRONICS FACULTY & SOLAR PROGRAM COORDINATOR	1	1	1	0	0	0	0	0	0	0
		0	0	0	0	0	0	0	0	

Instructors/Lecturers										
Title	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
INSTRUCTOR/PROGRAM COORDINATOR	1	0	0	0	0	0	0	0	0	0
		1	1	0	0	0	0	0	0	
INSTRUCTOR/DIRECTOR OF ELECTRIC UTILITY & SAFETY TRAINING	1	1	1	0	0	0	0	0	0	0
		0	0	0	0	0	0	0	0	U
INSTRUCTOR/ASSOCIATE DEAN OF ADVANCE MANUFACTURING	1	1	1	0	0	0	0	0	0	0
		0	0	0	0	0	0	0	0	U
Summary of Instructors/Lecturers	F.0	26	26	0	0	0	0	0	0	2
•	52	26	24	2	0	0	0	0	0	

Adjunct Faculty										
Title	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
Adjunct Lecturer	153	69	62	5	0	2	0	0	0	10
	133	84	81	3	0	0	0	0	0	10
Summary of Adjunct Faculty	150	69	62	5	0	2	0	0	0	10
	153	84	81	3	0	0	0	0	0	10

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Professional Non-Faculty										<u> </u>
Title	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
PART-TIME PROGRAM MANAGER	1	0	0	0	0	0	0	0	0	0
		1	1	0	0	0	0	0	0	U
ADMISSION COUNSELOR	2	0	0	0	0	0	0	0	0	0
	۷	2	2	0	0	0	0	0	0	U
EDUCATION COUNSELOR	1	0	0	0	0	0	0	0	0	0
		1	1	0	0	0	0	0	0	U
E-LEARNING HELP DESK ASSOCIATE	1	0	0	0	0	0	0	0	0	0
		1	1	0	0	0	0	0	0	U
STUDENT DEVELOPMENT SPECIALIST	1	0	0	0	0	0	0	0	0	0
		1	1	0	0	0	0	0	0	U
STUDENT DEVELOPMENT COORDINATOR	1	0	0	0	0	0	0	0	0	0
		1	1	0	0	0	0	0	0	U
TESTING COORDINATOR	1	0	0	0	0	0	0	0	0	0
		1	1	0	0	0	0	0	0	U
OFFICE ADMINISTRATOR	1	0	0	0	0	0	0	0	0	0
		1	1	0	0	0	0	0	0	U
A/R SUPERVISOR	1	0	0	0	0	0	0	0	0	0
		1	1	0	0	0	0	0	0	U
FINANCIAL AID COUNSELOR	2	0	0	0	0	0	0	0	0	0
	2	2	2	0	0	0	0	0	0	0
FINANCIAL AID COUNSELOR - SR	1	0	0	0	0	0	0	0	0	1
		1	0	0	1	0	0	0	0	1
PROCUREMENT & PURCHASING CARD MANAGER	1	1	1	0	0	0	0	0	0	0
		0	0	0	0	0	0	0	0	0

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Professional Non-Faculty										r correge
Title	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
STAFFACCOUNTANT	1	0	0	0	0	0	0	0	0	0
	1	1	1	0	0	0	0	0	0	I
INSTRUCTOR/PROGRAM COORDINATOR/FOUNDATION ASSISTANT	1	0	0	0	0	0		0	0	0
		1	1	0	0	0	Ť	0	0	<del> </del>
INFORMATION TECHNOLOGY CONSULTANT	2	1	1	0	0	0		0	0	0
		1	1	0	0	0		0	0	
VETERAN EDUCATION COORDINATOR	1	0	0	0	0	0		0	0	0
3.00017/1937/19		1	1	1	0			0		
ACCOUNTANT	1	0	0	0	0	0		0	0	1
HUMAN RESOURCES REPRESENTATIVE	1	0	0	0	0	0	0	0	0	
	1	1	1	0	0	0	0	0	0	0
CAREER SERVICES OUTREACH & PLACEMENT SPECIALIST	1	0	0	0	0	0	0	0	0	1
	1	1	0	0	1	0	0	0	0	
TALENT ACQUISITION & DEVELOMENT COORDINATOR	1	0	0	0	0	0	0	0	0	0
		1	1	0	0	0	0	0	0	
PROGRAM COORDINATOR	1	0	0	0	0	0	0	0	0	0
		1	1	0	0	0	0	0	0	
LECTURER/INTERNSHIP PLACEMENT & ALUMNI OUTREACH COORDINATOR	1	0	0	0	0	0		0	0	0
		1	1	0	0	0	0	0	0	
BUSINESS OPERATIONS ANALYST	1	0	0	0	0	0	1	0	0	0
		1	1	0	0	0		0	0	
ACCOUNTANT SR	1	0	0	0	0	0		0	0	0
		1	1	0	0	0	0	0	0	L

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Professional Non-Faculty										
Title	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
EXECUTIVE ASSISTANT TO THE PRESIDENT/BTG WIB COORDINATOR	1	0	0	0		0		0	0	0
		1	1	0	0	0	0	0	0	
PROGRAM COORDINATOR - SENIOR	1	1	1	0	0	0	0	0	0	0
		0	0	0	0	0	0	0	0	
ASSOCIATE PROFESSOR/COORDINATOR OF MARKETING/DIRECTOR OF STUDENT	1	0	0	0	0	0	0	0	0	0
SERVICES	1	1	1	0	0	0	0	0	0	U
MANAGER OF ACCOUNTING	1	0	0	0	0	0	0	0	0	0
	1	1	1	0	0	0	0	0	0	0
APPLICATION SYSTEM ANALYST PROGRAMMER SR	1	1	1	0	0	0	0	0	0	0
	1	0	0	0	0	0	0	0	0	0
DIRECTOR OF CUSTOMIZED TRAINING	1	0	0	0	0	0	0	0	0	0
	1	1	1	0	0	0	0	0	0	0
FOUNDATION DIRECTOR/ASSISTANT DIRECTOR WORKFORCE & ENGINEERING	_	0	0	0	0	0	0	0	0	_
TECHNOLOGIES		1	1	0	0	0	0	0	0	0
Summary of Professional Non-Faculty	0.4	5	4	1	0	0	0	0	0	
•	34	29	27	0	2	0	0	0	0	3

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Clerical and Secretarial										r correge
Title	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
PART-TIME CASHIER	2	0	0	0	0	0	0	0	0	0
	2	2	2	0	0	0	0	0	0	<u> </u>
ACCOUNTING ASSISTANT I	1	0	0	0	0	0	0	0	0	0
		1	1	0	0	0	0	0	0	
ADMINISTRATIVE ASSISTANT	1	0	0	0	0	0		0	0	0
		1	1	0	0	0		0	0	
FINANCIAL AID ASSISTANT II	1	0	0	0	0	0		0	0	1
		1	0	1		0		0	0	
RECORDS ASSISTANT I	1	0	0	0	0	0		0	0	0
		1	1	0	0	0		0	0	
RECEIVING/INVENTORY CONTROL ASSISTANT	1	0	1 0	0	0	0		0	0	0
ADMINISTRATIVE SECRETARY		0	0	0	0	0		0	0	
ADMINISTRATIVE SECRETARY	1	1	1	0	0	0		0	0	0
ADMINISTRATIVE SECRETARY SR	_	0	0	0	0	0	0	0	0	
	2	2	2	0	0	0	0	0	0	0
PROGRAM ASSISTANT II	2	0	0	0	0	0	0	0	0	0
	۷	2	2	0	0	0	0	0	0	U
RECORDS ASSISTANT II	2	0	0	0	0	0	0	0	0	0
	2	2	2	0	0	0	0	0	0	U
PROGRAM ASSISTANT I	1	0	0	0	0	0	0	0	0	0
		1	1	0	0	0	0	0	0	O .
PROJECT COORDINATOR	1	0	0	0	0	0	0	0	0	0
		1	1	0	0	0	0	0	0	

Clerical and Secretarial										
Title	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
Summary of Clerical and Secretarial	1.6	1	1	0	0	0	0	0	0	1
	16	15	14	1	0	0	0	0	0	Δ,

Technical and Paraprofessional										
Title	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
PURCHASING ASSISTANT I	1	0	0	0	0	0	0	0	0	C
		1	1	0	0	0	0	0	0	
PART-TIME PROGRAM ASSISTANT	1	0	0	0	0	0	0	0	0	C
		1	1	0	0	0	0	0	0	O
A/R ACCOUNTING CLERK III	1	0	0	0	0	0	0	0	0	C
		1	1	0	0	0	0	0	0	O
HUMAN RESOURCES ASSISTANT III	1	0	0	0	0	0	0	0	0	0
	1	1	1	0	0	0	0	0	0	C
GRAPHIC DESIGNER	1	0	0	0	0	0	0	0	0	0
	1	1	1	0	0	0	0	0	0	0
MANAGER A/P	1	0	0	0	0	0	0	0	0	0
		1	1	0	0	0	0	0	0	0
Summary of Technical and Paraprofessional		0	0	0	0	0	0	0	0	•
•	6	6	6	0	0	0	0	0	0	0

Skilled Crafts										
Title	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
LAB ASSISTANT II	2	2	1	0	1	0	0	0	0	1
	۷	0	0	0	0	0	0	0	0	1
INFORMATION TECHNOLOGY ASSISTANT	2	2	2	0	0	0	0	0	0	0
	2	0	0	0	0	0	0	0	0	U
PART-TIME LAB ASSISTANT	2	2	2	0	0	0	0	0	0	0
	2	0	0	0	0	0	0	0	0	U
Summary of Skilled Crafts	(	6	5	0	1	0	0	0	0	1
	0	0	0	0	0	0	0	0	0	1

Service/Maintenance										
Title	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
PART-TIME CAMPUS SERVICE WORKER	1	0	0	0	0	0	0	0	0	1
		1	0	1	0	0	0	0	0	
PART-TIME SECURITY GUARD	3	3	2	1	0	0	0	0	0	1
	J	0	0	0	0	0	0	0	0	
CAMPUS SERVICE WORKER	6	1	0	1	0	0	0	0	0	5
	O O	5	1	1	1	2	0	0	0	<u> </u>
SECURITY GUARD	8	5	5	0	0	0	0	0	0	0
	O	3	3	0	0	0	0	0	0	0
CAMPUS MAINTENANCE SPECIALIST	1	1	1	0	0	0	0	0	0	0
	1	0	0	0	0	0	0	0	0	0
MANAGER PHYSICAL PLANT 1	1	1	1	0	0	0	0	0	0	0
		0	0	0	0	0	0	0	0	O
DIRECTOR OF PUBLIC SAFTEY	1	1	1	0	0	0	0	0	0	0
		0	0	0	0	0	0	0	0	
Summary of Service/Maintenance	21	12	10	2	0	0	0	0	0	7
	21	9	4	2	1	2	0	0	0	1

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Title	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Indian	Two or More	Minority
Summary	321	129	117	8	2	2	0	0	0	27
	331	202	187	10	3	2	0	0	0	۷ /

Contractors and covered Federal subcontractors, after aggregating individual jobs into job groups, are then required to determine the availability of women and minorities for those job groups. 41 C.F.R. § 60-2.14. "Availability" is a percentage estimate of the women and minorities who have the skills required to perform the jobs within the job groups. To determine the availability percentages, contractors are required to consider two factors: 1) factors reflecting the availability outside the contractor's workforce (such as people in the immediate labor area or reasonable recruitment area); and, 2) factors affecting the availability inside the contractor's own workforce (such as people who are qualified and available by transfer, promotion, or training). Contractors typically rely on the most current U.S. Census data to develop their external availability factors, and on their own workforce numbers to develop their internal availability factors. Both external and internal factors must be considered, but contractors may "weight" each of the two factors according to each factor's relevance to the job group in question. Such weighting is included in the following availability statistics for each job group.

After a contractor has formulated job groups and determined the minority and female availability percentages for each job group, it must then compare the actual utilization of minorities and women in each job group with their estimated availability, and identify those job groups where the percentage of women and/or minorities employed is less than would reasonably be expected given their availability. 41 C.F.R. § 60-2.15.

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#### Executive/Administrative/Managerial

Factor	Description	Raw Sta		Weight	Weighte Minority	d Factor Female	Source of Statistics	Reason for Weighting
1	The percentage of minorities or women with requisite skills in the RRA. The RRA is defined as the geographical area from which the contractor usually seeks or reasonably could seek workers to fill the positions in question.	15	60	95	14	57	2010 Census EEO Special File for appropriate Occupational Titles. See supporting documents.	Reasonable recruiting practices and business necessity. Consideration given to past practices and current demands.
2	The percentage of minorities or women among those promotable, transferable, and trainable within the contractor's organization. Trainable refers to those employees that, with reasonably provided training, become qualified during the AAP year.	9	85	5	0	4	Incumbent work force for those Job Groups that constitute "feeders" to this Job Group.	Reasonable recruiting practices and business necessity. Consideration given to past practices and current demands.
				100				
Job Grou	up Size: 13		Final Availa	ability (%)	15	61		

an Date: 05/01/2020		Blue Ridge	Communi	ty & Tec	hnical Colle
xecutive/Administrative/Managerial					
actor 1: External Availability					
ternal Availability from the RRA					
Census Areas for RRA	Value				
Franklin	7	<b>D</b> 04 45	(0/)		
Census Codes used for RRA		Raw Stati Minority	remale	Value	
0110 Computer and information systems manager	s	5	8	1	
0120 Financial managers		3	69	1	
0136 Human resources managers		0	74	1	
0230 Education administrators		6	69	3	
Winchester VA-WV	8				
Census Codes used for RRA	1	Raw Stati Minority	istics (%) Female	Value	
0110 Computer and information systems manager	S	13	36	1	
0120 Financial managers		4	77	1	
0136 Human resources managers		11	60	1	
0230 Education administrators		6	63	3	
Hagerstown-Martinsburg MD-WV	19				<u> </u>
Census Codes used for RRA	,	Raw Stati Minority	istics (%) Female	Value	
Ollo Computer and information systems manager	S	20	49	1	
0120 Financial managers		6	64	1	
0136 Human resources managers		14	46	1	

an Date: 05/01/2020		Bl	ue Ridge	Communi	ty & Tec	hnical C	ollege
Executive/Administrative/Managerial							
actor 1: External Availability							
0230 Education administrators			20	66	3		
Jefferson	35		D 64-4	-4: (0/)			
Census Codes used for RRA	·	-	Raw Stati Minority	stics (%) Female	Value		
0110 Computer and information systems managers			21	14	1		
0120 Financial managers			13	83	1		
0136 Human resources managers			0	100	1		
0230 Education administrators			2	54	3		
Berkeley+Morgan	165		<b>D</b> 64.4	(0/)			
Census Codes used for RRA	·	-	Raw Stati Minority	Stics (%) Female	Value		
0110 Computer and information systems managers			32	56	1		
0120 Financial managers			0	69	1		
0136 Human resources managers			14	35	1		
0230 Education administrators			20	67	3		
			Raw Stati	stics (%)		Weighted F	actor (%)
			Minority	Female	Value	Minority	Female
nal Statistics for External Availability			15	60	95	14	5'
actor 2: Internal Availability							
•			Raw Stati	stics (%)			
Source Description			Minority	Female	Value	1	
Professional Non-Faculty			9	85	3		

Executive/Administrative/Managerial					
	Raw Stat	istics (%)		Weighted F	actor (%)
	Minority	Female	Value	Minority	Female
Final Statistics for Internal Availability	9	85	5	0	4

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		Raw Sta	atistics		<b>Weighte</b>	d Factor		
Factor	Description	Minority	Female	Weight	Minority	Female	Source of Statistics	Reason for Weighting
1	The percentage of minorities or women with requisite skills in the RRA. The RRA is defined as the geographical area from which the contractor usually seeks or reasonably could seek workers to fill the positions in question.	0	0	0	0	0	2010 Census EEO Special File for appropriate Occupational Titles. See supporting documents.	Reasonable recruiting practices and business necessity. Consideration given to past practices and current demands.
2	The percentage of minorities or women among those promotable, transferable, and trainable within the contractor's organization. Trainable refers to those employees that, with reasonably provided training, become qualified during the AAP year.	7	65	100	7	65	Incumbent work force for those Job Groups that constitute "feeders" to this Job Group.	Reasonable recruiting practices and business necessity. Consideration given to past practices and current demands.

