



Equal Employment Opportunity (EEO) Plan 2020

Effective: November 9, 2020

**Greater Bridgeport Transit
Equal Employment Opportunity Plan (EEOP)**

Submitted: November 9, 2020

*This document has been prepared in accordance with the
Equal Employment Opportunity requirements set forth in FTA Circular 4704.1.
and Proposed Circular 4704.1A*

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TABLE of CONTENTS

Introduction | 1

GBT's Commitment to Civil Rights | 1

EEO Complaint Procedures | 3

Dissemination of GBT's EEOP | 6

EEO Officer's Responsibilities | 8

Designation of Responsibility | 11

Management Responsibilities | 12

Utilization Analysis –
GBT's Workforce and Regional Availability | 12

Four-Fifths Analysis of Employment Practices | 14

Short and Long Term Goals | 16

Assessment of Employment Practices | 17

Monitoring and Reporting | 22

APPENDIX

GBT EEOP 2020 Job Category Descriptions

Utilization Analysis

Four-Fifths Analysis

Board Resolution

INTRODUCTION

GBT's Commitment to Civil Rights

This document details Greater Bridgeport Transit's (GBT) program to ensure compliance with federal and state requirements related to the provision of Equal Employment Opportunities (EEO). It includes:

- GBT's Equal Employment Opportunity policy statement;
- Details of the program that GBT has undertaken to ensure equal employment opportunities including the commitment of qualified staff, and;
- An analysis of the impact of efforts detailing the extent to which GBT is reaching its EEO goals.

PAGE

1

EEO
PLAN



“No person in the United States shall, on the grounds of race, color, creed, national origin, sex or age be excluded from participation in, or denied the benefits of, or be subject to discrimination in employment under any project, program, or activity funded in whole or in part through financial assistance by the Federal Transit Administration.”

— Section 19 of the Urban Mass Transit Act of 1964

Statement of GBT's Equal Employment Opportunity Policy and its Key Principles

As a matter of principle, GBT will not discriminate against any employee or applicant for employment because of race, color, creed, national origin, gender or age. GBT will not discriminate against disabled individuals in accordance with the requirements of Section 504 of the Rehabilitation Act of 1973, as amended, and the Americans with Disabilities Act of 1990, as amended. Further, GBT will not discriminate because of age in accordance with the requirements of the Age Discrimination Act and the applicable provisions of State law. Under applicable regulations, GBT provides reasonable accommodations to qualified disabled individuals.

It is also the policy of GBT to provide equal employment and economic opportunity at every level without regard to race, color, sex, national origin, ancestry, religion, marital status, sexual orientation physical disability, or age. This policy applies to all phases of employment and economic opportunity, including: recruitment, selection, promotion, termination, layoffs, compensation, training and benefits. In support of this policy, GBT ensures:

1. **Commitment to Equal Employment Opportunity** – GBT will ensure that no person will be discriminated against or denied the benefits of any activity, program or employment process in the areas of recruitment, selection, promotion, termination, layoffs, compensation, training or benefits regardless of race, color, religion, age, sex, marital status, national origin or ancestry, sexual orientation or disability.
2. **Commitment to Affirmative Action** - GBT is committed to undertake all policies which afford equal opportunities for employment to all qualified persons without regard to race, color, religion, age, sex, marital status, national origin or ancestry, sexual orientation or disability and will undertake an Affirmative Action Program, including goals and timetables, in order to overcome the effects of any past discrimination on minorities and women.
3. **Responsibility for Implementation** – Every employee has a responsibility to ensure the success of the EEO policy. The responsibility for implementation of the EEO Program resides with GBT's EEO Officer.
4. **Responsibility of Management Personnel** – Managers and supervisors share in this responsibility and will be assigned specific tasks to ensure compliance is achieved. All managers and supervisors are responsible for fostering an atmosphere which is free of discrimination and harassment and are responsible for conducting their individual activities in a manner which values the rights of coworkers.
5. **Right of Applicants and Employees to File Complaints** – GBT is committed to making it easy for any applicant or employee to file an EEO complaint alleging discrimination with the EEO Officer or other appropriate official and has included the complaint process in this Plan.
6. **Performance of Management Relative to Success of the Program** – Managers and supervisors are advised of their responsibilities to ensure the success of the Program and are evaluated on the success of the EEO program in the same manner as their performance on other goals.
7. **Successful Achievement of EEO Goals** – GBT recognizes that the successful achievement of its EEO goals will provide benefits to GBT through fuller utilization and the development of previously underutilized human resources.

