

SOUTH KITSAP SCHOOL DISTRICT NO. 402

AFFIRMATIVE ACTION PLAN

2009-2014

Adopted by the Board of Directors on March 18, 2009

SOUTH KITSAP SCHOOL DISTRICT NO. 402
Port Orchard, WA 98366

AFFIRMATIVE ACTION PLAN

Introduction

The Board of Directors of the South Kitsap School District recognizes that an affirmative action plan is a sound employment practice that assists in remediating prior employment discrimination and achieving a diverse work force. South Kitsap School District No. 402 commits itself to a policy of equal opportunity for all applicants and employees without discrimination on the basis of gender, race, creed, color, national origin, marital status, religion, sexual orientation, age, veteran status, or physical, mental or sensory disability except as may be necessary to meet a bona fide occupational qualification.

All personnel policies and practices related to employee selection, promotion, retention, staff development, and compensation will conform to this Affirmative Action Plan and the Board of Director's policy on Equal Employment Opportunity, Affirmative Action, and Nondiscrimination.

Adherence to the Affirmative Action Plan is a primary responsibility of the Superintendent, administrators, managers, and supervisors. Every employee will be expected to work toward its success.

Washington school districts are required by regulations issued by the Office of the Superintendent of Public Instruction, WAC 392-200-015, 020, to adopt affirmative action to eliminate discrimination on the basis of sex, race, creed, color, national origin, marital status, age, or the presence of any sensory, mental, or physical handicap. The Washington Law Against Discrimination further prohibits discrimination “because of race, creed, color, national origin, sex, honorably discharged veteran or military status, sexual orientation, or the presence of any sensory, mental, or physical disability or the use of a trained dog guide or service animal by a person with a disability.” RCW 49.60.030. In addition to current policies and educational efforts geared toward eliminating discrimination on all these bases, OSPI requires affirmative action plans to include a workforce “utilization” analysis for two specific groups: women and persons who have been identified as racial or ethnic minorities. This analysis involves comparing the District’s current personnel with the available workforce to determine whether the District may be “under-utilizing” women or minorities in various job categories. At the same time, any activities undertaken to address underutilization must be consistent with RCW 49.60.400 (commonly known as Initiative 200), which prohibits preferential treatment on the basis of race or sex. Thus, if under-utilization is suspected, efforts will necessarily focus on non-discriminatory and non-preferential activities such as maintaining a welcoming work environment, education, recruitment, or other activities consistent with state law.

The format of this Affirmative Action Plan follows the following format, as set forth in OSPI guidance materials:

Section A. Development or Update of Policy

Section B. Methods of Dissemination of Equal Employment Opportunity and Affirmative Action Policy

Section C. Workforce Analysis by Race, Ethnicity, and Sex

Section D. Problem Area Identification

Section E. Goals and Action Steps for Recruitment

Section F. Staff Responsibilities for Implementation, Monitoring and Evaluation of Progress

Section G. Internal Monitoring and Reporting Process

A. Policies

The South Kitsap School District has previously adopted and enforces the following policies with regard to Equal Employment Opportunity and Non-Discrimination in Employment:

Policy No. 5000, Recruitment and Selection of Staff. This policy states that decisions about “hiring, assigning, or transferring staff are based on maximizing the effectiveness of that staff member within the district’s programs and upon the collective bargaining agreements with the respective employee association.”

Policy No. 5010, Equal Opportunity Employment and Affirmative Action. This policy specifically affirms the District’s commitment to equal employment opportunity and to take lawful affirmative steps, where necessary, toward a more diverse workforce.

Policy 5275, Sexual Harassment of or by Employees. Establishes the District’s commitment and specific steps taken by the District to prevent and respond appropriately to workplace harassment of employees.

B. Methods of Policy Dissemination and Communication

1. Internal Communication.

- a. Copies of the District's policies regarding equal employment opportunity, nondiscrimination, and affirmative action are included in the District's published Board policies and corresponding administrative procedures, which are available at all work sites. Board policies are also available online at the District’s website. The grievance procedures available to register complaints under these policies are also included in these policies and procedures.

- b. These policies will also be discussed in new employee orientation meetings.
- c. Copies of the Affirmative Action Plan will be distributed to all members of the Board of Directors, and made available to all administrators, managers and supervisors, to employee representatives, and to any employee via the website and/or upon request.