65

7

Final Availability (%)

Job Group Size: 30

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Factor 2: Internal Availability

Source Description

Raw Statistics (%)
Minority Female Value

	~			
Minority	Female	Value		
10	80	1		
4	50	1		
Raw Stati	istics (%)		Weighted F	actor (%)
Minority	Female	Value	Minority	Female
7	65	100	7	65
	Minority  10 4  Raw Stati	Minority Female  10 80 4 50  Raw Statistics (%) Minority Female	Minority     Female     Value       10     80     1       4     50     1       Raw Statistics (%)       Minority     Female     Value	10 80 1 4 50 1  Raw Statistics (%) Weighted F Minority Female Value Minority

Instri	ıctors/	/l ecti	irers
ロコンロレ	101015/	'LECIL	11 513

		Raw Sta	atistics		Weighte	d Factor		
Factor	Description	Minority	Female	Weight	Minority	Female	Source of Statistics	Reason for Weighting
1	The percentage of minorities or women with requisite skills in the RRA. The RRA is defined as the geographical area from which the contractor usually seeks or reasonably could seek workers to fill the positions in question.	16	65	98	16	64	2010 Census EEO Special File for appropriate Occupational Titles. See supporting documents.	Reasonable recruiting practices and business necessity. Consideration given to past practices and current demands.
2	The percentage of minorities or women among those promotable, transferable, and trainable within the contractor's organization. Trainable refers to those employees that, with reasonably provided training, become qualified during the AAP year.	6	68	2	0	1	Incumbent work force for those Job Groups that constitute "feeders" to this Job Group.	Reasonable recruiting practices and business necessity. Consideration given to past practices and current demands.
				100				
Job Grou	up Size: 52		Final Avail	ability (%)	16	65		

Plan Date: 05/01/2020 Blue Ridge Community & Technical College Instructors/Lecturers Factor 1: External Availability External Availability from the RRA **Census Areas for RRA** Value Franklin 7 Raw Statistics (%) Census Codes used for RRA Minority Female Value 0230 Education administrators 6 69 4 Winchester VA-WV 8 Raw Statistics (%) Census Codes used for RRA Minority **Female** Value 0230 Education administrators 6 63 Hagerstown-Martinsburg MD-WV 19 Raw Statistics (%) Census Codes used for RRA **Minority Female** Value 0230 Education administrators 20 4 66 Jefferson 35 Raw Statistics (%) Census Codes used for RRA Minority Female Value 0230 Education administrators 2 54 Berkeley+Morgan 165 Raw Statistics (%) Census Codes used for RRA Value Minority Female

20

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4

0230 Education administrators

Plan Date: 05/01/2020	Blue Ridge	e Communi	ty & Tec	hnical (	College
Instructors/Lecturers					
	Raw Sta	tistics (%)		Weighted F	actor (%)
	Minority	Female	Value	Minority	Female
Final Statistics for External Availability	16	65	98	16	64
Factor 2: Internal Availability					
	Raw Sta	tistics (%)			
Source Description	Minority	Female	Value		
Professional Non-Faculty	9	85	1		
Instructors/Lecturers	4	50	1		
	Raw Sta	tistics (%)		Weighted F	actor (%)
	Minority	Female	Value	Minority	Female
Final Statistics for Internal Availability	6	68	2	0	1

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Ad	junct	Faci	ıltv
πuj	Julici	i act	лιцу

		Raw Sta	atistics		<u>Weighte</u>	d Factor		
Factor	Description	Minority	Female	Weight	Minority	Female	Source of Statistics	Reason for Weighting
1	The percentage of minorities or women with requisite skills in the RRA. The RRA is defined as the geographical area from which the contractor usually seeks or reasonably could seek workers to fill the positions in question.	0	0	98	0	0	2010 Census EEO Special File for appropriate Occupational Titles. See supporting documents.	Reasonable recruiting practices and business necessity. Consideration given to past practices and current demands.
2	The percentage of minorities or women among those promotable, transferable, and trainable within the contractor's organization. Trainable refers to those employees that, with reasonably provided training, become qualified during the AAP year.	9	85	2	0	2	Incumbent work force for those Job Groups that constitute "feeders" to this Job Group.	Reasonable recruiting practices and business necessity. Consideration given to past practices and current demands.
				100				
Job Grou	up Size: 153		Final Avail	ability (%)	0	2		

Plan Date: 05/01/2020 Blue Ridge Community & Technical College Adjunct Faculty Factor 1: External Availability External Availability from the RRA **Census Areas for RRA** Value Franklin 7 Raw Statistics (%) Census Codes used for RRA Minority **Female** Value No census data available within this area. Winchester VA-WV 8 Raw Statistics (%) Census Codes used for RRA Minority **Female** Value No census data available within this area. Hagerstown-Martinsburg MD-WV 19 **Raw Statistics (%)** Census Codes used for RRA **Minority Female** Value No census data available within this area. Jefferson 35 Raw Statistics (%) Census Codes used for RRA Minority **Female** Value No census data available within this area. Berkeley+Morgan 165 **Raw Statistics (%)** Census Codes used for RRA **Female** Value Minority No census data available within this area.

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Adjunct Faculty						
	Raw Stat	istics (%)		Weighted Factor (%)		
	Minority	Female	Value	Minority	Female	
Final Statistics for External Availability	0	0	98	0	0	
Factor 2: Internal Availability						
	Raw Stat	istics (%)				
Source Description	Minority	Female	Value			
Professional Non-Faculty	9	85	1			
	Raw Stat	istics (%)	Weighted F	actor (%)		
	Minority	Female	Value	Minority	Female	
Final Statistics for Internal Availability	9	85	2	0	2	

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Professional	Non-Faculty
i i di Gooldiiai	INDII-I acuity

		Raw Statistics			Weighted Factor			
Factor	Description	-		Weight	Minority		Source of Statistics	Reason for Weighting
1	The percentage of minorities or women with requisite skills in the RRA. The RRA is defined as the geographical area from which the contractor usually seeks or reasonably could seek workers to fill the positions in question.	10	56	85	8	48	2010 Census EEO Special File for appropriate Occupational Titles. See supporting documents.	Reasonable recruiting practices and business necessity. Consideration given to past practices and current demands.
2	The percentage of minorities or women among those promotable, transferable, and trainable within the contractor's organization. Trainable refers to those employees that, with reasonably provided training, become qualified during the AAP year.	5	92	15	1	14	Incumbent work force for those Job Groups that constitute "feeders" to this Job Group.	Reasonable recruiting practices and business necessity. Consideration given to past practices and current demands.
				100				
Job Grou	up Size: 34		Final Avail	ability (%)	9	62		

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Blue Ridge Community & Technical College

Professional	Non-Faculty
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#### Factor 1: External Availability

#### External Availability from the RRA

	Census Areas for RRA Value				
1	ranklin 7	Dow 64-4	isting (0/)		
	Census Codes used for RRA	Raw Stati Minority	Female	Value	
0	100 Administrative services managers	0	100	1	
0	300 Architectural and engineering managers	0	0	1	
0	530 Purchasing agents, except wholesale, retail, and farm produc	0	48	1	
0	630 Human resources workers	0	75	1	
0	650 Training and development specialists	20	85	3	
0	710 Management analysts	6	15	1	
0	735 Market research analysts and marketing specialists	0	38	1	
0	740 Business operations specialists, all other	0	36	1	
0	800 Accountants and auditors	2	67	4	
1	010 Computer programmers	0	29	1	
1	050 Computer support specialists	14	34	2	
1	107 Computer occupations, all other	0	29	1	
2	000 Counselors	3	61	8	
5	000 First-line supervisors of office and administrative support	7	68	1	
5	700 Secretaries and administrative assistants	4	97	1	

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Blue Ridge Community & Technical College

Professional	Non-Faculty
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#### Factor 1: External Availability

Winchester VA-WV	8					
Census Codes used for RRA		ı	Raw Statis Minority	stics (%) Female	Value	
0100 Administrative services managers			0	39	1	
0300 Architectural and engineering managers			0	0	1	
0530 Purchasing agents, except wholesale, retail, and	farm produ	1C	0	75	1	
0630 Human resources workers			0	78	1	
0650 Training and development specialists			14	86	3	
0710 Management analysts			10	48	1	
0735 Market research analysts and marketing specialist	ts		0	83	1	
0740 Business operations specialists, all other			0	35	1	
0800 Accountants and auditors			26	46	4	
1010 Computer programmers			21	33	1	
1050 Computer support specialists			0	44	2	
1107 Computer occupations, all other			0	30	1	
2000 Counselors			5	79	8	
2550 Other education, training, and library workers			0	100	4	
5000 First-line supervisors of office and administrat:	ive support	5	29	71	1	
5700 Secretaries and administrative assistants			7	100	1	

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Blue Ridge Community & Technical College

Professional	Non-Faculty
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#### Factor 1: External Availability

agerstown-Martinsburg MD-WV	19				
Census Codes used for RRA			Raw Statis	` /	Valor.
			Minority	Female	Value
0100 Administrative services managers			0	0	1
0300 Architectural and engineering managers			0	0	1
0530 Purchasing agents, except wholesale, retail, and	farm produ	1C	10	63	1
0630 Human resources workers			4	68	1
0650 Training and development specialists			0	68	3
0710 Management analysts			18	35	1
0735 Market research analysts and marketing specialist	ts		17	74	1
0740 Business operations specialists, all other			27	71	1
0800 Accountants and auditors			11	59	4
1010 Computer programmers			14	19	1
.050 Computer support specialists			18	40	2
107 Computer occupations, all other			22	29	1
2000 Counselors			8	71	8
2550 Other education, training, and library workers			8	67	4
000 First-line supervisors of office and administrati	ive support	-	3	62	1
5700 Secretaries and administrative assistants			7	98	1

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Professional Non-Faculty						
ctor 1: External Availability						
Jefferson	35		D	(0/)		
Census Codes used for RRA		-	Raw Stati Minority	stics (%) Female	Value	
0100 Administrative services managers			0	0	1	
0530 Purchasing agents, except wholesale, retail, and	farm prod	uc	0	71	1	
0630 Human resources workers			0	13	1	
0650 Training and development specialists			0	33	3	
0710 Management analysts			20	61	1	
0735 Market research analysts and marketing specialist	s		0	100	1	
0740 Business operations specialists, all other			0	71	1	
0800 Accountants and auditors			7	64	4	
1010 Computer programmers			0	29	1	
1050 Computer support specialists			15	0	2	
1107 Computer occupations, all other			0	28	1	
2000 Counselors			47	84	8	
2550 Other education, training, and library workers			0	60	4	
5000 First-line supervisors of office and administration	ve suppor	t	5	63	1	
5700 Secretaries and administrative assistants			8	100	1	
Berkeley+Morgan	165		Dec State	-4: (0/)		
Census Codes used for RRA		_	Raw Stati Minority	stics (%) Female	Value	

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Blue Ridge Community & Technical College

Fig. 53/01/2020	brue kruge	Communit	cy a rec	imit car c	orrege
Professional Non-Faculty					
Factor 1: External Availability					
0100 Administrative services managers	0	0	1		
0530 Purchasing agents, except wholesale, retail, and farm produc	0	63	1		
0630 Human resources workers	9	60	1		
0650 Training and development specialists	0	71	3		
0710 Management analysts	0	31	1		
0735 Market research analysts and marketing specialists	33	83	1		
0740 Business operations specialists, all other	0	50	1		
0800 Accountants and auditors	7	53	4		
1010 Computer programmers	13	23	1		
1050 Computer support specialists	17	41	2		
1107 Computer occupations, all other	7	39	1		
2000 Counselors	11	61	8		
2550 Other education, training, and library workers	13	50	4		
5000 First-line supervisors of office and administrative support	4	64	1		
5700 Secretaries and administrative assistants	6	97	1		
	Raw Stat Minority	istics (%) Female	Value	Weighted F Minority	actor (%) Female
Final Statistics for External Availability	10	56	85	8	48

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Professional Non-Faculty					
actor 2: Internal Availability					
	Raw Sta	itistics (%)			
Source Description	Minority	Female	Value		
Clerical and Secretarial		94	2		
Technical and Paraprofessional	(	100	6		
Professional Non-Faculty	9	85	7		
	Raw St	atistics (%)		Weighted F	actor (
	Minority	Female	Value	Minority	Fem
nal Statistics for Internal Availability	Į.	92	15	1	

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$\bigcirc$		0	1:-1
Clerical	ana	SACTA	tariai
CICIICAI	anu	<b>00000</b>	lanai

Factor	Description	-	atistics Female	Weight	Weighte Minority	d Factor Female	Source of Statistics	Reason for Weighting
1	The percentage of minorities or women with requisite skills in the RRA. The RRA is defined as the geographical area from which the contractor usually seeks or reasonably could seek workers to fill the positions in question.	7	91	85	6	77	2010 Census EEO Special File for appropriate Occupational Titles. See supporting documents.	Reasonable recruiting practices and business necessity. Consideration given to past practices and current demands.
2	The percentage of minorities or women among those promotable, transferable, and trainable within the contractor's organization. Trainable refers to those employees that, with reasonably provided training, become qualified during the AAP year.	6	94	15	1	14	Incumbent work force for those Job Groups that constitute "feeders" to this Job Group.	Reasonable recruiting practices and business necessity. Consideration given to past practices and current demands.
				100				
Job Grou	Job Group Size: 16 Final Availability (%)				7	91		

Plan Date: 05/01/2020 Blue Ridge Community & Technical College Clerical and Secretarial Factor 1: External Availability External Availability from the RRA Census Areas for RRA Value Franklin 7 Raw Statistics (%) Census Codes used for RRA Value Minority Female 4720 Cashiers 10 85 5120 Bookkeeping, accounting, and auditing clerks 2 5350 Correspondence clerks and order clerks 11 63 0 3 5420 Information and record clerks, all other 100 5700 Secretaries and administrative assistants 97 6 5940 Miscellaneous office and administrative support workers, inc 20 65 3 Winchester VA-WV 8 Raw Statistics (%) Census Codes used for RRA **Minority Female** Value 4720 Cashiers 14 71 2 5120 Bookkeeping, accounting, and auditing clerks 11 87 5350 Correspondence clerks and order clerks 0 36 5420 Information and record clerks, all other 0 100 5700 Secretaries and administrative assistants 7 100 5940 Miscellaneous office and administrative support workers, inc 12 68 3

Plan Date: 05/01/2020 Blue Ridge Community & Technical College Clerical and Secretarial Factor 1: External Availability Hagerstown-Martinsburg MD-WV 19 Raw Statistics (%) **Census Codes used for RRA** Minority **Female** Value 2 4720 Cashiers 20 77 13 5120 Bookkeeping, accounting, and auditing clerks 92 5350 Correspondence clerks and order clerks 61 5420 Information and record clerks, all other 0 100 5700 Secretaries and administrative assistants 7 98 6 3 5940 Miscellaneous office and administrative support workers, inc 21 72 Jefferson 35 Raw Statistics (%) Census Codes used for RRA Minority **Female** Value 4720 Cashiers 89 5120 Bookkeeping, accounting, and auditing clerks 0 81 5350 Correspondence clerks and order clerks 0 31 5420 Information and record clerks, all other 0 100 5700 Secretaries and administrative assistants 8 100 6 5940 Miscellaneous office and administrative support workers, inc 12 3 40 Berkeley+Morgan 165 Raw Statistics (%) Census Codes used for RRA Minority Female Value 4720 Cashiers 2

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Plan Date: 05/01/2020	Blue Ridge	Communi	ty & Tec	hnical (	College
Clerical and Secretarial					
Factor 1: External Availability					
5120 Bookkeeping, accounting, and auditing clerks	11	93	1		
5350 Correspondence clerks and order clerks	0	85	1		
5420 Information and record clerks, all other	0	100	3		
5700 Secretaries and administrative assistants	6	97	6		
5940 Miscellaneous office and administrative support workers, inc	9	87	3		
	Raw Stat Minority	istics (%) Female	Value	Weighted F Minority	actor (%) Female
Final Statistics for External Availability	7	91	85	6	77
Factor 2: Internal Availability					
	Raw Stat	istics (%)			
Source Description	Minority	Female	Value		
Clerical and Secretarial	6	94	1		
	Raw Stat	istics (%)		Weighted F	actor (%)
	Minority	Female	Value	Minority	Female
Final Statistics for Internal Availability	6	94	15	1	14

