

**EXECUTIVE ORDER 11246 AFFIRMATIVE ACTION PLAN (AAP)**

**for**

**NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY  
COLLEGE  
7000 Dandini Blvd  
RENO, NEVADA 89512**

**Affirmative Action Program**

**January 1, 2023 - December 31, 2023**

**PART I: AAP FOR MINORITIES AND WOMEN**

**PART II: AAP FOR PROTECTED VETERANS  
AND INDIVIDUALS WITH DISABILITIES**

**AA/EEO Contact:**

**NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS  
COMMUNITY COLLEGE  
7000 Dandini Blvd  
RENO, NEVADA 89512**

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**NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY  
COLLEGE AAP**

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**NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY  
COLLEGE**

**PART I: AFFIRMATIVE ACTION PLAN FOR MINORITIES AND WOMEN**

**FOR**

**January 1, 2023 - December 31, 2023**

**PART I**

**AAP FOR MINORITIES AND WOMEN**

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## **PART I: AAP FOR MINORITIES AND WOMEN**

### **CHAPTER 1: DESIGNATION OF RESPONSIBILITY 41 C.F.R. § 60-2.17(a)**

As part of its efforts to ensure equal employment opportunity to all individuals, NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE has designated the following personnel for designing and ensuring the effective implementation of the company's Affirmative Action Programs.

#### TMCC President

The primary responsibility and accountability for implementing the AAP rests with the TMCC President. This person is responsible, through the Human Resources Director, for adherence to NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE's policy of equal employment opportunity and affirmative action. This role includes, but is not limited to, the following duties:

1. Designate appropriate personnel with the responsibility for overseeing, administering, implementing, and monitoring NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE's AAP. Ensure that these personnel are identified in writing by name and job title.
2. Ensure that those designated personnel responsible for all AAP components are given the necessary authority and top management support and staffing to successfully implement their assigned responsibilities.
3. Impart the personal direction that ensures total involvement and commitment to equal employment opportunity programs through NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE's AAP.

#### Human Resources Director

The Human Resources Director is responsible for overall supervision of the AAP. The Human Resources Director ensures, through the department managers and supervisors, that all relevant policies and procedures are adhered to. Successful implementation of this program is a basis for evaluating the Human Resources Director's effective work performance. The Human Resources Director's responsibilities include, but are not limited to, the following:

1. Ensure that NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE adheres to the stated policy of equal employment opportunity, and monitor the application of equal employment opportunity policies.
2. Ensure that the AAP is reviewed and updated annually in accordance with NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE's stated policy.
3. Participate in periodic discussions with management, supervision, and all other employed personnel to ensure AAP and equal employment opportunity policies are being followed.

4. Review the qualifications of all employees to ensure equitable opportunity, based on job-related employment practices, is given to all for transfers and promotions.
5. Conduct periodic audits of: 1) training programs and hiring and promotion patterns to remove impediments to the attainment of AAP goals and objectives, 2) facilities to ensure they are maintained for the use and benefit of all employees and integrated both in policy and practice, and 3) sponsored educational, training, recreational, and social activities to ensure that all employees are encouraged to participate in accordance with policies on non-discrimination.
6. Ensure that all new employees receive a special orientation to NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE's equal employment opportunity policy and are thoroughly informed with regard to the AAP and its objectives.
7. Periodically analyze applicant flow to determine the mix of persons applying for employment by race/ethnic origin and gender.
8. Ensure that recruitment advertising is placed in minority and female-oriented publications, as applicable.
9. Review all job descriptions and specifications to ensure they are free of discriminatory provisions and artificial barriers. Ensure that all requirements are job-related, that they are realistic, and that they reflect the actual work requirements of the essential job duties.
10. Provide direction to NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE's employees, as necessary, to carry out all actions required to meet the Company's equal employment opportunity and affirmative action commitments.
11. Review, report on, and update NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE's AAP at least on an annual basis in accordance with stated policy.
12. Responsible for the design and effective implementation of the AAP at all establishments.
13. Develop, implement, and maintain audit and reporting systems to measure effectiveness of equal employment opportunity programs, including those that will indicate the need for remedial action and determine the degree to which goals and objectives have been obtained.
14. Advise management in the modification and development of NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE's policies to ensure the enhancement of equal employment opportunity for all employees and potential employees within existing equal employment opportunity guidelines.
15. Conduct periodic audits to ensure all required posters and those advertising NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE's equal employment opportunity policies and AAP are displayed and that NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE's equal employment opportunity and AAP policies are being thoroughly communicated.

