



Equal Employment Opportunity and Affirmative Action Plan 2022

JUNE 14

WATERLOO COMMUNITY SCHOOL DISTRICT

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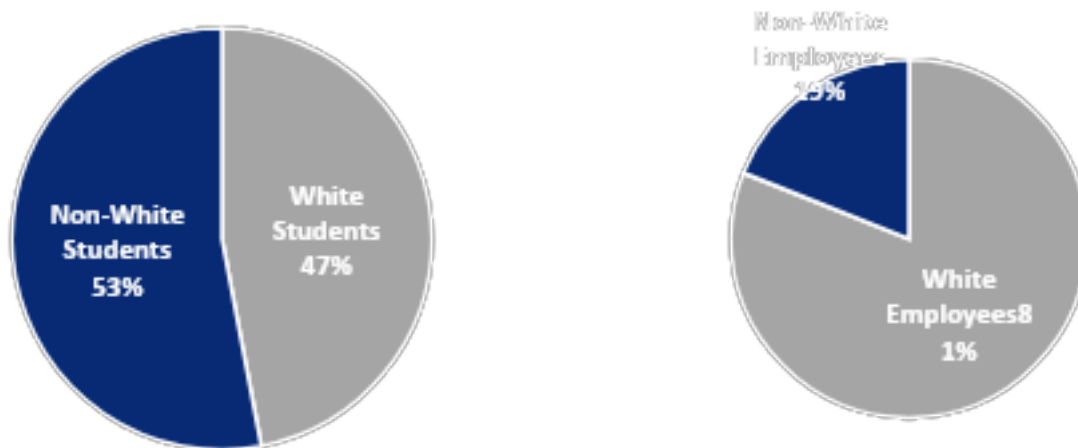
Introduction

The Equal Employment Opportunity and Affirmative Action Plan reflects the Waterloo Community School District's (WCSD) efforts to address existing workforce imbalances and strategies for the realization of our goals. The foundation of the District's commitment to affirmative action is its belief that all students in an educational environment are best served through a diverse workforce. The WCSD must provide educational experiences for students and staff that enhance a respect and appreciation for diversity in the learning community.

District Context

The WCSD serves over 10,000 students each year and employs 851 full-time equivalent professional employees and 558 full-time equivalent support staff. Like many districts around the nation, WCSD has a much more racially diverse student population than is represented in the educator population (see Figure 1).

FIGURE 1. PERCENTAGE OF WHITE AND NON-WHITE STUDENTS AND EMPLOYEES 2019-2020



The Importance of a Diverse Teaching Workforce

A large body of research demonstrates that diversity in schools, including racial diversity among teachers, can provide significant benefits to students. However, the current demographic makeup of the teacher workforce is overwhelmingly white and female. According to the National Center for Educational Statistics (2016), 80% of teachers in public schools are white compared to 49% of students. Additionally, about 77% of teachers are women, compared to about half of students. When considering gender in addition to race,

black males only make up 2% of the teaching workforce. The lack of a diverse educator workforce has significant implications for students' experiences and outcomes.

Improving teacher diversity benefits all students. Greater racial match between teachers and students has been found to be associated with:

- Higher achievement (Favero and Molina 2018; Yarnell and Bohrnstedt 2018; Gershenson, Lindsay, Hart, and Papageorge 2017; Egalite, Kisida, and Winters 2015; Hanushek et al. 2005; Clewell et al. 2005; Dee 2004, 2005).
- More placements for black students into gifted programs (Grissom 2015; Meier and Stewart 1992).
- Greater college enrollment and fewer student absences (Holt and Gershenson 2017).
- Fewer suspensions for black students (Cheng 2017; Lindsey and Hart 2017; Holt and Gershenson 2017).
- More positive teacher perceptions and reduced likelihood of dropout for black students (Ehrenberg and Brewer 1995; Bates and Glick 2013; Gershenson et al. 2017).

Research suggests that teachers of color are more likely to have high expectations of students of color, are less likely to be biased in academic or behavior assessments, and can develop more trusting relationships with students, especially those whom they share a cultural background. In addition to these benefits, improving the diversity of the teaching workforce can help close the achievement gap.

Despite the benefits of teacher diversity, the educator workforce is still overwhelmingly homogeneous. One report suggests that the number of potential teachers of color decreases at multiple points in the teacher pipeline. To increase the diversity of the teacher workforce, schools must do more, starting with preparation and completion, to recruitment and selection, and then placement and retention. Making changes at all these points will help schools meaningfully increase diversity.

About the Equal Opportunity Employment and Affirmative Action Plan

State and federal laws prohibit discrimination in employment based on age, race, creed, color, sex, marital status, national origin, religion, or disability. Iowa law requires each school district, area education agency, and community college to develop affirmative action standards. This program has been developed to meet the requirements of Iowa Code Section 19B. The purpose of this plan is to ensure that recruitment, appointment, and promotion of all persons in all job classifications will occur without discrimination on the basis of race, creed, color, religion, national origin, gender, age, marital status, sexual orientation, gender identity, veteran status, disability, or socioeconomic status.

This report (1) details the current racial, gender, and disability diversity of teachers, staff, and administrators in the Waterloo Schools, (2) describes results from an analysis examining applicant flow and labor market, (3) provides measurable goals and activities to achieve equal employment opportunity. Included in the appendices are Waterloo School's non-discrimination statement, equal employment opportunity statement, affirmative action policy statement and supportive board policies that are related to equal employment opportunity, non-discrimination, and affirmative action.

Identification of Coordinator

Kingsley Botchway II, Chief Officer of Human Resources and Equity, is the Affirmative Action Officer. It is Mr. Botchway's responsibility to complete the EEO/AA plan and update as required. The Equity Committee is also used to obtain systematic input from its members for the EEO/AA plan.

Administrative Statement

The Waterloo Community School District promotes equal employment and affirmative action to attain a workforce that is representative of the ethnic and gender diversity of our learning community. The Office of the Superintendent intends to provide the resources, support and leadership to ensure that all populations are proportionately represented in our schools to the fullest extent possible. When this is accomplished, all of our students will be better served by having positive role models from our diverse workforce to foster positive attitudes toward the differences and similarities displayed by all persons they will encounter as adults.

To assure implementation of this Equal Employment Opportunity/Affirmative Action Plan, we will see that:

- Persons are recruited, hired, and promoted for all positions without regard to age, race, religion, color, national origin, gender, marital status, disability, creed, sexual orientation, and gender identity. Placement decisions are based solely on applicant qualifications for the position being filled.
- Equal employment opportunity shall apply to all personnel practices and procedures. All programs and activities are also administered without regard to age, race, religion, color, national origin, gender, marital status, disability, creed, sexual orientation, and gender identity.

The Board of Education and I all have a strong commitment to equal opportunity and affirmative action. Your continued assistance and support in attaining this objective is expected and appreciated.



Dr. Jane Lindaman, Superintendent

Workforce Analysis

The workforce analysis shows the racial and gender composition of the District’s staff. The workforce analysis is a necessary first step for determining where underrepresentation exists and for establishing numerical goals.

Staff Statistics by Gender 2019-20

	Gender			
	Male		Female	
	Count	%	Count	%
District Staff	365	21.30%	1349	78.70%
Administrators	7	58.33%	5	41.67%
Principals	10	52.63%	9	47.37%
Assistant Principals	10	62.50%	6	37.50%
Elementary Classroom Teachers	33	8.94%	336	91.06%
Secondary Classroom Teachers	126	38.18%	204	61.82%
Special Education Teachers	34	21.66%	123	78.34%
Guidance and Counseling Teachers	4	12.90%	27	87.10%
Librarians and Media Specialists	0	0.00%	13	100.00%
Other Professional Staff	40	32.00%	85	68.00%
Paraeducators	35	9.56%	331	90.44%
Clerical and Secretarial Staff	0	0.00%	64	100.00%
Service Workers	45	23.56%	146	76.44%
Skilled Craft Workers	21	100.00%	0	0.00%

Total Staff: 1714

Staff Statistics by Gender 2018-19

	Gender			
	Male		Female	
	Count	%	Count	%
District Staff	339	21.79%	1217	78.21%
Administrators	7	63.64%	4	36.36%
Principals	10	55.56%	8	44.44%
Assistant Principals	10	62.50%	6	37.50%
Elementary Classroom Teachers	30	9.04%	302	90.96%
Secondary Classroom Teachers	116	38.80%	183	61.20%
Special Education Teachers	31	20.95%	117	79.05%
Guidance and Counseling Teachers	4	13.33%	26	86.67%
Librarians and Media Specialists	0	0.00%	13	100.00%

Other Professional Staff	39	32.50%	81	67.50%
Paraeducators	30	9.71%	279	90.29%
Clerical and Secretarial Staff	0	0.00%	58	100.00%
Service Workers	44	23.91%	140	76.09%
Skilled Craft Workers	18	100.00%	0	0.00%
				Total Staff: 1556

Staff Statistics by Race/Ethnicity 2019-20

	Race/Ethnicity											
	White		African American/ Black		Hispanic/ Latino		Asian		American Indian/ Alaska Native		Native Hawaiian /Pacific Islander	
District Staff	1381	80.57%	271	15.81%	34	1.98%	22	1.28%	3	0.18%	3	0.18%
Administrators	9	75.00%	3	25.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Principals	14	73.68%	5	26.32%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Assistant Principals	8	50.00%	7	43.75%	1	6.25%	0	0.00%	0	0.00%	0	0.00%
Elementary Classroom Teachers	337	91.33%	24	6.50%	6	1.63%	1	0.27%	1	0.27%	0	0.00%
Secondary Classroom Teachers	307	93.03%	13	3.94%	6	1.82%	3	0.91%	0	0.00%	1	0.30%
Special Education Teachers	150	95.54%	3	1.91%	2	1.27%	2	1.27%	0	0.00%	0	0.00%
Guidance and Counseling Teachers	24	77.42%	5	16.13%	1	3.23%	1	3.23%	0	0.00%	0	0.00%
Librarians and Media Specialists	12	92.31%	1	7.69%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Other Professional Staff	73	58.40%	32	25.60%	9	7.20%	10	8.00%	0	0.00%	1	0.80%
Paraeducators	238	65.03%	120	32.79%	4	1.09%	2	0.55%	2	0.55%	0	0.00%
Clerical and Secretarial Staff	46	71.88%	17	26.56%	1	1.56%	0	0.00%	0	0.00%	0	0.00%
Service Workers	144	75.39%	39	20.42%	4	2.09%	3	1.57%	0	0.00%	1	0.52%
Skilled Craft Workers	19	90.48%	2	9.52%	0	0.00%	0	0.00%	0	0.00%	0	0.00%

