



## **Affirmative Action Plan 2017 – 2022**

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## **A. POLICY AND REVIEW**

Consistent with WAC 392-190-0592 and chapters 28A.640 and 28A.642 RCW, it is the purpose of this Affirmative Action Plan to advance, monitor, and maintain Lake Washington School District's Equal Employment Opportunity Policy providing equal employment opportunities for all employees and applicants in all aspects of employment, including recruitment, hiring, retention, assignment, transfer, promotion, and training. These opportunities will be provided without regard to race, creed, religion, color, national origin, honorably discharged veteran or military status, sexual orientation including gender expression or identity, the presence of any sensory, mental, or physical disability, or the use of a trained guide dog or service animal by a person with a disability.

It is also the purpose of the District's Affirmative Action Plan to promote diversity in the District's work force by identifying and addressing, where reasonably possible, the factors that may be contributing to unexpected underutilization of protected groups. This Plan is designed to promote outreach, recruitment, training, and educational efforts to expand the pool of qualified applicants, and to promote diversity, consistent with the District's standards of excellence.

The Lake Washington School District regularly reviews its policies and procedures to ensure that they reflect current local, state, and federal statutes and regulations. The District's policies for Equal Employment Opportunity, Employment of Persons with Disabilities, and Nondiscrimination are included in Appendix A.

## **B. WORKFORCE ANALYSIS BY RACE/ETHNICITY AND SEX**

This section of the Plan provides a numerical analysis of the District's workforce demographics. The term "underutilization" as used in this Plan means having fewer members of a protected group in a particular job category than reasonably would be expected based upon that group's availability. The statistical comparisons in this section incorporate workforce statistics for geographic areas relevant to the District, derived from the 2010 U.S. census reports and materials made available through the Office of Superintendent of Public Instruction for the State of Washington, available at the following web address:

<http://www.k12.wa.us/Equity/Districts/AffirmativeAction.aspx>

The selection of such geographic areas and statistics have been selected and used in good faith and for the purpose of implementing this Affirmative Action Plan and facilitating identification of areas of potential underutilization. These statistical comparisons do not have any independent legal or factual significance.

The census reports noted above were used to generate "theoretical availability" ("TA") figures, which indicate the percentage of workers in a given job category, or across all jobs, living in King or Snohomish Counties and identifying themselves as belonging to a particular protected class. The TA figure is a useful tool for approximating whether the District underutilizes any protected class, but it should be noted that true availability figures may be higher or lower than the TA.

After a TA was determined for protected groups in each job category, a straight comparison of actual utilization against the TA figure was conducted. In addition, each TA figure was reduced by 20% to arrive at a statistically expected utilization (“SEU”), and a comparison of actual utilization against the SEU was made as well. The SEU comparison is made 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, as pure chance may account for utilization that is 20% less than the theoretical availability. Deviations from both figures, however, are considered in the identification of problem areas and possible underutilization. As used in this Plan, “deviation” from the TA or SEU refers to the value obtained by subtracting the actual utilization percentage from the TA or SEU percentage.

With respect to race/ethnicity and gender, a specific analysis was completed for each of the following job categories: certificated administrators; elementary teachers; secondary teachers; certificated support personnel; classified administrative and paraprofessional; office personnel; custodians; maintenance/crafts; instructional assistants; special education para educators; and transportation personnel.

## Utilization Analysis by Race/Ethnicity

Employment Category <sup>1</sup>	Total Employees	Total Minority	% Total Minority	% Black or African American	% Asian or Pacific Islander	% Hispanic or Latino	% American Indian or Alaska Native	Theoretical Availability (%) <sup>2</sup>	Statistically Expected Utilization (%) <sup>3</sup>	Deviation from TA (%) <sup>4</sup>	Deviation from SEU (%) <sup>5</sup>
<i>Certificated</i>											
Administrators	104	7	6.7%	1.9%	3.8%	0%	0.9%	17.5%	14%	10.5%	7.3%
Elementary Teachers	748	68	9.1%	0.7%	4.9%	2.5%	0.7%	9.9%	7.9%	0.8%	(1.2)%
Secondary Teachers	560	46	8.2%	1.4%	3.2%	2.1%	0.5%	15.1%	12.1%	6.9%	3.9%
Support Personnel	617	65	10.5%	2.1%	4.7%	1.6%	0.9%	20.1%	16.1%	9.6%	5.6%
Total Certificated	2029	186	9.2%	1.5%	4.2%	1.6%	0.8%	N/A	N/A	7%	3.9%
<i>Classified</i>											
Administrative/Paraprofessionals	206	32	15.5%	1.9%	7.8%	2.9%	0.5%	17.5%	14%	2%	(1.5)%
Office Personnel	310	25	8.1%	0.6%	4.5%	1.6%	0.3%	30.2%	24.2%	22.1%	16.1%
Custodians	115	56	48.7%	2.6%	28.7%	16.5%	0.9%	45.6%	36.5%	(3.1)%	(12.2)%
Maintenance/Crafts	37	5	13.5%	5.4%	0%	5.4%	2.7%	25.8%	20.6%	12.3%	7.1%
Instructional Assistants	551	98	17.8%	1.6%	10.5%	3.4%	0.7%	17.3%	13.8%	(0.5)%	(4)%
Special Ed. Paraeducators	448	74	16.5%	2%	8.7%	5.1%	0.2%	15.7%	12.6%	(0.8)%	(3.9)%
Transportation	232	38	16.4%	0%	7.3%	7.3%	1.7%	21.2%	16.9%	4.8%	0.5%
Total Classified	1899	328	17.3%	2%	9.6%	6%	1%	N/A	N/A	5.3%	0.3%
District Grand Total	3928	514	13.3%	1.8%	6.9%	3.8%	0.9%	N/A	N/A	6.2%	2.1%

