

# CCCCO Equal Employment Opportunity (EEO) Plan Feedback Form

Name of District:	Grossmont-Cuyamaca CCD
District Contact (name, title, email):	Michael Z. Salvador, J.D., Diversity, EEO & Title IX Coordinator, Michael.Salvador@gcccd.edu
Year 1 Submission Date:	December 15, 2024

#### **Information for Districts**

The EEO Plan Feedback Form is the official document used by the Chancellor's Office to evaluate EEO Plan submissions. Each section of an EEO Plan, with special attention to Component 13, will be assessed by reviewers as outlined below. Reviewers were trained to determine the appropriate level of feedback and/or recommendations to be provided to the districts.

- The objective for a 'highly competent' EEO Plan is to have only the "No Feedback" boxes checked in relation to each component and each applicable Component 13 pre-hiring, hiring, and post-hiring strategy.
- For any sections marked as either "Minimal Feedback" or "Extended Recommendations," districts are strongly encouraged to give serious consideration to comments and/or to incorporate suggestions provided by the Chancellor's Office, as appropriate, before they submit their final EEO Plan to their local board for adoption.

#### **Instructions for Reviewers**

For each component or strategy listed in a district's EEO Plan submission, check the box to indicate the level of feedback to be provided.

- Extended Recommendations: A check in the "Extended Recommendations" box indicates that a component or strategy may benefit from substantial changes to its scope. Extended recommendations may be provided for various reasons (e.g., a district plans to implement a program that is inconsistent or misaligned with district data, plans are not evidence based and/or unsupported by research, outdated terminology inconsistent with current DEIA language is used, activities are frivolous or inappropriate for the purpose of the grant). Reviewer comments should include a statement outlining the reviewer's concerns and a narrative describing how districts can respond accordingly.
- **Minimal Feedback**: A check in the "Minimal Feedback" box indicates that a component or strategy may benefit from minor updates, greater attention to detail, or slight modifications. Feedback may include, for example, a point of clarification, a correction, or the explanation of a disagreement with a mechanism proposed for strategy implementation.

- **No Feedback**: A check in the "No Feedback" box indicates a satisfactory plan that elicits no reviewer comments. Reviewers should type the word 'none' in the grey box to reinforce the selection of the "No Feedback" option.
- Leave any additional comments for each section in the corresponding text box at the end of each section.

Special Instructions for EEO Plan Component 13 Strategies

- N/A: If a district did not indicate use of a particular strategy listed in the EEO Component 13 template, reviewers should leave the corresponding check boxes blank and type 'N/A' in the grey comment space.
- If a district included an original, district-specific strategy—a strategy that is not listed on the EEO Plan Component 13 template—type the strategy into the appropriate cell on the form, mark the check box, and fill-in the comment space as necessary.

Example				
	No	Minimal	Extended	
Post-Hiring Strategies	Feedback	Feedback	Recommendations	
Conduct campus climate surveys & use				
this information. (53024.1(a))				
N/A				
Conduct exit interviews & use this		$\boxtimes$		
information. (53024.1(b))				
Clarify the tool through which exit interview	ws will be co	nducted and	recorded.	
Professional development, mentoring,			$\boxtimes$	
support and leadership opportunities for				
new employees. (53024.1(e))				
No specific plans for PD, mentoring, suppor	rt, and/or lea	dership oppo	rtunities were	
submitted though the district indicated inte	nt to engage	with this stra	itegy. District	
should describe the explicit programs, oppo		-		
professional development, mentoring, suppo	ort, and/or le	adership opp	ortunities.	
Timely and thoroughly investigate all	$\boxtimes$			
harassment & discrimination complaints				
& take appropriate corrective action in all				
instances where a violation is found.				
(53024.1(h))				
None				
If needed: list and evaluate district-specific, original post-hiring strategies below				
	No	Minimal	Extended	
Post-Hiring Strategies	Feedback	Feedback	Recommendations	
Click or tap here to enter text.				
Click or tap here to enter text.				

