

BREMERTON
SCHOOL DISTRICT



AFFIRMATIVE ACTION PLAN
2010-2015

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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 Director of Personnel.
- 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 2010-2015 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 2010-2015 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/AffirmativeAction/resources.aspx>

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 2010-2015 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 2000 to create summary reports for Kitsap County.¹ The data in the reports indicate that the percentage of minorities² in the Kitsap County civilian workforce³ is 12.18% and the percentage of women is 47.83%. This compares to minorities comprising 12.73%, and women 49.80%, of

¹ Available at <http://www.ofm.wa.gov/census2000/dp58/co/035.pdf>.

² Census 2000 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.

³ For the purposes of this Plan, "workforce" includes non-military persons age 16 and over in the workforce according to Census 2000 data.

the overall population age 16 and over. In the available labor force, 1.08% were identified as unemployed minorities and 2.94% were identified as unemployed women. The data identified disabled individuals in Kitsap County as 18.28% of the general population⁴ and employed disabled individuals comprised 6.22% of the general population. Persons age forty and over comprise 32.23% of the overall population in Kitsap County.⁵ The population of Vietnam-era veterans in Kitsap County is 5.70% of the overall population.⁶ Disabled veterans comprise approximately 1.96% of the County's available workforce.⁷ The underlined figures are utilized as the theoretical availability figure, or "TA," in the utilization studies below.

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, 2009.

⁴ The relevant general population for disabled individuals is only individuals age five and older in Kitsap County. The Census does not track disabilities in individuals under age five.

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

⁶ This number was calculated by conducting a query for all Vietnam-era veterans in Kitsap County in the Summary File 3 database, matrix P40, on the U.S. Census website (excluding those that served in WWII and the Korean War; result = 13,233) and then dividing by the total population of the County (231,969). Available at: <http://factfinder.census.gov>.

⁷ The U.S. Department of Labor, Bureau of Labor Statistics released a report on the employment situation of veterans in which it estimated that 11% of all veterans have a service-related disability. Available at <http://www.bls.gov/news.release/pdf/vet.pdf>. It also reported that of those with a service-related disability, only 49.1% are in the civilian labor force. The theoretical availability used here is derived by multiplying the number of veterans in Kitsap County (37,892) by 11% to arrive at the number of disabled veterans in the County (4,168) and then by 49.1% to estimate the number of those disabled veterans available in the civilian workforce (2,046). This number was then divided by the total number of persons in the civilian workforce in Kitsap County (104,431) to arrive at 1.96%.

	Salary Range	Veteran Lead. Stipend
Teachers and Support Services	\$34,236 to \$64,531	\$818 to \$2,455
Certificated Administrators	\$79,974 to \$141,500	
Classified Administrators	\$57,325 to \$104,194	
Classified Assistants	\$12.43 to \$15.84 per hour	
Other Classified	\$10.06 to \$26.65 per hour	

D. Utilization Studies – Charts D1 through D7

CHART D1

**Bremerton School District
Utilization Analysis
Minorities – October 2009
(Yellow fill indicates underutilization)**

Job Group	Total Employees	Total Minority	% Total Minority	Black/Af. Am.	Asian/ Pacific Islander	Hispan. Origin	Indian/ Esk./ Aleut	Theoretical Availability	Statistically Expected Utilization	Deviation from TA	Deviation from SEU
Certificated Admin	23	3	13.04%	1	1	1	0	12.18%	9.74%	-0.86%	-3.30%
Teachers	311	23	7.40%	5	6	10	2	12.18%	9.74%	5.40%	2.34%
Cert Support Personnel	29	1	3.45%	0	0	1	0	12.18%	9.74%	8.73%	6.29%
Classified Admin	8	0	0.00%	0	0	0	0	12.18%	9.74%	12.18%	9.74%
Classified Assistants	133	12	9.02%	3	5	4	0	12.18%	9.74%	3.16%	0.72%
Other Classified	198	25	12.63%	9	8	5	3	12.18%	9.74%	-0.45%	-2.89%
Total	702	64	9.12%	18	20	21	5	12.18%	9.74%	3.06%	0.63%