	Race/Ethnicity Totals		
	Position Total	Non-White Employees Total	
		Count	%
District Staff	1714	333	19.43%
Administrators	12	3	25.00%
Principals	19	5	26.32%
Assistant Principals	16	8	50.00%
Elementary Classroom Teachers	369	32	8.67%
Secondary Classroom Teachers	330	23	6.97%

Special Education Teachers	157	7	4.46%
Guidance and Counseling Teachers	31	7	22.58%
Librarians and Media Specialists	13	1	7.69%
Other Professional Staff	125	52	41.60%
Paraeducators	366	128	34.97%
Clerical and Secretarial Staff	64	18	28.13%
Service Workers	191	47	24.61%
Skilled Craft Workers	21	2	9.52%

Staff Statistics by Race/Ethnicity 2018-19

	Race/Ethnicity											
	White		African American/ Black		Hispanic/ Latino		Asian		American Indian/ Alaska Native		Native Hawaiian/ Pacific Islander	
District Staff	1263	81.17%	240	15.42%	28	1.80%	20	1.29%	3	0.19%	2	0.13%
Administrators	8	72.73%	3	27.27%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Principals	14	77.78%	4	22.22%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Assistant Principals	8	50.00%	7	43.75%	1	6.25%	0	0.00%	0	0.00%	0	0.00%
Elementary Classroom Teachers	307	92.47%	21	6.33%	3	0.90%	0	0.00%	1	0.30%	0	0.00%
Secondary Classroom Teachers	280	93.65%	12	4.01%	5	1.67%	2	0.67%	0	0.00%	0	0.00%
Special Education Teachers	143	96.62%	2	1.35%	1	0.68%	2	1.35%	0	0.00%	0	0.00%
Guidance and Counseling Teachers	23	76.67%	5	16.67%	1	3.33%	1	3.33%	0	0.00%	0	0.00%
Librarians and Media Specialists	12	92.31%	1	7.69%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Other Professional Staff	70	58.33%	30	25.00%	9	7.50%	10	8.33%	0	0.00%	1	0.83%
Paraeducators	202	65.37%	100	32.36%	3	0.97%	2	0.65%	2	0.65%	0	0.00%
Clerical and Secretarial Staff	41	70.69%	16	27.59%	1	1.72%	0	0.00%	0	0.00%	0	0.00%
Service Workers	139	75.54%	37	20.11%	4	2.17%	3	1.63%	0	0.00%	1	0.54%
Skilled Craft Workers	16	88.89%	2	11.11%	0	0.00%	0	0.00%	0	0.00%	0	0.00%

	Race/Ethnicity Totals		
	Position Total	Non-White Employees Total	
		Count	%
District Staff	1556	293	18.83%
Administrators	11	3	27.27%
Principals	18	4	22.22%
Assistant Principals	16	8	50.00%

Elementary Classroom Teachers	332	25	7.53%
Secondary Classroom Teachers	299	19	6.35%
Special Education Teachers	148	5	3.38%
Guidance and Counseling Teachers	30	7	23.33%
Librarians and Media Specialists	13	1	7.69%
Other Professional Staff	120	50	41.67%
Paraeducators	309	107	34.63%
Clerical and Secretarial Staff	58	17	29.31%
Service Workers	184	45	24.46%
Skilled Craft Workers	18	2	11.11%

Employees with Disabilities

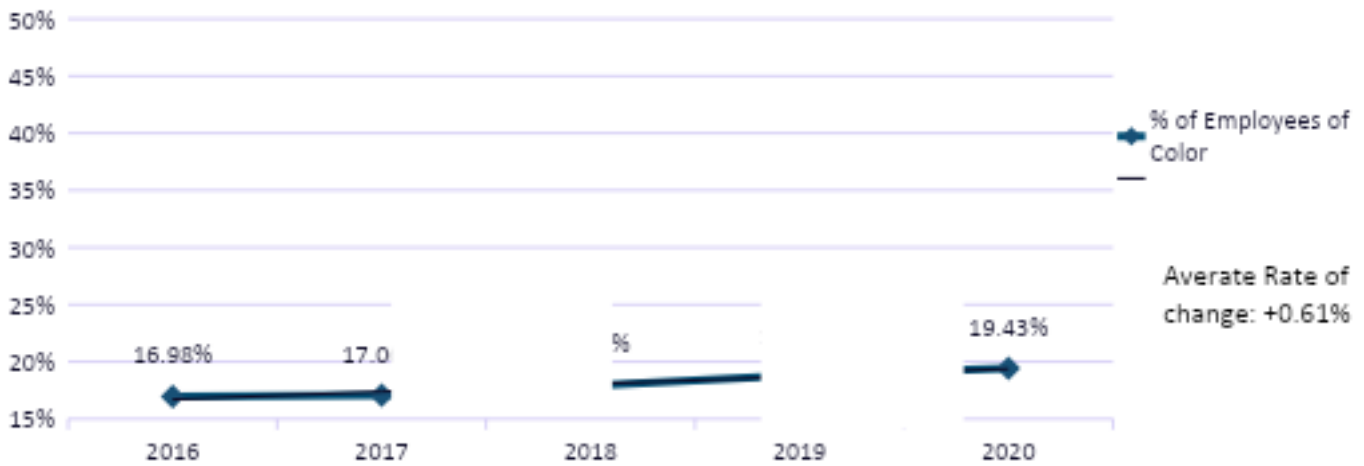
For the purposes of confidentiality, we will be reporting only total numbers for this employee group per IAC 95.5(3) recommendation. Overall, the district employs **15 individuals** receiving accommodations or working with restrictions in 2019-2020. They represent .87% of our employee population. Starting with this year’s AA/EEO report, this number will be tracked and updated with each fiscal year and trend data will be reported alongside other employee groups.

Summary of Staff Diversity Statistics

The District staff is composed of 79% females and 21% of males. Females appear to be underrepresented in administrators (42%), principals (47%), assistant principals (38%), and skilled craft workers (0%). Males are underrepresented in nearly every job category except administrators (58%), principals (52%), assistant principals (63%), and skilled craft workers (100%). Additionally, secondary teachers have a higher percentage of males (38%) compared to elementary teachers (9%).

The District staff is composed of 81% White, 16% Black, 2% Hispanic, 1% Asian, and less than one percent American Indian or Alaska Native and Native Hawaiian or Pacific Islander employees. Overall, non-white employees are underrepresented in District staff. There is a higher percentage of Black employees as administrators (25%), principals (26%), and assistant principals (44%) compared to as elementary teachers (7%), secondary teachers (4%), and special education teachers (2%). Hispanic educators are underrepresented in all of the job categories, notably only about 2% of teachers are Hispanic. This percentage is even less for Asian educators where less than 1% are teachers. Looking at our 5 year trend, there has been an overall increase in staff diversity, though at a slow rate on average.

FIGURE 2. STAFF DIVERSITY COMPOSITION 5 YEAR TREND



Applicant Flow

The percentage of new hires by gender and race are representative of the application pool, meaning that the percentage of applicants from each group matches the percentage of new hires. However, both the applications and new hire demographic are not reflective of the student population. The District hired 43% of the total White applicant pool, slightly higher than 41% of the Black applicant pool and then the 29% of Hispanic applicants hired. In order to increase teacher diversity, both the application pool of nonwhite applications and the percentage at which these applicants are hired must be increased.

	Applications ⁺		New Hires		% of Applicants Hired
	Count	%	Count	%	
Gender					
Male	97	19.28%	44	22.00%	45.36%
Female	406	80.72%	156	78.00%	38.42%
Race/Ethnicity					
White	355	74.42%	151	75.50%	42.54%
Black	95	19.92%	39	19.50%	41.05%
Hispanic	24	5.03%	7	3.50%	29.17%
Asian	1	0.21%	2	1.00%	200.00% [±]
American Indian or Alaska Native	1	0.21%	1	0.50%	100.00%
Native Hawaiian or Pacific Islander	1	0.21%	0	0.00%	0.00%
Non-White	122	25.58%	49	24.50%	40.16%
Applicants Total					
Totals	636 [*]		200		31.44%

⁺ Applications include current employees applying for openings

^{*} 145 Applicants did not report race/ethnicity and 133 Applicants did not report gender

‡ Applicants can opt to report Gender, Race/Ethnicity. New Hires are offered the opportunity to self-identify at orientation and this is preferred, however if an employee declines other employment records or observer identification is used per EEO reporting instructions.

Blackhawk Labor Statistics 5-Year Estimate

WCSD utilized the Iowa Workforce American Community Survey Data Tool to examine and compare the makeup of the potential workforce. The non-white population in Blackhawk county is 13%, compared to 19% of non-white district employees. There is a 50/50 gender breakdown in Blackhawk county, whereas females are overwhelmingly represented in District staff in almost all job categories. Additionally, about 9% of the Blackhawk population identifies as having a disability compared to less than 1% of the total Waterloo staff population.

