

# 2020

Affirmative Action Program for Women & Minorities At Northwestern State University

## EQUAL EMPLOYMENT OPPORTUNITY/ AFFIRMATIVE ACTION PLAN

#### FOR

#### NORTHWESTERN STATE UNIVERSITY

Natchitoches, Louisiana 71497

DATA YEAR: October 1, 2018 to September 30, 2019 AAP YEAR: October 1, 2019 to September 30, 2020

PLAN COMPLETED BY:

Veronica M. Biscoe, Executive Director Institutional Effectiveness & Human Resources (318) 357-6359

**APPOINTING AUTHORITY:** 

Dr. Chris Maggio, President

I have read this affirmative action plan and will ensure that all necessary and appropriate steps are taken to make certain this University provides equal employment opportunities to all employees and applicants.

Facility EEO-6 Identification Number: 002021

#### STATEMENT OF EQUAL EMPLOYMENT OPPORTUNITY AND AFFIRMATIVE ACTION POLICY

It is, has been, and will continue to be the policy of Northwestern State University to provide equal employment opportunity without regard to race, color, gender, religion, sexual orientation, national origin, disability, genetic information, age, pregnancy or parenting status, veteran status, or retirement status. Further, it is the policy of this University to undertake affirmative action in compliance with all federal, state, and local requirements. I wish to take this opportunity to issue a formal reaffirmation of this policy and to assure faculty, staff, students, and applicants for employment of my personal commitment to our equal opportunity and affirmative action objectives.

Our continued success depends heavily on the full and effective utilization of qualified persons. I will continue to direct our employment practices toward ensuring equal opportunity for all. The University intends that all matters related to recruiting, hiring, training, compensation, benefits, promotions, transfers, terminations, as well as all University-sponsored social and recreational programs and all treatment on the job be free of unlawful discriminatory practices.

As a government contractor, we are obligated to keep records, make reports to the federal government, develop written Affirmative Action Programs, and otherwise document the results of our good faith efforts to ensure equality of employment opportunity at Northwestern State University.

While, as President, I retain the overall responsibility for University's Equal Employment Opportunity and Affirmation Action Programs, the administration and implementation of these important programs for women, minorities, individuals with a disability, and veterans of the wars, including the Vietnam Era, are the responsibility of Ms. Biscoe, Executive Director of Institutional Effectiveness & Human Resources and EEO Officer. I ask each vice-president, dean, director, department head and supervisor join me in full support of the principles of equal opportunity and affirmative action. I invite any applicant or employee to address your concerns and questions to Ms. Biscoe.

Dr. Chris Maggio, President

Date

#### LIST OF DEPARTMENTS & JOB GROUP CODES

All personnel areas and job group codes as listed are included in this plan.

#### Departments:

Academic Advising Services Academic Affairs Accessibility & Disability Support Admissions **Auxiliary Services Business Affairs** CENLA Child & Family Network **Child & Family Studies** Child Development Center College of Arts & Letters College of Business & Technology College of Education & Human Development College of Nursing & Allied Health **Creative & Performing Arts** Criminal Justice/History/Social Sciences **Electronic & Continuing Education Engineering Technology** English, Foreign Languages & Cultural Studies **External Affairs** Graduate School Grounds Health & Human Performance Health Services Hospitality Management & Tourism (HMT) Information Technology Service Informational Services Institutional Effectiveness & Human Resources Institutional Research Intercollegiate Athletics International Recruiting Louisiana Folklife Center Louisiana Scholars' College Maintenance of Buildings Marketing & Branding **Mathematics Military Science** New Media, Journalism & Communication Arts NSU Center – Leesville/Ft. Polk **Office of Sponsored Programs Operations of Utilities Physical Plant Plant Services** Post Office President's Office Psychology **Recreation Complex** School of Biological & Physical Sciences School of Business Social Work **Student Affairs** Student Experience **Student Financial Aid** Student Services **Student Support Services** Teaching, Leadership & Counseling Technology, Innovation & Economic Development Telecommunications **Testing Center** TIP/Advance University Advancement **University Affairs** University Police **University Printing Services** University Recruiting University Registrar Watson Library Wellness, Recreation & Activity Center (WRAC)