16. Assist in review and revision of all policies, procedures, and rules to ensure they are not in violation of federal or state laws and regulations.

### Managers and Supervisors

In their direct day-to-day contact with NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE's employees, managers and supervisors have assumed certain responsibilities to help the Company ensure compliance with equal employment opportunity programs and effective implementation of the AAP. These include, but are not limited to, the following:

1. Aggressively adhere to NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE's equal employment opportunity and affirmative action policy.
  - A. Support and assist the Human Resources Director in developing, maintaining, and successfully implementing the AAP.
  - B. Complete progress reports regarding the status of goal achievement.
  - C. Take action to prevent harassment of employees placed through affirmative action efforts.
2. Assign employees to significant jobs that might lead to greater personal growth and value, and counsel them with respect to what is needed for upward mobility within the employment structure.
3. Ensure that all interviews, offers of employment and/or wage commitments are consistent with NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE's policy.
4. Implement the internal promotion and transfer of all employees under their supervision consistent with AAP goals and objectives.
5. Assist in identifying problem areas and provide needed information for establishing and meeting department affirmative action goals and objectives.



**Chapter 2: Identification of Problem Areas**  
**41 C.F.R. § 60-2.17(b)**

NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE performs in-depth analyses of its total employment process to determine whether and where impediments to equal employment opportunity might exist. At a minimum, NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE evaluates:

1. The workforce by organizational unit and AAP job group to determine whether there are problems of minority or female utilization (*i.e.*, employment in the unit or AAP group), or of minority or female distribution (*i.e.*, placement in the different jobs within the unit or AAP job group);
2. Personnel activity (applicant flow, hires, terminations, promotions, and other personnel actions) to determine whether there are selection disparities;
3. Compensation systems to determine whether there is gender-, race-, or ethnicity-based disparities;
4. Selection, recruitment, referral, and other personnel procedures to determine whether they result in disparities in the employment or advancement of minorities or women; and
5. Any other areas that might impact the success of the affirmative action program.

In each case where potential problem areas have been identified, affirmative actions, as appropriate, will be taken consistent with any of the action-oriented programs described in Chapter 3 of this AAP.

**CHAPTER 3: ACTION-ORIENTED PROGRAMS**  
**41 C.F.R. § 60-2.17(c)**

NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE tailors our action-oriented programs each year to ensure they are specific to the problem identified.

Action-Oriented Program (AOPs):

The action-oriented programs designed to address the underutilization of women and minorities, the utilization goal set for individuals with disabilities, and the hiring benchmark for the protected veterans are listed below. These action-oriented programs will be carried-out throughout the AAP year. Evaluation of these AOPS will be conducted at least annually. The Human Resources Director, with the help of the managers, will be responsible in ensuring that the following are implemented.

**Recruitment:**

1. NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE will continue to place advertisements on job opportunities through local job service offices. The local job service office will be notified concurrent with the placement of a newspaper ad.
2. Due to the extensive technical education and experience required for some positions, NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE will also continue to place job opportunity announcements in the company website, and in national newspaper when appropriate.
3. Advertisements and newsletters will always carry the Equal Employment Opportunity clause.
4. Minority and female applicants will be considered for all positions for which they are qualified.
5. NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE will participate in job fairs if there are sufficient numbers of opening to warrant participation.
6. The company will continue to employ co-op students who work during the summer and part-time during the school year. Many of these students are referred by the TMCC Career Center.
7. NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE will continue to electronically publish recruiting information where minority and female members of the workforce are included, as well as in other company literature.

**Job Specifications/Selection Process:**

1. Develop position descriptions that accurately reflect position functions, and are consistent for the same position from one location to another.
2. Develop job or worker specifications that contain academic, experience, and skill requirements that do not constitute inadvertent discrimination. Develop specifications that are free from bias

with regard to age, race, color, gender, religion, national origin, disability or veteran status.

