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**Annual Update to the
Five-Year
Affirmative Action Plan
2014-2019**

Update for Fiscal Year 2016-17

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President

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The Annual Update Five-Year Affirmative Action Plan (2014-2019) (Plan) (Update for Fiscal Year 2016-17) affirms the continued commitment of the Wisconsin Indianhead Technical College (WITC) (College) to actively implement all appropriate federal and state equal opportunity and affirmative action laws, executive orders, plans, rules and regulations. This Plan was developed in accordance with the guidelines as established by the Wisconsin Technical College System Board.

Section 1- Goals/Initiatives Activities

Employment Program Affirmative Action Initiatives

Program 1: Implement targeted recruitment plans based on race/ethnicity.

Program 1- Initiative A:

Expand outreach and recruitment contacts with minority advocate organizations and publications.

- Completed in 2015/16 Plan Year with the utilization of Wisconsin Diversity Website for recruitment of all positions.

Program 1- Initiative B:

Participate in career fairs, both virtually and face-to-face, that target minority outreach.

- Completed in 2015/16 Plan Year with annual participation in career fairs that target minority outreach, primarily virtual format

Program 1- Initiative C:

Further develop and expand relationships with tribes Districtwide to promote Collegewide career opportunities.

Action Item	Responsibility	Timeline
Step 1: Determine tribal outreach opportunities and avenues available to share Collegewide career opportunities.	HR Department	2016/17 – began process Training opportunities expanding – will build on presence for recruiting
Step 2: Develop and implement one additional recruitment campaign to target tribes for employment.	HR Department	2018/19

Program 1- Methods of Evaluation

The number of minorities generally in the WITC workforce and in specific categories of application and employment, will be evaluated annually by Human Resources. Increased outreach will be a general indicator of success. Each program initiative involved will be reviewed and evaluated each year through the Annual Affirmative Action Plan update.

Program 2: Implement targeted recruitment and retention strategies for disabled staff.

Program 2 - Initiative A:

Expand outreach and recruitment contacts with disability advocate organizations.

Action Item	Responsibility	Timeline
Step 1: Research and develop a listing of disability advocate organizations and services provided.	HR Department	2014/15 - completed
Step 2: Research and implement at least one outreach activity with a disability advocate organization.	HR Department	Targeted completion in FY18
Step 3: Work with the above advocate organization to establish a collaborative relationship, including but not limited to temporary working situations, presentations, resume review and/or site visits.	HR Department	2017/18 Accommodations group in Student Services building opportunities for disabled students – HR to build on presence

Program 2 - Initiative B:

Survey current employees to document more accurate information on the disability status of current employees.

Action Item	Responsibility	Timeline
Step 1: Develop a survey to gather disability status information from current employees.	HR Department	2014/15 - completed
Step 2: Conduct a survey to gather disability status information from current employees.	HR Department	Targeted for 2017/18
Step 3: Record disability status information in PeopleSoft for future reporting use.	HR Department	Targeted for 2018/19

Program 2 - Methods of Evaluation

The number of employees with a disability, both generally in the WITC workforce and in specific categories of employment, will be evaluated annually by Human Resources and ensure accommodations are implemented as needed. Accommodations processes reviewed for improvement. The College will track the number of employees with a disability by gathering the data from new employees upon hire and from surveying active employees every five-ten years. The survey of active employees is voluntary. Each program initiative involved will be reviewed and evaluated each year through the Annual Affirmative Action Plan update.

Program 3: Create a culture of diversity Collegewide. Provide College staff with resources needed to promote multi-generational, multi-cultural, gender and disability awareness and sensitivity.

Program 3 - Initiative A:

Implement a standard diversity-related qualification for all College positions.

Action Item	Responsibility	Timeline
Step 1: Research purposeful, relevant diversity-related qualification requirements for all levels and groups of employees; seek input from other colleges, businesses, community organizations and employees.	HR Department	2017/18 In revised job descriptions will list essential functions with more specificity.
Step 2: Update job descriptions and job postings, as appropriate to include the qualification statement as appropriate.	HR Department	2018/19 All job descriptions and evaluation materials will be revised as appropriate

Program 3 - Initiative B:

Implement a standard diversity-related interview question for all College positions.

Action Item	Responsibility	Timeline
Step 1: Research and consider a purposeful, relevant diversity-related interview question for all levels and groups of employees.	HR Department	2017/18 Continue to use general diversity question until replaced
Step 2: Implement a standard diversity interview question for all positions.	HR Department	2018/19
Step 3: Write instructions and train recruitment committee participants	HR Department	2018/19

Program 3 - Initiative C:

Provide a new diversity-related professional development offering to all staff.