Plan Date: 05/01/2020 Blue Ridge Community & Technical College

Technical and Paraprofessional

	·	Raw Sta	atistics		<u>Weighte</u>	d Factor		
Factor	Description	Minority	Female	Weight	Minority	Female	Source of Statistics	Reason for Weighting
1	The percentage of minorities or women with requisite skills in the RRA. The RRA is defined as the geographical area from which the contractor usually seeks or reasonably could seek workers to fill the positions in question.	20	55	95	19	52	2010 Census EEO Special File for appropriate Occupational Titles. See supporting documents.	Reasonable recruiting practices and business necessity. Consideration given to past practices and current demands.
2	The percentage of minorities or women among those promotable, transferable, and trainable within the contractor's organization. Trainable refers to those employees that, with reasonably provided training, become qualified during the AAP year.	0	100	5	0	5	Incumbent work force for those Job Groups that constitute "feeders" to this Job Group.	Reasonable recruiting practices and business necessity. Consideration given to past practices and current demands.
				100				
Job Grou	Job Group Size: 6 Final Availability (%)				19	57		

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or 1: External Availability					
rnal Availability from the RRA					
Census Areas for RRA	Value				
Franklin	7	<b>D</b> 6	(0/)		
Census Codes used for RRA		Raw Stati Minority	stics (%) Female	Value	
)430 Miscellaneous managers, including fur	neral service managers a	2	26	1	
630 Designers		0	72	1	
120 Bookkeeping, accounting, and auditing	g clerks	2	88	1	
150 Procurement clerks		0	0	1	
5360 Human resources assistants, except pa	ayroll and timekeeping	0	100	1	
Winchester VA-WV	8	<b>D</b> . St	(0/)		
Census Codes used for RRA		Raw Stati Minority	Female	Value	
430 Miscellaneous managers, including fur	neral service managers a	5	38	1	
550 Other education, training, and librar	ry workers	0	100	1	
630 Designers		0	67	1	
120 Bookkeeping, accounting, and auditing	g clerks	11	87	1	
150 Procurement clerks		0	86	1	
360 Human resources assistants, except pa	ayroll and timekeeping	0	25	1	
agerstown-Martinsburg MD-WV	19				
Census Codes used for RRA		Raw Stati Minority	stics (%) Female	Value	

Blue Ridge Community & Technical College

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Technical and Paraprofessional		_			
actor 1: External Availability					
0430 Miscellaneous managers, including funeral service ma	nagers	a 8	36	1	
2550 Other education, training, and library workers	8	67	1		
2630 Designers		11	41	1	
5120 Bookkeeping, accounting, and auditing clerks		13	92	1	
5150 Procurement clerks		0	86	1	
5360 Human resources assistants, except payroll and timek	eeping	71	29	1	
Jefferson	35	<b>D</b> (3)	• .• . (0.()		
Census Codes used for RRA		Raw Stat Minority	istics (%) Female	Value	
0430 Miscellaneous managers, including funeral service ma	nagers		24	1	
2550 Other education, training, and library workers		0	60	1	
2630 Designers		0	82	1	
5120 Bookkeeping, accounting, and auditing clerks		0	81	1	
Berkeley+Morgan	165		1		l
Census Codes used for RRA		Raw Stat Minority	istics (%) Female	Value	
O430 Miscellaneous managers, including funeral service ma	 nagers		24	1	
2550 Other education, training, and library workers		13	50	1	
2630 Designers		22	67	1	
5120 Bookkeeping, accounting, and auditing clerks		11	93	1	
5360 Human resources assistants, except payroll and timek	rooning	71	29	1	

Plan Date: 05/01/2020	Blue Ridge	Communi	ty & Tec	hnical (	College
Technical and Paraprofessional					
	Raw Stat	istics (%)		Weighted F	actor (%)
	Minority	Female	Value	Minority	Female
Final Statistics for External Availability	20	55	95	19	52
Factor 2: Internal Availability					
	Raw Stati	istics (%)			
Source Description	Minority	Female	Value		
Technical and Paraprofessional	0	100	1		
	Raw Stat	istics (%)		Weighted F	actor (%)
	Minority	Female	Value	Minority	Female
Final Statistics for Internal Availability	0	100	5	0	5

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Sĸ	Шe	dC	;ra:	tts:

Factor	Description		atistics Eomalo	Waight	Weighte Minority	d Factor	Source of Statistics	Posson for Woighting
1	The percentage of minorities or women with requisite skills in the RRA. The RRA is defined as the geographical area from which the contractor usually seeks or reasonably could seek workers to fill the positions in question.	10	60	80	8	48	2010 Census EEO Special File for appropriate Occupational Titles. See supporting documents.	Reason for Weighting  Reasonable recruiting practices and business necessity.  Consideration given to past practices and current demands.
2	The percentage of minorities or women among those promotable, transferable, and trainable within the contractor's organization. Trainable refers to those employees that, with reasonably provided training, become qualified during the AAP year.	8	65	20	2	13	Incumbent work force for those Job Groups that constitute "feeders" to this Job Group.	Reasonable recruiting practices and business necessity. Consideration given to past practices and current demands.
				100				
Job Gro	Job Group Size: 6 Final Availability (%)			9	61			

	Blue Ridge	Communi	ty & Tec	hnical Collec
Value				
7	<b>D</b> C( )	(0/)		
<u>.</u>		` ′	Value	
	14	34	2	
al science technicians	0	24	3	
technicians	0	78	1	
8		<u> </u>		
			Valua	
al ecionos tochnicians				
technicians	0	50	1	
19	Raw Stat	istics (%)		
	Minority	Female	Value	
	18	40	2	
al science technicians	0	61	3	
technicians	11	76	1	
35		<u> </u>		<u> </u>
			V-l	
	al science technicians technicians  8  al science technicians technicians  19  al science technicians technicians technicians		Value	Table   Raw Statics (%)   Minority   Female   Value

Plan Date: 05/01/2020		Bl	ue Ridge	Communi	ty & Tec	hnical (	College
Skilled Crafts							
Factor 1: External Availability							
1050 Computer support specialists			15	0	2		
1965 Miscellaneous life, physical, and social science	e technicia	ns	33	67	3		
3300 Clinical laboratory technologists and technician	ns		0	75	1		
Berkeley+Morgan	165		D C4-4	-4: (0/)			
Census Codes used for RRA			Raw Stati Minority	Female	Value		
1050 Computer support specialists			17	41	2		
1965 Miscellaneous life, physical, and social science	e technicia	ns	0	80	3		
3300 Clinical laboratory technologists and technicia	ns		15	67	1		
			Raw Stati Minority	istics (%) Female	Value	Weighted F Minority	Female
Final Statistics for External Availability			10	60	80	8	48
Factor 2: Internal Availability							
_			Raw Stati	istics (%)			
Source Description			Minority	Female	Value		
Technical and Paraprofessional			0	100	1		
Clerical and Secretarial			6	94	1		
Skilled Crafts			17	0	1		
			Raw Stati	istics (%)		Weighted F	actor (%)
			Minority	Female	Value	Minority	Female
Final Statistics for Internal Availability			8	65	20	2	13

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_				
Serv	/ICe/	/Mai	nter	nance

Factor	Description		<u>atistics</u> Female	Weight	Weighte Minority	<u>d Factor</u> Female	Source of Statistics	Reason for Weighting
1	The percentage of minorities or women with requisite skills in the RRA. The RRA is defined as the geographical area from which the contractor usually seeks or reasonably could seek workers to fill the positions in question.	8	20	85	7	17	2010 Census EEO Special File for appropriate Occupational Titles. See supporting documents.	Reasonable recruiting practices and business necessity. Consideration given to past practices and current demands.
2	The percentage of minorities or women among those promotable, transferable, and trainable within the contractor's organization. Trainable refers to those employees that, with reasonably provided training, become qualified during the AAP year.	33	43	15	5	6	Incumbent work force for those Job Groups that constitute "feeders" to this Job Group.	Reasonable recruiting practices and business necessity. Consideration given to past practices and current demands.
				100				
Job Gro	up Size: 21		Final Avail	ability (%)	12	23		

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vice/Maintenance					
ctor 1: External Availability					
ernal Availability from the RRA					
Census Areas for RRA	Value				
Franklin	7	D St. 4			
Census Codes used for RRA		Raw Stati Minority	Female	Value	
3730 First-line supervisors of protective serv	ice workers, all ot	0	13	1	
3930 Security guards and gaming surveillance of	fficers	13	16	11	
4220 Janitors and building cleaners		1	33	7	
7000 First-line supervisors of mechanics, insta	allers, and repaire	0	0	1	
7610 Helpersinstallation, maintenance, and re	epair workers	0	25	1	
Winchester VA-WV	8	D 6: 1		1	
Census Codes used for RRA		Raw Stati Minority	istics (%) Female	Value	
3730 First-line supervisors of protective serv	ice workers, all ot	0	0	1	
3930 Security guards and gaming surveillance of		18	12	11	
4220 Janitors and building cleaners		14	40	7	
7000 First-line supervisors of mechanics, insta	allers, and repaire	0	0	1	
Hagerstown-Martinsburg MD-WV	19				
Census Codes used for RRA		Raw Stati Minority	istics (%) Female	Value	
3730 First-line supervisors of protective serv	ice workers, all ot	14	35	1	
3930 Security guards and gaming surveillance of	fficers	20	8	11	

Blue Ridge Community & Technical College

Plan Date: 05/01/2020		В	lue Ridge	Communi	ty & Tec	hnical	College
Service/Maintenance							
Factor 1: External Availability							
4220 Janitors and building cleaners			9	30	7		
7000 First-line supervisors of mechanics, installers,	and repai	re	0	0	1		
7610 Helpersinstallation, maintenance, and repair w	orkers		0	29	1		
Jefferson	35		D . 64.4*	(0/)			
Census Codes used for RRA			Raw Stati Minority	Female	Value		
3730 First-line supervisors of protective service wor	kers, all	ot	0	0	1		
3930 Security guards and gaming surveillance officers			15	26	11		
4220 Janitors and building cleaners			26	12	7		
7000 First-line supervisors of mechanics, installers,	and repai	re	31	0	1		
Berkeley+Morgan	165		D . 64.4	(0/)			
Census Codes used for RRA			Raw Stati Minority	Stics (%) Female	Value		
3730 First-line supervisors of protective service wor	kers, all	ot	0	56	1		
3930 Security guards and gaming surveillance officers			8	9	11		
4220 Janitors and building cleaners			2	25	7		
7000 First-line supervisors of mechanics, installers,	and repai	re	0	0	1		
7610 Helpersinstallation, maintenance, and repair w	orkers		0	100	1		
			Raw Stati Minority	istics (%) Female	Value	Weighted I Minority	Factor (%) Female
Final Statistics for External Availability			8	20	85	7	17

Plan Date: 05/01/2020	Bl	ue Ridge	Communi	ty & Tec	hnical (	college
Service/Maintenance						
Factor 2: Internal Availability						
		Raw Stati	istics (%)			
Source Description		Minority	Female	Value		
Service/Maintenance		33	43	1		
		Raw Stat	istics (%)		Weighted F	actor (%)
		Minority	Female	Value	Minority	Female
Final Statistics for Internal Availability		33	43	15	5	6

#### **Placement Goals**

Contractors and subcontractors must compare the percentage of minorities and women in each job group with the availability for those job groups as calculated in this AAP. 41 C.F.R. § 60-2.13 to 60.2.15. When the percentage of minorities or women in a job group is less than would be reasonably expected given their availability, contractors are required to establish placement goals, which also serve as reasonably attainable objectives to measure progress toward achieving equal employment opportunity. 41 C.F.R. § 60-2.16.

Contractors may use a number of methods to determine whether their actual employment percentage of minorities and/or females is lower than would reasonably be expected, including the need to set a placement goal when: 1) there is "any difference" between the availability percentage and the employment percentage; 2) actual employment is less than 80 percent of calculated availability (which is the expected representation); or, 3) the difference between the actual and expected employment is statistically significant. Any reasonable method, as long as it is uniformly applied, is acceptable to the OFCCP.

Placement goals are established as a percentage equal to the calculated availability and serve as objectives or targets reasonably attainable by means of applying every good faith effort to make all aspects of the entire affirmative action program work. 41 C.F.R. § 60-2.16. Although a contractor is required to make good faith efforts to meet its goals, the goals are not allowed under law to be quotas (with the exception of a few circumstances, such as when there is a court order to remedy prior unlawful discrimination.)

#### **Placement Goals**

Plan Date: 05/01/2020

Blue Ridge Community & Technical College

Job Group	Group	Employ	ment (%)	Availab	oility (%)		ent Goals* eded	Annual Goal (%)	
Job Group	Size	Minority	Female	Minority	Female	Minority	Female	Minority	Female
Executive/Administrative/Managerial	13	0	69	15	61	No <sup>1</sup>	No <sup>1</sup>		
Faculty	30	10	80	7	65	No <sup>1</sup>	No <sup>1</sup>		
Instructors/Lecturers	52	4	50	16	65	Yes <sup>1</sup>	Yes <sup>2</sup>	16	65
Adjunct Faculty	153	7	55	0	2	No <sup>1</sup>	No <sup>1</sup>		
Professional Non-Faculty	34	9	85	9	62	No <sup>1</sup>	No <sup>1</sup>		
Clerical and Secretarial	16	6	94	7	91	No <sup>1</sup>	No <sup>1</sup>		
Technical and Paraprofessional	6	0	100	19	57	No <sup>1</sup>	No <sup>1</sup>		
Skilled Crafts	6	17	0	9	61	No <sup>1</sup>	Yes <sup>1</sup>		61
Service/Maintenance	21	33	43	12	23	No <sup>1</sup>	No <sup>1</sup>		

<sup>1 -</sup> Binomial Distribution

\*The establishment of a "Placement Goal" does not amount to an admission of impermissible conduct. It is neither a finding of lawful discrimination nor a finding of a lack of a good faith affirmative action efforts. Nor does the establishment of a Placement Goal permit unlawful discrimination. Rather the establishment of a "Placement Goal" is a technical targeting term used exclusively by affirmative action planners who seek to apply good faith efforts to increase in the future the percentage employment of minorities and women in the workforce.

<sup>2 -</sup> Two Standard Deviations

#### **Progress Toward Goals Report**

Contractors and subcontractors must maintain its current affirmative action plan (AAP) and documentation of good faith efforts, and must preserve its AAP and documentation of good faith efforts for the immediately preceding AAP year. 41 C.F.R. § 60-1.12 (b).

One of the key components to the effective implementation of an AAP is the acknowledgement of progress toward the goals established in the utilization analysis of the preceding year. As such, this is one of the items requested by OFCCP during a routine compliance evaluation.

To compare progress toward goals, the contractor must measure the employment activity that has occurred during the plan year. The variable here is opportunities which are defined by OFCCP as total placements (hires plus promotions) into the job group.

#### **Progress Toward Goals Report**

Date Range: May 1, 2019 through April 30, 2020

Blue Ridge Community & Technical College

	Pri	or Year - 2	019	Prior Year	Goals (%)	Numbe	r of Opportu	nities (#)	Actual P	lacement	Goal	Met?
Job Group	Total	Minority	Female	Minority	Female	Total	Minority	Female	Minority	Female	Minority	Female
Job Group				,			•		%	%		
Executive/Administrative/Managerial	12	0	8	22	N/A	1	0	1	0	100	N	N/A
Faculty	55	2	36	N/A	N/A	31	5	18	16	58	N/A	N/A
Instructors/Lecturers	19	1	8	18	57	7	1	5	14	71	N	Y
Adjunct Faculty	272	16	152	23	N/A	0	0	0			N	N/A
Professional Non-Faculty	31	4	26	N/A	N/A	6	1	6	17	100	N/A	N/A
Clerical and Secretarial	15	1	14	N/A	N/A	6	1	6	17	100	N/A	N/A
Technical and Paraprofessional	8	0	7	14	N/A	1	0	0	0	0	N	N/A
Skilled Crafts	5	1	1	N/A	63	0	0	0			N/A	N
Service/Maintenance	22	6	9	N/A	N/A	12	2	1	17	8	N/A	N/A

In the case where goals were not met, it was due to a limited number of openigns and a lack of qualified applicants. The College will continue to monitor its activity and apply good faith measures designed to alleviate these goals.

