

Page 2 **A letter from WOW (Women On Watch).** This 2001 letter was sent to (among others) former Antioch University CEO Bruce Bedford (Bedford is currently the University's Finance Committee Chairman and Treasurer) from WOW (Women On Watch). WOW was a group of tenured and non-tenured faculty, non-union staff, and students formed to respond to CEO Bedford's and Antioch University's apparent lack of concern about potential violations of the College's Affirmative Action policy. In 2001/02 a number of College positions were eliminated as College services were relocated under University authority in a process called consolidation. Some College employees chose to resign rather than be re-assigned to other area under the University's consolidation plan and some College employees were terminated without being offered re-assignment. As these consolidation plans were being developed in late 2001 and implemented in early 2002, the College was without an Affirmative Action Officer.

Excerpts:

In the ongoing absence of an Affirmative Action officer, (as opposed to a committee designed to assist with searches), we have no evidence beyond general statements that Antioch University has incorporated these legal requirements in the proposed restructuring of the college workforce.

Our concerns regarding the equity of the restructuring process are exacerbated by the absence of a trained Affirmative Action officer. It is our hope that the University will not ignore the College's Affirmative Action policy or its Affirmative Action goals in the consolidation process. We bring this to your attention in some part because those persons who have specifically been told that they will be terminated are ALL persons of color, and among those who have been put on notice, at least 4 are persons of color, two identify as GBLT, two are straight while males, and the rest are female.

Pages 3-13 **Antioch College's Affirmative Action Policy - Faculty Personnel and Policy Procedures.** This Affirmation Action Policy is part of the Antioch College Faculty Personnel and Policy Procedures, its contract with Antioch University. It appears that currently there is no Affirmative Action Officer at Antioch College, despite the fact that all 120 employees of the College will be terminated on June 30, 2008. Antioch College Professor Beverly Rogers acted briefly as an Affirmative Action Officer for one meeting several years ago. She is the last known person to have held that position. Professor Rodgers stated that she refused the position of Affirmative Action Officer because no training or compensation was offered for the position.

Excerpts:

This policy shall be manifested in programs including, but not limited to, admissions, employment, promotions, retention, tenure, training and other personnel matters regarding students, staff, administrators, and faculty of the College.

While the responsibility for implementing the Affirmative Action policy is shared among all community members, this section attempts to detail specific responsibilities of certain community members. The President of Antioch College has overall responsibility for implementing College policy, including the Affirmative Action policy.

Thursday, January 31, 2002

To: James Hall, University Chancellor, Glenn Watts, University Vice Chancellor and CFO,
and Bruce Bedford, University Chief Executive Officer
From: Women On Watch (WOW), Antioch College

Gentlemen,

WOW is a group of women representing diverse areas of the Antioch Community. Formed in the Fall of 2001, our membership includes tenured and non-tenured faculty, non-union staff, and students. In the absence of a full-time and/or trained Affirmative Action officer, our primary mission is to assure the integrity of Affirmative Action guidelines and to bring awareness of these issues to the Antioch Community.

With respect to Jim Hall's statement (Adcil, 1/15/02) the "the University will address issues of race, gender and age in a fair and legal manner" in the restructuring process, we are concerned that the proposed cuts affect a disproportionate number of women and persons of color simply by virtue of the salary strata encompassed (middle to lower end salary range).

The purpose of Affirmative Action is to ensure that historically underutilized groups are proportionately represented in the workforce. As is required by federal law, Antioch College's Affirmative Action policy states that "Underutilization is defined as an occupational category in which the minority or female composition in the College's workforce reflects a lower percentage than the workforce of the geographical recruitment area from which it is reasonable to expect applicants."

Restructuring will have a significant impact on non-union staff personnel and positions at Antioch. While there are processes in place to address Faculty and Union concerns (though we challenge their efficacy in the absence of an Affirmative Action officer), we question whether there is a vehicle in place which assures compliance with federal law in the case of the consolidation of these non-faculty, non-union employees.

In the ongoing absence of an Affirmative Action officer, (as opposed to a committee designed to assist with searches), we have no evidence beyond general statements that Antioch University has incorporated these legal requirements in the proposed restructuring of the college workforce.