Douglas C. Holcomb, Chief Executive Officer
Thomas Gorman, Chief Operating Officer – November 9, 2020

EEO Complaint Procedures

GBT has adopted new procedures for investigating and monitoring EEO complaints, which are reported to the Federal Transit Administration at least triennially. These are detailed below.

Any person who believes that he or she, individually or as a member of any specific class of persons, has been subjected to discrimination in employment on the basis of race, color, creed, national origin, sex, age, or disability may file a written complaint with any of the following:

- Greater Bridgeport Transit;
- The Federal Transit Administration's Office of Civil Rights;
- Connecticut Department of Transportation Office of Civil Rights;
- Commission on Human Rights and Opportunities (CHRO); or
- The Equal Employment Opportunity Commission (EEOC).

Although it is recommended that EEO complaints be filed first with GBT, the complainant may file with the other agencies identified above. GBT will investigate and resolve such complaints at the lowest level possible. The process and procedures discussed below do not prohibit a complainant from filing a formal complaint with other state or federal agencies.

Filing a Complaint

An EEO complaint must be filed no later than one hundred eighty (180) days from the date the alleged discrimination occurred. This time limit will not apply to complaints of alleged unlawful practices of a continuous nature. Complainants must submit EEO complaints in writing by contacting GBT's EEO Officer.

Each complaint must include:

- The name, address and contact information of the complainant;
- The name of the person or department against which the charge is being made;
- A statement of facts contributing to the alleged discrimination including the date(s) of such act(s);
- A statement as to the basis for the alleged discrimination; and
- The name(s) of any witnesses to the alleged discrimination.

Complaints should be submitted to:

Chief Executive Officer/EEO Officer
Greater Bridgeport Transit
One Cross Street
Bridgeport, Connecticut 06610

When Additional Information is Needed

When a complaint is incomplete and additional information is needed during the investigation process, GBT's EEO Officer will contact the complainant to request the additional information. The complainant will have ten (10) business days to submit the requested information. Failure to provide the requested information by the required date may result in administrative closure of the complaint.

Assistance in Filing a Complaint

In cases where a complainant is unable to provide a written statement, a verbal complaint of discrimination may be made to the EEO Officer by telephone or in-person.

Investigation of EEO Complaints

All EEO complaints alleging discrimination are recorded and entered into GBT's EEO complaint file upon receipt. All complaints are investigated promptly and reasonable measures are taken to preserve any information that is confidential.

Typically, within ten (10) business days of receiving the complaint, the EEO Officer will provide written acknowledgement of the complaint.

The EEO Officer will meet with the complainant to review the allegations outlined in the charge to ensure that the allegations are accurately stated and fully understood. The goal of this meeting is to ensure that the complaint is clearly defined.

Interview of Department Leader and/or Individual Charged

Within ten (10) days from receipt of the complaint form, the EEO officer will notify the proper department leader and/or individual that a complaint of alleged discrimination has been filed and arrange an interview. During the interview with the department leader and/or individual, the EEO Officer will describe the nature of the complaint, the identity of the charging party and the events and facts which led to the complaint. The department leader will make available all personnel records, memoranda, data or any other evidence requested. Copies of confidential information will not be made a part of the written findings.

EEO Officer's Findings

The EEO Officer will examine all information gathered on the case. A written report will be prepared within (30) days following receipt of the complaint. The report will include:

- A summary of the charge(s);
- A summary of the complaint describing the nature of the alleged discriminatory activity stated by the complainant;
- A summary of the response by the department leader and/or person being charged with alleged discriminatory action;
- A summary of the investigation by the EEO Officer including any background on the conditions of complaint, persons involved, written statements, data or any other exhibits;
- The conclusion(s) of the EEO Officer; and
- Recommendation of action(s), if any.

This written report will be given to GBT's Chief Executive Officer for a final determination and resolution of the complaint. Upon the completion of the evaluation, and no later than ten (10) days following receipt of the report, copies of the final report will be submitted to:

- The complainant
- Department leader and/or individual involved

If the Complainant wishes to appeal the decision, he or she may do so in writing to the Chief Executive Officer within ten (10) days of the final determination.

GBT maintains a list of any active investigations conducted by any entity, including lawsuits or complaints which name the GBT alleging discrimination on the basis of race, color, creed, national origin, sex, age, or disability. This list includes the date of the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response to the investigation, lawsuit, or complaint.