#### **Disparity Analysis**

Contractors and subcontractors are required to include personnel activity (applicant flow, hires, terminations, promotions, and any other personnel actions) to determine whether there are selection disparities. 41 C.F.R. § 60-2.17 (b) (2).

The Disparity Analysis is a tool to measure the statistical relationship between two selected groups. The following report identifies whether the rates of those hired, promoted, or terminated are similar without regard to race or gender.

Date Range: May 1, 2019 through April 30, 2020

Blue Ridge Community & Technical College

Executive/Administrative/Managerial											
Non-Favored vs Favored	Total Hires	Total Apps	Total Unknowns	Non- Favored Hires	Non- Favored Apps	Favored Hires	Favored Apps	Non-Favored Selection Rate (%)	Favored Selection Rate (%)	Standard Deviation	Disparity
Male vs Female	1	29	2	0	5	1	24	0.00%	4.17%	0.46	No
Black vs White	1	23	6	0	1	1	22	0.00%	4.55%	0.22	No
Hispanic vs White	1	22	6	0	0 *	1	22	N/A	4.55%	N/A	No
Asian vs White	1	24	6	0	2	1	22	0.00%	4.55%	0.31	No
Am. Indian vs White	1	22	6	0	0 *	1	22	N/A	4.55%	N/A	No
Hawaiian vs White	1	22	6	0	0 *	1	22	N/A	4.55%	N/A	No
Two or More vs White	1	22	6	0	0 *	1	22	N/A	4.55%	N/A	No

<sup>\*</sup> This group does not constitute at least 2% of the total pool.

Date Range: May 1, 2019 through April 30, 2020

Blue Ridge Community & Technical College

Faculty											
Non-Favored vs Favored	Total Hires	Total Apps	Total Unknowns	Non- Favored Hires	Non- Favored Apps	Favored Hires	Favored Apps	Non-Favored Selection Rate (%)	Favored Selection Rate (%)	Standard Deviation	Disparity
Female vs Male	21	143	6	11	92	10	51	11.96%	19.61%	1.24	No
Hispanic vs Black	3	20	16	0	3	3	17	0.00%	17.65%	0.79	No
Asian vs Black	4	19	16	1	2 *	3	17	50.00%	17.65%	-1.06	No
Am. Indian vs Black	3	18	16	0	1 *	3	17	0.00%	17.65%	0.46	No
Hawaiian vs Black	3	17	16	0	0 *	3	17	N/A	17.65%	N/A	No
Two or More vs Black	3	17	16	0	0 *	3	17	N/A	17.65%	N/A	No
White vs Black	20	127	16	17	110	3	17	15.45%	17.65%	0.23	No

<sup>\*</sup> This group does not constitute at least 2% of the total pool.

Date Range: May 1, 2019 through April 30, 2020

Blue Ridge Community & Technical College

Instructors/Lecturers											
Non-Favored vs Favored	Total Hires	Total Apps	Total Unknowns	Non- Favored Hires	Non- Favored Apps	Favored Hires	Favored Apps	Non-Favored Selection Rate (%)	Favored Selection Rate (%)	Standard Deviation	Disparity
Male vs Female	4	21	0	2	14	2	7	14.29%	28.57%	0.79	No
Black vs Asian	1	4	2	0	2	1	2	0.00%	50.00%	1.15	No
Hispanic vs Asian	1	2	2	0	0 *	1	2	N/A	50.00%	N/A	No
Am. Indian vs Asian	1	2	2	0	0 *	1	2	N/A	50.00%	N/A	No
Hawaiian vs Asian	1	2	2	0	0 *	1	2	N/A	50.00%	N/A	No
Two or More vs Asian	1	2	2	0	0 *	1	2	N/A	50.00%	N/A	No
White vs Asian	4	17	2	3	15	1	2	20.00%	50.00%	0.94	No

<sup>\*</sup> This group does not constitute at least 2% of the total pool.

Date Range: May 1, 2019 through April 30, 2020

Blue Ridge Community & Technical College

Professional Non-Faculty											
Non-Favored vs Favored	Total Hires	Total Apps	Total Unknowns	Non- Favored Hires	Non- Favored Apps	Favored Hires	Favored Apps	Non-Favored Selection Rate (%)	Favored Selection Rate (%)	Standard Deviation	Disparity
Male vs Female	6	184	4	0	63	6	121	0.00%	4.96%	1.80	No
Hispanic vs Black	1	26	18	0	6	1	20	0.00%	5.00%	0.56	No
Asian vs Black	1	21	18	0	1 *	1	20	0.00%	5.00%	0.23	No
Am. Indian vs Black	1	21	18	0	1 *	1	20	0.00%	5.00%	0.23	No
Hawaiian vs Black	1	20	18	0	0 *	1	20	N/A	5.00%	N/A	No
Two or More vs Black	1	20	18	0	0 *	1	20	N/A	5.00%	N/A	No
White vs Black	6	162	18	5	142	1	20	3.52%	5.00%	0.33	No

<sup>\*</sup> This group does not constitute at least 2% of the total pool.

Date Range: May 1, 2019 through April 30, 2020

Blue Ridge Community & Technical College

Clerical and Secretarial											
Non-Favored vs Favored	Total Hires	Total Apps	Total Unknowns	Non- Favored Hires	Non- Favored Apps	Favored Hires	Favored Apps	Non-Favored Selection Rate (%)	Favored Selection Rate (%)	Standard Deviation	Disparity
Male vs Female	4	131	0	0	18	4	113	0.00%	3.54%	0.81	No
Hispanic vs Black	1	8	6	0	1 *	1	7	0.00%	14.29%	0.40	No
Asian vs Black	1	7	6	0	0 *	1	7	N/A	14.29%	N/A	No
Am. Indian vs Black	1	7	6	0	0 *	1	7	N/A	14.29%	N/A	No
Hawaiian vs Black	1	8	6	0	1 *	1	7	0.00%	14.29%	0.40	No
Two or More vs Black	1	7	6	0	0 *	1	7	N/A	14.29%	N/A	No
White vs Black	4	123	6	3	116	1	7	2.59%	14.29%	1.69	No

<sup>\*</sup> This group does not constitute at least 2% of the total pool.

Date Range: May 1, 2019 through April 30, 2020

Blue Ridge Community & Technical College

Technical and Paraprofessional											
Non-Favored vs Favored	Total Hires	Total Apps	Total Unknowns	Non- Favored Hires	Non- Favored Apps	Favored Hires	Favored Apps	Non-Favored Selection Rate (%)	Favored Selection Rate (%)	Standard Deviation	Disparity
Female vs Male	1	54	1	0	15	1	39	0.00%	2.56%	0.63	No
Black vs White	1	43	7	0	1	1	42	0.00%	2.38%	0.16	No
Hispanic vs White	1	45	7	0	3	1	42	0.00%	2.38%	0.27	No
Asian vs White	1	44	7	0	2	1	42	0.00%	2.38%	0.22	No
Am. Indian vs White	1	42	7	0	0 *	1	42	N/A	2.38%	N/A	No
Hawaiian vs White	1	42	7	0	0 *	1	42	N/A	2.38%	N/A	No
Two or More vs White	1	42	7	0	0 *	1	42	N/A	2.38%	N/A	No

<sup>\*</sup> This group does not constitute at least 2% of the total pool.

## Disparity Analysis - Hires

Date Range: May 1, 2019 through April 30, 2020

Blue Ridge Community & Technical College

Service/Maintenance											
Non-Favored vs Favored	Total Hires	Total Apps	Total Unknowns	Non- Favored Hires	Non- Favored Apps	Favored Hires	Favored Apps	Non-Favored Selection Rate (%)	Favored Selection Rate (%)	Standard Deviation	Disparity
Female vs Male	12	76	0	1	16	11	60	6.25%	18.33%	1.18	No
Black vs White	11	71	2	1	10	10	61	10.00%	16.39%	0.52	No
Hispanic vs White	10	61	2	0	0 *	10	61	N/A	16.39%	N/A	No
Asian vs White	11	62	2	1	1 *	10	61	100.00%	16.39%	-2.17	No
Am. Indian vs White	10	63	2	0	2	10	61	0.00%	16.39%	0.62	No
Hawaiian vs White	10	61	2	0	0 *	10	61	N/A	16.39%	N/A	No
Two or More vs White	10	61	2	0	0 *	10	61	N/A	16.39%	N/A	No

Standard Deviation will trigger a flag when the result is larger than two standard deviations.

<sup>\*</sup> This group does not constitute at least 2% of the total pool.

Date Range: May 1, 2019 through April 30, 2020

Blue Ridge Community & Technical College

Faculty										
Non-Favored vs Favored	Total Proms	Total Pool	Non- Favored Proms	Non- Favored Pool	Favored Proms	Favored Pool	Non-Favored Selection Rate (%)	Favored Selection Rate (%)	Standard Deviation	Disparity
Male vs Female	3	55	0	19	3	36	0.00%	8.33%	1.29	No
Black vs White	3	54	0	1 *	3	53	0.00%	5.66%	0.24	No
Hispanic vs White	3	54	0	1 *	3	53	0.00%	5.66%	0.24	No
Asian vs White	3	53	0	0 *	3	53	N/A	5.66%	N/A	No
Am. Indian vs White	3	53	0	0 *	3	53	N/A	5.66%	N/A	No
Hawaiian vs White	3	53	0	0 *	3	53	N/A	5.66%	N/A	No
Two or More vs White	3	53	0	0 *	3	53	N/A	5.66%	N/A	No

Standard Deviation will trigger a flag when the result is larger than two standard deviations.

<sup>\*</sup> This group does not constitute at least 2% of the total pool.

Date Range: May 1, 2019 through April 30, 2020

Blue Ridge Community & Technical College

Instructors/Lecturers										
Non-Favored vs Favored	Total Proms	Total Pool	Non- Favored Proms	Non- Favored Pool	Favored Proms	Favored Pool	Non-Favored Selection Rate (%)	Favored Selection Rate (%)	Standard Deviation	Disparity
Male vs Female	5	19	1	11	4	8	9.09%	50.00%	2.00	Yes
Black vs White	5	19	0	1	5	18	0.00%	27.78%	0.61	No
Hispanic vs White	5	18	0	0 *	5	18	N/A	27.78%	N/A	No
Asian vs White	5	18	0	0 *	5	18	N/A	27.78%	N/A	No
Am. Indian vs White	5	18	0	0 *	5	18	N/A	27.78%	N/A	No
Hawaiian vs White	5	18	0	0 *	5	18	N/A	27.78%	N/A	No
Two or More vs White	5	18	0	0 *	5	18	N/A	27.78%	N/A	No

Standard Deviation will trigger a flag when the result is larger than two standard deviations.

<sup>\*</sup> This group does not constitute at least 2% of the total pool.

Date Range: May 1, 2019 through April 30, 2020

Blue Ridge Community & Technical College

Professional Non-Faculty										
Non-Favored vs Favored	Total Proms	Total Pool	Non- Favored Proms	Non- Favored Pool	Favored Proms	Favored Pool	Non-Favored Selection Rate (%)	Favored Selection Rate (%)	Standard Deviation	Disparity
Male vs Female	3	31	0	5	3	26	0.00%	11.54%	0.80	No
Hispanic vs Black	1	4	0	2	1	2	0.00%	50.00%	1.15	No
Asian vs Black	1	2	0	0 *	1	2	N/A	50.00%	N/A	No
Am. Indian vs Black	1	2	0	0 *	1	2	N/A	50.00%	N/A	No
Hawaiian vs Black	1	2	0	0 *	1	2	N/A	50.00%	N/A	No
Two or More vs Black	1	2	0	0 *	1	2	N/A	50.00%	N/A	No
White vs Black	3	29	2	27	1	2	7.41%	50.00%	1.91	No

Standard Deviation will trigger a flag when the result is larger than two standard deviations.

<sup>\*</sup> This group does not constitute at least 2% of the total pool.

Date Range: May 1, 2019 through April 30, 2020

Blue Ridge Community & Technical College

Clerical and Secretarial										
Non-Favored vs Favored	Total Proms	Total Pool	Non- Favored Proms	Non- Favored Pool	Favored Proms	Favored Pool	Non-Favored Selection Rate (%)	Favored Selection Rate (%)	Standard Deviation	Disparity
Female vs Male	1	15	0	14	1	1	0.00%	100.00%	3.87	Yes
Black vs White	1	15	0	1	1	14	0.00%	7.14%	0.28	No
Hispanic vs White	1	14	0	0 *	1	14	N/A	7.14%	N/A	No
Asian vs White	1	14	0	0 *	1	14	N/A	7.14%	N/A	No
Am. Indian vs White	1	14	0	0 *	1	14	N/A	7.14%	N/A	No
Hawaiian vs White	1	14	0	0 *	1	14	N/A	7.14%	N/A	No
Two or More vs White	1	14	0	0 *	1	14	N/A	7.14%	N/A	No

Standard Deviation will trigger a flag when the result is larger than two standard deviations.

<sup>\*</sup> This group does not constitute at least 2% of the total pool.

Date Range: May 1, 2019 through April 30, 2020

Blue Ridge Community & Technical College

Technical and Paraprofessional										
Non-Favored vs Favored	Total Proms	Total Pool	Non- Favored Proms	Non- Favored Pool	Favored Proms	Favored Pool	Non-Favored Selection Rate (%)	Favored Selection Rate (%)	Standard Deviation	Disparity
Female vs Male	3	8	2	7	1	1	28.57%	100.00%	1.38	No
Black vs White	3	8	0	0 *	3	8	N/A	37.50%	N/A	No
Hispanic vs White	3	8	0	0 *	3	8	N/A	37.50%	N/A	No
Asian vs White	3	8	0	0 *	3	8	N/A	37.50%	N/A	No
Am. Indian vs White	3	8	0	0 *	3	8	N/A	37.50%	N/A	No
Hawaiian vs White	3	8	0	0 *	3	8	N/A	37.50%	N/A	No
Two or More vs White	3	8	0	0 *	3	8	N/A	37.50%	N/A	No

Standard Deviation will trigger a flag when the result is larger than two standard deviations.

<sup>\*</sup> This group does not constitute at least 2% of the total pool.

Date Range: May 1, 2019 through April 30, 2020

Blue Ridge Community & Technical College

Executive/Administrative/Managerial										
Non-Favored vs Favored	Total Terms	Total Pool	Non- Favored Terms	Non- Favored Pool	Favored Terms	Favored Pool	Non-Favored Selection Rate (%)	Favored Selection Rate (%)	Standard Deviation	Disparity
Female vs Male	1	12	1	8	0	4	12.50%	0.00%	0.74	No
Black vs White	1	12	0	0 *	1	12	N/A	8.33%	N/A	No
Hispanic vs White	1	12	0	0 *	1	12	N/A	8.33%	N/A	No
Asian vs White	1	12	0	0 *	1	12	N/A	8.33%	N/A	No
Am. Indian vs White	1	12	0	0 *	1	12	N/A	8.33%	N/A	No
Hawaiian vs White	1	12	0	0 *	1	12	N/A	8.33%	N/A	No
Two or More vs White	1	12	0	0 *	1	12	N/A	8.33%	N/A	No

Standard Deviation will trigger a flag when the result is larger than two standard deviations.

<sup>\*</sup> This group does not constitute at least 2% of the total pool.

