



STRATEGIES TO INCREASE DIVERSITY OF STUDENTS  
AND EMPLOYEES

**Gateway Technical College  
Office for Equal Opportunity and Civil Rights**

Prepared by Josh Vollendorf, MS, MSE, CHRS

**June 2019-May 2020**

## Gateway's commitment to equal opportunity and diversity

Gateway Technical College is committed to creating a culture where diversity, in all of its forms, is respected and valued. The college has a comprehensive policy (H-110: Equal Opportunity, Civil Rights, and Sexual Misconduct) that prohibits all forms of illegal discrimination and established the Office for Equal Opportunity and Civil Rights to provide prevention and awareness training, consultation services, and complaint investigation and resolution.

Gateway adheres to all federal and state civil rights laws prohibiting discrimination in employment and in public institutions of higher education.

The College will not discriminate against any employee, applicant for employment, student or applicant for admission on the basis of race, color, national origin, ancestry, sex, sexual orientation, creed, religion, political affiliation, marital status, parental status, pregnancy, disability, age, membership in any reserve component of the armed forces, union affiliation, arrest and conviction record, or any other protected category under applicable local, state or federal law, including protections for those opposing discrimination or participating in any resolution process on campus or within the Equal Employment Opportunity Commission or other human rights agencies.

This policy covers nondiscrimination in employment and in access to educational opportunities. Therefore, any member of the campus community who acts to deny, deprive or limit the educational or employment access, benefits and/or opportunities of any member of the campus community, guest or visitor on the basis of their actual or perceived membership in the protected classes listed above is in violation of Gateway's policy on nondiscrimination. When brought to the attention of the College, any such discrimination will be appropriately addressed and remedied by the College according to the Equity Resolution Process. Non-members of the campus community who engage in discriminatory actions within Gateway's programs or on College property are not under the jurisdiction of this policy, but can be subject to actions that limit their access and/or involvement with the College. All vendors serving the College through third-party contracts are subject by those contracts to Gateway policies and procedures, in addition to any in place through their employment.

*-Gateway's policy on non-discrimination and equal opportunity.*

## Affirmative Action Plan

The Office for Equal Opportunity and Civil Rights develops and monitors the annual affirmative action plan. This plan is fully compliant with federal affirmative action requirements and uses several forms of analysis to evaluate utilization and adverse impact. The adverse impact analysis is used by enforcement agencies and the courts to determine if there is disparate impact (unintentional) discrimination and disparate treatment as a result of policies, practices, and procedures of an organization.

## Development and use of Goals

Placement (hiring and promotion) goals are established based on statistical analysis under an affirmative action plan. This is distinct from the idea of promoting diversity through equal opportunity. When there are no specific goals or barrier removal based on adverse impact under an affirmative action plan, the college can and should continue to promote diversity and

equal opportunity in all of its programs and operations. As with placement goals, diversity strategies must comply with federal laws such as the 1964 Civil Rights Act and the Wisconsin Fair Employment Act.

Specifically, federal law, 41 CFR Section 60-2.16(e), requires the following in regard to goals:

1. Placement goals are neither rigid or inflexible quotas, nor are they considered to be either a ceiling or a floor for the employment of particular groups.
2. All employment decisions are made in a nondiscriminatory manner. Placement goals are not used to extend a preference to any individual, select an individual, or adversely affect an individual's employment status on the basis of that person's race, color, religion, sex, sexual orientation, gender identity, or national origin.
3. Placement goals do not create set-asides for specific groups, nor are they intended to achieve proportional representation or equal results.
4. Placement goals are not used to supersede merit selection principles.

In addition, prior to considering race-conscious programming, government organizations must first implement and document the use of race-neutral measures that have proven to be ineffective. Any race-conscious program instituted by a government entity, including public institutes of higher education, will be evaluated by the courts using the strict scrutiny test (*Regents of the University of California v. Bakke*, 438 U.S. 265 [1978]). The strict scrutiny test involves the following:

1. The program must be justified by a compelling governmental interest. This concept refers to something that is necessary or crucial for the functioning of the state, rather than just something that the state wants. An example of a compelling governmental interest would be national security. Whether or not the state has a compelling governmental interest in the incorporation of minority students in places of public education is a key question in any affirmative action case coming before the court.
2. The law or program must be narrowly tailored to achieve the state's compelling governmental interest. For example, even if the court found that states had a compelling governmental interest in incorporating minority students, the state would have to demonstrate that its program only incorporated eligible candidates. A person could not be admitted to an institution of higher education simply because of his racial background.
3. The law or program must use the least restrictive means for achieving the state's compelling governmental interest; that is, there cannot be a less restrictive way to effectively achieve the compelling governmental interest.