Action Item	Responsibility	Timeline
Step 1: Identify opportunities for online and face-to-face diversity training.	HR Department	2014/15 - completed
Step 2: Provide training to all staff to create a competency of diversity awareness including in the Faculty Quality Assurance System.	HR Department	2017/18/19 - Faculty offering in place currently Diversity courses created for all employee groups in professional development plans

Step 3: Develop and offer recognition of completion of the training.	HR Department	2018/19 New LMS Maestro will track and prepare certifications
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Program 3 - Methods of Evaluation

The improvement in awareness, competence and support for diversity in the organization will be measured through a follow up survey when training is conducted. Each program initiative involved will be reviewed and evaluated each year through the Annual Affirmative Action Plan update.

Program 4: Implement military service and veteran staff recruitment and retention strategies.

Program 4 - Initiative A :

Implement military service and veteran staff recruitment strategy.

Action Item	Responsibility	Timeline
Step 1: Research and identify our current and possible proposed military service and veteran staff recruitment strategies.	HR Department	2014/15/16 - completed
Step 2: Outreach with the Wisconsin Employment Resource Connection (WERC) to determine a relevant and realistic military service and veteran staff hiring goal for our District.	HR Department	2017/18
Step 3: Implement a new and improved military service and veteran staff recruitment strategy.	HR Department	2017/18/19

Program 4 - Initiative B:

Implement military service and veteran staff retention strategy.

Action Item	Responsibility	Timeline
Step 1: Research and identify military service and veteran staff retention strategies.	HR Department	2017/18
Step 2: Implement a military service and veteran staff retention strategy.	HR Department	2018/19

Program 4 - Methods of Evaluation

The College will track the number of military service and veteran staff members by gathering the data from employment applicants upon application, from new employees upon hire and from surveying active employees every five years. The survey of active employees is voluntary. The College will evaluate the progress of this program by reviewing the number of military service

and veteran staff members applied and/or employed at the College. Each program initiative involved will be reviewed and evaluated each year through the Annual Affirmative Action Plan update.

Student Program Affirmative Action Initiatives

Program 1: Increase Native American/Alaskan Native Enrollment.

Program 1 - Initiative A:

Expand outreach and recruitment.

- Completed in 2015/16 with ongoing, annual participation in Red Cliff Health Fair and Education Fair; LaCourte Oreilles Education Fair; Bad River Education and Family Night and Lac du Flambeau Education Fair.

Program 1 - Initiative B:

Expand participation in career awareness and recruiting events on campus.

- Completed in 2015/16 with expanded relationships with tribal leaders and targeted marketing strategies for Native American participation in campus events.

Program 1 - Methods of Evaluation

The College will track the number of attendees at outreach and recruitment activities by gathering data of attendees and participation. Each program initiative involved will be reviewed and evaluated each year through the Annual Affirmative Action Plan update.

Program 2: Improve disabled enrollment graduation rates.

Program 2 - Initiative A:

Improve consistency and increase awareness among staff of services and processes related to accommodations services.

Action Item	Responsibility	Timeline
Step 1: Identify opportunities to improve services through consistent, documented processes	Dean of Students and Accommodations Specialists	Fall 2015 - websites updated and training plan in progress.
Step 2: Prioritize process improvement and documentation opportunities	Dean of Students and Accommodations Specialists	Spring 2016 - communication and training plan is being developed - Rollout Fall 2017
Step 3: Develop communication plan and communicate to staff	Dean of Students and Accommodations Specialists	Fall 2017 Training of staff ongoing through Professional Development Plans

Program 2 - Initiative B:

Improve early alert process.

- Completed in 2015/16 with the development and implementation of a new early alert process; process developed in conjunction with the WITC Retention Team.

Program 2 - Methods of Evaluation

The number of students with a disability will be evaluated and the College will track the number of students with a disability through the applications process and data will be reviewed and evaluated each year through the Annual Affirmative Action Plan update.

Program 3: Female enrollment and graduation.

Program 3 - Initiative A:

Implement marketing and recruitment strategies targeted at female students in programs that are underrepresented.

- Completed in 2016/17 with the development and implementation of Manufacturing Revealed Events, Diva Tech Event at the Superior Campus, College Preview Days and Career Days -events vary by campus and frequency.

Program 3 - Initiative B:

Develop consistent processes, procedures & expectations within Student Affairs that supports female student success and enrollment as it relates to the Career Specialists, Counselors, and Admission Advisor positions.

- Completed in 2016/17 with the development and implementation of a communication plan for new roles and responsibilities; revised and consistent job roles and responsibilities that are reviewed annually.

