

**BREMERTON  
SCHOOL DISTRICT**



**AFFIRMATIVE ACTION PLAN  
2019-2024**

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## **I. INTRODUCTION**

It is the policy of the Bremerton School District to provide equal employment opportunity for all applicants and staff in all aspects of employment, including recruitment, hiring, retention, assignment, transfer, promotion, and training. Such equal employment opportunity shall be provided without unlawful discrimination based on race, color, creed, sex, age, national origin, marital status, sexual orientation, including gender identity, veteran status or the presence of any sensory, mental or physical disability.

The District's nondiscrimination and affirmative action policy is set forth in Appendix A. The following Affirmative Action Plan will outline steps to be taken to ensure that District policies and practices do not unlawfully discriminate against an individual on the basis of race, color, creed, sex, age, national origin, marital status, sexual orientation, including gender identity, veteran status or the presence of any sensory, mental or physical disability. Furthermore, reasonable steps will be taken to actively promote employment opportunities to qualified individuals in protected groups that are underutilized in the workforce.

The Superintendent of the District is assigned responsibility for implementing our Affirmative Action Plan. However, it is emphasized that every employee is expected to comply with and facilitate the ultimate success of the program.

The Equal Employment Opportunity program will be evaluated each year. The Affirmative Action Officer will report to the Board, as part of its standard reporting procedures, progress in the implementation of the District's Affirmative Action Plan.

Copies of the Affirmative Action Plan will be made available to the State Human Rights Commission, the Office of Superintendent of Public Instruction, the State Department of Personnel, staff members, community groups, and other interested parties.

## **II. PURPOSE**

It is the purpose of this Affirmative Action Plan of the District to promote, monitor and maintain the District's affirmative action and equal employment opportunity policies. These policies provide for equal employment opportunities for all employees and applicants for employment without unlawful discrimination on the basis of race, color, creed, sex, age, national origin, marital status, sexual orientation, including gender identity, veteran status or the presence of any sensory, mental or physical disability, and promote diversity in the District's workforce.

It is also the purpose of this Plan to identify at all levels of the workforce, areas of underutilization of protected groups and to identify and address, when possible, the factors that may be causing such underutilization. This Plan is designed to promote

outreach, recruitment, training and education efforts intended to expand the pool of qualified applicants to promote diversity, consistent with the District's standards of excellence.

This Plan advances equal employment opportunity without preferential treatment on the basis of race, gender, ethnicity or national origin. This Plan is also designed to ensure that District policies are properly implemented without unlawful discrimination on the basis of race, color, creed, sex, age, national origin, marital status, sexual orientation, including gender identity, veteran status or the presence of any sensory, mental or physical disability.

### **III. RESPONSIBILITY FOR IMPLEMENTATION AND MAINTENANCE OF THE PLAN**

- A. The Superintendent has the overall responsibility for the development, implementation, coordination, and monitoring of the Affirmative Action Plan and is responsible for ensuring that administrators and supervisors are fully aware of their role in supporting the Plan. The Superintendent has delegated to the Affirmative Action Officer the authority to represent the Superintendent in these matters. The Affirmative Action Officer is the Assistant Superintendent Finance, Operations, & Human Resources.
- B. The Affirmative Action Officer is charged with the responsibility of making known the District's desire and commitment to employ members of protected as well as nonprotected groups through regular and frequent contact with community groups and employment agencies and through identifying, to the extent possible, persons with requisite skills and talents for projected openings throughout the District. The Affirmative Action Officer shall ensure that recruitment efforts are reaching protected groups as well as unprotected groups in all categories where underutilization exists.
- C. The Affirmative Action Officer will advise the Superintendent and/or Board on equal opportunity matters as required. The Officer will monitor and evaluate the Plan's accomplishments and will prepare memoranda addressing proposed action and other issues as required by this Plan.
- D. The Affirmative Action Officer can be reached at (360) 473-1026 or by writing to Affirmative Action Officer, Personnel Office, Bremerton School District, 134 Marion Avenue North, Bremerton, WA 98312.

### **IV. DISSEMINATION OF PLAN AND POLICIES**

It is the responsibility of the Superintendent of the District or the Superintendent's designee to inform all applicants for employment, all current employees, all persons responsible for hiring within the District, all employee associations, and all District

contractors and subcontractors of the District's commitment to equal employment opportunity.

