



NORTH THURSTON PUBLIC SCHOOLS

AFFIRMATIVE ACTION PLAN



2023 - 2028

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AFFIRMATIVE ACTION PLAN

I. PURPOSE

North Thurston Public Schools is committed to non-discrimination and to an Affirmative Action Plan. The District also recognizes that equal employment opportunity is an indicator of excellence in education. It is our belief that all employment practices must be administered to enhance fair and equal treatment without regard to race, creed, religion, color, national origin, age, sex, sexual orientation, veteran or military status, marital status, genetic information or non-job-related physical, sensory, or mental disability, except insofar as such factors are valid occupational qualifications. We are committed to employing individuals who represent the diverse talents, contributions, abilities, and experiences of our society.

The Affirmative Action Plan is intended to be a comprehensive effort by the District to set goals to hire members of protected classes in all employment areas; to identify any barriers in the human resources management system which may limit the ability of applicants and employees to reach their full potential, and to analyze the effectiveness of the District's efforts in this area.

To ensure the effectiveness of this plan, ongoing revision is necessary. Every three years, progress will be reviewed, and new goals will be identified and revised as necessary.

II. DISSEMINATION OF POLICY AND PLAN

It is the responsibility of the superintendent of the North Thurston School District, or a designee, to inform all applicants for employment, all current employees, all persons responsible for hiring, within the District, all employee associations, and all District contractors and subcontractors of its commitment to equal opportunity employment. Every three years, progress will be reviewed, and new goals will be identified and revised as necessary.

A. Internal Communication

- Inform administrators of goals and strategies in the Affirmative Action Plan, including responsibilities for effective implementation, demonstrating the Board's and Superintendent's commitment.
- Post the policy of equal employment opportunity and federal and state posters prohibiting discrimination on bulletin boards in the Human Resources Office and other building sites.
- Publicize the District's equal employment policy periodically in publications of the Communications Office.
- Maintain the District's Affirmative Action Plan in compliance with all employee organizations. Any negotiated agreements must not contain any statements that interfere with this policy.
- Document compliance with personnel practices, through the Human Resources Department, including a statistical analysis and update of employment data to measure the effectiveness of the Plan completed every three years.
- Maintain record systems that will collect, recall, and display aggregate data on District employees with respect to race and gender.

- Continually review all job descriptions and job postings to ensure accuracy and to remove non-job-related barriers to employment.
- Review all Affirmative Action goals relating to equal employment opportunity and review progress towards those goals with the Board of Directors.
- Include the District’s non-discrimination policy in all employment handbooks.
- Post the Affirmative Action Plan on the District’s website.

B. External Communication

- On all recruitment and application materials, as well as job postings, include the equal employment policy statement.
- To the extent possible, identify persons with the prerequisite skills and abilities for projected openings throughout the District.
- Notify all subcontractors, vendors, and suppliers in writing of our equal employment policy statement as appropriate.

C. Internal and External Communication

A link to the 2023 – 2028 Affirmative Action Plan will be distributed to all pertinent organizations, agencies, and people within and outside the District as follows:

- Board of Directors
- All administrators and supervisors
- Posted on the Employee Intranet
- The President of all employee associations
- Any employee, upon request

III. RESPONSIBILITY FOR IMPLEMENTATION AND EVALUATION

The Superintendent has overall responsibility for developing, implementing, coordinating, and monitoring the Affirmative Action Plan. The District’s Affirmative Action Officer is the Executive Director of Human Resources, Sean Dotson (sdotson@nthurston.k12.wa.us), who is responsible for assuring that the North Thurston School District is meeting its obligations. The Affirmative Action Officer is also charged with making known the District’s desire and commitment to employ members of protected classes.

The Affirmative Action Officer is responsible for overall coordination within the District. The Affirmative Action Officer will advise the Superintendent or the Board on equal opportunity matters as required. The officer will review the plan yearly to:

- Ensure equal opportunity throughout the District
- Monitor progress toward the goals
- Evaluate the plan’s accomplishments
- Prepare memoranda to specify responsibilities as required by this plan

IV. UTILIZATION ANALYSIS

A. Development of Analysis

The 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. These terms have no independent legal or factual significance whatsoever. Many statistical comparisons herein involve the use of geographic areas and various sources of statistics. The use of such geographic areas and statistics is intended only for the purpose of implementing this Affirmative Action Plan and has no significance outside the context of this Plan, although these statistics and areas have been selected and used in good faith and to be as useful as possible in the development of the Plan.