EEO Complaint Process



Dissemination of GBT's EEO Policy/Program

GBT shares its EEO Policy and Plan with its employees in the following ways:

Internal Dissemination

GBT ensures its employees are aware of and understand its EEOP in the following ways:

1. Providing written communications from the CEO/GM
2. Posting official EEO materials (e.g., Federal and state labor laws poster(s)) and the agency's policy statement on bulletin boards, near time clocks, in employees' break rooms, and in the employment/personnel office
3. Including the EEO policy statement in the agency's personnel and operations manual, employee handbooks, reports and manuals
4. Meeting with top management officials (e.g., bus operations, human resources, planning, marketing, etc.) at least quarterly to discuss the EEOP and its implementation
5. Meeting with employees of protected classes and affinity groups to seek input on the program implementation
6. Conducting periodic EEO training for employees and for managers
7. Conducting EEO training for all new supervisors or managers within 30 days of their appointment

In addition to posting and publicizing the EEO policy statement, beginning in April 2016, GBT includes the policy statement in employee orientation materials and requires new employees to sign a form acknowledging they have read and understand the policy.

External Dissemination

When there is GBT outreach and/or advertising to recruitment entities (e.g., employment agencies, educational institutions, minority, and women organizations), GBT disseminates their EEO policy to those entities.

All recruitment ads (e.g., newspapers, magazines, websites, and social media) states that **"GBT is an equal employment opportunity employer."**

GBT typically recruits employees in the following periodicals and websites:

- CT Department of Labor (www.CTHires)
- Goodwill Career Centers – Career Boards and Open Houses
- Allstate Driving School – Career Center and Career Days
- NETTS Driving School – Career Days
- Career Resources – Career Fairs
- Transit Talent – Advertisements (transittalent.com)
- Housatonic Community College – Career Days
- Passenger Transport Classifieds

GBT also uses the Minority and Female Referral Directory prepared by the Connecticut Department of Transportation's Division of Contract Compliance as a resource for recruiting. This document contains:

- Sources for recruitment of females
- Sources for recruitment of minorities
- Technical Schools
- Connecticut Technical Colleges and State Schools
- National organizations devoted to the advancement of woman and minority business advancement (WTS).

Correspondance with EEO Partners

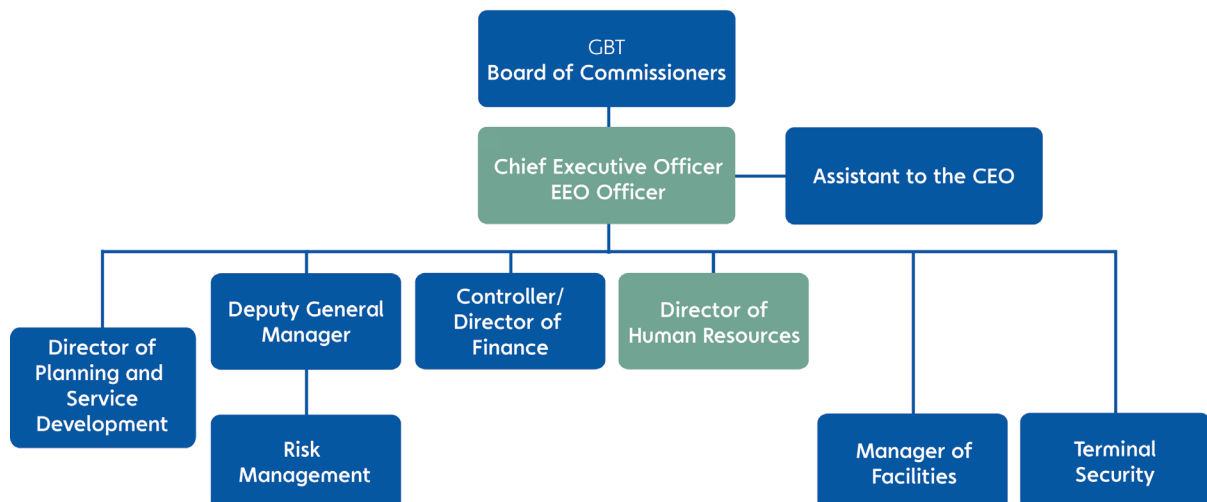
"The employment, policies and practices of Greater Bridgeport Transit are to recruit and employ qualified job applicants without discrimination based on race, color, sex, national origin, ancestry, religion, marital status, sexual orientation, physical disability, or age.

In order to continue to fulfill its responsibility to provide equal employment opportunity for all persons and to assist us in meeting our Affirmative Action goals, GBT requests your assistance in informing the members of your organization about the enclosed job vacancy and referring applicants to us for consideration for the position that accompanies this notice."