Communication of the District's Affirmative Action Plan will be accomplished as follows:

A. Internal and External

1. Copies of the 2019-2024 Affirmative Action Plan will be distributed to all organizations, agencies and individuals inside and outside the District as follows:
  - Board of Directors
  - All administrators
  - All schools and/or building locations
  - The president of all employee associations
  - Any employee, upon request
  - The Office of State Superintendent of Public Instruction
  - The Washington State Human Rights Commission
  - The State Department of Personnel
2. A statement of the District's equal employment opportunity policy will be placed in District recruitment material and application forms.
3. All District recruiting sources will be informed annually regarding the District's nondiscrimination policy and its Affirmative Action Plan.
4. Upon adoption of the District's 2019-2024 Affirmative Action Plan, the Communications and Community Relations Office will issue a statement and information about the Plan in District publications.
5. Announcements of training opportunities that promote the goals of the Plan will be issued to staff through the District's web site.
6. All District contractors, vendors and suppliers will be notified that they must comply with the District's equal employment opportunity policy and this Plan.
7. The name, address, and telephone number of the District's Affirmative Action Officer will be published, at least annually, in regular District publications to staff and the community. The Affirmative Action Officer and his/her contact information is also identified in Appendix B of this document.

B. Internal

1. All District job postings will include an equal employment opportunity statement.

2. Upon employment, each new employee will be informed of our Affirmative Action Plan and policies against discrimination.
3. Unit and department administrators shall at least annually inform all staff of the District's Affirmative Action Plan.

## V. NUMERICAL ANALYSIS OF WORKFORCE

This section of the Affirmative Action Plan reflects a numerical analysis of the Bremerton School District workforce demographics.

The tables that follow contain a numerical study of the District's workforce. The term "underutilization" as used in this policy means having fewer members of an affected group in a particular job category than reasonably would be expected based upon their availability. The statistical comparisons in this section involve the use of workforce statistics for geographic areas relevant to Bremerton derived from public census reports. Most of these reports are available on the Office of Superintendent of Public Instruction's website:

<http://www.k12.wa.us/equity/equity-and-civil-rights/required-policies-and-procedures>

The use of such geographic areas and statistics is intended only for the purpose of implementing this Plan and facilitating identification of areas of potential underutilization. These statistical comparisons do not have any independent legal or factual significance. The statistics and geographic areas have been selected and used in good faith with respect to this Plan.

### A. Availability Study

To research and prepare information for the District's 2019-2024 Plan, an availability analysis was conducted based on state census reports and statistical population studies from various sources for the minority, female, disabled, veteran and aged workforce. The Washington State Office of Financial Management utilized data from Census 2010 to create summary reports for Kitsap County.<sup>1</sup>

- The data in the reports indicate that the percentage of minorities<sup>2</sup> in the Kitsap County civilian workforce<sup>3</sup> is 16.35% and the percentage of women is 53.40%. This compares to the overall population in Kitsap County having minorities comprising 12.01% and women comprising 48.90%.

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<sup>1</sup> Available at <http://www.census.gov/2010census/>

<sup>2</sup> Census 2010 allowed people to classify themselves into one of seven mutually exclusive racial categories: White alone, Black/African American alone, American Indian/Native American alone, Asian alone, Hawaiian/Other Pacific Islander alone, Some Other Race alone, or Two or More Races. It also allowed individuals to mark themselves as Hispanic/Latino in origin. For the purposes of this Plan, "minority" does not include those in either the "Some Other Race alone" or "Two or More Races" groups as these categories are not tracked by the District for affirmative action purposes.

<sup>3</sup> For the purposes of this Plan, "workforce" includes non-military persons age 16 and over in the workforce according to Census 2010 data

- In the available labor force, 0.98% were identified as unemployed minorities and 4.70% were identified as unemployed women. The underlined figures are utilized as the theoretical availability figure, or “TA,” in the utilization studies below.
- The data identified disabled individuals in the Kitsap County civilian workforce as 9.29% and employed disabled individuals comprised 3.66% of this population.<sup>4</sup>
- Persons age forty and over comprise 31.92% of the overall population in Kitsap County.<sup>5</sup>

B. Theoretical Availability and Statistically Expected Utilization Figures

After the theoretical availability (“TA”) was determined for protected groups in Kitsap County, a straight comparison was conducted against the TA figure. The District determined the number of employees in each protected group by collecting voluntary data during the hiring process. In addition, the TA figure was reduced by 20% to arrive at an “SEU,” or statistically expected utilization, and a comparison was performed against the SEU as well. The SEU comparison is done because it is a commonly accepted practice to use a figure that is 80% of the theoretical availability in determining whether protected groups are meaningfully underutilized, because pure chance may account for utilization that is 20% less than the theoretical availability. Both figures, however, are considered in the identification of problem areas and possible underutilization. As used in this Plan, “deviation” from TA or SEU refers to the value obtained by subtracting the actual utilization percentage from the TA or SEU percentage.