CHART D2

**Bremerton School District
Utilization Analysis
Females - October 2009**

Job Group	Total Employees	Total Females	% Total Females	Theoretical Availability	Statistically Expected Utilization	Deviation from TA	Deviation from SEU
Certificated Admin	23	11	47.83%	47.83%	38.26%	0.00%	-9.56%
Teachers	311	233	74.92%	47.83%	38.26%	-27.09%	-36.66%
Cert Support Personnel	29	23	79.31%	47.83%	38.26%	-31.48%	-41.05%
Classified Admin	8	4	50.00%	47.83%	38.26%	-2.17%	-11.74%
Classified Assistants	133	118	88.72%	47.83%	38.26%	-40.89%	-50.46%
Other Classified	198	140	70.71%	47.83%	38.26%	-22.88%	-32.44%
Total	702	529	75.36%	47.83%	38.26%	-27.53%	-37.09%

CHARTS D3 AND D4

**Bremerton School District
Utilization Analysis
Veterans**

(Yellow fill indicates underutilization)

Vietnam Veterans – October 2009

Job Group	Total Employees	Total Vietnam Veterans	% Total Vietnam Veterans	Theoretical Availability	Statistically Expected Utilization	Deviation from TA	Deviation from SEU
Certificated Admin	23	0	0.00%	5.70%	4.56%	5.70%	4.56%
Teachers	311	13	4.18%	5.70%	4.56%	1.52%	0.38%
Cert Support Personnel	29	0	0.00%	5.70%	4.56%	5.70%	4.56%
Classified Admin	8	1	12.50%	5.70%	4.56%	-6.80%	-7.94%
Classified Assistants	133	2	1.50%	5.70%	4.56%	4.20%	3.06%
Other Classified	198	7	3.54%	5.70%	4.56%	2.16%	1.02%
Total	702	23	3.28%	5.70%	4.56%	2.42%	1.28%

Disabled Veterans – October 2009

(Yellow fill indicates underutilization)

Job Group	Total Employees	Total Disabled Veterans	% Total Disabled Veterans	Theoretical Availability	Statistically Expected Utilization	Deviation from TA	Deviation from SEU
Certificated Admin	23	0	0.00%	1.96%	1.57%	1.96%	1.57%
Teachers	311	3	0.96%	1.96%	1.57%	1.00%	0.60%
Cert Support Personnel	29	0	0.00%	1.96%	1.57%	1.96%	1.57%
Classified Admin	8	0	0.00%	1.96%	1.57%	1.96%	1.57%
Classified Assistants	133	1	0.75%	1.96%	1.57%	1.21%	0.82%
Other Classified	198	2	1.01%	1.96%	1.57%	0.95%	0.56%
Total	702	6	0.85%	1.96%	1.57%	1.11%	0.71%

CHART D5

**Bremerton School District
Utilization Analysis
Disabled – October 2009
(Yellow fill indicates underutilization)**

Job Group	Total Employees	Total Disabled	% Total Disabled	Theoretical Availability	Statistically Expected Utilization	Deviation from TA	Deviation from SEU
Certificated Admin	23	1	4.35%	6.22%	4.98%	1.87%	0.63%
Teachers	311	21	6.75%	6.22%	4.98%	-0.53%	-1.78%
Cert Support Personnel	29	0	0.00%	6.22%	4.98%	6.22%	4.98%
Classified Admin	8	0	0.00%	6.22%	4.98%	6.22%	4.98%
Classified Assistants	133	6	4.51%	6.22%	4.98%	1.71%	0.46%
Other Classified	198	11	5.56%	6.22%	4.98%	0.66%	-0.58%
Total	702	39	5.56%	6.22%	4.98%	0.66%	-0.58%

