

**Trident Technical College  
Affirmative Action Plan  
As of October 1, 2019**

**Agency Head: Dr. Mary Thornley  
EEO/AA Officer: DeVetta Williams Hughes**

## **FOREWORD**

Trident Technical College recognizes and is fully committed to its legal obligations to provide equal opportunity to prospective and existing employees. As an inclusive community, we are committed to Affirmative Action and to Equal Opportunity as major organizational values.

The preparation of the Affirmative Action and Equal Opportunity Plan allows all of us to consider the common purposes and values that unite our College and transcend differences among individuals and groups. Our diversity in ethnicity, gender, sexual orientation, religion, age and abilities are tremendous assets for Trident Technical College and in our role in the community, the region and the state.

The College values affirmative action, equal opportunity and diversity and remains committed to programs, policies, and practices that promote and advance equal opportunity for all citizens.

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## INTRODUCTION

Trident Technical College is committed to providing equal employment opportunities for all employees and applicants for employment on the basis of merit and without regard to race, color, religion, gender, sexual orientation, age, pregnancy, marital status, veteran status, gender identity, national or ethnic origin or disability. The College promotes the full realization of equal employment opportunity through an affirmative employment program that aims to eliminate discrimination based on factors that are irrelevant to job performance. The College makes every effort to ensure that all employment decisions and personnel actions, including recruitment, selection, training, promotion, transfer and benefits, are administered in conformance with applicable federal and state statutes and regulations governing equal employment and personnel management.

The Equal Employment Opportunity/Affirmative Action Plan will help us achieve our goal of equal employment opportunity for all. The College President is ultimately responsible for the College's policies on equal employment opportunity and affirmative action. The Associate Vice President for Human Resources has overall responsibility for implementation of the College's Affirmative Action Plan, including development of specific goals and timetables, and is responsible for reporting progress to the President, President's Cabinet and other identified internal and/or external groups.

Trident Technical College's institutional officers, directors, managers, supervisors and interview panels are charged specifically with ensuring, through enlightened leadership, the continued and positive support of all objectives of the Plan. Management at all levels will ensure that questions and complaints of alleged unlawful discrimination or harassment are investigated promptly and thoroughly, and resolved without threat or reprisal to the employee or applicant.

All employees of Trident Technical College have a personal responsibility to support equal employment opportunity and diversity in the workplace. The College has a strong commitment to ensure that all employees are able to take full advantage of opportunities to enhance their personal career goals.

The Trident Technical College Equal Employment/Affirmative Action Plan will remain in effect until the Affirmative Action Plan goals are achieved.

## **VISION, MISSION, VALUES AND GOALS**

### **MISSION STATEMENT**

**NUMBER:** 2-18-0      **APPROVED DATE:** 10-08-2000

**LEGAL AUTHORITY:** S.C. CODE ANN. §§59-53-410 to -440 (1997); 1996 S.C. ACTS 359

### **MISSION STATEMENT**

#### **Mission**

Trident Technical College serves as a catalyst for personal, community, and economic development by empowering individuals through education and training.

#### **Vision**

Educate the individual. Accelerate the economy. Inspire the future.

#### **Values**

- Integrity
- Respect
- Student achievement
- Academic excellence
- Accessibility and affordability
- Diversity, equity and inclusion
- Excellence in customer service
- Expertise
- Academic freedom
- Accountability
- Global competitiveness

#### **Role and Scope**

Trident Technical College is a public, two-year, multi-campus community college that provides quality education and promotes economic development in Berkeley, Charleston and Dorchester counties.

An open-door institution of higher education, and one of the largest institutions in the state, Trident Technical College serves traditional and nontraditional curriculum students who have a wide variety of educational goals, from personal enrichment to career development to university transfer. To help students meet their goals, Trident Technical College offers university transfer associate degrees and applied technical associate degrees, diplomas and certificates. The curriculum includes programs in arts and sciences, aeronautical studies, agriculture, business, computer technology, engineering technology, health sciences, hospitality, industrial technology, and public service. Trident Technical College students draw on knowledge from a broad range of disciplines to develop the communication and critical thinking skills that are fundamental to lifelong learning.

Trident Technical College further promotes economic development through continuing education courses; customized education and training for business, industry and government; and a variety of employment training programs.

Trident Technical College is committed to being accessible and responsive to community needs. To foster student success, Trident Technical College provides developmental education and comprehensive student services. In addition to traditional instruction, Trident Technical College's flexible course offerings and alternative delivery methods, including online instruction, enable more members of the community to pursue higher education.

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Approved by TTC Area Commission October 30, 2001  
Approved by TTC Area Commission October 15, 2002  
Approved by TTC Area Commission October 21, 2003  
Reaffirmed by TTC Area Commission October 22, 2004  
Approved by TTC Area Commission September 20, 2005  
Reaffirmed by TTC Area Commission November 14, 2006  
Approved by TTC Area Commission May 27, 2008  
Approved by South Carolina Commission on Higher Education August 5, 2008  
Reaffirmed by TTC Area Commission March 24, 2009  
Approved by TTC Area Commission March 23, 2010  
Approved by South Carolina Commission on Higher Education May 20, 2010  
Approved by TTC Area Commission September 20, 2011  
Approved by South Carolina Commission on Higher Education January 13, 2012  
Reaffirmed by TTC Area Commission January 15, 2013  
Approved by TTC Area Commission March 19, 2013  
Reaffirmed by TTC Area Commission January 21, 2014  
Approved by TTC Area Commission March 24, 2015  
Approved by TTC Area Commission May 26, 2015  
Approved by TTC Area Commission August 2, 2016  
Approved by TTC Area Commission March 27, 2017  
Approved by South Carolina Commission on Higher Education May 18, 2017  
Approved by TTC Area Commission March 27, 2018  
Approved by South Carolina Commission on Higher Education April 27, 2018  
Approved by TTC Area Commission May 28, 2019  
Approved by South Carolina Commission on Higher Education August 2, 2019