EEO Officers EEOP Responsibilities

GBT's EEO Officer has bottom bottom-line responsibility to for:

1. Developing the EEO policy statement and a written EEOP;
2. Overseeing collecting and analyzing employment data, identifying problem areas, setting goals and timetables, and developing programs to achieve goals;
3. Overseeing the designing, implementing, and monitoring internal audit and reporting systems to measure program effectiveness and to determine where progress has been made and where further action is needed;
4. Reviewing GBT's nondiscrimination plan with all managers and supervisors to ensure that the policy is understood and is followed in all personnel activities;
5. In conjunction with human resources, periodically reviewing employment practices policies (e.g., hiring, promotions, training), complaint policies, grievance procedures, and union agreements;
6. Reporting at least quarterly on each department's progress in relation to the agency's goals and on contractor and vendor compliance;
7. Serving as liaison between the agency, Federal, state, county, and local governments, regulatory agencies, minority, women, disability organizations, and other community groups;
8. Maintaining awareness of current EEO laws, and ensuring the laws affecting nondiscrimination are disseminated to responsible officials;
9. Overseeing investigations into complaints of discrimination;
10. Ensuring the provision of EEO training for employees and managers;
11. In conjunction with human resources, advising employees and applicants of available training programs and professional development opportunities and the entrance requirements;
12. Ensuring all hires and promotions ensuring compliance with GBT's EEOP; and
13. Ensuring postings of the EEO policy statement to ensure compliance information is posted and up-to-date.



Agency Wide Responsibilities

Although GBT's EEO Officer is primarily responsible for implementing the EEOP, all of GBT's officials, managers, and supervisors are responsible for carrying out EEO. All managers—from the supervisor of the smallest unit to the Board Chair or CEO/GM—bear responsibility for ensuring that EEO policies and programs are carried out.

EEO responsibilities for agency officials, supervisors and managers include:

1. Participating actively in periodic reviews of all aspects of employment to identify and to remove barriers obstructing the achievement of specified goals and objectives;
2. Holding regular discussions with other managers, supervisors, employees, and affinity groups to ensure agency policies and procedures are being followed;
3. In conjunction with the EEO Officer, maintaining and updating the personnel database for generating reports required for the nondiscrimination program;
4. Cooperating with the EEO Officer in review of information and investigation of complaints; and
5. Encouraging employee participation to support the advancement of the EEOP (e.g. professional development and career growth opportunities, posting promotional opportunities, shadowing, mentoring)

Effective oversight of the EEOP requires all staff. To assist the EEO Officer in the many tasks associated with a sound EEO program, GBT has appointed its Director of Human Resources to serve as GBT's EEO Director. This position assists the EEO officer with the many day-to-day requirements in the EEOP.

In 2013, GBT established an EEO advisory committee that reflects all segments of GBT's workforce. This group meets periodically (typically quarterly), to discuss GBT's EEOP activities.

An Effective EEO Program requires:

Sensitivity to, and an awareness of, the varied ways in which discrimination occurs

Commitment to EEO goals and objectives

Knowledge of civil rights laws, policies, rules, regulations, and guidelines

Authority and ability to work and communicate with others to achieve EEO goals and objectives

The Role of Human Resources

The job description of GBT's Director of Human Resources is reflective of the position of assisting GBT's EEO Officer and is illustrative of the responsibilities expected including:

- Possessing current knowledge of civil rights precepts, policies, rules, regulations and Guidelines;
- The development of policy and policy statements;
- Internal and external EEO communications;
- Collecting and analyzing employment data and identifying and correcting problems;
- Serving as liaison between GBT and federal, state and local government agencies on EEO related matters;
- Establishing outreach sources to recruit minorities, women and persons with disabilities;
- Processing all employment related discriminatory complaints;
- Providing internal career counseling for all employees;
- Advising managers and supervisors that their work performance is evaluated based on their EEO efforts and results;
- Participating in periodic audits of all aspects of employment to ensure that each agency unit is in compliance;
- Leading quarterly meetings with the senior staff regarding the current state of GBT's EEO efforts and documenting the outcome of these meetings;
- Consistently demonstrating a sensitivity to, and awareness of, the varied ways in which Discrimination occurs;
- Scheduling and leading periodic staff training regarding discrimination;
- Reviewing and making recommendations to management for continued improvement of policies, procedures and practices relating to personnel matters;
- Working directly with all staff members to assist them in carrying out their respective responsibilities relative to personnel matters and to establish department goals and objectives;
- Keeping management advised of potentially deficient areas with recommendations for implementing solutions as appropriate;
- Representing GBT at hearings conducted by outside agencies (such as the Connecticut Commission on Human Rights & Opportunities, Equal Employment Opportunities Commission, and Department of Labor) in matters relating to complaints alleging Discrimination;
- Participating in various community-oriented activities and organizations which address issues of discrimination and equal opportunities;
- Reviewing all applications for employment and working with applicants seeking employment and department leaders seeking new employees;
- Assures that current legal information affirmative action is disseminated to responsible Officials; and
- Stays actively involved with local minority and women's organizations, organizations related to persons with disabilities, community action organizations and community service organizations designed to promote EEO.