CHART D6

**Bremerton School District
Utilization Analysis
Persons Age Forty and Over – October 2009**

Job Group	Total Employees	Total Persons Age 40 and Over	% Total Persons Age 40 and Over	Theoretical Availability	Statistically Expected Utilization	Deviation from TA	Deviation from SEU
Certificated Admin	23	21	91.30%	32.23%	25.78%	-59.07%	-65.52%
Teachers	311	221	71.06%	32.23%	25.78%	-38.83%	-45.28%
Cert Support Personnel	29	22	75.86%	32.23%	25.78%	-43.63%	-50.08%
Classified Admin	8	7	87.50%	32.23%	25.78%	-55.27%	-61.72%
Classified Assistants	133	105	78.95%	32.23%	25.78%	-46.72%	-53.16%
Other Classified	198	177	89.39%	32.23%	25.78%	-57.16%	-63.61%
Total	702	553	78.77%	32.23%	25.78%	-46.54%	-52.99%

VI. UTILIZATION ANALYSIS BY JOB CATEGORY - IDENTIFICATION OF PROBLEM AREAS

A. **Certificated Administrators.** This job category includes principals, assistant principals, superintendent, assistant superintendent, special education, special programs and vocational directors, and the coordinator of educational technology.

	2009	2009 % of Group	2004	2004 % of Group
Minorities	3	13.04%	2	7.41%
Females	11	47.83%	12	44.44%
Disabled	1	4.35%	1	3.70%
Vietnam Vet	0	0.00%	No Data	No Data
Disabled Vet	0	0.00%	No Data	No Data
Over 40	21	91.30%	20	74.07%

This analysis indicates that representation of minorities and persons age 40 and over in this job group significantly exceeds the theoretical availability (“TA”) and statistically expected utilization (“SEU”) figures. The representation of women is exactly the same as the TA. There is no identified underutilization of these groups.

The percentages in all categories have increased since 2004.

Persons with disabilities and Vietnam-era veterans are underutilized in this group. Their deviations from the SEU are, respectively, 0.63% and 4.56%. The number of persons with disabilities remained fairly constant between 2004 and 2010 with a slight gain of 0.65%. The District relies on its affirmative action data collection process, which entails voluntary reporting, for these affirmative action numbers. Employees may be more reluctant to self-report disability status than other demographic information, as a matter of privacy. The District is nevertheless committed to its policy of nondiscrimination on the basis of disability.

These findings will be considered as the District plans and implements its future recruitment efforts to ensure that members of the underutilized groups are reached by such efforts. Staff responsible for hiring and promotion will be given information designed to sensitize them to the potential for discrimination, particularly in areas of underutilization. This information will be reviewed in meetings with the management team.

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

	2009	2009 % of Group	2004	2004 % of Group
Minorities	23	7.40%	18	5.29%
Females	233	74.92%	239	70.29%
Disabled	21	6.75%	23	6.76%
Vietnam Vet	13	4.18%	No Data	No Data
Disabled Vet	3	0.96%	No Data	No Data
Over 40	221	71.06%	251	73.82%

This analysis indicates that representation of women and persons age 40 and over significantly exceeds the TA and SEU figures for this job classification. These groups are not underutilized.

The analysis indicates that the number of ethnic minorities has increased 2.11% since 2004, representing improvement in the utilization of this group. Minorities are still underutilized, with a deviation from the SEU of 2.34%. This is a reduction from the 2004 SEU deviation of 4.45%.

Vietnam-era veterans are slightly underutilized in this group. The deviation from SEU for Vietnam-era veterans is 0.38%. Persons with disabilities exceed the SEU by 1.77%. This figure has remained relatively stable since 2004. The District relies on its affirmative action data collection process, which entails voluntary reporting, for these affirmative action numbers. Employees may be more reluctant to self-report disability status than other demographic information, as a matter of privacy. The District is nevertheless committed to its policy of nondiscrimination on the basis of disability.