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, Census 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. Similar overlap and inconsistencies between census and District job categories exist throughout this analysis. 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 rely upon reporting by respondents. Thus, a 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.

To determine whether goals are needed for an Affirmative Action Plan, it is first necessary to decide the percentage of females and people of color available in the workforce. This is done through an “availability analysis.” The availability analysis used here is the one outlined in federal regulations for affirmative action. Currently, three factors are primarily used to determine availability:

- Persons having requisite skills in the immediate labor area.
- Persons having requisite skills in the area in which the District can reasonably recruit.
- Promotable and transferable persons in the District's workforce and degree of training the District can reasonably undertake.

The second step is to measure the District’s current utilization (the percentage of females and people of color currently employed in each job group) against the statistically expected utilization rate (80% of availability rate). If current utilization is lower than the expected utilization, the District is “under-utilized” in a job group.

The eleven groups identified for tracking are Certificated Administrators, Elementary Teachers, Secondary Teachers, Instructional Support, Professional/Technical/Supervisory, Paraeducators, Office Clerical, Food Service, Custodial, Maintenance, and Transportation.

After determining the job groups and number of employees in each group, availability factors applicable to each job group were identified. Each factor was weighted, and a final availability statistic was calculated. Each job group is statistically analyzed for both female and BIPOC (Black, Indigenous, People of Color) utilization.

The data used to calculate each factor came from several sources, including the 2020 census data for the Olympia Metropolitan Statistical Area (OMSA) encompassing Thurston County, 2020 Washington State census data (Equal Employment Opportunity File), United States Census Bureau EEO Data Tool, and internal District data regarding promotion patterns and substitute employee pools. Progress can be monitored from the summary of underutilization analysis provided in a prior year.

B. Analysis of Under-Utilization

The District has analyzed its 2022-2023 utilization of females and people of color relative to availability. See Appendices A and B.

Over the past several years, The District's primary focus has been on retaining and hiring BIPOC staff at all levels within our schools and District office. Special attention has been given to increasing the representation of BIPOC educators and administrators. Since 2017, the percentage of BIPOC certificated administrators has increased from 6.9% to 16.4%; the percentage of BIPOC elementary teachers has increased from 9% to 11.6%; the percentage of BIPOC secondary teachers has increased from 10.4% to 15.1%. The District will continue to prioritize increasing BIPOC staff representation to narrow the gap between the demographics of NTPS staff compared to NTPS students.

The analysis indicates that females are statistically under-utilized in the Custodial and Maintenance groups. People of color are statistically under-utilized in the Transportation and Professional/Technical/Supervisory groups.

A discussion of the job groups follows:

1. **Certificated Administrators.** Expected BIPOC utilization in this category is 9.1%. Current utilization is 16.4%, exceeding availability. BIPOC utilization in this job group increased by 9.5% over the past five years due to the District's significant efforts to promote progress in increasing BIPOC representation in its certificated administrator ranks. Expected female utilization in this category is 39.8%. Current utilization is 57.4%, also far exceeding availability. Although no goals are necessary with this job group, the District will continue its recruiting outreach efforts.
2. **Elementary Teachers.** Expected BIPOC utilization in this category is 5.2%. Current utilization is 11.9%, exceeding expected utilization (9.0% utilization in 2017). Although no goals are necessary with this job group, the District will continue its recruiting outreach efforts. Expected female utilization in this category is 58.5%. Current utilization is 87.9%, far exceeding availability.
3. **Secondary Teachers.** Expected BIPOC utilization in this category is 6.23%. Current utilization is 14.3%, far exceeding availability (10.4% utilization in 2017). Although no goals are necessary with this job group, the District will continue its recruiting outreach efforts. Expected female utilization in this category is 44.6%. Current utilization is 68.9%, so no goals are necessary in this area.
4. **Instructional Support.** Expected BIPOC utilization in this category is 8.6%. Current utilization is 11.5%, exceeding expected utilization. Although no goals are necessary with this job group, the District will continue its recruiting outreach efforts. This job group includes physical therapists, speech language pathologists, registered nurses and occupation therapists. To maintain the utilization rate, the District will continue to focus on communicating and building relationships with university placement coordinators, attract student interns, and hire interns into hard-to-fill positions. Expected female utilization in this category is 60.9%. Current utilization is 69.2%, exceeding availability.