Program 3 - Methods of Evaluation

The number of female students in programs that are underrepresented will be evaluated and the College will track the data through the application and enrollment processes and data will be reviewed and evaluated each year through the Annual Affirmative Action Plan update.

Program 4: Improve minority graduation rates.

Program 4 - Initiative A:

Improve early alert process.

- Completed in 2015/16 with the development and implementation of a new early alert process; process developed in conjunction with the WITC Retention Team.

Program 4 - Initiative B:

Develop consistent processes, procedures & expectations within Student Affairs that supports minority student enrollment and success as it relates to the Career Specialists, Counselors, and Admission Advisor positions.

Action Item	Responsibility	Timeline
Step 1: Identify and gather enrollment data to determine where student barriers or gaps exist in enrollment funnel	Deans of Students and Director of Marketing	Fall 2015 - completed
Step 2: Identify best practices and opportunities to improve enrollment and student support	Deans of Students and Director of Marketing	Spring 2016 - completed
Step 3: Develop revised and consistent job roles and responsibilities	Deans of Students, Director of Marketing, Human Resources	Fall 2017

Step 4: Develop and implement communication plan for new roles and responsibilities	Deans of Students, Director of Marketing, Human Resources	Spring 2018
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Program 4 - Methods of Evaluation

The number of minority students in programs that are underrepresented will be evaluated and the College will track the data through the application and enrollment processes and data will be reviewed and evaluated each year through the Annual Affirmative Action Plan update.

Section 2 - Diversity/Equity Activities for Culture

WITC maintains and ongoing emphasize an educational and work environment that reflects, appreciates and celebrates a diverse society. The College ensures a climate for the success of employees and students by appreciating the uniqueness he/she brings to the College. WITC annually strives to continue to balance individual occupational program enrollment percentages for students by race, sex and disability percentages with the general population. The College assures non-discrimination in career planning, counseling and placement services for students through annual review of processes and procedures. The Colleges continually analyzes and addresses employment of staff at the College to match availability percentages for race, sex and disability categories in the general population of the District. The College has created additional outreach to individuals with military service and veteran status.

Section 3 – Policy Changes (attached)

- G-112 Non-Discrimination/Non-Harassment Compliance Policy – updated 8/15/16
- G-113 Unlawful Discrimination/Harassment/Sexual Harassment/Sexual Misconduct/Sexual Violence Complaints Policy- updated 8/17/15
- G-113A Unlawful Discrimination/Harassment/Sexual Harassment/Sexual Misconduct/Sexual Violence Complaints Procedure - updated 8/17/15

Section 4 - Evaluation and Monitoring

Data included with each program; please see "Methods of Evaluation" in Section 1 associated with each program.

Section 5 – Data Analysis

No significant change in data since implementation of the Plan.

Attachment: Section 3 - Policy Changes



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- G-112 Non-Discrimination/Non-Harassment Compliance Policy – updated 8/15/16
- G-113 Unlawful Discrimination/Harassment/Sexual Harassment/Sexual Misconduct/Sexual Violence Complaints Policy – updated 8/17/15
- G-113A Unlawful Discrimination/Harassment/Sexual Harassment/Sexual Misconduct/Sexual Violence Complaints Procedure – updated 8/17/15

WISCONSIN INDIANHEAD TECHNICAL COLLEGE



ADMINISTRATIVE POLICY: G-112 & J-120

TITLE: Non-Discrimination/Non-Harassment Compliance

CROSS REFERENCE(S):

G-111 (Administrative Policy - Disability Accommodation)
G-111A (Administrative Procedure - Disability Accommodation)
G-113 & J-121 (Administrative Policy - Unlawful Discrimination/Harassment/USexual Harassment/USexual Misconduct/USexual Violence Complaints)
G-113A & J-121A & J-220A (Administrative Procedure - Unlawful Discrimination/Harassment/USexual Harassment/USexual Misconduct/USexual Violence Complaints)
J-220 (Administrative Policy - Student Relations)
Title VI and VII of the Civil Rights Act of 1964
Title IX of the Education Amendments of 1972, as amended
Section 504 of the Rehabilitation Act of 1973
Title II of The Americans with Disabilities Act of 1990, as amended
The Americans with Disabilities Act Amendments Act of 2008
Wisconsin Fair Employment Law, Section 111.31-39
1993 Wisconsin Act 427, effective May 7, 1994
Equal Pay Act of 1963, as amended
Age Discrimination in Employment Act
Higher Education Act of 1965, §485(f) (20 U.S.C. 1092 (f))
Clery Act, as amended, Sexual Violence Elimination Act (SaVE Act) as authorized by Violence Against Women Reauthorization Act
Unlawful Discrimination/Harassment/USexual Harassment/USexual Misconduct/USexual Violence Complaint Form (see the WITC Forms Database)