Date Range: May 1, 2019 through April 30, 2020

Blue Ridge Community & Technical College

Faculty										
Non-Favored vs Favored	Total Terms	Total Pool	Non- Favored Terms	Non- Favored Pool	Favored Terms	Favored Pool	Non-Favored Selection Rate (%)	Favored Selection Rate (%)	Standard Deviation	Disparity
Male vs Female	3	55	3	19	0	36	15.79%	0.00%	2.45	Yes
Black vs White	3	54	0	1 *	3	53	0.00%	5.66%	N/A	No
Hispanic vs White	3	54	0	1 *	3	53	0.00%	5.66%	N/A	No
Asian vs White	3	53	0	0 *	3	53	N/A	5.66%	N/A	No
Am. Indian vs White	3	53	0	0 *	3	53	N/A	5.66%	N/A	No
Hawaiian vs White	3	53	0	0 *	3	53	N/A	5.66%	N/A	No
Two or More vs White	3	53	0	0 *	3	53	N/A	5.66%	N/A	No

Standard Deviation will trigger a flag when the result is larger than two standard deviations.

<sup>\*</sup> This group does not constitute at least 2% of the total pool.

Date Range: May 1, 2019 through April 30, 2020

Blue Ridge Community & Technical College

Instructors/Lecturers			No.	Non-			Non-Favored	Favored		
Non-Favored vs Favored	Total Terms	Total Pool	Non- Favored Terms	Favored Pool	Favored Terms	Favored Pool	Selection Rate (%)	Selection Rate (%)	Standard Deviation	Disparity
Female vs Male	12	19	7	8	5	11	87.50%	45.45%	1.88	No
Black vs White	11	19	1	1	10	18	100.00%	55.56%	0.88	No
Hispanic vs White	10	18	0	0 *	10	18	N/A	55.56%	N/A	No
Asian vs White	11	18	1	0 *	10	18	N/A	55.56%	N/A	No
Am. Indian vs White	10	18	0	0 *	10	18	N/A	55.56%	N/A	No
Hawaiian vs White	10	18	0	0 *	10	18	N/A	55.56%	N/A	No
Two or More vs White	10	18	0	0 *	10	18	N/A	55.56%	N/A	No

Standard Deviation will trigger a flag when the result is larger than two standard deviations.

<sup>\*</sup> This group does not constitute at least 2% of the total pool.

Date Range: May 1, 2019 through April 30, 2020

Blue Ridge Community & Technical College

Professional Non-Faculty										
Non-Favored vs Favored	Total Terms	Total Pool	Non- Favored Terms	Non- Favored Pool	Favored Terms	Favored Pool	Non-Favored Selection Rate (%)	Favored Selection Rate (%)	Standard Deviation	Disparity
Male vs Female	2	31	1	5	1	26	20.00%	3.85%	1.35	No
Black vs Hispanic	0	4	0	2	0	2	0.00%	0.00%	N/A	No
Asian vs Hispanic	0	2	0	0 *	0	2	N/A	0.00%	N/A	No
Am. Indian vs Hispanic	0	2	0	0 *	0	2	N/A	0.00%	N/A	No
Hawaiian vs Hispanic	0	2	0	0 *	0	2	N/A	0.00%	N/A	No
Two or More vs Hispanic	0	2	0	0 *	0	2	N/A	0.00%	N/A	No
White vs Hispanic	2	29	2	27	0	2	7.41%	0.00%	0.40	No

Standard Deviation will trigger a flag when the result is larger than two standard deviations.

<sup>\*</sup> This group does not constitute at least 2% of the total pool.

Date Range: May 1, 2019 through April 30, 2020

Blue Ridge Community & Technical College

Clerical and Secretarial										
Non-Favored vs Favored	Total Terms	Total Pool	Non- Favored Terms	Non- Favored Pool	Favored Terms	Favored Pool	Non-Favored Selection Rate (%)	Favored Selection Rate (%)	Standard Deviation	Disparity
Female vs Male	2	15	2	14	0	1	14.29%	0.00%	0.41	No
Hispanic vs Black	0	1	0	0 *	0	1	N/A	0.00%	N/A	No
Asian vs Black	0	1	0	0 *	0	1	N/A	0.00%	N/A	No
Am. Indian vs Black	0	1	0	0 *	0	1	N/A	0.00%	N/A	No
Hawaiian vs Black	0	1	0	0 *	0	1	N/A	0.00%	N/A	No
Two or More vs Black	0	1	0	0 *	0	1	N/A	0.00%	N/A	No
White vs Black	2	15	2	14	0	1	14.29%	0.00%	0.41	No

Standard Deviation will trigger a flag when the result is larger than two standard deviations.

<sup>\*</sup> This group does not constitute at least 2% of the total pool.

Date Range: May 1, 2019 through April 30, 2020

Blue Ridge Community & Technical College

Skilled Crafts								_		
Non-Favored vs Favored	Total Terms	Total Pool	Non- Favored Terms	Non- Favored Pool	Favored Terms	Favored Pool	Non-Favored Selection Rate (%)	Favored Selection Rate (%)	Standard Deviation	Disparity
Male vs Female	1	5	1	4	0	1	25.00%	0.00%	0.56	No
Black vs Hispanic	0	1	0	0 *	0	1	N/A	0.00%	N/A	No
Asian vs Hispanic	0	1	0	0 *	0	1	N/A	0.00%	N/A	No
Am. Indian vs Hispanic	0	1	0	0 *	0	1	N/A	0.00%	N/A	No
Hawaiian vs Hispanic	0	1	0	0 *	0	1	N/A	0.00%	N/A	No
Two or More vs Hispanic	0	1	0	0 *	0	1	N/A	0.00%	N/A	No
White vs Hispanic	1	5	1	4	0	1	25.00%	0.00%	0.56	No

Standard Deviation will trigger a flag when the result is larger than two standard deviations.

<sup>\*</sup> This group does not constitute at least 2% of the total pool.

Date Range: May 1, 2019 through April 30, 2020

Blue Ridge Community & Technical College

Service/Maintenance			Non-	Non-			Non-Favored	Favored		
Non-Favored vs Favored	Total Terms	Total Pool	Favored Terms	Favored Pool	Favored Terms	Favored Pool	Selection Rate (%)	Selection Rate (%)	Standard Deviation	Disparity
Male vs Female	8	22	7	13	1	9	53.85%	11.11%	2.05	Yes
Black vs Hispanic	0	4	0	3	0	1	0.00%	0.00%	N/A	No
Asian vs Hispanic	0	3	0	2	0	1	0.00%	0.00%	N/A	No
Am. Indian vs Hispanic	0	1	0	0 *	0	1	N/A	0.00%	N/A	No
Hawaiian vs Hispanic	0	1	0	0 *	0	1	N/A	0.00%	N/A	No
Two or More vs Hispanic	0	1	0	0 *	0	1	N/A	0.00%	N/A	No
White vs Hispanic	8	17	8	16	0	1	50.00%	0.00%	0.97	No

Standard Deviation will trigger a flag when the result is larger than two standard deviations.

<sup>\*</sup> This group does not constitute at least 2% of the total pool.

# Affirmative Action Program for Protected Veterans

## **Blue Ridge Community & Technical College**

# **Affirmative Action Program For Protected Veterans**

May 1, 2020 through April 30, 2021 Plan Year

### CONFIDENTIAL, TRADE SECRET, AND PRIVATE MATERIAL

This Affirmative Action Plan contains confidential, trade secret, commercial, and private information of Blue Ridge CTC which is protected from disclosure by the Office of Federal Contract Compliance Programs pursuant to the Trade Secrets Act, 18 U.S.C. § 1905. The release of this information could cause substantial harm to Blue Ridge CTC or its employees within the meaning of the Freedom of Information Act ("FOIA"), 5 U.S.C. §§ 552 (b)(3), (4), (6) and (7) and the Trade Secrets Act. FOIA protects information in this document from mandatory disclosure to FOIA requestors. See, e.g., *Chrysler v. Brown*, 441 U.S. 281 (1979). Furthermore, release of any trade secret, confidential statistical or commercial information would be arbitrary and capricious in violation of the Administrative Procedure Act. See, e.g., *CNA Financial Corp. v. Donovan*, 830 F.2d 1132, 1144 (D.C. Cir.), cert. denied, 485 U.S. 977 (1988).

## **Blue Ridge Community & Technical College**

### AFFIRMATIVE ACTION PLAN FOR PROTECTED VETERANS

May 1, 2020 through April 30, 2021 PLAN YEAR

AAP Approved by	•
	Dr. Peter Checkovich
	President
AAP Prepared and	Annroyed by
AAI TTepareu and	== *
	Morgan Gower
	FFO Administrator

## **Blue Ridge Community & Technical College**

# AFFIRMATIVE ACTION PROGRAM FOR PROTECTED VETERANS

May 1, 2020 through April 30, 2021 Plan Year

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#### Introduction

Blue Ridge Community & Technical College (Blue Ridge CTC) sets forth this affirmative action program ("AAP") for the year from May 1, 2020 through April 30, 2021, reaffirming its commitment to the spirit and letter of affirmative action law. Through the implementation of this plan Blue Ridge CTC continues its efforts to comply with appropriate government regulations and to make the best possible use of personnel while contributing to the betterment of society and the community.

In developing this AAP, Blue Ridge CTC recognizes its duty to ensure equal employment opportunity. The following statement of policy reinforces that belief.

# Equal Employment Opportunity Policy Statement 41 C.F.R. § 60-300.44(a)

In setting forth this plan Blue Ridge CTC reaffirms its belief and commitment in equal employment opportunity for all employees and applicants for employment in all terms and conditions of employment. Morgan Gower, as the EEO Administrator, oversees the plan development, modification, implementation, and reporting requirements and conducts management updates. Blue Ridge CTC's [top U.S. executive, such as its CEO or Chief of its U.S. division of a foreign University] supports Blue Ridge CTC's AAP.

Blue Ridge CTC provides for an audit and reporting system regarding Blue Ridge CTC's affirmative action responsibilities under the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended ("VEVRAA") regulations, and assigns overall responsibility for the implementation of affirmative action responsibilities under these regulations.

Blue Ridge CTC recruits, hires, trains and promotes persons in all job titles, and ensures that all personnel actions are administered without regard to protected veteran status; and ensures that all employment actions are based only on valid job requirements. Blue Ridge CTC's employees and applicants are not subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in any of the following activities:

- 1. filing a complaint with Blue Ridge CTC or with Federal, state, or local agencies regarding the status covered under this AAP;
- 2. assisting or participating in any investigation, compliance review, hearing, or any other activity related to the administration of any Federal, State, or local requiring equal employment opportunity for protected veterans;
- 3. opposing any act or practice made unlawful by Section 503 or its implementing regulation, or any other Federal, State or local law requiring equal opportunity for protected veterans; or
- 4. exercising any other right protected by VEVRAA or its implementing regulations.

Blue Ridge CTC's full AAP, absent the data metrics required by 41 CFR § 60-300.44(k), is available for inspection upon request at the location and during the hours that are posted at Blue Ridge CTC's establishment [or during regular working hours] at Blue Ridge CTC's Human Resources Office.

**Definitions.** For the purposes of this AAP, the term "Protected Veteran" shall be defined as follows, according to the VEVRAA regulations:

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

<u>Armed Forces Service Medal Veteran</u> means any veteran who, while serving on active duty in the U.S. military, ground, naval, or air service, participated in a United States military operation to which an Armed Forces service medal was awarded pursuant to Executive Order 12985.

#### <u>Disabled Veteran</u> means:

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

<u>Protected Veteran</u> means a veteran who is protected under the non-discrimination and affirmative action provisions of VEVRAA; specifically, a veteran who may be classified as a "disabled veteran," "recently-separated veteran," "active duty wartime or campaign badge veteran," and/or an "Armed Forces Service Medal Veteran" as defined by this AAP and VEVRAA.

<u>Recently-Separated Veteran</u> means any veteran during the three-year period beginning on the date of such veteran's discharge or release from active duty in the U.S. military, ground, naval, or air service.

Pre-JVA veterans are those who would be protected by 41 C.F.R. Part 250 if it were not rescinded, but would not be protected under 41 C.F.R. Part 300.

#### **Review of Personnel Processes**

#### 41 C.F.R. § 300.44(b)

- 1. Blue Ridge CTC ensures its personnel processes provide for careful, thorough, and systematic consideration of the job qualifications of applicants and employees who are known protected veterans for job vacancies filled either by hiring or promotion, and for all training opportunities offered or available.
- 2. Blue Ridge CTC also ensures that when a protected veteran is considered for employment opportunities, Blue Ridge CTC relies only on that portion of the individual's military record, including his or her discharge papers, relevant to the requirements of the opportunity in issue.
- 3. Blue Ridge CTC ensures that its personnel processes do not stereotype protected veterans in a manner which limits their access to all jobs for which they are qualified.
- 4. Blue Ridge CTC periodically reviews such processes and makes any necessary modifications to ensure that these obligations are carried out. A description of the review and any necessary modifications to personnel processes or development of new processes is included in this AAP.
- 5. Blue Ridge CTC designs procedures that facilitate a review of the implementation of this requirement by Blue Ridge CTC and the Government. The procedures Blue Ridge CTC uses are as follows:
  - a. the application or personnel form of each known applicant who is a protected veteran is annotated to identify each vacancy for which the applicant was considered, and the form will be quickly retrievable for review by the Department of Labor and Blue Ridge CTC's personnel officials for use in investigations and internal compliance activities.
  - b. The personnel or application records of each known protected veteran includes (i) the identification of each promotion for which the protected veteran was considered, and (ii) the identification of each training program for which the protected veteran was considered.
  - c. In each case where an employee or applicant who is a protected veteran is rejected for employment, promotion, or training, Blue Ridge CTC prepares a statement of the reason as well as a description of the accommodations considered (for a rejected disabled veteran). The statement of the reason for rejection (if the reason is medically related), and the description of the accommodations considered, is treated as confidential medical records in accordance with § 60-300.23(d). These materials are available to the applicant or employee concerned upon request.
  - d. Where applicants or employees are selected for hire, promotion, or training and Blue Ridge CTC undertakes any accommodation which makes it possible for it to place a disabled veteran on the job, Blue Ridge CTC makes a record containing a

description of the accommodation. The record is treated as a confidential medical record in accordance with § 60-300.23(d).

# Physical and Mental Job Qualifications 41 C.F.R. § 300.23 and 44(c)

- 1. Blue Ridge CTC adheres to a schedule for the periodic review of all physical and mental job qualification standards to ensure that, to the extent qualification standards tend to screen out qualified disabled veterans, they are job-related for the position and are consistent with job necessity.
- 2. Whenever Blue Ridge CTC applies physical or mental qualification standards in the selection of applicants of employees for employment or other change in employment status such as promotion, demotion or training, to the extent that qualification standards tend to screen out qualified disabled veterans, the standards shall be related to the specific job or jobs for which the individual is being considered and consistent with business necessity. Blue Ridge CTC reviews its job descriptions and qualifications to ensure they accurately reflect job duties and responsibilities. The schedule is as follows annually; as new job qualifications are established; and/or, when new equipment is installed.
- 3. No pre-employment physical examinations or questionnaires are used by Blue Ridge CTC prior to a job offer contingent on such examinations and other requirements.
- 4. Blue Ridge CTC may use as a defense to a violation of its obligations in Paragraph 2 above that an individual poses a direct threat to the health or safety of the individual or others in the workplace.
- 5. When Blue Ridge CTC conducts a medical examination or inquiry of a protected veteran it will do so according to the terms and conditions of the VEVRAA and Section 503 regulations, and the results of such an examination or inquiry are kept confidential according to federal regulations, which includes the following exceptions:
  - a. Supervisors and managers may be informed regarding restrictions on the work or duties of the applicant or employee and necessary accommodations;
  - b. First aid and safety personnel may be informed, when appropriate, if the disability might require emergency treatment; and,
  - c. Government officials engaged in enforcing the laws administered by the OFCCP regarding individuals with disabilities or protected veterans, or enforcing The Americans with Disabilities Act ("ADA") and The Americans with Disabilities Act Amendment Act of 2008 ("ADAAA"), shall be provided relevant information on request.