Proceed to the next page to begin assessing Components 1 through 12

Components 1-12	No Feedback	Minimal Feedback	Extended Recommendations
Component 1: Introduction. [Recommended]	<b>V</b>		
None			
Component 2: Definitions. (53001)		<b>V</b>	
[Recommended]			_
The district is advised to update definit	ions per § 53	001.	
Component 3: Policy Statement. (53002) [Recommended]	<b>✓</b>		
None			
Component 4: Identification of District Officer with Delegated Responsibility and Authority to Implement and Enforce the EEO Plan. 53003(c)(3) [Required]		<b>7</b>	
To accurately reflect the requirements of the EEO regulations, the district is advised to add the following after the paragraph under "Board of Trustees":			

The Governing Board is responsible for adopting a Plan that is in compliance with the provisions of the California Code of Regulations. Further, the Board of Trustees will oversee the Chancellor's responsibility to ensure the EEO Plan shall:

- a. Be developed in collaboration with the District's Equal Employment Advisory Committee;
- b. Be reviewed and adopted at a regular meeting of the Board of Trustees where it is agendized as a separate action item; c. Cover a period of 3 years, after which a new or revised plan shall be adopted; and
- d. Be submitted to the State Chancellor's Office at least 90 days prior to its adoption. Comments received from the Chancellor's Office on the proposed plan must be presented to the governing board prior to adoption." See Section 53003 (a) and Section 53020 (a).

Component 5: EEO Advisory Committee. 53005 [Recommended]		7			
The district is advised that the first sentence of the first paragraph should state "GCCCD has established to assist in the development, implementation, monitoring, and, revision its Plan. Note that both the committee and the board are required to take the training.  Be advised that the third paragraph must read, "The committee shall include a diverse membership" per Section 53005.					
Component 6: The Procedure for Filing Complaints Pursuant to Section 53026. 53003(c)(4) [Required]		<b>7</b>			
The district is advised that Section 59300 et seq., now reads: "Complaints alleging violations of this subchapter may be filed against a district by any person using the procedures for employment-related complaints authorized by subchapter 5, commencing with Section 59300." Section 59300 does not require the complainant to submit a written signed complaint or use a specific form. An EEO complaint can be based on conduct that is not discriminatory.					
Component 7: The Process for Notifying All District Employees of the Provisions of the EEO Plan and District Policy Statement. 53003(c)(5) [Required]	✓				
None					
Component 8: The Process for Ensuring that District Employees Who Participate on Screening or Selection Committees Receive Training. 53003(c)(6) [Required]		✓			
The district is highly encouraged to follow the Model Plan Template including alignment with the Plan's format of Components 8 and 9.					

Component 9: The Process for Providing Annual Written Notice to Community-Based and Professional Organizations. 53003(c)(7) [Required]		<b>V</b>		
Feedback here refers to the district's Component 9 "Training for Screening Committees" (pg 33). The district is advised to add "screening, interviewing, and hiring of applicants" to ensure the first sentence reflects the current EEO regulations. Section 53024 requires, "Screening committees shall include a diverse membership whenever possible, to ensure a variety of perspectives are included in the assessment of applicants."				
Component 10: A Process for Gathering Information and Periodic Longitudinal Analysis of the District's Employees and Applicants. 53003(c)(8) [Required]		V		
The detailed data analysis and identification of Underrepresentation (UR) and Adverse Impact for overall employment and across job categories in Component 11 is well noted. The district is encouraged to consider modifying the highlights on Page 49, of the "most underrepresented" to include "all underrepresented monitored groups" in order to prioritize addressing any underrepresentation found.  The district is advised to add 'non-binary options" to the second and fifth paragraphs on page 23, and consider changing "his or her" to "their."				
The data dashboard link provided in the r	esponse is inc	correct or broke	en.	
Component 11: A Process for Utilizing Data to Determine Whether Monitored Groups Are Underrepresented Within District Job Categories. 53003(c)(9) [Required]		<b>V</b>		
The district is highly encouraged to follow the EEO Model Component 13 Template for documenting the three year action plan. Starting on page 46 the response to Component 11 combines Component 12 and 13 strategies with a timeline of implementation activities, however identified responsible staff and effectiveness metrics are missing. Additionally, the strategies included are not broken down into Pre hiring, Hiring, and Post hiring categories.				
It is not clear whether the UR analysis is using the 80% test. For example at page 42 it states Whites are UR in Executive/administrative positions with 52.8% GCCCD total compared to GCCCD Boundary at 57.7%. However, this is 91.5% of projected UR, since this is not below 80% of projected representation this group is not UR. Please check your numbers to ensure the 80% test is used to determine UR.				
The district is encouraged to review the EEO Data Modules and update this section. The district is highly encouraged to address all identified UR and to identify strategies that uniquely address all UR.				

