AFFIRMATIVE ACTION PLAN 1993-1996

OVERALL POLICY STATEMENT

The Community Colleges have carefully developed and outlined the major elements of an effective Affirmative Action/Equal Opportunity/Diversity Plan with the understanding that a successful plan requires more than the knowledge of laws, regulations and current government requirements. It demands leadership, vision, and commitment to fully comprehend what challenges Community Colleges face in preparing our students for the twenty-first century. With this Plan, the Colleges take a step beyond the Community Colleges Affirmative Action Plan of 1989 with the addition of "diversity" both to the title of the Plan and to appropriate sections of the Plan itself. The Colleges, both collectively and individually, commit themselves to not only the valuing of human dignity, but to the appreciation of the necessity of providing all members of the College community an experience that equips them to relate to all persons and groups in the increasingly global and diverse world in which we all live and work.

The Community Colleges wish to take a role of leadership in providing an environment where equity and diversity are truly valued beyond verbal commitments and mere tolerance. This leadership role requires that we all share responsibility for making constructive campus-wide changes in response to the principles set forth in the Affirmative Action/Equal Opportunity/Diversity Plan. By turning our collective energies into making affirmative action, equal opportunity and diversity an integral part of campus life, we continue to fulfill our mission in developing the talents and potential of all members of our College communities and our society.

POLICY STATEMENT ON AFFIRMATIVE ACTION, NON-DISCRIMINATION AND DIVERSITY

The Board of Higher Education of the Commonwealth of Massachusetts is responsible under Chapter 15A of the General Laws of the Commonwealth of Massachusetts for the overall governance of the public higher education system, which includes the fifteen Community Colleges. The Board of Higher Education and the Boards of Trustees of the Community Colleges maintain and promote a policy of non-discrimination on the basis of race, creed, religion, color, gender, sexual orientation, age, disability, veteran status, marital status and national origin. This policy incorporates by reference and where applicable, the requirements of Federal Executive Orders 11246 and 11375 as amended; the Civil Rights Act of 1964 as amended; the Civil Rights Restoration Act of 1988 the Civil Rights Act of 1991; Title IX of the Higher Education Amendments of 1972 as amended; Sections 503 and 504 of the Rehabilitation Act of 1973; the Americans with Disabilities Act of 1990, Section 402 of the Vietnam Era Veterans Readjustment Assistance Act of 1974; and pertinent laws, regulations and executive orders; directives of the Board of Higher Education, the Boards of Trustees of the Community Colleges and the Commonwealth of Massachusetts, and other applicable local, state and federal statutes.

Non-discrimination requires the elimination of all existing unlawful discriminatory conditions, whether purposeful or inadvertent. The Community Colleges are continuing to systematically examine all policies and procedures to be sure that they do not, if implemented as stated, operate to the detriment of any person on the basis of race, creed, religion, color, gender, sexual orientation, age, disability, veteran status, marital status, or national origin. The Colleges shall require that the practices of those responsible in matters of employment and education, including all supervisors and faculty, are non-discriminatory. Should the College discover discrimination in treatment or effect in any employment, educational or service decision, action, inaction or practice within the College, all appropriate corrective and/or disciplinary actions shall be taken under the direction of the President of the College subject to any applicable collective bargaining agreement or other policy or procedure of the College.

The Community Colleges are committed to a policy of affirmative action, equal opportunity, equal education, non-discrimination and diversity. They are committed to providing a learning, working and living environment for their students, employees and other members of the College community,
which values the diverse backgrounds of all people. The Colleges are committed to assuring that the "College Experience" is one that challenges, empowers, supports and prepares its students to live in, work in, and value our increasingly global and diverse world. The Colleges believe that the diversity of socioeconomic, racial, ethnic, religious, gender, sexual orientation, age and disability backgrounds of members of the College Community enriches the institutions and their various constituencies. The Colleges will not tolerate behavior based on bigotry that has the effect of discriminating unlawfully against any member of their communities.

The Community Colleges provide equal access to educational, co-curricular and employment opportunities at the Colleges for all applicants, students and employees regardless of race, color, religion, gender, sexual orientation, national origin, age, disability, or veteran status in compliance with all applicable laws, regulations and policies. All benefits, privileges and opportunities offered by the Colleges are available to all students, employees and other persons having dealings with the institutions on a non-discriminatory basis. The Colleges are committed to taking a pro-active affirmative action posture with respect to their recruitment, selection and promotion of students and employees.

The purpose of this Affirmative Action/Equal Opportunity/Diversity Plan is to establish a set of programmatic objectives that shall provide for the access and advancement of persons of color, women and persons with disabilities with respect to employment and enrollment opportunities. The intent of this Plan is to responsibly recognize, and to whatever extent possible, resolve the effects of past societal discrimination and the impact which that discrimination has had, not only on persons of color, women and persons with disabilities, but on the total academic, educational and social system as well. It is not intended and should not be used to discriminate against any applicant, employee, or student because of race, creed, religion, color, gender, sexual orientation, age, disability, veteran status, marital status or national origin.

In response to that recognition, the Colleges, through their Boards of Trustees and Presidents, fully endorse the plan of action set forth in this Plan and shall oversee and monitor its implementation.

The following specific policies are established:

$ Equal opportunity and affirmative action shall apply to all segments of the College; full- and part-time employment; day and continuing education; the curriculum and offerings of the College.
$ Equal opportunity and affirmative action shall be applied to the recruitment process for employment and/or access to education.
$ Students will have access to the College, programs of study, activities, and other resources intended to serve them, according to the policies of the individual Colleges.
$ Equal employment opportunity and affirmative action will be realized in all personnel employment, including recruitment, application for employment, hiring, benefits, compensation, training, promotion, and termination.
$ All policies, procedures, privileges, and conditions of the College will follow and incorporate applicable equal opportunity and affirmative action rules and regulations.

The above-stated policies are intended to be broad on behalf of the protected group and the goal of promoting diversity in Community Colleges. The Community Colleges pledge to apply all policies consistently, fairly, and vigorously. Attempts to subvert or abuse these policies will not be tolerated. Appropriate action will be taken in the case of infraction.

All policies are made in compliance with applicable laws and executive orders promulgated by the federal and state governments and other appropriate agencies and authorities.

