

**THE ASSOCIATION OF CHIEF
HUMAN RESOURCE OFFICERS
(ACHRO)**

2026 ANNUAL CONFERENCE

**From Plan to Practice: Operationalizing
Your EEO Plan**

10/01/2026

PRESENTED BY:

Cabrillo CCD:

Angela Hoyt, J.D., Vice Chancellor, Human Resources

Amy Mahoney, Human Resources Analyst

Liebert Cassidy Whitmore:

Amy Conway (Brandt), Partner, San Francisco Office

Tevon Edwards, Associate, San Francisco Office

LCW

LIEBERT CASSIDY WHITMORE

Cabrillo College

From Plan to Practice: Operationalizing Your EEO Plan

Association of Chief Human Resource Officers (ACHRO) Conference | October 1, 2026

Presented By:

Cabrillo CCD: Angela Hoyt, J.D. & Amy Mahoney
Liebert Cassidy Whitmore: Amy Conway (Brandt) & Tevon Edwards

1

Agenda

• The Legal Framework

• Why Implementation Matters

• Cabrillo’s EEO Plan

• Training

• Cluster Hiring

• Practical Advice!

LCW

Cabrillo College

2

Peak & Pit

• As we move through the presentation, consider your experience implementing your district’s EEO Plan

• Peak:

▪ One implementation success

▪ A practice that gained traction

▪ Something that produced a meaningful result

• Pit:

▪ One persistent challenge

▪ A strategy that stalled

▪ Something that did not work as intended

• Keep adding to your card. We will use it during the closing discussion

LCW

Cabrillo College

3

The Legal Framework

LCW

Cabrillo College

4

EEO in California Community Colleges

“Each district employer shall commit to sustained action to devise recruiting, training and advancement opportunities that will result in equal employment opportunities for all qualified applicants and employees”

*EC 87101(c).

LCW

Cabrillo College

5

EEO Plan Defined

- **“EEO Plan”**: A written document that describes a district’s EEO program, and includes:
 - o Analysis of the district’s work force
 - o Descriptions of the district’s program and strategies informed by the district’s work force analysis
- **“EEO program”**: The combination of district strategies implemented to promote EEO. Such programs should be informed by a district’s longitudinal workforce and applicant analyses

*53001(d) & (e)

LCW

Cabrillo College

6

State Chancellor:
EEO Plan General Requirements

- Developed in collaboration with district's EEOAC
- Reviewed & adopted at a regular meeting of the governing board
 - Agendized as a separate action item, not on consent agenda!
- Covers a 3-year period
- Submitted to the Chancellor at least 90 days prior to adoption
- Any comments received from Chancellor's Office must be presented to the governing board prior to adoption

*53003(a)

LCW

Cabrillo College

7

Sensitivity to Diversity

- Districts must give "meaningful consideration"
 - Whether applicants for faculty and administrative positions
 - Show "sensitivity to and understanding of the diverse academic, socioeconomic, cultural, disability and ethnic backgrounds of community college students"

Ed Code, § 87360

LCW

Cabrillo College

8

EEO In California

Proposition 209

- Prohibits "preferential treatment" on the basis of:
 - Race
 - Sex
 - Color
 - Ethnicity
 - National Origin
- In Public:
 - Employment
 - Education
 - Contracting

*Cal. Const. Art. 1, Sec. 31

LCW

Cabrillo College

9

Prop 209 & The Courts

- Targeted recruitment = unlawful preference

**Hi-Voltage v. City of San Jose*
Connerly v. State Personnel Board

LCW

Cabrillo College

10

True/False/Maybe

- The DEIA regulations are dead in the water. Why are we talking about this?

FALSE

LCW

Cabrillo College

11

Why Implementation Matters

LCW

Cabrillo College

12

Making the EEO Plan Real

- The test is not whether the EEO Plan was adopted
- The test is whether it changes what people do when they recruit, screen, hire, onboard, support, and retain employees
- ASK:
 - Who owns the next step?
 - What evidence will we collect?
 - What will we adjust?

LCW

Cabrillo College

13

A Successful EEO Plan...

