



# **Lakewood School District**

AFFIRMATIVE ACTION PLAN

**2024-2029**

LAKEWOOD SCHOOL DISTRICT #306  
**BOARD POLICY #5010**

## **Nondiscrimination and Affirmative Action**

### **Nondiscrimination**

The Lakewood School District is committed to an educational and working environment free from discrimination and harassment as described in this policy. This policy and accompanying procedure prohibits discrimination and harassment of any staff member, volunteers, and contractors who work on behalf of the district.

### **Equal Employment Opportunity**

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, or the use of a trained dog guide or service animal by a person with a disability.

### **Discriminatory Harassment**

Discriminatory harassment is unwelcome conduct that is:

1. Directed toward a person based on a protected characteristic,
2. Sufficiently severe or pervasive;
3. Unreasonably interferes with a person's work environment or ability to perform job duties; and
4. The cause of an intimidating, hostile, or offensive environment.

Examples of discriminatory harassment include, but are not limited to:

- Unwelcome jokes or comments about a legally protected characteristic (e.g., racial or ethnic jokes);
- Disparaging remarks to or about a person's legally protected characteristic (e.g., negative or offensive remarks or jokes about a person's religion or religious garments);
- Displaying negative or offensive posters or pictures about a legally protected characteristic;
- Physical conduct toward a person due to that person's legally protected characteristic;
- All communications, including those conveyed electronically, such as by e-mail, telephone or voicemail, text messaging, or social media or other internet use, that directly or indirectly implicates a legally protected characteristic; or
- Any other unwelcome conduct that implicated a legally protected characteristic.

In most instances, discriminatory harassment does not include supervisory or evaluative practices.

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 effective 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, ethnic minorities, women, and Vietnam veterans who are under-represented in the job classifications in relationship to the availability of such persons 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 or designee 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, ethnic minorities and women and Vietnam veterans, although under state law, racial minorities, 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. Progress toward the goals established under this policy will be reported annually to the board.

### **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 a disability, be subjected 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 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.

Cross References:                   2030 - Service Animals in Schools  
  5011- Sexual Harassment of District Staff Prohibited  
  5270 - Resolution of Staff Complaints  
  5407 - Military Leave

Legal References:                   RCW 28A.400.310 Law against discrimination applicable to districts' employment practices  
  RCW 28A.640.020 Regulations, guidelines to eliminate discrimination — Scope — Sexual harassment policies  
  RCW 28A.642 Discrimination prohibition  
  RCW 49.60 Discrimination — Human rights commission  
  RCW 49.60.030 Freedom from discrimination — Declaration of civil rights  
  RCW 49.60.180 Unfair practices of employers  
  RCW 49.60.400 Discrimination, preferential treatment prohibited  
  RCW 73.16 Employment and Reemployment

WAC 392-190 Equal Education Opportunity – Unlawful Discrimination Prohibited  
WAC 392-190-0592 Public school employment – Affirmative action program  
42 USC 2000e1 – 2000e10 Title VII of the Civil Rights Act of 1964  
20 USC 1681 - 1688 Title IX Educational Amendments of 1972  
42 USC 12101 – 12213 Americans with Disabilities Act  
8 USC 1324 (IRCA) Immigration Reform and Control Act of 1986  
38 USC 4301-4333 Uniformed Services Employment and Reemployment Rights Act  
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 Act of 1974 (VEVRAA)

Management Resources:

2018 - May Issue  
2017 - April Issue  
2014 - December Issue  
2013 - June Issue  
2011 - June Issue  
2011 - February Issue  
Policy News, August 2007 Washington’s Law Against Discrimination  
Policy News, June 2001 State Updates Military Leave Rights

LAKEWOOD SCHOOL DISTRICT #306  
ADMINISTRATIVE PROCEDURES  
BOARD POLICY #5010

## Procedure - Nondiscrimination and Affirmative Action

### **Nondiscrimination**

To ensure fairness and consistency, the following grievance procedure is to be used in the district's relationship with its staff members, volunteers, or contractors who work on behalf of the district. It specifically governs employment problems covered by state and federal equal employment opportunity laws and/or this affirmative action program. No such person's status with the district will be adversely affected in any way because the staff member utilized these procedures. As used in this procedure, "grievance" will mean a complaint which has been filed by a complainant relating to alleged violations of any state or federal anti-discrimination laws. A "complaint" will mean a charge alleging specific acts, conditions or circumstances which are in violation of the anti-discrimination laws. A "respondent" will mean the person alleged to be responsible or who may be responsible for the violation alleged in the complaint.