Wisconsin Indianhead Technical College (WITC) (College) does not discriminate on the basis of race, color, religion, sex, national origin, age, disability or status in any group protected by federal, state or local law in employment, admissions or its programs, services or activities in compliance with Title VI and VII of the Civil Rights Act of 1964 (Title VI, VII), Title IX of the Education Amendments of 1972 (Title IX) and Section 504 and Section 508 of the Rehabilitation Act of 1973 and Title II of The Americans with Disabilities Act of 1990, as amended (Section 504/Title II) and The Americans with Disabilities Act Amendments Act of 2008 (Amendments Act), Clery Act, as amended, Sexual Violence Elimination Act (SaVE Act) as authorized by Violence Against Women Reauthorization Act, and the Higher Education Act of 1965, §485(f) (20 U.S.C. 1092 (f)).

The Policy of Non-Discrimination/Non-Harassment Compliance is a key to the overall commitment of the College to equal employment and equal educational opportunity and directs the College in making decisions relating to the College facilities, employment of personnel, selection of educational materials, equipment, curriculum and regulations affecting students and placement of qualified minorities at all levels of employment when deficiencies exist through affirmative action and providing reasonable accommodations for students and employees with disabilities.

The following position has been designated to oversee compliance with federal and state statutory and regulatory requirements related to equal employment and equal educational opportunities including Title IX, Title VI, Title VII, Section 504, Section 508, Title II, Clery Act, as amended, Sexual Violence Elimination Act (SaVE Act) as authorized by Violence Against Women Reauthorization Act, the guidance supplied by Department of Education, Office of Civil Rights and to handle inquiries, investigations and resolve complaints regarding the College's equal opportunity and non-discrimination/non-harassment policies for students, employees and student/employee applicants: Vice President, Human Resources & Risk Management, Administrative Office, 505 Pine Ridge Drive, Shell Lake WI 54871, 715-468-2815 ext. 2225. Employees and students may also report complaints to law enforcement as appropriate.

To insure compliance with the intent of state laws and regulations and the guidance supplied by the Office of Civil Rights, procedures for resolving complaints/grievances have been adopted by the College.

Complaints of alleged acts of unlawful discrimination which are in violation of the non-discrimination/non-harassment policy under which the College operates shall be filed directly with the Vice President, Human Resources and Risk Management who has been designated the Equal Opportunity/Affirmative Action Officer and Title IX Coordinator for the College. All complaints or reports of alleged acts or charges will be handled under developed procedures that will include, but not be limited to, taking immediate action to eliminate the acts or actions in violation of the Policy, preventing its recurrence, addressing its effects, publishing a notice of non-discrimination, adopting and publishing complaint procedures and ensuring College employees are trained to respond to issues/complaints promptly and equitably.

Individuals who engage in unlawful discriminatory practices are subject to disciplinary action up to and including termination of employment or expulsion.

For more information on types of unlawful discrimination/harassment/sexual harassment/sexual misconduct/sexual violence examples, rights and responsibilities, and the complaint/grievance procedures, please contact the College's Vice President, Human Resources & Risk Management/Equal Opportunity/Affirmative Action Officer and Title IX Coordinator.

Reference: This policy requires Board approval per Wisconsin Technical College System Methods of Administration requirements and the regulations promulgated by the authority of Title VI and VII of the Civil Rights Act of 1964
Title IX of the Education Amendments of 1972, as amended
Section 504 of the Rehabilitation Act of 1973
Title II of The Americans with Disabilities Act of 1990, as amended
The Americans with Disabilities Act Amendments Act of 2008
Wisconsin Fair Employment Law, Section 111.31-39
1993 Wisconsin Act 427, effective May 7, 1994
Equal Pay Act of 1963, as amended
Age Discrimination in Employment Act
Higher Education Act of 1965, §485(f) (20 U.S.C. 1092 (f))
Clery Act, as amended, Sexual Violence Elimination Act (SaVE Act) as authorized by Violence Against Women Reauthorization Act

Questions regarding this policy should be directed to Human Resources.