<sup>1</sup> The occupational titles under which Census data is tracked only loosely match the job categories tracked by school districts. The availability analysis in this table is based off Census data for the following occupational titles: Certificated Administrators – “Education Administrators”; Elementary Teachers – “Elementary and Middle School Teachers”; Secondary Teachers – “Secondary School Teachers”; Certificated Supported Personnel – “Other Education, Training, and Library Workers”; Classified Administrative/Paraprofessionals – “Education Administrators”; Office Personnel – “Office and Administrative Support Workers, All Other”; Custodians – “Janitors and Building Cleaners”; Maintenance/Crafts – “Maintenance and Repair Workers, General”; Instructional Assistants – “Teacher Assistants”; Special Education Para Educators – “Special Education Teachers”; and Transportation – “Bus Drivers.”

<sup>2</sup> Total percentage of labor force identified as non-white for combined King and Snohomish Counties, as reported in 2010 Census data and located at the U.S. Census American FactFinder website, available at <https://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>.

<sup>3</sup> Calculated by reducing the theoretical availability by 20%.

<sup>4</sup> Calculated by subtracting the actual utilization from the theoretical availability.

<sup>5</sup> Calculated by subtracting the actual utilization from the statistically expected utilization.

## Utilization Analysis by Sex

Employment Category	Total Employees	Total Female	% Total Female	Theoretical Availability (%) <sup>6</sup>	Statistically Expected Utilization (%)	Deviation from TA (%)	Deviation from SEU (%)
<i>Certificated</i>							
Administrators	104	55	52.9%	67.9%	54.3%	15%	1.4%
Elementary Teachers	748	681	91%	74.9%	59.9%	(16.1)%	(31.1)%
Secondary Teachers	560	372	66.4%	55.6%	44.5%	(10.8)%	(21.9)%
Support Personnel	617	508	82.3%	79%	63.2%	(3.3)%	(16.4)%
Total Certificated	2029	1616	79.6%	N/A	N/A	(3.8)%	(17.3)%
<i>Classified</i>							
Administrative/ Paraprofessionals	206	132	64.1%	62.8%	50.2%	(1.3)%	(13.9)%
Office Personnel	310	310	100%	71%	56.8%	(29)%	(43.2)%
Custodians	115	21	18.3%	29.8%	23.8%	11.5%	5.5%
Maintenance/ Crafts	37	4	10.8%	7.8%	6.2%	(3)%	(4.6)%
Instructional Assistants	551	527	95.6%	91.3%	73%	(4.3)%	(22.6)%
Special Ed. Paraeducators	448	419	93.5%	92.4%	73.9%	(1.1)%	(19.6)%
Transportation	232	111	47.8%	38.2%	30.6%	(9.6)%	(17.2)%
Total Classified	1899	1524	80.3%	N/A	N/A	(5.3)%	(16.5)%
District Grand Total	3928	3140	79.9%	N/A	N/A	(4.6)%	(16.9)%

<sup>6</sup> Total percentage of labor force identified as female for combined King and Snohomish Counties, as reported in 2010 Census data and located at the U.S. Census American FactFinder website, available at <https://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>.

## Utilization Analyses by Employment Category

Certificated Administrators. This job category includes principals, assistant principals, superintendent, assistant superintendents, human resources director, special education and career and technical education director, and directors of elementary and secondary education.

Year	Total Employees	Total Ethnic Minority	% Ethnic Minority	TA (%)	Deviation from TA (%)	SEU (%)	Deviation from SEU (%)
2016	104	7	6.7%	17.5%	10.8%	14%	7.3%
2011	76	7	9.2%	16.2%	7%	13%	3.8%
2006	74	8	10.8%	16.2%	5.4%	13%	2.2%

Year	Total Employees	Total Female	% Female	TA (%)	Deviation from TA (%)	SEU (%)	Deviation from SEU (%)
2016	104	55	52.9%	67.9%	15%	54.3%	1.4%
2011	76	40	52.6%	62.9%	10.3%	50.3%	(2.3)%
2006	74	36	48.6%	62.9%	14.3%	50.3%	1.7%

Analysis: The total number of employees in this category increased between 2011 and 2016. However, the number of ethnic minority administrators did not change. Further, the theoretical availability of minority administrators increased slightly. Consequently, the District's deviation from the SEU increased by 3.5%.

With respect to sex, while there are currently more female administrators than in 2011, the increase in total certificated administrators and an increase in theoretical availability resulted in the District deviating from the SEU by 0.4%, a difference of 1.9% from 2011.

While the total number of female certificated administrators has increased, the total number of ethnic minorities has remained consistent with 2011 numbers despite the increase in total employees in this category. Because the theoretical availability and has also risen in the District's geographic area since 2011, both females and ethnic minorities appear to be currently underutilized. The District will ensure that recruitment efforts continue to reach ethnic minorities and females as well as other protected and non-protected groups in this category with a goal of decreasing the District's deviation from the SEU over the next five years.

Certificated Elementary Teachers. This job category includes all teachers of preschool through sixth grade, including special education teachers.