#### Job Groups:

O1A Executive O1B Administrative O1C Managerial O2A Professor O2B Associate Professor O2C Assistant Professor O2D Instructor O3A Prof-Non-Fac-Academic O3B Prof-Non-Fac-Inst O4A Secretarial O4B Clerical O5A Technical O5B Paraprofessional O60 Skilled Crafts O7A Service O7B Maintenance

#### **Confidentiality Notice to the OFCCP**

This Affirmative Action Program contains substantial confidential information which is subject to the provisions of 18 USC Section 1905. *Chrysler Corp. v. Brown, 441 U.S. 281 (1979).* 

This Affirmative Action Program is the property of Northwestern State University and it is loaned to the Office of Federal Contract Compliance Programs, along with certain other materials requested by the OFCCP, on the condition that the government hold them totally confidential and not release copies to any person.

Pursuant to 5 U.S.C. Sec. 552 Northwestern State University asserts that <u>at least</u> certain sections, exhibits, and compliance investigation files are exempt from the FOIA disclosure provisions. Disclosure of AAP Sections IV and X and Exhibits <u>2</u>, <u>3</u>, <u>7</u> and <u>8</u>, and the compliance investigation files would injure the business and financial position of the contractor and would constitute an unwarranted invasion of the privacy of its employees. Disclosure of the above information would also reveal valuable trade secrets and confidential commercial and financial information.

Notice is hereby given of a request pursuant to the regulations of the OFCCP that this AAP be kept confidential.

Northwestern State University does not consent to the release of <u>any</u> information whatsoever contained in this Affirmative Action Program under the Freedom of Information Act. If the OFCCP or any other Federal agency is considering a request to release any portion of this AAP under the Freedom of Information Act, Northwestern State University asks that the government immediately notify Dr. Chris Maggio, President, of any and all Freedom of Information Act requests received by the government or any other contemplated release of this AAP or any other information obtained by the government from Northwestern State University.

NOTE: The term "Affirmative Action Program" or "AAP" includes its supporting appendixes, exhibits, documents, data, and all materials provided by Northwestern State University to the OFCCP or other governmental agency.

### TABLE OF CONTENTS

EEO Policy	pg.1
Dissemination of Policy	pg. 3
Designation of Responsibility	pg. 5
Workforce Analysis	Exhibit 1*
Job Group Analysis	Exhibit 2*
Placement of Incumbents in Job Groups & Comparing Incumbents to Availability	Exhibit 3*
Availability	Exhibit 4*
Factor 1 Components	Exhibit 5*
Summary of Personnel Activity	Exhibit 6*
History of Comparisons and Action Steps	Exhibit 7

\*Available in EEO Office, #111 Caspari Hall

#### Northwestern State University Commitment to Equal Employment Opportunity

It has been, and will continue to be, the policy of Northwestern State University to be an equal opportunity employer. All employment decisions are based on job related standards and must comply with the principles of equal employment opportunity.

In keeping with this policy, the University will continue to recruit, hire, train, and promote into all job levels the most qualified persons without regard to race, color, gender, religion, sexual orientation, national origin, disability, genetic information, age, pregnancy or parenting status, veteran status or retirement status. All personnel actions, such as compensation, benefits, transfers, layoffs, training, and education are administered without regard to race, color, gender, religion, sexual orientation, national origin, disability, genetic information, age, veteran status, or retirement status.

The University is committed to equal opportunity for student success by providing access to educational programs, tuition assistance, and social and recreational activities for all students without regard to race, color, gender, religion, sexual orientation, national origin, disability, genetic information, pregnancy or parenting status, age, veteran status or retirement status.

Additionally, the University provides equal access to the Boy Scouts of America and other designated youth groups.

Student complaints or inquiries related to Title IX should be directed to the Title IX Coordinator for Students/Director of Student Advocacy, Kimberly Johnson Liner (318-357-5570), located in room #308 of the Friedman Student Union. Employee Title IX issues should be directed to the EEO Officer, Veronica M. Biscoe (318-357-6359), located in Caspari Hall, room #111.

In accordance with Section 35.106 of the Americans with Disabilities Act (ADA), all participants, applicants, organizations, and interested individuals are advised and notified that the Interim ADA Coordinator for Northwestern State University is Veronica M. Biscoe. Contact information is provided in previous paragraph. For academic services, contact the Director of Accessibility and Disability Support, Randi Washington (318-357-4460), located in room #234 of the Friedman Student Union.