Policy Adopted: February 19, 1976

Policy Revised: July 10, 1978
January 1, 2000
April 5, 2005
August 7, 2012 (incorporated J-111 & G-111)
August 12, 2014
July 28, 2015

Policy Reviewed: August 15, 2016



PRESIDENT
WISCONSIN INDIANHEAD TECHNICAL COLLEGE

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ADMINISTRATIVE POLICY: G-113 & J-121

TITLE: Unlawful Discrimination/Harassment/Sexual Harassment/ Sexual Misconduct/Sexual Violence Complaints

CROSS REFERENCE(S):

G-112 & J-120 (Administrative Policy - Non Discrimination/Non Harassment Compliance)
G-113A & J-121A & J-220A (Administrative Procedure - Unlawful Discrimination/Harassment/Sexual Harassment/Sexual Misconduct/Sexual Violence Complaints)
J-220 (Administrative Policy - Student Relations)
G-111 (Administrative Policy - Disability Accommodation)
G-111A (Administrative Procedure - Disability Accommodation)
Title VI and VII of the Civil Rights Act of 1964
Title IX of the Education Amendments Act of 1972, as amended
Section 504 and Section 508 of the Rehabilitation Act of 1973
Title II of The Americans with Disabilities Act of 1990, as amended
The Americans with Disabilities Act Amendments Act of 2008
Wisconsin Fair Employment Law, Section 111.31-39
1993 Wisconsin Act 427, effective May 7, 1994
Equal Pay Act of 1963, as amended
Age Discrimination in Employment Act
Higher Education Act of 1965, §485(f) (20 U.S.C. 1092 (f))
Clery Act, as amended, Sexual Violence Elimination Act (SaVE Act) as authorized by Violence Against Women Reauthorization Act
Unlawful Discrimination/Harassment/Sexual Harassment/Sexual Misconduct/Sexual Violence Complaint Form (see WITC Forms Database)

Wisconsin Indianhead Technical College (WITC) (College) prohibits and will not tolerate unlawful discrimination, harassment or sexual harassment/sexual misconduct/sexual violence including domestic violence, dating violence, and/or stalking by or against any student, employee, student/employee applicant, vendor/customer, anyone associated with WITC or other members of the public.

To Make a Claim of Unlawful Discrimination, Harassment, or Sexual Harassment/Sexual Misconduct/Sexual Violence:

Any student, employee, or student/employee applicant who believes that he/she has been unlawfully discriminated against or harassed or sexually harassed or a victim of sexual misconduct/sexual violence including domestic violence, dating violence, and/or stalking in violation of College policy is urged to report the incident.

The following position has been designated to oversee compliance with federal and state statutory and regulatory requirements related to equal employment and equal educational opportunities including Title VI and VII of the Civil Rights Act of 1964, Title IX of the Education Amendments Act of 1972, as amended, Section 504 and Section 508 of the Rehabilitation Act of 1973, Title 11 of The Americans with Disabilities Act of 1990, as amended, and The Americans with Disabilities Act Amendments Act of 2008, Clery Act, as amended, Sexual Violence Elimination Act (SaVE Act) as authorized by Violence Against Women Reauthorization Act, Higher Education Act of 1965, §485(f) (20 U.S.C. 1092 (f)) and the guidance supplied by Department of Education, Office of Civil Rights and to handle inquiries, investigations and resolve complaints regarding the College's equal opportunity and non-discrimination/non-harassment policies for students, employees and student/employee applicants: Vice President, Human Resources & Risk Management, Administrative Office, 505 Pine Ridge Drive, Shell Lake, WI 54871, (715) 468-2815, ext. 2225. Employees and students may also report complaints to any member of President's Cabinet or to law enforcement as appropriate. If any member of President's Cabinet is alleged to have engaged in unlawful discrimination/harassment/retaliation, the complaint must be filed directly with the President. If the President is alleged to have engaged in unlawful discrimination/harassment/retaliation, the complaint must be filed directly with the Board Chair. All allegations/complaints will be investigated promptly according to

College procedures and both the complainant and accused will be afforded equitable rights during the investigative process.

All complaints or reports of alleged acts or charges of unlawful discrimination/harassment/sexual harassment/sexual misconduct/sexual violence including domestic violence, dating violence, and/or stalking reported to the College will be handled under developed procedures that will include, but not be limited to, taking immediate action to eliminate the unlawful action, preventing its recurrence, addressing its effects, publishing a notice of non-discrimination/non-harassment/non-retaliation, adopting and publishing complaint procedures and ensuring College employees are trained to respond to issues/complaints promptly and equitably. Prompt and remedial action will be taken, if necessary, to ensure appropriate behavior in the academic/work environment.

Conduct or actions that arise out of a personal or social relationship that are not intended to have an unlawful discriminatory effect may or may not be viewed as a violation of this policy. WITC will determine whether such conduct constitutes a violation of this policy based on a review of the facts and circumstances of each situation.