2. External Communication

- a. Publications from the District's Community Relations Office and/or Personnel Services Office will include notice and mention of the Plan periodically, and at minimum, annually.
- b. A statement of the District's commitment to equal employment opportunity is to be included in all District publications, website, employment announcements, vendor contracts, and other related District documents. All appropriate and interested recruiting sources are to be informed of the District's policies regarding nondiscrimination.
- c. An equal employment opportunity statement will be included on all District job postings and newspaper advertisements.

C. Workforce Analysis

In order to determine whether goals are needed for an affirmative action program, it is first necessary to determine the percentage of females and minorities available in the relevant job market. This is done through an "availability analysis." The availability analysis methodology used herein is based on the guidance provided by OSPI's Employment Affirmative Action Guidelines, as updated for October 2008. The methodology suggested by OSPI relies solely on census data available in the "Census 2000 EEO Data Tool" in order to determine the available workforce for each job category. Based on this guidance, promotable and trainable current employees are not factored into the availability analysis for this Plan. However, the promotion of current employees is one means by which the goals set forth later in this plan may be accomplished.

There are some notable limitations to this analysis. Few, if any, of the job categories reported in census data are an exact match with job categories within the District. For example, none of the census job categories are specific to public school employees (e.g. "teachers" as opposed to "public school teachers"). For the area of certificated administrators (an area of need identified in the 2003 Plan), census 2000 EEO data was available only for the broader job category of "Educational Administrator." This category would also include post-secondary, private, and non-certificated employees. Thus, this analysis must be undertaken with the understanding that no pure, "apples to apples" comparison data is available. Further, both the census data and district employee data relies upon reporting by respondents. Thus, a fairly broad margin for error should be assumed, and this Plan should be considered a good faith effort to identify areas for improvement based on existing data.

With these limitations in mind, the most comparable census data available was gathered for the following categories of District employees:

1. Classified and Certificated Administrators
2. Elementary/Middle School Teachers (K-6)
3. Secondary Teachers
4. Special Education Teachers
5. Certificated Support Staff (Nurse, OT, SLP, School Psychologists, Counselors)
6. Specialists / Other Cert. Support
7. Professional/Technical/Supervisory
8. Teacher Aides
9. Clerical
10. Food Service
11. Custodial & Grounds
12. Maintenance
13. Transportation

Statewide census data were considered for the first six categories of employees. Kitsap County data were considered for categories 7-13 except in a few circumstances where statewide data was deemed more appropriate. Historical recruitment patterns and job-related migration assumptions were considered in determining the appropriate data sources to review for each job category. Although national recruitment has been and will continue to be conducted for many positions, national data were not used for purposes of availability analysis because of the relative infrequency of candidate relocation motivated solely by District employment, as well as the state-specific licensure requirements required for certificated positions.

Many of the above job groups were represented by two or more groups of census data (e.g. Custodial & Grounds corresponded roughly to both the “Janitors” and “Grounds Maintenance” census categories). In such situations applicable availability percentage for each corresponding category was averaged to obtain an availability figure.

Once availability data is gathered, the second step is to measure the District's current utilization (the percentage of females and minorities currently employed in each job group) against the statistically expected utilization rate (80% of the availability rate). If current utilization is lower than the expected utilization, the District is statistically considered to be "underutilized" in a job group.¹ Spreadsheets containing a numerical breakdown of this analysis are included as Appendix B. A discussion of areas where underutilization is indicated is identified in the following section.

D. Problem Areas

Based on the analysis described above, it appears that females are statistically underutilized in the Administrator and Maintenance job groups. Minorities are statistically underutilized in all but the Certificated Support Staff and Clerical job categories.

A discussion of the job categories in which the District is statistically underutilized follows:

Certificated Administrators: Female availability in this job group was calculated at 59.4%; current utilization is 42.6%. Statewide minority availability was 13.3%; current utilization is 5.6%. The District will continue to send vacancy announcements to colleges and universities nationwide, attend career fairs in areas of the state with significant minority populations, develop relationships with career counselors and/or education department staff at colleges and universities with significant minority populations, and explore opportunities to attend career fairs in areas of the country with significant minority populations.