**DEFINITIONS**

**Persons of Color/Minority Persons** (protected class members for purposes of this Plan):
1. **Black**: All persons having origins in any of the Black racial groups of Africa.
2. **Hispanic**: All persons of Mexican, Puerto Rican, Cuban, Central or South American or other Spanish culture or origin, regardless of race.
3. **Cape Verdean**: All persons having origins in the Cape Verde islands.
4. **Asian or Pacific Islander**: All persons having origins in any of the original peoples of the Far East, Southeast Asia, the Indian Subcontinent, or the Pacific Islands. This area includes, for example, China, India, Japan, Korea, the Philippine Islands and Samoa.
5. **American Indian or Alaskan Native**: All persons having origins in any of the original peoples of North America, and who maintain cultural identification through tribal affiliation or community recognition.

**Persons with Disabilities**: Any person who has a physical or mental impairment that substantially limits one or more major life activities, has a record of such an impairment, or is regarded as having such an impairment.

**Sexual Orientation**: Actual or perceived homosexuality, heterosexuality, or bisexuality, either by orientation or by practice, which shall not include sexual orientation where minor children are the sex object, as prohibited by Massachusetts General Laws, Chapter 151B. For purposes of this Plan, "sexual orientation" is synonymous with the Massachusetts statutory term "sexual preference."

**SPECIFIC POLICIES**

**Policy Concerning Sexual Harassment**

Sexual harassment of a student, an employee or any other person in the College is unacceptable, impermissible and intolerable.

Sexual harassment is a form of sex discrimination. It occurs in a variety of situations that share a common element: the inappropriate introduction of sexual activities or comments into the work or teaming situation. Often, sexual harassment involves relationships of unequal power and contains elements of coercion as when compliance with requests for sexual favors becomes a criterion for granting work, study or grading benefits. However, sexual harassment may also involve relationships among equals, as when repeated sexual advances or demeaning verbal behaviors have a harmful effect on a person's ability to study or work in the academic setting.

For general purposes, sexual harassment may be described as unwelcome advances, requests for sexual favors, and other physical conduct and expressive behavior of a sexual nature when (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or education; (2) submission to or rejection of such conduct by an individual is used as the basis for academic or employment decisions affecting that individual; or (3) such conduct has the purpose or effect of substantially interfering with an individual's academic or professional performance and creating an intimidating, hostile, or demeaning employment or educational environment.

Such behavior is expressly forbidden by federal and state regulations and recent action by the federal government has established that such behaviors are actionable under provisions of Title VII of the 1964 Civil Rights Act and the provisions of Title IX of the 1972 Educational Amendments.

In keeping with these regulations, a concerted effort will be made to protect employees, students, and others from sexual harassment as defined. The final authority and ultimate responsibility for the prevention of sexual harassment will rest with the President of each Community College. The President or his/her designee will take reasonable measures to prevent sexual harassment and will act positively to investigate alleged harassment and to effect a remedy when an allegation is determined to be valid. However, the Affirmative Action Officer will have the responsibility for the overall development, administration and monitoring of all programs, policies, procedures and
regulations related to sexual harassment. Complaints about sexual harassment should be registered with the Affirmative Action Officer.

The Colleges' policies and procedures on sexual harassment shall be well publicized to students and employees, for example, in student and employee handbooks. In addition to formal procedures, Colleges shall ensure that appropriate opportunities are available to students and employees to obtain counseling concerning their rights under the law and effective means of informally resolving grievances.

Policy in Support of Pluralism

The Community Colleges have historically been a major contributing element to the emergence of our nation as one of the most technologically and economically advanced societies of the world. The important role that the Community Colleges can play is profoundly dependent upon the extent to which they may draw from the full collective of intellectual resources within each College's community of scholars, students, and administrators. Any condition or force that impedes the fullest utilization of the human and intellectual resources available represents a force of destructive consequence for the development of our Commonwealth and, ultimately, our nation.

Community College students, faculty, staff and visitors must be free from conduct that has the purpose or effect of interfering with an individual's academic or professional performance and creating an intimidating, hostile or demeaning educational or employment environment. Therefore, the Community Colleges establish a policy of unequivocal condemnation of all forms of ethnic, religious, cultural, or racial intolerance within the fifteen College communities.

This policy condemns all conditions and all actions or omissions, including all acts of verbal harassment or abuse, which deny or have the effect of denying to an individual his/her rights to equality, dignity and security in violation of his/her rights guaranteed under the law. The policy reaffirms the doctrine of civility, appreciation for pluralism and the pre-eminence of individual human dignity as preconditions to the achievement of an academic community that recognizes and utilizes the resources of all persons while recognizing and reaffirming the tenets of academic freedom. The Community Colleges recognize their obligation to protect the rights of free inquiry and expression, and nothing herein shall be construed or applied so as to abridge the exercise of rights under the Constitution of the United States and other federal and state laws.

The Community Colleges will vigorously strive to achieve diversity sufficiently reflective of our society. However, diversity alone will not suffice. There must be a unity and cohesion in the diversity that we seek to achieve, thereby creating an environment of pluralism.

The Community Colleges bear a responsibility by edict and an obligation by social morality to promote understanding and acceptance of ethnic, cultural, religious and racial diversity as we strive to create an atmosphere of dignity for all individuals and groups within our system of public higher education. The President or his/her designee will take reasonable measures to prevent and discourage harassment and will act positively to investigate alleged harassment and to effect a remedy or resolution when an allegation is determined to be valid.

Policy on Non-Discrimination and Accommodation for Persons with Disabilities

The Community Colleges recognize the multitude of barriers that confront persons with disabilities in access to both employment and education. Consistent with state and federal statutes that affirm and protect the equal opportunity rights of persons with disabilities, the Community Colleges adopt a policy of non-discrimination and equal opportunity for otherwise qualified persons with disabilities. In all matters of employment, disabled persons will receive full and fair consideration.
The Community Colleges will take constructive measures to ensure equal opportunity in all areas of employment including recruitment, selection, upgrading, opportunities for training and development, rate of compensation, benefits and all other terms and conditions of employment. The establishment of goals and timetables is not required.

Necessary reasonable accommodations will be afforded to any disabled employee to enable such otherwise qualified disabled employee to perform the essential functions of the job. Reasonable accommodations will also be afforded to disabled applicants for employment to enable them to adequately pursue a candidacy for any available position. Any reasonable accommodations provided by the Colleges will be provided to the extent that such accommodations do not impose any undue hardship on the Colleges in the conduct of their operations.

Specific efforts to be undertaken by the Colleges to ensure equal opportunity for disabled persons may be outlined in individual College Affirmative Action Plans. It is recognized that all facilities may not be available and accessible at a particular time.