For more information on types of unlawful discrimination/harassment/sexual harassment/sexual misconduct/sexual violence examples, rights, responsibilities and the complaint procedure, please contact the College's Vice President, Human Resources & Risk Management/Equal Opportunity/Affirmative Action Officer and Title IX Coordinator.

Reference: This policy requires Board approval per Wisconsin Technical College System Methods of Administration requirements and the regulations promulgated by the authority of Title VI and VII of the Civil Rights Act of 1964
Title IX of the Education Amendments of 1972, as amended
Section 504 of the Rehabilitation Act of 1973
Title II of The Americans with Disabilities Act of 1990, as amended
The Americans with Disabilities Act Amendments Act of 2008
Higher Education Act of 1965, §485(f) (20 U.S.C. 1092 (f))
Clery Act, as amended, Sexual Violence Elimination Act (SaVE Act) as authorized by Violence Against Women Reauthorization Act

Questions regarding this policy should be directed to Human Resources.

Policy Adopted: April 19, 1982

Policy Reviewed: November 16, 2010
August 15, 2016

Policy Revised: October 3, 1994
January 1, 2000
April 5, 2005
March 12, 2007 (Revisions Provided by Legal Counsel)
August ?, 2012
August 19, 2013 (Revisions reviewed by Legal Counsel)
August 18, 2014
August 17, 2015



PRESIDENT
WISCONSIN INDIANHEAD TECHNICAL COLLEGE

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ADMINISTRATIVE PROCEDURE: G-113A & J-121A & J-220A

TITLE: Unlawful Discrimination/Harassment/Sexual Harassment/ Sexual Misconduct/Sexual Violence Complaints

CROSS REFERENCE(S):

G-112 & J-120 (Administrative Policy - Non Discrimination/Non Harassment Compliance)
G-113 & J-121 (Administrative Policy - Unlawful Discrimination/Harassment/Sexual Harassment/Sexual Misconduct/Sexual Violence Complaints)
J-220 (Administrative Policy - Student Relations)
G-111 (Administrative Policy - Disability Accommodation)
G-111A (Administrative Procedure-Disability Accommodation)
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Title II of The Americans with Disabilities Act of 1990, as amended
The Americans with Disabilities Act Amendments Act of 2008
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Unlawful Discrimination/Harassment/Sexual Harassment/Sexual Misconduct/Sexual Violence Complaint Form (see WITC Forms Database)

Any student, employee, or student/employee applicant who believes that he/she has been unlawfully discriminated against or harassed or sexually harassed or a victim of sexual misconduct/sexual violence including domestic violence, dating violence, and/or stalking in violation of College policy is urged to report the incident.

The following position has been designated to oversee compliance with federal and state statutory and regulatory requirements related to equal employment and equal educational opportunities including Title VI and VII of the Civil Rights Act of 1964, Title IX of the Education Amendments Act of 1972, as amended, Section 504 and Section 508 of the Rehabilitation Act of 1973, Title II of The Americans with Disabilities Act of 1990, as amended, and The Americans with Disabilities Act Amendments Act of 2008, Clery Act, as amended, Sexual Violence Elimination Act (SaVE Act) as authorized by Violence Against Women Reauthorization Act, Higher Education Act of 1965, §485(f) (20 U.S.C. 1092 (f)) and the guidance supplied by Department of Education, Office of Civil Rights and to handle inquiries, investigations and resolve complaints regarding the College's equal opportunity and non-discrimination/non-harassment policies for students, employees and student/employee applicants: Vice President, Human Resources & Risk Management, Administrative Office, 505 Pine Ridge Drive, Shell Lake, WI 54871; (715) 468-2815 ext. 2225. Employees and students may also report complaints to any member of President's Cabinet or to law enforcement as appropriate. If any member of President's Cabinet is alleged to have engaged in unlawful discrimination/harassment/retaliation, the complaint must be filed directly with the President. If the President is alleged to have engaged in unlawful discrimination/harassment/retaliation, the complaint must be filed directly with the Board Chair. All allegations/complaints will be investigated promptly according to College procedures and both the complainant and accused will be afforded equitable rights during the investigative process.

All complaints or reports of alleged acts or charges of unlawful discrimination/harassment/sexual harassment/sexual misconduct/sexual violence including domestic violence, dating violence, and/or stalking reported to the College will be handled under developed procedures that will include, but not be limited to, taking immediate action to eliminate the unlawful action, preventing its recurrence, addressing its effects, publishing a notice of non-discrimination/non-harassment/non-retaliation, adopting and publishing grievance procedures and ensuring College employees are trained to respond to issues/complaints promptly and equitably. The procedure is available for complaints by students, employees and student/employee applicants concerning alleged unlawful discrimination/ harassment/sexual harassment/sexual misconduct/sexual violence including domestic violence, dating violence, and/or stalking as those terms are described below.