GBT's Human Resource Director's Community Engagement and Involvement

The following are some examples of GBT's EEO Coordinator Activities since the last EEO Update:

- Mercy Learning Center – Employment Trainer – GBT Staff Conducts Mock Interviews for Women
- Bridgeport Regional Business Council – BRBC Chamber of Commerce, Board Participation
- Rotary Club of Bridgeport President
- Bridgeport Rotary Foundation Chairwoman Community Career Fairs Four Annually
- Career Resources, Board Member, 2018 to present
- Awarded Workplace Diversity Award, 2017
- Juneteenth Community Service Award, 2019
- Off the Streets, Bridgeport Volunteer
- National Council for Community Behavioral Healthcare
- Social Service Advisory Committee Member, Alliance for Community Empowerment, Inc., 2015-present
- Women's Mentoring Network Mentor
- Women's Mentoring Network, Mentor of the Year Award, 2019
- Poverty Simulation Participant, Veterans Affairs and Fairfield University, 2015 to present
- Stem Excellence – Certified, 2020
- School Volunteer Association, Volunteer 2001 to present
- Certified Domestic & Sexual Violence State of CT, 2017, 2018, 2019
- Career Panel Participant, 2020
- On-line Job Readiness Mock Interviews, 2020
- Southwestern CT Agency on Aging – Senior Medicare Patrol Volunteer, 2019 - present

Designation of Personnel Responsibility GBT's EEO Officer

GBT's Chief Executive Officer has been designated EEO Officer. The EEO Officer is identified, by name, on all relevant internal and external communication, as well as notices regarding GBT's EEO Program. The CEO is aware of the duties pertaining to GBT's EEO Program.

Management Responsibilities

Because carrying out the EEO program is an integral function of all staff, Officers, Managers, and Supervisors at GBT are assigned the following responsibilities:

- Assisting in the identification of problem areas and establishing departmental goals and objectives which reflect the agency's overall goals, and
- Participating actively in periodic audits of all aspects of employment to identify and remove barriers obstructing achievement of EEO goals and objectives.

Utilization Analysis – GBT's Workforce and Regional Availability

Utilization Analysis

GBT has prepared a utilization and availability analysis as part of its EEOP. The utilization analysis identifies job categories that have an underutilization and/or concentration of minorities and women in relation to their availability in the relevant labor market. The analysis also establishes the framework for goals and timetables to correct employment practices that contributed to any identified underutilization or concentration. This analysis, which is based on categories and data used in the EEOC EEO-4 report, consists of a workforce analysis and an availability analysis.

The workforce analysis includes the number of employees and salary ranges for each job category in the EEO-4 report for the following subcategories for men and women:

- White (not Hispanic or Latino)
- American Indian/Alaska Native (not Hispanic or Latino)
- Black or African American (not Hispanic or Latino)
- Hispanic or Latino
- Asian (not Hispanic or Latino)
- Native Hawaiian and Other Pacific Islander (not Hispanic or Latino)
- Two or more races (not Hispanic or Latino)

For the utilization analysis, GBT used the following Job Categories:

- Officials and Administrators
- Professionals
- Technicians
- Administrative Support Workers
- Skilled Craft Workers
- Service and Maintenance Workers

The EEO definition for each of these positions is included in this program's Appendix.

The utilization analysis of GBT's current staff revealed underutilization in the following areas:

Officials and Administrators – White Females 21% Underutilization (Gap of 2)

Professionals – No Underutilization

Administrative Support – White Females Underutilization – 17% (Gap of 2)

Skilled Craft Workers – No Underutilization

Service and Maintenance (Includes Drivers):

Asian Males Underutilization – 2% (Gap of 1)

White Females Underutilization – 19% (Gap of 21)

Asian Females – Underutilization – 2% (Gap of 1)

Regarding the underutilization of white females among GBT driver and maintenance groups, it is noteworthy that of the nearly two hundred applications for these positions received during this report period, there were only two white female applicants.

The complete utilization analysis by Job Category is included in this program's Appendix.

