OFFICE OF FEDERAL CONTRACT COMPLIANCE PROGRAMS (OFCCP)
AFFIRMATIVE ACTION PROGRAM (AAP)
FOR SECTION 503 OF THE REHABILITATION ACT

Plan Effective Date: November 1, 2016

Plan Expiration Date: October 31, 2017

AAP Administrator: Steven Massie
Executive Director of HR & AA

Approved by: Dr. Tracy D. Hall
President

Establishment's Name: Southwest Tennessee Community College

1 - Southwest Tennessee CC

Establishment's Address: 5983 Macon Cove
Memphis, TN 38134

Southwest Tennessee Community College

AFFIRMATIVE ACTION PROGRAM

for

INDIVIDUALS WITH DISABILITIES

CONFIDENTIAL TRADE SECRET MATERIALS

The material set forth in the AAP is deemed to constitute trade secrets, operations information, confidential statistical data, and other confidential commercial and financial data, within the meaning of the Freedom of Information Act, U.S.C. 552, Title VII of the Civil Rights Act of 1964 (as amended), 42 U.S.C. 2000e et seq., the Trade Secrets Act, 18 U.S.C. 1905, and 44 U.S.C. 3508, the disclosure of which is prohibited by law and would subject the individual making the disclosure to criminal and/or civil sanctions.

Southwest Tennessee Community College

AFFIRMATIVE ACTION PROGRAM FOR INDIVIDUALS WITH DISABILITIES

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I. Equal Employment Opportunity (EEO) Policy Statement (41 CFR 60-741.44(a))

The *EEO Policy Statement* on the following page is posted on our company's bulletin board along with our required employment posters and is viewable by both employees and applicants. The *EEO is the Law* poster is also posted on our company's bulletin board as well as made available electronically through our company website for viewing by online applicants.

Southwest Tennessee Community College
EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT

It is the policy of Southwest Tennessee Community College not to discriminate against any employee or applicant for employment because of his or her race, color, religion, sex, sexual orientation, gender identity, national origin, or because he or she is an individual with a disability or disabled veteran, Armed Forces service medal veteran, recently separated veteran, or active duty wartime or campaign badge veteran, or thereinafter referred collectively as "protected veterans." It is also the policy of Southwest Tennessee Community College to take affirmative action to employ and to advance in employment, all persons regardless of their status as individuals with disabilities or protected veterans, and to base all employment decisions only on valid job requirements. This policy shall apply to all employment actions, including but not limited to recruitment, hiring, upgrading, promotion, transfer, demotion, layoff, recall, termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship, at all levels of employment. Furthermore, the company will provide qualified applicants and employees who request an accommodation due to a disability with reasonable accommodations, as required by law.

Southwest Tennessee Community College prohibits harassment of employees and applicants because they are individuals with disabilities or protected veterans. Southwest Tennessee Community College also prohibits retaliation against employees and applicants for filing a complaint, opposing any discriminatory act or practice, assisting or participating in any manner in a review, investigation, or hearing or otherwise seeking to obtain their legal rights under any Federal, State, or local EEO law requiring equal employment opportunity for individuals with disabilities and protected veterans. Prohibited retaliation includes, but is not limited to, harassment, intimidation, threats, coercion or other adverse actions that might dissuade someone from asserting their rights.

As President of Southwest Tennessee Community College, I am committed to the principles of affirmative action and equal employment opportunity. In order to ensure dissemination and implementation of equal employment opportunity and affirmative action throughout all levels of the company, I have selected Steven Massie as the Executive Director of HR & AA for Southwest Tennessee Community College. One of the Executive Director of HR & AA's duties will be to establish and maintain an internal audit and reporting system to allow for effective measurement of Southwest Tennessee Community College's programs.