Our concerns regarding the equity of the restructuring process are exacerbated by the absence of a trained Affirmative Action officer. It is our hope that the University will not ignore the College's Affirmative Action policy or its Affirmative Action goals in the consolidation process. We bring this to your attention in some part because those persons who have specifically been told that they will be terminated are ALL persons of color, and among those who have been put on notice, at least 4 are persons of color, two identify as GBLT, two are straight white males, and the rest are female.

When the restructuring process is completed, the composition of the consolidated workforce will evidence the University's commitment to Affirmative Action law. It is our hope that both the spirit and the letter of the law are respected in this process.

Respectfully Vigilant,
WOW

AFFIRMATIVE ACTION POLICY

I. COMMITMENT TO AFFIRMATIVE ACTION

Antioch College, as an equal employment opportunity employer aggressively practices affirmative action in all its activities. These activities extend to the admission of students, to all educational programs, and to the hiring, promotion and tenure of all employees. Antioch does not discriminate on the basis of race, color, religion, sex, sexual orientation, national origin, age, political affiliation, marital status, or physical handicap. The College commits itself to achieve prompt and full utilization of minorities and women at all levels and in all segments of its workforce where deficiencies exist.

An Affirmative Action Officer, designated by the College, has the responsibility to enforce the affirmative action policy of the College and ensure compliance with all applicable laws and regulations. A committee appointed by AdCil which fairly represents the diverse Antioch Community assists in the implementation of the College's plan and oversees the work of the Affirmative Action officer.

The ultimate responsibility for affirmative action, however, rests with all of the individual members of the Antioch Community who must strive to incorporate the ideals of affirmative action into their daily lives.

Officially re-adopted by ADCIL on Jan. 19, 1984

Antioch College has been, and will continue to be, an equal opportunity employer. The College will continue to recruit, hire, train and promote into all job levels the most qualified persons without regard to race, color, age, sex, religion, national origin, sexual orientation, political affiliation, marital status, disability or veteran status.

This Affirmative Action policy is a set of specific and result-oriented procedures to which Antioch College is committed. Affirmative Action is intended to eliminate the present effects of past underutilization of women and minorities in recruitment, hiring, promotion and other related employment and educational programs and activities operated by Antioch College.

This policy shall be manifested in programs including, but not limited to, admissions, employment, promotions, retention, tenure, training and other personnel matters regarding students, staff, administrators, and faculty of the College.

II. GENERAL POLICY

Central to the policy of the College in matters of employment are two significantly different but complementary principles of non-discrimination and affirmative action. Non-discrimination prohibits the College from using hiring policies and procedures which either intentionally or unintentionally exclude any person or group of persons referred to in the definition of non-discrimination. Affirmative action obligates the College to take steps to encourage qualified women and minority persons to apply for employment.

The intention of the College in applying these two principles is to provide equal employment opportunity for all qualified individuals, and both principles are necessary for the achievement of this goal. For example, it is inadequate insurance against underutilization for the College to be rigorously non-discriminatory in receiving applications for employment if persons of racial and ethnic minority groups do not submit applications. Nor is it complete insurance against underutilization to engage in positive efforts to encourage individuals of minority groups to apply for employment and then fail to provide a culturally sensitive and supportive environment.

The obligation to comply with both principles is concurrent; that is, adherence to one of the principles does not require or permit any violation of the other. An active equal employment opportunity policy incorporating both principles will eventually result in a College community whose composition is a

close reflection of the composition of the available labor force within the normal geographical area of recruitment for each category of employment.

Some general principles will clarify the nature of an affirmative action program:

1. The test which determines the need for affirmative action is not a finding of prior discrimination, but rather the existence of underutilization of women or minorities at any level in the workplace.
2. While a successful affirmative action program should result in definite changes in the composition of the workforce, the measure of compliance with the affirmative action program is not the achievement of a specific numerical result. Rather it is the evidence that "good faith efforts" have been made to diversify the workforce.
3. The major thrust of an affirmative action program is to broaden the pool of applicants for each position to insure that women and minorities will be considered for employment along with all other applicants. The program may not operate to restrict consideration to minorities and/or women only.
4. Standardized employment practices are required to minimize the opportunity for arbitrary or discriminatory hiring decisions. Before recruitment takes place, the persons engaged in hiring are responsible for defining the qualifications of any particular position. These persons are expected to examine closely the qualifications set for each position to verify that the stated qualifications are necessary for successful job performance, and do not exclude certain categories of persons from consideration. The established job requirements are to be made known to all applicants, and the qualifications of all candidates for a position must be evaluated using this same set of job requirements.
5. In adopting this Affirmative Action Plan, the College is making a commitment to greatly intensify its efforts to find and consider for employment and promotion qualified women and members of minority groups where they are presently underutilized.