We note that the TA and SEU figures used for Vietnam-era veterans in this study are based on Census 2000 numbers. Given the passage of time, the District anticipates that the number of Vietnam-era veterans in the workforce has declined substantially below the 5.70% TA based on this data. Nevertheless, the District remains committed to equal employment opportunities for all veterans.

These findings will be considered as the District plans and implements its future recruitment efforts to ensure that members of the underutilized groups are reached by such efforts. Staff responsible for hiring and promotion will be given information designed to sensitize them to the potential for discrimination, particularly in areas of underutilization. This information will be reviewed in meetings with the management team.

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.

	2009	2009 % of Group	2004	2004 % of Group
Minorities	1	3.45%	0	0
Females	23	79.31%	31	75.61%
Disabled	0	0.00%	3	7.32%
Vietnam Vet	0	0.00%	No Data	No Data
Disabled Vet	0	0.00%	No Data	No Data
Over 40	22	75.86%	34	82.93%

This analysis indicates that representation of women and persons age 40 and over in this group significantly exceeds the TA and SEU figures for this job classification. There is no identified underutilization of these groups.

The analysis indicates that ethnic minorities are underutilized in this job category with a deviation from the SEU of 6.29%. Both the total number and percentage of minorities in this job category have increased since 2004. The percentage has risen from 0.00% to 3.45%, representing a positive trend towards greater utilization of this group.

Persons with disabilities are underutilized in this group. The deviation from SEU is 4.98%. There was a significant decrease in persons with disabilities in this category since 2004. The District relies on its affirmative action data collection process, which entails voluntary reporting, for these affirmative action numbers. Employees may be more reluctant to self-report disability status than other demographic information, as a matter of privacy. The District is nevertheless committed to its policy of nondiscrimination on the basis of disability.

Vietnam-era and disabled veterans are significantly underutilized in this group. There are no Vietnam-era veterans or disabled veterans in this group. We note that the TA and SEU figures used for Vietnam-era veterans in this study are based on Census 2000 numbers. Given the passage of time, the District anticipates that the number of Vietnam-era veterans in the workforce has declined substantially below the 5.70% TA based on this data. This job category is historically difficult to fill with qualified candidates due to opportunities available to such professionals in the private sector. Nevertheless, the District remains committed to equal employment opportunities for all veterans.

These findings will be considered as the District plans and implements its future recruitment efforts to ensure that members of the underutilized groups are reached by such efforts. Staff responsible for hiring and promotion will be given information designed to sensitize them to the potential for discrimination, particularly in areas of underutilization. This information will be reviewed in meetings with the management team.

- D. **Classified Administrators.** This job category includes classified directors and supervisors such as the directors of personnel and finance and operations; the supervisors of business operations, facilities, child nutrition services, transportation, and custodial services; and the coordinator of community relations and communication.

	2009	2009 % of Group	2004	2004 % of Group
Minorities	0	0.00%	1	11.11%
Females	4	50.00%	3	33.33%
Disabled	0	0.00%	1	11.11%
Vietnam Vet	1	12.50%	No Data	No Data
Disabled Vet	0	0.00%	No Data	No Data
Over 40	7	87.50%	9	100%

This analysis indicates that representation of women, Vietnam-era veterans, and persons age 40 and over in this job classification exceeds the SEU figures. There is no identified underutilization of these groups.

The representation of ethnic minorities, disabled, and persons over the age of 40 has decreased since 2004. Because this group includes a total of eight employees, the increase or decrease by one employee can dramatically impact overall percentages. However, these findings will be considered as the District plans and implements its future recruitment efforts to ensure that members of the underutilized groups are reached by such efforts.

- 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.

	2009	2009 % of Group	2004	2004 % of Group
Minorities	12	9.02%	15	10.87%
Females	118	88.72%	131	94.93%
Disabled	6	4.51%	9	6.52%
Vietnam Vet	2	1.50%	No Data	No Data
Disabled Vet	1	0.75%	No Data	No Data
Over 40	105	78.95%	114	82.61%

This analysis indicates that representation of women and persons age 40 and over in this job classification exceeds the TA and SEU figures. The representation of minorities is 0.72% below the SEU figure.