Year	Total Employees	Total Ethnic Minority	% Ethnic Minority	TA (%)	Deviation from TA (%)	SEU (%)	Deviation from SEU (%)
2016	748	68	9.1%	9.9%	0.8%	7.9	(1.2)%
2011	714	59	9.2%	10.2%	1%	8.2%	(1)%
2006	798	61	7.6%	10.2%	2.6%	8.2%	0.6%

Year	Total Employees	Total Female	% Female	TA (%)	Deviation from TA (%)	SEU (%)	Deviation from SEU (%)
2016	748	681	91%	74.9%	(16.1)%	59.9%	(31.1)%
2011	714	640	89.6%	77.7%	(11.9)%	62.6%	(27)%
2006	798	711	89.1%	77.7%	(11.4)%	62.2%	(26.9)%

Analysis: The total number of employees, ethnic minorities, and females in this category increased from 2011 to 2016. The District's current utilization of ethnic minorities and female certificated elementary teachers in Lake Washington's geographic area exceeds the statistically expected utilization. As such, there is currently no apparent underutilization of ethnic minorities or females in this group.

Certificated Secondary Teachers. This job category includes all teachers of grades seven through twelve, including special education teachers.

Year	Total Employees	Total Ethnic Minority	% Ethnic Minority	TA (%)	Deviation from TA (%)	SEU (%)	Deviation from SEU (%)
2016	560	46	8.2%	15.1%	6.9%	12.1%	3.9%
2011	389	33	8.5%	11.7%	3.2%	9.3%	0.8%
2006	574	42	7.3%	11.7%	4.4%	9.3%	2%

Year	Total Employees	Total Female	% Female	TA (%)	Deviation from TA (%)	SEU (%)	Deviation from SEU (%)
2016	560	372	66.4	55.6%	(10.8)%	44.5%	(21.9)%
2011	389	230	59.1%	57.2%	(1.9)%	45.7%	(13.4)%
2006	574	339	59.1%	57.2%	(1.9)%	45.7%	(13.4)%

Analysis: The total number of certificated secondary teachers has increased substantially since 2011, marking a return to numbers close to those of 2006. However, while the theoretical availability of ethnic minorities was consistent between 2006 and 2011, it has risen by 3.4% since 2011. Thus, while the District currently employs a greater number of ethnic minority secondary teachers than five years ago, the District’s deviation from the SEU has increased by 3.1%. This trend suggests that the District currently underutilizes ethnic minorities in this category. The District will continue to ensure that recruitment of ethnic minority secondary teachers reaches minorities with a goal of decreasing its current deviation from the SEU over the next five years.

With respect to sex, the theoretical availability of female secondary teachers has decreased from 2011. This factor in combination with a significant increase in total female secondary teachers has resulted in a more significant deviation from the SEU than in past years. This suggests that the District does not underutilize females in this category.



Certificated Support Personnel. This job category includes positions such as librarians, counselors, speech and language pathologists, occupational therapists, school psychologists, and staff developmental specialists. Each person in this job category is certificated.

Year	Total Employees	Total Ethnic Minority	% Ethnic Minority	TA (%)	Deviation from TA (%)	SEU (%)	Deviation from SEU (%)
2016	617	65	10.5%	20.1%	9.6%	16.1%	5.6%
2011	520	41	7.8%	12.4%	4.6%	9.9%	1.1%
2006	203	15	7.4%	12.4%	5%	9.9%	2.5%

Year	Total Employees	Total Female	% Female	TA	Deviation from TA	SEU	Deviation from SEU
2016	617	508	82.3%	79%	(3.3)%	63.2%	(16.4)%
2011	520	427	82.1%	68.4%	(13.7)%	54.7%	(27.4)%
2006	203	177	87.2%	68.4%	(18.8)%	54.7%	(32.5)%

Analysis: The total number of employees in this category increased from 2011 to 2016 as did the theoretical availability of ethnic minorities and females. While the District currently has a greater number of ethnic minority and female certificated support personnel than it did in 2011, the District's deviation from the SEU with respect to minorities, specifically, indicates that minorities are being underutilized in this category. Over the next five years, the District will continue to ensure that recruitment efforts reach ethnic minorities as well as other protected and non-protected group members in this job category with a goal of decreasing its current deviation from the SEU over the next five years.

With respect to sex, while the District's overall utilization of female certificated support personnel has decreased by 11%, the District's -16.4% deviation from the current SEU indicates that females are not underutilized in this category.

Classified Administrators/Paraprofessionals. This job category includes non-certificated managers: purchasing, human resources, accounting, facilities, payroll, computer department, health services, and nurses.

Year	Total Employees	Total Ethnic Minority	% Ethnic Minority	TA (%)	Deviation from TA (%)	SEU (%)	Deviation from SEU (%)
2016	206	32	15.5%	17.5%	2%	14%	(1.5)%
2011	115	11	9.5%	16.2%	6.7%	13%	3.5%
2006	139	12	8.6%	16.2%	7.6%	13%	4.4%

Year	Total Employees	Total Female	% Female	TA (%)	Deviation from TA (%)	SEU (%)	Deviation from SEU (%)
2016	206	132	64.1%	62.8%	(1.3)%	50.2%	(13.9)%
2011	115	79	68.7%	62.9%	(5.8)%	50.3%	(18.4)%
2006	139	103	74.1%	62.9%	(11.2)%	50.3%	(23.8)%

Analysis: The total number of employees in this job category increased between 2011 and 2016. The number of ethnic minority classified administrators/paraprofessionals has increased as well, which has resulted in the District's deviation from the SEU decreasing

from 3.5% in 2011 to 1.5% in 2016. This indicates that ethnic minorities are no longer underutilized in this category.

