TO: Members of the Board of Trustees

FROM: President Sabah Randhawa on behalf of Melynda Huskey, Vice President for Enrollment and Student Services

DATE: December 9, 2022

SUBJECT: APPROVAL TO REPEAL SECTIONS 115, 116, 118 AND 119 AND AMEND SECTION 117 IN CHAPTER 516-38 WAC

PURPOSE: Action Item

Purpose of Submittal:
To obtain approval to repeal sections 115, 116, 118, and 119 and amend section 117 in Chapter 516-38 WAC under Western Washington University’s title in the Washington Administrative Code (WAC).

Proposed Motion:
MOVED, that the Board of Trustees of Western Washington University, upon recommendation of the President, approve the amendment to WAC 516-38-117 and approve the repeal of sections 115, 116, 118, and 119 in Chapter 516-38 WAC as filed in the Washington State Register, WSR 22-18-021.

Points to Consider:
The cancellation of university policy POL-U7300.01 Campus Services - Access to Career Planning and Placement Center led to review of Chapter 516-38 WAC. The content in the cancelled policy originated directly from sections within the WAC Chapter; thus, the decision was made by stakeholders to amend the WAC Chapter. It was determined that sections 115, 116, 118, and 119 were out of date and should be repealed and section 117 should be amended to better reflect current processes, define discrimination, and direct readers to the Career Services Center website. Stakeholder review included the following: Career Services Center, Technical Review Committee, and the University Policy and Rule Review Group. In addition, a public hearing was held to seek university and community comments.

Supporting Information:
Attachment 1 WAC 516-38-117 proposed amendment
Attachment 2 WAC 516-38-115, 116, 118, and 119 – proposed sections to be repealed
Attachment 3 Hearing Officer’s Report
WAC 516-38-115, 116, 118, and 119 – proposed sections to be repealed

WAC 516-38-115

Career planning and placement center.

The career planning and placement center provides (1) career planning services for undergraduates and (2) placement services for the following "eligible persons": Graduating seniors (who may establish placement credentials the quarter they become a senior), graduate degree or certificate candidates (including graduates of other institutions who may establish placement credentials upon earning thirty quarter credit hours toward advanced degree or certificate at Western) and alumni (who have received degrees or certificates from Western). Open lists of all employment opportunities and campus recruiting visits are maintained by the placement center for qualified students.

WAC 516-38-116

Career planning and placement center—Placement credentials—Fees.

Eligible persons may complete registration forms at the career planning and placement center establishing placement credentials to be placed in the center's placement credentials file. The center may charge fees for its services and its schedule of fees shall be prominently posted within the center. Placement center services may be denied any individual who fails to pay placement fees when due. The center shall not duplicate or mail incomplete credential files, individual recommendations or personal resumes. Credentials are confidential and may only be sent to legitimate prospective employers or transferred to other educational institutions for establishment there of placement credentials.

516-38-118

Job notification.

Notification of positions listed with the placement center shall be available without screening, selecting or promoting, only to registered candidates who have updated and activated their credentials; graduates of other colleges or universities
who have established reciprocity; and any bona fide employer who complies with federal and state laws against discrimination.

[Order 72-10, § 516-38-118, filed 11/17/72.]

516-38-119

Reciprocal services.

Requests from Western's candidates for service from another institution must be made by the placement director. The credentials of such candidates must be updated and active.
WAC 516-38-117  Recruitment activities. (1) Employers (hereafter called employers) interested in hiring students or alumni, and recruiting personnel from college or university graduate schools may conduct recruitment activity on campus. These activities shall be coordinated by the career services center subject to the following conditions:
   (a) Employers shall not be eligible to recruit on campus unless they comply with all federal and state laws against discrimination.
   (b) All interviewing arranged by the placement center shall be conducted in offices or space provided by the placement center.
   (c) Recruiters for school districts, business and industrial firms and government agencies may be assigned individual rooms and eligible persons required to adhere to prearranged interview schedules.
   (d) Recruiters for the military, Peace Corps and Vista may be assigned individual rooms and students may be interviewed on a "drop-in" basis.
   (e) All company literature and brochures shall be displayed either within the interviewing room or on placement center literature tables.
   (f) Poster boards and signs related to campus interviews may be posted on bulletin boards or other designated areas upon the approval of the placement center, in compliance with university policy.
   (g) Employers must comply with all university recruitment policies as listed on the career services center website.