**Employment of Persons with Disabilities**

1. The Colleges will examine all existing employment policies, practices and facilities to assure that they do not disparately treat or impact otherwise qualified persons with disabilities. Where such disparity is found, it will be corrected as quickly and completely as is reasonable under existing financial constraints.
2. The Colleges will make every effort to employ and advance in employment otherwise qualified persons with disabilities. This requires constructive, pro-active measures to advocate for equal opportunity in all areas of employment, including recruitment, selection, upgrading, training, compensation, benefits and all other terms and conditions of employment. Such measures shall include, but not be limited to, vigorous identification of qualified persons with disabilities for selection, promotion and training.
3. In accordance with law, the Colleges will afford reasonable accommodations to any otherwise qualified employee with a disability to enable the employee to perform the essential functions of the job. Reasonable accommodations will also be afforded to applicants for employment who have a disability to enable them to adequately pursue a candidacy for any available position.

**Education of Persons with Disabilities**

1. The Colleges will examine all existing admissions, student support and other student life policies, practices and facilities to assure that they do not disparately treat or impact otherwise qualified disabled persons. Where such disparity is found, it will be corrected as quickly and completely as is reasonable under existing financial constraints.
2. The Colleges will adopt a policy of non-discrimination with respect to admissions, access to programs and facilities and services and freedom from unlawful acts of humiliation and harassment for all otherwise qualified disabled persons.
3. In accordance with law, the Colleges will provide necessary reasonable accommodations to otherwise qualified students with disabilities to assure equal access to programs, facilities and services.

In addition, the Colleges will conduct ongoing monitoring activities to ensure that all divisions or departments within the College are in compliance with the policy of providing reasonable accommodation to disabled students and employees.

Any employee or student who believes he/she has been a victim of discrimination due to a disability may initiate the informal claim or formal complaint procedures as outlined in the Affirmative Action Grievance Procedure contained herein. Further information may be obtained by contacting the Affirmative Action Officer or the Office for Disabled Services.
Policy Against Gender and Sexual Orientation Discrimination

The Colleges are committed to providing a working, living and learning environment that utilizes the resources of all members of the College community and develops the talents of all of its students without regard to gender or sexual orientation. Any condition that interferes with the development of talents by causing discrimination based on gender or sexual orientation constitutes a destructive force within the College community.

The Colleges hereby prohibit all forms of discrimination on the basis of gender or sexual orientation. This prohibition bars all acts that have the effect of denying to any person equality of right, entitlement, benefit or opportunity by reason of such person's gender or sexual orientation. Harassment by personal vilification is prohibited whenever such harassment is based on a person's gender or sexual orientation.

Examples of discrimination on the basis of a person's gender or sexual orientation, all of which are prohibited by this policy include but are not limited to:

1. Differences in salaries (or other benefits) that are paid to one or more men and one or more women if the differences are not based on a bona fide occupational qualification.
2. Excluding members of one gender or sexual orientation from a category of positions or from a department or a division.
3. Classifying a position or positions as being suitable only for persons of one gender or of one particular sexual orientation.
4. Restricting the number of persons of one gender or sexual orientation in a category of positions or in a department or division.
5. Waiving required position qualifications for one gender or sexual orientation but not for another.
6. Developing position descriptions or qualifications that, without lawful justification, are so specific as to have a disparate exclusionary impact on one gender.
7. Using information on marital or parental status for employment decisions where the use of such information has an adverse impact on persons of one gender or sexual orientation.
8. Singling out or ignoring one group of students because of their gender or sexual orientation.
9. Treating or causing others to treat persons of one gender or sexual orientation differently from persons of the other gender or another sexual orientation differently because of assumptions about or stereotypes of the intellectual ability, interests or aptitudes of persons of a particular gender or sexual orientation.
10. Diverting a discussion of a student's work toward a discussion of his/her physical attributes or appearance (this will typically constitute sexual harassment, which is one kind of discrimination on the basis of gender).
11. Harassing or abusing or encouraging others to harass or abuse a person or group of persons because of their gender or sexual orientation, whenever such harassment or abuse constitutes harassment by personal vilification.

Any employee or student who believes he/she has been a victim of gender or sexual orientation discrimination may initiate the informal claim or formal complaint procedures as outlined in the Affirmative Action Grievance Procedure contained herein. Further information may be obtained by contacting the Affirmative Action Officer.

Policy Concerning Consensual Relationships

Under this policy of the Community Colleges, consenting romantic and sexual relationships between faculty and student, librarian and student, administrator and student, classified staff member and student, or supervisor and employee are deemed unprofessional. Because such relationships interfere with or impair required professional responsibilities and relationships, they are looked upon with disfavor and are strongly discouraged.
Policy on AIDS

What is AIDS?
AIDS stands for acquired immunodeficiency syndrome. It is a disease caused by the human immunodeficiency virus (HIV) that can damage the immune system and destroy the body’s ability to fight off illness. AIDS by itself does not kill, but allows other infections (such as pneumonia, cancer and other illnesses) to invade the body, and these diseases can kill.

State Policy Regarding Discrimination
Under both the Massachusetts Constitution, Article 114, and Massachusetts General Laws, Chapter 151B, it is unlawful to discriminate against a person on the basis of his/her handicap. These laws, as well as other state laws offer various forms of protection to people with AIDS and those perceived to be at risk of having AIDS.

Federal Policy Regarding Discrimination
A variety of federal laws prohibit AIDS-related discrimination. The Rehabilitation Act of 1973 prohibits discrimination against people with AIDS, or those perceived to be at risk of having AIDS, by federal agencies, federal contractors and subcontractors, and by institutions receiving federal funds.

Title VII of the Civil Rights Act of 1964 may protect against discriminatory practices associated with AIDS where such practices have a disproportionate impact on persons of a particular gender, race or national origin.

The Americans with Disabilities Act prohibits discrimination against people with AIDS, or those perceived to be at risk of having AIDS.

Prohibition Against Discrimination
Persons suffering from AIDS are persons with disabilities for purposes of laws that prohibit discrimination against otherwise qualified persons with disabilities. Such discrimination is therefore prohibited by this Plan in accordance with the Policy on Non-Discrimination and Accommodation for Persons with Disabilities.

Increasing public awareness and concern over AIDS and commitment to fair, equitable, compassionate and dignified treatment of all members of the various College communities have prompted the Colleges to agree to the necessity of institutional policies with respect to persons infected with HIV or AIDS.