- Changes what people actually *do* when they:
 - Recruit candidates
 - Review applicant pools
 - Screen applications
 - Conduct interviews
 - Make hiring decisions
 - Onboard and support employees
 - Evaluate results and adjust practices

LCW

Cabrillo College

14

A Practical Operating Model

- For every EEO Plan strategy, answer five questions:
 - What specifically will change?
 - Who is responsible?
 - When and how often will the work occur?
 - What evidence will show whether it is working?
 - Who will review the evidence and make adjustments?

LCW

Cabrillo College

15

Cabrillo's EEO Plan Operating Model

LCW

Cabrillo College

16

Cabrillo's Component 13

- Eight specific EEO strategies
- Responsible individuals and groups
- Year-by-year implementation milestones
- Effectiveness measures
- A process for reviewing and adjusting each strategy

LCW

Cabrillo College

17

Cabrillo's Eight Strategies

- Pre-hiring:
 - Cultivate a diverse and sustainable pool of trained screening committee members
 - Implement the NEOED "Diversity Health" feature to provide timely applicant-pool information

LCW

Cabrillo College

18

Cabrillo's Eight Strategies

- Hiring:
 - Develop and expand a formal EEO Representative Program
 - Pilot the redaction of personally identifiable information during application screening

LCW

Cabrillo College

19

Cabrillo's Eight Strategies

- Post-hiring:
 - Implement First Year Surveys at 3, 6 and 12 months
 - Develop a centralized Employee Resource Group website
 - Implement DEIA-focused exit interviews
 - Improve the disability-accommodation process and supporting resources

LCW

Cabrillo College

20

Example – Piloting Before Institutionalizing

PII-Blinding pilot

- Year One:
 - Configure the information to be redacted
 - Select one faculty and one administrator recruitment
 - Develop evaluation measures
- Year Two:
 - Conduct additional pilots
 - Refine the process based on operational experience
 - Review available hiring data

LCW

Cabrillo College

21

Example – Piloting Before Institutionalizing

- Year Three:
 - Evaluate sustainability and effectiveness
 - Determine whether the practice should become a standard procedure

LCW

Cabrillo College

22

Example – Effective Training Model

- Foundational training:
 - EEO and nondiscrimination requirements
 - The educational value of workforce diversity
 - Bias and fair decision-making
 - Cabrillo's EEO Plan commitments

LCW

Cabrillo College

23

Example – Effective Training Model

- Role-specific training:
 - Committee chair responsibilities
 - EEO Representative responsibilities
 - HR's role
 - Documentation and escalation procedures
 - (BONUS: Train the Trainer!)

LCW

Cabrillo College

24

Example – Effective Training Model

- Just-in-time training:
 - Position-specific outreach
 - Supplemental questions and rubrics
 - Screening and interview procedures
 - Predictable decision points during the recruitment process

LCW

Cabrillo College

25

Cluster Hiring

LCW

Cabrillo College

26

Cabrillo’s Cluster Hiring Model

- An intentional effort to recruit, hire, onboard and retain a cohort of tenure-track faculty who:
 - Are highly qualified for their individual positions
 - Are committed to student success
 - Can effectively serve Cabrillo’s diverse student population
 - Support the College’s institutional and equity goals
- Cluster hiring is based on job-related qualifications and institutional mission—not protected-category preferences

LCW

Cabrillo College

27

2026-27: Cabrillo's Fourth Round

- Cabrillo will enter its fourth round of cluster hiring in 2026-27
- The next round provides an opportunity to:
 - Preserve the practices that worked
 - Refine training and assessment tools
 - Improve stakeholder communication
 - Strengthen cohort support
 - Identify measures beyond initial hiring results
 - Apply lessons learned from earlier rounds

LCW

Cabrillo College

28

What Changed in the Hiring Process?

