

Iowa City Community School District

2020 – 2021 Equal Employment Opportunity and Affirmative Action Plan

November 2020

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Iowa City Community School District

1725 N. Dodge Street

Iowa City, IA 52245

Iowa City Community School District Equal Employment Opportunity/Affirmative Action Plan

Overview

The District Affirmative Action Plan begins with the Administrative Statement and includes copies of related Board policies. The Board policies establish the legal foundation and principles upon which the District will operate.

The remaining documents, studies, and surveys are included to promote easy access for implementation and focus. They outline the duties of the program coordinators, the duties and make-up of the required committee, and analysis of the current workforce, along with District goals and action plans to promote affirmative action.

ICCSD Mission Statement

The mission of the Iowa City Community School District is to ensure all students become responsible, independent learners capable of making informed decisions in a democratic society as well as in the dynamic global community; this is accomplished by challenging each student with a rigorous and creative curriculum taught by a diverse, professional, caring staff strengthened by collaborative partnerships with families and the entire community.

Non-Discrimination Policy Statement

Annual Notice of Non-Discrimination Policy Statement

It is the policy of the Iowa City Community School District not to discriminate on the basis of race, color, national origin, sex, disability, religion, creed, age, marital status, sexual orientation, gender identity and socioeconomic status in its educational programs, activities, or employment practices. There is a grievance procedure for processing complaints of discrimination. If you have questions or a grievance related to this policy, please contact Jeremy Tabor, Director of Equity & Employee Relations, 1725 N. Dodge St., Iowa City, IA 52245, 319-6881000, Tabor.Jeremy@iowacityschools.org.

Continuous Notice of Non-Discrimination Policy Statement

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Equal Employment Opportunity

Code No. 401.1

The Iowa City Community School District will provide equal opportunity to employees and applicants for employment in accordance with applicable equal employment opportunity and affirmative action laws, directives and regulations of federal, state and local governing bodies. Opportunity to all employees and applicants for employment includes hiring, placement, promotion, transfer or demotion, recruitment, advertising or solicitation for employment, treatment during employment, rates of pay or other forms of compensation, and layoff or termination. The school district will take affirmative action in major job categories where women, men, minorities and persons with disabilities are underrepresented. Employees will support and comply with the district's established equal employment opportunity and affirmative action policies. Employees will be given notice of this policy annually. The board will appoint an affirmative action coordinator. The affirmative action coordinator will have the responsibility for drafting the affirmative action plan. The affirmative action plan will be reviewed by the board at least every two years.

Date of Adoption: 8/23/11

Revised: 1/12/16

Legal Reference:

29 U.S.C. §§ 621, 623, 625, 626, 627, 628, 629, 630, 631, 633 (2015).
42 U.S.C. §§ 2000e et seq. (2015). 42 U.S.C. §§ 12101 et seq. (2015). Iowa Code §§ 19B; 20;
35C; 73; 216; 279.8 (2015).
281 I.A.C. 12.4; 95. (2015).

Anti-Bullying/Harassment Policy

Code No. 104

The Board is committed to providing a safe and civil school environment in which all members of the school community are treated with dignity and respect. As a result, harassment and bullying of students, school employees, applicants, vendors, visitors, and/or volunteers are not tolerated by the Board to that end, the Board has in place policies, procedures, and practices that are designed to reduce and eliminate bullying and harassment as well as processes and procedures to deal with incidents of bullying and harassment.

“Volunteer” is defined as an individual who has regular, significant contact with students and does not refer to non-district persons who serve in “one-time-only” functions.

The Board prohibits harassment, bullying, hazing, or any other victimization, of students, school employees, applicants, vendors, visitors, and/or volunteers, based on any of the following actual or perceived traits or characteristics, including but not limited to, age, gender, color, creed, national origin, race, religion, marital status, sex, sexual orientation, gender identity, veteran status, physical attributes, physical or mental ability or disability, ancestry, political party preference, political belief, socioeconomic status, or familial status. Adherence to bona fide occupational/educational qualifications shall not be interpreted as discriminatory.