#### **Reasonable Accommodation**

#### 41 C.F.R. § 41 C.F.R. §60-300.44(d)

- 1. It is Blue Ridge CTC's policy as a matter of nondiscrimination to make reasonable accommodation to the known physical and mental limitations of all otherwise qualified disabled veterans unless it can demonstrate that the accommodation would impose an undue hardship on Blue Ridge CTC's business, in accordance with the terms and conditions of Section 503 regulations. Undue hardship will be determined by its definition under applicable regulations under Section 503 including, but not limited to the following: Undue hardship means, with respect to the provision of an accommodation, significant difficulty or expense incurred by the contractor, when considered in light of the factors set forth in 41 CFR § 741.2 (aa)(2), such as the overall financial resources of the facility and the impact of the accommodation upon the operation of the facility (this is not an all-inclusive list).
- 2. As a matter of affirmative action, if an employee who is known to be a disabled veteran is having significant difficulty performing his or her job and it is reasonable to conclude that the performance problem may be related to the known disability, Blue Ridge CTC confidentially notifies the employee of the performance problem and inquires whether the problem is related to the employee's disability.
- 3. If the employee responds affirmatively, Blue Ridge CTC confidentially inquires whether the employee is in need of a reasonable accommodation.

# Anti-Harassment Procedures 41 C.F.R. § 60-300.44(e)

Blue Ridge CTC has developed and implemented procedures to ensure its employees are not harassed because of their status as a protected veteran.

# External Dissemination of Policy, Outreach, and Positive Recruitment 41 C.F.R. § 300.44(f)

- 1. Blue Ridge CTC sends written notification of its policy related to affirmative action efforts to all subcontractors, including subcontracting vendors and suppliers, requesting appropriate action on their part.
- 2. Blue Ridge CTC undertakes appropriate outreach and positive recruitment activities such as some of those listed below that are reasonably designed to effectively recruit protected veterans. It is not contemplated that Blue Ridge CTC will necessarily undertake all the activities listed below or that its activities will be limited to the items listed below. The scope of Blue Ridge CTC's efforts shall depend upon all circumstances, including Blue Ridge CTC's size and resources and the extent to which existing employment practices are adequate.
  - a. Enlisting the assistance and support of the following persons and organizations in recruiting, and developing on-the-job training opportunities for veterans, in order to fulfill its commitment to provide meaningful employment opportunities for such veterans:
    - i. The Local Veterans' Employment Representative in the local employment service office (i.e. the One-Stop) nearest Blue Ridge CTC's establishment;
    - ii. The Department of Veterans Affairs Regional Office nearest Blue Ridge CTC's establishment;
    - iii. The veterans' counselors and coordinators ("Vet-Reps") on college campuses;
    - iv. The service officers of the national veterans' groups active in the area of Blue Ridge CTC's establishment;
    - v. Local veterans' groups and veterans' service centers near Blue Ridge CTC's establishment;
    - vi. The Department of Defense Transition Assistance Program (TAP), or any subsequent program that, in whole or in part, might replace TAP; and
    - vii. Any organization listed in the Employer Resources section of the National Resource Directory (<a href="http://www.nationalresourcedirectory.gov/">http://www.nationalresourcedirectory.gov/</a>), or any future service that replaces or complements it.
  - b. Blue Ridge CTC also considers taking the actions listed below, as appropriate, to fulfill its commitment to provide meaningful employment opportunities to protected veterans:
    - i. Formal briefing sessions should be held, preferably on Blue Ridge CTC's premises, with representatives from recruiting sources.

- ii. Blue Ridge CTC's facility tours, clear and concise explanations of current and future job openings, position descriptions, worker specifications, explanations of the institution's selection process, and recruiting literature are an integral part of the briefing. At any such briefing sessions, the Blue Ridge CTC official in charge of its affirmative action program is in attendance when possible. Formal arrangements should be made for referral of applicants, follow up with sources, and feedback on disposition of applicants.
- iii. Blue Ridge CTC's recruitment efforts at all educational institutions incorporate special efforts to reach students who are protected veterans.
- iv. An effort is made to participate in work-study programs with Department of Veterans Affairs rehabilitation facilities which specialize in training or educating disabled veterans.
- v. Protected veterans are made available for participation in career days, youth motivation programs, and related activities in their communities.
- vi. Blue Ridge CTC takes any other positive steps it deems necessary to attract qualified protected veterans not currently in the work force who have requisite skills and can be recruited through affirmative action measures. These persons may be located through the local chapters of organizations of and for any of the classifications of protected veterans.
- vii. Blue Ridge CTC, in making hiring decisions, considers applicants who are known protected veterans for all available positions for which they may be qualified when the position(s) applied for is unavailable.
- viii. Blue Ridge CTC considers listing its job openings with the National Resource Directory's Veterans Job Bank, or any future service that replaces or complements it.
- 3. **Assessment of external outreach and recruitment efforts.** Blue Ridge CTC, on an annual basis, reviews the outreach and recruitment efforts it has taken over the previous twelve months to evaluate their effectiveness in identifying and recruiting qualified protected veterans. Blue Ridge CTC documents each evaluation, including at a minimum the criteria it used to evaluate the effectiveness of each effort and Blue Ridge CTC's conclusion as to whether each effort was effective. Among these criteria shall be the data collected pursuant to 41 C.F.R. § 60-300.44(k) for the current year and the two most recent previous years. If Blue Ridge CTC concludes the totality of its efforts were not effective in identifying and recruiting qualified protected veterans, it shall identify and implement alternative efforts listed in paragraphs (f)(1) or (f)(2) of this section in order to fulfill its obligations.
- 4. **Recordkeeping obligation.** Blue Ridge CTC documents all activities it undertakes to comply with the obligations of this section, and retain these documents for a period of three (3) years.

#### **Internal Dissemination of Policy**

### C.F.R. § 60-300.44(g)

- 1. Blue Ridge CTC recognizes that a strong outreach program will be ineffective without adequate internal support from supervisory and management personnel and other employees.
- 2. Blue Ridge CTC implements and disseminates this policy internally as follows:
  - a. includes it in Blue Ridge CTC's policy manual or otherwise make the policy available to employees; and
  - b. if Blue Ridge CTC is party to a collective bargaining agreement, it notifies union officials and/or employee representatives to inform them of Blue Ridge CTC's policy, and request their cooperation.
- 3. Further, in order to assure greater employee cooperation and participation in Blue Ridge CTC's efforts, Blue Ridge CTC has developed the internal procedures listed in this section of the AAP for communication of its obligation to engage in affirmative action efforts to employ and advance in employment qualified protected veterans. It is not contemplated that Blue Ridge CTC's activities will be limited to those listed. These procedures shall be designed to foster understanding, acceptance and support among Blue Ridge CTC's executive, management, supervisory and other employees and to encourage such persons to take the necessary actions to aid Blue Ridge CTC in meeting this obligation. Blue Ridge CTC additionally considers implementing and disseminating this policy internally as follows:
  - a. Informing all employees and prospective employees of its commitment to engage in affirmative action to increase employment opportunities for protected veterans;
  - b. Publicizing it in Blue Ridge CTC's newspaper, magazine, annual report and other media;
  - c. Conducting special meetings with executive, management, and supervisory personnel to explain the intent of the policy and individual responsibility for effective implementation, making clear the chief executive officer's support for the affirmative action policy;
  - d. Discussing the policy thoroughly in both employee orientation and management training programs; and
  - e. When employees are featured in employee handbooks or similar publications for employees, including disabled veterans.

#### **Audit and Reporting System**

#### C.F.R. § 60-300.44(h)

- 1. Blue Ridge CTC has designed and implemented an audit and reporting system that:
  - a. Measures the effectiveness of Blue Ridge CTC's AAP;
  - b. Indicates any need for remedial action;
  - c. Determines the degree to which Blue Ridge CTC's objectives have been attained;
  - d. Determines whether known protected veterans have had the opportunity to participate in all of Blue Ridge CTC 's sponsored educational, training, recreational and social activities;
  - e. Measures Blue Ridge CTC 's compliance with the AAP's specific obligations; and
  - f. Documents the actions taken to comply with the obligations of paragraphs (i) through (v) above, and retain these documents as employment records for three years subject to the recordkeeping requirements of § 60-300.80.
- 2. Where the affirmative action program is found to be deficient, Blue Ridge CTC undertakes necessary action to bring the program into compliance.

### **Responsibility for Implementation of the Plan**

1. Identification and Responsibilities of EEO/AA Administrator 41 C.F.R. § 60-250.44(i); 41 C.F.R. § 60-300.44(i)

In furtherance of Blue Ridge CTC's commitment to Affirmative Action and Equal Employment Opportunity, overall responsibility for implementing Blue Ridge CTC's AAP rests with its EEO/AA Administrator, whose identity should appear on all internal and external communications regarding Blue Ridge CTC's AAP. The EEO/AA Administrator shall be given top management support and staff to manage the implementation of this program as it pertains to all applicable laws, orders and regulations, including VEVRAA. Specifically, Morgan Gower or the designated representative's duties include:

- a. Ensures that Blue Ridge CTC lists its job openings in accordance with the requirements of 41 C.F.R. § 300.5.
- b. Ensuring Blue Ridge CTC posts in conspicuous places, available to employees and applicants for employment, notices in a form to be prescribed by the OFCCP Director provided by or through the contracting officer. Such notices shall state the rights of applicants and employees as well as Blue Ridge CTC's obligation under the law to take

- affirmative action to employ and advance in employment qualified employees and applicants who are protected veterans.
- c. Ensuring Blue Ridge CTC's applicants or employees who are disabled veterans are provided the notice in a form that is accessible and understandable to the individual applicant or employee (e.g., providing Braille or large print versions of the notice, or posting a copy of the notice at a lower height for easy viewing by a person using a wheelchair) when an applicant or employee requests the poster in an alternative format, or when Blue Ridge CTC knows that an applicant or employee is unable to read the poster because of a disability. Blue Ridge CTC may also provide the poster to an applicant or employee who is a disabled veteran in other alternate means, such as on disc or in audio recording, as long as the format provided enables the individual who is a disabled veteran to access the contents of a poster.
- d. Ensuring that, with respect to employees, if any, who do not work at a physical location of Blue Ridge CTC, Blue Ridge CTC satisfies its posting obligations by posting such notices in an electronic format, provided that Blue Ridge CTC provides computers, or access to computers, that can access the electronic posting to such employees, or Blue Ridge CTC has actual knowledge that such employees otherwise are able to access the electronically posted notices.
- e. Ensuring electronic notices for employees are posted in a conspicuous location and format on Blue Ridge CTC's intranet or sent by electronic mail to employees. An electronic posting is used by Blue Ridge CTC to notify job applicants of their rights if Blue Ridge CTC utilizes an electronic application process. Such electronic applicant notice are conspicuously stored with, or as part of, the electronic application.
- f. Ensuring that to the extent this requirement is applicable to Blue Ridge CTC, Blue Ridge CTC notifies labor organizations of its EEO policy as required by 41 C.F.R. § 60-300.44(g).
- g. Ensuring Blue Ridge CTC includes the provisions of this clause in every subcontract or purchase order in excess of \$100,000, unless exempted by the rules, regulations, or orders of the Secretary of Labor pursuant to VEVRAA, so that such provisions will be binding upon each subcontractor or vendor, under the terms and conditions of 41 CFR 60-741.5(a).
- h. Ensuring that all solicitations or advertisements for employees placed by or on behalf of Blue Ridge CTC, state that all qualified applicants will receive consideration for employment without regard to their protected veteran status.
- i. Developing, maintaining and, where appropriate, modifying Blue Ridge CTC's AAP for protected veterans, policy statements, personnel policies, internal and external communication techniques including discussions with managers, supervisors and employees to ensure Blue Ridge CTC's policies are followed, and monitoring the effectiveness of these actions.
- j. Advising supervisors that they are responsible to prevent harassment of employees due to their status as a protected veteran.

- k. Identifying problem areas with line management in the implementation of the program, and helping management develop solutions to any identifiable problem area.
- 1. Designing, implementing and overseeing an audit and reporting system to monitor the progress of the University and the AAP's effectiveness, including auditing the contents of Blue Ridge CTC's electronic and hard copy bulletin boards on a regular basis to ensure that compliance information that is posted is up to date.
- m. Serving as liaison between Blue Ridge CTC and governmental enforcement agencies, community groups, vocational rehabilitation organizations, and organizations for protected veterans.
- n. Evaluating the effectiveness of Blue Ridge CTC's plan on a regular basis, and reporting to management.
- o. Monitoring policies and procedures including the selection, evaluation, promotion and training process with regard to the various terms and conditions of employment to attempt to ensure compliance with affirmative action obligations.
- p. Assisting in ensuring that Blue Ridge CTC has processes and procedures: a) to ensure career counseling for employees who are protected veterans, when requested and appropriate; and, b) to review personnel actions, policies, procedures, and employee and applicants' qualifications to ensure protected veterans are treated in accordance with anti-discrimination laws when hiring, promotion, transfer, and termination actions occur.
- q. Keeping management up to date on the latest developments in the areas of EEO and affirmative action.
- r. Assisting in the investigation, handling and disposition of employee discrimination and harassment complaints.
- s. Conducting periodic reviews of offices to ensure compliance in the areas of proper display of posters and notices, and opportunity for participation in University-sponsored recreational, educational and social activities.
- t. Overseeing and ensuring that the below self-identification procedures are conducted as set forth in the VEVRAA regulations, using the language and manner prescribed by the OFCCP Director and published on the OFCCP Web site, as follows:
  - i. Pre-offer self-identification invitation procedures for Blue Ridge CTC's job applicants as set forth in 41 C.F.R. § 60-300.42 (a); and
  - ii. Post-offer identification procedures for Blue Ridge CTC's job applicants as set forth in 41 C.F.R. § 60-300.42 (a).

Further, Blue Ridge CTC does not compel or coerce an individual to self-identify as a protected veteran. Blue Ridge CTC keeps all information on self-identification confidential, and maintains it in a data analysis file (rather than in the medical files of individual employees) as set forth in 41 C.F.R. § 60-741.23(d). Blue Ridge CTC only uses the self-identification information may be used only in accordance with the VEVRAA regulations.

- Ensuring that Blue Ridge CTC complies with its obligations under 41 C.F.R. § 60-300.45, which requires that Blue Ridge CTC establish benchmarks, the purpose of which is to create a quantifiable method by which Blue Ridge CTC can measure its progress toward achieving equal employment opportunity for protected veterans. The benchmarks will be set on an annual basis by using one of two mechanisms described in this AAP, and will be documented also as set forth in this AAP.
- v. If an applicant identifies himself or herself as a disabled veteran in the post-offer self-identification detailed in Paragraph 20 above, Blue Ridge CTC inquires of the applicant whether an accommodation is necessary, and, if so, engages with the applicant regarding reasonable accommodation. Blue Ridge CTC may make such inquiries to the extent they are consistent with the Americans with Disabilities Act. Blue Ridge CTC maintains a separate file in accordance with Section 60-300.23(d) on persons who have self-identified as disabled veterans.

## 2. Management Responsibilities 41 C.F.R. § 60-300.44(i)

Line and upper management are advised of their responsibilities for Blue Ridge CTC's AAP regarding protected veterans within his or her area of responsibility, including but not limited to their obligations to:

- a. Review Blue Ridge CTC's AAP for protected veterans with subordinate managers and supervisors to ensure they are aware of the policy, understand their obligation to comply with it in all personnel actions and understand the need for support at all levels.
- b. Assist in the auditing of plan progress, identification of problem areas, formulation of solutions, establishment of departmental goals and objectives, and development of training programs, when appropriate.
- c. Review the qualifications of applicants and employees in their area of responsibility to ensure protected veterans are treated in a nondiscriminatory manner when hire, promotion, transfer, and termination actions occur; and
- d. Review employees' performance to ensure that illegal discrimination regarding protected veterans does not occur.
- e. Make available career counseling to employees who are protected veterans, when so requested, and as appropriate.
- f. Review position descriptions to see that they adequately reflect the job to be performed.
- g. Audit training programs, hiring, and promotion patterns.
- h. Assist subordinates and upper management in the prevention of harassment.

i. Show support for this AAP.

# Affirmative Action Training 41 C.F.R. § 60-300.44(j)

Blue Ridge CTC provides training to all personnel involved in the recruitment, screening, selection, promotion, disciplinary and other related processes to ensure that its AAP commitments are implemented.