3. Approved position specifications and worker specifications will be made available to all members of management involved in the recruiting, screening, selection, and promotion process. Copies may also be made available to recruiting sources.
4. NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE will continue to use only worker specifications that include job-related criteria.
5. NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE will continue to carefully select and counsel all personnel involved in the recruiting, screening, selection, promotion, disciplinary, and related processes to eliminate bias in all personnel actions.

**Job Advancement:**

1. Minority and female employees can be made available for participation in Career Days, Youth Motivation Programs, and related activities in the community, as desired.
2. NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE will continue to post or announce job opportunities. NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE's Job Posting Policy System requires postings of all positions up to the Senior Management level.
3. NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE will continue to make use of the inventory of our current employee skills, when completed, to determine academic, skill, and experience level of individual employees.
4. Establish, whenever feasible, formal career counseling programs to include attitude Development, education, aid, job rotation, buddy system, or similar programs.
5. Review seniority practices to ensure such practices are non-discriminatory and do not have discriminatory effect.
6. All employees are actively encouraged to participate in facilities and company-sponsored social and recreational activities.
7. Encourage the design of transportation programs to improve employment opportunities for minorities and females.
8. NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE will continue to use our formal employee evaluation program. The performance Appraisal is used for annual reviews for all employees.
9. Employees can choose training courses through Professional Development and include them in their career development plan.
10. Tuition assistance is offered to all eligible employees who are interested in pursuing an undergraduate degree or an advance degree, with certain limitations.

**CHAPTER 4: INTERNAL AUDIT AND REPORTING**  
**41 C.F.R. § 60-2.17(d)**

The NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE's auditing and reporting system periodically measures the effectiveness of its total affirmative action program. The Human Resources Director, in conjunction with the Equity, Inclusion and Sustainability Program Manager to:

1. Monitors records of all personnel activity, including referrals, placements, transfers, promotions, terminations, and compensation, at all levels to ensure the nondiscriminatory policy is carried out;
2. Requires internal reporting on a scheduled basis as to the degree to which equal employment opportunity and organizational objectives are attained;
3. Reviews report results with appropriate levels of management; and
4. Advises top management of program effectiveness and submit recommendations for improvement.

**NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY  
COLLEGE**

**PART II: AFFIRMATIVE ACTION PLAN FOR PROTECTED VETERANS AND  
INDIVIDUALS WITH DISABILITIES**

**FOR**

**January 1, 2023 - December 31, 2023**

## PART II

### AAP FOR PROTECTED VETERANS AND INDIVIDUALS WITH DISABILITIES

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**CHAPTER A: POLICY STATEMENT**  
**41 C.F.R. §§ 60-300.44(a); 60-741.44(a)**

It is the policy of NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE and my personal commitment that equal employment opportunity be provided in the employment and advancement for all persons regardless of race, religion, color, national origin, sex, age, sexual orientation/gender identity and status as a protected veteran or individual with a disability at all levels of employment, including the executive level. NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE does not and will not discriminate against any applicant or employee regardless of race, religion, color, national origin, sex, age, sexual orientation/gender identity and status as a protected veteran and/or individual with a disability to any position for which the applicant or employee is qualified. In addition, NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE is committed to a policy of taking affirmative action to employ and advance in employment qualified protected veteran employees and qualified employees with disabilities at all levels, including the executive level. Such affirmative action shall apply to all employment practices, including, but not limited to hiring, upgrading, demotion or transfer, recruitment, recruitment advertising, layoff or termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship and on-the-job training. Decisions related to personnel policies and practices shall be made based on an individual's capacity to perform a particular job and the feasibility of any necessary job accommodation. NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE will make every effort to provide reasonable accommodations to any physical and mental limitations of individuals with disabilities and to disabled veterans.

1. Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in any activity protected by state, federal or local anti-discrimination laws including the following activities:
2. Filing a complaint;
3. Assisting or participating in an investigation, compliance evaluation, hearing, or any other activity related to the administration of the affirmative action provisions of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended (VEVRAA) or any other Federal, state or local law requiring equal opportunity for disabled veterans, recently separated veterans, active wartime or campaign badge veterans, or Armed Forces service medal veterans or Section 503 of the Rehabilitation Act of 1973, as amended (Section 503) or any other federal, state or local law requiring equal opportunity for disabled persons;
4. Opposing any act or practice made unlawful by VEVRAA or its implementing regulations or any other federal, state, or local law requiring equal opportunity for disabled veterans, recently separated veterans, active wartime or campaign badge veterans, or Armed Forces service medal veterans or section 503 or its implementing regulations or any other federal, state, or local law requiring equal opportunity for disabled persons; or
5. Exercising any other right protected by VEVRAA or Section 503 or their implementing regulations.

Our obligations in this area stem from not only adherence to various state and federal regulations, but also from our commitment as an employer in this community to provide job opportunities to all persons

regardless of race, religion, color, national origin, sex, age, sexual orientation, gender identity and status as a protected veteran or an individual with disability. NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE's EEO policy and affirmative action obligations include the full support from the TMCC President, Dr. Karin Hilgersom.

TMCC President has been delegated as the person in charge of overseeing the annual preparation and implementation of the Affirmative Action Program. NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE will also continually design and implement audit and reporting systems that will measure the effectiveness and the compliance of the AAP, identify the need for remedial actions, determine if objectives were attained, and determine if opportunities to participate in company-sponsored activities were extended to all employees and applicants.

The NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE is also committed to abiding with the Pay Transparency Nondiscrimination Provisions and therefore, will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. The NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE's employees who have access to the compensation information of other employees or applicants as part of their essential job functions are informed and trained to not disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) a response to a formal complaint or charge; (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE's legal duty to furnish the information.

It is also NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE's policy not to discriminate because of a person's relationship or association with a protected veteran. This includes spouses and other family members. Also, NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE will safeguard the fair and equitable treatment of protected veteran spouses and family members regarding all employment actions and prohibit harassment of applicants and employees because of their relationship or association with a protected veteran.

If you have any questions regarding our equal employment opportunity, harassment policies or the complaint procedure, you may contact your local Human Resources representative. Parts of the Affirmative Action Plan may be reviewed, as appropriate, by making an appointment with a local Human Resources representative.

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(Signature)

Dr. Karin Hilgersom  
TMCC President

1/1/2023



**CHAPTER B: REVIEW OF PERSONNEL PROCESSES**  
**41 C.F.R. §§ 60-300.44(b); 60-741.44(b)**

To ensure that all personnel activities are conducted in a job-related manner which provides and promotes equal employment opportunity for all known protected veterans and employees and applicants with disabilities, reviews are periodically made of the Company's examination and selection methods to identify barriers to employment, training, and promotion.

1. NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE periodically conduct a review of its employment processes to ensure thorough and systematic consideration of the job qualifications of 1) known protected veteran applicants and employees; and 2) applicants and employees with disabilities for job vacancies filled either by external hiring or internal promotions/transfers, as well as for all training opportunities available. To determine whether an individual is qualified for a particular job, a close examination of the content of the job is made, as well as a review of the job qualifications of known protected veterans and individuals with disabilities, both applicants and employees. In determining the qualifications of a protected veteran, consideration is given only to that portion of the military record, including discharge papers, relevant to the job qualifications for which the veteran is being considered.
2. The company ensures that its personnel processes do not stereotype individuals with disabilities or protected veterans in a manner which limits their access to jobs for which they are qualified.
3. The company ensures that applicants and employees with disabilities have equal access to its personnel processes, including those implemented through information and communication technologies.
4. The company provides reasonable accommodations, unless such accommodations will cause undue hardship to the company, to applicants and employees with disabilities to ensure that equal employment opportunity are extended in the operation of its personnel processes.
5. The company ensures that information and communications systems are accessible to all employees and applicants with disabilities even in the absence of a specific request for accommodation.

**CHAPTER C: PHYSICAL AND MENTAL QUALIFICATIONS**  
**41 C.F.R. §§ 60-300.44(c); 60-741.44(c)**

To ensure that all physical and mental qualifications and requirements are job-related and promote equal employment opportunity for all known protected veterans and employees and applicants with qualified disabilities, reviews are periodically made of the Company's physical and mental qualifications and requirements as they relate to employment, training, and promotion.