The number of female classified administrators/paraprofessionals also increased while the District’s deviation from the SEU in this regard decreased. Despite this decrease, the female deviation from the SEU is -13.9%, which indicates that females are not currently underutilized in this category.

Office Personnel. This job category includes all secretaries, both at the schools and at the central administration offices.

Year	Total Employees	Total Ethnic Minority	% Ethnic Minority	TA (%)	Deviation from TA (%)	SEU (%)	Deviation from SEU (%)
2016	310	25	8.1%	30.2%	22.1%	24.2%	16.1%
2011	178	13	7.3%	18.7%	11.4%	14.9%	7.6%
2006	181	18	9.9%	18.7%	8.8%	14.9%	5%

Year	Total Employees	Total Female	% Female	TA (%)	Deviation from TA (%)	SEU (%)	Deviation from SEU (%)
2016	310	310	100%	71%	(29)%	56.8%	(43.2)%
2011	178	177	99.4%	72.4%	(27)%	57.9%	(41.5)%
2006	181	181	100%	72.4%	(27.6)%	57.9%	(42.1)%

Analysis: The total number of employees in this category increased by 132 between 2011 and 2016. The theoretical availability of ethnic minority office personnel also significantly increased from 18.7% in 2011 to 30.2% in 2016. While the number of ethnic minority office personnel also increased during this time, the District’s deviation from the SEU with respect to minorities is 16.1%, which suggests a statistical underutilization of minorities in this job group. Over the next five years, the District will continue to ensure that recruitment efforts reach ethnic minorities as well as other protected and non-protected groups in this category with a goal of decreasing its current deviation from the SEU.

The number of female employees increased between 2011 and 2016, while the theoretical availability of female officer personnel decreased slightly. The District’s current deviation from the SEU is -43.2%, which indicates that the District does not currently underutilize females in this job category.

Custodians. This job category includes all custodians.

Year	Total Employees	Total Ethnic Minority	% Ethnic Minority	TA (%)	Deviation from TA (%)	SEU (%)	Deviation from SEU (%)
2016	115	56	48.7%	45.6%	(3.1)%	36.5%	(12.2)%
2011	98	37	37.8%	36.6%	(1.2)%	29.3%	(8.5)%
2006	102	30	29.4%	36.6%	7.2%	29.3%	(0.1)%

Year	Total Employees	Total Female	% Female	TA (%)	Deviation from TA (%)	SEU (%)	Deviation from SEU (%)
2016	115	21	18.3%	29.8%	11.5%	23.8%	5.5%
2011	98	15	15.3%	30.4%	15.1%	24.3%	9%
2006	102	14	13.7%	30.4%	16.7%	24.3%	10.6%

Analysis: The total number of custodians has increased since 2011. The District's number of ethnic minority custodians has kept pace with the increasing theoretical availability in this category, indicating that the District's deviation from the SEU with respect to minority custodians is -12.2, suggesting that no underutilization exists.

Although the number of female employees in this category has increased since 2011, and despite the District's deviation from the SEU decreasing by 3.5%, there is still a statistical underutilization of females in this category. Over the next five years, the District will continue to ensure that recruitment efforts reach females and ethnic minorities, as well as other protected and non-protected groups in this job category with a goal of decreasing its current deviation from the SEU.

Maintenance/Crafts. This job category includes all tradespeople, including carpenters, plumbers, painters, and groundskeepers.

Year	Total Employees	Total Ethnic Minority	% Ethnic Minority	TA (%)	Deviation from TA (%)	SEU (%)	Deviation from SEU (%)
2016	37	5	13.5%	25.8%	12.3%	20.6%	7.1%
2011	42	7	16.6%	20%	3.4%	16%	(0.6)%
2006	40	6	15%	20%	5%	16%	1%

Year	Total Employees	Total Female	% Female	TA (%)	Deviation from TA (%)	SEU (%)	Deviation from SEU (%)
2016	37	4	10.8%	7.8%	(3)%	6.2%	(4.6)%
2011	42	4	9.5%	6.9%	(2.6)%	5.5%	(4)%
2006	40	0	0%	6.9%	6.9%	5.5%	5.5%

Analysis: The total number of employees in this job category decreased between 2011 and 2016. The number of ethnic minority maintenance/crafts employees also decreased, which, when combined with an increased theoretical availability of minorities in this category, contributed to an increased deviation from the SEU from -0.6% to 7.1%. The District's current deviation suggests that ethnic minorities are currently underutilized in this job category. The District will continue to ensure that recruitment efforts continue to reach ethnic minorities as well as other protected and non-protected groups in this category.

While the number of female maintenance/crafts employees remained the same between 2011 and 2016, and despite an increase in females' theoretical availability, the District's deviation from the SEU increased from -4% to -4.6%, indicating that the District has continued to not underutilize female employees in this category.

Instructional Assistants. This job category includes playground supervisors, crossing guards, lunchroom monitors, classroom assistants, technology support specialists, and technicians.