## **DEFINING AFFIRMATIVE ACTION AND EQUAL EMPLOYMENT OPPORTUNITY**

Affirmative Action is an effort to develop a systematic approach to redress past discrimination. It is a conscious effort to achieve equal employment opportunity for all race/sex groups in a workplace. Affirmative Action is a descriptive term which covers a wide range of progressive and aggressive actions designed to advance groups with a disadvantaged history in society into positions equal to those of groups not similarly disadvantaged. The U. S. Supreme Court has upheld Affirmative Action as a permissible method to reach the goal of fair employment. Affirmative Action is not a quota system. Although Affirmative Action is voluntary and not required by any law, each state agency, college, or university is required to submit a written Affirmative Action Plan to the South Carolina Human Affairs Commission for approval.

An Affirmative Action Plan sets employment goals for minorities and women whose representation in the workforce is less than would be reasonably expected by availability estimates of the qualified labor pool. The Plan also names positive steps the College will take to recruit and employ qualified minorities and women. The Affirmative Action Plan is the guide for a program that should result in fair employment for all race/sex groups.

The goals component of the Plan is not designed to permit unlawful quotas with respect to persons of any race or gender. Rather, the goals target and measure the effectiveness of affirmative action efforts to eliminate and prevent discrimination.

While the goal of equal opportunity principles is to prohibit the consideration of ethnicity and gender, the goal of affirmative action is to identify and remove obstacles that block or impede the equal positioning of women, ethnic and other minorities, and other historically disadvantaged classes.

## **EQUAL EMPLOYMENT OPPORTUNITY/AFFIRMAATIVE ACTION POLICY STATEMENT**

### **8-1-0 Affirmative Action and Non-Discrimination Policy**

**NUMBER:** 8-1-0      **APPROVED DATE:** 08-27-1979

**BASED ON POLICY NUMBER AND TITLE:** SBTCE POLICY 8-7-100 EMPLOYMENT PRACTICES

It is the policy of Trident Technical College that no discrimination on the grounds of race, color, disability, religion, gender, sexual orientation, age, marital status, veteran status, gender identity, pregnancy, or national or ethnic origin will exist in any area of the College. The College will make all decisions regarding recruitment, hiring, training, promotions, and all other terms and conditions of employment without discrimination on the above grounds or on other factors, which cannot lawfully be the basis for an employment decision.

Trident Technical College reaffirms its policy of administering all its educational programs and related supportive services and benefits in a manner which does not discriminate because of a current student's, or prospective student's race, color, disability, religion, gender, sexual orientation, age, marital status, gender identity, pregnancy, or national or ethnic origin, or other characteristics which cannot lawfully be the basis for provision or denial of services.

In addition, Trident Technical College endorses the principle of affirmative action designed to remove any disparate effects of past discrimination because of race, color, gender, sexual orientation, disability, religion, age, marital status, veteran status, gender identity, pregnancy, or national or ethnic origin.

This policy applies to all personnel actions including, but not limited to, recruitment, hiring, compensation, benefits, promotions, transfers, layoffs, recall from layoffs, and educational, social, or recreational programs of the College. The Human Resources Director was appointed Affirmative Action/Equal Employment Opportunity Officer on January 3, 1985. The Affirmative Action/Equal Employment Opportunity Officer will have overall responsibility for implementation of Affirmative Action and will have the full cooperation of all vice presidents, deans, department heads, directors, supervisors, and other employees.

All officials and other employees of this College, as well as various employment agencies, both public and private, labor organizations, and any advertising agency with whom the College may deal, will be informed that Trident Technical College is an Equal Opportunity/Affirmative Action Employer and adheres to all state and federal laws applicable to employment decisions.

Through the policies and programs set forth in this plan, Trident Technical College undertakes to comply fully with all federal and state laws relating to equal educational opportunity, equal employment opportunity, and affirmative action.

Trident Technical College has developed an Affirmative Action Plan to help achieve the goal of equal employment opportunity for all. The Area Commission has reviewed the Plan and has committed to implementing the goals and timetables established in the Plan. The Associate Vice President for Human Resources will have overall responsibility for implementation of the Affirmative Action Plan. These responsibilities include: development of specific goals and timetables, reporting progress to the President, and regular progress reports to the President's Cabinet. Other identified internal and/or external groups will receive progress reports as requested. This Affirmative Action Plan will remain in effect until Trident Technical College has achieved a fair representation of all groups within the work force.