The primary purpose of this procedure is to secure an equitable solution to a justifiable complaint to this and the following steps will be taken:

### **Affirmative Action Plan**

In order to secure an equitable solution to a justifiable complaint the district will:

1. Make efforts to modify the composition of the future work force in order to work toward a full utilization of aged persons, persons with disabilities, racial and ethnic minorities, women, and Vietnam veterans in the various job categories.
2. Ensure that all applicants and staff are considered on the basis of bona fide job-related qualifications. The purpose of the affirmative action plan is to actively include persons of under-utilized classes in the employment process, not to exclude others from it. The district will continue to emphasize in all recruitment contacts that nondiscrimination is a basic element in the district's personnel procedures.
3. Be responsible for reviewing all employment procedures and programs to assure that there is no indication of discriminatory practices. The district will continue to use aged persons, persons with disabilities, racial and ethnic minorities, women and Vietnam veterans in the recruitment and employment process. Job descriptions for classified staff will be sent to organizations which are recruiting sources for groups that may be under-utilized in the district's work force. Recruitment from colleges and universities will include institutions with high percentages of students of various ethnic minorities.
4. Contract and purchase all goods and services from persons, agencies, vendors, contractors, and organizations who comply with the appropriate laws and executive orders regarding discrimination.
5. Take appropriate action to attract and retain aged persons, persons with disabilities, racial and ethnic minorities, women and Vietnam Veterans at all levels and in all segments of the district's work force. Criteria for selecting staff will be reviewed regularly to assure that such statements relate directly to the requirements for specific positions. However, pursuant to state law there will be no preferential employment practices based on race or gender.
6. Upgrade present staff by providing management development training to assure that individuals of under-utilized groups are prepared for positions of new and increased responsibility.

Implementation of the affirmative action plan will be the responsibility of the superintendent or designee. Administrators will assist in the attainment of the established goals and purposes of this affirmative action plan.

### **Dissemination**

The district will disseminate information concerning employment and developments under the affirmative action plan on a planned basis to assist in achieving the goals set forth in this plan. Affirmative action information will be disseminated by:

1. Printing and distributing such information to staff, school libraries, and offices;
2. Publicizing such information in district newsletters;
3. Conducting meetings with administrative staff to explain the intent and advantages of the policy and plan;
4. Conducting faculty meetings and meetings with classified staff;
5. Informing appropriate and interested recruiting and hiring sources; and
6. Informing all representative staff groups in the district.

### **Internal Audit and Monitoring System**

The superintendent's office, in compliance with [WAC 162-12, Pre-employment Inquiry Guide](#), will record applicant flow, new hires, promotions, transfer requests, transfers, administrative internships, and terminations by age, race, sex, and other protected status. An analysis will be made of the internal and external work force availability of racial and ethnic minorities and women.

The district will evaluate the effectiveness of the nondiscrimination and affirmative action program and report its status to the board semiannually. Such reports may include recommendations for changes in the affirmative action program goals. The overall responsibility for monitoring and auditing this policy is assigned to the district office. The duties include:

1. Analysis of the categories of employment in relation to affirmative action goals;
2. Analysis of work force data and applicant flow;
3. Maintaining records relative to affirmative action information;
4. Preparation of semiannual reports of progress toward the goals and recommended changes required to maintain the vitality of the program;
5. Identifying in a written report to the superintendent any employment practice or policy that is discriminatory or that does not meet the requirements of the affirmative action program; and
6. Keeping the superintendent advised of the progress in implementing the goals and procedures of this affirmative action program.

### **Grievance Procedure**

To ensure fairness and consistency, the following review procedures are to be used in the district's relationship with its staff members, volunteers, or contractors who work on behalf of the district. These review procedures specifically govern employment problems covered by state and federal equal employment opportunity laws and/or this affirmative action program. No person's status with the district will be adversely affected in any way because the staff member utilized these procedures.