Cabrillo retained

- Minimum qualifications
- Position-specific professional requirements
- The core recruitment process
- Interviews and final hiring decisions
- EEO participation in the selection process

Cabrillo enhanced

- Advertising and outreach
- DEIA-focused supplemental questions
- A specialized scoring rubric
- Screening committee training
- Student participation where feasible
- Onboarding and cohort support

LCW

Cabrillo College

29

Supplemental Questions

- Applicants were asked to address areas such as:
 - Experience engaging effectively with people from diverse and historically underserved backgrounds
 - Knowledge of barriers affecting racially minoritized and economically underserved students
 - Experience addressing disproportionate student outcomes
 - Pedagogical strategies that provide equitable learning opportunities
 - The development of the applicant's own cultural competence

LCW

Cabrillo College

30

Promising Results

- The reported inaugural cluster-hiring results included:
 - 12 faculty hires
 - 8 faculty of color
 - 1 faculty member identifying as nonbinary
 - Increased diversity in 7 of the 9 disciplines advertised

LCW

Cabrillo College

31

Cohort Support Is Part of the Model

- Cabrillo's post-hire support included:
 - A built-in peer cohort
 - Mentoring relationships
 - Leadership welcome events
 - Flex Week programming
 - Community-building activities
 - Continued equity-related professional development
 - Opportunities for interdisciplinary connection

LCW

Cabrillo College

32

Practical Implementation & Discussion

LCW

Cabrillo College

33

Let's Discuss Your Peaks & Pits

- Take one minute to review your card
- Consider:
 - Which experience would be most useful to share?
 - What did you learn?
 - What question would you like to ask the group?
 - We will begin with peaks and then turn to pits

LCW

Cabrillo College

34

What Is Working in Your District?

- Share a "Peak"
 - What changed?
 - Who owns the practice?
 - Why did it gain traction?
 - What resources or relationships made it possible?
 - How do you know it is happening?
 - What evidence suggests that it is helping?

LCW

Cabrillo College

35

Where Does Implementation Stall?

- Share a "Pit"
- Common barriers include:
 - Limited HR capacity
 - Screening committee fatigue
 - Competing institutional priorities
 - Unclear ownership
 - Lack of leadership sponsorship
 - Uncertainty about legal boundaries
 - Difficulty obtaining timely data
 - Measures that do not support decisions
 - Resistance to changing established practices
 - Insufficient resources for post-hire support

LCW

Cabrillo College

36

Timeline for EEO Plans

- Plan your plan!
- Backward plan to factor in:
 - Necessary EEOAC meetings
 - Submission to Chancellor's Office
 - Board consideration of comments from the Chancellor's Office
 - Time to revise between comments, Board consideration of comments, and adoption of final EEO Plan

LCW

Cabrillo College

37

Permissible Use of Funding Streams

- EEO funds may be used to support the implementation of best practices for success in promoting equal employment opportunity and faculty and staff diversity, including for:
 - (1) outreach and recruitment;
 - (2) in-service training on equal employment opportunity;
 - (3) accommodations for applicants and employees with disabilities pursuant to section 53025; and
 - (4) other activities to promote equal employment opportunity.

o Note: Same guidelines for "EEO Best Practices" One-Time Money

LCW

Cabrillo College

38

EEO Plan Development: Practice Tips

- Foster EEO Advisory Committee Continuity
 - At district level
 - Between colleges and district in multi-college systems
- Audit what you are already doing through a "multiple methods" lens
 - Are EEO Plan activities effective?
 - Are you engaged in activities that support EEO that aren't memorialized in the EEO Plan?
- Indicate the year(s) in which certain activities will occur
 - Including when longitudinal data analysis will begin
 - Be realistic

LCW

Cabrillo College

39

Thank You!

Angela Hoyt, J.D.

Cabrillo CCD

Vice President, Human Resources & Labor Relations

831.479.6234 | anhoyt@cabrillo.edu

Amy Mahoney

Cabrillo CCD

HR Analyst

831.477.5618 | ammahone@cabrillo.edu

Amy Conway (Brandt)

Liebert Cassidy Whitmore

Partner | San Francisco

415.512.3045 | abrandt@lcwlegal.com

Tevon Edwards

Liebert Cassidy Whitmore

Associate | San Francisco

415.512.3038 | tedwards@lcwlegal.com

LCW

Cabrillo College

40

14