This analysis indicates that representation of minorities has declined by 1.85% since 2004. There continues to be an underutilization of minorities within this job classification.

Persons with disabilities and Vietnam-era veterans are underutilized in this group. Persons with disabilities dropped by 2.01% since 2004. The District relies on its affirmative action data collection process, which entails voluntary reporting, for these affirmative action numbers. Employees may be more reluctant to self-report disability status than other demographic information, as a matter of privacy. The District is committed to its policy of nondiscrimination on the basis of disability.

There is one disabled veteran in this group, representing 0.75%. This group is therefore identified as underutilized. The District remains committed to equal employment opportunities for all veterans.

These findings will be considered as the District plans and implements its future recruitment efforts to ensure that members of the underutilized groups are reached by such efforts. Staff responsible for hiring and promotion will be given information designed to sensitize them to the potential for discrimination, particularly in areas of underutilization. This information will be reviewed in meetings with the management team.

- 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.

	2009	2009 % of Group	2004	2004 % of Group
Minorities	25	12.63%	28	13.93%
Females	140	70.71%	140	69.65%
Disabled	11	5.56%	9	4.48%
Vietnam Vet	7	3.54%	No Data	No Data
Disabled Vet	2	1.01%	No Data	No Data
Over 40	177	89.39%	167	83.08%

This analysis indicates that representation of ethnic minorities, women and persons age 40 and over in this job classification exceeds the TA and SEU figures. There is no identified underutilization of these groups.

Disabled veterans are not significantly underutilized. The deviation from SEU is 0.56%.

Persons with disabilities exceed the SEU by 0.58%. Both the number and percentage of employees with disabilities have increased since 2004. The District relies on its affirmative action data collection process, which entails voluntary reporting, for these affirmative action numbers. Employees may be more reluctant to self-report disability status than other demographic information, as a matter of privacy. The District is committed to its policy of nondiscrimination on the basis of disability.

Vietnam-era veterans are underutilized in this group. The deviation from SEU is 1.02%. The District remains committed to equal employment opportunities for all

veterans.

These findings will be considered as the District plans and implements its future recruitment efforts to ensure that members of the underutilized groups are reached by such efforts.

- G. This review shows that there has been an increase since 2004 in the percentage of minorities in the District's certificated administrative, teaching and certificated support staff. Certificated administrators have increased from 7.41% to 13.04% the teaching staff has increased from 5.29% to 7.40%, and the certificated support staff has increased from 0.00% to 3.45%. However, the District's total minority workforce underutilizes the SEU for minority employees by 0.62%.
- 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, Vietnam-era veterans and disabled veterans are underutilized in many job classifications. Potential reasons for such underutilization are analyzed above. Overall, the percentage of persons with disabilities exceeds the SEU by 0.58%. The District remains committed to its policy against discrimination on the basis of disability and veteran status.
- 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.

VII. GOALS AND ACTION PROGRAMS TO ACHIEVE GOALS

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.

Action Programs

- 1.1 Analyze job descriptions and the hiring process 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.
- 1.3 Explore flex time and job sharing options as a means of enhancing positions for protected groups and other applicants.
- 1.4 Increase the awareness of equal employment opportunity among all personnel involved in hiring, and have the Superintendent, Director of Personnel 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.

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.

Action Programs

- 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

PREVENTING EMPLOYMENT DISCRIMINATION BASED ON SEX

We include this goal and the following objectives to ensure that the District does not discriminate against any person on the basis of sex in employment, recruitment, promotion or advancement, and in order to incorporate the requirements of WAC 392-200-015.

