



## Employer Recruiting Activities at PCC

PCC faculty and staff may be contacted by employers asking for access to students in class, recommendations for individual candidates, postings or announcements of openings, letters of reference or recommendation, etc.

**All faculty and staff are expected to adhere to college policies and employment law as it relates to fair access, fair employment practices, and privacy.** This is true for ALL recruitment activities, whether formal (e.g., a job fair or posting a job announcement) or informal contacts with recruiters.

- **Equal Opportunity Requirements**

Organizations recruiting through PCC must certify that they are equal opportunity employers, offering employment without regard to race, color, religion, national origin, sex, marital status, disability, veteran status, age, sexual orientation or any other status protected by federal, state or local law.

- **Fair Wage and Hour Requirements**

All jobs posted at PCC must be bona fide employment opportunities **paying at least minimum wage**. Other business ventures, including opportunities which require an initial investment are excluded from posting. Unpaid internships must adhere to federal and state standards.

- **Confidentiality of Student Information**

The Family Educational Rights and Privacy Act (FERPA) prohibits disclosure of personal information to parties outside your organization without written consent from each candidate.

Additionally, all PCC activities, such as in-class presentations by employers, job fairs, referrals to jobs/internships, etc., must follow PCC's policies regarding **Non-discrimination, Non-harassment and Privacy**.

The easiest way to ensure compliance is to coordinate recruitments through the **Jobs & Internships office** at each campus. However, faculty and staff can work with recruiters directly as long as policy and legal requirements are met. Below are some recommendations to ensure compliance.

### **Recommended Practices:**

- **Provide fair access to job and internship opportunities.** 1) Clarify and document employer's screening requirements, with an emphasis on "hard" skills and qualifications; 2) Consider "open" recruitment activities such as job fairs, employer presentations, posting job openings, etc., instead of individual referrals; 3) Forward a pool of applicants from which the employer chooses a hire; 4) When an individual candidate is recommended or "referred," document strengths and qualifications of candidate; 5) Publish/post program requirements for internship participation such as GPA or pre-requisites.

### Recommended Practices (Cont.):

- **Comply with FERPA.** 1) Have students complete and sign a consent form - available on-line through MyPCC - whenever acting as a reference or providing a recommendation; 2) Consider having candidates forward application materials such as resume, transcripts, etc., directly to the employer.
- **Clarify wages, work conditions and schedule.** 1) Request a detailed job description from the employer; 2) Confirm interest of candidate before making recommendations; 3) Document minimum wage requirements and other mandatory labor standards compliance.
- **Protect student privacy in the classroom.** 1) Restrict employers' access to students in class – employers can speak in the classroom as “content experts” but NOT as recruiters; 2) Keep recruiting activities outside of classroom and class hours; 3) Make student participation in recruiting activities optional.

There are many options for recruitment, and instructors can make recommendations for individual students. However, it may be useful to talk to your Jobs & Internships Specialist for advice or guidance to clarify relevant policies and restrictions. All CTE programs at PCC and most transfer programs have an assigned specialist:

- Jobs & Internships Specialist by Campus and Program  
<http://www.pcc.edu/resources/careers/students-grads/employment-services.html>

### Relevant Policies, Standards and Resources

- PCC Non-Discrimination and Non-Harassment Policy - <http://www.pcc.edu/about/affirmative-action/Nonharassment.html>
- PCC Privacy Policies - <http://www.pcc.edu/about/policy/privacy.html>
- On-site Civil Rights Review, Community College Self-Assessment Checklist, Section 8. Work Study, Cooperative Education and Job Placement (State of Oregon, Office of Educational Improvement & Innovation) - [http://spot.pcc.edu/jobs/civil\\_compliance\\_SECE.pdf](http://spot.pcc.edu/jobs/civil_compliance_SECE.pdf)
- State Law Regulating Minimum Wage and Payment of Wages (State of Oregon, Bureau of Labor and Industry) - [http://www.oregon.gov/boli/WHD/docs/statelawswages\\_english.pdf](http://www.oregon.gov/boli/WHD/docs/statelawswages_english.pdf)
- Consent to Release Confidential Information Form (PCC, Student Records) - <http://www.pcc.edu/resources/student-records/documents/consent.pdf>
- Recruiter and Employer Services (PCC, Panther Works) - <http://www.pcc.edu/resources/careers/employer-services/>