This policy is in effect while students, employees, applicants, vendors, visitors, and/or volunteers are on property within the jurisdiction of the Board; while on school-owned or school-operated vehicles; while attending or engaging in school-sponsored activities; and while away from school grounds if the misconduct directly affects the good order, efficient management and welfare of the school or school district.

If, after an investigation, a person is found to be in violation of this policy, he/she shall be disciplined by appropriate measures up to, and including:

- for a student, suspension and expulsion;
- for an employee, termination; and,
- for an applicant or school vendor, visitor, or volunteer, exclusion from school grounds

Harassment and bullying shall be defined as any electronic, written, verbal, or physical act or conduct that is based on any actual or perceived trait or characteristic of a person and that creates an objectively hostile school environment that meets one or more of the following conditions:

- Places the person in reasonable fear or harm to the person or substantial harm to the person’s property;
- Has a substantial and detrimental effect on the person’s physical or mental health;
- Has the effect of substantially interfering with the person’s performance; or

- Has the effect of substantially interfering with the person's ability to participate in or benefit from the services, activities, or privileges provided by the district.

"Electronic" means any communication involving the transmission of information by wire, radio, optical cable, electromagnetic, or other similar means. "Electronic" includes but is not limited to communication via electronic mail, internet-based communications, pager service, cell phones, electronic text messaging or similar technologies.

Harassment and bullying may include, but are not limited to, the following behaviors and circumstances:

- Verbal, nonverbal, physical or written harassment, bullying, hazing, or other victimization that have the purpose or effect of causing injury, discomfort, fear, or suffering to the victim;
- Repeated remarks of a demeaning nature that have the purpose or effect of causing injury, discomfort, fear, or suffering to the victim;
- Implied or explicit threats concerning one's grades, achievements, property, etc. that have the purpose or effect of causing injury, discomfort, fear or suffering to the victim;
- Demeaning jokes, stories, or activities directed at the student that have the purpose or effect of causing injury, discomfort, fear or suffering to the victim; and/or
- Unreasonable interference with a person's performance or creation of an intimidating, offensive, or hostile environment.

For the purposes of this policy, sexual harassment is defined as unwelcome advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature when:

- Submission to such conduct is explicitly or implicitly made a term or condition of status in a class, pro-gram, or activity;
- Submission to or rejection of such conduct is used as a basis for an educational decision affecting student; or
- Such conduct has the purpose or effect of interfering with a performance, or of creating an intimidating, hostile, or offensive environment for learning.

Sexual overtures by a staff member to a student shall be investigated per the child abuse law in chapter 102 of the Iowa Department of Education administrative code. Any sexual overtures by a staff member to a student, whether welcome or unwelcome, are prohibited and shall be grounds for discipline, including discharge of the staff member.

The school or school district will promptly and reasonably investigate allegations of bullying or harassment.

Retaliation against any person because the person has filed a bullying or harassment complaint or assisted or participated in a harassment investigation or proceeding, is prohibited. Individuals who knowingly file false harassment complaints and any person who gives false statements in an investigation shall be subject to discipline by appropriate measures, as shall any person who is found to have retaliated against another in violation of this policy.

The Board will annually publish this policy. The policy may be publicized by the following means:

- Inclusion in the student handbook
- Inclusion in the employee handbook
- Inclusion in the registration materials
- Inclusion on the school or school district's website, (other)

Copies will be available to any person at the Central Administrative Office at 1725 N. Dodge Street, Iowa City, IA 52245.

Date of Adoption: 10/23/07

Reference: Revised: 1/08

8/23/11 Code of Iowa 708.7, 20 U.S.C. §§ 1221-1234 (2004)
29 U.S.C. §§ 794 (1994) 42 U.S.C. §§ 2000d-2000d-7 (2004) §
42 U.S.C. §§ 12001 et.seq. (2004)
Senate File 61, 1st Regular Session, 82nd General
Assembly, (2007)
Code of Iowa §§ 216.9; 280.3 (2007)
281 I.A.C. 12.3(6) IASB Policy No. 104 (2011)

Administrative Statement

The Iowa City Community School District is committed to equal opportunity employment and affirmative action.