5. Professional/Technical/Supervisory. This job group includes database and network administrators, media and communication workers, human resources workers, and other managers. Current utilization is 4.9%, below the expected BIPOC utilization of 14.4% for this category. Expected female utilization in this category is 41.7%. Current utilization is 52.4%, so no goals are necessary in this area. Although no goals are necessary with this job group for females, the District will continue its recruiting outreach efforts and interview as broad an applicant pool as practicable.
6. Paraeducators. Expected BIPOC utilization in this category is 17.8%. Current utilization is 25.9%, exceeding expected utilization. Although no goals are necessary with this job group, the District will continue its recruiting outreach efforts. The District will review job announcements with diversity and cultural awareness in mind to continue its efforts to attract a more diverse pool of candidates and ensure qualified BIPOC applicants are fully considered. Expected female utilization in this category is 72%. Current utilization is 85.6%, exceeding availability.
7. Office Clerical. Expected BIPOC utilization in this category is 10.5%. Current utilization is 16.4%. Expected female utilization in this category is 77.3%. Current utilization is 98.2%, far exceeding availability.
8. Food Services. The expected BIPOC utilization in this category is 21.1%. Current utilization is 41.2%, exceeding expected utilization. Although no overall goals are necessary with this job group, the District will continue its recruiting outreach efforts. Expected female utilization in this category is 77.3%. Current utilization in this category is 97.6%, far exceeding availability.
9. Custodial. Expected BIPOC utilization in this category is 22.9%. Current utilization is 33.8%, exceeding availability. Female availability in this category is 36.9%. Current utilization is 21.2%, missing the mark by 15.7% in this area.
10. Maintenance. Expected BIPOC utilization in this category is 25.2%. Current utilization is 26.9%, meeting expected utilization. Expected female utilization in this category is 8.8%. Current utilization is 3.6%, missing the mark by 5.2%. Add goal for this category. The District will continue its recruiting outreach efforts as positions become available to identify and attract qualified BIPOC and female applicants for the limited vacancies anticipated during the life of the plan.
11. Transportation. Expected BIPOC utilization in this category is 17.8%. Current utilization is 14.6%, 3.2% below the expected utilization. Recruiting within this occupational category poses challenges, primarily due to the requirement for new hires to undergo several weeks of training at minimum wage while initially working as on-call substitute drivers with limited hours. To address this, the District will actively review job announcements with a focus on diversity and cultural awareness, striving to attract a broader range of candidates that represent diverse backgrounds. To ensure equal consideration, the District will closely monitor applicant flow data and take steps to ensure that qualified BIPOC applicants receive interviews with the department. Female availability in this category is 39.4%. Current utilization is 57.3%, so no goals are necessary in this area.

V. GOALS AND TIMETABLES

The District shall establish goals for increasing the representation of females and people of color in each of the job groups where under-representation exists, as shown in Appendices A and B, to be achieved by the end of the 2028 school year.

- **Professional/Technical/Supervisory:** BIPOC professional/technical/supervisory availability is 14.4% and the District's current utilization is 4.9%, reflecting an underutilization of 9.5%. The District goal is to reduce this underutilization to under 5% by 2028.

- **Transportation:** BIPOC transportation availability is at 17.8% and the District’s utilization is 14.6%, reflecting an underutilization of 3.2%. The District goal is to reduce underutilization to under 1.5% by 2028.
- **Custodial:** Availability of female custodial staff is 33.8% and the District’s current utilization is 21.2%, reflecting an underutilization of 12.6%. The District goal is to reduce underutilization to under 10% by 2028.
- **Maintenance:** Availability of female maintenance staff is 8.8% and the District’s current utilization is 3.6%, reflecting an underutilization of 5.2%. The District goal is to reduce underutilization to under 3% by 2028.