Year	Total Employees	Total Ethnic Minority	% Ethnic Minority	TA (%)	Deviation from TA (%)	SEU (%)	Deviation from SEU (%)
2016	551	98	17.8%	17.3%	(0.5)%	13.8%	(4)%
2011	302	31	10.3%	13.2%	2.9%	10.6%	0.3%
2006	306	23	7.5%	13.2%	5.7%	10.6%	3.1%

Year	Total Employees	Total Female	% Female	TA (%)	Deviation from TA (%)	SEU (%)	Deviation from SEU (%)
2016	551	527	95.6%	91.3%	(4.3)%	73%	(22.6)%
2011	302	282	93.4%	90.2%	(3.4)%	72.2%	(21.2)%
2006	306	291	95.1%	90.2%	(4.8)%	72.2%	(22.9)%

Analysis: The total number of instructional assistants increased substantially between 2011 and 2016, including increases in both the number of ethnic minority and female employees in this category. Regarding ethnic minorities, the District's current deviation from the SEU is -4%, representing a change of -3.7%, and indicating that minorities are no longer underutilized in this category.

The number of female instructional assistants increased as did the District's deviation from the SEU from -21.2% to -22.6%, which indicates that the District has continued to not underutilize female employees in this category.

Special Education Para Educators. This job category includes support staff for special needs students, including braillists and hearing impaired interpreters.

Year	Total Employees	Total Ethnic Minority	% Ethnic Minority	TA (%)	Deviation from TA (%)	SEU (%)	Deviation from SEU (%)
2016	448	74	16.5%	15.7%	(0.8)%	12.6%	(3.9)%
2011	216	30	13.8%	5.1%	(8.7)%	4.1%	(9.7)%
2006	177	17	9.6%	5.1%	(4.5)%	4.1%	(5.5)%

Year	Total Employees	Total Female	% Female	TA (%)	Deviation from TA (%)	SEU (%)	Deviation from SEU (%)
2016	448	419	93.5%	92.4%	(1.1)%	73.9%	(19.6)%
2011	216	199	92.1%	87.6%	(4.5)%	70.1%	(22)%
2006	177	164	92.7%	87.6%	(5.1)%	70.1%	(22.6)%

Analysis: The total number of special education para educators increased substantially between 2011 and 2016, including increases in both the number of ethnic minority and

female employees in this job category. While the theoretical availability of minority and female employees has also increased, the District's deviation from the SEU is -3.9% for minorities and -19.6% for females, indicating that the District has continued to not underutilize minority or female employees in this category.

Transportation. This job category includes bus drivers, dispatchers, bus mechanics, and truck drivers.

Year	Total Employees	Total Ethnic Minority	% Ethnic Minority	TA (%)	Deviation from TA (%)	SEU (%)	Deviation from SEU (%)
2016	232	38	16.4%	21.2%	4.8%	16.9%	0.5%
2011	112	10	8.9%	20.5%	11.6%	16.4%	7.5%
2006	143	16	11.2%	20.5%	9.3%	16.4%	5.2%

Year	Total Employees	Total Female	% Female	TA (%)	Deviation from TA (%)	SEU (%)	Deviation from SEU (%)
2016	232	111	47.8%	38.2%	(9.6)%	30.6%	(17.2)%
2011	112	64	57.1%	46.6%	(10.5)%	37.3%	(19.8)%
2006	143	76	53.1%	46.6%	(6.5)%	37.3%	(15.8)%

Analysis: The total number of employees in this category increased by 120 individuals between 2011 and 2016. The number of ethnic minority employees in transportation increased as did the theoretical availability. The District currently deviates by 0.5% from the SEU with respect to ethnic minority employees in transportation, a decrease of 7% since 2011. While it is unclear whether the new deviation percentage represents meaningful underutilization, the District will ensure that recruitment efforts continue to reach ethnic minorities as well as other protected and non-protected groups in this job category with a goal of decreasing its current deviation from the SEU over the next five years.

The number of female employees in this category also increased, while their theoretical availability decreased by 8.4%. The District currently deviates from the SEU by -17.2% with respect to female employees in transportation. While this is a slight decrease from 2011, the new margin indicates that the District does not underutilize female employees in this job category.

## **C. GOALS AND ACTION STEPS FOR RECRUITMENT**

The major goals of this Affirmative Action Plan are the following: Promote equal employment opportunities in the District; increase the pool of diverse and qualified applicants for employment in the District consistent with the District's standard of excellence; and encourage upward mobility of all persons, including members of protected groups, once employed.

### **Goal 1: Job Analysis, Recruitment, and Selection**

The District will actively seek a diverse pool of qualified applicants from all protected groups, as well as non-protected groups, for certificated and classified positions at all levels so that more members of underrepresented groups are available for consideration as District employees.

#### **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 effectively reach all protected groups, as well as non-protected groups. Focus recruitment on protected groups identified herein as statistically underutilized to ensure that each group is reached.
- 1.3 Increase the efficiency of the application system to support ease of use for all candidates and effective reporting to assist in recruitment.
- 1.4 Increase awareness of the District's commitment to equal employment opportunity among all personnel involved in hiring, and monitor hiring to ensure District-wide compliance with this Plan.

### **Goal 2: Education and Training**

The District will promote a culture of respect and diversity in the workplace, and ensure that employees are aware of the Affirmative Action Plan as well as their roles and responsibilities in enforcing the District's equal employment opportunity policies.