In furtherance of Southwest Tennessee Community College's policy regarding affirmative action and equal employment opportunity, Southwest Tennessee Community College has developed a written Affirmative Action Program (AAP) which sets forth the policies, practices and procedures that Southwest Tennessee Community College is committed to in order to ensure that its policy of nondiscrimination and affirmative action for qualified individuals with disabilities and qualified protected veterans is accomplished. This AAP is available for inspection by any employee or applicant for employment upon request between 9:00 AM to 4:00 PM at the Human Resources department. Any questions should be directed to me, your supervisor, or Steven Massie, Executive Director of HR & AA.

Tracy D. Hall

Dr. Tracy D. Hall
President
Southwest Tennessee Community College
November 1, 2016

II. Review of Personnel Processes (41 CFR 60-741.44(b))

Southwest Tennessee Community College complies with the requirement to "periodically review" its personnel processes by reviewing these processes annually to determine whether its present procedures assure careful, thorough, and systematic consideration of the qualifications of known individuals with disabilities. As part of this review, Southwest Tennessee Community College also ensures that its personnel processes do not stereotype individuals with disabilities in a manner which limits their access to all jobs for which they are qualified. This review covers all procedures related to the filling of job vacancies either by hire or by promotion, as well as to all training opportunities offered or made available to employees.

The following is a set of procedures which may be used to meet the requirements of §60-741.44(b):

1. Applicant records are maintained which indicate whether or not an applicant self-identified as an individual with a disability. This information can be retrieved for review by the Department of Labor and the contractor's personnel officials for use in investigations and internal compliance activities.
2. Records are maintained which indicate employees considered for competitive promotions within the organization. Employees are given the opportunity to voluntarily self-identify disability status.
3. Records are maintained regarding training opportunities granted to employees which include whether or not the employee has self-identified as an individual with a disability.
4. Any time a known applicant or employee with a disability is rejected for employment, promotion, or training, the company prepares a statement outlining the reason.
5. Requests for accommodation due to a disability are maintained along with the nature of the request and whether or not the accommodation was granted. If the accommodation was denied, the company prepares a statement describing the reason for denying the accommodation request. All accommodation records are treated as a confidential medical record in accordance with §60-741(d).

III. Review of Physical and Mental Job Qualification Standards (41 CFR 60-741.44(c))

Southwest Tennessee Community College reviews the physical and mental job qualification standards of each job opening before it is publicly or internally posted to ensure that, to the extent that such qualification requirements tend to screen out qualified individuals with disabilities, they are related to the job(s) in question and consistent with business necessity and the safe performance of the job. The physical and mental qualifications are also reviewed as new jobs are established or job requirements are modified.

All job qualification requirements were found to be job related and consistent with business necessity and safety. Southwest Tennessee Community College will continue to review physical and mental job qualification requirements whenever a job vacancy will be filled through either hiring or promotion and will conduct a qualifications review whenever job duties change.

If Southwest Tennessee Community College at any time should inquire into an applicant's physical or mental condition or should conduct a medical examination, such inquiries or exams will be conducted in accordance with the Section 503 regulations and the information obtained as a result of the inquiry or exam will be kept confidential, except as otherwise provided for in the Section 503 regulations. The results of the examination or inquiry will only be used in accordance with the Section 503 regulations.

IV. Reasonable Accommodation to Physical and Mental Limitations (41 CFR 60-741.44(d))

Southwest Tennessee Community College will continue its longstanding commitment to making reasonable accommodation to the known physical or mental limitations of qualified individuals with disabilities unless doing so would impose an undue hardship on the operation of its business. The company also commits to engaging in an interactive process with the person requesting the accommodation (or the person's representative), as needed, to determine an appropriate accommodation.

If an employee with a known disability has significant difficulty performing his or her job and it is reasonable to conclude that the performance problem may be related to the known disability, the manager or appropriate HR personnel will confidentially notify the employee of the performance problem and inquire whether the problem is related to the employee's disability. If the employee indicates that the performance problems are related to his or her disability, the employee is asked if reasonable accommodation is needed.