The Equal Employment Opportunity/Affirmative Action Plan contains the policies and goals we will use as a guide to providing equal employment opportunities. The District will not discriminate in employment practices on the on the basis of race, color, national origin, sex, disability, religion, creed, age, marital status, sexual orientation, gender identity and socioeconomic status in its educational programs, activities, or employment practices. To ensure this practice, a continuous review of recruitment, applicant screening, hiring, assignment, staff development, staff advancement, and grievance procedures will be implemented.

The Equal Employment Opportunity/Affirmative Action Plan is designed to overcome historic and systemic inequities in staffing patterns. The District's mission statement highlights the importance for students to be "taught by a diverse, professional, caring staff" in order to prepare students for living and working in diverse communities and for success in a global economy. This plan also affirms the commitment of the district to create a strong, collaborative partnership with families and the entire community through employment opportunities. These opportunities bring increasing stability and credibility to the area which attracts increased economic development and investment into the state.

It is the District's intent to provide a fair and supportive work environment for all employees and to reduce and eliminate stereotypes. To this end, policies, goals, implementation timelines and staff to measure progress have been designated. The workplace will be free of harassment which is sexual in nature or which has a demeaning intent related to race, color, national origin, sex, disability, religion, creed, age, marital status, sexual orientation, gender identity and socioeconomic status. To engage in such, will be a violation of District policy.

The Chief Operating Officer and the Director of Equity and Employee Engagement are charged with monitoring the process of the goals established by the plan and for reporting appropriate information to the administration and to the Board of Directors.

This plan is designed to meet the requirements of Chapter 19B of the Iowa Code and Chapter 95 of the Iowa Administrative Code.

Superintendent's Signature

Date

Workforce Analysis

(profile of the current workforce by race, gender and disability within each major job category. This data is representative of all district employees as of October 1, 2020)*

2020 – 2021 Chart 1: Ethnic and Gender Breakdown of Administrative Staff

	American Indian or Alaskan Native	Asian	Hispanic or Latino	African American	Two Or More Races	White	Male	Female	Total
Education Services Center	0	0	0	2	0	17	10	9	19
Principals	0	0	1	2	0	25	9	19	28
Assistant Principals	0	0	0	1	1	8	2	8	10
Dean of Students	0	0	0	2	0	3	2	3	5
Athletic Directors	0	0	0	0	0	3	3	0	3
TOTAL	0	0	1	7	1	56	26	39	65
Percentage	0%	0%	1.5%	10.8%	1.5%	86.2%	40%	60%	

*currently we do not track disability

2020 – 2021 Chart 2: Ethnic and Gender Breakdown of Teachers

	American Indian or Alaskan Native	Asian	Hispanic or Latino	African American	Two or More Races	White	Male	Female	Total
Elementary	1	5	10	11	11	545	78	505	583
Secondary	0	6	11	9	11	374	178	233	411
Other Teachers	0	1	1	3	1	108	15	99	114
Guidance Counselors	0	0	1	2	1	33	13	24	37
Teacher Librarians	0	0	0	0	1	26	1	26	27
TOTAL	1	12	23	25	25	1,086	285	887	1,172
Percentage	0.1%	1.0%	2.0%	2.1%	2.1%	92.7%	24.3%	75.7%	

2020 – 2021 Chart 3: Ethnic and Gender Breakdown of Support Staff

	American Indian or Alaskan Native	Asian	Hispanic or Latino	African American	Two or More Races	White	Male	Female	Total
Nutrition Staff	1	4	13	4	0	75	5	92	97
Kitchen Managers	0	0	0	0	0	8	1	7	8
Off Schedule	0	0	0	3	2	46	9	42	51
Para Educators	0	10	34	83	10	317	90	364	454
Physical Plant	0	3	12	21	2	130	149	19	168
Other Professionals	0	1	3	15	2	43	18	46	64
Secretaries	0	1	3	1	0	77	2	80	82
Technical Supervisor	0	1	2	2	1	32	18	20	38
TOTAL	1	20	67	129	17	728	292	670	962
Percentage	0.1%	2.1%	7.0%	13.4%	1.8%	75.6%	30.4%	69.6%	