It is essential that each College deal with the potential medical, ethical and legal issues related to an occurrence of the disease within the College Community. Because there presently is no specified cure for AIDS, the most important goal for the Colleges is to increase awareness and provide education to prevent further spread of the disease. The most effective means of addressing these issues at present is to assure that persons with AIDS are not discriminated against, to educate students and employees about AIDS and to develop reasonable policies, precautions and procedures.

Policy Development
To this end, each College will develop a policy that includes the following elements:

1. Establishment of an AIDS Policy and Programming Committee or Task Force.
   Function: It shall be the function of this group to advise the President and other appropriate administrators on AIDS policy development and educational programming.
Composition: This group shall be composed of representatives of various campus constituencies, such as students, unions, academic and student life administrators, health professionals, personnel directors, and affirmative action officers.

2. Provision for periodic review and adjustment of policy.

3. Guidelines for dealing with problems presented by students, employees and other members of the College community who have or could transmit AIDS or AIDS related conditions.

4. Specific educational programs.

The following is the AIDS POLICY for Cape Cod Community College:

Discrimination of any sort against a person with HIV is unacceptable and intolerable.

While HIV infection is potentially lethal, it is also absolutely preventable in the workplace and classroom. Current knowledge indicates that students or employees with any form of HIV infection do not pose a health risk to other students or employees in an academic setting.

The primary response of the college is education about AIDS. It is the intent of the college to include students in the design, implementation, and evaluation of comprehensive educational programs.

Health care workers with clinical responsibilities and certain lab technicians will take universal precaution in handling all contact situations with students or patients. An institutional committee will be set up to handle educational and programmatic discussions. A committee will consist of at least: 1) Student Life Administrator, 2) Academic Life Administrator, 3) Director of Health Services, 4) an Allied Health faculty member, 5) Affirmative Action Officer, 6) a student member, 7) Director of Human Resources, 8) Union representative.

A person with AIDS will be considered as having handicapping conditions: the college will guarantee the legal rights of this individual. No reference to the existence of any form of HIV infection will exist in the admissions or hiring process or employee evaluations. The exclusion of people with HIV infection for reason of that infection constitutes unwarranted discrimination.

No mandatory HIV testing of either employees or students will be undertaken. Mandatory testing programs are cost-ineffective, counter-productive, and discriminatory. However, the college Health Services is familiar with sources of testing for antibodies to HIV and able to refer students or employees requesting tests.

CONFIDENTIALITY of information shall be treated with extraordinary care. In general, no information concerning complaints or diagnosis will be provided to faculty, administrators, or even parents, without the written consent of the patient. This position with respect to health records is supported by the Family Education Rights and Privacy Act of 1974.

Support services for students and employees with HIV are easily accessible through existing Student Services or employee assistance programs. Formal and informal grievance procedures also exist through appropriate employee collective bargaining agreements. The institution condemns any harassment of students or employees either known or suspected of being infected with HIV. Any such actions will be dealt with quickly and effectively. Students who believe they are the subject of discriminatory educational practices are asked to seek advice through the Dean of Student Services or another appropriate college official. Employee complaints should be registered with the Affirmative Action Officer.

BHE Submission
Since each College is required to do a self-study in response to the Americans with Disabilities Act, that self-study is the document that will be submitted to the Board of Higher Education Committee within one hundred and twenty (120) days following the effective date of this plan.

Policy Concerning Contracting and Purchasing
When selecting contractors, suppliers, and vendors of goods and services, including goods and services secured in connection with construction projects, the Colleges will offer equal opportunity to all qualified persons and entities and will not discriminate on the basis of race, creed, religion, color, gender, sexual orientation, age, disability, veteran status, marital status or national origin.

The Colleges shall seek to locate and shall encourage the use of minority and female contractors, subcontractors, vendors and suppliers. The Colleges will identify business primarily operated by members of such protected classes with the help of agencies such as the State Office of Minority and Women Business Assistance in order to encourage bids and proposals from potential contractors, vendors, and suppliers. The State Office of Minority and Women Business Assistance (SOMWBA) [[617] 727-8692] identifies businesses certified as bona fide minority or women owned enterprises. The Colleges shall refer to the SOMWBA listings of such businesses in order to solicit bids from contractors, vendors, and suppliers.

The Community Colleges will promote affirmative action and equal opportunity in transacting business with contractors, vendors and suppliers by including in their contracts a statement requiring contractors, vendors, and suppliers to commit themselves to equal opportunity and affirmative action, such as the following:

Non-Discrimination in Employment and Affirmative Action: The Contractor shall not discriminate against any qualified employee or applicant for employment because of race, color, national origin, ancestry, age, sex, sexual orientation, religion, veteran status, or disability. The Contractor shall in the performance of this contract take affirmative action to employ minority and female subcontractors, vendors and suppliers. The Contractor agrees to comply with all applicable federal and state statutes, rules and regulations prohibiting discrimination in employment, including Title VII of the Civil Rights Act of 1964, the Age Discrimination in Employment Act of 1967, Section 504 of the Rehabilitation Act of 1973, the Americans With Disabilities Act of 1990, Massachusetts General Laws, Chapter 151B and all applicable administrative orders and executive orders.

The Colleges reserve the right to disqualify as a contractor any person or entity that fails to adhere to the prohibitions against discrimination in employment that are contained in this section.

Additionally, the Community Colleges will provide periodic monitoring reports to the Board of Higher Education as requested by the Chancellor. Such reports would indicate the level of purchases from minority business enterprises and indicate progress and/or difficulties in implementing the College’s minority vendor program.

RESPONSIBILITY FOR IMPLEMENTATION OF AFFIRMATIVE ACTION

The final authority and ultimate responsibility for the implementation of affirmative action will rest with the President of each Community College. However, the Affirmative Action Officer will have the responsibility for the overall development, administration and monitoring of all affirmative action programs, policies, procedures and regulations. The Affirmative Action Officer will report directly to the President and will bear responsibility for the preparation and execution of all affirmative action policies and programs. A further explanation will be found in the Director's/Officer's responsibilities and duties.

The Board of Higher Education and the BHE staff will necessarily be an integral part of the development of affirmative action/equal opportunity as related to and conveyed through personnel policy in collective bargaining agreements. The BHE will be mindful of Community
College policies to ensure that collective bargaining agreements are developed in a manner consistent with matters of affirmative action and equal opportunity previously established.