1. **Grievance** means a complaint which has been filed by an staff member, volunteer, contractor relating to alleged violations of any state or federal anti-discrimination laws.
2. **Complaint** means a written charge alleging specific acts, conditions or circumstances, which are in violation of the anti-discrimination laws. The time period for filing a complaint is one year from the date of the occurrence that is the subject matter of the complaint. However, a complaint filing deadline may not be imposed if the complainant was prevented from filing due to: 1) Specific misrepresentations by the district that it had resolved the problem forming the basis of the complaint; or 2) Withholding of information that the district was required to provide under WAC 392-190-065 or WAC 392-190-005. Complaints may be submitted by mail, fax, e-mail or hand-delivery to any district, school or to the district compliance officer responsible for investigating discrimination complaints. Any district employee who receives a complaint that meets these criteria will promptly notify the compliance officer.
3. **Respondent** means the person alleged to be responsible or who may be responsible for the violation alleged in the complaint.

The primary purpose of this procedure is to secure an equitable solution to a justifiable complaint. To this end, specific steps will be taken. The district is prohibited by law from intimidating, threatening, coercing, or discriminating against any individual for the purpose of interfering with their right to file a grievance under this procedure and from retaliating against an individual for filing such a grievance.

#### 1. **Informal Process for Resolution**

When a staff member has an employment problem concerning equal employment opportunity, he/she will discuss the problem with the immediate supervisor, personnel director or superintendent within 60 days of the circumstances which gave rise to the problem. The staff member may also ask the compliance officer to participate in the informal review procedure. It is intended that the informal discussion will resolve the issue. If the staff member feels he/she cannot approach the supervisor because of the supervisor's involvement in the alleged discrimination, the staff member may directly contact the compliance officer before pursuing formal procedures. If the discussion with the officer or immediate supervisor does not resolve the issue the staff member may proceed to the formal review procedures. During the course of the informal process, the district will notify complainant of their right to file a formal complaint.

#### 2. **Formal Process for Resolution**

##### **Level One: Complaint to District**

The complaint must set forth the specific acts, conditions, or circumstances alleged to be in violation. Upon receipt of a complaint, the compliance officer will provide the complainant a copy of this procedure. 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. The officer will provide the superintendent with a full written report of the complaint and the results of the investigation.

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. At the time the district responds to the complainant, the district must send a copy of the response to the office of the superintendent of public instruction.

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.

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**

If a complainant disagrees with the superintendent's or designee's written decision, the complainant may file a written notice of appeal with the secretary of the board within ten (10) calendar days following the date upon which the complainant received the response. The board will schedule a hearing to commence by the twentieth (20) 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. Both parties will be allowed to present such witnesses and testimony as the board deems relevant and material. Unless otherwise agreed to by the complainant, the board 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. The decision of the board will be provided in a language the complainant can understand, which may require language assistance for complainants with limited English proficiency in accordance with Title VI of the Civil Rights Act. The decision will include notice of the complainant's right to appeal to the Office of Superintendent of Public Instruction and will identify where and to whom the appeal must be filed. The district will send a copy of the appeal decision to the Office of Superintendent of Public Instruction.

#### **Level Three - Complaint 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 Office of Superintendent of Public Instruction.

1. A complaint must be received by the Office of Superintendent of Public Instruction on or before the twentieth (20) calendar day following the date upon which the complainant received written notice of the board of directors' decision, unless the Office of Superintendent of Public Instruction grants an extension for good cause. Complaints may be submitted by mail, fax, electronic mail, or hand delivery.
2. 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.
3. 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.

### **3. 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 he or she serves 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.

### **4. Preservation of Records**

The files containing copies of all correspondence relative to each complaint communicated to the district and the disposition, including any corrective measures instituted by the district, will be retained in the office of the district compliance officer for a period of 6 years.

#### **Resources**

District Contact  
Tim Haines, Executive Director of HR and Administrative Services  
17110 16<sup>th</sup> DR NE  
Marysville, WA 98271  
360-652-4500  
thaines@lwsd.wednet.edu

State Contacts  
Superintendent of Public Instruction  
Equity and Civil Rights Office  
P.O. Box 47200  
Olympia, WA 98504-7200  
360.725.6162

Washington State Human Rights Commission  
711 South Capitol Way, Suite 402  
P.O. Box 42490  
Olympia, WA 98504-2490  
360.753.6770

Office for Civil Rights  
U.S. Department of Education  
915 Second Avenue, Room 3310

Seattle, WA 98174  
206.607.1600

Adoption Date: 6-19-13  
Revised Dates: **2.20.19**

# Lakewood School District Affirmative Action Plan 2024-2029

## **Introduction**

The district is committed to the concept of 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, or the use of a trained dog guide or service animal by a person with a disability. The Affirmative Action Plan provides a process by which the concept of equal opportunity can be translated into reality.