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Moved to Section 8 - MAY 19, 1998

Reaffirmed: 03-21-1995  
Reaffirmed: 09-26-1999  
Reaffirmed: 10-08-2000  
Reaffirmed: 02-19-2002  
Reaffirmed: 12-17-2002  
Modified and Approved: 07-22-2003  
Modified and Approved: 10-22-2004  
Reaffirmed: 09-20-2005  
Reaffirmed: 11-14-2006  
Reaffirmed: 10-27-2007  
Reaffirmed: 03-11-2008  
Reaffirmed: 03-24-2009  
Reaffirmed: 03-23-2010  
Reaffirmed: 03-15-2011  
Reaffirmed: 03-20-2012  
Reaffirmed: 01-15-2013  
Reaffirmed: 01-21-2014  
Modified and Approved: 05-26-2015  
Modified and Approved: 05-24-2016  
Reaffirmed: 05-23-2017  
Modified and Approved: 03-27-2018

As evidenced by the above Trident Technical College policy regarding Affirmative Action, on January 3, 1985, Cabinet appointed the Associate Vice President for Human Resources as the Affirmative Action/Equal Employment Opportunity Officer. The Affirmative Action/Equal Employment Opportunity Officer has overall responsibility for implementation of Affirmative Action and has the full cooperation of all vice presidents, deans, department heads, directors, supervisors, and other employees.



# **RESPONSIBILITIES FOR IMPLEMENTATION OF THE AFFIRMATIVE ACTION / EQUAL EMPLOYMENT OPPORTUNITY PLAN**

## **Overall Responsibilities**

The College President bears the primary responsibility for implementing the College's policies on Affirmative Action and Equal Employment Opportunity. The President must assure that each supervisor, and each employee, is fully aware of the obligations and expectations under these policies by communicating the College's commitment and high level of priority afforded to this plan.

The President, in consultation with the Cabinet and other administrative officers, can establish procedures, but it is also the responsibility of all TTC employees to eliminate discrimination, take affirmative action and provide for equal opportunity in both employment and education.

## **Employment Responsibilities**

### **President**

- ☐ Overall responsibility for implementing the AA/EEO Plan
- ☐ Approves all full-time positions and final candidates
- ☐ Approves salary actions within delegation of authority
- ☐ Works with Human Resources and supervising Vice Presidents to achieve the AA/EEO goals

### **Supervising Vice President**

- ☐ Works with Human Resources to achieve the AA/EEO goals
- ☐ Approves members of the Interview Panel and selects the chairperson
- ☐ Approves requests for new or replacement personnel
- ☐ Conducts reference checks or certifies that the appropriate supervisor has conducted them
- ☐ Reviews hiring packet material to ensure that the interview panel complied with affirmative action efforts
- ☐ Approves final candidate(s) from Interview Panel, and makes recommendations to the President
- ☐ May interview candidates

### **Hiring Manager**

- ☐ Works with Human Resources to achieve the AA/EEO goals
- ☐ Submits requests for the new positions and job descriptions including minimum/preferred qualifications
- ☐ Reviews replacement job descriptions and verifies accuracy with justification
- ☐ Selects the chairperson for the Interview Panel and works with this person to appoint additional members, ensuring diversity
- ☐ Interviews candidates
- ☐ May conduct reference checks

- ☐ Ranks the final candidates and submits to the supervising Vice President

### **Interview Panel Chairperson**

- ☐ Works with Human Resources to achieve the AA/EEO goals
- ☐ Appoints members of the Interview Panel, ensuring diversity
- ☐ Coordinates the review of applications/resumes with the Panel. Provides a summary and a record of interview for candidates who were interviewed.
- ☐ Collects all interview forms and copies of applications/resumes and returns them to Human Resources
- ☐ Encourages compliance with AA/EEO regulations during the interview process
- ☐ Encourages confidentiality by all committee members before, during and after the screening/interview process
- ☐ May conduct reference checks
- ☐ Recommends hiring a candidate using the quantifiable method indicated on the Employment Selection Summary (this may be performed by a designee)

### **Interview Panel Members**

- ☐ Reviews application packets that meet the minimum advertised requirements prior to interview
- ☐ Develops interview questions and participates in the interview process
- ☐ Works with Human Resources to achieve the AA/EEO goals
- ☐ Participates in selections of a candidate using the quantifiable method indicated on the Employment Selection Summary
- ☐ Assists with completing the Record of Interview Forms
- ☐ Maintains confidentiality of conversations and all materials regarding the screening/interviewing process with committee members

### **Associate Vice President for Human Resources**

- ☐ Serves as the College's AA/EEO Officer
- ☐ Recommends changes to policies and procedures related to the equal employment opportunity and affirmative action, communicates College AA/EEO efforts both internally and externally and audits AA/EEO processes. Ensures the hiring managers conduct the hiring processes consistently according to applicable laws.
- ☐ Oversees all paperwork processing for approved new hires and replacements
- ☐ Oversees and coordinates the advertising process
- ☐ Informs each Interview Panel Chair/Hiring Manager of the College's AA/EEO commitment and underutilization status
- ☐ Provides orientation and training to supervisors and selection personnel on hiring procedures
- ☐ Works with the Interview Panel to develop screening criteria, interview questions and scale for rating the candidates
- ☐ Oversees screening of all applicants and presents applicant pool to the hiring manager
- ☐ Reviews material for screening and selection addressing any concerns with the hiring manager
- ☐ Oversees preparation of salary analysis for approval