In addition to the specific steps discussed in Section B for each specific job category, the District will commit to:

- Ensure that recruiting, hiring, and retention efforts are in alignment with the strategic plan.
- Review application screening processes and revise them as necessary to ensure that job-related criteria are considered in selecting interviewees for all job categories.
- Ensure that 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 nondiscrimination.
- Confirm that the Human Resources Department reviews the applicant pool, candidate selection and interview processes, and hiring team records to ensure compliance with District hiring policies before making any job offer.
- Review retention rates of current protected-class employees and look for ways its mentoring program can further support current BIPOC employees.

The following processes will be used to assist the District in meeting these goals. Analysis of the goals occur every three years, and results will be given to the Board of Directors. Periodic training to administrators on diversity hiring practices will be conducted. The Human Resources staff will work to increase the applicant pool through attendance at hiring fairs, college/university recruiting visits and other community agencies.

VI. INTERNAL AUDITING AND MONITORING

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

- Job History Files. Job history files are maintained and retained for the legally specified period and are available for reference. These files contain copies of the job announcement, applicant lists, applications, copies of selection instruments, rating summaries, and relevant correspondence and notes.
- Applicant Flow Data. All applicants are asked to fill out an optional self- designation form. A computerized applicant tracking system is utilized.
- Reporting. Statistics on recruiting and utilization will be prepared and disseminated to administrators, managers, and supervisors as appropriate.

The Affirmative Action Officer will evaluate the effectiveness of the Plan and recommend changes to the superintendent. Changes will be carried out under the direction of the Executive Director of Human Resources.

VII. SUPPORTIVE SYSTEMS

A. Job Structuring for Promotion

The Affirmative Action Plan shall ensure that the public will have an opportunity to enter public school service in the North Thurston School District based on open competition and to advance according to their relative abilities.

This is to be accomplished by routinely analyzing position requirements to ensure that they are necessary, by making selections for positions based upon required qualifications, and by providing opportunities for upward mobility. To achieve this goal, the following activities will be implemented annually unless otherwise noted:

1. A careful review will continue to be made of all job descriptions to remove non-job-related requirements for employment or advancement.
2. Job descriptions will be reviewed regularly to assure that qualifications required will be minimum for entrance into a given job classification rather than a desired standard attainable only after some experience on the job.
3. Job qualifications will be analyzed to provide for an emphasis on potential for development rather than present performance capabilities.
4. Promotional possibilities will be identified wherever possible to permit movement of capable lower-level employees to positions of greater responsibilities as employees develop.
5. Employees in all departments will be given assistance in the form of counseling and training.
6. The North Thurston Intranet will announce in-service training opportunities for all employees on a regular basis.

B. Recruitment, Employment and Training

The District is an Equal Employment Opportunity/Affirmative Action Employer. It is our policy and commitment to provide equal employment opportunity and non-discriminatory treatment in recruitment, hiring, retention, transfer, promotion, and training of all employees regardless of age, genetic information, national origin, race, color, creed, religion, sex, sexual orientation, marital status, non-job-related physical, sensory, or mental disability, or veteran or military status, except insofar as such factors are valid occupational qualifications.

Consistent with the Affirmative Action Plan, appropriate departments of the District will work to accomplish the following goals:

1. All new employees will receive an orientation. This program includes a general orientation to the District and a discussion of pertinent District policies, including equal employment opportunity.
2. Send announcements regarding job openings to local agencies, institutions, and professional groups to assist in the recruitment of members of protected classes.
3. Utilize an online applicant tracking system to evaluate the effectiveness of recruiting efforts and to identify the best source of protected-class applicants.
4. Post all job openings on the District website.
5. Make college placement offices aware of the District's commitment to an equal employment opportunity policy and its Affirmative Action Plan to implement this

policy.

6. Continue to develop various in-service training opportunities by which personnel can receive assistance in moving from beginning levels to positions of greater responsibility.
7. Provide interview training to school hiring committees to help them be more aware of the impact cultural differences may have on the hiring process.
8. Provide training, troubleshooting and accountability as needed for colleagues and staff who provide support to new protected class employees.
9. Develop key partnerships with our local universities (i.e., Central Washington University, Saint Martin's University) to assist current employees and students who aspire to become teachers. The District has also partnered with Washington Governor's University and ESD 112 in providing alternative routes to certification that allows for current paraeducators who hold an AA degree to enroll in one of two dual endorsement programs to obtain certification on an alternative track while continuing to work in their current assignment with students. The District's partnership with Central Washington University will provide for a Teacher Academy to 'Grow our Own' teachers. This will be available to high school students through our Career and Technical Education department. This program will support our current students who seek teaching as a profession, offering them support throughout their program to include work as a paraeducator in the District. Once their degree and certification program are complete, they would be eligible for employment. The District will reach out to all students with a focus on BIPOC students in promoting this program.