Periodically, the district needs to assess its accomplishments and deficits in its Affirmative Action in Employment Program as in other areas of the curriculum, student, and support programs.

## **Purpose**

Affirmative Action in Employment is a means of providing equal employment opportunities with specific plans and actions undertaken voluntarily by an agency or organization. Some individuals are still denied equality of opportunity due to their race, sex, age, ethnic origin, religion, or physical disability. Equal opportunity can be a reality only if there is a common acceptance of the goal and a commitment of effort directed toward its achievement.

Affirmative Action federal statutes establish a number of protected classes for employment purposes. Since 2009 federal classes have changed. Protected classes currently include:

1. Aged: Federal and state definition is any person age of 40 and older.
2. Racial Minorities: Any member of an identifiable racial group, which has traditionally, been underrepresented in the professional ranks and/or in the labor force generally. Racial minority groups are American Indian/Alaska Native (to include Aleut, Inuit and other Alaskan Natives); Asian (to include Chinese, Japanese, Filipino, Korean, Samoan, Vietnamese and Indonesian); Black or African American, and Hawaiian/Other Pacific Islander. Hispanic ethnicity is included with the White racial group.
3. Disabled: Physically, mentally, or sensory disabled persons who have traditionally been under-represented in the professional ranks and/or in the labor force when the disability or physical requirement is not a bona fide occupational qualification. Some examples of persons who fit into this class are the sightless, the deaf, amputees, palsied, paraplegics, the speechless, the motor-impaired, and others.
4. Women: Any member of the female sex.
5. Veterans: Vietnam Era Veterans and other Uniformed Services veterans.
6. Disabled Veterans: Any veteran regardless of dates of service.

For the purpose of Affirmative Action, it is permissible to request information on an applicant's race, sex, age, etc., provided it is stated on the application that such information is voluntary and will be used solely for Affirmative Action purposes.

## **Legal Basis for Nondiscrimination and Affirmative Action Programs**

Equal Pay Act of 1963 – Requires all employers subject to the Fair Labor Standards Act to provide equal pay to men and women for equal work on jobs which require equal skill, effort and responsibility, and which are performed under similar working conditions.

Title VI of the Civil Right Act of 1964 – Prohibits discrimination based on race, color, or national origin in any program or activity receiving federal financial assistance.

Title VII of the Civil Rights Act of 1964 – As amended by the Equal Employment Opportunity Act of 1972, prohibits discrimination against employees or applicants for employment on the basis of race, color, religion, sex, or national origin.

Executive Orders 11246 and 11375 – Prohibits discrimination against employees or applicants on the basis of race, color, religion, sex, or national origin and requires affirmative action plans of certain construction and non-construction contractors and subcontractors with the federal government.

Title IX of the Education Amendments of 1972 – Prohibits sex discrimination against students and employees in educational institutions receiving federal financial assistance.

Vocational Rehabilitation Act of 1973, Section 504 – Prohibits discrimination against students and employees in educational institutions receiving federal financial assistance.

Age Discrimination in Employment Act of 1967 – As amended in 1978, prohibits age discrimination against employees or applicants between the ages of 40 and 70.

Vietnam-Era Readjustment Act of 1974 – Requires affirmative action on behalf of disabled veterans and veterans of the Vietnam-era by contractors holding federal contracts of \$10,000 or more.

The Uniformed Services Employment and Reemployment Rights Act of 1994 - Protects civilian job rights and benefits for veterans and members of Reserve components.

Washington State Law Against Discrimination, RCW49.60 – Prohibits discrimination on the basis of race, creed, color, national origin, sex, marital status, age or the presence of any sensory, mental or physical handicap in employment, credit, public accommodations, and publicly assisted housing.

Washington Administrative Code, WAC 392-190 – Prohibits sex discrimination by public schools (K-12).