Component 12: Methods for Addressing Underrepresentation. 53003(c)(10) [Required]		Ø	
The district is advised to review pages Handbook, for examples for internship outline Cluster Hiring strategies. The dithe plan.	and mentors	hip programs	and pages 38-41 which
Additional Comments			

Proceed to the next page to begin assessing Component 13 Pre-Hiring Strategies

Note: Should a submission have more than 13 components, enter the component number and name into the Additional Plan Components form located after the Component 13 Post-Hiring Strategies section. Assess each component in accordance with the instructions for review.

Component 13 Feedback			
	No	Minimal	Extended
Pre-Hiring Strategies	Feedback	Feedback	Recommendations
Provide training to employees, students & trustees.* (53024.1(d)) *This applies if you are planning training that goes beyond mandatory training for hiring committees.			
N/A. See feedback related to the three y feedback on page 6 and below on page	15.		Under Component 11
Convey in publications and website the district's commitment to diversity & EEO. (53024.1(j))			
N/A			
Review and update District EEO/DEI policy statement.* (53024.1(k)) *Cross-reference Plan Component 3			
N/A			
Providing EEO/diversity enhancement resources and assistance to other districts. (53024.1(m))			
N/A			

Addressing diversity issues in a transparent and collaborative fashion. (53024.1(o))			
N/A			
Recurring activities related to improving student access and student success—with a nexus to EEO hiring.			
N/A			
Inclusion of (lawful) EEO deliverables in CEO and other administrator performance goals.			
N/A			
If needed: list and evaluate original, district-specific, pre-hiring strategies below			
Pre-Hiring Strategies	No Feedback	Minimal Feedback	Extended Recommendations

## **Additional Comments**

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		 _
Additional Comments		

	No	_Minimal	Extended
Hiring Strategies	Feedback	Feedback	Recommendations
Consistent and ongoing training for hiring committees. (53024.1(c)) *Cross reference Plan Component 8.			
N/A			
Maintain updated job descriptions and job announcements. (53024.1(f))			
N/A			
Board of trustees receives training on elimination of bias in hiring and employment at least once every election cycle. (53024.1(g))			
N/A			
Assess "sensitivity to diversity" of all applicants. (53024.1(I))			
N/A			

Maintaining updated curricula, texts, and/or course descriptions. (53024.1(n))		
N/A		
Dedication of specified staff to EEO.		
N/A		
Incentives for hard-to-hire areas/disciplines.		
N/A		
Focused outreach and publications.		
N/A		
Procedures for addressing diversity throughout hiring steps and levels		
N/A		

Recruitment efforts and strategies such as:  • Use of demographic data  • Job Fairs  • CCC Registry  • Relationships with external organizations & colleges  N/A			
If needed: list and evaluate origina	al district or	oogifia hiring	atratagios bolow
ii needed. list and evaluate origina	No	Minimal	Extended
Hiring Strategies	Feedback	Feedback	Recommendations
Additional Comments			

Post-Hiring Strategies	No Feedback	Minimal Feedback	Extended Recommendations
Conduct campus climate surveys &	reedback		Recommendations
use this information. (53024.1(a))			
N/A			
Conduct exit interviews & use this information. (53024.1(b))			
N/A			
Professional development, mentoring, support and leadership opportunities for new employees. (53024.1(e))			
N/A			
Timely and thoroughly investigate all harassment & discrimination complaints & take appropriate corrective action in all instances where a violation is found. (53024.1(h))			
N/A			