A specific analysis was completed for each of the following job categories: certificated administrators, teachers, certificated support personnel, classified administrators, assistants, and other classified employees.

C. Salary Ranges as of October 1, 2018.

**Salary Ranges**

Teachers and Support Services	\$51,778 to \$103,897
Certificated Administrators	\$96,585 to \$145,053
Classified Administrators	\$77,220 to \$116,101
Classified Assistants	\$17.64 to \$22.87 per hour
Other Classified	\$14.09 to \$38.94 per hour

<sup>4</sup><https://data.census.gov/> Table ID: S2301 Employment Status 2018 ACS 5-Year Estimates Subject Tables

<sup>5</sup> This number was calculated by summing the total number of persons ages 40-64 and then dividing by the total population of Kitsap County.

VI. UTILIZATION STUDIES – CHARTS D1 through D7

CHART D1

**Bremerton School District  
Utilization Analysis  
Minorities – 2018**  
**(Yellow fill indicates underutilization)**

Job Group	Total Employees	African American	Asian American	Native American	Hispanic American	Pac Isl./Haw	Multi-Racial	Total Minority	Minority Percent	Theoretical Availability	Statistically Expected Utilization	Deviation from TA	Deviation from SEU
Certificated Administrators	22	0	0	0	0	0	0	0	0.00%	16.35%	13.08%	16.35%	13.08%
Classified Administrators	12	0	0	0	0	0	0	0	0.00%	16.35%	13.08%	16.35%	13.08%
Certificated Support Staff	62	2	2	0	1	0	1	6	9.68%	16.35%	13.08%	6.67%	3.40%
Teachers	308	4	3	4	14	3	2	30	9.74%	16.35%	13.08%	6.61%	3.34%
Classified Assistants	127	4	6	3	11	0	1	25	19.69%	16.35%	13.08%	-3.34%	-6.61%
Other Classified	208	9	8	3	5	8	1	34	16.35%	16.35%	13.08%	0.00%	-3.27%
<b>Total</b>	740	23	23	10	30	10	5	101	13.65%	16.35%	13.08%	2.70%	0.22%



CHART D2

**Bremerton School District  
Utilization Analysis  
Females - 2018**

Job Group	Total Employees	Total Females	Percentage of Females	Theoretical Availability	Statistically Expected Utilization	Deviation from TA	Deviation from SEU
Certificated Administrators	22	14	63.64%	53.40%	42.72%	-10.24	-20.92
Classified Administrators	12	8	66.67%	53.40%	42.72%	-13.27%	-23.95%
Certificated Support Staff	62	54	87.10%	53.40%	42.72%	-33.70%	-44.38%
Teachers	308	233	75.65%	53.40%	42.72%	-11.60%	-22.28%
Classified Assistants	127	114	89.96%	53.40%	42.72%	-22.60%	-33.28%
Other Classified	208	149	71.63%	53.40%	42.72%	-18.23%	-28.91%
<b>TOTAL</b>	<b>739</b>	<b>572</b>	<b>77.40%</b>	<b>53.40%</b>	<b>42.72%</b>	<b>-24.00%</b>	<b>-34.68%</b>

CHART D3

**Bremerton School District  
Utilization Analysis  
Disabled – 2018**  
**(Yellow fill indicates underutilization)**

Job Group	Total Employees	Total Disabled	Percentage of Disabled	Theoretical Availability	Statistically Expected Utilization	Deviation from TA	Deviation from SEU
Certificated Administrators	22	1	4.55%	9.29%	7.43%	4.74%	2.88%
Classified Administrators	12	0	0.00%	9.29%	7.43%	9.29%	7.43%
Certificated Support Staff	62	2	3.23%	9.29%	7.43%	6.06%	4.20%
Teachers	308	9	2.92%	9.29%	7.43%	6.37%	4.51%
Classified Assistants	127	7	5.51%	9.29%	7.43%	3.78%	1.92%
Other Classified	208	3	1.44%	9.29%	7.43%	7.85%	5.99%
<b>TOTAL</b>	<b>739</b>	<b>22</b>	<b>2.98%</b>	<b>9.29%</b>	<b>7.43%</b>	<b>6.31%</b>	<b>4.45%</b>