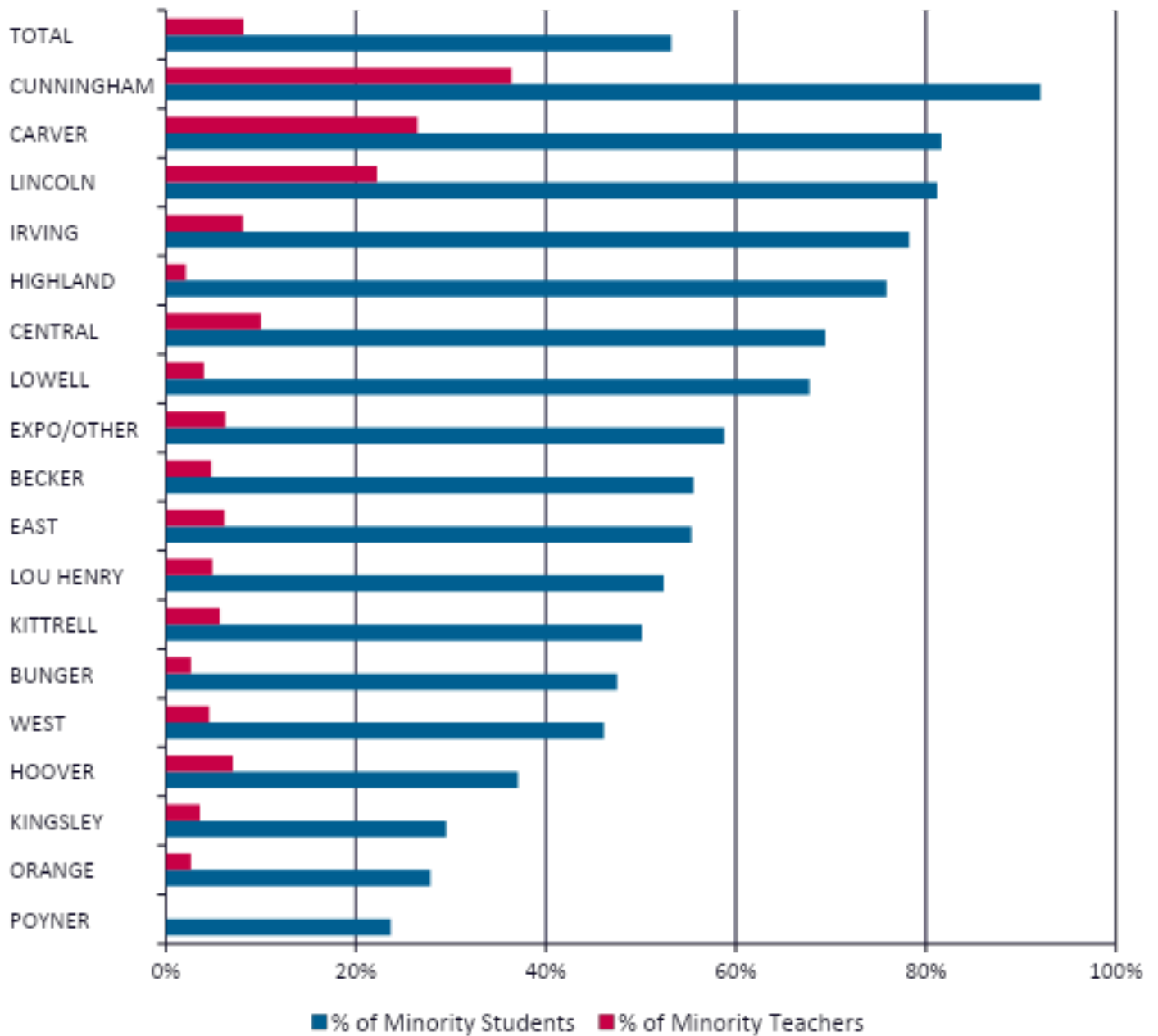
	Population Total		Labor Force Participation Rate
	Count	%	%
Gender			
Male	39230	50.02%	85.20%
Female	39204	49.98%	79.90%
Race/Ethnicity			
White	92921	86.62%	68.40%
Black	8680	8.09%	64.00%
Hispanic	3688	3.44%	78.70%
Asian	2132	1.99%	61.90%
American Indian or Alaska Native	413	0.39%	70.90%
Native Hawaiian or Pacific Islander	232	0.22%	87.10%
Some other race	1537	1.43%	74.50%
Two or more races	1347	1.26%	64.80%
Disability			
Those With Disabilities	7,307	9.31%	48.80%
Totals*	107262		68.00%

*The total population is reported for 16 years and over. Race/ethnicity is also reported for 16 years and over. Gender and disability are reported for 20 to 64 years.

Student to Teacher Diversity Mismatch

There is a significant mismatch between the percentage of minority students and teachers in every school in the District. Overall, there is only 8% of minority teachers compared to 53% of minority students.

FIGURE 3. TEACHER/STUDENT DIVERSITY MISMATCH 2019-20



Quantitative Goals

Numerical hiring goals must be established for each major job category where underrepresentation exists. The goals should be seen as reasonable aspirations for correcting imbalances in the District's workforce. They will not be treated as rigid and inflexible quotas that must be met. The goals will not cause any group of applicants to be excluded from the hiring process.

The factors taken into consideration when developing these goals are:

- The numbers and percentages from the work force analysis
- The number of projected vacancies in the job categories
- The availability of qualified persons from underrepresented groups within the relevant labor market
- The demographic makeup of the student population
- The demographic makeup of the population of Waterloo and surrounding Blackhawk County.

Numerical Goals and Timetables

Short Term Goals

1. Increase the number of applications from applicants of color from 20% to 30% by 2022-2023.
2. Increase the percentage of Hispanic teachers from 2% to 5% by 2022-2023.
3. Increase the overall percentage of teachers of color from 8% to 12% by 2022-2023.
4. Increase the percentage of non-white administrators from 34% to 45% by 2022-2023.

Long Term Goals

1. Increase the overall percentage of male teacher at the elementary level from 9% to 30% by 2025-2026.
2. Increase the overall percentage of special education teachers of color from 2% to 7% by 2025-2026.
3. Increase the percentage of female skilled craft workers from 0% to 5% by 2025-2026.
4. Increase the percentage of administrators of color from 34% to 50% by 2025-2026.

Qualitative Analysis and Goals

The qualitative analysis is a review of employment policies and practices to determine if and where those policies and practices tend to exclude, disadvantage, restrict or result in adverse impact on the basis of racial/ethnic origin, gender, or disability. The goal of the District is to prevent any such occurrences.

Recruitment and Hiring

Recruitment practices and policies are annually evaluated by the Chief Officer of Human Resources and Equity. Goals are set, annually reviewed, and new goals established based on the hiring needs of the District and outcome of the study. These goals are set as a result of examining our quantitative employee data, the local employment data, and our application data and identifying underrepresentation based on race/ethnicity, gender, and disability overall in specific job categories of interest. The qualitative goals established for this plan include:

- Continue to work with IASPA (Iowa Association of School Personnel Administrators) to analyze related issues and utilize a UEN minority recruitment consortium.
- Enhance relationships with more HBCU institutions.
- Participate in National Minority Teacher Recruitment Fair
- Provide support to identify future educators (collaborations with the University of Northern Iowa and Wartburg College)
- Attend local community job fairs and engage other administrators and mentor teachers in attendance.
- Recruit existing staff to participate in recruitment initiatives.
- Ensure a person of color is represented on every hiring committee.
- Implement a means of assessing interview committee implicit bias.
- Examine & refine our hiring policies and procedures in depth to ensure they are conducive to furthering diversity, inclusion, and equity.
- Further examine the historical and contemporary factors that inform recruitment and retention of teachers of color.
- Look at how our hiring and recruitment process may disadvantage or discourage applicants with disabilities, and examining how we can create a better work environment for individuals with disabilities and LGBTQ employees.

Retention

Retention of employees was considered as a possible source of underrepresentation in addition to hiring policies and practices. The retention of staff members is monitored annually to assess the District's progress in this area. Exit surveys provide insight into the factors and reasons behind why staff leave the District. The goal of this survey is to better understand why staff leave and to identify trends in teacher turnover. This information can be utilized to address teacher retention efforts and inform better policies. An analysis of the 2018-2020 exit surveys is presented below:

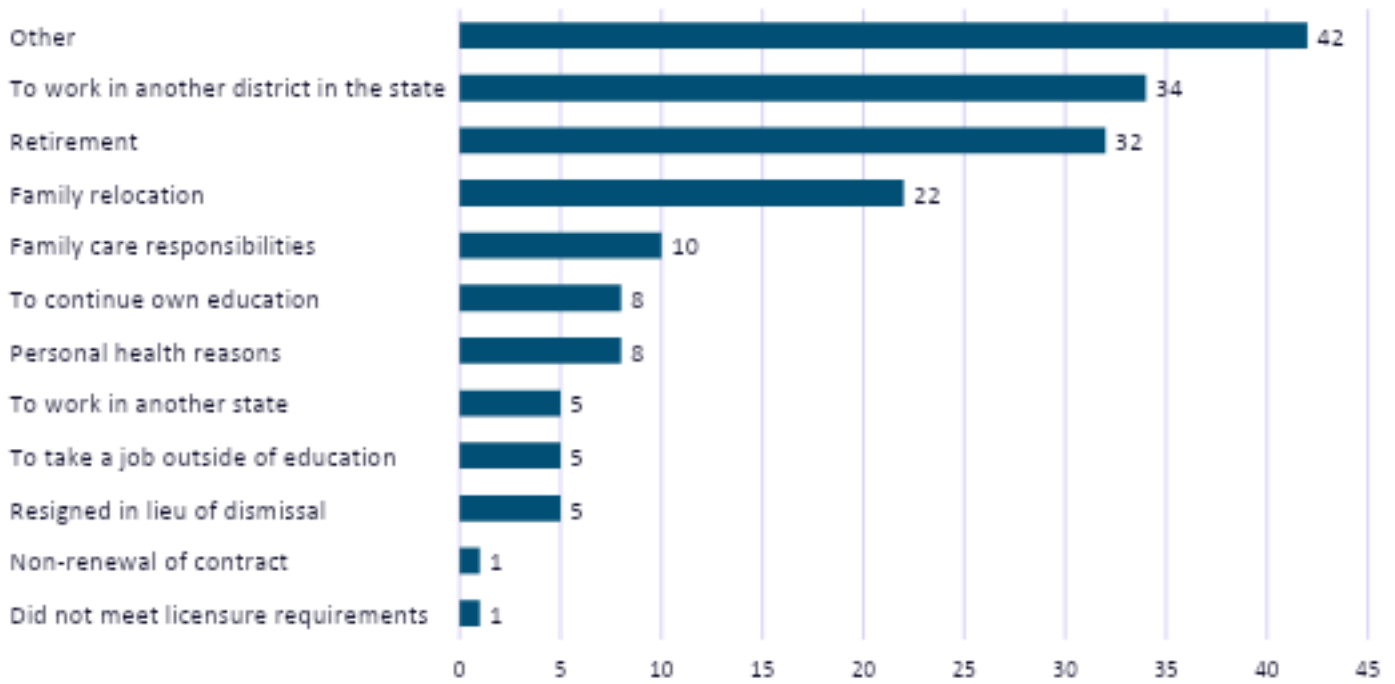
Factors Affecting the Decision to Leave

Waterloo staff were asked to select the primary factor that influenced their decision to leave the District. Twenty respondents selected a factor from a provided list while twenty-eight respondents selected the "Other" option that allowed them to provide a text response or to identify multiple factors. For the respondents who selected a single factor, the top factors for leaving were the lack of administrative support at the District and school level (N=4), student discipline challenges (N=4), and feeling that staff were not fully utilized (N=4). For the respondents who selected the "Other" category, the most common responses were that there was a lack of administrative support at the District and school levels (N=9), staff did not feel listened to or valued (N=8), and that morale was very low (N=8).

Reasons for Leaving

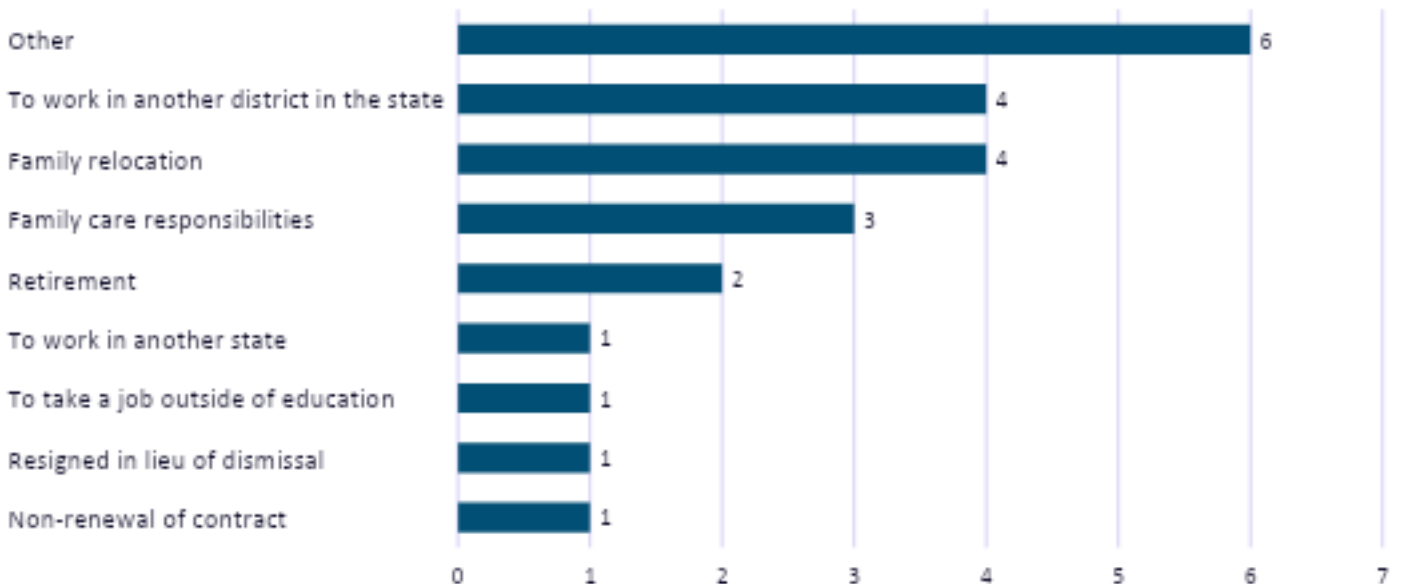
Staff also responded to questions about their reasons for leaving the District. These were analyzed in two groups, the first including responses from all staff and the second including only the responses from non-white staff. The analysis was constructed in this way to identify possible equity issues related to staff turnover (Fig. 4).

FIGURE 4. ALL STAFF PRIMARY REASONS FOR LEAVING THE DISTRICT



For all staff, apart from the “Other” category (N=42), the most common reasons for leaving were to work in another district in the state (N=34), retirement (N=32), family relocation (N=22), and family care responsibilities (N=10).

FIGURE 5. NON-WHITE STAFF PRIMARY REASONS FOR LEAVING THE DISTRICT



For non-white staff (Fig. 5), apart from the “Other” category (N=6), the most common reasons for leaving were to work in another district in the state (N=4), family relocation (N=4), family care responsibilities (N=3), and retirement (N=2).

The “Other” category was the most common reason for leaving for all staff and non-white staff. Respondents had a wide range of reasons for leaving including leaving for higher pay, to work for the AEA, and other individual cases. However, several staff expressed that their reason for leaving was tied to a negative experience in the Waterloo Community School District, such as, “Found a better opportunity in a positive work environment” and “To find a position at a school that treats their teachers as though they are valued team members.” Another staff member wrote, “I just got burned out in Waterloo. I needed to move somewhere else. I would consider going back to Waterloo at some point, but I really needed something different.”

Areas for Improvement/Qualitative Goals

Many staff commented on ways to improve the District workplace. The most common suggestions were to increase pay, improve morale, and provide more support for staff. Additional suggestions for improvement included better communication, appreciation for staff, and professional development opportunities in order to improve the District. Other suggestions included position-specific suggestions such as more teacher autonomy in classes, adjusting para responsibilities to match pay, and providing more planning time and training for teachers.

Staff Development

- Enhance staff development for all management and supervisory personnel regarding employment and personnel practices.
- Develop and provide training for managing diversity in the workplace.
- Continue cultural “implicit bias” discussions.
- Provide antibias training to employees on hiring committees.
- Raise awareness amongst our educators of the research on implicit bias and the substantial role it plays in the education process
- Help educators learn about behaviors and practices that reflect cultural and linguistic competence.

Equity Committee Proposed Strategies

In addition to presenting goals based on the district’s collection and analysis of the data, we also brought our current staff data and teacher mismatch data to the Equity Committee group in order to have their goals and priorities given consideration as representatives of our community, parents, and staff. The suggestions from this meeting are as follows:

-
- Improve the equity conversations our teachers are having with our students on race and other marginalized groups.
 - Survey our teachers about why they chose Waterloo and what sparked their interest in teaching. Review the results and use survey results for initiatives targeting WCSD students interested in teaching.
 - Affinity groups for teachers of color (i.e. BIPOC).
 - Study circles on race, bias, and other related equity issues.
 - Examine minority student participation in the Coop program, particularly those serving as classroom aides.
 - Reach out to Warburg and UNI, work with them on both their equity goals and how ours to be met collaboratively.
 - Mentoring current teachers of color to develop into leadership roles.

Current Initiatives

While all districts in Iowa struggle to attract and retain minority employees, our district has implemented some unique initiatives that have resulted in substantial increases in the number of minority educators.

Minority Teaching Initiatives

This project was a “grow-your-own” originally in collaboration with Wartburg College. Initially the majority of the participants worked in our District in non-certified positions (secretarial, paraeducators, etc.). Individuals who expressed an interest in becoming a teacher and demonstrated ability (most through previously earned college credit) took additional classes to complete education degrees. TeachWaterloo is the current iteration of this initiative, where district employees attend the University of Northern Iowa in order to earn their teaching certificate. Our newest cohort currently has 12 employees starting the program, and will eventually work for the district in a teaching role.

Talent Acquisition & Outreach Specialist

The district has hired a Talent Acquisition and Outreach Specialist. In addition to maintaining and evaluating a student recruiting plan with local businesses, this position will lead the Human Resource departments efforts related to retention and recruitment of diverse instructional and support staff. She will also work with the WCC Teacher Pathways program to support future teachers from the student population.

Targeted Recruitment Program

The district teacher recruitment plan includes efforts to target minority staff. Strategies include participating in career fairs at historically Black colleges and universities (HBCUs) as well as

other teacher preparation institutions that graduate significant numbers of minority candidates. The District also advertises vacancies in specific markets to attract a more diverse applicant pool.

UNI Minorities in Education for Today and Tomorrow (UMETT)

This program is a collaboration with the University of Northern Iowa designed to let minority students explore the teaching profession. The program offers engaging experiences that highlight the importance of the profession, emphasize the positive aspects of teaching and hands-on experiences with youth, at community agencies, or activities that promote the goals of the program.

Evaluation and Progress Monitoring

An overarching goal beyond these proposals will be evaluating how the district has benefited from these initiatives and how effective they have been at moving us towards the quantitative goals set by the district and our equity committee. Developing this evaluation process and conducting the progress monitoring will be directed by the equity officer, with input from the Equity Committee.

Conclusion

The policies and procedures described in this document were developed to address workforce representation issues and concerns. It is the intent of the Waterloo Community School District to continually monitor and improve employment practices.

The members of the Equity Committee will play an important role in the monitoring function. They will provide the advisory guidance necessary for our organization as the effects of our practices are examined.

Questions or requests for information related to this plan may be directed to the Superintendent or the Chief Officer of Human Resources & Equity.