The Company's physical and mental job requirements are reviewed to determine whether they are job-related and consistent with business necessity and safe performance on the job.

Schedule for Review: Any previously reviewed classification will be reviewed again if there is a change in working conditions which affects the job's physical or mental requirements (e.g., new requirements, new equipment, etc.)

**CHAPTER D: REASONABLE ACCOMMODATION TO PHYSICAL AND MENTAL  
LIMITATIONS**

**41 C.F.R §§ 60-300.44(d); 60-741.44(d)**

NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE will make every effort to provide reasonable accommodations to physical and mental limitations of applicants and employees with disabilities or who are disabled veterans unless it can demonstrate that the accommodations would impose an undue hardship on the operation of business. Such reasonable accommodations are implemented in the company's electronic and/or online application systems. The company ensures that qualified applicants and employees with disabilities, who are unable to fully utilize the system, are provided equal opportunities to apply and be considered for all jobs. NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE will confidentially review performance issues of employees with known disabilities to determine whether a reasonable accommodation is needed when: (a) the employee is having significant difficulty with job performance, and (b) it is reasonable to conclude that the problem is related to the known disability.

Employees may notify their direct supervisor or contact the HR department at any time to formally request an accommodation.

**CHAPTER E: HARASSMENT**  
**41 C.F.R. §§ 60-300.44(e); 60-741.44(e)**

NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE has developed and implemented a set of procedures to ensure that its employees with disabilities and protected veterans are not harassed due to protected characteristics. A copy of the sexual harassment policy, which includes a section prohibiting harassment of individuals with disabilities and/or protected veterans are available for distribution to new as well as to existing employees.

**CHAPTER F: EXTERNAL DISSEMINATION OF POLICY, OUTREACH AND POSITIVE  
RECRUITMENT**

**41 C.F.R. §§ 60-300.44(f); 60-741.44(f)**

Based upon NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE 's review of its personnel policies as described in Chapter B, the following activities will be implemented or continued to further enhance our affirmative action efforts. All activities are the responsibility of the Human Resources Director, Equity, Inclusion and Sustainability Program Manager and Marketing and Communication Department.

1. Undertake appropriate outreach and positive recruitment activities that are reasonably designed to effectively recruit protected veterans and individuals with disabilities.
2. Send written notification of the Company's affirmative action policy to all subcontractors, vendors, and suppliers requesting appropriate action on their part.
3. Annually review the outreach and recruitment efforts taken over the previous twelve months to evaluate their effectiveness in identifying and recruiting qualified protected veterans and individuals with disabilities. Identify and implement alternative efforts, if previous efforts are not effective.
4. Ensure that activities undertaken to comply with the obligations of this section are documented and such documents are retained for a period of three (3) years.

## **CHAPTER G: INTERNAL DISSEMINATION OF POLICY**

### **41 C.F.R. §§ 60-300.44(g); 60-741.44(g)**

To gain positive support and understanding for the affirmative action program for protected veterans and individuals with disabilities NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE will implement or continue to implement the following internal dissemination procedures, all of which are the responsibility of the Human Resources Director. The following policies and procedures are designed to foster support and understanding from NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE 's executive staff, management, supervisors, and other employees to encourage all employees to take the necessary actions to aid NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE in meeting its obligations.

1. Include the policy in the NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE 's policy manual and other in-house publications.
2. Schedule training sessions for all employees involved in recruiting, selection, promotion, and other related employment issues for protected veterans and individuals with disabilities.
3. Discuss the policy thoroughly in both employee orientation and management training programs.
4. If applicable, inform union officials of the contractor's policy, and request their cooperation.
5. Post the policy on Company bulletin boards, along with the Company's harassment policy which includes protection from harassment on the basis of disability.