Each supervisor will be accountable for ensuring that affirmative action and equal opportunity are integrally tied to all aspects of any recruitment, hiring, training or advancement-related decisions to which they are party. They will be aware of goals and will consult with the Affirmative Action Officer prior to and in the course of such actions. In the event that a supervisor and the Affirmative Action Officer identify problem areas, which are impeding the College's efforts to meet its goals, they will develop an action plan designed to move the College toward successful attainment of its objectives.

The President or his/her designee shall be responsible for reviewing recruitment and admissions.
AFFIRMATIVE ACTION OFFICER

Duties and Responsibilities

Statement of Responsibilities:
The Affirmative Action Officer shall have the task of infusing affirmative action into all aspects of the College. The Director/Officer shall be responsible for the development, administration and evaluation of affirmative action policies, procedures, programs and goals. The Director/Officer shall serve as monitor of local, state and federal laws and regulations relating to affirmative action and equal opportunity and compliance thereof. The Director/Officer shall administer to all segments of the College - students and employees.

Reporting Line of the Position:
The Director/Officer shall report directly to the President of the College.

Examples of duties: (not exhaustive)

1. Submit a written report to the President at least once a year.
2. Recommend steps to develop and implement the College Affirmative Action Plan.
3. Recommend related policy and procedures.
4. Coordinate the development of goals and timetables.
5. Review and/or initiate recruitment, hiring and maintenance procedures, including approval of all job descriptions, vacancy notices and advertisements prior to posting and dissemination; may serve on search committees, ex officio; and exercise necessary authority in the processes of personnel actions, including signing personnel action forms certifying that the action is consistent with all College policies and procedures regarding affirmative action and equal opportunity as required by law.
6. Develop employment recruitment strategies for the protected groups.
7. Assist and monitor the development of student recruitment for the protected groups.
8. Respond to system, state and federal audits and/or reports as appropriate.
10. Provide technical assistance and consultation to all segments of the College regarding affirmative action and equal opportunity.
11. Advise groups and individuals at the College of the laws, regulations and rights of affirmative action and equal opportunity.
12. Serve as receiver and administrator of alleged affirmative action and equal opportunity complaints and grievances.
13. Advise others on issues and practices of affirmative action.
15. Provide a network for persons in the protected group.
16. Serve as College liaison with the Board of Higher Education and Directors/Officers in other Colleges to ensure appropriate uniformity throughout the Commonwealth.
17. Implement special projects, e.g., minority recruiting programs, special training and awareness programs.
DISSEMINATION OF PLAN

The Affirmative Action Plan will be widely distributed both internally and externally and discussed in the College community. A copy of the Affirmative Action Plan will be distributed to every major work area at each College and a copy will be maintained in the Library and the Affirmative Action Office. Copies of the Plan will be made available upon request to any student, employee, applicant for student status or for employment or member of the community. Supervisors and department heads will be informed of the College's continued commitment to affirmative action and equal opportunity and of their responsibility for making supervisory and managerial judgments consistent with the Plan.

The College will apprise minority organizations, women's organizations and community groups concerned with employment of its equal opportunity and affirmative action policies. Copies will be mailed to any agency, institution or individual upon request.

In accordance with state and federal regulations, a notice will be included in all vacancy postings and other appropriate college publications, contracts, solicitations for bids, purchase orders, leases. The following is the statement for Cape Cod Community College:

Cape Cod Community College is an Affirmative Action/Equal Opportunity Employer. We encourage applications from candidates who will enrich and contribute to the cultural and ethnic diversity of our College and no not discriminate on the basis of age, race, creed, color, religion, marital status, gender, sexual orientation, veteran status, national origin, or disability status in its education programs or in admission to, access to, treatment in, or employment in its programs or activities as required by the Title VI Civil Rights Act of 1964; Title IX, Education Amendments of 1972; Section 504 of the Rehabilitation Act of 1973; and regulations promulgated thereunder; 34 C.F.R. Part 100 (Title VI), Part 106 (Title IX), and Part 104 (Section 504); and the Americans with Disabilities Act of 1990. All questions, concerns, complaints or requests for auxiliary aids and services regarding the Americans with Disabilities Act should be forwarded to Chet Yacek, Director of Human Resources and A.D.A. Compliance Coordinator; or Joyce Chasson, Director of the O'Neill Center for Disability Services; or Roseanna Pena-Warfield, Affirmative Action Officer and Coordinator of Title IX; telephone (508) 362-2131 or TDD (508) 362-9639.

This notice is available in large print, audiotape, and in Braille from the A.D.A. Compliance Coordinator.

Selection for and participation in College employment is without regard to race, creed, religion, color, gender, sexual orientation, age, disability, marital status, veteran status or national origin.

AFFIRMATIVE ACTION PLAN OF ACTION

Program Purpose and Intent
The Community Colleges are committed to a policy of affirmative action. The purpose of this program is to establish programmatic objectives, which will provide for the access and advancement of minorities, women, and persons with disabilities with respect to both employment and education. The content of this program is to acknowledge and responsibly alleviate the effects of societal discrimination and its impact on the protected group.
Scope
Affirmative action and equal opportunity shall be viewed as an integral part of the mission and purpose of each Community College. The Affirmative Action Policy by its very nature shall affect and apply to all aspects of recruitment, employment and education.

The opportunity for education for students in the protected group will be an imperative. Affirmative action programs should support not only student admissions to the College but also its programs.

In employment, affirmative action will affect recruitment, terms and conditions of employment, administrative procedures and relevant policies and practices of the College.

Workforce and Utilization Analysis
A procedure for implementation, of the plan will be undertaken and it will include opportunities for maximum communication between the responsible parties, i.e., supervisors, the Affirmative Action Officer and the President. A workforce and utilization analysis shall be conducted annually.

In an effort to acknowledge and responsibly alleviate the effects of social discrimination on protected groups, Cape Cod Community College will work toward developing and implementing a plan on Workforce and Utilization analysis. It will also be the intention of the Affirmative Action Officer to conduct an annual workforce and utilization analysis.

Cape Cod Community College's Affirmative Action Workforce Profile as of Spring 1994 is shown as Appendix B. Annual reviews will be conducted to see if the goals, as set in the College's Strategic Plan 1993-1998, are being met.