Appendices

Appendix A. Duties of Boards of Directors/Policy Statements

The Waterloo Community School District values our culturally diverse society and is committed to providing quality experiences, which develop an awareness and appreciation for the aspirations, issues, and achievements of all people.

The District shall establish and maintain an atmosphere in which all students and staff can develop attitudes and skills for effective and cooperative living based on respect for the individual.

The Waterloo School District shall promote nondiscrimination through fair and equitable employment, promotion and assignment of staff, utilization of multicultural, nonsexist instructional materials; and equal access for all students to academic and co-curricular programming.

Further, the board affirms the right of all students and staff to be treated with respect and to be protected from intimidation, discrimination, physical harm and harassment.

As a result of these commitments, the board has adopted several policies that outline this commitment to the principles of equal employment opportunity and affirmative action (see appendix A). Further, these policies describe the procedures for employees, applicants for employment, and students can redress complaints of discrimination. These policies are written with the intent and mandate of relevant laws and regulations, including but not limited to:

- A. Civil Rights Act of 1964 As Amended, 42 U.S.C. Section 2000e seq.
- B. Title IX Nondiscrimination in Federally Assisted Education Programs, 20 U.S.C. Section 1681
- C. Fourteenth Amendment of the U.S. Constitution
- D. Iowa Administrative Code Ch. 95 – Equal Employment Opportunity and Affirmative Action in Educational Agencies
- E. Iowa Code Ch. 19B – Equal Employment Opportunity and Affirmative Action

Appendix B. Non-Discrimination Policies

Board Policy 103.0: Continuous Notice of Non-Discrimination

It is the policy of the Waterloo Community School District not to discriminate on the basis of race, color, national origin, sex, disability, religion, creed, age (for employment), marital status (for programs), sexual orientation, gender identity and socioeconomic status (for programs) in its educational programs and its employment practices. If you have questions or a grievance related to this policy please contact Kingsley Botchway II, Chief Officer of Human Resources and Equity, 1516 Washington Street, Waterloo, IA 50702, 319-433-1800, botchwayk@waterlooschools.org.

Board Policy 103.0-P: Compliance with Title IX Guidelines

1. Create an awareness of Title IX among staff members and students under your jurisdiction.
2. Ensure that all student handbooks and materials are in compliance with Title IX guidelines.
3. Acquaint all staff members and students with the name of the Chief Officer of Human Resources and Equity, Kingsley Botchway II, 319-433-1800.
4. Assure the Chief Officer of Human Resources and Equity that the building is in compliance with Title IX guidelines.
5. Conduct an ongoing evaluation of curricular programs offered in the building to ensure compliance.
6. Be aware of and correct all instances of non-compliance which occur in the building.
7. Educate employees and students about the District grievance procedures used in the event of a Title IX grievance.
8. Notify the Chief Officer of Human Resources and Equity in the event of a Title IX grievance.

Board Policy 103.0-R: Annual Notice of Non-Discrimination

The Waterloo Community School District offers career and technical programs in the following service areas:

- Business Education
- Health Occupations Education
- Family and Consumer Sciences Education
- Industrial Education

It is the policy of the Waterloo Community School District not to discriminate on the basis of race, color, national origin, sex, disability, religion, creed, age (for employment), marital status (for programs), sexual orientation, gender identity and socioeconomic status (for programs) in its educational programs and its employment practices. If you have questions or a grievance related to this policy please contact Kingsley Botchway II, Chief Officer of Human Resources and Equity, 1516 Washington Street, Waterloo, IA 50702, 319-433-1800, botchwayk@waterlooschools.org.

Appendix C. Anti-Bullying/Anti-Harassment Policies

Board Policy 103.1: Anti-Bullying/Anti-Harassment Policy

The Waterloo Community School District is committed to providing all students, staff, and adults with a safe and civil school environment in which all members of the school community are treated with dignity and respect. Bullying and/or harassment of or by students, staff, and volunteers is against federal, state, and local policy and is not tolerated by the board. Bullying and/or harassing behavior can seriously disrupt the ability of school employees to maintain a safe and civil environment, and the ability of students to learn and succeed. Therefore, it is the policy of the state and the school district that students and adults shall not engage in bullying or harassing behavior in school, on school property, or at any school function or school-sponsored activity.

Definitions

For the purposes of this policy, the defined words shall have the following meaning:

- “Electronic” means any communication involving the transmission of information by wire, radio, optic cable, electromagnetic, or other similar means. “Electronic” includes but is not limited to communication via electronic mail, internet-based communications, pager service, cell phones, and electronic text messaging.
- “Harassment” and “bullying” shall mean any electronic, written, verbal, or physical act or conduct toward a student based on the individual’s actual or perceived age, color, creed, national origin, race, religion, marital status, sex, sexual orientation, gender identity, physical attributes, physical or mental ability or disability, ancestry, political party preference, political belief, socioeconomic status, or familial status, and which creates an objectively hostile school environment that meets one or more of the following conditions:
 1. Places the student in reasonable fear of harm to the student’s person or property.
 2. Has a substantial detrimental effect on the student’s physical or mental health.
 3. Has the effect of substantially interfering with a student’s academic performance.
 4. Has the effect of substantially interfering with the student’s ability to participate in or benefit from the services, activities, or privileges provided by a school.

-
- “Sexual harassment” means unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature.
 - “Trait or characteristic of the student” includes but is not limited to age, color, creed, national origin, race, religion, marital status, sex, sexual orientation, gender identity, physical attributes, physical or mental ability or disability, ancestry, political party preference, political belief, socioeconomic status, or familial status.
 - “Volunteer” means an individual who has regular, significant contact with students.
 - “Adult” means an individual who may be a parent, volunteer, vendor, visitor, patron, or Board member

Filing a Complaint

A student who alleges a complaint may first attempt to resolve the problem by discussing it with the building administrator. The building administrator may notify the actor of the problem. If the problem cannot be solved, the student may wish to avail themselves of this procedure by filing a complaint with the Executive Director of Student Services. An alternate will be designated in the event it is claimed that the Executive Director of Student Services committed the alleged discrimination or some other conflict of interest exists. Complaints shall be filed within 180 days of the event giving rise to the complaint or from the date the student could reasonably become aware of such occurrence. The student will state the nature of the complaint and the remedy requested. The student shall receive assistance as needed.

An employee or adult who wishes to avail themselves of this procedure may do so by filing a complaint with the Chief Officer of Human Resources and Equity. An alternate will be designated in the event it is claimed that the Chief Officer of Human Resources and Equity committed the alleged discrimination or some other conflict of interest exists. Complaints shall be filed within 180 days of the event giving rise to the complaint or from the date the employee or adult could reasonably become aware of such occurrence. The employee or adult will state the nature of the complaint and the remedy requested. The employee or adult shall receive assistance as needed.

School employees, adults, and students shall not engage in reprisal, retaliation, or false accusation against a victim, witness, or an individual who has reliable information about an act of bullying or harassment.

Investigation

The school district will promptly and reasonably investigate allegations of bullying or harassment. The Executive Director for Student Service will be responsible for handling all complaints alleging bullying or harassment involving students. The Chief Officer of Human Resources and Equity will be responsible for handling all complaints alleging bullying or

harassment involving adults. The Investigator shall consider the totality of circumstances presented in determining whether conduct objectively constitutes bullying or harassment. Upon completion of the investigation, the Investigator shall issue a report with respect to the findings. The Executive Director for Student Services and the Chief Officer of Human Resources shall also be responsible for developing procedures regarding this policy for students, employees, and adults.

Decision

If, after an investigation, a student is found to be in violation of the policy, the student shall be disciplined by appropriate measures, which may include suspension and expulsion. If after an investigation a school employee is found to be in violation of this policy, the employee shall be disciplined by appropriate measures, which may include termination. If after an investigation an adult is found to be in violation of this policy, the adult shall be subject to appropriate measures, which may include exclusion from school grounds.

A school employee, adult, volunteer, or student, or a student's parent or guardian who promptly, reasonably, and in good faith reports an incident of bullying or harassment, in compliance with the procedures in the policy adopted pursuant to this section, to the appropriate school official designated by the school district, shall be immune from civil or criminal liability relating to such report and to participation in any administrative or judicial proceeding resulting from or relating to the report.

Individuals who knowingly file false bullying or harassment complaints and any person who gives false statements in an investigation may be subject to discipline by appropriate measures, as shall any person who is found to have retaliated against another in violation of this policy. Any student found to have retaliated in violation of this policy shall be subject to measures up to, and including, suspension and expulsion. Any school employee found to have retaliated in violation of this policy shall be subject to measures up to, and including, termination of employment. Any adult found to have retaliated in violation of this policy shall be subject to measures up to, and including, exclusion from school grounds.

Publication of 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 web site
- Inclusion into the comprehensive school improvement plan

Board Policy 103.1-R: Anti-Bullying/Anti-Harassment Investigation Procedures

The Waterloo Community School District is committed to providing all students, staff, and adults with a safe and civil school environment in which all members of the school community are treated with dignity and respect. Bullying and/or harassment of or by students, staff, and volunteers is against federal, state, and local policy and is not tolerated by the board. Bullying and/or harassing behavior can seriously disrupt the ability of school employees to maintain a safe and civil environment, and the ability of students to learn and succeed. Therefore, it is the policy of the state and the school district that students and adults shall not engage in bullying or harassing behavior in school, on school property, or at any school function or school-sponsored activity.