In determining the extent of the company's accommodation obligations, the following factors are considered:

1. Business necessity; and
2. Financial cost and expense.

Southwest Tennessee Community College will also ensure that all requests for reasonable accommodation and any medical or disability-related information provided to Southwest Tennessee Community College will be treated as confidential medical records and maintained in a separate medical file.

V. Anti-Harassment Procedures (41 CFR 60-741.44(e))

Employees and applicants of Southwest Tennessee Community College will not be subject to harassment because of disability. Retaliation, including intimidation, threat, coercion, or discrimination, against an employee or applicant because they have objected to discrimination, engaged or may engage in filing a complaint, assisted in a review, investigation, or hearing or have otherwise sought to obtain their legal rights under any Federal, State, or local EEO law regarding individuals with disabilities is prohibited. Any employee or applicant who believes that he or she has been subject to retaliation should promptly contact a manager in their chain of command, or promptly contact the EEO Coordinator for assistance.

This policy is made available for employees and applicants to view. Furthermore, Southwest Tennessee Community College monitors its environment for the presence of any forms of harassment, intimidation, or coercion and, where warranted, takes corrective action.

VI. External Dissemination of Policy, Outreach, and Positive Recruitment (41 CFR 60-741.44(f))

Southwest Tennessee Community College undertakes appropriate outreach and positive recruitment efforts in order to effectively attract individuals with disabilities. In order to comply with the external dissemination of the EEO and Affirmative Action policy, the company provides written or electronic notification to all current subcontractors, vendors, and suppliers and will continue to do so on an annual basis. The company will also provide such notification to new subcontractors, vendors, and suppliers upon entering into a relationship with them. Southwest Tennessee Community College has informed its recruiting sources, including State employment agencies and local employment service delivery systems, of the company's policy concerning the employment of qualified individuals with disabilities and will notify them of employment opportunities as they become available. Southwest Tennessee Community College requested all recruiting sources to actively recruit and refer qualified persons for job opportunities. Southwest Tennessee Community College will include the equal opportunity clause concerning the employment of qualified individuals with disabilities in all non-exempt subcontracts and purchase orders. See Appendix A for detailed information regarding our outreach and positive recruitment activities during the AAP year.

VII. Internal Dissemination of Policy (41 CFR 60-741.44(g))

Southwest Tennessee Community College has developed internal procedures to communicate its obligation to engage in affirmative action efforts to employ and advance in employment qualified individuals with disabilities. Procedures are designed to foster understanding, acceptance, and support among all employees and to encourage them to help Southwest Tennessee Community College meet this obligation.

The company realizes that an outreach program is ineffective without the adequate internal support from management personnel and other employees. In order to ensure greater employee cooperation and participation in the company's affirmative action efforts, Southwest Tennessee Community College has adopted policies and engaged in activities which are not limited to the following:

1. Copy of our AAP for Individuals with Disabilities is available for inspection to any employee or applicant upon request;
2. *EEO Policy Statement* and the *EEO is the Law* poster are placed on bulletin boards located throughout our facilities and work areas;
3. Electronic versions of the *EEO Policy Statement* and the *EEO is the Law* poster are clearly labeled and posted on the company's intranet;
4. Meetings with executive, management, and supervisory personnel are held to explain the intent of the policy and individual responsibility for effective implementation;
5. Managers and supervisors are provided with affirmative action and EEO training upon commencement of their management roles;
6. Policy is discussed during employee orientation;
7. Union officials and/or employee representatives are informed of these policies;
8. When employees are featured in publications, individuals with disabilities are included when available.

VIII. Audit and Reporting Systems (41 CFR 60-741.44(h))

The Executive Director of HR & AA has the responsibility for the preparation and implementation of the AAP. Responsibility for the effective implementation of the AAP is also vested with each department manager and supervisor.