Impact of Employment Practices on Minorities and Woman

GBT has prepared statistical data that show any potential impact of employment practices on minorities and women since the last EEOP submission. This includes:

1. The number of applicants for employment in each job category and the number hired, cross-referenced by sex and race;
2. The number of employees in each job category who applied for promotion or transfer and the number in each job category promoted or transferred, cross-referenced by race and sex;
3. The number of involuntary terminations, cross-referenced by gender and race



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Four-Fifths Analysis of Employment Practices

In 1978, four government agencies (EEOC, Department Of Labor, Department of Justice, and the Civil Service Commission) adopted a set of guidelines known as the Uniform Guidelines for Employee Selection Procedures, which provided information on what constitutes a discriminatory test surrounding employment testing, as well as all personnel decisions. They focused on when a personnel process has adverse or disparate impact and how an employer can defend a process that has been identified as having adverse impact. Adverse impact can occur when identical standards or procedures are applied to everyone, despite the fact that they lead to a substantial difference in employment outcomes for the members of a particular group.

Typically, adverse impact is determined by using the four-fifths or eighty percent rule. The four-fifths or 80% rule is described by the guidelines as "a selection rate for any race, sex, or ethnic group which is less than four-fifths (or 80%) of the rate for the group with the highest rate will generally be regarded by the Federal enforcement agencies as potential adverse impact, while a greater than four-fifths rate will generally not be regarded by Federal enforcement agencies as evidence of adverse impact." Since the 80% test does not involve probability distributions to determine whether the disparity is a "beyond chance" occurrence, it is usually not regarded as a definitive test for adverse impact. Instead, other statistically significance tests, such as the standard deviation analysis, may be used for this purpose.

If an employment process reveals evidence of potential adverse impact, it is important that the agency is able to justify its personnel processes and decisions. The presence of adverse impact does not require the elimination of the procedure (e.g. selection, promotion), but rather its justification as being job-related or a business necessity. Business necessity means that using the procedure is essential to the safe and efficient operation of the business—and there are no alternative procedures that are substantially equally valid and would have less potential for adverse impact.

Source: <http://www.workplace-dynamics.com/impact%20ratio%20analysis.php>

This program contains the results of GBT's first Four-Fifths Analysis of Employment Practices using tables provided by the Federal Transit Administration (FTA). The data used represents hire, promotion and termination numbers since the last update of this plan (calendar years 2017 and 2020).

The tables containing the analyses are included in the Appendix. The results indicate the following:

Hires

Officials and Administrators: No Adverse Impacts

Professionals: Potential Adverse Impacts Among White Males and Females

Administrative Support: No Adverse Impacts

Service and Maintenance: Potential Adverse Impacts Among Black Males, and Hispanic Males and Females

Promotions – The four-fifths analysis indicated no potential adverse impacts in the area of promotions.

Terminations (Involuntary) – The four-fifths analysis indicated potential adverse impacts among Black males in administrative support positions, and among Black males and Hispanic males and females.

Considerations Related to the Four-Fifths Analysis

- It is noteworthy that since the four-fifths analysis does not involve probability distributions to determine whether a potential adverse impact is a "beyond chance" occurrence, it is usually not regarded as a definitive test for adverse impact.
- The presence of a possible adverse impact does not necessarily require the elimination of any procedure (e.g. selection, promotion), but rather a justification as being job-related or a business necessity.
- The information for the analyses is derived from voluntary disclosures made by job candidates.
- GBT will continue to monitor its employment practices regarding hires, promotions, terminations and training and believes its employment procedures are thoughtful, fair and important to the safe and efficient operation of the service.

Veterans and Persons with Disabilities

GBT depends on information provided by employment candidates through voluntary disclosures. Very little data has been provided during this report period. This information has been included in the analysis tables in the Appendix. Duringn this report period, only one applicant noted "Veteran" on the voluntary disclosure and only one applicant noted a disability.

Labor Analysis Data

The labor analysis included in this program was prepared using the U.S. Census American Fact Finder - Detailed Census Occupation by Sex, and Race/Ethnicity for Residence Geography for Fairfield County and New Haven Counties, Connecticut.

The Census EEO data is sponsored by four Federal agencies consisting of the Equal Employment Opportunity Commission (EEOC), the Employment Litigation Section of the Civil Rights Division at the Department of Justice (DOJ), the Office of Federal Contract Compliance Programs (OFCCP) at the Department of Labor, and the Office of Personnel Management (OPM). The complete census data is available by contacting GBT.