Teachers: The District's utilization of females in teaching positions is above the expected percentage in every single category, including over 80% representation in elementary and special education teachers. The available data also suggest, however, that minorities are significantly under-represented in all District teaching positions. The area of greatest under-representation appears to be in the elementary and middle school (K-6) job category. Notably, although the District has almost the same number of elementary and middle school teachers as high school teachers, minority representation among elementary and middle school teachers is only 4% (nine employees) as compared to 6.6% (15 employees) among secondary school employees. Some of this may be explained by local factors, since the minority availability rate in Kitsap County is only 6.4% (5.1% expected utilization) as compared to the statewide figure of 8.9% availability.

¹The terms "utilization analysis" and "underutilization" appearing in this Affirmative Action Plan are used in the same sense in which these terms are used in regulations promulgated by the federal government relative to such plans for federal contractors. These terms have no independent legal or factual significance, nor should a determination of underutilization be construed as a finding that such underutilization is a result of discrimination by the District. A variety of social, economic, and cultural factors can contribute to under- or over-utilization in a particular workplace. In addition, many statistical comparisons herein involve the use of geographic areas and various sources of statistics. The District has used such geographic areas and statistics in good faith and in an effort to be as useful as possible in the development of the Plan, but the use of this data is intended only for the purpose of implementing this Plan and has no significance outside the context of this Plan.

Statewide data was used across the teaching categories to ensure a consistent data set and in order to reflect recruiting efforts; however, the lower local availability data may be significant because despite statewide and nationwide recruitment efforts by school districts, elementary teaching positions in particular tend to be filled primarily by applicants from the local labor market. At any rate, the available data suggests that some level of under-utilization continues in the District's teaching corps regardless of whether local or statewide data is reviewed. Substitute usage data also suggests that attracting and retaining local minority teachers continues to be a challenge. During 2008-2009, 3.5% of certificated substitutes were minorities, as compared to an estimated 6.4% availability statewide if availability rates for all three categories of teachers are averaged. This is significant because substitute teachers are a common source of new teacher hires. Although, as explained above, availability of current substitutes or trainable employees was not used in calculating availability for this or other categories, the number of substitutes available for hire as full-time teachers is a significant factor in the District's prospects of increasing the diversity of its workforce.

The District will determine appropriate state and local media in which to advertise vacancies, send vacancy announcements to colleges and universities nationwide, develop contacts at colleges and universities with significant minority populations, and explore opportunities to attend career fairs in areas of the country with significant minority populations. The District will review its procedures for recruiting substitute teachers to ensure that the broadest possible pool of applicants are being made aware of opportunities for subbing at the District.

Specialists/Other Certificated Support: Minority availability in this job group was calculated at 8%; current utilization is 2.3%. Some employees in this job group are difficult to recruit because of demand for their positions by private employers. The District will advertise all instructional support positions in local media, send vacancy announcements to colleges and universities nationwide, develop contacts at colleges and universities with significant minority populations, and explore opportunities to attend career fairs in areas of the country with significant minority populations.

Professional/Technical/Supervisory: Minority availability in this job group was calculated at 17.6%; current utilization is 2.8%. Notably, this availability figure represents a significant increase from the data reviewed for the 2003 analysis, which noted an availability rate of 2.5% for this same job group (less than the District's current utilization). It is not clear whether this increase in statistical availability is due to a dramatic increase in minority availability in Kitsap County since the data supporting the 2003 Plan was generated, or some other factor. Notably, census data from multiple job categories needed to be surveyed to determine the average availability for this group, which could increase the statistical margin for error. Regardless, some level of underutilization is likely given the significant difference between calculated availability and utilization.

The District will advertise all professional/technical/supervisory positions in local media, and send vacancy announcements to colleges and universities as appropriate.

Teacher Aides: Minority availability in this job group was calculated at 10.6%; current utilization is 6.8%. The District will advertise vacancies in local media and monitor the hiring process for teacher aides. The District will also seek opportunities to advertise vacancies in local newspapers, at job centers, at local military installations, and with the Employment Security Department.

Food Service: Minority availability in this job group was calculated at 31.2%; current utilization is 4.5%. Recruiting food service employees is difficult because most openings are entry-level positions, which provide 2-3 hours of mid-day work. Further, census-based availability data for some of the positions included in this job category (e.g. “Cooks”) may overstate availability, since private employers of every type would be included in this census category, from fast food restaurants to fine dining. The District will continue to advertise food service vacancies in local media and monitor the food service hiring process. The District will also seek opportunities to advertise vacancies in local newspapers, at job centers, at local military installations, and with the Employment Security Department.