C. Complaint Procedure

To ensure fairness and consistency, the following review procedures are to be used in the District's relationship with its staff regarding employment problems covered by state and federal equal employment opportunity laws and/or this Affirmative Action Plan. No employee's status with the District shall be adversely affected in any way because the employee utilized these procedures.

Informal Review Procedure

Prior to implementing the formal procedure, as outlined in Level One, an employee may complain informally to their supervisor, the Title IX Compliance Officer, or the Human Resources Department about alleged noncompliance with equal employment opportunity or equal access laws. The Title IX Compliance Officer or designee will attempt to informally resolve the complaint and shall notify the complainant within thirty (30) days of a proposed resolution.

Level One – Complaint to District

The written complaint must set forth the specific acts, conditions, or circumstances alleged to be in violation.

- a. Upon receipt of a complaint, the compliance officer will provide the complainant a copy of this procedure.
- b. The compliance officer will investigate the allegations within 30 calendar days. The school district and complainant may agree to resolve the complaint in lieu of an investigation.

- c. The officer will provide the Superintendent a full written report of the complaint and the results of the investigation.
- d. The superintendent or designee will respond to the complainant with a written decision as expeditiously as possible, but in no event later than 30 calendar days following receipt of the written complaint, unless otherwise agreed to by the complainant or if exceptional circumstances related to the complaint require an extension of the time limit. In the event an extension is needed, the district will notify the complainant in writing of the reason for the extension and the anticipated response date. When the district responds to the complainant, it must send a copy of the response to the office of the superintendent of public instruction.
- e. The decision of the superintendent or designee will include:
 - 1. a summary of the results of the investigation;
 - 2. whether the district has failed to comply with anti-discrimination laws;
 - 3. if non-compliance is found, corrective measures the district deems necessary to correct it; and
 - 4. notice of the complainant's right to appeal to the school board and the necessary filing information. The superintendent's or designee's response will be provided in a language the complainant can understand and may require language assistance for complainants with limited English proficiency in accordance with Title VI of the Civil Rights Act of 1964.
- f. Any corrective measures deemed necessary will be instituted as expeditiously as possible, but in no event later than 30 calendar days following the superintendent's mailing of a written response to the complaining party unless otherwise agreed to by the complainant.

Level Two – Appeal to Board of Directors

- a. If a complainant disagrees with the Superintendent's or designee's written decision, the complainant may appeal to the Board of Directors by filing a written notice of appeal with the secretary of the School Board on or before the tenth (10th) calendar day following the date upon which the complainant received the written response,
- b. The Board of Directors will schedule a hearing to commence by the twentieth (20th) calendar day following the filing of the written notice of appeal unless otherwise agreed to by the complainant and the Superintendent or for good cause:
 - 1. Both parties will be allowed to present such witnesses and testimony as the Board deems relevant and material. The Board hearing will be public unless a confidential hearing is requested by the complainant.
 - 2. Unless otherwise agreed to by the complainant, the Board of Directors will render a written decision within thirty (30) calendar days following the filing of the notice of appeal and provide the complainant with a copy of the decision.

Level Three – Appeal to the Superintendent of Public Instruction

If a complainant disagrees with the decision of the Board of Directors, or if the District fails to comply with this procedure, the complainant may file a complaint with the Superintendent of Public Instruction.

- a. A complaint must be received by the Superintendent of Public Instruction on

or before the twentieth (20th) calendar day following the date upon which the complainant received written notice of the Board of Directors' decision, unless the Superintendent of Public Instruction grants an extension for good cause. Complaints may be submitted by mail, fax, electronic mail, or hand delivery.

- b. A complaint must be in writing and include:
 - 1. A description of the specific acts, conditions or circumstances alleged to violate applicable anti-discrimination laws;
 - 2. The name and contact information, including address, of the complainant;
 - 3. The name and address of the District subject to the complaint;
 - 4. A copy of the District's complaint and appeal decision, if any; and
 - 5. A proposed resolution of the complaint or relief requested.