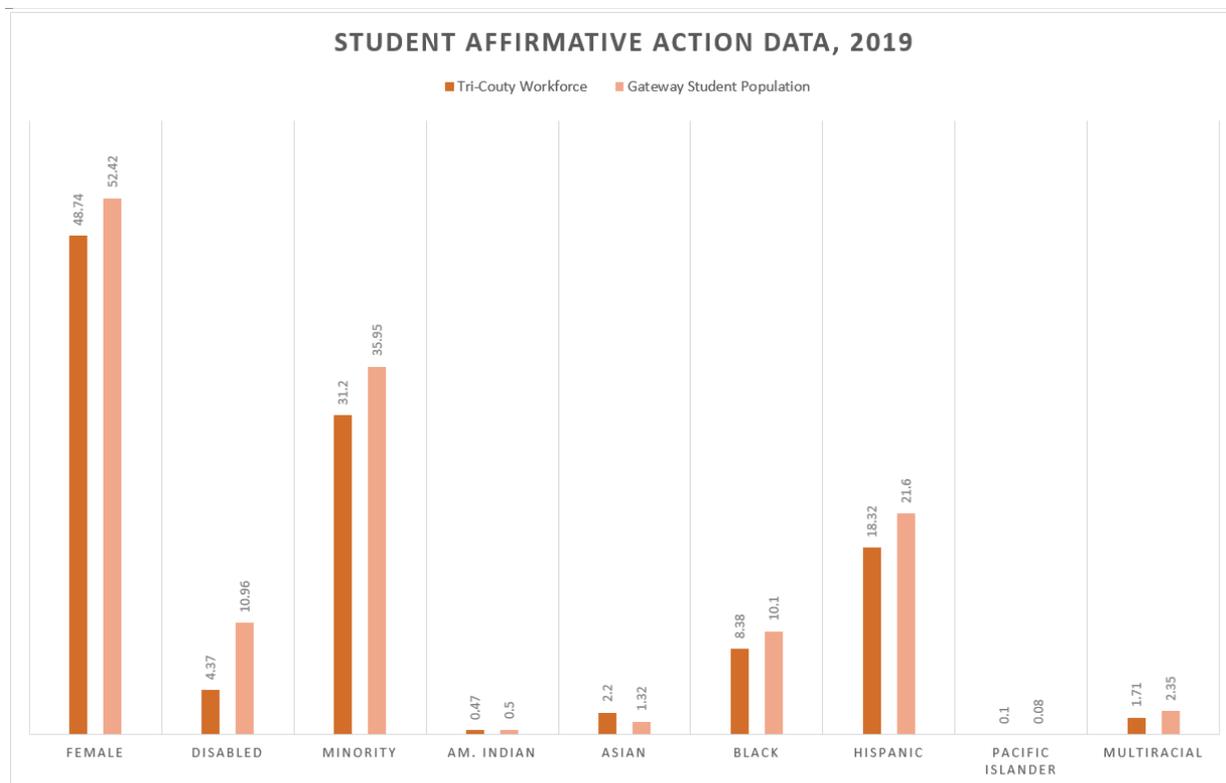
Gateway's efforts to increase employee and student diversity, apart from its affirmative action program, meet these requirements.

## Promoting Diversity of Students and Employees

Gateway has undertaken numerous initiatives to increase the diversity of the student body and employees. While numerous initiatives are underway, the following are those that have the largest impact on removing barriers and increasing opportunity.

### Gateway's student body

Gateway's student body is diverse and representation among all groups, with rare exception, meets or exceeds representation in the tri-county district. As a result, goals are not established for any group.



Tri-county workforce data includes all individuals in the Walworth, Kenosha, and Racine Counties between ages 16 and 65.

Current student population is representative of the community. The college recognizes that there are equity gaps relating to persistence and retention, especially among black/African American and Hispanic students. The college is currently studying this issue to develop additional, targeted programming to address these issues.

### Diversity Actions

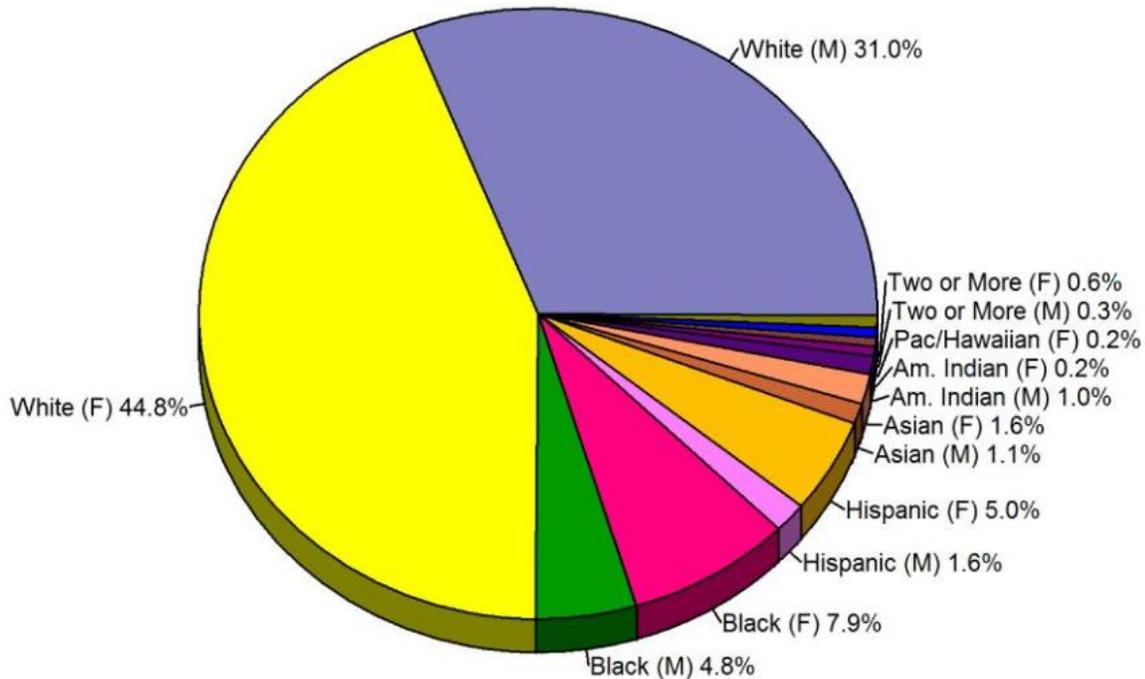
The following table identifies Gateway's actions to increase student diversity and improve retention.