#### **Action Programs**

- 2.1 Continue to emphasize development of annual objectives and strategies at each building to increase gender equity and multicultural and mainstreaming opportunities in both the instructional and activities program. Each staff member has responsibility for carrying out the equal employment strategies outlined in the Affirmative Action Plan.
- 2.2 Provide support for schools to develop and implement multicultural and gender equity training programs and special projects.
- 2.3 Incorporate multicultural and gender equity concepts into District curriculum.

- 2.4 Utilize other means of promotion and information dissemination as necessary to ensure that the community and District staff and students are informed of the District's equal educational and employment opportunities.

### **Goal 3: Preventing Employment Discrimination**

The District will ensure that it does not unlawfully discriminate against any person on the basis of any protected status in employment, recruitment, promotion, or advancement.

#### Action Programs

- 3.1 Maintain credential requirements for all personnel.
- 3.2 Make no differentiation in pay scale on the basis of any protected status.
- 3.3 Make no differentiation in the assignment of school duties on the basis of any protected status, except where there is a compelling need for a lawful, bona fide occupational qualification based on the nature of the duties (e.g. a gender-based qualification for an assignment that involves supervising students in areas or situations in which students might be disrobed).
- 3.4 Provide the same opportunities for advancement without regard to a protected status.
- 3.5 Make no differentiation 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 non-instructional duties on the basis of any protected status.

#### **D. STAFF RESPONSIBILITIES FOR IMPLEMENTATION, MONITORING, AND EVALUATION OF PROGRESS**

The Superintendent has the overall responsibility for the development, implementation, coordination, evaluation, and monitoring of the Affirmative Action Plan. The Superintendent will provide leadership and guidance to all administrators, supervisors, and personnel in the conduct of their employment practices to assure conformity with relevant federal and state laws and regulations and District policies.

The Superintendent has delegated much of work under these responsibilities to the Human Resources Department. The Director of Human Resources is designated as the District's Affirmative Action Officer and is responsible to the Superintendent for District compliance with the principles set forth in this Affirmative Action Plan. The responsibilities of the Affirmative Action Officer include the following:

1. Issuing all statements concerning the District's Affirmative Action Plan.
2. Identifying problem areas with respect to underutilized protected groups.
3. Formulating recommendations or directives for solving identified problems.

Contact information for the District's Director of Human Resources/Affirmative Action Officers is as follows:

Director of Human Resources  
Lake Washington School District  
16250 NE 74th Street  
P.O. Box 97039  
Redmond, WA 98073  
Telephone: (425) 936-1266

#### **E. INTERNAL MONITORING AND REPORTING PROCESS**

The Human Resources Department is responsible for documenting compliance with this Affirmative Action Plan, which includes maintaining a quarterly statistical analysis and updating employment data to measure the effectiveness of the Affirmative Action Plan, and to highlight any areas of imbalance, if present.

The Human Resources Department is also responsible for implementing the District's equal employment opportunity policies and, further, for making known the District's desire and commitment to employ members of protected and non-protected groups through regular and frequent contact with community groups and employment agencies. Human Resources will also identify, to the extent reasonably possible, persons with requisite skills and talents for projected openings throughout the District. Human Resources will ensure that recruitment efforts reach protected and non-protected groups in all categories in which underutilization exists.

In accordance with the implementation and evaluation process described above, the District will review and update this Affirmative Action Plan every five years.



## **Internal Audit and Reporting**

Human Resources maintains a confidential employee and applicant tracking system—separate from the pre-employment application process—which records the sex, race/ethnicity, veteran status, disability status, and age of applicants. Frequent monitoring of this data will help ensure that all applicants receive equal treatment in the hiring process and that the District’s recruiting efforts reach all protected and non-protected groups. However, all pre-employment application forms will exclude unlawful inquiries that unnecessarily elicit the race, gender, or membership of the applicant in other protected groups.

A careful review of all job descriptions and job postings will be made to ensure non-discrimination.

All screening interview questions will be checked and monitored to ensure non-discrimination.

Human Resources will prepare and submit required reports to state and federal agencies concerning employment practices.

Human Resources will provide written reports each year to the Board of Directors on the results of any utilization analysis performed in connection with this Affirmative Action Plan and on the status of any efforts taken by the District to promote its equal employment opportunity policy. Perceived, apparent, or reported inequities will be formally noted and included in the annual report to the Board of Directors.

## **Dissemination of Policies**

It is the responsibility of the Superintendent of the Lake Washington School 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 this Affirmative Action Plan will be accomplished as follows:

1. The 2017 – 2022 Affirmative Action Plan and nondiscrimination policy are posted on the District’s official website. Complaint procedures pursuant to these policies are also posted on the website.
2. The District will publish an annual notice of the District’s nondiscrimination policy and Affirmative Action Plan prior to the beginning of the school year. Such publication will include the name, address, and telephone number of the District’s Affirmative Action Officer.
3. A statement of the District’s commitment to equal employment opportunity will be included in all District publications, employment announcements, vendor contracts, and other related District documents. The District will inform all appropriate and interested recruiting sources of District policies regarding nondiscrimination.

4. The District will include an equal employment opportunity statement on all District job postings and newspaper advertisements.

## **Supportive Systems**

### Recruitment and Employment Plan

Human Resources 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 discrimination against any applicant or employee on the basis of race, creed, religion, color, national origin, honorably discharged veteran or military status, sexual orientation including gender expression or identity, the presence of any sensory, mental, or physical disability, or the use of a trained guide dog or service animal by a person with a disability. A continuing review of hiring criteria is made to ensure the relevance of job qualifications to the tasks to be performed and the needs of a position.