Dr. Chris Maggio, President

#### **Commitment to Equal Employment Opportunity**

Overall responsibility for implementing and monitoring the Affirmative Action Program rests with the President; however, each employee plays a vital part in maintaining bias-free University work and academic environments. Administrators and supervisors who make employment decisions are responsible for the progress in meeting affirmative action goals within their work area.

The Executive Director of Institutional Effectiveness & Human Resources and EEO Officer is assigned the overall responsibility of affirmative action and equal employment opportunity. This includes developing and maintaining the necessary programs, records, and reports to comply with all government regulations, and with implementing the goals and objectives of the affirmative action program. Many of these activities are conducted with the assistance of Human Resources.

#### **DISSEMINATION OF POLICY**

#### 41 CFR 60-2.13(b)

#### A. Internal Dissemination

The University will continue to make its equal employment opportunity policy known internally by:

- 1. Posting a policy statement.
- 2. Including the policy in the University Policy and Procedure Manual, Staff Handbook and Faculty Handbook. All documents are located on-line and may be accessed electronically.
- 3. Explaining the policy thoroughly in new employee orientation.
- 4. Conducting periodic meetings with University administrators and supervisory personnel to explain the intent of the policy, the President's commitment, and individual responsibilities for effective implementation.
- 5. Publicizing the policy in the University Catalog (available electronically) and other media.
- 6. Picturing both minority and non-minority men and women in publications (both electronic and hard copy) in which students and employees are featured.
- 7. Making current employees aware of the existence of the Affirmative Action Program and the benefits available to them.
- 8. Each semester, "advertising" the Notice of Non-Discrimination in the student/school newspaper.

#### B. External Dissemination

The University will make its policy known externally by:

- 1. Incorporating the equal employment opportunity clause in all purchase orders, instruction to bidders, leases, and contracts covered by Executive Order 11246, as amended.
- 2. Notifying in writing in all recruiting activities of the University policy, that we actively recruit women and minorities for all positions for which they qualify. Also included is the abbreviated version of the Notice of Non-Discrimination. There is a link directing the reader to the full disclosure on the University's Web site.
- 3. Showing both minority and non-minority men and women when students and employees are pictured in University publications (both electronic and hard copy).
- 4. Informing prospective employees of the existence of the University's Affirmative Action Program.
- 5. Sending written notification of the University policy to all vendors, and suppliers.
- 6. Making available the Notice of Non-Discrimination, both the full and abbreviated versions, on the University's Web site.
- 7. Each semester, "advertising" the Notice of Non-Discrimination in the Daily Messenger.
- 8. Include the Notice of Non-Discrimination on all job advertisements.

#### DESIGNATION OF RESPONSIBILITY FOR IMPLEMENTATION

Dr. Chris Maggio has the overall responsibility for the implementation of the University's equal opportunity policy. He has assigned coordination responsibilities and day-to-day management of this important function to Ms. Veronica Biscoe, Executive Director of Institutional Effectiveness & Human Resources and Equal Employment Officer who has the full support of executive management.

A. Duties of the Executive Director Institutional Effectiveness & Human Resources/EEO Officer

The duties of the Director of Affirmative Action/EEO Officer include:

- 1. With the assistance of Human Resources, developing policy statements, affirmative action programs, and internal and external communication techniques.
- 2. Identifying problem areas.
- 3. Assisting vice-presidents, deans, directors, department heads and supervisors in arriving at solutions to problems.
- 4. Designing and implementing auditing and reporting systems that:
  - a. Measure the effectiveness of the EEO programs.
  - b. Indicate any need for remedial action; and
  - c. Determine the degree to which the University's goals and objectives are being carried out.
- 5. Serving as liaison between the University and enforcement agencies.
- 6. Serving as liaison between the University and compliance agencies.
- 7. Keeping all levels of University administration informed of the latest developments in the equal opportunity area.
- 8. Meeting with all levels of University administration to make certain that the University's EEO policies are being followed.