Short and Long Term Goals to Address Underutilization

Ongoing Efforts to Monitor and Promote Equal Employment Opportunities

Long Term Goals – Looking ahead beyond two years, GBT foresees no major change in the total number of employees in any of the analyzed job categories. This is because there are no planned expansions or contractions of services expected over the next three to five years.

As a result, reaching parity in the areas of underutilization will need to be addressed through turnover in the current staff with no general change in the overall staff levels of each job category.

GBT will ensure that its Human Resource staff and all managers fully understand the areas of under utilization and work to close the identified gaps (predominantly focusing on increasing the participation of women in the identified areas) through the recruiting process when a position opens and through internal promotions when the opportunities arise.

Short Term Goals – As of the writing of this Plan, GBT, like all transit agencies, is in the middle of a pandemic. The COVID-19 virus has created great uncertainty regarding the immediate future of the agency. However, is recruiting for numerous positions including drivers, mechanics, service lane staff and supplemental bus cleaners. Staff are aware of the underutilizations and are working to fill these positions in a manner reflective of the analysis with the short-term goal of closing the identified gaps.

Assessment of Employment Practices

Recruitment/Recruitment Methods

GBT's recruitment process begins when a supervisor/manager notifies Human Resources of an opening with a "Request for Job Advertisement" form.

1. Human Resources meets with Department Heads to explore opportunities for promotion or internal transfers;
2. Open positions are posted internally on designated bulletin boards throughout agency and available to all staff;
3. Advertisements are placed in a variety of news outlets both electronic and print;
4. Advertisements are placed in profession related publications (APTA, Transittalent.com);
5. Advertisements are placed with Women Transit Seminar (WTS);
6. Open positions are also posted GBT's website;
7. Open positions are also at career fairs;
8. Postings of open positions are mailed to a database of EEO Contacts (currently thirty nine) maintained by the HR Director; and
9. Open positions are also promoted through ongoing community outreach.

Additionally:

1. GBT's EEO Director maintains relationships with welfare-to-work and job service staff at local job development offices;
2. Internship Opportunities are sometimes offered for High School Students;
3. Presentations about careers in transportation are made through local outreach; and
4. GBT's EEO Director also participates in GBT's ongoing community engagement.

Position Descriptions

Position descriptions are updated and used to both retain and attract top talent. In addition, position descriptions are often used as a job advertisement. Position descriptions are crafted with a look ahead to where the agency and position is leading and are developed by department leaders in conjunction with GBT's Human Resource Department.

Interview Procedures

GBT's Human Resource Department and the appropriate supervisor/manager meet to develop the job qualifications and structured interview(s). Based on original requisition, they will determine the method(s) used to fill the vacancy (job posting, promotion, outside candidates, applicant files).

If an EEO deficiency or underutilization exists; they will determine what additional measures can be taken to attain parity. The Department of Human Resources is responsible for conducting the search. This includes job posting, advertisement placement and related recruitment activities. The Department of Human Resources also coordinates with department leaders and structured panel interviews in order to foster the most valuable comparisons between candidates. This process fosters collaborative conversations between panelists. Behavioral and job specific questions are asked. Candidates also have the opportunity to assess the team they may be joining.

Employment Selection

The interviewers are responsible for conducting a structured interview (numeric grading of responses to pre-determined questions) with each of the qualified candidates to ensure that selections are based on valid and job related criteria. All candidates accepted for employment are required to pass a background check, drug screen and pre-employment physical before a hiring decision is final. If a current employee is accepting a position that is considered sensitive (such as handling cash or finances), a new background check will be conducted.

Additionally:

1. GBT's Department of Human Resources reviews and modifies the employment applications based on updates to human resources laws and best practices; and
2. Human Resources discusses and evaluates, in conjunction with the EEO Officer and Committee, different selection tools that may reduce any bias associated with existing tools and ensures that there are no barriers to diversity and increase utilization.
3. **GBT's EEO Officer must concur that the EEO process is in accordance with GBT's EEO Plan and other relevant policies and procedures.**

Administering Tests

GBT does not use written, formal, or scored tests in the employment selection process.

Promotional Procedures

Bargaining unit promotions are generally governed by contract. For promotions, qualifications for the position will be reviewed, including related work experience, education and job performance. Qualified candidates are scheduled for an interview. Human Resources works closely with bargaining unit and non-bargaining unit for internal candidates who have the potential for growth/promotion. For bargaining unit employees, seniority and progression are detailed in the collective bargaining agreement. Non-bargaining unit promotions procedures are provided in GBT's employee handbook.