- ☐ Develops Internal Human Resources procedures to effectively and efficiently coordinate employment practices
- ☐ Maintains and coordinates the advertising process
- ☐ Insures that all correspondence is submitted to applicants in a timely manner and obtains any missing or additional information needed to complete the application process
- ☐ Maintains records for federal, state and institutional reports
- ☐ Responds to complaints of violation of the AA/EEO Plan. Serves as a resource regarding AA/EEO information and grievance processes
- ☐ Tracks EEO information and reviews diversity and applicant pool. If applicant pool is not diversified, consults with supervising Vice President on re-advertising position
- ☐ Prepares the College's AA/EEO Plan and advises and monitors activities and programs relative to implementation of the Plan
- ☐ Coordinates and promotes professional development programs to promote awareness and understanding of AA/EEO
- ☐ Represents the College in matters relative to affirmative action and equal employment opportunity and advises the President, President's Cabinet and other identified internal and/or external groups on progress of the College's hiring goals and issues of concern

## POLICY DISSEMINATION

INTERNAL	Responsible Person	Target Date
College personnel publications contain applicable AA/EEO notices	AVP for HR and Marketing Staff	Ongoing
Employees are informed when the policy statement is updated and/or re-approved	Internal Auditor	Annual
Human Resources reviews the College's underutilization and commitment to hiring goals with the Position Supervisor/Interview Panel Chair	AVP for HR	Ongoing
Provide status of AA/EEO goals to Cabinet	AVP for HR	Quarterly
Review AA/EEO policies and procedures	AVP for HR and Cabinet	Annually
EXTERNAL	Responsible Person	Target Date
Notify appropriate state agencies, state employment agencies, college placement offices to include minority colleges and universities and media of job opportunities	HR Staff	Ongoing
Provide status of AA/EEO goals to the College's Area Commission	AVP for HR	Ongoing

## UTILIZATION AND AVAILABILITY ANALYSES

### Human Affairs Commission Analysis

Trident Technical College provides a chart to the South Carolina Human Affairs Commission of its progress toward meeting Affirmative Action goals during the period of October 1 – September 30, of each year. (See appendix A for a sample)

This chart contains data provided by the College and the South Carolina Human Affairs Commission. Each State agency prepares a similar chart and the South Carolina Human Affairs Commission prepares an annual report, which is submitted to the General Assembly of the State of South Carolina. The annual report examines the progress State government agencies made toward achieving the goal of equal employment opportunity through the Affirmative Action program. An explanation of the categories and numbers appearing on the chart is described below.

### Section One: Equal Employment Opportunity (EEO) Category Codes

This section has codes for groups of employees who perform jobs having similar work content, pay rates and promotional opportunities. Trident Technical College uses the codes E1 through E8 and T1 through T5. When the number of employees assigned to a category is so small as to prohibit establishing goals, more than one EEO category may be combined to create a larger group of employees. Goals are then established for the larger group. A general description of the kinds of jobs assigned to each EEO code follows:

#### E1- Executives:

Includes all employees whose assignments require meeting with the agency head or a designee to set agency policies that affect both internal and external statewide operations. Incumbents are expected to exercise discretion and independent judgment when assessing policy needs and ensuring that policies created are in line with state and federal laws, rules and regulations. Includes all employees whose assignments require the performance of work directly related to management policies and the general business operations of the agency or institution. Employees must perform the above functions and should report directly to the agency director or deputy director. Includes directors, deputy directors, department heads, division directors, regional directors, district directors and unclassified administrative managerial positions.

NOTE: Supervisory personnel of the professional, technical, clerical, skilled craft and service/maintenance workforce will be reported within the specific categories of the personnel they supervise unless they set broad policies described above.

#### E2- Professionals:

Includes all employees required to possess specialized and theoretical knowledge that is usually acquired through college training or work experience and other training that provides comparable knowledge. Includes personnel specialists, social workers, doctors, registered nurses, systems analysts, accountants, counselors, teachers, police captains and lieutenants, classified professional non-faculty employees and kindred workers.

**E3- Technicians:**

Includes employees required to possess a combination of basic scientific or technical knowledge and manual skill that can be obtained through specialized post-secondary school education or through equivalent on-the-job training. Includes computer programmers and operators, draftspersons, surveyors, licensed practical nurses, photographers, radio operators, technical illustrators, technicians (medical, dental, electronic, physical sciences), assessors, inspectors, police and fire sergeants and kindred workers.

**E4- Protective Services:**

Includes employees entrusted with public safety, security and protection of the public from destructive forces. Includes police, patrol officers, fire fighters, guards, deputy sheriffs, bailiffs, correctional officers, detectives, marshals, harbor patrol officers and kindred workers.

**E5- Paraprofessionals:**

Includes employees who perform some of the duties of a professional or technician in a supportive role and who usually require less formal training and/or experience than normally required for professional or technical positions. Such positions may fall within an identified pattern of staff development and promotion under a "New Careers" concept. Includes library assistants, administrative assistants, research assistants, medical aides, child support workers, police auxiliary, welfare service aides, recreation assistants, homemaker's aides, home health aides, and kindred workers.

**E6- Secretary/Clerical:**

Includes employees responsible for internal and external communication, recording and retrieval of data and/or information and other paper work required in an office. Includes bookkeepers, messengers, office machines operators, clerk-typists, stenographers, court transcribers, secretaries, hearing reporters, statistical clerks, dispatchers, license distributors, payroll clerks, and kindred workers.