III. EMPLOYMENT POLICIES AND PRACTICES

A. General Policies and Practices

1. The College shall recruit, select and hire solely on the basis of individual qualifications, without discrimination with respect to race, color, religion, sex, sexual orientation, national origin, age, political affiliation, marital status, disability or veteran status, from an applicant pool which shall be a reflection of the available labor force.
2. Appropriate notices setting forth the College's affirmative action policy shall be posted in the Deans' Offices, and in the Department of Human Resources.
3. In departments with demonstrated underutilization of minorities and/or women within particular job categories, the Affirmative Action Officer and the department shall examine employment procedures and conditions to determine whether the situation may be improved by means of alternative recruitment methods or other personnel policies or conditions.
4. No policy or condition which discriminates against women or any minority group ever shall be tolerated at the College.
5. Employment application, forms and interviewing, shall be applied uniformly to all applicants. The same information and/or skills shall be required from all persons applying for the same job. All personnel having any part in the selection process are chosen with special care and receive ongoing training to ensure that these processes remain nondiscriminatory.

6. Departments shall participate with the Affirmative Action Officer and the Affirmative Action Committee in the setting of goals for their departments.
7. The requirements set forth herein are applicable to all employment positions which become vacant within the College.

B. Recruitment

1. Departments which anticipate authorization to fill positions shall discuss with the Affirmative Action Officer the College's affirmative action policy and what the policy requires in the recruiting process. The department and the Officer shall consider systematic efforts to locate and encourage the candidacy of minorities and women. For faculty searches, refer to the *Faculty Hiring Procedures for Antioch College*.
2. For other staff positions (those using a local pool of applicants): refer to staff and/or Union procedures.
3. Actively encourage minority and female employees to refer applicants.
4. Announcement of all open positions shall be circulated throughout the campus. Such posting shall be regarded as the beginning of the recruiting period.
5. All advertisements, publications, and written inquiries used for recruitment or employment shall contain the statement, "An Equal Opportunity (M/F) Voluntary Affirmative Action Employer," and include minority and female members of the workforce whenever possible in recruiting brochures which pictorially present work situations.
6. During the recruitment period, departments shall assist the Affirmative Action Officer in ascertaining as accurately as possible the race and sex composition of the group of applicants for each position. If the composition of the applicant group does not seem to reflect the estimated availability of women and minorities, the department, the Affirmative Action Officer and Committee shall discuss the possible reasons for the difference, and what, if any, additional steps are needed to complete the recruiting process. The Affirmative Action Officer shall make the final determination if further recruiting efforts are needed.
7. Within three days of the closing date for receiving applications, the Affirmative Action Officer or the Chair of the Search Committee shall prepare the Recruitment and Appointment Activity Record (R&A), evaluating the recruiting effort and the composition of the applicant pool, and making comments and recommendations as appropriate. AdCil or the Department of Human Resources shall take this report into consideration when deciding whether hiring a particular candidate is authorized as a merit-based selection made from the most diverse feasible field of candidates.

C. Selection Procedures

1. Applicants shall be screened and selected solely on the basis of job-related criteria. No part of the affirmative action program shall be construed to require, suggest, or permit the hiring of unqualified applicants in order to diversify the College workforce.
2. Determination of criteria for judging the qualifications of applicants rests with the Department Head, the Search Committee or Human Resources.