**CHART D4**

**Bremerton School District  
Utilization Analysis  
Persons Age Forty and Over – 2018**

<b>Job Group</b>	<b>Total Employees</b>	<b>Total Age Forty and Over</b>	<b>Percentage Age Forty and Over</b>	<b>Theoretical Availability</b>	<b>Statistically Expected Utilization</b>	<b>Deviation from TA</b>	<b>Deviation from SEU</b>
<b>Certificated Administrators</b>	22	19	86.36%	31.92%	25.54%	-54.44%	-60.82%
<b>Classified Administrators</b>	12	11	91.67%	31.92%	25.54%	-59.75%	-66.13%
<b>Certificated Support Staff</b>	62	44	70.97%	31.92%	25.54%	-39.05%	-45.43%
<b>Teachers</b>	308	200	64.94%	31.92%	25.54%	-33.02%	-39.40%
<b>Classified Assistants</b>	127	96	75.59%	31.92%	25.54%	-43.67%	-50.05%
<b>Other Classified</b>	208	153	73.56%	31.92%	25.54%	-41.64%	-48.02%
<b>TOTAL</b>	739	523	70.77%	31.92%	25.54%	-38.85%	-45.23%

**VII. UTILIZATION ANALYSIS BY JOB CATEGORY - IDENTIFICATION OF PROBLEM AREAS**

- A. **Certificated Administrators.** This job category includes the Assistant Superintendent, Superintendent, Director of Special Programs, Director of Career, Technical and STEM Education, Director of West Sound Technical Skills Center; Assistant Director of Special Services, assistant principals, and principals.

	<b>2018</b>	<b>2018 % of Group</b>	<b>2014</b>	<b>2014 % of Group</b>
<b>Minorities</b>	0	0.00%	0	0.00%
<b>Females</b>	14	63.64%	9	45.00%
<b>Disabled</b>	1	4.55%	1	5.00%
<b>Over 40</b>	19	86.36%	20	95.00%

Represented Categories: This analysis indicates that representation of women and persons aged 40 and over in this job group are over both the theoretical availability (TA) and the statistically expected utilization (SEU) figures.

Underutilized Categories: This analysis indicates that the percentage of minorities has remained underrepresented in this job group. Disabled persons are also underrepresented.

- B. **Teachers.** This job category includes all teachers from preschool to grade 12, including special education teachers.

	<b>2018</b>	<b>2018 % of Group</b>	<b>2014</b>	<b>2014 % of Group</b>
<b>Minorities</b>	30	9.74%	29	8.66%
<b>Females</b>	233	75.65%	262	61.79%
<b>Disabled</b>	9	1.22%	19	5.67%
<b>Over 40</b>	200	64.94%	207	91.67%

Represented Categories: This analysis indicates that representation of women and persons aged 40 and over in this job group are over both the theoretical availability (TA) and the statistically expected utilization (SEU) figures.

Underutilized Categories: This analysis indicates that the percentage of minorities has remained underrepresented in this job group. Disabled persons are also underrepresented.

- C. **Certificated Support Personnel.** This job category includes multi-media information specialists, learning and curriculum specialists, psychologists, occupational and physical therapists, speech language pathologists, etc. Each person in this job category is certificated.

	<b>2018</b>	<b>2018 % of Group</b>	<b>2014</b>	<b>2014 % of Group</b>
<b>Minorities</b>	6	9.68%	2	9.52%
<b>Females</b>	54	87.10%	19	90.48%
<b>Disabled</b>	2	3.23%	2	9.52%
<b>Over 40</b>	44	70.97%	17	80.95%

Represented Categories: This analysis indicates that representation of women and persons aged 40 and over in this job group are over both the theoretical availability (TA) and the statistically expected utilization (SEU) figures.

Underutilized Categories: This analysis indicates that the percentage of minorities has remained underrepresented in this job group. Disabled persons are also underrepresented.