Action Programs

- 3.1 Maintain credential requirements for all personnel.
- 3.2 Make no differentiation in pay scale on the basis of sex.
- 3.3 Make no differentiation in the assignment of school duties on the basis of sex, except where there is a compelling need for such qualification based on the nature of the duties; e.g. an assignment that involves supervising students in areas or situations where persons might be disrobed.
- 3.4 Provide the same opportunities for advancement without regard to sex.
- 3.5 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 on the basis of sex.

VIII. INTERNAL AUDIT AND REPORTING

The District's Personnel 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.

IX. SUPPORTIVE SYSTEMS

Recruitment and Employment Plan

The Personnel Office considers 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 mailed. 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. Jobs may also be advertised in newspapers.

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.

X. 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.

APPENDIX A

Nondiscrimination and Affirmative Action – Policy 5010

Nondiscrimination

The District shall provide equal employment opportunity and treatment for all applicants and staff in recruitment, hiring, retention, assignment, transfer, promotion and training. Such equal employment opportunity shall be provided without discrimination with respect to race, creed, color, national origin, age, gender, sexual orientation, including gender identity, marital status or qualified individuals with disabilities.

The Superintendent shall designate a staff member to serve as affirmative action/Title IX Compliance officer.

Affirmative Action

The District is committed to undertake affirmative action which shall 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, disabled, ethnic minorities and women 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 shall also include recruitment, training, education and other programs.

The Superintendent shall develop an affirmative action plan which specifies the personnel procedures to be followed by the staff of the District and shall ensure that no such procedures discriminate against any individual. Reasonable steps shall be taken to promote employment opportunities of those classes that are recognized as protected groups - aged, handicapped, 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, shall be disseminated widely to staff in all classifications and to all interested patrons and organizations. Progress toward the goals established under this policy shall 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 shall prevail:

1. No qualified person with disabilities shall, solely by reason of a disability, be subjected to discrimination, and the District shall 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 shall 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 shall not make use of any employment test or criteria that screens out persons with disabilities unless:
 - a. the test or criteria is clearly and specifically job-related and
 - b. 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 in 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.

Legal Reference:	RCW 28A.400.310 28A.640.020 49.60 49.60.030 49.60.180 49.60.400 Chapter 73.16 RCW	Law against discrimination applicable to district's employment practices Regulations, guidelines to eliminate discrimination--Scope Law Against Discrimination Freedom from discrimination Unfair practices of employer defined Affirmative action, discrimination prohibited (I-200) Employment and Re-Employment
	WAC 162-22-050 392-200 392-200-010 392-200-015	Unfair practice Employment Discrimination Public school employment and contract practices--Sex discrimination Public school employment--Affirmative action program
	Title VII of the Civil Rights Act of 1964 Title IX Title IX 8 USC 1324a and 1324b 38 USC §§ 2021-2024 42 U.S.C. SS 12101-12213 29 U.S.C. 706 Executive Order 11246 45 CFR 84, Sec 504	Act of 1964 Educational Amendments of 1972 Education Amendments of 1974 Immigration Reform and Control Act (IRCA) of 1986 Uniformed Services Employment and Reemployment Rights Act Americans with Disabilities Act Amended By Executive Order 11375 Vocational Rehabilitation Act of 1973

Bremerton School District

Adopted:	8/19/99	_____	_____
Revised:	10/19/00	08/16/07	_____
Affirmed:	_____	_____	_____

APPENDIX B

Bremerton School District Affirmative Action Officer

Name: Denise Zaske, Director of Personnel
Address: 134 Marion Avenue North, Bremerton, WA 98312
Telephone Number: (360) 473-1026
Email: denise.zaske@bsd.wednet.edu
Fax Number: (360) 473-1020

Board of Directors

David Boynton – President
Carolynn Perkins – Vice President
Vicki Collins – Member
Louis Mitchell – Member
Scott Rahm - Member

Superintendent

Lester “Flip” Herndon

Affirmative Action/Title IX Officer
Denise Zaske, Director of Personnel
(360) 473-1026

Section 504 Compliance Officer
Michael Sellers, Principal, Armin Jahr Elementary
(360) 473-4100

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.