D. Record Keeping and Reporting

1. Each department shall maintain written records of the recruitment process for each opening. Records shall be kept for a period of at least five years, and information from these records

shall be made available upon request to the Affirmative Action Officer or the Affirmative Action Committee. Records for each position shall include:

- a. Information on advertising, recruitment letters, telephone calls, networking and other contacts.
 - b. Specific steps taken to recruit minorities or women.
 - c. A summary of applications received.
 - d. Letters of appointment and rejection.
2. The Affirmative Action Officer shall publish in a biennial report a summary of the positions filled during the past two years, a comparison of the composition of the applicant pool and the composition of the available workforce in each case, and the gender and the race/ethnic category of the person who was hired.

E. Promotions

It shall be the policy of the College to promote on the basis of job related criteria (e.g., ability, training, performance, and experience). Demotions, layoffs, recalls and transfers shall also be made on a nondiscriminatory basis. To ensure that minority and female employees have equal opportunity for all promotions the College shall:

1. For faculty:
 - a. Provide a copy of the Faculty Personnel Policies to all newly hired faculty.
 - b. Support newly hired faculty with an orientation program.
 - c. Make mentoring available to all new faculty on a non-discriminatory basis.
2. For other positions:
 - a. Publicize among the staff as stated herein all promotional opportunities and all vacancies.
 - b. Maintain an inventory of the skills, experience and academic level of current minority and female employees.
3. Vacancies above the entry level shall be filled in accordance with existing promotion and transfer policies as contained in the union agreements and existing administrative and faculty procedures.
4. "Worker specifications" are validated based on job performance related criteria.
5. Educational reimbursement and assistance is provided to all unit employees within existing policy.
6. Seniority practices and seniority clauses are reviewed to ensure that such practices or clauses are non-discriminatory and do not have a discriminatory effect.
7. Pregnancy leave shall be granted on a non-discriminatory basis in accordance with the law.

IV. RESPONSIBILITY FOR POLICY AND PROGRAM

While the responsibility for implementing the Affirmative Action policy is shared among all community members, this section attempts to detail specific responsibilities of certain community members. The President of Antioch College has overall responsibility for implementing College policy, including the Affirmative Action policy. The Affirmative Action Officer (currently designated as the Dean of Faculty) shall coordinate on a day-to-day basis the campus-wide implementation of this policy and report to the President. The Affirmative Action Committee assists with and oversees the work of the Affirmative Action Officer. Specific duties are detailed below.

A. Affirmative Action Officer

The duties of the Affirmative Action Officer, working in conjunction with the Affirmative Action Committee, shall include, but not be limited to, the following:

1. Being conversant with laws and regulations of federal, state, and local governments which pertain to equal employment opportunity, non-discrimination, and affirmative action.
2. Developing policy statements, affirmative action plans and methods of communicating about the policy.
3. Identifying and assisting with problem areas, including bringing grievances related to instances of discrimination.
4. Monitoring and reporting regularly to the College community about the effectiveness of the Affirmative Action Policy, including the writing of an biennial report which addresses the following:
 - a. Is there any need for remedial action?
 - b. Are the goals and objectives of the Policy being attained?
 - c. The number of grievances filed.
5. Keeping the President informed about the latest developments in the Affirmative Action area.
6. Ensuring that those who supervise College employees are evaluated on their efforts and results in supporting and implementing the Affirmative Action policy.
7. Serving as a resource for community members who need information about Affirmative Action, or who feel that the policy may have been violated, including a willingness to bring grievances regarding perceived discrimination.

B. Affirmative Action Committee

The Affirmative Action Committee is appointed each year by AdCil and is given the following charge:

To work with the Affirmative Action Officer to review and monitor the College's Affirmative Action policy and procedures. To advocate minority and women's concerns on all levels and in all areas of the College. To better develop the position of women and minorities within the community through education and enhanced interaction.

The specific duties of the Affirmative Action Committee, working in conjunction with the Affirmative Action Officer, shall include, but not be limited to, the following:

1. Studying patterns of employment and underutilization at the College, and considering general affirmative action measures to bring about equal employment opportunity.

2. Reviewing the provisions of the Affirmative Action Plan, including employment goals, and recommending to AdCil changes as appropriate.
3. Working with faculty searches as specified in the Faculty Hiring Procedures.
4. Encouraging and supporting programs and activities which would improve the campus climate and expand opportunities for minority group members and women within the College.
5. The Committee Chair may bring grievances if perceived discrimination has occurred.