#### ASSESSMENT OF EXTERNAL OUTREACH AND RECRUITMENT EFFORTS

**Assessment:** Blue Ridge CTC evaluated the effectiveness of outreach and recruitment efforts for qualified veterans during its prior AAP year. During that period, of the applicants who chose to complete the self-identification form, 7.37% self-identified as a protected veteran. As a result, Blue Ridge CTC will continue to review and analyze its existing outreach efforts and commit to continue to identify viable partners throughout the year.

### DATA COLLECTION ANALYSIS 41 C.F.R. § 60-300.44(k)

Blue Ridge CTC documents the following computations or comparisons pertaining to applicants and hires on an annual basis and maintains them for a period of three (3) years:

- 1. The number of applicants who self-identified as protected veterans pursuant to § 60-300.42(a), or who are otherwise known as protected veterans;
- 2. The total number of job openings and total number of jobs filled;
- 3. The total number of applicants for all jobs;
- 4. The number of protected veteran applicants hired; and
- 5. The total number of applicants hired.

**See Protected Veterans Three Year Data Collection** 

## **Protected Veterans Three Year Data Collection**

Blue Ridge Community & Technical College

Required Data	May 1, 2017 through April 30, 2018	May 1, 2018 through April 30, 2019	May 1, 2019 through April 30, 2020
Number of applicants who self-identify as protected veterans pre-offer	107	59	48
Total number of job openings	71	59	64
Total number of jobs filled	71	59	64
Total number of applicants for all jobs	1097	571	651
Total number of protected veteran applicants hired	1	4	2
Total number of applicants hired	48	40	49

### BENCHMARKS FOR HIRING 41 C.F.R. § 60-300.45

**Benchmark:** The purpose of establishing benchmarks is to create a quantifiable method by which Blue Ridge CTC can measure its progress toward achieving equal employment opportunity for protected veterans.

The benchmark is not a rigid and inflexible quota which must be met, nor is it considered either a ceiling or a floor for the employment of particular groups. Quotas are expressly forbidden.

Hiring benchmarks are set by Blue Ridge CTC on an annual basis. Blue Ridge CTC documents the hiring benchmark it has established each year. Blue Ridge CTC retains these records for a period of three (3) years.

The current benchmark for protected veterans for this location is set at 5.7%, which matches the national	al
protected veteran benchmark.	

### **Protected Veteran Hiring Ratio**

Total Hires	49
Total Protected Veteran Hires	2
Percentage of Protected	4.1%
Veterans Hires	

This location will continue to implement additional recruitment efforts to attract qualified applicants, including protected veterans, for all job openings.

# Affirmative Action Program for Individuals with Disabilities

## **Blue Ridge Community & Technical College**

# Affirmative Action Program for Individuals with Disabilities

May 1, 2020 through April 30, 2021 Plan Year

#### CONFIDENTIAL, TRADE SECRET, AND PRIVATE MATERIAL

This Affirmative Action Plan contains confidential, trade secret, commercial, and private information of Blue Ridge CTC, which is protected from disclosure by the Office of Federal Contract Compliance Programs pursuant to the Trade Secrets Act, 18 U.S.C. § 1905. The release of this information could cause substantial harm to Blue Ridge CTC or its employees within the meaning of the Freedom of Information Act ("FOIA"), 5 U.S.C. §§ 552 (b)(3), (4), (6) and (7) and the Trade Secrets Act. FOIA protects information in this document from mandatory disclosure to FOIA requestors. See, e.g., *Chrysler v. Brown*, 441 U.S. 281 (1979). Furthermore, release of any trade secret, confidential statistical or commercial information would be arbitrary and capricious in violation of the Administrative Procedure Act. See, e.g., *CNA Financial Corp. v. Donovan*, 830 F.2d 1132, 1144 (D.C. Cir.), cert. denied, 485 U.S. 977 (1988).

## **Blue Ridge Community & Technical College**

#### AFFIRMATIVE ACTION PLAN FOR INDIVIDUALS WITH DISABILITIES

#### May 1, 2020 through April 30, 2021 PLAN YEAR

AAP Approved	hv•		
Tipproved	Dr. Peter Ch	eckovich	
	President		
AAP Prepared	and Approved by	<b>:</b>	
		Morgan Gower	
		FFO Administrator	

### **Blue Ridge Community & Technical College**

# AFFIRMATIVE ACTION PROGRAM FOR INDIVIDUALS WITH DISABILITIES

May 1, 2020 through April 30, 2021 Plan Year

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#### Introduction

Blue Ridge Community & Technical College (Blue Ridge CTC) sets forth this Affirmative Action Program ("AAP") for the year from May 1, 2020 through April 30, 2021, reaffirming its commitment to the spirit and letter of affirmative action law. Through the implementation of this plan Blue Ridge CTC continues its efforts to comply with Section 503 of the Rehabilitation Act of 1973 ("Section 503") and its implementing regulations, as amended, and to make the best possible use of personnel while contributing to the betterment of society and the community.

In developing this plan, Blue Ridge CTC recognizes its duty to ensure equal employment opportunity for, and to prevent discrimination against, individuals with disabilities. The following statement of policy reinforces that belief.

#### **Equal Employment Opportunity Policy Statement 41 C.F.R. § 60-741.44(a)**

In setting forth this plan Blue Ridge CTC reaffirms its belief and commitment in equal employment opportunity for all employees and applicants for employment in all terms and conditions of employment. Morgan Gower, as the EEO Administrator, oversees the plan development, modification, implementation, and reporting requirements and conducts management updates. Blue Ridge CTC's [top U.S. executive, such as its CEO or Chief of its U.S. division of a foreign company] supports Blue Ridge CTC's AAP.

Blue Ridge CTC provides for an audit and reporting system regarding Blue Ridge CTC's affirmative action responsibilities under Section 503 regulations, and assigns overall responsibility for the implementation of affirmative action responsibilities under these regulations.

Blue Ridge CTC recruits, hires, trains and promotes persons in all job titles, and ensures that all personnel actions are administered without regard to disability; and ensures that all employment actions are based only on valid job requirements. Blue Ridge CTC's employees and applicants are not subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in any of the following activities:

- 1. filing a complaint with Blue Ridge CTC or with Federal, state, or local agencies regarding the status covered under this AAP;
- 2. assisting or participating in any investigation, compliance review, hearing, or any other activity related to the administration of any Federal, State, or local requiring equal employment opportunity for individuals with disabilities;
- 3. opposing any act or practice made unlawful by Section 503 or its implementing regulation, or any other Federal, State or local law requiring equal opportunity for individuals with disabilities; or
- 4. exercising any other right protected by section 503 or its implementing regulations in this part.

Blue Ridge CTC's full AAP, absent the data metrics required by 41 CFR § 60-741.44(k), shall be available for inspection upon request at the location and during the hours that are posted at Blue Ridge CTC's establishment [or during regular working hours] at Blue Ridge CTC's Human Resources Office.

#### Review of Personnel Processes 41 C.F.R. § 741.44(b)

- 1. Blue Ridge CTC ensures its personnel processes provide for careful, thorough, and systematic consideration of the job qualifications of applicants and employees with known disabilities for job vacancies filled either by hiring or promotion, and for all training opportunities offered or available.
- 2. Blue Ridge CTC also ensures its personnel processes do not stereotype individuals with disabilities in a manner which limits their access to jobs for which they are qualified.
- 3. Blue Ridge CTC also ensures its applicants and employees with disabilities have equal access to its personnel processes, including those implemented through information and communications technologies.
- 4. Blue Ridge CTC provides necessary reasonable accommodation to ensure applicants and employees with disabilities receive equal opportunity in the operation of personnel processes. Blue Ridge CTC periodically reviews such processes and makes any necessary modifications to ensure that these obligations are carried out. Blue Ridge CTC designs procedures that facilitate a review of the implementation of this requirement by Blue Ridge CTC and the Government. A description of the review and any necessary modifications to personnel processes or development of new processes are included in this AAP, and are as follows:
  - a. The application or personnel form of each known applicant who is an individual with a disability is annotated to identify each vacancy for which the applicant was considered, and the form is quickly retrievable for review by the Department of Labor and Blue Ridge CTC's personnel officials for use in investigations and internal compliance activities.
  - b. The personnel or application record of each known individual with a disability includes: (i) the identification of each promotion for which the individual with a disability was considered, and (ii) the identification of each training program for which the individual with a disability was considered.
  - c. In each case where an employee or applicant who is an individual with a disability is rejected for employment, promotion, or training, Blue Ridge CTC prepares a statement of the reason as well as a description of the accommodations considered. The statement of the reason for rejection (if the reason is medically related), and the description of the accommodations considered, are treated as confidential medical records in accordance with 41 C.F.R. § 60-741.23(d). These materials are available to the applicant or employee concerned upon request.

d. Where applicants or employees are selected for hire, promotion, or training and Blue Ridge CTC undertakes any accommodation which makes it possible for him or her to place an individual with a disability on the job, Blue Ridge CTC makes a record containing a description of the accommodation. The record is treated as a confidential medical record in accordance with § 60-741.23(d).

#### Review of Physical and Mental Job Qualifications 41 C.F.R. § 60-741.44(c)

- 1. Blue Ridge CTC has the following schedule for its review of physical and mental job qualification standards to ensure that, to the extent qualification standards tend to screen out qualified people with disabilities, such qualifications are job-related for the position in question and consistent with business necessity, and adheres to this schedule. The schedule is as follows annually; as new job qualifications are established; and/or, when new equipment is installed.
- 2. Whenever Blue Ridge CTC applies physical or mental qualification standards in the selection of applicants or employees for employment or other changes in employment status such as promotion, demotion or training, to the extent that qualification standards tend to screen out qualified individuals on the basis of disability, the standards are related to the specific job or jobs for which the individual is being considered and consistent with business necessity.
- 3. Blue Ridge CTC may use as a defense to a violation of its obligations in Paragraph 2 above that an individual poses a direct threat to the health or safety of the individual or others in the workplace.
- 4. No pre-employment physical examinations or questionnaires are used by Blue Ridge CTC prior to a job offer contingent on such examinations and other requirements.
- 5. When Blue Ridge CTC conducts a medical examination or inquiry of a person with a disability, it will do so according to the terms and conditions of the Federal Regulations implementing Section 503, and the results of such an examination or inquiry are kept confidential according to Federal regulations, which includes the following exceptions:
  - a. Supervisors and managers may be informed regarding restrictions on the work or duties of the applicant or employee and necessary accommodations;
  - b. First aid and safety personnel may be informed, when appropriate, if the disability might require emergency treatment; and,
  - c. Government officials engaged in enforcing the laws administered by the OFCCP regarding individuals with disabilities, or enforcing The Americans with Disabilities Act ("the ADA") and The Americans with Disabilities Act Amendment Act of 2008 ("the ADAAA"), shall be provided relevant information on request.

# Reasonable Accommodation to Physical and Mental Limitations 41 C.F.R. § 60-741.44(d)

- 1. It is Blue Ridge CTC's policy, as a matter of nondiscrimination, to make reasonable accommodation to the known physical and mental limitations of all otherwise qualified individuals with a disability, unless Blue Ridge CTC can demonstrate that the accommodation would impose an undue hardship on Blue Ridge CTC's business. Undue hardship will be determined by its definition under applicable regulations under Section 503 including, but not limited to the following: Undue hardship means, with respect to the provision of an accommodation, significant difficulty or expense incurred by the contractor, when considered in light of the factors set forth in 41 CFR § 741.2 (aa)(2), such as the overall financial resources of the facility and the impact of the accommodation upon the operation of the facility (this is not an all-inclusive list).
- 2. As a matter of affirmative action, if an employee with a known disability is having significant difficulty performing his or her job and it is reasonable to conclude that the performance problem may be related to the known disability, Blue Ridge CTC shall confidentially notify the employee of the performance problem and inquire whether the problem is related to the employee's disability. If the employee responds affirmatively, Blue Ridge CTC shall confidentially inquire whether the employee is in need of a reasonable accommodation.

#### Anti-Harassment Procedures 41 C.F.R. § 60-741.44(e)

Blue Ridge CTC has developed and implemented procedures to ensure that its employees are not harassed on the basis of disability.

# External Dissemination of Policy, Outreach, and Positive Recruitment 41 C.F.R. § 60-741.44(f)

- 1. Blue Ridge CTC undertakes appropriate outreach and positive recruitment activities that are reasonably designed to effectively recruit qualified individuals with disabilities. It is not contemplated that Blue Ridge CTC will necessarily undertake all the activities listed in Paragraph (f)(2) of this section or that its activities will be limited to those listed. The scope of Blue Ridge CTC's efforts shall depend upon all the circumstances, including the contractor's size and resources and the extent to which existing employment practices are adequate.
- 2. <u>Examples of outreach and recruitment activities</u>. Below are examples of outreach and positive recruitment activities referred to in Paragraph 1 of this section conducted by Blue Ridge CTC, including: [list the activities conducted by Blue Ridge CTC]
  - a. Enlisting the assistance and support of the following persons and organizations in recruiting, and developing on-the-job training opportunities for individuals with disabilities, in order to fulfill its

commitment to provide equal employment opportunity for such individuals:

- i. the State Vocational Rehabilitation Service Agency ("SVRA"), State mental health agency, or State developmental disability agency in the area of the contractor's establishment;
- ii. the Employment One-Stop Career Center (One-Stop) or American Job Center nearest the contractor's establishment;
- iii. the Department of Veterans Affairs Regional Office nearest Blue Ridge CTC's establishment (<u>www.va.gov</u>);
- iv. entities funded by the Department of Labor that provide recruitment or training services for individuals with disabilities, such as the services currently provided through the Employer Assistance and Resource Network (EARN) (www.earnworks.com);
- v. local Employment Network ("EN") organizations (other than Blue Ridge CTC, if Blue Ridge CTC is an EN) listed in the Social Security Administration's Ticket to Work Employment Network Directory (<a href="https://www.yourtickettowork.com/endir">www.yourtickettowork.com/endir</a>);
- vi. local disability groups, organizations, or Centers for Independent Living (CIL) near the contractor's establishment;
- vii. placement or career offices of educational institutions that specialize in the placement of individuals with disabilities; and
- viii. private recruitment sources, such as professional organizations or employment placement services that specialize in the placement of individuals with disabilities.
- b. In addition, Blue Ridge CTC has considered taking the actions listed below to fulfill its commitment to provide equal employment opportunities to individuals with disabilities. It is not contemplated that Blue Ridge CTC will necessarily undertake all of the activities listed below.
  - i. Formal briefing sessions held, preferably on Blue Ridge CTC's premises, with representatives from recruiting sources. Blue Ridge CTC's facility tours, clear and concise explanations of current and future job openings, position descriptions, worker specifications, explanations of Blue Ridge CTC's selection process, and recruiting literature are an integral part of any such briefing. At any such briefing sessions, Blue Ridge CTC's official in charge of Blue Ridge

- CTC's AAP should be in attendance when possible. Formal arrangements are made for referral of applicants, follow up with sources, and feedback on disposition of applicants, from any such briefings.
- ii. Blue Ridge CTC's recruitment efforts at all educational institutions incorporate special efforts to reach students who are individuals with disabilities.
- iii. Blue Ridge CTC makes an effort to participate in work-study programs for students, trainees, or interns with disabilities in programs found through outreach, such as to State and local schools and universities, and through EARN.
- iv. Individuals with disabilities may be made available for participation in Blue Ridge CTC's career days, youth motivation programs, and related activities in Blue Ridge CTC's communities.
- Blue Ridge CTC takes any other positive steps it deems necessary to attract individuals with disabilities not currently in the work force who have requisite skills and can be recruited through affirmative action measures. individuals may be located through State and local agencies supported by the U.S. Department of Education's Rehabilitation Services Administration (RSA) Ticket-to-Work (http://rsa.ed.gov/). local **Employment** Networks, or local chapters of groups or organizations that provide services for individuals with disabilities.
- vi. Blue Ridge CTC, in making hiring decisions, considers applicants who are known to have disabilities for all available positions for which they may be qualified when the position(s) applied for is unavailable.
- 3. Assessment of external outreach and recruitment efforts. Blue Ridge CTC on an annual basis, reviews the outreach and recruitment efforts it has taken over the previous twelve months to evaluate its effectiveness in identifying and recruiting qualified individuals with disabilities. Blue Ridge CTC documents each evaluation, including at a minimum the criteria it used to evaluate the effectiveness of each effort and Blue Ridge CTC's conclusion as to whether each effort was effective. Among these criteria shall be the data Blue Ridge CTC collected pursuant to 41 C.F.R. § 741.44(k) for the current year and the two most recent previous years. If Blue Ridge CTC concludes the totality of its efforts were not effective in identifying and recruiting qualified individuals with disabilities, it identifies and implements alternative efforts listed in Paragraph 3 above in order to fulfill its obligations.