Under-Utilization
Under-utilization exists where the number of females and minorities in an occupational category is fewer than would reasonably be expected based upon the availability of qualified persons for employment. Where the means of determination of under-utilization is based upon a percentage of the actual workforce, a disparity will be said to exist when the percentage is equal to one or more members of the work area being studied. When under-utilization is identified for appropriate organizational units and occupational categories, goals and timetables are established as a means of increasing the employment of females and minorities at the earliest possible time. When collective bargaining agreements allow, positions may be targeted to address under-utilization.

Goals
Affirmative action goals fall into two categories:

Hiring goals are targets for increasing the employment of women and minorities in appropriate organizational units and/or occupational categories of the College workforce. They are an essential element of the College affirmative action plan. Hiring goals are not rigid quotas. They are reasonable estimates of what is attainable and are established separately for women and minorities.
Program goals include special efforts to remove barriers, to improve awareness or sensitivity, to address problem areas identified within the College affirmative action plan, to bring about conditions that will promote the hiring goals, or to address changes taking place within the institution.

Operating Statement
Data on College work force composition of the availability for employment of the protected group in the relevant populations shall be provided by the Affirmative Action Officer to the appropriate administrative officers. The Affirmative Action Officer shall then analyze data relevant to their divisions or work areas to determine if under-utilization of the protected group exists. The development of goals and timetables to correct any identified under-utilization shall be the responsibility of the Affirmative Action officer with input from the appropriate administrative officers. Although the basic responsibility for implementation of the affirmative action/equal opportunity program necessarily rests with the administrative officers of the College, the Affirmative Action Officer is responsible for providing advice and assistance.

Hiring Goals and Timetables
Affirmative action employment goals are established as a result of the workforce and utilization analysis. The purpose of the goals is to develop targets for recruitment based on the utilization analysis. The intent is to inform the employee(s) who will be involved in the process of recruiting and hiring.

Affirmative action goals are realistic and attainable given the availability of prospective employees and probability of vacant positions.

Timetables are the determined period of time in which goals may be accomplished. The time period shall normally be between two (2) and five (5) years but should not normally exceed the life of the Plan.

Identification of Problem Areas and Remedial Approaches
On an annual basis at the request of the Chancellor, the President shall submit a report to the Chancellor as referenced in Auditing and Reporting and shall include an analysis of problem areas and possible solutions and may cover such issues as curricular concerns, employment and student recruitment, hiring, retention of employees, resignations, and College activity and program availability. It will also consider and give an analysis of the established goals and timetables.

Programmatic Efforts
The Community Colleges have, as a group, committed themselves to a policy of affirmative action/equal opportunity and non-discrimination throughout this Plan, The Colleges realize, however, that the development and implementation of specific programmatic efforts, both individually and collaboratively, will be essential to the establishment of an action oriented program. Rather than rendering affirmative action plans that merely represent a compilation of policies, procedures and prohibited practices solely designed to avoid discrimination, these action-oriented elements ensure that this Plan becomes a proactive, aggressive tool as opposed to a passive document.

The Identification of Problem Areas and Remedial Approaches for Cape Cod Community College are reported in Appendix C.
A. Collaborative Efforts

In an effort to fully establish joint collaborative programs that will enhance the implementation of the Community Colleges' Affirmative Action/Equal Opportunity Plan, the Affirmative Action Officers of the fifteen institutions shall meet regularly to assist each other and to work toward the development of the following joint programmatic initiatives:

1. Comprehensive Categorized Recruitment Contact Source

A comprehensive directory of recruitment resources will be developed for each major category of positions (i.e., academic discipline, administrative area, field of focus) listing the various known resources for contact. This directory will list individuals, departments, institutions, organizations, professional associations and their various caucuses that are known to be good sources for minority, female or disabled applicants. In addition, the directory will also contain a listing of major publications such as newspapers, journals or other periodicals that print job advertisements and have substantial circulation among women, minorities, disabled persons and other appropriate persons or groups. Trade or professional journals for each academic discipline and professional area will also be included.

2. Program of Professional Enrichment for Affirmative Action Officers

In conjunction with the BHE Office, the Affirmative Action Officers will develop a program of professional enrichment for affirmative action personnel, which will include workshops, seminars and other kinds of enrichment opportunities that will assist them in the performance of their duties. Insofar as possible, reliance will be placed on the expertise of persons within the public higher education system, local, state and federal agencies, and professional organizations and associations in order to keep costs to a minimum.

3. Seminar for Trustees, Presidents, Vice Presidents, and Deans

It is a known fact that the implementation of effective programs of affirmative action and equal opportunity are only as effective as the commitment and full understanding at the Trustee and executive level of the institution. In order to strengthen this commitment and understanding at the Community Colleges, the Affirmative Action Officers, upon direction from the Council of Presidents, will develop seminars to strengthen the understanding and sensitivity of the Trustees and line managers to the importance of their respective roles in fostering and affecting affirmative action and equal opportunity.

The Colleges may develop other collaborative efforts.

B. Individual Campus Efforts

Specific programmatic efforts determined by the individual Colleges may take any of several forms: projects, programs, defined strategies, structured activities or other tactical steps that contribute to fulfillment of the Colleges' affirmative action and equal opportunity goals and objectives. Each College will develop individual specific programs to assist in identifying and overcoming deficiencies, increasing representation of minorities, women and disabled persons within the workforce and the student body and providing increased opportunities for under-represented groups, both in the area of employment and in the area of the student learning environment. Cross-cultural programming, sensitization of all members of the College communities to the rights and needs of all persons, including minorities, women and persons with disabilities will play a major part. The involvement of all segments of the College community in both the
planning and the implementation of such programming will be an essential factor in its success.

Each College shall submit to the Board of Higher Education’s Affirmative Action Officer an analysis of programmatic efforts within ninety (90) days of the start of academic year 1993-94 or after BHE's approval of this Plan, whichever is later.

HIRING PROCEDURES

Proper hiring procedures are crucial to the success of affirmative action. The procedures will begin with recruitment plans, which should be prepared for review by the Affirmative Action Officer for each hire before commencing with advertisement. These plans will support the affirmative action goals and will include the use of the mailing lists of contacts and the resume file developed and maintained by the Executive Director of Affirmative Action at the Board of Higher Education. Goals will be reviewed at the time of recruitment.