Definitions

For the purposes of this policy, the defined words shall have the following meaning:

- “Electronic” means any communication involving the transmission of information by wire, radio, optic cable, electromagnetic, or other similar means. “Electronic” includes but is not limited to communication via electronic mail, internet-based communications, pager service, cell phones, and electronic text messaging.
- “Harassment” and “bullying” shall mean any electronic, written, verbal, or physical act or conduct toward a student based on the individual’s actual or perceived age, color, creed, national origin, race, religion, marital status, sex, sexual orientation, gender identity, physical attributes, physical or mental ability or disability, ancestry, political party preference, political belief, socioeconomic status, or familial status, and which creates an objectively hostile school environment that meets one or more of the following conditions:
 1. Places the student in reasonable fear of harm to the student’s person or property.
 2. Has a substantial detrimental effect on the student’s physical or mental health.
 3. Has the effect of substantially interfering with a student’s academic performance.
 4. Has the effect of substantially interfering with the student’s ability to participate in or benefit from the services, activities, or privileges provided by a school.
- “Sexual harassment” means unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature.
- “Trait or characteristic of the student” includes but is not limited to age, color, creed, national origin, race, religion, marital status, sex, sexual orientation, gender identity,

physical attributes, physical or mental ability or disability, ancestry, political party preference, political belief, socioeconomic status, or familial status.

- “Volunteer” means an individual who has regular, significant contact with students.
- “Adult” means an individual who may be a parent, volunteer, vendor, visitor, patron, or Board member

Filing a Complaint

A student who alleges a complaint may first attempt to resolve the problem by discussing it with the building administrator. The building administrator may notify the actor of the problem. If the problem cannot be solved, the student may wish to avail themselves of this procedure by filing a complaint with the Executive Director of Student Services. An alternate will be designated in the event it is claimed that the Executive Director of Student Services committed the alleged discrimination or some other conflict of interest exists. Complaints shall be filed within 180 days of the event giving rise to the complaint or from the date the student could reasonably become aware of such occurrence. The student will state the nature of the complaint and the remedy requested. The student shall receive assistance as needed.

An employee or adult who wishes to avail themselves of this procedure may do so by filing a complaint with the Chief Officer of Human Resources and Equity. An alternate will be designated in the event it is claimed that the Chief Officer of Human Resources and Equity committed the alleged discrimination or some other conflict of interest exists. Complaints shall be filed within 180 days of the event giving rise to the complaint or from the date the employee or adult could reasonably become aware of such occurrence. The employee or adult will state the nature of the complaint and the remedy requested. The employee or adult shall receive assistance as needed.

School employees, adults, and students shall not engage in reprisal, retaliation, or false accusation against a victim, witness, or an individual who has reliable information about an act of bullying or harassment.

Investigation

When students are involved, the investigator, with the approval of the principal, or the principal has the authority to initiate a bullying or harassment investigation in the absence of a written complaint. In other instances, the investigator, with the approval of the Superintendent, or the Superintendent has the authority to initiate a bullying or harassment investigation in the absence of a written complaint.

The investigator may request that the complainant complete the complaint form and turn over evidence of the incident, including, but not limited to, letters, tapes, or pictures. The complaint

form is also available to be completed by any witness. Information received during the investigation shall be kept confidential to the extent possible.

If the Complainant is under 18 years of age, the Investigator shall notify his or her parent(s)/guardian(s) that they may attend investigatory meetings in which the Complainant is involved. The complaint and identity of the Complainant, Respondent, or witnesses will only be disclosed as reasonably necessary in connection with the investigation or as required by law or policy.

Decision

If, after an investigation, a student is found to be in violation of the policy, the student shall be disciplined by appropriate measures, which may include suspension and expulsion. If after an investigation a school employee is found to be in violation of this policy, the employee shall be disciplined by appropriate measures, which may include termination. If after an investigation an adult is found to be in violation of this policy, the adult shall be subject to appropriate measures, which may include exclusion from school grounds.

A school employee, adult, volunteer, or student, or a student's parent or guardian who promptly, reasonably, and in good faith reports an incident of bullying or harassment, in compliance with the procedures in the policy adopted pursuant to this section, to the appropriate school official designated by the school district, shall be immune from civil or criminal liability relating to such report and to participation in any administrative or judicial proceeding resulting from or relating to the report.

Individuals who knowingly file false bullying or harassment complaints and any person who gives false statements in an investigation may be subject to discipline by appropriate measures, as shall any person who is found to have retaliated against another in violation of this policy. Any student found to have retaliated in violation of this policy shall be subject to measures up to, and including, suspension and expulsion. Any school employee found to have retaliated in violation of this policy shall be subject to measures up to, and including, termination of employment. Any adult found to have retaliated in violation of this policy shall be subject to measures up to, and including, exclusion from school grounds.

Information

The Chief Officer of Human Resources shall be responsible for organizing information programs for employees and adults that shall include how to recognize bullying or harassment and what to do in case an adult is bullied or harassed. The Executive Director of Student Services will disseminate information to students annually that shall include how to recognize and what to do if a student is bullied or harassed.

Board Policy Document 103.1-E1: Complaint form for Allegations of Bullying/Harassment and/or Discrimination and/or Violation of District Policy

(FOR USE WITH POLICIES 103.1, 103.2, 109.0, 402.4, 403.51)

Date of Complaint: _____

Complainant Information

Name: _____

Address: _____

Telephone Number: _____

Position (if employee): _____

School (if student): _____

Type of Complaint: (For allegations of abuse of students by District employees, use form 402.3-E1)

Bullying/Harassment Discrimination Violation of District Policy



Check the basis of bullying/harassment or discrimination Description of Policy

	Age		Political Belief	
	Disability		Political Party Preference	
	Familial Status		Race/Color	
	Gender Identity		Religion/Creed	
	Marital Status		Sex	
	National Origin/Ethnic Background/Ancestry		Sexual Orientation	
	Physical Attribute		Socio-economic Background	
	Physical/Mental Ability		Other-Please Specify	

What is the name of the person alleged to have harassed, discriminated, or violated policy?

Position (if employee) _____

Date and place of incident or incidents: _____

Description of misconduct/violation (use additional sheets if necessary): _____

Name and address of witnesses (if any): _____

Evidence of misconduct, i.e. letters, photos, etc. (attach evidence if possible): _____

Any other information (may use additional sheets if necessary): _____

Remedy Sought: _____

I agree that all the information on this form is accurate and true to the best of my knowledge.

Signature: _____ Date: _____

If the allegation involves a student, return this form to:

Marla Padget, Executive Director of Student & At-Risk Services
Education Service Center
1516 Washington St. Waterloo, Iowa 50702
319-433-1801

For allegations involving nonstudents, return this form to:

Kingsley Botchway II
Chief Officer of Human Resources & Equity

Education Service Center
1516 Washington St. Waterloo, Iowa 50702
319-433-1800

For allegations of violation of District policy, form should initially be turned into building administrator. If the complaint is not resolved, employee may file a written request for a conference with:

Kingsley Botchway II
Chief Officer of Human Resources & Equity

Board Policy Document 103.1-E2: Witness Disclosure Form for Allegations of Bullying/Harassment and/or Discrimination

(FOR USE WITH POLICIES 103.1, 103.2, 109.0, 402.4, 403.51, 503.3)

Please fill out the following if you are named a witness to an alleged incident of harassment and/or discrimination.

Name of witness: _____

Address of witness: _____

Position of witness (if employee): _____

Date of testimony/interview: _____

Description of the incident witnessed: _____

Any other information: _____

I agree that all the information on this form is accurate and true to the best of my knowledge.

Signature: _____ Date: _____

Appendix D. Equal Education Opportunity

Board Policy 104.0: Equal Education Opportunity

It is the policy of the Waterloo Community School District not to discriminate on the basis of race, color, national origin, sex, disability, religion, creed, age (for employment), marital status (for programs), sexual orientation, gender identity and socioeconomic status (for programs) in its educational programs and its 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 Kingsley Botchway II, Chief Officer of Human Resources and Equity, 1516 Washington Street, Waterloo, IA 50702, 319-433-1800, botchwayk@waterlooschools.org.

It is also the policy of the Waterloo Community School District to provide programs, activities, curricula, and instructional resources which reflect the cultural diversity of the United States and the variety of opportunities open to all genders, including individuals with disabilities, in our society. One of the objectives of the Waterloo Community School District is to reduce stereotyping and to eliminate bias, prejudice, and discrimination. The curriculum, programs, and services shall foster respect and appreciation for cultural diversity and an awareness of the rights, duties and responsibilities of each individual as a member of a pluralistic society.

The board requires all persons, agencies, vendors, contractors and other persons and organizations doing business with or performing services for the school district to subscribe to all applicable federal and state tax laws, executive orders, rules and regulations pertaining to contract compliance and equal opportunity.

Board Policy 104.0-R: Equal Education Opportunity

Federal and state regulations require that the non-discrimination policy, the identity of the designated local educational equity coordinator, and notification about the existence of the grievance procedure be disseminated to students, employees, parents and the community on an annual or ongoing basis. This notification must be included in major annual publications or communications targeting those groups such as:

- Student Handbooks
- Teacher/Employee
- Handbooks School
- Newsletters
- Registration Handbooks
- Program Recruitment Brochures

-
- Local Newspapers
 - Parent and Student Policy Handbook
 - Website

Appendix E. Complaints by Citizens

Board Policy 109.0: Complaints by Citizens

The Board recognizes that concerns regarding the operation of the school district will arise. The Board further believes that constructive criticism can assist in improving the quality of the education program and in meeting individual student needs more effectively. The Board also places trust in its employees and desires to support their actions in a manner which frees them from unnecessary or unwarranted criticism and complaints. Procedures for dealing with complaints concerning programs or practices will be governed as set forth by regulation 109.0-R.

Board Policy 109.0-R: Complaints by Citizens

Procedures for dealing with complaints concerning programs or practices should be governed by the following principles:

- when a complaint is received, the matter should be handled as near the source as possible;
- complaints should both be addressed and resolved expeditiously;
- complaints should be dealt with courteously and in a constructive manner; and,
- individuals directly affected by the complaint should have an opportunity to respond.

It will first be the responsibility of the building administrators to address questions and problems raised by members of the school district community.

If resolution is not possible by any of the above, individuals may bring their concerns to the attention of the Executive Director of Student & At-Risk Services or the Director of School and Community Relations within 5 school days of their discussion with the building administrator. Unresolved issues will then be referred to the Associate Superintendent. If the issue remains unresolved, it will then be referred to the Superintendent.