(2) All prospective employers shall be free to present their points of view, and all students shall be free to determine whether they desire to listen to their presentations.

(3) To be eligible to sign up for recruitment interviews, candidates must meet the qualifications stipulated by the prospective employer. First priority on sign-up schedules shall be given students currently enrolled and eligible for placement services (provided they have established complete placement credentials with the placement center) and second priority shall be given alumni eligible for placement services (provided they have established complete placement credentials with the placement center).

REPEALER

The following sections of the Washington Administrative Code are repealed:

WAC 516-38-115  Career planning and placement center.
WAC 516-38-116  Career planning and placement center—Placement credentials—Fees.
WAC 516-38-118  Job notification.
WAC 516-38-119  Reciprocal services.
WWU RULE-MAKING REVIEW

Hearing Officer’s Report

WAC 516-38-115, Career Planning and Placement Center
WAC 516-38-116, Career Planning and Placement Center – Placement Credentials - Fees
WAC 516-38-117, Recruitment Activities
WAC 516-38-118, Job Notification
WAC 516-38-119, Reciprocal Service

On October 11, at 11:02 am, a public hearing was held via Zoom to receive comment regarding the proposal to repeal sections 115, 116, 118, and 119 as well as to amend section 117 in Chapter 516-38 WAC under Western Washington University’s title in the Washington Administrative Code (WAC). The hearing was conducted by Jennifer Sloan, Rules Coordinator, and the hearing was held pursuant to the authority provided in the Revised Code of Washington Open Public Meetings Act and Administrative Procedures Act.

The Hearing Officer’s Report is provided to President Sabah Randhawa for consideration of adoption of the proposed changes. Upon approval, the proposed changes will be presented to the Board of Trustees in December for adoption and will be effective 31 days after filing with the Code Reviser’s Office.

Notice of Hearing

Notice of public hearing was posted on the Rules Coordinator’s website, was published in the September 21, 2022, issue of the Washington State Register (22-18-021), and was posted in the University newspaper, The Front, and the University’s online newsletter, Western Today, on September 28, 2022.

Hearing Attendance

The hearing was attended by: Assistant Attorneys General Kerena Higgins, Julie Nicoll and Lisa LaGuardia; and Mindy Pelton, Associate Director, Career Services.

Background and Overview

On January 26, 2022, the University Policy and Rule Review Group (UPRRG) met to consider the cancellation of university policy POL-U7300.01 Campus Services-Access to Career Planning and Placement Center. Because the policy was out of date and no longer reflected current practices, the group recommended the policy be cancelled. On February 9, 2022, President Randhawa approved the cancellation of the policy. The policy content originated directly from sections within Chapter 516-38 WAC; thus, the decision was made by stakeholders to amend the WAC Chapter. It was determined that sections 115, 116, 118, and 119 were out of date and should be repealed and section 117 should be amended to better reflect current
processes, define discrimination, and direct readers to the [Career Services Center website](#). Stakeholder review included the following: Career Services Center, Technical Review Committee, and University Policy and Rule Review Group.

At the hearing, Mindy Pelton provided background stating that the language in the WAC is outdated in terms of the services the office provides. In the past, the office had placement files that individuals would pay to have sent to school districts. Now this happens electronically, and paper files are no longer used. Job postings would also be mailed out, but now this happens with recruitment platforms online. Regarding reciprocal services, this is no longer provided. Career Services Center now provides individual counseling, workshops, and events. The variety of services and events are readily available on the Career Services Center website.

**Testimony**

The Rules Coordinator reported that no written testimony was received.

**Audience Comments and Questions**

There were no audience comments or questions.

The hearing adjourned at 11:06 a.m.

**Conclusion**

Considering the thorough review process by university constituents and because the public hearing allowed for an open forum of the university community, I recommend the following:

➢ That President Randhawa approves the amendment to WAC 516-38-117 and the repeal of sections 115, 116, 118, and 119 in Chapter 516-38 WAC and further, that the proposed rule change be brought before the Board of Trustees for consideration.

Respectfully submitted,

Jennifer Sloan
Rules Coordinator

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Attachment:

WAC 516-38-117 proposed amendment  
WAC 516-38-115, 116, 118, and 119 – proposed sections to be repealed