Further, the District promotes continued relationships with organizations that are a recruitment source for individuals within protected groups, including groups which may currently be underutilized in the work force. These organizations include state job service agencies, nonprofit organizations providing employment training and college and university placement offices.

The District maintains a distribution list containing names and addresses of agencies where job announcements are mailed. Job announcements are distributed to each building in the District, posted on the District's website, and distributed to each external employment and referral source on the distribution list. The District may also advertise jobs in newspapers, on websites and on relevant position-specific organizations (apprenticeship programs, etc.).

The District places specific emphasis on outreach to and recruitment of members of protected groups. The distribution list noted above will be reviewed and expanded to include agencies serving minority communities. Finally, District public relations and recruitment brochures will feature images of minority and non-minority women and men.

### Training

Lake Washington School District recognizes the importance on ongoing training for employees to upgrade skills and to assist in personal growth. The District will continue to provide staff development opportunities and to assist individual employees with career counseling through the District's employee assistance program, if needed. Lake Washington School District recognizes the importance on ongoing training for employees to upgrade skills and to assist in personal growth. The District will continue to provide staff development opportunities and to assist individual employees with career counseling through the District's employee assistance program, if needed. Additionally, the district has implemented Equity Training for all administrators through a partnership with Puget Sound Educational Service District's Equity in Education Program and has convened an Equity Committee. The District also provides a variety of professional development

opportunities for staff members, including those on differentiation, restorative practices and supporting at-risk students.

## **APPENDIX A: POLICIES AND LEGAL REFERENCES**

### **POLICY GBA          Equal Employment Opportunity**

Lake Washington School District is firmly committed to equal employment opportunity and to its Affirmative Action Plan. The District is committed to increasing the diversity of its workforce without preferential treatment on the basis of race, creed, religion, color, national origin, honorably discharged veteran or military status, sexual orientation including gender expression or identity, the presence of any sensory, mental, or physical disability, or the use of a trained guide dog or service animal by a person with a disability. To these ends, the District has an ongoing Affirmative Action Plan, which advances equal employment opportunity.

The scope of this policy and the Affirmative Action Plan shall be comprehensive, and shall cover all aspects of treatment of employees and applicants, including employment opportunities, compensation, hours of work, conditions of employment, promotions, demotions, transfers, recruitment, advertising, layoff, and termination.

The Board of Directors shall provide resources for equal employment opportunities to implement the above statement.

### **Employment of Persons with Disabilities**

The District recognizes its obligation under applicable federal, state, and local laws to provide reasonable accommodation to allow individuals with disabilities to apply for and perform the essential functions of their jobs. If an employee has a disability and wishes reasonable accommodation, he or she should inform his or her supervisor or the Human Resources Director as soon as possible. The District will discuss with the employee the possibility of providing reasonable accommodation. The District shall make reasonable accommodations that may be accomplished without undue hardship to the District. An important factor to be considered shall be the nature and cost of the accommodation. However, an employment opportunity shall not be denied on the basis of the need for reasonable accommodation.

If an employee becomes unable to perform the essential functions of his or her job, even with reasonable accommodation, he or she should ask the Human Resources Director for assistance in identifying and applying for other jobs with the District that may become available and for which he or she may be qualified.

### Nondiscrimination

Lake Washington School District prohibits unlawful discrimination against employee or applicant for employment by reason of race, creed, religion, color, national origin, honorably discharged veteran or military status, sexual orientation including gender expression or identity, the presence of any sensory, mental, or physical disability, or the use of a trained guide dog or service animal by a person with a disability.

### Legal References

Title VI, Civil Rights Act of 1964

Title VII, Civil Rights Act of 1964, as amended by the Equal Employment Opportunity Act

Executive Order 11246, as amended by Executive Order 11375

Equal Pay Act, as amended by the Education Amendments of 1972

Rehabilitation Act of 1973, section 504

Individuals with Disabilities Education Act of 1990

Age Discrimination in Employment Law, P.L. 95-256

Americans with Disabilities Act of 1990

RCW 28A.400.310

RCW 28A.640, generally

RCW 28A.642, generally

RCW 49.60

WAC 392-190, generally

### Contract References

Lake Washington Education Association Agreement, Articles VII, XIII

Lake Washington School District Trades Bargaining Council Agreement, Nondiscrimination

Public, Professional and Office-Clerical Employees and Drivers Local Union No. 763 (Representing the Food Services Employees)

Lake Washington Association of Educational Office Personnel/CPEA-WEA-NEA

Lake Washington Instructional Assistants Represented by Service Employees International Union, Local #6

### Cross References

EFB, Free and Reduced Price Food Services

GBA, Equal Employment Opportunity  
JB, Equal Educational Opportunities

**APPENDIX B: EQUAL EMPLOYMENT OPPORTUNITY GRIEVANCE  
PROCEDURES**

**Discrimination Complaint Procedure**

Anyone may file a complaint against the District alleging that the District has violated anti-discrimination laws. This complaint procedure is designed to assure that the resolution of real or alleged violations are directed toward a just solution that is satisfactory to the complainant, district administration, and the Board of Directors. Complaint means a written, signed charge alleging specific acts, conditions, or circumstances which are in violation of the anti-discrimination laws. The time period for filing a complaint is one year from the date of the occurrence that is the subject matter of the complaint. However, a complaint filing deadline may not be imposed if the complainant was prevented from filing due to: (1) specific representations by the District that it had resolved the problem forming the basis of the complaint; or (2) withholding of information that the District was required to provide under WAC 392-190-065 or WAC 392-190-005. Complaints may be submitted by mail, fax, e-mail or hand-delivery to any building principal or to the Director listed below that is responsible for investigating discrimination complaints.