**E7- Skilled Craft:**

Includes employees performing jobs that require special manual skill and thorough and comprehensive knowledge of the processes involved in the work, which is acquired through on-the-job training and experience or through apprenticeship or other formal training programs. Includes mechanics and repairers, electricians, heavy equipment operators, stationary engineers, skilled machinists, carpenters, compositors and typesetters and kindred workers.

**E8- Service/Maintenance:**

Includes workers performing duties related to the upkeep and care of buildings, facilities, or grounds. Workers in this group may operate machinery. Includes chauffeurs, laundry and dry cleaning operators, truck drivers, bus drivers and garage laborers, custodial personnel, gardeners and grounds keepers, refuse collectors, construction laborers and kindred workers. Includes employees performing duties related to the upkeep and care of buildings, facilities and/or grounds. Employees in this group may operate machinery.

**T1- Executives (Unclassified Institutional Officers):**

Includes unclassified employees whose assignments require very broad executive management and policy-making responsibility on institution-wide areas. Includes employees who work in positions requiring the performance of work directly related to management of policies or general business operations of the institution. It is assumed that assignments in this category customarily and regularly require the incumbent to exercise broad policy making, high level decision making, and very independent and discretionary judgment. They also direct the work of high-level professions. Includes officers holding such titles as President, Executive Vice President, Vice-President Education, Vice-President Business, Vice-President Student Affairs and Vice-President Development.

## **T2- Managerial (Unclassified Level II Education Support Personnel):**

Includes unclassified employees whose assignments require very broad management and policy-making responsibility on an institution-wide basis of a customarily recognized and very broad division or larger unit. Includes employees who work in positions that require the performance of work directly related to the management of the institution or division. It is assumed that assignments in this category customarily and regularly require the incumbent to exercise high level decision making and highly independent judgment, and to direct the work of mid-upper level administrators. Includes positions holding such titles as Dean of Instruction, Dean of Continuing Education, Dean of Students, Dean of Learning Resources II and Educational Support Manager II.

## **T3- Faculty/Administrative/Teaching:**

Includes all unclassified employees whose assignments require both responsibility for management of a customarily recognized academic division/department and whose other assignments are made for the purpose of providing instruction, conducting research, providing learning resources or performing public service. Includes academic deans, assistant deans, division chairpersons, department heads, librarians, program coordinators, and other faculty positions, if their responsibilities are both administrative and instructional or administrative only.

## **T4- Faculty/Teaching:**

Includes all unclassified employees whose specific assignments customarily are made for the purpose of conducting instruction. Includes instructors and vocational teachers. Does not include student teachers or research assistants.

## **T5- Professionals (Unclassified Level I Educational Support Personnel):**

Includes all unclassified employees whose assignments require the direction and supervision of major related sections/departments. Includes positions titled Educational Support Manager I, Assistant Dean of Students, Assistant Dean of Continuing Education and Dean of Learning Resources.

## **Section Two: Workforce Totals**

The information provided in Section Two shows the race/sex totals by number (#) and percentage (%) of persons employed in each EEO category as of September of the reporting year. For purposes of the report, the following race/sex categories are used:

WM - White Males  
BM - Black Males  
OM - Other Males  
WF - White Females  
BF - Black Females  
OF - Other Females

The information showing in the number (#) blocks of section two and six is provided by the College. The percentage (%) of each race/sex group is computed by dividing the number (#) of each race/sex group by the total number of persons in the EEO category. \* = Underutilization less than one whole person.

## **Section Three: Availability**

Availability is an estimate of the percentage of the workforce one reasonably expects to be employed based on an analysis of the qualified labor pool. Availability estimates are reported for three groups: black males, white females and black females. Availability is established for any minority group exceeding two percent of the relevant labor market. No other minority groups, other than those appearing, met the two percent threshold. Historically, there has not been a pattern of “underutilization” of white males in the workforce; therefore, no availability is established for white males. However, to determine the availability of white males, one can total the availability shown in Column 3 for any EEO category and subtract the total from 100 -- the difference will be white male availability. The availability analysis, completed for each job group, is used to determine if minorities or women are “under-represented” in a job group. For example, if an availability analysis shows that 20% of those persons with the required skills for specific job titles listed in a job group are minorities, there is “underutilization” if the College has less than 90% of the 20%, or 18%, available in that job group. The availability analysis is based on eight factors that must be considered, including both internal and external availability data. The South Carolina Human Affairs Commission along with consultation and input from the College collects the statistical data.

## **Section Four: 90% of Availability**

Section Four indicates a rate that is within 90% of what would be expected based on availability estimates. Use of these percentages is only for reasonable benchmark purposes. The fluctuation is to allow for the possibility that the current workforce disparities may be statistically significant.

## **Section Five: Underutilization (90%)**

These figures are a comparison of the availability (based on 90%), and the actual workforce. If the current workforce is less than 90% of availability, then “underutilization” exists. This process is based on statistical fact, not its cause. However, the mathematical



comparison between availability and current workforce may not be the sole consideration in determining “underutilization.”

The underutilization analysis report found in Appendix A indicates the number of people underutilized. Negative numbers indicate that there is no underutilization.