#### B. Duties of Vice-Presidents

The duties of all Vice-Presidents include:

- 1. Assisting the EEO Officer in the identification of problem areas and in the establishment of applicable organizational unit goals and objectives.
- 2. Assisting in the establishment of only job-related criteria for selection for hire, promotion, transfer, training, and all other employment opportunities.
- 3. Reviewing the qualifications of all employees to ensure that minorities and women are given full opportunities for transfers and promotions.
- 4. Performing periodic audits to ensure that:
  - a. EEO posters and University policy statements are properly displayed; and
  - b. All facilities which the University maintains for the use and benefit of its employees and students are, in fact, desegregated, both in policy and in use, and that facilities such as dormitories, locker rooms, and restrooms are comparable for both genders.
  - c. Minority and female employees are encouraged to participate in all Universitysponsored educational, training, recreational, and social activities.
- 5. Preventing harassment of employees on account of race, color, gender, religion, sexual orientation, national origin, disability, genetic information, age, veteran, or retirement status.
- 6. Understanding that their work performance is being evaluated based on their equal opportunity efforts and results, as well as other criteria.
- C. Duties of Deans, Directors, Department Heads, Head Coaches and Supervisors

The duties of deans, directors, department heads, head coaches and supervisors include:

- 1. Provide leadership in establishing units' goals and objectives.
- Make good faith efforts to meet realistic numerical goals and timetables from data provided by the Executive Director, Institutional Effectiveness and Human Resources EEO Officer in identifying problem areas and developing annual updates of the Plan as it applies to their individual units.

- 3. Periodic audits of their units' personnel transactions, such as, hiring, promotions, reclassification, upgrades, or terminations to ensure the attainment of established goals and objectives.
- 4. Periodic discussions with unit employees to be certain that the University's employment policies are being followed.
- 5. Periodic review of qualifications of employees to ensure that minorities and women are given full consideration for promotions, upgrades, and reclassification.
- 6. Periodic inspections to ensure that each work location complies as follows:
  - a. AA/EEO posters are properly displayed.
  - b. University sponsored activities and functions are desegregated.
  - c. Minority and female employees are afforded full opportunity and are encouraged to participate in University-sponsored educational training, recreational and social activities; and
  - d. Facilities accommodate individuals with disabilities.

#### AREAS OF COMPLIANCE AND IMPROVEMENT

The following job groups were found to be in compliance for female and minority groups for the 2018-2019 plan year.

01A Executive 01B Administrative 02A Professor 02C Assistant Professor 02D Instructor 03A Prof-Non-Fac Academic 04A Secretarial 04B Clerical 05A Technical 05B Paraprofessional 060 Skilled Craft 07A Service 07B Maintenance

The University's goal for every job group, whether underutilized or not, and its' objective for every organizational unit is continued support of affirmative action to ensure its' employment policies and practices are, in fact, non-discriminatory. The University actively recruits both men and women for all jobs. Referral sources are informed Northwestern seeks and encourages only qualified applicants, without regard to race, color, gender, religion, sexual orientation, national origin, disability, genetic information, age, pregnancy or parenting status, veteran status, or retirement status.

Northwestern believes that just as discrimination, by definition, excludes persons because of their race, color, gender, religion, sexual orientation, national origin, disability, genetic information, age, pregnancy or parenting status, veteran status, or retirement status, affirmative action seeks to include as many qualified persons as possible – also without regard to race, color, gender, religion, sexual orientation, national origin, disability, genetic information, age, pregnancy or parenting status, veteran status, or retirement status. The objective of affirmative action is to provide equal access to equal opportunities. Consequently, the University has considered how it might recruit women and minorities who possess requisite skills, but who are not currently in the workforce.

The following actions have been and will continue to be taken to maintain compliance:

- NSU has a strong affirmative action policy and commitment to the integration of that policy in all its activities.
- Periodic meetings are held with University administrators and supervisory personnel to explain the intent of the policy, the President's commitment, and individual responsibilities for effective implementation.

- Policy is publicized and all publicity is appropriately planned to represent diverse populations associated with the University.
- NSU actively recruits women and minorities for all positions for which they qualify through all recruiting activities.
- Improve implementation of an auditing and reporting system that measures the effectiveness of the EEO program indicates need for remedial action, and assists, in restorative action.
- Increase number of meetings with University administration to inform them of the latest developments in the EEO area and to make certain that the EEO policies are being followed.
- Maintaining a zero-tolerance philosophy for harassment and discrimination.
- Full review of all employees to ensure that minorities and women have full opportunity for transfer and promotion.
- Review of all selection and promotion procedures.