Elapsed time between the initial public announcement of an available position and the deadline for submission of all applications must allow for adequate selective recruitment of racial and ethnic minorities, women and disabled persons. The effectiveness of personal contacts and other sources is dependent upon the mail and telephone calls. This approach, therefore, requires more time than traditional newspaper advertisements. Thus:

A. For all vacancies for positions that are half-time or greater, the Affirmative Action Officer will meet with the hiring manager to determine an appropriate recruitment time frame, which will allow sufficient time to recruit under-utilized persons while simultaneously meeting the organization's need to fill the position as soon as possible. The Affirmative Action Officer will negotiate with the staff member(s) conducting the hiring to determine an appropriate recruitment time frame which will allow sufficient time to recruit under-utilized persons while simultaneously meeting the organization's need to fill the position as soon as possible.

B. Deans will be encouraged to plan ahead and schedule all searches so as to allow sufficient time to conduct effective affirmative action searches.

If the recruitment process fails to yield sufficient numbers of qualified candidates from the designated protected group, serious consideration will be given to re-advertisement and to other avenues that may help to ensure success.

The Affirmative Action Officer shall have access to all applications for the purpose of reviewing and certifying the process and the outcome and for the purpose of collecting data to conduct applicant flow studies, etc. Additionally, the Director/Officer may make recommendations for interviewing affirmative action candidates.

The interview process will include a face-to-face meeting between the candidate and the supervisor and may include other appropriate persons who have responsibility in the work area. An interview form will be completed by the supervisor on all women and minorities who were interviewed as well as the recommended candidate. The Affirmative Action Officer will review each recommendation for appointment and sign it to verify compliance with affirmative action procedures. If the Affirmative Action Officer finds that the recruitment and selection process does not satisfy affirmative action
requirements, he/she should submit his/her reservations in writing to the President along with the appointment papers.

In regard to promotions, the College will seek to provide the opportunity for in-house advancement as long as affirmative action is taken into consideration.

All hiring procedures will be submitted to the Chancellor of the Board of Higher Education within 45 (forty-five) days after the effective date of the Plan or after approval of the Plan by the Board of Higher Education, whichever date is later. New procedures or modifications to procedures will be submitted within forty-five days after adoption.

The Hiring Procedures for Cape Cod Community College are contained in Appendix D.

GRIEVANCE PROCEDURE

When employees or students feel their equal opportunity rights have been breached, the grievance process is a mechanism for resolution. If a complaint involves a grade dispute, a student may only process the complaint in accordance with the Student Grievance Procedure, even if the student alleges that a grade was improper because of discrimination.

Grievance and Hearing Procedure

I. Informal Step
To initiate the informal step, the grievant shall discuss the concern or breach with the Affirmative Action Officer. If a student is involved, the Affirmative Action Officer will consult with the Vice President of Academic and Student Affairs in attempting to resolve the complaint. The purpose of the informal grievance process is to allow for any misunderstanding to be aired and resolved and to provide an opportunity for the grievant and the person alleged to have violated the grievant's rights to attempt to resolve the concern prior to the formal grievance process.

The grievant will be encouraged to use the informal process as a means of clarifying the problem, seeking counsel for self and deciding on a course of action.

The College will publicize the informal grievance process in an effort to encourage persons to talk through their concern with College officials who will be empathetic and sensitive to affirmative action/equal opportunity issues.

II. Step 1
When a grievant believes that he/she has been discriminated against because of his/her race, color, religion, national origin, age, sexual orientation, sex or disability status, and the matter is not resolved at the informal step, the grievant may within thirty (30) calendar days from the date the grievant knew or should have known of the alleged discriminatory action, initiate the formal grievance procedure by filing a grievance in writing with the Affirmative Action Officer. A student who believes that he/she is the victim of sexual harassment or any other form of discrimination may initiate his/her complaint not later than thirty (30) calendar days following the end of the instructional period when the alleged incident occurred. The grievance shall contain a statement of...
all known facts pertaining to the alleged violation and shall be filed on the Affirmative Action/Equal Employment Opportunity grievance form (see Appendix A), which shall be available from the Affirmative Action Officer.

Within fourteen (14) calendar days from the date the formal grievance is filed, the Affirmative Action Officer shall attempt to resolve the complaint through discussion with the grievant, the supervisor, and other involved persons. If a student is involved, the Affirmative Action Officer shall also consult with the Dean of Student Services. The Affirmative Action Officer may attempt to mediate the complaint to the mutual agreement of the parties and the Affirmative Action Officer. If such agreement is reached, it shall be reduced to writing and the Affirmative Action Officer shall notify the parties and the President of the closure of the complaint. If the Affirmative Action Officer is unable to resolve the complaint, he/she shall notify the parties and the President.

III. Step 2
A. Appeal to Equal Employment Opportunity Board

If the complaint is not resolved at Step 1, the grievant may request a hearing before the Equal Employment Opportunity Hearing Board by filing a written request with the Affirmative Action Officer within seven (7) calendar days after receiving notice from the Affirmative Action Officer that the complaint has not been resolved or within seven (7) calendar days after the fourteen (14) day time period for resolution at Step 1 has expired, whichever is sooner. The Affirmative Action Officer shall notify the hearing board and shall set a hearing date which is not less than five (5) calendar days or more than twenty (20) calendar days after notification of grievant's request for hearing. The grievant, the person against whom the grievance is filed, and the supervisor(s) involved (where applicable) shall submit position statements and any supporting documentation to the Affirmative Action Officer at least three full working days prior to the hearing.


1. Jurisdiction of the Hearing Board: The Hearing Board shall have jurisdiction only for complaints arising under the Affirmative Action/Equal Employment Opportunity Policy.

2. Membership: The President shall designate two (2) members of the College's Affirmative Action/Equal Employment Opportunity Committee, one individual from the same identifiable group as the grievant, one individual from the same identifiable group as the person against whom the complaint is filed, and one administrator to constitute the hearing board. The Affirmative Action Officer shall be a non-voting member. If the grievance involves a student, the Vice President of Academic and Student Affairs shall also be a non-voting member. A voting member shall be designated by the President to serve as presiding officer.

3. Disqualification: No member of the Affirmative Action/Equal Employment Opportunity Committee shall be appointed to the hearing board who is a party to the issue or who is to testify on behalf of any party to the issue.

4. Establishment of Hearing Date: The Affirmative Action officer shall set a hearing date which is not less than five (5) calendar days or more than twenty (20) calendar days after notification of the grievant's request for hearing.