Quantitative Analysis

(comparison of the representation of diverse racial/ethnic groups, women, men and persons with disabilities within each major job category in the workforce with their availability in the relevant labor market)

Below is listed the operational definition for three terms that will be used to help determine the number of employees of color that the District should be able to hire given the geographic location and the applicant pool needed to fill job openings:

- Availability – the extent to which members of a racial/ethnic group, and women, men or persons with disabilities are present within the relevant labor market.
- Relevant labor market – the geographic area in which an agency can reasonably be expected to recruit for a particular job category.
- Under representation – having fewer members of a racial/ethnic group, or women, men or persons with disabilities in a particular job category than would be reasonably expected based on their availability in the relevant labor market.

There are no established criteria for determining the geographic area in which a District can reasonably be expected to recruit for any given job category. There is, however, a general perception that guidelines for recruitment should stretch to school districts beyond the area parameters in which the District is currently recruiting.

Availability Analysis

The following guidelines have been established for determining the availability of under-represented staff for job categories as listed below:

Position	Area
• ESC Administrators	Nationwide
• Principals	Nationwide
• Associate Principals	Nationwide
• Elementary/Secondary Teachers	Iowa & contiguous states
• Other Specialized Teachers	Iowa & contiguous states
• Guidance Counselors	Iowa & contiguous states
• Teacher Librarians	Iowa & contiguous states
• Teachers of Color	Nationwide
• Paraeducators	Local
• Custodial	Local
• Maintenance	Local
• Secretarial	Local
• Food Service	Local
• Technical – IT	Local & State

Human Resources primary focus for advertising current openings is through the District's applicant tracking system. Job fairs and other one-off events are also used. After a successful on-site job fair in December 2019. The district is unable to repeat the event as a result of Covid-19. The district will continue to work with and leverage resources to gain strategic and tactical advantages, when possible, during the Spring 2021 hiring season.

Also, research shows a majority of minority, especially African American, teachers graduate from Historically Black Colleges and Universities. The district will again, leverage the remote interviewing structure to proactively recruit from these schools to create a direct source of candidates who are generally difficult to target.

Additional information regarding District recruitment and retention strategies will be provided during the annual human resources report, which is provided to the Board in the spring.

Relevant Labor Market Analysis

To determine the relevant labor market for the Iowa City Community School District, data was gathered from analyzing official reports that describe the available labor force at the national, state and local level.

State Findings

The state availability data was provided by the Department of Education's document entitled *The Annual Condition of Education Report (2018)*. The report presents data for students, teachers, principals, superintendents, and other licensed positions. Age, race/ethnicity, gender, experience, and salary data are included.

Racial/Ethnic Distribution of Students

Iowa is becoming more racially/ethnically diverse as evident from changes in enrollment. While the trend for overall student enrollment in Iowa's schools has seen continuous growth over the past decade, the number of students of color is at an "all-time high" comprising 25.7% of the state's student population. This is an increase from 23.5% over the past four years. Hispanic student enrollment represents the highest percentage of race/ethnic minority, maintaining 11.5% of the overall population and 45% of the total minority population.

Despite the enrollment growth for students of color in Iowa schools, Iowa's percentage of students of color remains relatively low in comparison to other states. In 2018–2019, Iowa reported a student of color enrollment of 25.5%, ranking 44 out of 51 states in the nation (down from 41 last year). Comparatively, 53% percent of the students in the United States are classified as people of color (up from 51.8 last year).

In the Iowa City Community School District, the student of color enrollment has increased from 40.3% for the 2015–2016 school year to 44.8% for the 2019–2020 school year.

Characteristics of Teachers

In general, there have been few changes in the characteristics of public school teachers in Iowa since 2014–2015. The percent of female teachers have increased from 75.1% to 76.1% percent; whereas, the average age has decreased from 41 to 40.7 respectively. The percent of teachers of color saw a slight uptick to 2.7% after spending the previous five years at 2.2%. The average years of total experience a slight decrease from 13.7% to 13.5% and average years of district experience decreased from 11.1% to 10.3% between 2014–2015 and 2019–2020.