C. Department Heads

The responsibilities of Department Heads in the implementation of the Affirmative Action Policy include, but are not limited to, the following:

1. Establishing departmental goals and objectives for hiring and retaining minorities and women.
2. Assisting in the identification of problem areas.
3. Reviewing orientation, mentoring, or training programs and patterns of hiring and promotion to remove impediments to the attainment of goals and objectives.
4. Monitoring qualifications of employees to ensure that minorities and women are given full opportunity for promotion.

V. INTERNAL ASSESSMENT AND MONITORING OF THE AFFIRMATIVE ACTION PROGRAM

As the College engages in a more active Affirmative Action effort, it recognizes the need to establish an adequate system to evaluate the progress of the program. The College shall therefore design, implement and maintain an internal assessment, monitoring and reporting system.

- A. The Department of Human Resources maintains data containing the employment history of all College employees. The file shall serve as part of the College's internal assessment system.
- B. The retrieval system has the capability of producing statistical data as listed below. With such information the College will have a reliable basis for a monitoring system from which reports can be produced.
 1. Workforce composition (race, sex, education, age, length of service, and job title and classification).
 2. Employment activity (promotions, transfers, reclassifications).
 3. Salary and benefits
 4. Utilization of minorities and women.
- C. Every two years the Affirmative Action Officer shall submit a report to the President and the Board of Trustees describing the progress of the Affirmative Action program. The report shall indicate the degree to which employment goals and timetables are being met, and shall include statistical data summarizing the use of the grievance procedure. The biennial reports shall be made public and shall be appended to this Affirmative Action Plan. Interim reports may be issued at the discretion of the Affirmative Action Committee.

On a regular basis (at least every two years) a review of the following personnel matters shall be conducted by:

1. The Affirmative Action Officer shall monitor:
 - a. Composition of the workforce by minority group status and sex.
 - b. Composition of applicant pools by minority group status and sex.
 - c. The hiring process, including such factors as job descriptions, position titles, worker specifications, application forms, interview procedures, test administration, test validity, checking of references, final selection process and similar factors to ensure that:
 - 1) The selection process does not eliminate a significantly higher percentage of minorities or women than non-minorities or men,
 - 2) Job descriptions accurately represent actual functions and duties, and
 - 3) Faculty Hiring Policies and Procedures are being followed for faculty searches
 - d. Promotion and seniority practices
 - e. Apprenticeship, mentoring, and training programs, formal and informal
 - f. Retention patterns.
2. The Affirmative Action Committee shall monitor:
 - a. The general campus climate for minority and women employees.

VI. PUBLICIZING THE AFFIRMATIVE ACTION PROGRAM

In order to insure awareness, understanding, and effective implementation of the Affirmative Action Plan at Antioch College, the following measures shall be taken to inform the College community and others about the general commitment and specific procedures adopted by the College:

- A. The College shall continue to make its Affirmative Action Policy known internally by:
 1. Conducting special meetings at least once a year with faculty, administrators, students, and staff to explain the intent of the policy, the President's attitude toward it, and individual responsibilities for effective implementation. Community meetings, faculty meetings, union meetings, AdCil, and new student orientation shall be used as forums for communicating about the Affirmative Action Policy.
 2. Posting a summary of the policy around campus, including faculty and student mailrooms and staff lounge. Placing full copies of the plan in various locations around campus (the posted summary shall indicate these locations).
 3. Making current employees aware of the existence of the College's affirmative action program and the benefits available to them.
 4. Informing all persons who are involved in hiring new employees of the policy and their responsibilities to implement it.
- B. The College shall continue to disseminate its policy externally by:

1. Informing recruiting sources of College policy and stipulating that these sources actively recruit and refer minorities and women for all positions listed.
2. Informing prospective employees of the existence of the College's policy, and the benefits, if any, which may be available to them under the program.

VII. GRIEVANCE PROCEDURES

It is the intention of the College that all College employees have available a grievance procedure which provides an avenue to file a complaint founded upon alleged discrimination. The College recognizes that the flexibility of informal discussions often result in solutions to employment problems more easily and quickly than do formal procedures. Accordingly, all employees are encouraged to use informal procedures first, and to file a formal complaint should the problem not be resolved satisfactorily.