- D. **Classified Administrators.** This job category includes the Directors of Facilities and Capital Projects, Communication and Community Engagement, Transportation and Student Safety; Supervisors of Business Operations, Child Nutrition Services, Human Resources, Technology Services, Safety and Support, Enterprise Database; Coordinators of Student Services (West Sound Tech) and Digital Education; and the Technical Director of the Performing Arts Center.

	<b>2018</b>	<b>2018 % of Group</b>	<b>2014</b>	<b>2014 % of Group</b>
<b>Minorities</b>	0	0.00%	0	0.00%
<b>Females</b>	8	66.67%	8	66.67%
<b>Disabled</b>	0	0.00%	0	0.00%
<b>Over 40</b>	11	91.67%	11	91.67%

Represented Categories: This analysis indicates that representation of women and persons aged 40 and over in this job group are over both the theoretical availability (TA) and the statistically expected utilization (SEU) figures.

Underutilized Categories: This analysis indicates that the percentage of minorities has remained underrepresented in this job group. Disabled persons are also underrepresented.

- E. **Classified Assistants.** This job category includes paraeducators, special education and other assistants who provide instruction in state- or federally- funded programs, and playground supervisors.

	<b>2018</b>	<b>2018 % of Group</b>	<b>2014</b>	<b>2014 % of Group</b>
<b>Minorities</b>	24	18.90%	15	10.79%
<b>Females</b>	114	89.76%	128	92.09%
<b>Disabled</b>	7	5.51%	9	6.47%
<b>Over 40</b>	96	75.59%	116	83.45%

Represented Categories: This analysis indicates that representation of minorities, women, and persons aged 40 and over in this job group are over both the theoretical availability (TA) and the statistically expected utilization (SEU) figures.

Underutilized Categories: This analysis indicates that the percentage of disabled persons has remained underrepresented in this job group.

- F. **Other Classified Employees.** This job category includes maintenance, custodial, child nutrition service workers, bus drivers, secretarial and clerical employees, campus security, accounting specialists, computer technicians, etc.

	<b>2018</b>	<b>2018 % of Group</b>	<b>2014</b>	<b>2014 % of Group</b>
<b>Minorities</b>	35	16.83%	26	13.33%
<b>Females</b>	149	71.63%	137	70.26%
<b>Disabled</b>	3	1.44%	7	3.59%
<b>Over 40</b>	153	73.56%	158	81.03%

Represented Categories: This analysis indicates that representation of minorities, women, and persons aged 40 and over in this job group are over both the theoretical availability (TA) and the statistically expected utilization (SEU) figures.

Underutilized Categories: This analysis indicates that the percentage of disabled persons has remained underrepresented in this job group.

- G. This review shows that there has been an increase since 2014 in the percentage of minorities all groups except for the Certificated and Classified Administrator job groups. The District's total minority workforce is underrepresented, when compared the theoretical availability (TA) by 2.70% but is considered represented when compared to the statistically expected utilization (SEU) by - 0.57%.
- H. This review revealed that the District does not underutilize women or persons 40 and over in any job category.
- I. This study shows that disabled individuals are underutilized in many job classifications. The District remains committed to its policy against discrimination on the basis of disability.
- J. Data on the number of members in protected classes is based on self-identification at the time of application, or through periodic workplace surveys and may not be entirely accurate.

## VIII. GOALS AND ACTION STEPS

### GOAL 1

#### JOB ANALYSIS, RECRUITMENT AND SELECTION

The District's goal is to seek purposely and actively a diverse pool of qualified applicants from all protected groups, as well as nonprotected groups, for certificated and classified positions at all levels to ensure an increased opportunity for members of underrepresented groups to be considered for employment by the District.

#### Strategies

- 1.1 Analyze job descriptions to ensure that qualification requirements and screening criteria are based on specific job functions and do not have the effect of screening out protected group applicants who have the ability to perform District jobs.
- 1.2 Ensure that recruitment efforts include and actually reach protected groups, as well as nonprotected groups. Focus recruitment on efforts that ensure underrepresented groups are reached. Expand recruitment efforts by continuing to attend job fairs and community events in person as well as posting positions on recruiting websites and social media.
- 1.3 Remove barriers to an applicant being considered by ensuring the District website and applicant database are user friendly and that personnel are accessible for assistance if needed.
- 1.4 Increase the awareness of equal employment opportunity among all personnel involved in hiring, and have the Superintendent, Human Resources Supervisor and/or Affirmative Action Officer monitor all hiring.
- 1.5 Ensure that accurate information is maintained regarding the demographic make-up of the District's workforce.
- 1.6 The selection process will be evaluated on an annual basis to ensure the quality and efficiency of the hiring process, particularly in regard to equity within the selection process.
- 1.7 Ensure hiring panel members are oriented to the specific job requirements.
- 1.8 Ensure bias-free selection processes by forming diverse hiring committees, evaluating potential employees on job-related criteria, and completing and maintaining necessary records such as interview rating forms of panel members.