Current initiatives	Future initiatives
<p><b>Pathway Credentials:</b> Career Pathways include short-term, stackable credentials that lead to a degree and jobs in high-demand industries. Students are able to complete fewer classes to obtain credentials to enter the workforce sooner.</p>	<p><b>Multiple Measures:</b> Multiple measures are used to determine math and English course placement rather than relying solely on a single placement exam. This more accurately places students in the</p>

Current initiatives	Future initiatives
	correct class to increase performance and reduce unnecessary classes.
<b>Marketing:</b> Gateway’s student marketing includes a focus on diverse representation in marketing materials and non-traditional occupations.	<b>Review of admission requirements:</b> A comprehensive review of program specific admission requirements to remove unneeded elements and barriers to admission.
<b>Student Support Services:</b> Gateway offers a plethora of support services for all students, including multicultural services, learning success coaching, tutoring services, disability support services, student support counseling, non-traditional occupation support services, career and employment services, academic development programs, and veteran services.	<b>Open Educational Resources (OER):</b> OERs are free resources used in a course in the place of textbooks. This removes a significant financial barrier (textbooks) for many students, especially those who are economically disadvantaged.
<b>Financial literacy:</b> In addition to providing basic financial literacy services, this program helps students understand student loans and finance options.	<b>Scholarship Day:</b> Better promotion of foundation scholarships so that more students who need financial aid are aware of the available scholarships.
<b>Scholarships:</b> Over \$200,000 is awarded in non-academic scholarships each year through the Gateway Foundation. Several scholarships are available for student from specific populations to support retention and address financial needs.	<b>On-site interviews:</b> Bringing employers to campus to talk about their companies and jobs so that students can see future opportunities. This will allow students to see a possible tangible goal at the end of their education.
<b>Staff diversity:</b> Gateway’s staff and faculty is diverse which allows them to relate to students and students to identify with employees.	<b>First Year Experience Course:</b> Research shows that a first year experience course increase persistence and retention.
<b>High school outreach:</b> New Student Specialist work directly in and with each high school in the district to increase awareness of Gateway’s programs and the benefits of technical education programs. Through this outreach, thousands of high school students tour Gateway campuses/programs each year.	<b>Faculty Early Alert Portal:</b> This program will allow faculty to send referral to student services for students who are experiencing personal or academic issues. The program will then connect the student to the appropriate support service to increase retention.
<b>Removal of the computer skills assessment:</b> This action removed a barrier to program entrance and was determined not to be indicative of program success.	<b>Adult Promise:</b> This program would be similar to the student promise program, but focused on the adult population.
<b>The Gateway Promise:</b> The Promise Program, with its needs-based requirement, provides economically disadvantaged youth to receive financial assistance, case management, and other support programming to increase persistence and retention.	<b>Financial Literacy Plan:</b> Moving beyond a financial literacy class, the financial literacy plan would be a requirement for students. The goal would be to help students reduce reliance on federal loans.

## Gateway's Employees

Gateway's employee population is diverse. The affirmative action plan did not identify any action items or placement goals as employee representation was close to, met, or exceeded the availability in the workforce.



## Diversity Actions

The following table identifies Gateway's actions to increase employee diversity and equal opportunity.

Current initiatives	Future initiatives
<b>Removing barrier to employment:</b> By reviewing the minimum qualifications for positions and removing excessive or unnecessary qualification, the applicant pool is increased in number and diversity.	<b>Bias training:</b> Subject matter review team members and interview team members will be trained on implicit bias as well as advanced interview techniques. This training will include a review of best practices and legal considerations of interviewing.
<b>Reviewing advertising resources:</b> Gateway continuously reviews the diversity of employment advertising as well as the effectiveness of each resource.	<b>Pre-boarding:</b> This process will engage prospective candidates while the human resource process continues. This will prevent a loss of qualified applicants during this waiting period.
<b>Sourcing:</b> Jobs are sourced from diverse resources to cast the widest possible net of applicants.	
<b>Review and interview teams:</b> The subject matter review and interview teams are diverse and	

<b>Current initiatives</b>	<b>Future initiatives</b>
include males and females, different racial groups, and individuals from different positions.	