- 4. Blue Ridge CTC sends written notification of its policy relating to its affirmative action efforts to all subcontractors, including subcontracting vendors and suppliers, requesting appropriate action on their part.
- 5. Blue Ridge CTC documents all activities it undertakes to comply with the obligations of this section, and retains these documents for a period of three (3) years.

#### **Internal Dissemination of Policy 41 C.F.R. § 60-741.44(g)**

- 1. Blue Ridge CTC recognizes that even a strong outreach program for individuals with disabilities may be ineffective without adequate internal support from its supervisors and employees. Therefore, to ensure greater employee cooperation and participation in Blue Ridge CTC's efforts regarding its obligation to engage in affirmative action efforts to employ and advance in employment qualified individuals with disabilities, Blue Ridge CTC has developed the following internal procedures. These procedures have been designed to foster understanding, acceptance and support among Blue Ridge CTC's executive, management, supervisory, and other employees to encourage such persons to take the necessary actions to aid the contractor in meeting this obligation.
- 2. Blue Ridge CTC implements and disseminates this policy internally as follows:
  - a. includes the policy in Blue Ridge CTC's policy manual or otherwise makes the policy available to employees; and
  - b. where Blue Ridge CTC is a party to a collective bargaining agreement, it notifies union officials and/or employee representatives of the contractor's policy and request their cooperation;
- 3. Below are some of the other methods Blue Ridge CTC may additionally use to implement and disseminate this policy internally:
  - a. informs all employees and prospective employees of Blue Ridge CTC's commitment to engage in affirmative action to increase employment opportunities for individuals with disabilities;
  - b. periodically schedules special meetings with all employees to discuss the policy and explain individual employee responsibilities;
  - c. publicizes the policy in Blue Ridge CTC's newspaper, magazine, annual report and other media;
  - d. conducts special meetings with executive, management, and supervisory personnel to explain the intent of the policy and individual responsibility for effective implementation making clear Blue Ridge CTC's chief executive officer's support for the affirmative action policy;

- e. discusses the policy thoroughly in both employee orientation and management training meetings;
- f. includes articles on accomplishments of individuals with disabilities in Blue Ridge CTC's publications; and
- g. when employees are featured in employee handbooks and similar publications, includes individuals with disabilities.

#### Audit and Reporting System 41 C.F.R. § 60-741.44(h)

Blue Ridge CTC has designed and has implemented an audit and reporting systems that:

- 1. Measures the effectiveness of Blue Ridge CTC's affirmative action program.
- 2. Indicates any need for remedial action.
- 3. Determines the degree to which Blue Ridge CTC's affirmative action objectives have been attained.
- 4. Determines whether known individuals with disabilities have had the opportunity to participate in all University sponsored-educational, training, recreational and social activities.
- 5. Measures Blue Ridge CTC's compliance with the AAP's specific obligations.
- 6. Documents the actions taken to comply with the obligations of Paragraphs (1) through (5) of this section, and retain these documents as employment records for a period of three years from the date of making of the record.
- 7. Where Blue Ridge CTC, upon its review, finds its AAP to be deficient and need further progress, Blue Ridge CTC undertakes necessary action to bring the program into compliance.

#### Responsibility for Implementation of the Plan 41 C.F.R. § 60-741.44(i)

#### 1. Identification and Responsibilities of the EEO/AA Administrator. 41 C.F.R. § 60-741.44(i)

In furtherance of Blue Ridge CTC's commitment to Affirmative Action and Equal Employment Opportunity, overall responsibility for implementing Blue Ridge CTC's AAP rests with its EEO/AA Administrator, whose identity appears on all internal and external communications regarding Blue Ridge CTC's AAP. The EEO/AA Administrator has been given the necessary senior management support and staff to manage the implementation of this AAP. Specifically, Morgan Gower or the designated representative's duties include the following, all of which are administered in accordance with the Section 503 regulations:

a. Ensuring Blue Ridge CTC posts in conspicuous places, available to employees and applicants for employment, notices in a form to be prescribed by the OFCCP Director provided by or through the contracting officer. Such notices shall state the rights of applicants and employees as well as Blue Ridge CTC's obligation under the law to take

- affirmative action to employ and advance in employment qualified employees and applicants with disabilities.
- b. Ensuring Blue Ridge CTC's applicants or employees with disabilities are provided the notice in a form that is accessible and understandable to the individual applicant or employee (e.g., providing Braille or large print versions of the notice, or posting a copy of the notice at a lower height for easy viewing by a person using a wheelchair) when an applicant or employee requests the poster in an alternative format, or when Blue Ridge CTC knows that an applicant or employee is unable to read the poster because of a disability. Blue Ridge CTC may also provide the poster to an applicant or employee with a disability in other alternate means, such as on disc or in audio recording, as long as the format provided enables the individual with a disability to access the contents of a poster.
- c. Ensuring that, with respect to employees, if any, who do not work at a physical location of Blue Ridge CTC, Blue Ridge CTC satisfies its posting obligations by posting such notices in an electronic format, provided that Blue Ridge CTC provides computers, or access to computers, that can access the electronic posting to such employees, or Blue Ridge CTC has actual knowledge that such employees otherwise are able to access the electronically posted notices.
- d. Ensuring electronic notices for employees are posted in a conspicuous location and format on Blue Ridge CTC's intranet or sent by electronic mail to employees. An electronic posting is used by Blue Ridge CTC to notify job applicants of their rights if Blue Ridge CTC utilizes an electronic application process. Such electronic applicant notice are conspicuously stored with, or as part of, the electronic application.
- e. Ensuring that to the extent this requirement is applicable to Blue Ridge CTC, Blue Ridge CTC notifies labor organizations of its EEO policy as required by 41 C.F.R. § 60-300.44(g).
- f. Ensuring Blue Ridge CTC includes the provisions of this clause in every subcontract or purchase order in excess of \$10,000 under the terms and conditions of 41 CFR 60-741.5(a).
- g. Ensuring that all solicitations or advertisements for employees placed by or on behalf of Blue Ridge CTC, state that all qualified applicants will receive consideration for employment and will not be discriminated against on the basis of disability.
- h. Developing, maintaining and, where appropriate, modifying Blue Ridge CTC's AAP for individuals with disabilities, policy statements, personnel policies, internal and external communication techniques including discussions with managers, supervisors and employees to ensure Blue Ridge CTC's policies are followed, and monitoring the effectiveness of these actions.
- i. Advising supervisors that they are responsible for preventing harassment of employees due to their status as individuals with disabilities.
- j. Ensuring affirmative action training is conducted in accordance with 41 C.F.R. § 60-300.44(g).

- k. Identifying problem areas with line management in the implementation of the program, and helping management develop solutions to any identifiable problem area.
- 1. Designing, implementing and overseeing an audit and reporting system to monitor the progress of Blue Ridge CTC and the AAP's effectiveness, including auditing the contents of Blue Ridge CTC's electronic and hard copy bulletin boards on a regular basis to ensure that compliance information that is posted is up to date and accessible to applicants and employees with disabilities.
- m. Serving as liaison between Blue Ridge CTC and governmental enforcement agencies, community groups, vocational rehabilitation organizations, and organizations for individuals with disabilities.
- n. Evaluating the effectiveness of Blue Ridge CTC's plan on a regular basis, as described in this AAP, and reporting to management.
- o. Monitoring policies and procedures including the selection, evaluation, promotion and training process with regard to the various terms and conditions of employment to attempt to ensure compliance with affirmative action obligations.
- p. Overseeing Blue Ridge CTC's processes and procedures: a) to ensure that career counseling for employees with known disabilities, when requested and appropriate; and, b) to review personnel actions, policies, procedures, and employee and applicants' qualifications to ensure individuals with disabilities are treated in accordance with anti-discrimination laws when hiring, promotion, transfer, and termination actions occur.
- q. Keeping management up to date on the latest developments in the areas of EEO and affirmative action.
- r. Assisting in the investigation, handling and disposition of employee discrimination and harassment complaints.
- s. Conducting periodic reviews of offices to ensure compliance in the areas of proper display of posters and notices, and opportunity for participation in University-sponsored recreational, educational and social activities.
- t. Overseeing and ensuring that the below self-identification procedures are conducted as set forth in the Section 503 regulations, using the language and manner prescribed by the OFCCP Director and published on the OFCCP Web site, as follows:
  - i. Pre-offer self-identification invitation procedures for Blue Ridge CTC's job applicants as set forth in 41 C.F.R. § 60-741.42 (a);
  - ii. Post-offer identification procedures for Blue Ridge CTC's job applicants as set forth in 41 C.F.R. § 60-741.42 (a); and
  - iii. Self-identification invitation procedures for Blue Ridge CTC's employees as set forth in 41 C.F.R. § 60-741.42 (a).

Ensuring that Blue Ridge CTC does not compel or coerce an individual to selfidentify as an individual with a disability, and that Blue Ridge CTC keeps all information on self-identification confidential, and maintains it in a data analysis file (rather than in the medical files of individual employees) as set forth in 41 C.F.R. § 60-741.23(d). Blue Ridge CTC only uses the self-identification information may be used only in accordance with the Section 503 regulations.

- u. Ensuring that Blue Ridge CTC annually evaluates its utilization of individuals with disabilities in each job group, or in its entire workforce in accordance with 41 C.F.R. § 60-741.45, including the following:
  - i. Ensuring that when the percentage of individuals with disabilities in one or more job groups, or in Blue Ridge CTC's entire workforce, as applicable, is less than the utilization goal established in the Section 503 regulations, Blue Ridge CTC takes steps to determine whether and where impediments to equal employment opportunity exist. When making this determination, Blue Ridge CTC assesses its personnel processes, the effectiveness of its outreach and recruitment efforts, the results of its affirmative action program audit, and any other areas that might affect the success of its AAP.
  - ii. Ensuring that Blue Ridge CTC develops and executes action-oriented programs designed to correct any identified problem areas. These action-oriented programs may include the modification of personnel processes to ensure equal employment opportunity for individuals with disabilities, alternative or additional outreach and recruitment efforts from among those listed in 41 CFR § 60-741.44 (f)(1) and (f)(2), and/or other actions designed to correct the identified problem areas and attain the established goal.

#### 2. Management Responsibilities 41 C.F.R. § 60-741.44(i)

Line and upper management are advised of their responsibilities for Blue Ridge CTC's AAP regarding individuals with disabilities within his or her area of responsibility, including but not limited to their obligations to:

- a. Review Blue Ridge CTC's AAP for individuals with disabilities with subordinate managers and supervisors to ensure they are aware of the policy, understand their obligation to comply with it in all personnel actions and understand the need for support at all levels.
- b. Assist in the auditing of plan progress, identification of problem areas, formulation of solutions, establishment of departmental goals and objectives, and development of training programs, when appropriate.
- c. Review the qualifications of applicants and employees in their area of responsibility to ensure qualified individuals with disabilities are treated in a nondiscriminatory manner when hire, promotion, transfer, and termination actions occur.
- d. Review employees' performance to ensure that illegal discrimination regarding individuals with disabilities does not occur.

- e. Make available career counseling to employees with known disabilities, when so requested, and as appropriate.
- f. Review position descriptions to see that they adequately reflect the job to be performed.
- g. Audit training programs, hiring, and promotion patterns.
- h. Assist employees and other members of management in the prevention of harassment.
- i. If an employee with a known disability is having significant difficulty performing his or her job and it is reasonable to conclude that the performance problem may be related to the known disability, confidentially notify the employee of the performance problem and inquire whether the problem is related to the employee's disability. If the employee responds affirmatively, Blue Ridge CTC shall confidentially inquire whether the employee is in need of a reasonable accommodation.
- j. Show support for Blue Ridge CTC's AAP.

#### **Affirmative Action Training 41 C.F.R. § 60-741.44(j)**

Blue Ridge CTC provides training and guidance to all personnel who are involved in the recruitment, screening, selection, promotion, disciplinary and other related processes to ensure that its AAP commitments are implemented.

#### ASSESSMENT OF EXTERNAL OUTREACH AND RECRUITMENT EFFORTS

**Assessment:** Blue Ridge CTC evaluated the effectiveness of outreach and recruitment efforts for qualified individuals with disabilities during its prior AAP year. During that period, of the applicants who chose to complete the self-identification form, 8.29% self-identified as an individual with disability. As a result, Blue Ridge CTC will continue to review and analyze its existing outreach efforts and commit to continue to identify viable partners throughout the year.

#### DATA COLLECTION ANALYSIS 41 C.F.R. § 60-741.44(k)

Blue Ridge CTC documents the following computations or comparisons pertaining to applicants and hires on an annual basis and maintains them for a period of three years:

- 1. The number of applicants who self-identified as individuals with disabilities pursuant to § 60-741.42(a), or who are otherwise known to be individuals with disabilities;
- 2. The total number of job openings and total number of jobs filled;
- 3. The total number of applicants for all jobs;
- 4. The number of applicants with disabilities hired; and
- 5. The total number of applicants hired.

See Individuals with Disabilities Three Year Data Collection

### Individuals with Disabilities Three Year Data Collection

Blue Ridge Community & Technical College

Required Data	May 1, 2017 through April 30, 2018	May 1, 2018 through April 30, 2019	May 1, 2019 through April 30, 2020
Number of applicants who self-identify as individuals with disabilities pre-offer	84	56	54
Total number of job openings	71	59	64
Total number of jobs filled	71	59	64
Total number of applicants for all jobs	1097	571	651
Total number of applicants with disabilities hired	1	3	2
Total number of applicants hired	48	40	49

#### UTILIZATION ANALYSIS 41 C.F.R. § 60-741.45

**41 CFR § 60-741.45 Utilization goals.** The utilization goal is not a rigid and inflexible quota which must be met, nor is it considered either a ceiling or a floor for the employment of particular groups. These goals are not quotas.

**Goal:** OFCCP has currently established a utilization goal of 7 percent for employment of qualified individuals with disabilities for each job group in Blue Ridge CTC's workforce.

**Purpose.** The purpose of the utilization goal is to establish a benchmark against which Blue Ridge CTC measures the representation of individuals with disabilities within each job group in its workforce. The utilization goal serves as an equal employment opportunity objective that should be attainable by complying with all aspects of the affirmative action requirements of the applicable Section 503 regulations.

## Utilization Analysis (Individuals with Disabilities)

Plan Date: 05/01/2020

Blue Ridge Community & Technical College

Job Group	Group Size		VD oyment %	7% Goal Met?	Problem Areas (if any) and Action - Oriented Programs (where utilization goal not met)
Executive/Administrative/Managerial	13	0	0	No	Will review outreach and recruitment effort and adjust accordingly to attract more qualified applicants.
Faculty	30	1	3	No	Will review outreach and recruitment effort and adjust accordingly to attract more qualified applicants.
Instructors/Lecturers	52	1	2	No	Will review outreach and recruitment effort and adjust accordingly to attract more qualified applicants.
Adjunct Faculty	153	0	0	No	Will review outreach and recruitment effort and adjust accordingly to attract more qualified applicants.
Professional Non-Faculty	34	1	3	No	Will review outreach and recruitment effort and adjust accordingly to attract more qualified applicants.
Clerical and Secretarial	16	0	0	No	Will review outreach and recruitment effort and adjust accordingly to attract more qualified applicants.
Technical and Paraprofessional	6	2	33	Yes	
Skilled Crafts	6	0	0	No	Will review outreach and recruitment effort and adjust accordingly to attract more qualified applicants.
Service/Maintenance	21	1	5	No	Will review outreach and recruitment effort and adjust accordingly to attract more qualified applicants.