The following activities are reviewed at least annually to ensure freedom from discrimination against, or stereotyping of, individuals with disabilities in any manner. The results of the most recent self-audit are included in Appendix B. During the self-audit, the following activities are reviewed:

1. Recruitment, advertising, and job application procedures;
2. Implementation of hiring, promotion, upgrading, award of tenure, layoff, and recall from layoff;
3. Rates of pay and any other forms of compensation including fringe benefits;
4. Job assignments, job classifications, job descriptions, and seniority lists;
5. Awarding of sick leave, leaves of absence, or implementation of any other leave policies;
6. Participation in training, mentoring, or apprenticeship programs, and attendance at professional meetings and conferences; and
7. Application of any other term, condition, or privilege of employment, including participation in company-sponsored educational, training, recreational, and social activities.

Southwest Tennessee Community College's audit system includes periodic reports provided by Executive Director of HR & AA documenting Southwest Tennessee Community College's efforts to achieve its EEO/AAP responsibilities. Managers and supervisors are asked to report any current or foreseeable EEO problem areas and are asked to outline their suggestions/recommendations for solutions.

The following documents are maintained as a component of Southwest Tennessee Community College's internal audit process: documentation of self-audit; summary data of personnel activity including external job offers and hires, promotions, resignations, terminations, and layoffs by job group relating to individuals with disabilities; and an applicant flow log showing the name, race, ethnicity, sex, disability status, veteran status, date of application, job title, and action taken for

all individuals applying for job opportunities.

IX. Responsibility for Implementation (41 CFR 60-741.44(i))

A. Responsibilities of EEO Coordinator:

Steven Massie, the Executive Director of HR & AA, has been designated to direct the activities of the affirmative action program. This person has the responsibility for ensuring the effective implementation of the company's AAP. These responsibilities include, but are not limited to:

1. Implementing the AAP for individuals with disabilities, policy statements, personnel policies and procedures, internal and external communication of the policy, and monitoring the effectiveness of these actions;
2. Reviewing all personnel actions, policies, and procedures to ensure compliance with Southwest Tennessee Community College's affirmative action obligations;
3. Assisting Human Resources department with reviewing the qualifications of all applicants and employees considered/eligible for hiring, promotion, transfer, or layoff/reduction in force to ensure qualified individuals with disabilities are treated in a nondiscriminatory manner when hiring, promotion, transfer, or layoff/reduction in force occur;
4. Assisting in the development of solutions for any identified problem areas;
5. Monitoring the effectiveness of the program on a continuing basis through the development and implementation of an internal audit and reporting system that measures the effectiveness of the program;
6. Keeping management informed of equal opportunity progress and problems within the company through, at a minimum, periodic reports;
7. Providing department managers with a copy of the AAP for individuals with disabilities and reviewing the program with them on an annual basis to ensure knowledge of their responsibilities for implementation of the program;
8. Reviewing the company's AAP for individuals with disabilities with all managers and supervisors at all levels to ensure that the policy is understood and is followed in all personnel activities;
9. Assisting in ensuring that career development of employees who are individuals with disabilities is equal to that of other employees;
10. Auditing the contents of company bulletin boards to ensure that required information is posted and up-to-date;

11. Serving as a liaison between Southwest Tennessee Community College and enforcement agencies; and
12. Serving as a liaison between Southwest Tennessee Community College and outreach and recruitment sources for individuals with disabilities.

B. Responsibilities of Managers and Supervisors:

Managers and supervisors are advised annually of their responsibilities under the company's AAP for individuals with disabilities. These responsibilities include, but are not limited to:

1. Reviewing the company's affirmative action policy for individuals with disabilities with subordinate managers and supervisors to ensure that they are aware of the policy and understand their obligation to comply with it in all personnel actions;
2. Reviewing the qualifications of all applicants and employees to ensure individuals with disabilities are treated in a nondiscriminatory manner when hiring, promotion, transfer, or layoff/reduction in force occur; and
3. Reviewing all employees' performance to ensure that non-discrimination is adhered to in all personnel activities.