If the allegations regard a specific student, the complaint must also include the name and address of the student, or in the case of a homeless child or youth, contact information.

- c. Upon receipt of a complaint, the Office of the Superintendent of Public Instruction may initiate an investigation, which may include conducting an independent on-site review. OSPI may also investigate additional issues related to the complaint that were not included in the initial complaint or appeal to the superintendent or board. Following the investigation, OSPI will make an independent determination as to whether the district has failed to comply with RCW 28A.642.010 or Chapter 392-190, WAC and will issue a written decision to the complainant and the district that addresses each allegation in the complaint and any other noncompliance issues it has identified. The written decision will include corrective actions deemed necessary to correct noncompliance and documentation the district must provide to demonstrate that corrective action has been completed.

All corrective actions must be completed within the timelines established by OSPI in the written decision unless OSPI grants an extension. If timely compliance is not achieved, OSPI may take action including but not limited to referring the district to appropriate state or federal agencies empowered to order compliance. A complaint may be resolved at any time when, before the completion of the investigation, the district voluntarily agrees to resolve the complaint. OSPI may provide technical assistance and dispute resolution methods to resolve a complaint.

Level Four—Administrative Hearing

A complainant or school district that desires to appeal the written decision of the Office of the Superintendent of Public Instruction may file a written notice of appeal with OSPI within thirty (30) calendar days following the date of receipt of that office's written decision. OSPI will conduct a formal administrative hearing in conformance with the Administrative Procedures Act, Chapter 34.05, RCW.

MEDIATION

At any time during the discrimination complaint procedure set forth in WAC 392-190-065 through 392-190-075, a district may, at its own expense, offer mediation. The complainant and the district may agree to extend the discrimination complaint process deadlines in order to pursue mediation.

The purpose of mediation is to provide both the complainant and the district an opportunity to resolve disputes and reach a mutually acceptable agreement through the use of an impartial mediator. Mediation must be voluntary and requires the mutual agreement of both parties. It may be terminated by either party at any time during the mediation process. It may not be used to deny or delay a complainant's right to utilize the complaint procedures.

Mediation must be conducted by a qualified and impartial mediator who may not: 1) Be an employee of any school district, public charter school, or other public or private agency that is providing education related services to a student who is the subject of the complaint being mediated; or 2) Have a personal or professional conflict of interest. A mediator is not considered an employee of the district or charter school or other public or private agency solely because they serve as a mediator.

If the parties reach agreement through mediation, they may execute a legally binding agreement that sets forth the resolution and states that all discussions that occurred during the course of mediation will remain confidential and may not be used as evidence in any subsequent complaint, due process hearing or civil proceeding. The agreement must be signed by the complainant and a district representative who has authority to bind the district.

NOTE: The complaint procedure outlined above does not prohibit the processing of grievances by an employee bargaining representative and/or a member of a bargaining unit pursuant to grievance procedures established in local collective bargaining agreements.

VIII. REDUCTION IN FORCE

Reduction in staff will be made in accordance with applicable law and with collective bargaining agreements currently in force. If a reduction-in-force is necessary, consistent with its legal and contractual obligations, the District will attempt to make reductions in force bearing in mind its Affirmative Action commitment.

APPENDIX A: 2023 UTILIZATION ANALYSIS AND GOALS – FEMALES

NORTH THURSTON PUBLIC SCHOOLS

Job Group	Total Employees	Total Female	Percent Female	Total Availability	Statistically Expected Utilization*	Underutilization	Persons Underutilized
Cert. Admin	61	35	57.4%	49.7%	39.8%	N	
Elem. Teachers	481	423	87.9%	73.15%	58.5%	N	
Sec. Teachers	608	419	68.9%	55.8%	44.6%	N	
Instructional Support	26	18	69.2%	76.2	60.9%	N	
Para-Educators	513	439	85.4%	90%	72%	N	
Clerical	110	108	98.2%	96.6%	77.28%	N	
Food Service	85	83	97.6%	43.12%	34.5%	N	
Custodial	66	14	21.2%	46.2%	36.9%	Y	11
Maintenance	26	1	3.9%	11%	8.8%	Y	2
Transportation	103	59	57.3%	49.2%	39.37%	N	
Professional/Technical/ Supervisory	42	22	52.5%	52.2%	41.7%	N	
Total	2,121	1,621	76.4%				