## GOAL 2

### EDUCATION AND TRAINING

The District's goal is to promote a culture of respect and diversity in the workplace, and to ensure that members of the District community are aware of the Affirmative Action Plan and their roles and responsibilities in enforcing the District's policies concerning equal employment opportunity.

#### Strategies

- 2.1 Continue an emphasis on developing annual objectives and strategies at each building to increase gender equity and multi-cultural opportunities in both the instructional and activities programs. Each staff member has responsibility for carrying out the equal employment strategies as outlined in the Affirmative Action Plan adopted by the District.
- 2.2 Provide support for schools to develop and carry out multi-cultural and gender equity training programs and special projects.
- 2.3 Provide multi-cultural and/or cultural competence training for personnel at the elementary, middle school, and high school levels, in conjunction with incorporating multi-cultural and gender equity concepts, awareness, and information into the curriculum.
- 2.4 Provide regular training and emphasis on providing a working environment free from unlawful discrimination.
- 2.5 Create a culture within the District that is strongly supportive of diversity through ongoing professional development.
- 2.6 Other means of promotion and information dissemination will be utilized as necessary to ensure that the community and District staff are informed of the goals and objectives of equal employment opportunity.

## GOAL 3

### RETENTION OF QUALITY STAFF

#### Strategies

- 3.1 Human Resources will partner with other departments to create and maintain an integrated onboarding program to ensure employees have proper training, support, and direction when they begin their new career with the District.
- 3.2 Provide current employees with training and experience that will assist in qualifying them for career advancement.
- 3.3 Provide training and assessment to ensure staff are culturally aware and recognize the importance of a collaborative work environment.
- 3.4 Make no difference in conditions of employment including, but not limited to, hiring practices, leaves of absence, hours of employment and assignment of, or pay for, instructional and noninstructional duties.



## **IX. INTERNAL AUDIT AND REPORTING**

The District's Human Resources Department will maintain a confidential employee and applicant tracking system—separate from the pre-employment application process—which records the sex, race, ethnicity, age and disability and veteran status of applicants. Frequent monitoring of this data will help ensure that all applicants are receiving equal treatment in the hiring process and that the District's recruiting efforts are reaching all protected and nonprotected groups.

Annual reviews of the District's progress toward the goals set in this plan will be conducted by the District's Affirmative Action Officer and reported to all District administrators and to the School Board.

## X. SUPPORTIVE SYSTEMS

### Recruitment and Employment Plan

Human resources will consider all applicants and employees on the basis of job-related qualifications. The District selects employees as needed on the basis of merit, training and experience with no unlawful discrimination against any employee or applicant because of race, creed, color, national origin, age, gender, sexual orientation, including gender identity, marital status or qualified individuals with disabilities. In addition, the District selects employees without preferential treatment on the basis of race, sex, ethnicity or national origin. A continuing review of hiring criteria is made to ensure the relevance of the job qualifications to the tasks to be performed and the needs of the position.

In addition, the District promotes continued relationships with organizations that are a recruitment source for individuals from protected groups, including those groups that currently may be underutilized in the workforce. These organizations include such agencies as the state job service agencies and college and university placement offices.

The District has a distribution list containing names and addresses of those agencies to which job announcements are sent. Job announcements are distributed to each employee in the District via email, transmitted to each outside employment and referral source on the distribution list, and listed on the District's web site at [www.bremertonschools.org](http://www.bremertonschools.org). Jobs may also be advertised in on recruiting websites or social media.

Specific emphasis will be placed on the outreach and recruitment of members of protected groups along with the efforts made to reach nonprotected groups. Recipient listings for classified job announcements will be reviewed to ensure continued inclusion of agencies serving minority communities, as well as other protected and nonprotected groups.