Custodial and Grounds: Minority availability in these job groups was calculated at 22.4%; current utilization is at 12.5%. Within these subgroups, custodial representation is significantly better, at 14.1%, whereas of the seven current Grounds employees none reported minority status. The District will advertise Custodial and Grounds vacancies in local media, send job announcements to local community colleges, at job centers, and at local military installations, and seek other recruitment opportunities as may be available.

Maintenance: Countywide female availability in this job group is 1%; current utilization is 0%. Minority availability in this job group is 8.6%; current utilization is 2.5%. Notably, according to census data the 1% female availability reported corresponds to four total female employees in all of Kitsap County. In addition, there are limited position openings in Maintenance. When openings occur, the District will advertise the vacancies in local media, send job announcements to local community colleges, trade schools, apprenticeship programs, at job centers, and at local military installations, and seek recruitment opportunities at local trade schools and apprenticeship programs.

Transportation: Minority availability of bus drivers in Kitsap County is reported at 8.6%; current utilization is at 2.5%. Recruitment of bus drivers is challenging as there is a high demand among school districts for qualified drivers, and recruitment beyond the local labor market is not feasible due to the nature of the position. Further, the only available census data for Kitsap County appears to include all “bus drivers” in this job category, which is likely to include private and transit drivers and therefore likely overstates the number of available persons qualified and licensed to transport students for a public school district. The District will continue to advertise vacancies for substitute and permanent driver positions in local media, as well as posting in other areas where qualified individuals may be recruited.

In general, the data indicates a slight decrease in minority representation in several job categories, while in others, minority representation increased but reported availability has also increased. One of the challenges the District has faced, and will continue to face in this regard, is that the District's workforce has been shrinking, not expanding, over recent years, so there have been, and will continue to be, very few opportunities to improve diversity through new hires. In addition, because of collective bargaining obligations, any layoffs must be made based on seniority, so to the extent increased minority representation occurs as the result of new efforts, some of that diversity may be lost when force reductions occur.

In its 2009 annual update, the District will discuss and analyze the reasons for any continuing underutilization of females and minorities in each of its job groups

E. Goals and Action Steps for Recruitment

Based on the data gathered, the District's goals are to ensure that optimal conditions exist for the following statistically expected increases in female and minority representation to occur:

- Increased minority representation throughout all facets of the District's workforce;
- Increased female representation in certificated and classified administrator positions.

Given that the current classified administrator positions are exactly 50% male and 50% female, an increase in female certificated administrators is statistically expected. This goal is deemed to be particularly appropriate and realistic given that school principals and assistant principals are often promoted from teaching positions, and women are currently over-represented (statistically speaking) in every teaching category.²

In addition to the specific steps discussed in Section D for each specific job category, the District will review application screening processes and revise them as necessary to ensure that job-related criteria are considered in selecting interviewees for all job categories. All District employees involved in interviewing job applicants will be trained in proper interviewing techniques, advised of District hiring policies, and informed of the District's commitment to its Affirmative Action Plan. Before making any job offer, the Personnel Services Office will review the applicant pool, candidate selection and interview processes, and hiring team records to ensure compliance with District hiring policies. The District will review retention rates of current protected-class employees, and look for ways to include its mentoring program to further support current minority employees.

²Although males are under-represented in many categories, this Plan does not contain a goal of increasing male representation, primarily because legal requirements and guidance from OSPI mandate a specific focus on only two categories of employees: females and minorities. However, it is noted that such a goal may be appropriate eventually in order to ensure a truly diverse workforce and a balanced educational experience for District students.

To facilitate attainment of affirmative action goals, the Personnel Services Office has responsibility for implementing and/or monitoring the following supportive activities:

1. Job Descriptions

Job descriptions will be reviewed and revised as necessary to reflect current duties, essential job functions, and critical job elements.
2. Recruitment
 - a. Recruitment sources and procedures will ensure that qualified protected-class applicants are identified and recruited.
 - b. Targeted mailing lists, newspaper advertisements, career fair participation, school-focused recruiting, and active participation with other public agencies on diversity and affirmative action issues will be used to increase the diversity of the applicant pool.
 - c. A computerized applicant tracking system has been implemented and will be utilized to evaluate the effectiveness of the District's recruiting efforts and to identify the best sources of protected-class applicants.
3. Employee Selection.
 - a. Selection instruments and methods will be based on essential job functions and critical job elements.
 - b. As vacancies occur, recruiting and hiring authorities will be reminded of the District's commitments under the Affirmative Action Plan.
 - c. The Personnel Services Office will monitor all aspects of the employee selection process for inclusion of underutilized protected-class applicants.
4. Orientation. All new employees receive an orientation. This program includes a general orientation to the District and a discussion of pertinent District policies, including equal employment opportunity and affirmative action.
5. Evaluation.
 - a. All employees are evaluated annually using processes and criteria appropriate to each position.
 - b. Career counseling is available through the employee's supervisor or the Personnel Services Office. The District may also use mentors to assist in career counseling.

6. Program Support. The Personnel Services Office will train and assist administrators, managers, and supervisors in developing appropriate departmental and building strategies to implement the District's Affirmative Action Plan.
7. Complaint Procedure. A formal complaint procedure has been adopted by the District and is attached as an Appendix to this document.

F. Staff Responsibility for Implementation and Evaluation

1. Affirmative Action Officer

The Affirmative Action Officer has responsibility for reporting to the Superintendent and Board of Directors. The Affirmative Action Officer is:

Lori McStay, Director of Personnel
South Kitsap School District No. 402
1962 Hoover Avenue SE
Port Orchard, WA 98366
(360) 874-7000
(360) 874-7076 Fax

The Affirmative Action Officer is also charged with responding to any questions or complaints concerning Title IX of the Civil Rights Act, and other employment discrimination laws except as noted below.

2. Other Officers

Greg Roberts, Assistant Superintendent for Personnel and Labor Relations, is responsible for responding to any questions or complaints concerning the Americans with Disabilities Act.

Dr. Albert Pack, Assistant Director of Special Education, is responsible for responding to any questions or complaints regarding Section 504 of the Rehabilitation Act of 1973.

The preceding individuals can be contacted at:

South Kitsap School District No. 402
1962 Hoover Avenue SE
Port Orchard, WA 98366
(360) 874-7000
(360) 874-7675 Fax

3. **Personnel Services Office**

The overall responsibility for monitoring and auditing this Plan shall be by the District's Personnel Services Office. This Office can be contacted through:

Greg Roberts,
Assistant Superintendent for Personnel & Labor Relations
South Kitsap School District No. 402
1962 Hoover Avenue SE
Port Orchard, WA 98366
(360) 874-7000
(360) 874-7076 Fax

4. **All Employees**

All employees of the District are responsible for supporting this Plan and for conducting their duties in accordance with it. Anyone having questions or concerns about any matter related to equal employment issues is encouraged to contact the Personnel Services Office, the Affirmative Action Officer, or the other officers identified above as appropriate.

G. Internal Audit and Reporting

The District has established the following internal audit and reporting system to monitor the Affirmative Action Plan:

1. Job History Files. Job history files are maintained and retained for the legally specified time period and are available for reference. These files contain copies of the job announcement, applicant lists, applications, selection instruments, rating summaries, and relevant correspondence and notes.
2. Applicant Flow Data. All applicants are asked to fill out an optional self-designation form, and are asked to indicate how they found out about the position for which they are applying. A computerized applicant tracking system has been implemented and will be utilized.
3. Reporting. Statistics on recruiting and utilization will be prepared and reviewed with administrators, managers and supervisors as appropriate.
4. Data Integrity. Because the District relies on employee self-reporting for affirmative action data, under-reporting could result in erroneous or exaggerated underutilization figures. The District will review its procedures for gathering data from applicants and employees to determine whether appropriate means may exist to encourage accurate reporting while respecting employees' rights and privacy.

APPENDIX A: EEO COMPLAINT PROCEDURE

These procedures have been developed for the resolution of equal employment opportunity and equal access complaints against the South Kitsap School District and its employees. To ensure fairness and consistency, they are to be used to address grievances covered by state and federal equal employment laws, including the Americans with Disabilities Act (ADA), the Age Discrimination in Employment Act, Titles VII and IX of the Civil Rights Act, the Washington Law Against Discrimination, and/or the District's Affirmative Action Plan. No person shall be adversely affected in any way because of the utilization of these procedures. The Assistant Superintendent for Personnel and Labor Relations or a designee shall investigate all allegations of noncompliance or discrimination.