Washington Administrative Code, WAC 392-190-0592 – Requires public school districts to establish and implement Affirmative Action Employment Policies and Programs

#### School District Policies

The following policies have been adopted by the Lakewood School District Board of Directors and relate to the district's efforts to implement this affirmative action plan:

[Policy 5000](#) – Recruitment and Selection of Staff

[Policy 5010](#) – Non-Discrimination and Affirmative Action

[Policy 5011](#) – Sexual Harassment of District Staff Prohibited

[Policy 5407](#) – Military Leave

#### **Dissemination of Affirmative Action Plan**

The district will disseminate information concerning employment and developments under the affirmative action plan on a planned basis to assist in achieving the goals set forth in this plan. Affirmative action information will be disseminated by:

1. Printing and distributing such information to staff, school libraries, and offices;
2. Publicizing such information in district newsletters;
3. Conducting meetings with administrative staff to explain the intent and advantages of the policy and plan;
4. Conducting faculty meetings and meetings with classified staff;
5. Informing appropriate and interested recruiting and hiring sources; and
6. Informing all representative staff groups in the district.

### **Responsibility**

The Superintendent of the Lakewood School District has the overall responsibility for implementation of the Affirmative Action Program. They will designate an Affirmative Action Officer to aid in the development and implementation of the Affirmative Action Program. The designee is:

Tim Haines, Executive Director of HR and Administrative Services  
17110 16<sup>th</sup> DR NE  
Marysville, WA 98271  
360-652-4500  
[thaines@lwsd.wednet.edu](mailto:thaines@lwsd.wednet.edu)

The superintendent or designee, in compliance with [WAC 162-12, Pre-employment Inquiry Guide](#), will record applicant flow, new hires, promotions, transfer requests, transfers, administrative internships, and terminations by age, race, sex, and other protected status. An analysis will be made of the internal and external work force availability of racial and ethnic minorities and women.

The district will evaluate the effectiveness of the nondiscrimination and affirmative action program and report its status to the board semiannually. Such reports may include recommendations for changes in the affirmative action program goals. The overall responsibility for monitoring and auditing this policy is assigned to the district office. The duties include:

1. Analysis of the categories of employment in relation to affirmative action goals;
2. Analysis of work force data and applicant flow;
3. Maintaining records relative to affirmative action information;
4. Preparation of semiannual reports of progress toward the goals and recommended changes required to maintain the vitality of the program;

5. Identifying in a written report to the superintendent any employment practice or policy that is discriminatory or that does not meet the requirements of the affirmative action program; and
6. Keeping the superintendent advised of the progress in implementing the goals and procedures of this affirmative action program.

In addition, the Affirmative Action Officer has the responsibility of aiding in the development and implementation of an effective Affirmative Action Program and assuring compliance with equal employment opportunity requirements. They will:

1. Interpret the requirements of the Affirmative Action Plan to the staff and to the public and provide informational sessions to these groups when warranted.
2. Work with administrators and employees in the district to assure understanding, implementation, and support for the plan.
3. Monitor the implementation of the Affirmative Action Program.
4. Provide leadership and guidance to all administrators, supervisors, and personnel in the conduct of their employment practices to assure compliance with the district's Affirmative Action Policy. This includes developing hiring processes that provide maximum opportunity and exposure for all protected class applicants to every position vacancy.
5. Develop a procedure for prompt and impartial consideration of complaints of discrimination, which can include compliance with the Title IX regulations prohibiting sex discrimination in education.

All employees are responsible for supporting and helping to carry out the goal and commitment of the district's Affirmative Action Plan within their specific areas of responsibility.

### **Work Force Analysis**

#### **Male/Female Balance and Staff Goals**

The profile of the district's current employment of women is set forth in Figures 1 & 2, with the percentage of Snohomish County residents who identify as female also being reported. The district will strive to reach the goals outlined below and will continue foster and support opportunities for women to attain higher levels of responsibility in both certificated and classified positions. The district will make a good faith effort to recruit and employ individuals consistent with the district commitment to nondiscrimination and affirmative action for all positions. Preferential or adverse employment practices will not be used to meet stated goals or timelines.

In the figures below, the classification of different positions in the district have been grouped by employment association affiliation. All administrators, both classified and certificated, are represented in this group. Our Certificated group represents employees who belong to the Lakewood Education Association. Our non-represented group is comprised of classified staff at the district level who may have supervisory responsibilities and who are not part of one of the other associations or groups. Our Classified staff whose positions are not identified within the Office Personnel group are all members of the Public School Employees of Lakewood (PSE). Our final category are Classified staff members who work as office personnel and are members of the Public School Employees of Lakewood Office Personnel group (PSE-OP).