Consistent with the District's equal employment opportunity policy, and in addition to other measures described in this Plan:

1. Publicity for job openings may include, without limitation, informing professional groups and organizations, with memberships that include both protected and nonprotected groups; visiting areas to promote a diverse population of qualified applicants; and listing job openings, including minimum qualifications, on the District's web site.
2. All staff will be encouraged to facilitate recruitment of a diverse pool of qualified applicants, including individuals from underrepresented protected groups.
3. Community organizations representing the special interests of protected groups will be notified of the District's recruiting efforts.
4. All subcontractors, vendors, and suppliers will be notified in writing of the District's equal employment policy.

5. All recruiting sources, including minority, women's, disabled and veteran's groups, will be notified in writing of equal employment.

### Training

The District recognizes the importance of on-going training for employees both to assist in upgrading skills and to assist in personal growth. The District will continue to develop and provide career counseling to staff to assist personnel in moving to levels of greater responsibility.

## **XI. REDUCTION IN FORCE**

The District's reduction in force ("RIF") procedures for bargaining unit positions are established by collective bargaining agreements. Seniority within the appropriate job group is the principal factor determining retention. Affirmative action is not currently a factor in negotiated RIF procedures. RIF procedures for administrative and other exempt positions are established by school board policy and do not explicitly address Affirmative Action. If a RIF is necessary, consistent with its legal and contractual obligations, the District will make reductions in force bearing in mind its commitment to equal employment opportunity.

**Nondiscrimination and Affirmative Action**Nondiscrimination

The District will provide equal employment opportunity and treatment for all applicants and staff in recruitment, hiring, retention, assignment, transfer, promotion and training. Such equal employment opportunity will be provided without discrimination with respect to race, creed, religion, color, national origin, age, honorably-discharged veteran or military status, sex, sexual orientation including gender expression or identity, marital status, the presence of any sensory, mental or physical disability, or the use of a trained dog guide or service animal by a person with a disability. -

The Superintendent (Board) will designate a staff member to serve as the Compliance Officer.

Affirmative Action

The District, as a recipient of public funds, is committed to undertake affirmative action which will make effective equal employment opportunities for staff and applicants for employment. Such affirmative action shall include a review of programs, the setting of goals and the implementation of corrective employment procedures to increase the ratio of aged, persons with disabilities, ethnic minorities, women and Vietnam veterans who are under-represented in the job classifications in relationship to the availability of such persons having requisite qualifications. Affirmative action plans may not include hiring or employment preferences based on gender or race, including color, ethnicity or national origin. Such affirmative action will also include recruitment, selection training, education and other programs.

The Superintendent will develop an affirmative action plan which specifies the personnel procedures to be followed by the staff of the District and will ensure that no such procedures discriminate against any individual. Reasonable steps will be taken to promote employment opportunities of those classes that are recognized as protected groups - aged, persons with disabilities, ethnic minorities and women and Vietnam veterans, although under state law, racial minorities and women may not be treated preferentially in public employment.

This policy, as well as the affirmative action plan, regulations and procedures developed according to it, will be disseminated widely to staff in all classifications and to all interested patrons and organizations. Progress toward the goals established under this policy will be reported annually to the Board.

Employment of Persons with Disabilities

In order to fulfill its commitment of nondiscrimination to those with disabilities, the following conditions will prevail:

1. No qualified person with disabilities will, solely by reason of a disability, be subjected to discrimination, and the District will not limit, segregate or classify any applicants for employment or any staff member in any way that adversely affects his/her opportunities or status because of a disability. This prohibition applies to all aspects of employment

from recruitment to promotions and includes fringe benefits and other elements of compensation.

2. The District will make reasonable accommodation to the known physical or mental limitations of an otherwise qualified disabled applicant or staff member unless it is clear that an accommodation would impose an undue hardship on the operation of the District program. Such reasonable accommodations may include:
  - a. making facilities used by staff readily accessible and usable by persons with disabilities; and
  - b. job restructuring, part-time or modified work schedules, acquisition or modification of equipment or devices, the provision of readers or interpreters and other similar actions.

In determining whether or not accommodation would impose an undue hardship on the District, factors to be considered include the nature and cost of the accommodation.

3. The District will not use ~~of~~ any employment test or criteria that screens out persons with disabilities unless the test or criteria is clearly and specifically job-related. Also, the District will not use such tests or criteria if alternative tests or criteria (that do not screen out persons with disabilities) are available.
4. While the District may not make pre-employment inquiry as to whether an applicant has a disability or as to the nature and severity of any such disability, it may inquire into an applicant's ability to perform job-related functions.
5. Any staff member who believes that there has been a violation of this policy or the law prohibiting discrimination because of a disability may initiate a grievance through the procedures for staff complaints.