Dr. Chris Maggio, President

#### AREAS OF UNDERUTILIZATION

The following job groups have been identified as underutilized (includes disability and/or veteran's status) for the 2018-2019 plan year:

- 01C Managerial (female)
- 02B Associate Professor (female)
- 02C Assistant Professor (disability status)
- 03B Prof-Non-Fac Institutional (female & veteran's status)

Job group 01C is new to the list in underutilization of females. This will be reviewed, as this category has not been on the list for some time.

Based on the last reporting cycle, job group 02B (Associate Professor) remains on the list for underutilization females. We will continue to share this information with those responsible for making faculty hiring decisions to include academic department heads, academic deans, and the Provost.

Job group 02C (Assistant Professor) remains on the list for Underutilized Areas. Assistant Professors are underutilized in the disability status category. This information also will be shared with the Provost, academic deans, and academic department heads.

Job group 03B (Professional, Non-Faculty Institutional) was underutilized in both the female and veteran's classifications. Vast departments utilize the skill sets of those in job group 03B; therefore, these supervisors and their vice-president will be apprised to address this area of underutilization.

I continue to note the inability to completely and correctly identify one's gender, race, disability status, and veteran status, as it remains optional during the search process. When asking current and/or potential employees to respond to the sought-after demographic, they can select the response, "I wish/prefer not to respond." This option continues to misrepresent the demographics of the University's current and/or potential employees. Additionally, reporting is not required for other areas of diversity, such as religion, ethnic status, and sexual orientation. If individuals had an opportunity, and chose to respond, to these statuses, Northwestern could demonstrate more fully its diverse employees. Despite that possibility, Northwestern continues to do all possible to provide equal employment opportunities to all.

As in years past, the State of Louisiana remains in state of concern regarding its financial health, especially due to the impact of COVID-19. This worldwide pandemic has and will continue to impact Higher Education. It is common practice for the University to advertise and hire when employees resign or retire, and when the number of current faculty is not adequate to meet the mission of the institution as per the Southern Association of College and Schools Commission on Colleges Principles of Accreditation.

For over a decade, higher education, especially in Louisiana, continues to suffer because of funding issues. The financial struggle is significant. During the search process for new employees, many candidates question the financial viability of the institution; therefore, it can be theorized this impacts the number of people, especially females and minorities, who apply for positions at Northwestern. State salaries for faculty continue to be below SREB averages, and staff salaries remain below the national average.

The University of Louisiana System (ULS) Task Force for Inclusion and Diversity in the Workforce has worked diligently to impact the workforce regarding diversity, equity, and inclusion. Many initiatives are a result of the Taskforce, but most importantly are the hiring of a Vice President for Diversity and Inclusion and the development of Strategic Plan for Diversity and Inclusion. The new vice president will begin his duties in August 2020 and the plan will be out of draft form by that time too.

For all areas identified as underutilized, Northwestern State University is committed to taking appropriate and realistic action to improve utilization. The steps for this action remain the same as those taken in all areas.

The University's goal for every job group, whether underutilized or not, and its' objective for every organizational unit is continued support of affirmative action to ensure its' employment policies and practices are, in fact, non-discriminatory. The University actively recruits both men and women for all jobs. Referral sources are informed Northwestern seeks and encourages only qualified applicants, without regard to race, color, gender, religion, sexual orientation, national origin, disability, genetic information, age, pregnancy or parenting status, veteran status, or retirement status.

Northwestern believes that just as discrimination, by definition, excludes persons because of their race, color, religion, gender, or national origin, affirmative action seeks to include as many qualified persons as possible – also without regard to race, color, gender, religion, sexual orientation, national origin, disability, genetic information, age, pregnancy or parenting status, veteran status, or retirement status. The objective of affirmative action is to provide equal access to equal opportunities. Consequently, the University has considered how it might recruit women and minorities who possess requisite skills, but who are not currently in the workforce.

The following actions have been and will continue to be taken to maintain compliance:

- NSU has a strong affirmative action policy and commitment to the integration of that policy in all its activities.
- Periodic meetings are held with University administrators and supervisory personnel to explain the intent of the policy, the President's commitment, and individual responsibilities for effective implementation.
- Policy is publicized and all publicity is appropriately planned to represent diverse populations associated with the University.