X. Training (41 CFR 60-741.44(j))

All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes receive annual training regarding Southwest Tennessee Community College's AAP and their role in its implementation. Employees hired or promoted into these roles also receive training on regulatory requirements under Section 503 of the Rehabilitation Act soon after being hired or placed into these roles.

During the annual training, personnel are advised of their responsibilities under the AAP for individuals with disabilities and of their obligations to:

- Assist in the identification of problem areas, formulate solutions, and establish departmental goals and objectives when necessary;
- Ensure qualified applicants and employees who are individuals with disabilities are treated in a nondiscriminatory manner in all employment practices, including when making selection decisions, such as for hire, promotion, training, or to receive awards or bonuses:
- Provide reasonable accommodation to the known physical or mental limitations of qualified individuals with disabilities unless such accommodation would impose an undue hardship on the conduct of its business;
- Maintain confidentiality of any information regarding self-identification of individuals with disabilities; and
- Ensure that nondiscrimination is adhered to in all personnel activities.

XI. Applicant and Hiring Data (41 CFR 60-741.44(k))

Southwest Tennessee Community College collects employee data pertaining to individuals with disabilities in order to assess the effectiveness of the company's outreach and recruitment efforts. We invite applicants to voluntarily inform the company whether they believe they are individuals with disabilities in compliance with the Section 503 requirements. This data will be maintained for three years.

Southwest Tennessee Community College
Data Collection by Plan - Disabled
Analysis Date Range is 11/01/2015 - 10/31/2016

Plan	*Total Applicants*	*Total Disabled Applicants*	*Total Hires*	*Total Disabled Hires*	*Job Openings*	*Jobs Filled*
1 - Southwest Tennessee CC	1,296	0	61	0	61	61
Total	1,296	0	61	0	61	61

XII. Utilization Analysis (41 CFR 60-741.45(d))

The utilization analysis is designed to evaluate the representation of individuals with disabilities in each job group within the contractor's workforce with the 7 percent utilization goal established by the OFCCP. The utilization goal is not a rigid and inflexible quota which must be met, nor is it to be considered either a ceiling or a floor for the employment of particular groups. Quotas are expressly forbidden.

Southwest Tennessee Community College
Utilization Analysis Detail - Disabled
Analysis Data as of 10/31/2016

Plan: 1 - Southwest Tennessee CC

Goal for Individuals with Disabilities: 7.00%

	Employees						
	Total	*Disabled*		*Goal*	*Underutilized*	*Shortfall*	
Job Group	*#*	*#*	*%*	*Set?*	*#*	*#*	*≥ 0.01?*
H10 - ADMINISTRATIVE	21	1	4.76%	Yes	0.47	0.47	Yes
H20 - FACULTY	197	3	1.52%	Yes	10.79	10.79	Yes
H30 - PROFESSIONAL	155	2	1.29%	Yes	8.85	8.85	Yes
H40 - CLERICAL/SUPPORT	86	0	0.00%	Yes	6.02	6.02	Yes
H50 - TECHNICAL/PARAPROFESSIONAL	27	1	3.70%	Yes	0.89	0.89	Yes
H60 - SKILLED TRADES	11	0	0.00%	Yes	0.77	0.77	Yes
H70 - SERVICE/MAINTENANCE	64	0	0.00%	Yes	4.48	4.48	Yes
Total	561	7	1.24%				

XIII. Identification of Problem Areas and Action-oriented Programs (41 CFR 60-741.45(e) and (f))

When the percentage of individuals with disabilities in one or more job groups is less than the utilization goal, the company takes steps to determine whether and where impediments to equal employment opportunity exist. When making this determination, we assess personnel processes, the effectiveness of the outreach and recruitment efforts, the results of our affirmative action program audit, and any other areas that might affect the success of the affirmative action program.

The company develops and executes action-oriented programs designed to correct any identified problems areas. These action-oriented programs may include the modification of personnel processes to ensure equal employment opportunity for individuals with disabilities, alternative or additional outreach and recruitment efforts, and/or other actions designed to correct the identified problem areas and attain the established goal. Appendix C documents action-oriented programs Southwest Tennessee Community College will implement to address any problem areas.