WITC Vice President, Human Resources & Risk Management serves as the Equal Opportunity/ Affirmative Action Officer and Title IX Coordinator and the central intake point for complaints of unlawful discrimination/ harassment/sexual harassment/sexual misconduct/sexual violence including domestic violence, dating violence, and/or stalking. All charges of unlawful discrimination/ harassment/sexual harassment/sexual misconduct/sexual violence including domestic violence, dating violence, and/or stalking will be investigated according to College procedure by the Vice President, Human Resources & Risk Management (or designee) or a supervised investigation will be delegated to other trained, responsible members of President's Cabinet and/or outside legal counsel as appropriate.

Definitions

1. Student means a person who has gained admission. Admission means selection for part-time, full-time, special, associate, transfer, exchange, or any other enrollment, membership, or matriculation in or at an education program or activity operated by a recipient.
2. Unlawful discrimination shall mean a difference in treatment in any employment related action, service, program, course, or facility of WITC on the basis of race, color, religion, sex, national origin, age, disability or status in any group protected by federal, state or local law in employment, admissions or its programs, services or activities. Unlawful discrimination may be in the form of harassment such as:
 - a. Unsolicited and repeated derogatory epithets, derogatory statements or gestures made to a person because of his/her protected status.
 - b. Any attempt to penalize or punish a person because of his/her protected status.
3. Sexual Harassment means unwelcome sexual advances, unwelcome physical contact of a sexual nature, unwelcome request for sexual favors, and other verbal or physical conduct of a sexual nature (including, but not limited to, deliberate or repeated unsolicited gestures or comments, or the deliberate or repeated display of offensive, sexually graphic materials, not necessary for educational purposes), when:
 - a. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's status as a student or employee;
 - b. Submission to or rejection of such conduct by an individual is used as a basis for enrollment, rating, or grading of a student or any employment related action for an employee;
 - c. Such conduct has the purpose or effect of substantially interfering with an individual's academic or work progress, or creating an intimidating, hostile, or offensive academic or working environment.
4. Sexual misconduct/sexual violence is also sexual harassment and as such is prohibited and could include sexual acts against a person's will or where a person is incapable of giving consent. The term "sexual assault" means an offense classified as a forcible or nonforcible sex offense under the uniform crime reporting system of the Federal Bureau of Investigation.
5. "Domestic violence" includes asserted violent misdemeanor and felony offenses committed by the victim's current or former spouse, current or former cohabitant, person with whom the individual shares a child, person similarly situated under domestic or family violence law, or anyone else protected under domestic or family violence law.
6. "Dating violence" means violence by a person who has been in a romantic or intimate relationship with the victim. Whether there was such relationship will be gauged by its length, type, and frequency of interaction.

7. "Stalking" means a pattern of repeated and unwanted attention, harassment, contact, or other action directed at a specific person that could cause a reasonable person to feel fear or suffer substantial emotional stress.

Complaint Procedure

1. NOTIFICATION OF COMPLAINT

- a. Any applicant, student, employee, or citizen requesting services from WITC who believes he/she has experienced or observed a violation of this policy or procedure at WITC may file a report with the Vice President, Human Resources & Risk Management at the following address: WITC Administrative Office, 505 Pine Ridge Drive, Shell Lake, WI 54871; (715) 468-2815, ext. 2225.
- b. The complaint report should be in writing, to the Vice President, Human Resources & Risk Management. The report should detail the facts and circumstances which are the basis for the complaint and identify the individual(s) at WITC responsible for the alleged violation and the policy, procedure, or practice that has been violated. Whenever possible, the "Unlawful Discrimination/ Harassment/ Sexual Harassment/Sexual Misconduct/Sexual Violence Complaint Form" should be used to provide the information requested. The complainant and the respondent will be advised of the College policy and procedures when filing a complaint.
- c. In accordance with Wisconsin law, a complaint alleging discrimination must be filed within 300 days of the alleged violation; however, a more immediate reporting of the incident will facilitate a prompt and thorough investigation of the facts and circumstances involved.
- d. The filing of a report with the College does not restrict a person's right to seek redress through avenues outside of the College.
- e. Retaliatory action against anyone filing a legitimate report for any type of unlawful discrimination/ harassment, including sexual harassment/sexual misconduct/sexual violence, is strictly prohibited.