Survey applicants who decline offers & use the information. (53024.1(p))			
N/A			
Describe strategies developed to address any adverse impact identified in the process of carrying out the requirements of Component 10 of the EEO Plan.			
N/A			
Describe strategies developed to address any underrepresentation identified in the process of carrying out the requirements of Components 11 & 12 of the EEO Plan.			
N/A			
If needed: list and evaluate original district-specific, post-hiring strategies below			
Post-Hiring Strategies	No Feedback	Minimal Feedback	Extended Recommendations

Additional Comments			
The district is highly encouraged to review the following resources.			
EEO Data Modules: https://vrccdn.cccco.edu/vrccdnpublic/email-campaigns/link-follows.html?&cn=Vision+in+Action +PDE&cs=VIAPDE+1%2F26%2F23⪙=CCC+EEO+Plan+Data+Analyses+Curriculum&red rect=https%3A%2F% 2Fcccpln.csod.com%2Fui%2Flms-learning-details%2Fapp%2Fcurriculum%2F8c6914b8-653f-4cc2-816b-91cdc17957c1 Side-by-Side Comparison of Old vs. New EEO Plan Requirements (PDF):			
https://www.cccco.edu/-/media/CCCCO-Website/docs/general/side-by-side-changes-to-eeo-regs-v3-a11y.pdf? la=en&hash=7B5BE11E6D881AEED6732705A354FDC4F3D5F088			
Appendix A - EEO Plan Component 13 template (MS Word): https://www.cccco.edu/-/media/CCCCO-Website/Office-of-General-Counsel/appendix-a-eeo-plan-component-13-templat e-final-a11y.docx?la=en&hash=D4A7260818F92FA903A1E128E7D52D3B4240DAF0			
Developing an Effective EEO Plan Webinar recording: https://cccconfer.zoom.us/rec/play/tuGrdgTd40GF0iTFEeJ6iAHL26bp1Kb0ad0nRPb83Fprumtt5MQn_mdbRAXUQ6FOS 86CGt6W_5ObyuhbGLGUZNJYUIFcJxC? canPlayFromShare=true&from=share_recording_detail&startTime=1693422002000&componentName=rec-play&originR equestUrl=https%3A%2F%2Fcccconfer.zoom.us%2Frec%2Fshare% 2Fk5jOOWkXBFesQTM0h_5knFRfOh-4tkrcPWk3gN4IFrQ0jume265EJxSucVudAfYk.WwVioP8Imps_q%3FstartTime %3D1693422002000			
2022 EEO Diversity Best Practices Handbook (PDF): https://www.cccco.edu/-/media/CCCCO-Website/docs/report/cccco-eeoreport-062022-a11y.pdf? la=en&hash=058FE2BE64503C9FEE2FF37E8E0BFB04F2ED5346			

Additional Plan Components (if applicable)	No Feedback	Minimal Feedback	Extended Recommendations
Component			
Component			
Component			
Component			
Component			
Component			
Component			
Additional Comments			

Signatures			
Reviewer Signature:	Dahir Nasser (Feb 21, 2024 23:07 GMT+3)		Feb 21, 2024
Reviewer Signature:	Arturo Ocampo (Feb 21, 2024 14:12 PST)	Date:	Feb 21, 2024
DEIA Strategy Consultant Signature:	Krystal Henderson (Feb 21, 2024 17:25 PST)	Date:	Feb 21, 2024

## **Comments:**

Congratulations on the excellent work your institution is embarking on, the detailed feedback is intended to enhance impact of EEO efforts. The district is strongly encouraged to review and utilize the templates and resources listed on the page 16 to further enhance the EEO plan and strategies.

Visiting Executive of		Date:	
Educationa <b>l</b>	120		
Excellence and	W Six		F-b-21 2024
Equal Employment			Feb 21, 2024
Opportunity Program	Abdulmalik Buul (Feb 21, 2024 20:05 PST)		
Signature:			

## Comments:

The CCCCO highly appreciates your institution's willingness, consistency, and commitment toward this work. You are highly encouraged to adopt the feedback in this form.