Southwest Tennessee Community College
Disability Goal Attainment Summary
Analysis Data as of 10/31/2016

Plan: 1 - Southwest Tennessee CC

Goal for Individuals with Disabilities: 7.00%

As of 10/31/2015
Plan Utilization: 1.31%
Total Employees: 610
Individuals with Disabilities: 8

As of 10/31/2016
Plan Utilization: 1.24%
Total Employees: 561
Individuals with Disabilities: 7

	Representation as of 10/31/2015			*Representation as of 10/31/2016*					
Job Group	*Total #*	*Disabled #*	*Disabled %*	*Total #*	*Disabled #*	*Disabled %*	*Trend*	*Goal Set at Plan Date?*	*7.00% Goal Met?*
H10 - ADMINISTRATIVE	21	1	4.76%	21	1	4.76%		Yes	No
H20 - FACULTY	218	3	1.37%	197	3	1.52%	+	Yes	No
H30 - PROFESSIONAL	145	3	2.06%	155	2	1.29%	-	Yes	No
H40 - CLERICAL/SUPPORT	112	0	0.00%	86	0	0.00%		Yes	No
H50 - TECHNICAL/PARAPROFESSIONAL	29	1	3.44%	27	1	3.70%	+	Yes	No
H60 - SKILLED TRADES	13	0	0.00%	11	0	0.00%		Yes	No
H70 - SERVICE/MAINTENANCE	72	0	0.00%	64	0	0.00%		Yes	No
Total	610	8	1.31%	561	7	1.24%			

APPENDIX A – Outreach and Positive Recruitment

Affirmative Action 2017-2018 Good Faith Outreach Efforts

1. Utilize recruitment source with the ***Commercial Appeal*** which distributes employment opportunities nationwide through:
    a. Posts nationwide on monster.com
    b. Posts positions to Military.com
    c. Posts positions to Diversity websites: Interactive One Media, BlackPlanet, MiGente, AsianAve, Career Cast Diversity, DiversityInc, and 50 more websites.
    d. Posts to 30 education-oriented websites through the Education Network
    e. Periodic print ads to increase candidate exposure
    f. Posts positions to AfterCollege network which gives exposure to 192 Academic Departments/Associations/42 Target Schools/44 Majors in Arkansas, 186 Academic Departments/Associations/33 Target Schools/44 Majors in Mississippi, and 348 Academic Departments/Associations/53 Target Schools in Tennessee.
    g. Social Media exposure through targeted banner ads.
2. Run ad in ***Chronicle of Higher Education*** (Global recruiting source specializing in Universities & Colleges).
3. Post positions on ***HigherEdJobs.com*** (Global recruiting source specializing in Universities & Colleges). Also utilize Diversity & Inclusion email blasts with HigherEdJobs.com.
4. Participate in Community Career Fairs.
5. Post jobs openings with Military Installations in the area
6. Partner with Department of Labor to post positions to all registrants/veterans.
7. Participate in Veteran Career Fairs.
8. Post positions on ***Vetjobs.com/HireVeterans.com*** to increase veteran applicants.
9. Post positions on ***Latpro/Latino Memphis/2Trabajo.com*** to increase diversity of applicant pool.
10. Post positions on ***Asian Life/National Association of Asian American Professionals*** to increase diversity of applicant pool.
11. List positions with ***Career Services at Southwest*** TN Community College.

APPENDIX B – Self-Audit

SOUTHWEST TENNESSEE COMMUNITY COLLEGE

The college did not complete a Self-Audit during this Plan Year.

APPENDIX C – Identification of Problem Areas and Action-Oriented Programs

SOUTHWEST TENNESSEE COMMUNITY COLLEGE

There were no areas of underutilization in the Affirmative Action Program. Therefore, no placement goals were set.