***80% of Total Availability**

APPENDIX B: 2023 UTILIZATION ANALYSIS AND GOALS – BIPOC

NORTH THURSTON PUBLIC SCHOOLS

Job Group	Total Employees	Total BIPOC	Percent BIPOC	Total Availability	Statistically Expected Utilization*	Underutilization	Persons Underutilized
Cert. Admin	61	10	16.4%	11.3%	9.1%	N	
Elem. Teachers	481	57	11.9%	6.5%	5.23%	N	
Sec. Teachers	608	87	14.3%	7.8%	6.23%	N	
Instructional Support	26	3	11.5%	10.8%	8.6%	N	
Para-Educators	513	133	25.9%	22.3%	17.8%	N	
Clerical	110	18	16.4%	13.2%	10.5%	N	
Food Service	85	35	41.2%	26.3%	21.1%	N	
Custodial	68	23	33.8%	28.7%	22.9%	N	
Maintenance	26	7	26.9%	31.6%	25.2%	N	
Transportation	103	15	14.6%	12%	17.8%	Y	4
Professional/ Technical/ Supervisory	42	2	4.9%	18%	14.4%	Y	5
Total	2,121	390	18.4%				

APPENDIX C: 2022-2023 JOB GROUP ANALYSIS

NORTH THURSTON PUBLIC SCHOOLS

Job Group	Total Emp.	Total Female	Percent Female	Total BIPOC	Percent BIPOC	Native Hawaiian/ Pacific Islander	Percent Native Hawaiian/ Pacific Islander	Black/ African American	Percent Black/ African American	Hispanic/ Latino	Percent Hispanic/ Latino	American Indian/ Alaska Native	Percent American Indian/ Alaska Native	Asian	Percent Asian
Cert. Admin	61	35	57.4%	10	16.4%	0	0.00%	4	6.56%	2	3.28%	0	0.00%	4	6.56%
Elem. Teachers	481	423	87.9%	57	11.6%	0	0.00%	11	2.29%	19	3.95%	5	1.04%	22	4.57%
Sec. Teachers	608	419	68.9%	87	14.3%	7	1.15%	18	2.96%	21	3.45%	15	2.47%	26	4.28%
Inst. Support	26	18	69.2%	3	11.5%	1	3.85%	2	7.69%	0	0.00%	0	0.00%	0	0.00%
Para-educators	513	439	85.4%	133	26.3%	11	2.14%	33	6.43%	47	9.16%	12	2.34%	30	5.85%
Clerical	110	108	98.2%	18	16.4%	0	0.00%	5	4.55%	5	4.55%	1	0.91%	7	6.36%
Food service	85	83	97.6%	35	41.2%	0	0.00%	3	3.53%	7	8.24%	2	2.35%	23	27.1%
Custodial	68	14	21.2%	23	33.8%	1	1.47%	3	4.41%	6	8.82%	1	1.47%	12	17.65%
Maintenance	26	1	3.6%	7	26.9%	0	0.00%	3	11.54%	3	11.54%	1	3.85%	0	0.00%
Transportation	103	59	57.3%	15	14.6%	3	2.91%	8	7.77%	4	3.88%	0	0.00%	0	0.00%
Prof/Tech/ Supervisory	42	22	52.4%	2	4.9%	0	0.00%	0	0.00%	0	0.00%	1	2.38%	1	2.38%
Total	2,121	1,621	76.4%	390	18.4%	23	1.08%	90	4.24%	114	5.37%	38	1.79%	125	5.89%

APPENDIX D: NONDISCRIMINATION/AFFIRMATIVE ACTION POLICY

BOARD POLICY NO. 5010

The District will provide equal employment opportunity and treatment for all applicants and staff in recruitment, hiring, retention, assignment, transfer, promotion and training. Such equal employment opportunity will be provided without discrimination with respect to race, creed, religion, color, national origin, age, honorably-discharged veteran or military status, sex, sexual orientation including gender expression or identity, marital status, 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.

The board will designate a staff member to serve as the compliance officer.