Procedure

LEVEL I: Informal Resolution

With regard to ADA matters, a distinction is made between a request for accommodation and a grievance. A request for accommodation should be submitted to the Assistant Superintendent for Personnel and Labor Relations. The parties should cooperate to resolve any issues of accommodation through an interactive process prior to implementing the formal procedures outlined in Level II. A grievance is to be filed only in the event there is a complaint of noncompliance after a request for accommodation has been made.

An employee may complain informally to his or her supervisor, the Affirmative Action Officer, or the Assistant Superintendent for Personnel and Labor Relations about any alleged noncompliance with equal employment opportunity or equal access laws. The Assistant Superintendent for Personnel and Labor Relations or a designee will attempt informally to resolve the complaint and shall notify the complainant within thirty (30) days of a proposed resolution.

LEVEL II: Formal Complaints

If the employee chooses not to follow the informal resolution process or is not satisfied with the proposed resolution, the employee may file a formal grievance.

A. Grievances shall:

1. be in writing.
2. be signed by the grievant.
3. set forth specific acts, conditions or circumstances alleged to be in violation of the District's obligations in regard to discrimination, accessibility, and/or accommodation.

4. be filed with the Assistant Superintendent for Personnel and Labor Relations as soon as possible, but no later than thirty (30) days following the alleged discrimination or harassment.
- B. Upon receipt of a grievance, the Assistant Superintendent for Personnel and Labor Relations or a designee shall investigate the allegations set forth and shall coordinate reasonable procedures to effect a prompt resolution of the grievance.
- C. If a resolution is reached, the Assistant Superintendent for Personnel and Labor Relations will write a formal memorandum of agreement, to be signed by all affected parties.
- D. Upon completion of the investigation, the Assistant Superintendent for Personnel and Labor Relations will provide the Superintendent with a full written report of the results of the investigation, unless the matter is resolved to the satisfaction of the grievant prior to the submission of a full written report.
- E. In cases where no mutually agreed upon resolution is reached, the Superintendent will respond in writing to the grievant within thirty (30) days following receipt of the written grievance.
- F. The response of the Superintendent shall state either: (1) that the District denies the allegations contained in the grievance, or (2) the nature of such reasonable corrective measures deemed necessary to eliminate any such act, condition, or circumstance within the District.
- G. Corrective measures deemed necessary shall be instituted as expeditiously as possible, but in no event later than thirty (30) days following the Superintendent's mailing of a written response to the grievant.

LEVEL III: Appeal to the Board of Directors

- A. In the event a grievant remains aggrieved following a written response from the Superintendent, the grievant may appeal to the District's Board of Directors by filing a written notice of appeal with the Secretary of the School Board on or before the tenth (10th) day following: (1) the date upon which the complainant received the Superintendent's written response, or (2) the expiration of the thirty (30) day response period in Section II.E. above, whichever occurs first.
- B. Upon receipt of the appeal, the Board of Directors shall schedule a hearing to commence on or before the twentieth (20th) day following the filing of a written notice of appeal.
 1. Both parties shall be allowed to present such witnesses and testimony as the Board of Directors deems relevant and material.
 2. The Board of Directors shall render a written decision on or before the tenth (10th) day following the termination of the hearing and shall provide a copy to all parties involved.

LEVEL IV: Appeal to the Superintendent of Public Instruction

In the event a grievant charging sex discrimination in violation of Chapter 28A.640 RCW or Chapter 392-190 WAC remains aggrieved with the decision of the Board of Directors, the grievant may appeal the Board's decision to the Superintendent of Public Instruction (SPI).

- A. A written notice of appeal must be received by the SPI on or before the tenth (10th) day following the date upon which the grievant received written notice of the Board of Directors' decision.
- B. A written notice of appeal must set forth:
 - 1. a concise statement of the original grievance and the portions of the Board of Directors' decision being appealed, and
 - 2. the suggested recommendations for resolution or remediation of the alleged grievance set forth in the original statement of complaint.

The grievance procedure outlined above does not prohibit the processing of grievances by an employee pursuant to grievance procedures established in applicable collective bargaining agreements.

APPENDIX B: AVAILABILITY AND UTILIZATION DATA

- 1. 2008-2009 Utilization Analysis (Women)**
- 2. 2008-2009 Utilization Analysis (Minorities)**
- 3. Prof-Tech-Sup Worksheet**
- 4. ESA Worksheet**