**Informal Complaint Process**

Anyone may use these informal procedures to report and resolve complaints of discrimination. Complaints may be made orally, in writing, and may also be made anonymously. Complainant should understand that an anonymous complaint might not be resolved to the complainant's satisfaction due to the limitations placed on the investigation by the anonymity. All attempts shall be made to keep the identity of the the complainant confidential, although confidentiality cannot be guaranteed. For students and staff, informal complaints should first be brought to the attention of the building principal or supervising administrator. If the problem is not addressed at the building level, the individual should bring the complaint to 1) the Director of Human Resources for matters pertaining to employees; or 2) the Director of Student Services for matters pertaining to students; or 3) the Director of Special Services for matters pertaining to a student's disability or participation in a Section 504 plan.

<b>Civil Rights Coordinator</b>	<b>Title IX Coordinator</b>	<b>Section 504/ADA</b>
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		<b>Coordinator</b>
Director of Human Resources 16250 NE 74th Street Redmond, WA 98052 (425) 936-1266 civilrights@lwsd.org	Director of Student Services 16250 NE 74th Street Redmond, WA 98052 (425) 936-1289 titleix@lwsd.org	Director of Special Services 16250 NE 74th Street Redmond, WA 98052 (425) 936-1407 section504@lwsd.org

## **Formal Complaint Process**

### Level One – Complaint to School District

Anyone may initiate a formal complaint of discrimination even if the informal complaint process was initially utilized. All formal complaints shall be in writing; shall be signed by the complainant; and shall set for the specific acts, conditions, or circumstances alleged to have occurred that constitute discrimination. Formal complaints may be addressed to the Civil Rights Coordinator, Title IX Coordinator, or Section 504/ADA Coordinator.

Complainant shall be informed that due process requirements may require that the District release all of the information regarding the complaint to the accused, thus the identity of the complainant may not remain confidential. The District will, however, fully implement the anti-retaliation provisions contained within District policy to protect both complainants and witnesses.

Upon receipt of the complaint, the Coordinator to whom the complaint was brought will initiate an investigation into the allegations and effect a prompt resolution of the complaint. The Coordinator to whom the complaint was brought will respond in writing to a formal complaint no later than thirty (30) calendar days following the district's receipt of the complaint, unless otherwise agreed to by the complainant. The written response shall clearly state whether the District: (1) Denies the allegations contained in the complaint; or (2) Confirms the allegations and lists the corrective measures that the District intends to take to eliminate the discrimination. The response shall also include notice of the complainant's right to appeal to the school district as set forth in state law and this policy, including an identification of where and to whom the appeal shall be filed.

Corrective measures deemed necessary by the Coordinator, in consultation with other appropriate District staff, will be instituted as quickly as possible, but in no event later than thirty (30) calendar days after the written response, unless the accused is appealing the imposition of discipline and the District is prevented by due process considerations or a lawful order from imposing the discipline until the appeal process is concluded.

### Level Two – Appeal to School District

If a complainant remains aggrieved as a result of the action or inaction of the Coordinator, the complainant may appeal to the Superintendent's office by filing a written notice of appeal with the Superintendent's office on or before ten (10) calendar

days following the date upon which the complainant received the Coordinator's response. Both parties shall be allowed to present such written facts, witness statements, or other documentation as the Superintendent or designee deems relevant and material. Unless otherwise agreed to by the complainant and the Superintendent or designee or for good cause, the Superintendent or designee shall render a written decision on or before thirty (30) calendar days following the filing of the written notice of appeal. The decision will be provided in a language that the complainant can understand which may require language assistance for complainants with limited English proficiency. The written decision shall include notice of the complainant's right to appeal to the Office of the Superintendent of Public Instruction as set forth below.

#### Level Three – Complainant to the Superintendent of Public Instruction

If a complainant remains aggrieved as a result of the decision in resolving a complaint, the complainant may appeal to the Office of the Superintendent of Public Instruction by filing a written notice of appeal by twenty (20) calendar days following the date upon which the complainant received written notice of the Superintendent's decision. Such appeal shall be in writing, include a concise statement of the Superintendent's decision that is being appealed, and the relief requested.

#### **Mediation**

At any time during the complaint procedure, the district may offer mediation consistent with the procedures set forth in WAC 392-190-0751. The complainant and the district may agree to extend the complaint process deadlines in order to pursue mediation.

The purpose of mediation is to provide both the complainant and the district an opportunity to resolve disputes and reach a mutually acceptable agreement through the use of an impartial mediator.

#### **Discipline/Remedial Action**

The District will take prompt, equitable, and remedial action within its authority on formal and informal complaints alleging discrimination that come to the attention of the District. Engaging in discrimination will result in appropriate discipline or other sanctions against offending staff. Others who engage in discrimination on District property or while at District activities may have access to District property and activities restricted or contracts cancelled, as appropriate. The District affirms its commitment that persons found to have been subjected to discrimination will have appropriate District services made reasonably available to them and adverse consequences of the discrimination shall be reviewed and remedied as appropriate.