5. Evidence: The position statements and supporting documentation submitted by the grievant, the person against whom the grievance is filed, and the supervisor(s) and all information developed by the Affirmative Action Officer in
his/her, investigation of the facts of the case shall be made available to the hearing board at least two (2) full working days in advance of the hearing. Hearsay evidence shall be admissible, but the hearing board shall determine the weight of such evidence.

6. **Rights of Parties:** Any grievant who is a party to a hearing shall have the following rights:
   a. right to be heard;
   b. right to present evidence;
   c. right to present witnesses;
   d. right to representation of his/her own choosing;
   e. right to cross-examine witnesses; and
   f. right to have official time off to attend hearing without loss of pay.

7. **Type of Hearing:** The hearing shall normally be a closed meeting at the discretion of the President of the College or his/her designee.

8. **Records of the Proceedings:**
   a. The Hearing Board shall arrange for a record to be made of the hearing.
   b. Any priority to the issue may request copies of the record of the proceedings provided that he/she pay for the cost of such copy. The cost of such copy shall be waived for the grievant.

9. **Hearing Board Determination:**
   a. The Hearing Board shall rule only on the basis of facts or evidence presented at the hearing.
   b. All members present must vote, except for the Affirmative Action Officer and the Vice President of Academic and Student Affairs, if the grievance involves a student, and the decision shall be made by simple majority.
   c. The recommendation of the Hearing Board shall be made in writing to the President within seven (7) calendar days following final adjournment of the hearing. The hearing board may conclude that a claim lacks merit and recommend dismissal of the claim. The Hearing Board may conclude that there is merit to the claim in which case its recommendation shall state the findings that support its conclusion and shall specify the action or actions it recommends to remedy the violation of the policy against discrimination. It should be understood that the purpose of the recommended action should be to remove the effects of the discrimination, including redress to the grievant when appropriate, and to prevent its continuation or repetition.
   d. The President shall evaluate the recommendation and make a final decision within fourteen (14) calendar days of the receipt thereof. A copy of the President's decision shall be provided to the grievant, supervisor(s), the Affirmative Action Officer, the Vice President of Academic and Student Affairs, if a student is involved, and members of the hearing board. The grievant and the supervisor(s) shall be provided with a copy of the Hearing Board's recommendation.
   e. The decision of the President will be the final level of appeal within the public system of higher education.

**IV. Choice of Forum**

Filing a grievance in accordance with the procedures herein detailed in no way abrogates the grievant's right to file complaints with the appropriate state and federal agencies or with the court. However, once the grievant initiates proceedings in any
other forum, his/her rights to proceed under the affirmative action grievance procedure are waived.

V. Sanctions

If the recommendations made at any level of the grievance procedure result in sanctions against employees, these sanctions shall be regarded as administrative actions subject to all conditions of applicable collective bargaining agreements and the College and/or Board of Higher Education’s personnel policies. If the recommendations made at any level of the grievance procedure result in sanctions against a student, the student has the right to appeal such sanctions through the Student Grievance Procedure.

AFFIRMATIVE ACTION COMMITTEE

An Affirmative Action Committee shall be established consisting of at least seven (7) members representative of faculty, administrators, non-teaching professionals, classified staff and students. The Committee shall include protected group representation. The members shall be selected or appointed in accordance with College policy. The Affirmative Action Officer shall be an ex-officio member of the Committee.

The Committee shall act as a policy advisory body to the President in all matters concerning affirmative action and equal opportunity. Specific responsibilities of the Committee shall be:

1. To advise and assist the President and the Affirmative Action Officer in developing, implementing and evaluating the College’s Affirmative Action Program;
2. To recommend changes in the program or policy;
3. To represent the concerns and problems of all employment areas of the College as these problems relate to equal opportunity;
4. To be informed about the rules and procedures of the College as well as federal and state laws and regulations governing affirmative action and equal opportunity;
5. To meet as necessary, but not fewer than two (2) times a year;
6. To serve on the employee grievance hearing board as requested by the President; and
7. To help sensitize and educate the College community regarding the affirmative action issues facing higher education and the larger society and to help broaden understanding of diversity in our society as well as to encourage behaviors appropriate to a pluralistic society.

AUDITING AND REPORTING

Primary responsibility for monitoring compliance and auditing the implementation of the Affirmative Action/Equal Opportunity/Diversity Plan rests with the Affirmative Action Officer and the Title IX/Section 504 Coordinator. These officers shall furnish the President with progress reports and shall inform the President of practices or policies that may not be in compliance with the policy of affirmative action, non-discrimination and equal opportunity.
The Affirmative Action Officer will annually review the progress being made toward achievement of the College's affirmative action goals. The review shall include the goals and timetables in order to recommend revisions that may be required as a result of changes in federal or state law, availability figures, institutional performance or other circumstances that affect the implementation of this policy. In addition, he/she will assure that annual compliance reports required by the Board of Higher Education and other state and federal agencies are completed. The Title IX/Section 504 Coordinator will review annually the progress made toward complying with current legislation, the Affirmative Action/Equal Opportunity/Diversity Plan, and the actions taken to ensure equal opportunity and affirmative action to all disabled students and employees.

To ensure compliance with this Plan, the Affirmative Action Officer and the Title IX/Section 504 Coordinator will also review and evaluate the applicable policies, programs and activities related to job requirements, performance criteria, personnel benefit plans, students support services, facilities and programmatic access, vendor contract submission and services, media advertising and public relations materials, including all College publications. Recruitment and hiring procedures will be monitored using the methods described in this Plan. All monitoring and analyses will be conducted as necessary to identify problem areas and provide recommendations to remedy them.

On an annual basis, at the request of the Chancellor, each College will submit a report to the Board of Higher Education Council's Office. The content and format of the report will be prescribed by the BHE Office. The annual report will present an accounting of activities and progress achieved with regard to affirmative action and will include but not be limited to a review of achievement of all goals and timetables, current problems and efforts to address them, plans for the coming year, assessment of all efforts undertaken in pursuit of full equal opportunity and a summary of current comparative workforce statistics.

The Affirmative Action Officer shall conduct periodic audits of the utilization analysis and goals. The purpose of the audit will be to assess progress toward established goals and to apprise other persons responsible for recruitment of the findings. Continuous monitoring is important to the success of the plan.

The findings, while utilized throughout the year, will be reported formally in the annual report. Problem areas and successes will be reported.

Additionally, compliance reports requested by other agencies should be included as an internal audit mechanism.

(The Board of Higher Education became the Board of Higher Education effective July 1996. This Plan was updated in accordance with reorganization and change of titles September 1, 2000)