### **Section Six: New Hires and Promotions of the Reporting Year**

This section shows by race and sex the number (#) and percentage (%) of persons who were hired or promoted between October through the following September of the reporting year. The information was obtained and calculated in the same manner as the information in Section Two. Transactions counted in Section Six include positions filled by means of new hires, internal promotions, promotions involving moving from one state agency to a higher job grade in another state agency, reinstatements and transfers from one state agency to another. These transactions have the effect of increasing the representation of race/sex groups in the overall College workforce and within EEO categories.

### **Section Seven: 90% Goals Met**

After completing the availability analysis and the College has identified any “underutilization,” the College must project goals to eliminate the “underutilization.” The goals should not be confused with quotas. They are not rigid and inflexible quotas, but targets that are reasonably attainable through good faith efforts.

The goals component of the plan is not designed to be, nor may it lawfully be, interpreted as permitting unlawful preferential treatment or quotas. Rather, the goals are designed as benchmarks to measure the effectiveness of the plans to eliminate and prevent discrimination. These goals are realistically established based on the availability of qualified applicants.

### **Technical Colleges AA/EEO Ranking**

The South Carolina Human Affairs Commission provides a status of each State agency’s affirmative action program based on the Level of Goal Attainment through various charts.

The following is a summary of Trident Technical College’s Ranking for Goal Attainment for the past five years:

#### Ranking Among all State Agencies:

2018	3 <sup>rd</sup> among 79 agencies
2017	2 <sup>nd</sup> among 79 agencies
2016	2 <sup>nd</sup> among 79 agencies
2015	17 <sup>th</sup> among 79 agencies
2014	3 <sup>rd</sup> among 79 agencies

### Ranking Among all Technical Colleges:

2018	2 <sup>nd</sup> among 16 agencies
2017	1 <sup>st</sup> among 16 agencies
2016	1 <sup>st</sup> among 16 agencies
2015	4 <sup>th</sup> among 16 agencies
2014	1 <sup>st</sup> among 16 agencies

Trident Technical College has ranked in the top ten of all Technical Colleges in South Carolina in its “Goal Attainment” for the past five years. To achieve these high rankings for the past five years is a significant achievement for the College, and indicates a serious commitment to affirmative action/equal employment opportunities.

### **Summary**

An analysis of the College's Annual Report from the South Carolina Human Affairs Commission for the reporting period October 1, 2017 – September 30, 2018, indicates EEO areas remain underrepresented based on established criteria. Listed below are underrepresented EEO Categories and groups:

☐ White Females

E7 and E8 Laborers

☐ White Females

E6 Entry Clerical

☐ White Females

T1, T2, E1 Executive and Managerial

TTC continues to advertise using NeoGov, South Carolina’s on-line recruiting website. We also advertise all open positions, excluding internal postings, in the Post & Courier, the largest circulating newspaper in the Tri-County area. TTC also lists opportunities on the college’s website ([www.tridenttech.edu](http://www.tridenttech.edu)), in the Charleston Chronicle (a minority publication) bi-weekly, and Inside Higher Ed (<https://www.insidehighered.com>) as appropriate. Additional recruiting efforts include working with local community organizations by sending weekly advertisements and actively representing the college at local career fairs.

## **IDENTIFICATION OF AREAS FOR IMPROVEMENT**

Listed below are areas identified for improvement and the improvement plan that the College will implement in an effort to strengthen and promote equal employment opportunities and affirmative action.

### ***Area for Improvement:***

The college is underutilized in white females and ~~AA males~~ in the E6 job group and AA white females E7/E8 EEO job groups.

### **Improvement Plan:**

Conduct an aggressive recruitment search for those positions identified in the AA/EEO Plan as “underrepresented,” utilizing additional publications and outreach efforts when recruiting. The College will utilize the expertise of the President’s Cabinet and other sources to assist in advancing recruitment of minorities and women.

Review applicant tracking reports, which will provide AA/EEO data. Develop a tracking system that evaluates best method(s) of advertising vacant positions.

### **Responsible Party:**

Human Resources Department, Cabinet, and Hiring Manager

### ***Area for Improvement***

Ensure the selection process eliminates any discrimination.

### **Improvement Plan:**

Continuous review of the Hiring Procedure for effectiveness through surveys, evaluations, or interviews with hiring managers and new employees.

The Associate Vice President for Human Resources reviews the College’s affirmative action/equal employment opportunity commitments and underutilization data with each Interview Panel Chair/Position Supervisor.

An evaluation form is included in the hiring packet to gather feedback from the hiring manager/interview panel regarding the hiring process. Continue a process for the effective review and revision of the College’s hiring policies and procedures.

### **Responsible Parties:**

Human Resources Department Cabinet, and Hiring Manager

### ***Area for Improvement***

Continue to require a high level of accountability among Vice Presidents utilizing the performance evaluation process.

**Improvement Plan:**

The President continues to require documentation of each Vice President's efforts in hiring and promotional efforts in his/her area of responsibility. Each Vice President is expected to include a goal attainment report for their division in the evaluation materials submitted for review. Every supervisor within the Vice President's chain of command will be expected to produce the same report and be evaluated similarly.

**Responsible Parties:**

President, Vice Presidents, hiring manager and other supervisors in the chain of command.

***Area for Improvement***

Increase level of communication regarding current goal attainment status to Vice Presidents.