Specific procedures for handling complaints may be established in policies. The Board, consistent with its Board policy-making role, will deal with complaints concerning specific schools, programs or procedures only after the usual channels have been exhausted. Complaints regarding employees or complaints by students will follow the more specific policies on those issues.

When a complaint requiring attention is received by the Board or a Board member, it will be referred to the Superintendent. After all of the channels have been exhausted, the complainant may appeal to the Board by requesting a place on the Board agenda or during the public audience portion of the Board meeting.

Public Complaints about Employees

Prior to Board action, the following should be completed:

- a) Matters concerning an individual student, teacher, or other employee should first be addressed to the teacher or employee.
- b) Unsettled matters from (a) above or problems and questions about individual attendance centers should be addressed to the building principal or supervisor.
- c) Unsettled matters concerning school district employees should be directed to the Associate Superintendent for Human Resources & Equity.
- d) If a matter cannot be settled satisfactorily by the Chief Officer of Human Resources & Equity, it may then be brought to the Superintendent.

After these steps have been exhausted, a concern may be brought to the Board. To bring a concern regarding an employee, the individual may notify the Board president in writing, who may bring it to the attention of the entire Board. The item may be placed on the Board agenda of a special Board meeting, which may be held in closed session.

Board Policy 109.0-E1: Complaint Form for Allegations by Citizens of Harassment and/or Discrimination and/or Violation of District Policy

(FOR USE WITH POLICIES 103.1, 103.2, 109.0, 402.4, 403.51)

Date of Complaint: _____

Complainant Information

Name: _____

Address: _____

Telephone Number: _____

Position (if employee): _____

School (if student): _____

Type of Complaint: (For allegations of abuse of students by District employees, use form 402.3-E1)

Bullying/Harassment Discrimination Violation of District Policy

Check the basis of bullying/harassment or discrimination Description of Policy

Age	Political Belief
Disability	Political Party Preference
Familial Status	Race/Color
Gender Identity	Religion/Creed
Marital Status	Sex
National Origin/Ethnic Background/Ancestry	Sexual Orientation
Physical Attribute	Socio-economic Background
Physical/Mental Ability	Other-Please Specify

What is the name of the person alleged to have harassed, discriminated, or violated policy?

Position (if employee) _____

Date and place of incident or incidents: _____

Description of misconduct/violation (use additional sheets if necessary): _____

Name and address of witnesses (if any): _____

Evidence of misconduct, i.e. letters, photos, etc. (attach evidence if possible): _____

Any other information (may use additional sheets if necessary): _____

Remedy Sought: _____

I agree that all the information on this form is accurate and true to the best of my knowledge.

Signature: _____ Date: _____

If the allegation involves a student, return this form to:

Marla Padget, Executive Director of Student & At-Risk Services
Education Service Center
1516 Washington St. Waterloo, Iowa 50702
319-433-1801

For allegations involving nonstudents, return this form to:

Kingsley Botchway II
Chief Officer of Human Resources & Equity
Education Service Center
1516 Washington St. Waterloo, Iowa 50702
319-433-1800

For allegations of violation of District policy, form should initially be turned into building administrator. If the complaint is not resolved, employee may file a written request for a conference with:

Kingsley Botchway II
Chief Officer of Human Resources & Equity

Board Policy Document 109.0-E2: Witness Disclosure Form for Allegations of Bullying/Harassment and/or Discrimination

(FOR USE WITH POLICIES 103.1, 103.2, 109.0, 402.4, 403.51, 503.3)

Please fill out the following if you are named a witness to an alleged incident of harassment and/or discrimination.

Name of witness: _____

Address of witness: _____

Position of witness (if employee): _____

Date of testimony/interview: _____

Description of the incident witnessed: _____

Any other information: _____

I agree that all the information on this form is accurate and true to the best of my knowledge.

Signature: _____ Date: _____

Appendix F. Equal Employment Opportunity/Affirmative Action Policy

Board Policy 402.4: Equal Employment Opportunity/Affirmative Action Policy

The Waterloo Community School District shall 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 shall 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 shall be given notice of this policy annually.

The Board shall appoint an affirmative action coordinator. The affirmative action coordinator shall have the responsibility for drafting the affirmative action plan. The affirmative action plan shall be reviewed by the Board at least every two years.

Individuals who file an application with the school district will be given consideration for employment if they meet or exceed the qualifications set by the Board, administration, and Iowa Department of Education for the position for which they apply. In employing individuals, the Board shall consider the qualifications, credentials, and records of the applicants without regard to race, color, creed, sex, sexual orientation, gender identity, ethnic/national origin, religion, age, socio-economic status or disability. In keeping with the law, the Board shall consider the military veteran status of applicants.

Advertisements and notices for vacancies within the district shall contain the following statement: "The Waterloo Community School District is an equal employment opportunity/affirmative action employer." The statement shall also appear on application forms.

Inquiries by employees or applicants for employment regarding compliance with equal employment opportunity and affirmative action laws and policies, including but not limited to

complaints of discrimination, shall be directed to the Affirmative Action Coordinator by writing to Kingsley Botchway II, Affirmative Action Coordinator, Waterloo Community School District, Education Service Center, 1516 Washington Street, Waterloo, Iowa 50702; or by telephoning (319) 433-1800.

Inquiries by employees or applicants for employment regarding compliance with equal employment opportunity and affirmative action laws and policies, including but not limited to complaints of discrimination, may also be directed in writing to the Director of the Region VII Office of Civil Rights, U.S. Department of Education, Citigroup Center, 500 W. Madison Street, Ste. 1475, Chicago, IL, 60661-4544, (312) 730-1560 or the Iowa Civil Rights Commission, Grimes State Office Building, 400 E. 14th Street, Des Moines, Iowa, 50319-1044, (515) 281-4121. This inquiry or complaint to the federal office may be done instead of, or in addition to, an inquiry or complaint at the local level.

Further information and copies of the procedures for filing a complaint are available in the school district's central administrative office, the administrative office in each attendance center, and on the District's website at <http://www.waterlooschools.org/newpolicies/>

Board Policy 402.4: Dissemination of Equal Employment Opportunity/Affirmative Action Policy

Federal and state regulations require that the equal employment opportunity/affirmative action policy, the identity of the designated local coordinator and notification about the existence of the grievance procedure be disseminated to employees, and applicants for employment on an annual or ongoing basis. This notification must be included in major annual publications or communications targeted at employees, applicants for employment and unions or professional organizations holding collective bargaining or professional agreements with the agency such as:

- Teacher and Employee Handbooks
- Application Forms and Recruitment Brochures
- Media Ads Regarding Job Openings
- Formal Communications with Unions, Professional Associations or other Collective Bargaining Groups

Board Policy 403.51: Resolution of Employee Complaints

Complaints of employees against fellow employees should be discussed directly between employees. If necessary, complaints shall be brought directly to the immediate supervisor, principal or superintendent and shall be made in a constructive and professional manner. Complaints shall never be made in the presence of other employees, students or outside

persons. This policy shall not apply to a complaint that has been or could be filed at the employee's discretion under the formal grievance procedure of the relevant master contract nor to a situation between an employee and his or her supervisor.

Appendix G. Student Non-Discrimination Policy

Board Policy 503.2: Student Non-Discrimination Policy

The Board of Education of the Waterloo Community School District is committed to providing equal educational opportunities for all students. The District will work to insure both the physical and psychological safety and well-being of all students. No employee, while representing the District, shall engage in any act of discrimination against any student because of race, color, creed, sex, sexual orientation, gender identity, ethnic/national origin, religion, marital status, socio-economic status or disability.

The following definitions shall apply to this statement and the one covering employee violations of District policies.

1. "Act of discrimination" means any act participated in by an employee which directly or indirectly, in the mind of an ordinary, reasonable person causes humiliation, derogation, or disparagement to any individual or group of individuals on account of race, color, creed, sex, sexual orientation, gender identity, ethnic/national origin, religion, marital status, socio-economic status or disability.
2. "While representing the District" means at any time or place where the employee is within the scope of his/her employment for the District.

Any student who believes he or she has been discriminated against should file a complaint with the Waterloo Community School District's Equity and Affirmative Action Coordinator, Kingsley Botchway II, or the Disability Compliance Officer. Complaint forms can be obtained in the principal's office, the counseling office, and Equity and Affirmative Action office, 1516 Washington Street, Waterloo, 319-433-1800 or on line at <http://www.waterlooschools.org/newpolicies/>.

Board Policy 503.2-R: Nondiscrimination

It is the policy of the Waterloo Community School District not to illegally discriminate on the basis of race, color, national origin, sex, disability, religion, creed, age (for employment), marital status (for programs), sexual orientation, gender identity and socioeconomic status (for programs) in its educational programs and its 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 the district Equity/Affirmative Action Officer, Kingsley Botchway II, Chief Officer of Human Resources/Equity, 1516 Washington Street, 319-433-1800, botchwayk@waterlooschools.org.

Board Policy 503.3: Student Grievance Policy

All individuals who have contact with the District must respect the policies and administrative regulations under which the District operates. It is recognized that questions concerning the interpretation, application, or possible violation of policies and/or regulations may occur and that there must be legitimate and reasonable channels through which these questions may be resolved.

Complaints about Violation of District Policies

A student or parent/guardian who believes the District has not complied with its policies or regulations may file a complaint under this policy. A student grievance with the Waterloo Community School District shall be resolved at the lowest possible level in accordance with the grievance procedure, 503.3-R.

Other Bases for Complaints

- 1. DISCRIMINATION** Any student who believes he or she has been discriminated against in violation of Board Policy 503.2, Student Discrimination Policy, may also file a complaint with the Waterloo Community School District's Affirmative Action and Equity Officer, Kingsley Botchway II, or the Executive Director of Student and At-Risk Services, Marla Padget. Complaint forms can be obtained in the principal's office, the counseling office, and/or in the Equity and Affirmative Action Office, Education Service Center, 1516 Washington Street, Waterloo.
- 2. ANTI-BULLYING/HARASSMENT** Any person who believes that he or she has been bullied/harassed should refer to district policy 103.1 Anti-Bullying/Harassment.