- Current employees are educated to the affirmative action program in workshops and announcements.
- NSU actively recruits women and minorities for all positions for which they qualify through all recruiting activities.
- Improve implementation of an auditing and reporting system that measures the effectiveness of the EEO program indicates need for remedial action and assists in restorative action.
- Increase number of meetings with University administration to inform them of the latest developments in the EEO area and to make certain that the EEO policies are being followed.
- Maintaining a zero-tolerance philosophy for harassment.
- Full review of all employees to ensure that minorities and women have full opportunity for transfer and promotion.
- Review of all selection and promotion procedures.

## In addition, the following steps have been identified to ensure that every reasonable action is taken to attain compliance:

- Meetings will be held with those individuals in supervisory positions who are most closely associated with the recruiting efforts in the areas identified to brainstorm individualized actions to meet compliance.
- Affirmative recruitment will be conducted by utilizing the following organizations to identify qualified candidates for faculty positions:
  - National Minority Faculty Identification Program Directory The Directory of Minority Ph.D. and M.F.A. Candidates and Recipients \*Investigate other options to reach ALL
- Advertising in newspapers that reach target populations of females and minorities.
- Recruit, where appropriate, through other University Systems using electronic delivery (primarily those Universities high in minority populations).

## HISTORY OF COMPARISONS

## NORTHWESTERN STATE UNIVERSITY

Job Group	Female				Minority			
	2017-2018		2018-2019		2017-2018		2018-2019	
	Inc #	Avail %						
Executive	3	22.19	2	22.19	1	13.60	2	13.60
Administrative	6	60.12	7	60.12	2	26.18	1	26.18
Managerial	9	60.52	16	78.58	2	29.34	4	23.86
Professor	29	67.88	25	67.03	2	25.52	3	25.26
Associate Professor	23	66.90	20	66.90	6	25.18	5	25.18
Assistant Professor	97	66.70	107	67.16	27	25.19	32	25.44
Instructor	36	66.99	39	67.18	6	25.29	7	25.52
Prof-Non-Fac Academic	22	73.02	18	73.02	5	36.24	6	36.24
Prof-Non-Fac-Inst.	84	69.88	74	74.17	30	27.06	27	28.37
Secretarial	45	81.00	43	81.00	9	30.03	10	30.03
Clerical	117	78.35	119	78.35	41	30.83	41	30.83
Technical	13	34.67	13	37.32	4	22.14	5	21.96
Paraprofessional	10	87.14	9	87.14	2	40.96	2	40.96
Skilled Craft	3	3.39	3	3.39	2	38.24	2	38.24
Service	8	19.39	11	19.37	11	42.50	14	42.12
Maintenance	0	4.62	0	4.15	7	29.41	8	28.54

\*Job Groups identified in analysis as underutilized during the 2018-2019 plan.

## NORTHWESTERN STATE UNIVERSITY

Job Group	Disability				Veteran			
	2017-2018		2018-2019		2017-2018		2018-2019	
	Inc #	Avail %	Inc #	Avail %	Inc #	Avail %	Inc #	Avail %
Executive	0	7.00	0	7.00	0	7.20	0	7.20
Administrative	0	7.00	0	7.00	0	7.20	0	7.20
Managerial	1	7.00	1	7.00	2	7.20	1	7.20
Professor	0	7.00	0	7.00	3	7.20	3	7.20
Associate Professor	1	7.00	1	7.00	4	7.20	4	7.20
Assistant Professor	1	7.00	0	7.00	3	7.20	2	7.20
Instructor	0	7.00	0	7.00	1	7.20	1	7.20
Prof-Non-Fac Academic	1	7.00	1	7.00	0	7.20	0	7.20
Prof-Non-Fac-Inst.	3	7.00	1	7.00	0	7.20	0	7.20
Secretarial	0	7.00	0	7.00	1	7.20	1	7.20
Clerical	4	7.00	2	7.00	2	7.20	1	7.20
Technical	1	7.00	1	7.00	0	7.20	0	7.20
Paraprofessional	1	7.00	1	7.00	2	7.20	1	7.20
Skilled Craft	0	7.00	0	7.00	0	7.20	0	7.20
Service	1	7.00	0	7.00	5	7.20	5	7.20
Maintenance	1	7.00	0	7.00	1	7.20	1	7.20

\*Job Groups identified in analysis as underutilized during the 2018-2019 plan.