**Improvement Plan:**

The Associate Vice President for Human Resources will continue to report directly to the President regarding matters of affirmation action and equal employment opportunity. The Associate Vice President for Human Resources will continue to present statistics on goal attainment to Cabinet on at least a quarterly basis. Additional information and resources on outreach possibilities will be developed and discussed at these meetings.

**Responsible Parties:**

President, Vice Presidents, and Associate Vice President for Human Resources

***Area for Improvement***

Some departments do not have employees in categories with unmet goals; however, these departments may not be diverse, such as T3 and T4 categories.

**Improvement Plan:**

The Associate Vice President for Human Resources will inform Vice Presidents of these situations when presenting statistics on goal attainment to Cabinet. The Vice President will ensure that this is an additional area of review during the hiring process. The Associate Vice President for Human Resources will work with the hiring manager during the recruiting phase to ensure that additional outreach strategies are discussed and implemented.

**Responsible Parties:**

President, Vice Presidents, hiring manager and Associate Vice President for Human Resources.

## **INTERNAL AUDIT AND REPORTING SYSTEM**

The Human Resources Department has an internal tracking and reporting system for EEO data. Internal tracking and reporting data is compiled for applicants, new hires, promotions/demotions, transfers and terminations.

### **Applicants**

When Human Resources advertises an available position, NeoGov creates an applicant listing, which includes all applicants by name, race and gender. Applicants indicate race and gender on the Employment Application.

The Human Resources Department pre-screens all applications for minimum education and experience requirements. The Human Resources Department then forwards the application packets of all qualified applicants to the Hiring Manager along with an applicant listing. If the applicant pool is not diverse, the Human Resources Department, in consultation with supervising Vice President and Hiring Manager, will make a determination as to whether or not to re-advertise the position.

Once Human Resources identifies a pool of qualified applicants, the Hiring Manager reviews the applications and selects which candidates to interview. If the interview pool is not diverse, the Human Resources Department will consult with the Interview Panel Chair to determine why minority/female applicants were not selected. After the selection process is complete, the Hiring Manager submits a hiring packet to Human Resources. The hiring packet includes applications for interviewed candidates, Record of Interview Forms, Employment Recommendation Form, Applicant Listing and an Employment Selection Summary, which includes a quantified justification for hiring a particular candidate, rather than the other candidates interviewed.

A compilation of all applicant data is transferred to the Applicant Listing. The tracking report provides a summary of the applicants and the information is used to complete the annual Applicant Report to the South Carolina Human Affairs Commission. In addition, this information may be used in preparing status reports for various internal and external sources.

### **New Hires, Promotions/Demotions, Transfers and Terminations**

The Human Resources Department maintains EEO records for new hires, promotions/demotions, transfers and terminations. The Associate Vice President for Human Resource presents a quarterly EEO report to the President and Cabinet. In October, the Applicant Report, along with the College's current workforce, number of New Hires and Promotions Report are submitted to the South Carolina Human Affairs Commission for its review.

### **Hiring Procedure**

The Trident Technical College procedure regarding employment and personnel records is available at [https://www.tridenttech.edu/about/policies/8\\_hr/8-1-1.htm](https://www.tridenttech.edu/about/policies/8_hr/8-1-1.htm)

## **AFFIRMATIVE ACTION PLAN SUPPORT DOCUMENTS**

The following supporting documentation is available and accessible for review:

Trident Technical College Employee Handbook  
Trident Technical College Policy and Procedure Manual  
Organizational Charts  
Evaluation Documents (FPMS and EPMS)  
Employment Application  
EEO/AA Policy Statement  
Trident Technical College Hiring Procedure  
Annual Report to the General Assembly - South Carolina Human Affairs Commission

### **Laws Governing Affirmative Action and Equal Opportunity Equal Pay Act of 1963:**

Purpose: Makes it unlawful to pay wages to members of one gender at a rate lower than paid members of the other gender for equal work on jobs that require equal skill, effort and responsibility under similar working conditions in the same establishment.

### **1964 Civil Rights Act:**

This most significant piece of federal EEO legislation includes:

**Title VI:** Prohibits discrimination based on race, color or national origin in federally assisted programs. It does not specifically ban employment discrimination based on gender, but some federal agencies nonetheless have barred such discrimination in their regulations.

**Title VII:** Prohibits employment or membership discrimination by employers, employment agencies and unions on the basis of race, color, religion, sex or national origin.

**Title IX:** Attorney General to intervene in civil rights cases of general public importance.

**Title XI:** Miscellaneous provisions, including the right to jury trial and the prohibition against double jeopardy.

**The Age Discrimination in Employment Act of 1967:** Prohibits, in general, discrimination against employees or applicants for employment between 40 and 70 years of age, subject to exception for employees covered by collective bargaining contracts.

**The Age Discrimination Act of 1975:** Prohibits "unreasonable discrimination on the basis of age" by recipients of federal financial assistance, including revenue-sharing funds.

**Title I of the Civil Rights Act of 1968:** Provides criminal penalties for interference with an individual's employment rights because of his or her race, color, religion or national origin.

**Title I of the Education Amendments of 1972:** Prohibits sex discrimination in education programs or activities that receive federal financial assistance.

**The State and Local Fiscal Assistance Act of 1972:** State and local governments receiving federal revenue sharing are not to discriminate in employment on the basis of race, color, national origin, sex, religion, age or handicapped status.