According to reports from the Economic Policy Institute (April 2019) and National School Boards Association (May 2019) there are a dwindling number of postsecondary students in education. Data shows between 2010 and 2017 there was a 38% drop in students enrolled in teacher prep programs, 27.4% drop in number the of teachers who completed a teacher prep program, and 15.4% drop in education degrees awarded. Additionally, 30% of college graduates have left the profession within five years.

Teachers of Color Characteristics

In 2019–2020, there were ~1,000 teachers of color, representing 2.7% of the 37,567 total fulltime public school teachers, in the state of Iowa. Within our district, we have 77 (up from 60 in 2014-2015) teachers of color, increasing to 6.8% from 5.7%. Female teachers of color represent 5.5% of the teachers, and male teachers of color represent 1.3%.

On the surface this appears to be a significant difference. However, compared to 3 years ago, the District has seen a decrease in the difference in age, years of experience, and advanced degrees for teachers of color as compared to their white counterparts. This is actually a positive indicator for the recruitment success of the human resources department. With an increase in the number of teachers, the percentage of teachers of color increased over the same timeframe indicating that the District is hiring teachers of color at a higher rate than white teachers. These statistics indicate that despite a continued decrease in the number of teachers of color across the nation, ICCSD has successfully recruited new and recent graduates into the district.

Characteristics of Principals

In 2014–2015, there were 1,153 public school principals in Iowa. By 2019–2020, the number of principals decreased slightly to 1,146. Since 2014–2015, the number of female principals marginally increased from 41.1% to 39.4%. In that same time interval, the average age of principals increased slightly from 46.1 to 46.2 years of age. Principals of color in Iowa schools in the 2014–2015 school year made up 2.9% of the total. In the 2019–2020 school year, principals of color make up 3.5% of the total. ICCSD increased from six to eight over the past four years, increasing to 13.3%. Again ICCSD continues to outpace the state in the number of principals of color.

Under-Representation

Under-representation currently exists in three employment categories in the District: administrators, teachers, and support staff. The 2015-2016 hiring goals of 15% staff of color will be modified to focus specifically on continued focus to increase both the percentage and overall number of teachers and staff of color over the next three years. The district will achieve this goal through a focus on recruitment and retention of staff of color, including teachers, administrators, and support staff.

Area of Focus Analysis

(periodic self-evaluation of employment and personnel policies and practices for fairness on the basis of race, creed, color, religion, sex, age, national origin, sexual orientation, gender identity, or disability)

The Affirmative Action Plan should encompass five areas: policies, procedures, recruitment, retention, and staff development. An analysis of District's policies and practices was conducted by the Director of Equity and Employee Relations. The purpose of the review was to examine areas where District practices might tend to exclude, disadvantage, restrict or result in adverse impact on current or prospective employees. The goal of the District is to prevent any such occurrences.

The following is a brief overview outlining the areas of concern:

Policies and Procedures

Recruitment practices and policies are annually evaluated by the Chief Operations Office. Goals are set, annually reviewed, and new goals established based on the hiring needs of the District and outcome of the study. The Diversity, Equity, and Improvement plan, created in 2019, has a goal to "Attain Diverse and Culturally Proficient Teachers, Administrators, and Staff". The primary components of this plan involves the recruitment and retention of underrepresented staff. This will continue to be the primary goal of the district in our attempts to drive equity among all employee populations.

Recruitment

Hiring Goals of the District/School Buildings

Numerical goals result from annual reemployment reviews conducted by the Chief Operations Officer. An analysis of the composition of the workforce generates a list of the areas where portions of the population are not present in the workforce or are underrepresented. Goals for achieving equal employment are approved by the Board of Directors and become the basis for recruiting and ultimately hiring employees for the District.

Hiring procedures need to constantly be reviewed to allow equity to consistently attract more candidates of color in the hiring process. Recruitment starts with increasing the number of applicants of color for open positions. One major component contributing to the success of diverse hiring process would be a stronger emphasis on the establishment of hiring goals for individual departments and buildings set by the principals and/or supervisors. The District's assistant superintendents will hold principals and supervisors accountable to meet the hiring goal through the evaluation process.