Formal channels for grievances related to the Affirmative Action policy:

1. Any complaint dealing with tenure or contract renewal of faculty shall be filed under that Faculty Appeal Board procedures as detailed in the Faculty Personnel Policy.
2. Any complaint which is covered by grievance procedures of a collective bargaining agreement shall be filed under those procedures.
3. Any complaint from any other employee shall be filed under the procedures in the University Personnel Policies.
4. Any other complaint from a community member who is not an employee in reference to this policy shall be filed with the Community Standards Board.

VIII. HIRING GOALS AND TIMETABLES

A. Introduction

Constant with generally accepted affirmative action principles, an affirmative action program must include an analysis of the areas in which the employer is deficient in the utilization of minority groups and women and additionally, goals and timetables to which the employer's good faith efforts must be applied to remove the deficiencies and, thus to increase materially the utilization of minorities and women, at all levels and in all segments where deficiencies may be discovered.

1. The primary focus of the utilization analysis for this plan was:
 - a. Determining underutilization; and
 - b. Projecting goals to eliminate the underutilization.

2. The process involved the following steps:

Step 1 - Establishment of Occupational Categories
 Step 2 - Determining Labor Market Availability
 Step 3 - Determining Underutilization
 Step 4 - Goal Setting

STEP 1 - Establishment of Occupational Categories

The format used to establish occupational categories for non-instructional positions was devised by the Equal Employment Opportunity Commission in its E.E.O.-6 Form.

The categories and their definitions are as follows:

Executive/Administrative/Managerial - Includes all persons whose assignments require primary (and major) responsibility for management of the College, or a customarily recognized department or subdivision thereof. Assignments require the performance of work directly related to management policies or general business operations of the College's department or subdivision, etc. It is assumed that assignments in this category customarily and regularly require the incumbent to exercise discretion and independent judgment, and to direct the work of others. In this category are all officers holding such titles as President, Vice President, Dean, Director, or the equivalents, as well as others subordinate to any of these administrators if their principal activity is administrative.

Faculty - Includes all persons whose specific assignments customarily are made for the purpose of conducting instruction, research, or public service as a principal activity (or activities), and who hold academic-rank titles of professor, associate professor, assistant professor, instructor, lecturer, or Librarian I, Librarian II, Librarian III, Librarian IV or the equivalent of any of these academic ranks. Deans, Directors, or the equivalents, as well as Associate Deans, Assistant Deans, and executive officers of academic departments (chairpersons, heads, or the equivalent) are included in this category if their principal activity is instructional. Student teachers or research assistants are not included. The faculty was further reviewed by major areas: Cultural & Interdisciplinary Studies; Natural Sciences; Cooperative Education; Critical Humanities; Library; Literature, Languages & Culture; Physical Education; Self, Culture & Society; Social & Global Studies; and Visual & Performing Arts.

Clerical/Secretarial - Includes all persons whose assignments typically are associated with clerical activities or are specifically of a secretarial nature. Includes personnel who are responsible for internal and external communications, recording and retrieval of data (other than computer programmers) and/or information and other paper work required in an office, such as bookkeepers, stenographers, clerk typists, office-machine operators, statistical clerks, payroll clerks, library clerks, etc.

Technical and Paraprofessionals - Includes all persons whose assignments require specialized knowledge or skills which may be obtained through experience or academic work such as is offered in many 2-year technical institutes, junior colleges or through equivalent on-the-job training. Includes computer programmers and operators, technicians (theater, arts, communications, science), and similar occupational-activity categories, which are institutionally defined as technical assignments. Also includes persons who perform some of the duties of a professional or technician in a supportive role, which usually requires less formal training and/or experience than is normally required for professional or technical status.

Skilled Crafts - Includes all persons whose assignments typically require special manual skills and a thorough and comprehensive knowledge of the processes involved in the work, acquired through on-the-job training and experience or through apprenticeship or other formal training programs.

Service/Maintenance - Includes persons whose assignments require limited degrees of previously acquired skills and knowledge and in which workers perform duties which result in or contribute to the comfort, convenience of personnel and the student body or which contribute to the upkeep and care of buildings, facilities or grounds of the College property. This includes cafeteria workers.