#### Nondiscrimination for Military Service

The District will not discriminate against any person who is a member of, applies to be a member, or performs, has performed, applies to perform, or has an obligation to perform service in a uniformed service, on the basis of that participation in a uniformed service. This includes initial employment, retention in employment, promotion, or any benefit of employment. The District will also not discriminate against any person who has participated in the enforcement of these rights under state or federal law.

Cross References:	2030 – Service Animals in Schools 5270 – Resolution of Staff Complaints 5407 – Military Leave
Legal Reference:	RCW 28A.400.310      Law against discrimination applicable to district's employment practices RCW 28A.640.020      Regulations, guidelines to eliminate discrimination—Scope—Sexual harassment policies RCW 28A.642      Discrimination prohibition RCW 49.60      Discrimination – Human rights commission RCW 49.60.030      Freedom from discrimination – Declaration of civil rights RCW 49.60.180      Unfair practices of employers RCW 49.60.400      Discrimination, preferential treatment prohibited RCW 73.16      Veterans and veterans’ affairs-- Employment and Re-Employment WAC 392-190      Equal Education Opportunity – Unlawful Discrimination Prohibited WAC 392-190-0592      Public School Employment – Affirmative Action Program 42 USC 2000e1-200e10      Title VII of the Civil Rights Act of 1964 20 USC § 1681-1688      Title IX Educational Amendments of 1972 42 USC § 12101-12213      Americans with Disabilities Act 8 USC 1324      Immigration Reform and Control Act (IRCA) of 1986 38 USC §§ 4301-4333      Uniformed Services Employment and Reemployment Rights Act 29 USC 794      Vocational Rehabilitation Act of 1973 34 CFR §104      Nondiscrimination on the basis of handicap in programs or activities receiving federal financial assistance 38 USC 4212      Vietnam Era Veterans Readjustment Act Of 1974 (VEVRAA)
Management Resources:	<b><u>2018 – May Policy Issue</u></b> <b><u>2017 – April Issue</u></b> 2014 – December Issue 2013 – June Issue 2011 – June Issue 2011 – February Issue <i>Policy News</i> , August 2007 Washington’s Law Against Discrimination <i>Policy News</i> , June 2001 State Updates Military Leave Rights

Bremerton School District

Adopted:	<u>8/19/99</u>	_____	_____
Revised:	<u>10/19/00</u>	<u>08/16/07</u>	<u>10/20/11</u>
	<u>3/19/15</u>	<u>Draft July 2020</u>	_____
Affirmed:	_____	_____	_____

## APPENDIX B

Bremerton School District  
Affirmative Action Officer

Name: Garth Steedman, Assistant Superintendent Finance, Operations, &  
Human Resources

Address: 134 Marion Avenue North, Bremerton, WA 98312

Telephone Number: (360) 473-1026

Email: **garth.steedman@bremertonschools.org**

Fax Number: (360) 473-1020



**Board of Directors**

Jonee Dubos – President  
Carolynn Perkins – Vice President  
Karen Bolton – Member  
John Hurley – Member  
Alyson Rotter - Member

**Superintendent**

Aaron Leavell

**Affirmative Action/Title IX Officer**

Garth Steedman Assistant Superintendent  
Finance, Operations, & Human Resources.  
(360) 473-1026

**Section 504 Compliance Officer**

John Welsh, Principal, Naval Avenue Elementary  
(360) 473-4400

U.S. Department of Education, Office for Civil Rights, Region X  
Henry M. Jackson Federal Building  
Mail Code 10-9010  
915 Second Avenue  
Seattle, WA 98174-1099

**Bremerton School District**

134 Marion Avenue North Bremerton, WA 98312  
TEL (360) 473-1026  
FAX (360) 473-1020

The Bremerton School District provides equal educational and employment opportunity without regard to race, creed, color, national origin, age, gender, sexual orientation, including gender identity, marital status, qualified individuals with disabilities and other bases protected by applicable law.

Inquiries regarding compliance or complaint procedures may be directed to the School District's Title IX Officer/Section 504/RCW 28A.640 Compliance Officer or to the U.S. Department of Education, Office for Civil Rights.