Application and Screening Policies and Practices

Application procedures are monitored and revised periodically as needed by the Director of Human Resources. The screening and interview procedures were revised to require statements from building principals when candidates of color were not interviewed. The statements must detail why diverse candidates were not included in the interview process. The procedure is a precautionary action which serves as a reminder of our commitment to equity. The measure assists staff members who are responsible for hiring to remain cognizant of the District's diversity and equity goals. This measure also reinforces the District's requirement that principals interview at least one candidate of color for each open position. The District's assistant superintendents will hold principals and supervisors accountable to meet the hiring goal through the evaluation process.

Staff Development

- Personnel in charge of hiring

Administrators and supervisors must embrace and follow the expectations and rationale for employing a diverse staff that reflects the changing student demographics in the District and that will help the District reach its numerical goals. Periodic staff development needs to be conducted to provide training on the legal/ethical hiring practices and affirmative action guidelines.

- Employee Staff Development

Staff development must be provided for all employees to increase cultural competence and provide strategies for working with the increasing number of students and staff with diverse backgrounds. It is critical for all certified staff to receive training on a variety of teaching/learning and classroom management strategies to meet the wide variety of student needs. To address the needs of noncertified staff, in-services days are provided/required for paraprofessionals that are unique to their assignment and personal needs. Other support staff employees are trained in the areas needed to ensure they are working in a safe environment and that they are receiving the support and knowledge needed to perform their job duties and be successful.

Mentoring of New Employees

In addition to providing a quality environment for teaching and learning, targeted staff development opportunities are afforded to all staff and mentors are provided for new staff. A review of District practices reveals initial staff development sessions and mentoring programs exist for certified staff members who are new to the District and/or profession. New staff members

also receive support from the staff development team. Iowa legislation gives new to the profession teachers and administrators strong District support and mentoring for their first two years.

The intense focus on mentorships is producing immediate results on teacher quality and hopefully will positively impact teacher retention and student achievement. Veteran teachers and administrators serving as paid mentors also grow from the induction process. Previous plans identified a community support system an area of emphasis for our teachers of colors. During the 2018 – 2019 school year, a number of gatherings were offered teachers and administrators of color to start to build a community support system within the District. In the beginning of the 2019 – 2020 school year, one event was offered to students, staff and public. The event was well attended with several more scheduled throughout the school year.

Staff Retention

The retention of staff members is monitored annually to assess the District's progress in this area. The feedback from exit surveys has been generally positive of the District. However, during the 2018 – 2019 school year, the District administered a survey specifically for teachers and administrators of color that did not yield positive results.

The survey results identify a need for the District to be more deliberate in current efforts and a need to address other areas of concern. Below is a general list of concerns found in the survey.

- Lack of support for staff of color in the District
- There is a desired need for more diverse staff
- Need for opportunities for advancement in leadership roles
- Need for increased professional development on bias and systemic inequality

Rate and Turnover in the Certified Staff Positions

The District hires an average of between 60 and 100 new certified staff members yearly. This number of new hires is a result of the natural attrition which occurs regularly as people retire, resign, or take leaves of absence. A number of new positions are added each year as a result of enrollment increase, depending on the number of additional students the previous year and the monetary resources available. The employee turnover rate and the hiring of additional staff caused by student growth offer the District opportunities to diversify the workforce. When these openings occur, principals and supervisors are expected to diligently seek candidates of color.

Qualitative Goals

- 1) Continue to recruit at the University of Iowa and University of Northern Iowa job fairs. Have the authority to attend at least one national job fair and the permission to offer applicants an opportunity to interview in Iowa City (paid mileage). If prescreened, candidates could be offered teaching positions on site.
- 2) Advertise on diverse websites and with recruitment organizations for teachers and administrators of color to increase the number of candidates.
- 3) Collaborate with other UEN school districts to recruit staff.
- 4) Involve existing staff and alumni of color to network with friends and family, encouraging candidates of color to apply for open positions.
- 5) Continue to monitor hiring goals and progress by building.
- 6) Continue gatherings for teachers and administrators of color and work to expand support into the community.
- 7) Implement increased recruitment on areas of need identified in the redefined workforce analysis.