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3. ABUSE OF STUDENTS BY SCHOOL DISTRICT EMPLOYEES Any student who believes that he or she has been physically abused by a district employee should refer to district policy 402.3 Abuse of Students by School District Employees.

Board Policy 503.3-R: Student Grievance Regulation

A. STUDENT GRIEVANCES

1. A student who alleges a complaint may first attempt to resolve the problem by discussing it with the building administrator. The building administrator may notify the actor of the problem. If the problem cannot be solved, the parties may proceed formally to Level One. The following are not grievable:
 - a. Placement of a student in a grade
 - b. Transfers of a student between buildings
 - c. Assignment of a student to a building
 - d. Complaints of one student against another
2. LEVEL ONE - BUILDING ADMINISTRATOR
 - a. Formal student grievances shall be filed using form 503.3-E1, no later than seven (7) days from the act precipitating the grievance, with the building administrator who shall be the Level One hearing officer. The student's parent, guardian or legal custodian must either sign the grievance or accompany the student when he/she files it. If, for any reason, a student is not in the building, the parent, guardian or legal custodian or the attorney shall be allowed into the building to file a grievance before or after school hours. The Level One hearing officer shall immediately, by telephone or mail, notify the student's (aggrieved party's) parent, guardian or legal custodian of the filing of a grievance.
 - b. The hearing officer (building administrator) shall then investigate the facts and circumstances of the grievance and interview the aggrieved and actor and shall attempt to solve the grievance to their mutual satisfaction. The hearing officer (building administrator) shall then deliver a report of the grievance and a decision within three (3) school days. A copy of this regulation will be provided to the aggrieved party and his/her parents, guardian, or legal custodian.

3. LEVEL THREE - EXECUTIVE DIRECTOR OF STUDENT AND AT-RISK SERVICES

- a.** Any interested party may appeal the Level Two decision to the Executive Director of Student Services, who shall be the Level Three hearing officer, by filing an appeal with the Assistant Superintendent of Administrative/Student Services (3) school days of delivery of the final Level Two decision.
- b.** The Level Three hearing officer shall investigate the facts and circumstances, and, if the hearing officer deems it necessary, interview the aggrieved and actor. The Level Three hearing officer shall deliver a report of his/her actions and decisions within three (3) school days of the filing of the appeal.

4. LEVEL FOUR - SUPERINTENDENT

- a.** Any interested party may appeal the Level Three decision to the Superintendent, who shall be the Level Four hearing officer, by filing an appeal with the Superintendent within three (3) school days of delivery of the final Level Three decision.
- b.** The Level Four hearing officer shall investigate the facts and circumstances, and, if the hearing officer deems it necessary, interview the aggrieved and actor. The Level Four hearing officer shall deliver a report of his/her actions and decisions within three (3) school days of the filing of the appeal.

B. ACT OF DISCRIMINATION

- 1.** Except as modified in this section the discrimination grievance procedure shall be the same as for any other grievance.
- 2.** The building administrator shall, immediately upon hearing of an alleged act of discrimination, report the same by telephone or in person, to the Executive Director of Student and At-Risk Services. If the Executive Director of Student and At-Risk Services first hears of an alleged act of discrimination, the said Executive Director of Student and At-Risk Services shall immediately notify the building administrator. The Executive Director of Student and At-Risk Services shall contact the aggrieved within three (3) school days of being informed of the grievance to ascertain if the grievance has been resolved and to do what he/she can to improve the situation. He/she shall remain in contact with all other interested parties until the matter is finally resolved.

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- 3.** The Executive Director of Student and At-Risk Services shall be an interested party for all grievances alleging acts of discrimination.
 - 4.** Where the grievance involves an alleged act of discrimination, the times for filing and delivering decisions and appeals shall be the same as in other grievances except for the following:
 - a.** Level One hearing officer decisions — three school days
 - b.** Level Two hearing officer decisions — three school days
 - c.** Level Three hearing officer decisions — three school days
 - d.** Level Four hearing officer decisions — three school days

C. GENERAL - APPLICABLE TO ALL GRIEVANCES

1. Student Representation

- a.** If the aggrieved are three or fewer students, such students may represent themselves and each must be accompanied by their parent, guardian or legal custodian and each may be represented by an attorney.
- b.** If the aggrieved are more than three students, such students must select not more than three persons to represent them.
 - i.** Only the parent, guardian or legal custodian and attorneys may act as representatives.
 - ii.** The students involved, their attorneys and their parent, guardian or legal custodian, whether designated as representatives or not, may attend any proceedings.
 - iii.** The actor may be represented at any proceeding by an attorney and/or a representative selected by the actor.
 - iv.** If the Level One hearing officer (building administrator) determines that the grievance will substantially affect more than just the aggrieved or the actor, the hearing officer may refuse to hear the grievance. In this event, the grievance shall be treated as a group grievance and the procedure shall be commenced at Level Four. The Level Four hearing officer shall have the right to send any such grievance to a lower level.
 - v.** In all cases where the aggrieved has selected a representative, the aggrieved shall notify the appropriate hearing officer of this fact, in

writing, and the representative shall be substituted for the aggrieved or an interested party.

2. Confidence

- a.** All documents, communications and records dealing with the processing of a grievance shall be kept in a separate file and shall not be kept in the student's cumulative or the actor's (employee's) personnel file. Such documents, communications and records concerning student and actors shall be kept in the offices of Student and Supplemental Services and Human Resources, respectively.
- b.** Nothing herein shall require any person to divulge any information acquired in confidence.

3. Grievances against hearing officers

In any case where the actor is the hearing officer, the procedure shall start at the next highest level, except that no grievance shall start at the Board Level (Level Five). If the actor is the Superintendent, the President of the Board of Education shall be the Level Four hearing officer.

4. Form

Each grievance shall state the nature of the grievance, the aggrieved, the actor, the names of any witnesses, and any other information deemed pertinent by the aggrieved. The District shall make the appropriate forms easily available in all buildings.

5. Reprisals

No reprisals of any kind shall be taken by the Board or by any employee of the District against any interested party or any representative or any other participant in the grievance procedure by reason of such participation.

6. Time

- a.** If the grievance process cannot be completed by the time frame stated, a written communication regarding the delay will be provided to all parties with a copy to the Level Three hearing officer for review and action.

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- b.** Every effort will be made to have a grievance processed at times which will not require a replacement for the staff member involved for the performance of normal duties or disruption of student class time.
 - c.** In computing time, the first day, the day the actor acts, or the day of the grievance or appeal if filed, shall be excluded and the last day of the time limit included.
 - d.** Any grievance or appeal not timely taken shall be considered waived unless the hearing officer determines that a good cause has been shown that warrants waiving the time limits. If the hearing officer fails to deliver a decision within the specified time limits, the grievance or appeal shall be considered denied and this decision may be appealed unless the contrary is agreed to by the aggrieved and the actor.

7. Writing

All filings, appeals and decisions shall be in writing.

8. Group Grievances

If more than one grievance is filed involving substantially the same issue, the Level Four hearing officer shall have the right to consolidate them and treat them as one grievance filed by more than one person.

9. Delegation

Whenever a particular person is designated by this regulation to do a particular function, the function may be delegated by that person to a substitute, only if the named person is unable to do the function. A substitute for the Superintendent shall be the acting Superintendent. In the event of a substitution, the substitute shall notify all interested parties in writing on the day of such appointment.

10. Dissemination

The essence of this procedure shall, within the first two weeks of attendance, be given to all students in the secondary schools and mailed to all heads of household. The entire procedure shall be in each teacher's handbook and made known to all other employees.

D. DEFINITIONS

1. The actor is the person whose act caused the grievance.
2. The aggrieved is the person making the claim.
3. For purposes of the timeline, a day is between 7:00 a.m. and 6:00 p.m. on a day when school is in session. Anything occurring after 6:00 p.m. shall be considered to have happened the next day.
4. Delivery is accomplished when a writing is mailed or when personal service is accomplished. All decisions of the hearing officers shall be delivered to parent/guardians, involved District employees, building administrators, and other District personnel. Decisions of the hearing officers must be given to the aggrieved and the actor by personal service by either the hearing officer or a delegate. Personal service is accomplished by either: (1) mailing by certified mail to the recipient's address as shown in the school records; or (2) personally handing it to the recipient; or (3) handing it, at the dwelling house or usual place of abode, to any person residing therein who is at least eighteen years old; or (4) handing it to the parent, guardian or legal custodian or spouse of the recipient. When delivery is accomplished by personal service, other than by certified mail, the person making the delivery shall take the signed receipt of the person receiving the notice.
5. Filing is informing the appropriate person, in writing, that the aggrieved has a grievance or that the person filing is appealing a decision of a hearing officer. Only the aggrieved, parent, guardian or legal custodian or their attorney may file a grievance.
6. A grievance is a claim by a student questioning the interpretation or application of a board policy or Administrative Regulation or alleging a violation thereof.
7. The hearing officer is the person designated at each level of the procedure with whom grievances and appeals are filed and who shall hear grievances and their appeals. To the extent possible, the hearing officer shall have special training or experience in human relations.
8. The interested party is the aggrieved, the actor, the building administrator, and/or person designated by the Superintendent.
9. Words and phrases shall be construed as in the singular or plural number and as masculine, feminine or neuter gender according to the context.

Board Document 503.3-E1: Student Grievance Complaint Form

Name of complainant: _____

Student Name and School: _____

Date of complaint: _____

Name of alleged person: _____

Date and place of incident or incidents: _____

Description of misconduct (use additional sheets if necessary): _____

Name of witnesses (if any): _____

Evidence of incident, i.e.: letters, photos, etc. (attach evidence if possible)

Any other pertinent information: _____

I agree that all of the information on this form is accurate and true to the best of my knowledge.

Signature: _____ Date: _____

Return form to: Building Administrator