2. INVESTIGATION

Upon receipt of a complaint and/or a Unlawful Discrimination/Harassment/Sexual Harassment/Sexual Misconduct/Sexual Violence Complaint Form, the Vice President, Human Resources & Risk Management will authorize an investigation of the incident(s) in question and seek prompt and equitable resolution of the matter. The specific steps of the investigation will vary based on the nature of the allegations and other factors; however, the College's inquiry will be prompt, thorough and impartial. Within ten (10) working days or school days from the receipt of the complaint or as soon as is administratively possible, the Vice President, Human Resources & Risk Management will initiate the following as needed:

- a. Take steps to ensure the safety of the offended parties as necessary.
- b. Conduct individual meetings with the person who filed the complaint and with other persons identified in the complaint as being either witnesses to or responsible for the alleged violation(s).
- c. Conduct group meetings with the principal parties involved in the incident(s) in question, as necessary.
- d. Attempt to resolve the matter to the mutual satisfaction of the principal parties involved. The resolution actions may include advisement, investigation, observation, sensitivity training, accommodations, disciplinary action up to and including termination or expulsion, and reporting criminal activity and/or specific counseling for behavior modification. If the matter cannot be resolved to the mutual satisfaction of the principal parties involved, the individual will have the option to proceed to an appeal hearing with the Board of Trustees (Board). The appeal hearing would be in accordance with the Appeal Process (section 4).

3. **FINDINGS**

If there is a preponderance of evidence to believe that a violation(s) has occurred, the College will take appropriate action. Individuals discriminating against students or employees will be subject to discipline under appropriate WITC policies. The College will also take other necessary corrective action to remedy any instances or effects where unlawful discrimination/ harassment/sexual misconduct/sexual violence is determined to have occurred. Notice of the action will be sent to the principal parties involved.

4. **APPEAL PROCESS**

Within five (5) working days or school days following notification of the action taken by the College, following the investigation and findings, either of the principal parties involved may file an appeal with the WITC President for a hearing with the Board. The Board will, if practical, consider the request for appeal at its next regularly-scheduled meeting (but not sooner than 30 days or later than 60 days from receipt of the request for appeal), and may deny the appeal, overturn the original decision, or remand the matter for a partial or complete review, citing specific matters to be considered. The disposition of the Board is final and there shall be no further appeal within the College of the matter.

5. **RESTRICTION**

a. Action relating to employment and/or enrollment should not be taken for or against a person until a report of unlawful discrimination/harassment has been resolved, unless such action is deemed necessary to the well-being or safety of the people involved in the action or to the function of the College or when such action/decision is part of the usual business of the College.

b. Inasmuch as this review process represents an administrative inquiry into the facts and circumstances surrounding a report of unlawful discrimination/harassment/sexual harassment/sexual misconduct/sexual violence, the use of legal counsel and/or representation is not permitted.

c. However, nothing in these procedures will preclude an employee's or student's right to seek other avenues of redress outside of the College including a complainant's right to file a criminal complaint, as appropriate.

6. **DOCUMENTATION**

A record of all complaints must be maintained and forwarded to the College's Vice President, Human Resources & Risk Management for reporting purposes in compliance with federal and state laws.

WITC will submit a report by September 1st to the Board and the Wisconsin Technical College System Board specifying the number of complaints received in the previous school year and the disposition of each such complaint.

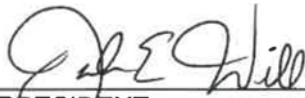
Reference: *This policy requires Board approval per Wisconsin Technical College System Methods of Administration requirements and the regulations promulgated by the authority of Title VI and VII of the Civil Rights Act of 1964 Title IX of the Education Amendments of 1972, as amended Section 504 of the Rehabilitation Act of 1973 Title II of The Americans with Disabilities Act of 1990, as amended The Americans with Disabilities Act Amendments Act of 2008 Higher Education Act of 1965, §485(f) (20 U.S.C. 1092 (f)) Clergy Act, as amended, Sexual Violence Elimination Act (SaVE Act) as authorized by Violence Against Women Reauthorization Act*

Questions regarding this policy should be directed to Human Resources.

Policy Adopted: February 19, 1976

Policy Reviewed: November 16, 2010

Policy Revised:	July 10, 1978	April 19, 1982	July 18, 1990
	February 4, 1991	March 1, 1991	February 15, 1994
	January 1, 2000	March 4, 2001	March 4, 2002
	April 5, 2005	July 1, 2006	January 9, 2007 (revisions provided by legal counsel)
	August ?, 2012		
	August 19, 2013 (revisions provided by legal counsel)		
	August 18, 2014		
	August 17, 2015		



PRESIDENT
WISCONSIN INDIANHEAD TECHNICAL COLLEGE