Male certificated employees are currently being underutilized in the K-8 grades according to the data on workplace gender from the 2023 census as compiled and represented by the [United States Census Bureau](#) for Gender and the ACS 2022 Census data from [Census Reporter](#) for age and race& ethnicity.

2024-2025 Lakewood School District by Female Employee Balance			
Figure 1			
Category	Total # of Employees	Total # of Females	% Female
Administrator	19	11	57.89%
Certificated	157	117	74.52%
Non-Rep	9	7	77.78%
PSE	165	138	83.64%
PSE-OP	20	20	100.00%
TOTAL	370	293	79.19%

% Female Residents in Snohomish County (July 2023)	
	49.50%
	49.50%
	49.50%
	49.50%
	49.50%
	49.50%

2024-2025 Lakewood School District by Classroom Teacher Balance				
Figure 2				
Grade	Total Female	Total Male	Total All	% Male
K-8	99	21	120	17.50%
9-12	18	19	37	51.35%
Total	117	40	157	25.48%

*Teachers – Grades K-8:*

Goal: To provide each student with the opportunity to experience both male and female certificated instructional staff in their elementary and middle school years.

Objective: Increase the number of male staff members to achieve a staff which falls within a range of 20-22% male in the K-8 grades (across grades on average) at the elementary and middle school level by:

- Encouraging male applicants for K-8 positions.
- Enlisting assistance from current male employees in the K-8 levels to share their positive experiences with candidates at job fairs or other recruitment events.
- Showcasing male teachers instructing students at the elementary and middle school levels in district literature.

**Racial & Ethnic Minority Balance and Staff Goals**

The profiles of the district’s current staff racial and ethnic minority make-up, how this is represented in relation to the Snohomish County demographic information, accessed from the ACS 2022 Census data from [Census Reporter](#), and the racial and ethnic minority make-up of the student population are represented below. The district will strive to achieve a rate of employment for underrepresented racial and ethnic minority groups without using preferential employment practices. The goals, outlined below, are for a steady increase, with the attempt to reach a proportional relationship between student (Figure 4)

and staff (Figure 3) demographics within the district. The district will make a good faith effort to recruit, interview, employ, and retain individuals consistent with the district commitment to nondiscrimination and affirmative action for all position across the district. Preferential or adverse employment practices, including demotion or termination will not be used to meet stated goals or timelines.

2024-2025 Lakewood School District by Staff Ethnicity Analysis															
Figure 3															
	Total	Black		Asian		Hispanic		American Indian		Two or More Races		Pacific Islander		Total	% of Staff
		M	F	M	F	M	F	M	F	M	F	M	F		
Administrator	19			1							1			2	10.53%
Certificated	157					1				1	7			9	5.73%
Non-Rep	9													0	0.00%
PSE	165		2	1	2		11		1	1	4	1		23	13.94%
PSE-OP	20				1						1			2	10.00%
TOTAL	370	0	2	2	3	1	11	0	1	2	13	1	0	36	9.73%

### Race and Ethnicity Data

	Black or African American	American Indian & Alaska Native	Asian	Native Hawaiian or Other Pacific Islander	Two or More Races	Hispanic or Latino	White
LWSD Staff	0.54%	0.27%	1.35%	0.27%	4.05%	3.24%	90.27%
Snohomish County	4.0%	1.0%	13.0%	1.0%	7.0%	12.0%	63.0%



**Lakewood SD Student Population 2024-2025**  
(Figure 4)

	American Indian Alaskan Native	Asian	Black African American	Hispanic Latino of any races	Native Hawaiian Other Pacific Islander	White	Two or More Races _F	Totals
# of Students	40	72	58	634	47	1574	276	2701
% of Students	1.48%	2.66%	2.15%	23.47%	1.74%	58.27%	10.22%	~100%

*Administrators*

Goal: To increase the racial diversity of our administrative positions, without using preferential employment practices.

Objectives: Increase racial diversity of our administrators by:

- Promote and place racially diverse staff in administrative positions as they become available, if they have the requisite skills, to make progress towards having an administrative team that is proportionally representative of our student enrollment.
- Identify and provide professional development opportunities for staff who have the potential and desire to become administrators.
- Identify and recruit potential candidates from outside the district for consideration for future openings.