STEP 2 - Determining Labor Market Availability

Our major sources of data for faculty areas were the *1990 Census of Occupational Characteristics U.S. Summary* and the National Research Council's *Summary Report 1993 Doctorate Recipients from United States Universities*.

For executive, administrative and managerial areas the *1990 Dayton-Springfield MSA Occupational Census* was used. For technical, skilled craft and service/maintenance areas the *1990 Dayton-Springfield MSA Occupational Census* was used.

1. Determination of Recruitment Areas

Our first decisions were in regard to recruitment areas for the occupational categories of Executive/Administrative/Managerial, Professional Faculty, Professional Non-faculty, Clerical, Skilled Trades, and Maintenance/Service. It was decided that persons to fill positions under the category of Faculty would be considered to be nationally recruited. Top executive/administrative/managerial positions will also be recruited from the national labor market. Persons filling the jobs under the other categories were considered to be locally recruited. These decisions were based on where we were most likely to recruit potential employees for the various occupational categories.

2. Determining Availability for Faculty Positions

Our major sources of data for faculty areas were the *1990 Census of Occupational Characteristics U.S. Summary* and the National Research Council's *Summary Report 1993 Doctorate Recipients from United States Universities*. If data for the specific classifications were unavailable the nearest general classification was employed. For Cooperative Education, a composite statistic for all academic areas was used. For librarians, the American Library Association's *Academic and Public Librarians: Data by Race, Ethnicity & Sex, 1991* was used.

3. Determining Availability for Executive/Administrative/Managerial

In determining the availability for the Executive/Administrative /Managerial category the *1990 Dayton-Springfield MSA Occupational Census* was used.

4. Determining Availability for Clerical, Skilled Trades, and Service/Maintenance

In determining availability for the Clerical, Skilled Trades, and Service/Maintenance categories, the *1990 Dayton-Springfield MSA Occupational Census* was used because it is more representative of the College workforce for these categories.

STEP 3 - Determining Underutilization

Underutilization is defined as an occupational category in which the minority or female composition in the College's workforce reflects a lower percentage than the workforce of the geographical recruitment area from which it is reasonable to expect applicants.

To determine utilization in each of the occupational categories a comparison was made of the percentage of minorities and women available in the appropriate recruitment area to that of the College's labor force (by individual job groups).

STEP 4 - Goal Setting

Constant with merit-based hiring and equal opportunity policies "Goals may not be rigid and inflexible quotas which must be met, but must be targets reasonably attainable by means of applying every good faith effort to make all aspects of the entire affirmative action program work."

A significant portion of every affirmative action plan is the inclusion of hiring goals and timetables which an institution can reasonably expect to achieve through its affirmative action commitment. As a demonstration of its commitment to the implementation of this document, the College sets goals and timetables periodically.

These goals were developed on the basis of a systematic analysis of the race and gender composition of our current workforce.

Procedures for accomplishing these goals will include: (a) review for revision or elimination of any current procedures or policies that in practice pose employment barriers or allow discrimination to occur after employment; and (b) affirmative steps for the recruitment, employment, and continued involvement

of minorities and women in those categories which have been underutilized within the department or organizational unit.

A department will not be evaluated on the basis of whether goals and timetables are met, but on the extent to which the department exerts concrete good faith efforts to meet the goals and objectives.

Due to the constantly changing nature of faculty positions, it is impossible to accurately project their vacancies for longer than one year. Therefore, the College will submit new goals annually for faculty positions as part of this plan.

All goals will be reviewed biennially to determine the effectiveness of this program. At this time adjustments will be made to the goals to compensate for changes in composition of the College workforce.

It is recognized that the establishment of affirmative action goals is not always necessary or sufficient to eliminate all underutilization and achieve the highest feasible level of diversity. Achievement of hiring goals is not the sole measure of commitment to affirmative action. These goals are guidelines for good faith efforts to open the channels to employment to all persons.

*U.S. Census racial and ethnic categories are rigidly defined by the Office of Management and Budget. The data gathered by Antioch College were based on census categories. This information was then measured against U.S. Census data to determine underutilization. The use of these categories should not be construed as approval or endorsement of racial and ethnic categories as defined by the U.S. Census Bureau.

Approved by ADCIL on May 30, 1995