Affirmative Action

The district, as a recipient of public funds, is committed to undertake affirmative action which will make equal employment opportunities for staff and applicants for employment. Such affirmative action will include a review of programs, the setting of goals and the implementation of corrective employment procedures to increase the ratio of aged, persons with disabilities, people of color, women, and Vietnam veterans who are under-represented in the job classifications in relationship to the availability of such person having requisite qualifications. Affirmative action plans may not include hiring or employment preferences based on gender or race, including color, ethnicity, or national origin. Such affirmative action will also include recruitment, selection, training, education, and other programs.

The superintendent will develop an affirmative action plan which specifies the personnel procedures to be followed by the staff of the district and will ensure that no such procedures discriminate against any individual. Reasonable steps will be taken to promote employment opportunities of those classes that are recognized as protected groups – aged, persons with disabilities, people of color, women, and Vietnam veterans, although under state law, people of color and women may not be treated preferentially in public employment.

This policy, as well as the affirmative action plan, regulations and procedures developed according to it, will be disseminated widely to staff in all classifications and to all interested patrons and organizations.

Employment of Persons with Disabilities

In order to fulfill its commitment of nondiscrimination to those with disabilities, the following conditions will prevail:

1. No qualified person with disabilities will, solely by reason of disability, be subject to discrimination and the district will not limit, segregate or classify any applicants for employment or any staff member in any way that adversely affects their opportunities or status because of a disability. This prohibition applies to all aspects of employment from recruitment to promotions and includes fringe benefits and other elements of compensation.
2. The district will make reasonable accommodation to the known physical or mental limitations of an otherwise qualified disabled applicant or staff member unless it is clear that an accommodation would impose an undue hardship on the operation of the district program. Such reasonable accommodations may include:
 - a. Making facilities used by staff readily accessible and usable by persons with disabilities; and
 - b. Job restructuring, part-time or modified work schedules, acquisition or modification of equipment or devices, the provision of readers or interpreters and other similar actions.

In determining whether or not an accommodation would impose an undue hardship on the district, factors to be considered include the nature and cost of the accommodation.

3. The district will not use any employment tests or criteria that screen out persons with disabilities unless the test or criteria is clearly and specifically job-related. Also, the District will not use such tests or criteria if alternative tests or criteria (that do not screen out persons with disabilities) are available.
4. While the district may not make pre-employment inquiry as to whether an applicant has a disability or as to the nature and severity of any such disability, it may inquire into an applicant’s ability to perform job-related functions.
5. Any staff member who believes that there has been a violation of this policy or the law prohibiting discrimination because of a disability may initiate a grievance through the procedures for staff complaints.

Nondiscrimination for Military Service

The district will not discriminate against any person who is a member of, applies to be a member or performs, has performed, applies to perform or has an obligation to perform service in a uniformed service, on the basis of that participation in a uniformed service. This includes initial employment, retention in employment, promotion, or any benefit of employment. The district will also not discriminate against any person who has participated in the enforcement of these rights under state or federal law.

Legal References:	RCW 28A.400.310	Law Against Discrimination Applicable to District’s Employment Practices
	28A.640.020	Regulations, guidelines to eliminate discrimination-Scope
	49.60	Discrimination-Human Rights Commission
	49.60.030	Freedom from discrimination- Declaration of civil rights
	49.60.180	Unfair practices of employer defined
	49.60.400	Discrimination, preferential treatment prohibited
	Chapter 73.16	Employment and Re- employment
	42 USC 2000c e1-2000e10	Title VII of the Civil Rights Act of 1964
	42 USC 1681 - 1688	Title IX Educational Amendments of 1972
	42 USC 12101-12213	Americans with Disabilities Act
	8 USC 1324	(IRCA) Immigration Reform
	38 USC §§ 4301-4333	Uniform Services Employment and Reemployment Rights Act
	WAC 392-190	Equal Education Opportunity – Unlawful Discrimination Prohibited
	WAC 392-190-0592	Public school employment – Affirmative action plan
	29 USC 794	Vocational Rehabilitation Act of 1973
	34 CFR 104	Nondiscrimination on the basis of handicap in Programs or activities receiving federal financial assistance
	38 USC 4212	Vietnam Era Veterans Readjustment Assistance Act of 1974 (VEVRAA)

Adopted: March 17, 1986
 Amended: January 10, 2023
 NTSD Board of Directors