*Teachers: Grades K-12*

Goal: To increase the racial diversity of our teaching positions, without using preferential employment practices, to make progress towards having instructional teaching staff that is proportionally representative of our student enrollment.

Objectives: Increase racial diversity of our teaching staff by:

- Ensuring that job postings and descriptions are free from bias on the basis of race, creed, color, sex, gender, national origin, marital status and/or disability unrelated to employment qualifications.
- Advertise open positions as widely as possible.
- Ensure that district literature portrays the racial/cultural diversity of the district.

*Classified Staff (PSE, PSE-OP, and Non-Represented)*

Goal: To increase the racial diversity of our classified staff, without using preferential employment practices, to make progress towards having classified staff members that is proportionally representative of our student enrollment.

Objectives: Increase racial diversity of our classified staff by:

- Ensuring that job postings and descriptions are free from bias on the basis of race, creed, color, sex, gender, national origin, marital status and/or disability unrelated to employment qualifications.
- Advertise open positions as widely as possible.
- Ensure that district literature portrays the racial/cultural diversity of the district.

**Age Balance and Staff Goals**

The profiles of the district’s current age distribution of administrative, certificated, and classified staff is set forth in Figure 5. The demographic information for Snohomish County, access from the ACS 2022 Census data from [Census Reporter](#), identifies that 48% of the population is age 40 or above. This analysis

indicates that representation of employees over age 40 exceed the theoretical availability and statistically expected utilization in each of the job classifications. The age group of over 40 is not underutilized. While this is not an area in which a target goal for an increase or change has been identified, the district will continue to make a good faith effort to recruit, interview, and employ individuals consistent with the commitment to nondiscrimination and affirmative action provide the prospective staff member meets the requisite standards for the specific position.

2024-2025 Lakewood School District by Staff Age Analysis					
Figure 5					
Category	Total Employees	Age 40+ Male	Age 40+ Female	Total	% 40+
Administrator	19	7	11	18	94.74%
Certificated	157	22	69	91	57.96%
Non-Rep	9	2	7	9	100.00%
PSE	165	19	101	120	72.73%
PSE-OP	20	0	13	13	65.00%
TOTAL	370	50	201	251	67.84%

### **Analysis**

In establishing the affirmative action program goals, it is assumed that the employment profile of the district should reflect the demographic profile of the local area. In this case, the local area includes Snohomish County.

Analysis of the certificated employees shows:

- An unusually high proportion in the over forty years old category.
- A need to encourage and recruit more males for teaching positions in the K-8 grades.
- The district has made some progress towards greater gender balance in certificated areas.
- A need to recruit more racially diverse applicants to apply for all positions so that staff members are proportionally representative of our student enrollment.
- A need to expand relationships with organizations that are sources of potential applicants from diverse backgrounds.

### **Internal Audit and Reporting**

The Human Resources office will maintain appropriate records for each job category on the basis of race and ethnicity and other appropriate demographic characteristics.

Twice a year the Affirmative Action Officer reviews the positions available and records of applicants, interviews and hiring to assure compliance with state and federal regulations and to prepare a work force analysis report.

The Affirmative Action Officer provides semi-annual reports on the status of the affirmative action plan to the Superintendent and the School Board.

### **Supportive Systems**

The Lakewood School district is committed to recruiting and retaining a diverse staff and to meeting the goals and objectives of the affirmative action plan. District professional development has and will continue to focus on the implementation of the state approved [Cultural Competency, Diversity, Equity, and Inclusion \(CCDEI\) Standards](#).

### **Reduction-In-Force**

Lakewood School District's reduction-in-force procedures for bargaining unit positions are established by collective bargaining agreements. Seniority within the appropriate job group is the principal factor determining retention.

Reduction-in-force procedures for administrative and other exempt positions are established by School Board policy and do not explicitly address Affirmative Action.

### **Summary**

- The district's workforce has a very high percentage of employees over 40 years of age. In the years to come, a number of openings are anticipated in all areas due to retirements. This should give the district an opportunity to seek out quality employees in protected categories in order to provide an improved staffing balance.
- There is a continuing need to encourage high quality employees in protected categories to seek upward mobility.