**CHAPTER H: AUDIT AND REPORTING SYSTEM**  
**41 C.F.R. §§ 60-300.44(h); 60-741.44(h)**

NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE has developed and currently implements an audit and reporting system that addresses the following:

1. Measures the effectiveness of NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE 's overall affirmative action program and whether the company is in compliance with specific obligations.
2. Indicates the need for remedial action. Any corrective actions will be the responsibility of the Human Resources Director with input from the Equity, Inclusion and Sustainability Program Manager.
3. Measures the degree to which NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE 's objectives are being met.
4. Whether there are any undue hurdles for individuals with disabilities and protected veterans regarding company sponsored educational, training, recreational, and social activities. This will also include, but not limited, to the review of the on-line and electronic application system to determine their accessibility and ensuring that procedures to request for accommodations are prominently displayed and that individuals with disabilities can readily obtain the needed accommodation.
5. Ensures that outreach activities are documented and that such documents are kept for at least a period of three (3) years.

**CHAPTER I: RESPONSIBILITY FOR IMPLEMENTATION**  
**41 C.F.R. §§ 60-300.44(i); 60-741.44(i)**

As part of its efforts to ensure equal employment opportunity to protected veterans and individuals with disabilities, NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE has designated TMCC President with overall responsibility of preparing and implementing the organization's annual affirmative action programs in accordance with the OFCCP's regulations.

TMCC President

The TMCC President is responsible for providing top management support for the Company's AAP. This person issues a memo annually to reaffirm the Company's Equal Employment Opportunity Policy and to make known to all employees and applicants the commitment of Senior Management to EEO and affirmative action. Additional responsibilities include, but are not limited to:

- 1) Designating appropriate personnel with the responsibility for overseeing, administering, implementing, and monitoring the Company's AAP. Ensuring that these personnel are identified in writing by name and job title.
- 2) Ensuring that designated personnel responsible for all AAP components are given the necessary authority and top management support and staffing to successfully implement their assigned responsibilities.
- 3) Imparting the personal direction that ensures total involvement and commitment to equal employment opportunity programs through NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE's AAP.

Human Resources Director

The Human Resources Director is responsible for overall supervision of the AAP. The Human Resources Director ensures, through the department managers and supervisors, that all relevant policies and procedures are adhered to. Successful implementation of this program is a basis for evaluating the Human Resources Director's effective work performance. The Human Resources Director's responsibilities include, but are not limited to, the following:

- 1) Presenting all needed recommendations and procedural changes to Senior Management concerning EEO and affirmative action and ensuring that Senior Management is kept informed of the Company's compliance status.
- 2) Maintaining Company-wide management support and cooperation for the Company's AAP.
- 3) Collaborating with Senior Management on EEO and AAP issues.
- 4) Assisting line management in arriving at solutions to EEO/AA problems.
- 5) Reviewing results of audit and reporting systems to assess the effectiveness of the Company's AA programs and to direct corrective actions where necessary.



- 6) Ensuring that the AAP is updated annually for all establishments.
- 7) Providing guidance to managers and supervisors in taking proper action to prevent employees from being harassed in any way, through one-on-one contact, training, and disciplinary action.
- 8) Providing guidance and direction to the managers, and supervisors.
- 9) Reviewing the qualifications of all employees to ensure equitable opportunity, based on job-related employment practices, is given to all for transfers and promotions.
- 10) Conducting periodic audits of: 1) training programs and hiring and promotion patterns to remove impediments to the attainment of AAP goals and objectives, and 2) the Company's sponsored educational, training, recreational, and social activities to ensure that all employees are encouraged to participate in accordance with policies on non-discrimination. Determine whether known protected veterans and employees with disabilities have had the opportunity to participate in all Company-sponsored educational, training, recreation and social activities.
- 11) Reviewing all job descriptions and specifications to ensure they are free of discriminatory provisions and artificial barriers. Ensuring that all requirements are job-related, that they are realistic, and that they reflect the actual work requirements of the essential job duties.
- 12) Ensuring the Company's VETS 4212 form is filed annually with the Veterans' Employment and Training Service (VETS) if applicable.
- 13) Providing direction to the Company's employees, as necessary, to carry out all actions required to meet the Company's equal employment opportunity and affirmative action commitments.
- 14) Responsible for the design and effective implementation of the AAP at all establishments.
- 15) Developing, implementing, and maintaining audit and reporting systems to measure effectiveness of equal employment opportunity programs, including those that will
  - a) Indicate need for remedial action,
  - b) Determine degree to which goals and objectives have been obtained.
- 16) Advising management in the modification and development of the Company's policies to ensure the enhancement of equal employment opportunity for all employees and potential employees within existing equal employment opportunity guidelines.
- 17) Identifying problem areas and establishing procedures, goals and objectives to solve these problems.
- 18) Providing guidelines in the development, preparation, and implementation of career counseling programs for known protected veterans and employees with disabilities.
- 19) NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY

COLLEGE conducts periodic audits to ensure that all required posters and the equal employment opportunity policies and AAP are displayed properly. NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE also conducts audits to ensure that the Invitation to Self-Identify (pre and post offer) for protected veterans and individuals with disabilities, the Company's equal employment opportunity, and AAP policies are being utilized appropriately and thoroughly communicated.

- 20) Developing policy statements, affirmative action programs, internal and external communication techniques.
- 21) Assisting line management in arriving at solutions to problems.
- 22) Serving as the liaison between NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE and enforcement agencies.
- 23) Serving as the liaison between NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE and organizations and community action groups for protected veterans and individuals with disabilities, in addition to ensuring that representatives are involved in community service programs of local organizations for protected veterans and individuals with disabilities.
- 24) Keeping management informed of the latest developments in the equal employment opportunity area.
- 25) Reviewing, reporting on, and updating the AAP annually in accordance with stated policy. Informing employees and applicants of significant changes.
- 26) Working closely with the department managers and supervisors in coordinating the effective implementation of all identified affirmative actions.
- 27) Assisting in review and revision of all policies, procedures, and rules to ensure they are not in violation of federal or state laws and regulations.
- 28) Responsible for ensuring overall the Company's compliance with the AAP.

#### Managers and Supervisors

In their direct day-to-day contact with the Company's employees, managers and supervisors have assumed certain responsibilities to help NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE ensure compliance with equal employment opportunity programs and effective implementation of the AAP. These include, but are not limited to the following:

1. Aggressively adhering to the Company's equal employment opportunity policy.
2. Supporting and assisting the Human Resources Director in developing, maintaining, and successfully implementing the AAP.
3. Completing progress reports regarding the status of affirmative action programs.

4. Taking action to prevent harassment of employees placed through affirmative action efforts.
5. Assigning employees to significant jobs that might lead to greater personal growth and value, and counsel them with respect to what is needed for upward mobility within the employment structure.
6. Ensuring that all interviews, offers of employment and/or wage commitments are consistent with the Company's policy.
7. Implementing the internal promotion and transfer of all employees under their supervision consistent with AAP goals and objectives.
8. Assisting in identifying problem areas and providing needed information for establishing and meeting department affirmative action goals and objectives.
9. Seeking and sharing information on feasible accommodations which have been or could be made for known disabilities.

**Chapter J: Training**  
**41 C.F.R. §§ 60-300.44(j); 60-741.44(j)**

NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE trains all employees involved with the recruitment, selection, promotion, disciplinary actions, training, and related processes of individuals with disabilities or protected veterans to ensure commitment to the company's stated affirmative action goals.

**CHAPTER K: DATA COLLECTION ANALYSIS**  
**41 C.F.R. §§ 60-300.44(k); 60-741.44(k)**

NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE has adopted the current national percentage of veterans in the civilian labor force of 5.5% as its hiring benchmark for protected veterans. NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE will update its hiring benchmark as new data is published and updated via the OFCCP's website. The 5.5% hiring benchmark is applied to each job group within NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE.

NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE also adopted the current national utilization goal of 7.0% for qualified individuals with disabilities. NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE will update its utilization goal as new data becomes available, updated and published. The 7.0% utilization goal is applied *to each job group* within NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE.

NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE has collected the required data and conducted studies to identify areas of opportunities in the employment of protected veterans and individuals with disabilities. NEVADA SYSTEM OF HIGHER EDUCATION - TRUCKEE MEADOWS COMMUNITY COLLEGE will continue to monitor and update these studies periodically during each AAP year. In each case where the hiring benchmark for protected veterans and/or the utilization goal for individuals with disabilities are not met, affirmative actions, as appropriate, will be taken consistent with the activities mentioned in Chapter F (External Dissemination of Policy and Outreach and Positive Recruitment) and measures described in Chapter H (Internal Audit and Reporting) of this AAP.