**The Vocational Rehabilitation Act of 1973:**

**Section 503:** Requires federal contractors to take affirmative action to employ and promote qualified handicapped persons.

**Section 504:** Prohibits discrimination against handicapped persons in any program or activity receiving federal financial assistance.

**The Vietnam Era Veteran's Readjustment Assistance Act of 1974:** Requires employers with government contracts of \$10,000 or more to take affirmative action to employ and advance disabled veterans and qualified veterans of the Vietnam era.

**The Civil Rights Attorney's Fee Awards Act of 1976:** Provides attorney's fees under various civil rights statutes.

**Pregnancy Discrimination Act of 1978:** Prohibits discrimination in employment against women affected by pregnancy or related conditions.

**Americans with Disabilities Act of 1990:** Protects people who are disabled. An employer cannot discriminate against disabled people who can perform the essential functions of a job, and are required to make reasonable accommodations to allow them to do so, if necessary. The law protects both job applicants and employees.

**The Civil Rights Act of 1991:** This Act amends Title VII of the Civil Rights Act of 1964, Sect. 1981 of the Civil Rights Act of 1976, the Attorney's Fees Awards Act of 1976, the Americans with Disabilities Act of 1990 and the Age Discrimination in Employment Act of 1967. It addresses such subjects as disparage impact, business necessity, bias after hiring, challenges to consent decrees, timeliness of challenges to seniority systems, mixed-motive damages, jury trials, interest and filing time in actions against the federal government and "race harmony" of test scores.

**Executive Order 11246:** Requires Federal contractors to include a nondiscrimination clause in all contracts and subcontracts in excess of \$110,000 and all construction projects financed, even in part, with Federal funds. Revised Order No. 4 requires a written affirmative action program from contractors with 50 or more employees and contracts of \$50,000 or more. This order is enforced by the U. S. Department of Labor.

**South Carolina Human Affairs Law:** Prohibits discrimination based on race, religion, color, age, sex, disability and national origin.

**Sexual Harassment:** The Equal Employment Opportunity Commission (EEOC) has defined sexual harassment as unwelcome sexual advances, request for sexual favors, and other verbal or physical conduct of a sexual nature when:

Submission to such conduct is a condition for employment and/or promotion; submission to or rejection of such conduct is used as the basis for employment; and/or such conduct has the purpose or effect of interfering unreasonably with the individual's work performance, or creates an offensive, hostile, or intimidating working environment.

Sexual harassment has been recognized as a form of sexual discrimination prohibited by Title VII of the Civil Rights Act of 1964 and by all state fair employment practice acts.



# APPENDIX A

Trident Technical College																																						
President: Dr. Mary Thornley																																						
EEO Officer: Devetta Williams Hughes																																						
EEO CATEGORY	1										2										3				4				5				6					
	ACTUAL WORKFORCE ON 09/30/2018										Adjusted Availability% (Qualified Labor Pool)										UNDERUTILIZATION				HIRES AND PROMOTIONS - 10/01/2017 - 09/30/2018				% OF Goals Met Based on Adjusted Availability									
	#	%	WM	BM	OM	WF	BF	OF	TOTAL	BM	WF	BF	OF	BM	WF	BF	OF	TOTAL	BM	WF	BF	OF	TOTAL	BM	WF	BF	OF	TOTAL	BM	WF	BF	OF	TOTAL	BM	WF	BF	OF	TOTAL
T1, T2 and E1	6	31.6	1	5.3		7	26.3		19	4.2	40.5	14.2		NO	3.7	NO			1	100.0									1	100.0	YES					90.9%	YES	
T3 and T4	99	36.9	14	5	119	20	11	268		3.5	33.5	4.4		NO	NO				3	15.0			15	1	20			1	100.0	YES					YES	YES		
T5 and E2	42	20.4	22	6	73	56	7	206		7.0	32.7	17.5		NO	NO				5	13.9	16.7		12	13	36				100.0	YES					YES	YES		
E3 and E5	21	7	7	1	44	19	4	96		5.6	44.9	11.3		NO	NO				7	25.0	3.6	32.1	8	2	28			7.1	100.0	YES					YES	YES		
E4	7	31.8	31.8	9.1	9.1	13.6	4.5	100.0		13.8	8.5	4.0		NO	NO				2	33.3	16.7	33.3	1	6					100.0	YES					YES	YES		
E6	2	6.5	6.5			13	13	31		6.2	53.9	19.3		NO	12.0				2	20.0	10.0		3	1	10			1	100.0	YES					77.7%	YES		
E7 and E8	15	31.9	31.9	6.4	8.5	17.0	4.3	100.0		18.2	10.0	12.3		NO	1.5	NO			3	27.3	18.2	9.1	4	1	11				100.0	YES					85.0%	YES		

**NOTE:** See section entitled "Understanding the Report" for a detailed explanation of how the above information was computed.

**LEGEND:** WM = White Male BM = Black Male OM = Other Male T = Total % = Percentage

WF = White Female BF = Black Female OF = Other Female # = Number

*If an agency is not employing any race/sex group at a rate equal to the Adjusted Availability percentage, the underutilization is noted in Column # 4.*

\*No goal established because the underutilization is less than one whole person.

Level of Goal Attainment for 2016: 99.0 percent  
 Level of Goal Attainment for 2017: 99.2 percent  
 Level of Goal Attainment for 2018: 97.8 percent