Regardless of Union vs. Non Union status, GBT works to encourage success in its employees and provides for internal promotion opportunities. For this program, GBT reviewed the current paths to promotion by department. Progression for GBT's Maintenance and Operations divisions are illustrated below.

Maintenance Progression



Operations Progression



These graphics indicate the typical progression in the two largest divisions of the GBT operation.

Transfer Procedure

Employees who have been in their current position for (generally) at least one year may apply for internal openings as they occur. This one year period may be waived with the consent of the employee's manager and the Human Resource Director. Employees must complete an updated resume.

Prior to this most recent review of GBT employment procedures, the resume of the internal applicant was required to be submitted to the Human Resources Department within the first week the job is posted. Staff considered unduly restrictive and a possible barrier to internal promotions. As a result, the window for application was extended to two weeks. All applicants for a position are considered on the basis of their qualifications, ability to perform the job successfully and an interview. Once transferred, employees will enter into a probationary period for the new position.

Training to employees, personnel, and management staff on proper interview techniques - In April of 2016, GBT's Department of Human Resources provided training to all staff involved in recruiting and selection. The training focused on ensuring that all staff at GBT who participate in recruiting, interviews, hires, promotions, training, or issues discipline understand and use objective, job-related standards.

Counseling and Training to Assist Employees in Identifying Promotional Opportunities

GBT undertakes the following activities and programs to ensure that employees who are women or minorities have equal opportunity for all promotions and other advancement opportunities:

1. All job opportunities are posted in common areas of GBT facilities known to all employees;
2. All employees with proper credentials are encouraged to apply for opportunities within GBT;
3. Training programs for various job categories are offered equally to employees in the respective categories;
4. GBT's Human Resource Director conducts extensive outreach in the GBT community to encourage the participation of minorities and women as candidates for opportunities at GBT;
5. GBT's Human Resource Director regularly meets with employees who have questions about new opportunities at GBT;
6. In some cases, GBT offers employees who are selected for advancement the opportunity to return to their original position within a certain time frame allowing employees to test their interest in a new position;
7. GBT regularly evaluates job requirements for promotional and other advancements. It is noteworthy that a recent review lead to the elimination of the requirement for a Graduate Equivalency Diploma for Fare Box Pullers.
8. GBT offers an Employee Assistance Program (EAP) to help employees who are struggling in their current positions as well as remedial training to assist employees to keep their positions; and

9. For non-bargaining unit employees, GBT offers a periodic Complete Performance Improvement Program (CPIP) which probes the employees interests in career advancement and leads to agreements to reach the desired goals where possible.

Seniority Practices

Eighty-four percent of GBT employees are bargaining unit members. Seniority for bargaining unit employees is detailed in the current collective bargaining agreement between GBT and ATU1336. Operator and maintenance personnel seniority is a function of the employees start date and progresses over time as new operators/maintenance personnel are hired. There are no seniority practices applicable to non-bargaining unit members.

Training Programs

GBT provides various training tracks (operations, maintenance, safety and compliance, new technology, planning and others) for employees including new hire and in service training. In all cases, all staff are required to attend training sessions. For example, when driver training is provided, it is mandatory for all members of that job classification and attendance records are maintained.

Compensation and Benefits

Wages and benefits for bargaining unit staff are negotiated and included in the collective bargaining agreement which currently represents approximately 84% of GBT employees.

Salary for non-bargaining unit employees are based on position grade and industry trends and reviewed from time-to-time. Non bargaining unit benefits are the same for all non-bargaining unit employees with the exception of vacation accrual which is based on time with the agency.

For bargaining unit employees, wages and benefits are detailed in the collective bargaining agreement. Non bargaining unit benefits are provided in the employee handbook.

Disciplinary, Discharge and Termination Procedures

Decisions regarding discipline are guided by GBT's collective bargaining agreement, employee handbook, work rules and other policies and procedures promulgated from time to time. Discipline and terminations are conducted with input from Supervisors, Managers, Department Heads, the Director of Human Resources and GBT's EEO Officer.

For bargaining unit employees, discipline is detailed in the collective bargaining agreement and associated work rules. Non-bargaining unit discipline is included in the employee handbook.

GBT also has established a clear process for issuing discipline, overseen by its Manager of Transportation Operations, including a detailed investigation of the events leading to the discipline and a review of employment histories to ensure correct progression.

Monitoring and Reporting

GBT has initiated an EEO monitoring and reporting system to serve the following purposes:

- To assess EEO accomplishments;
- To enable GBT to evaluate the EEO program and to take any necessary corrective action regarding the development and execution of programs or goals and timetables;
- To identify those departments which have failed to achieve goals or to implement affirmative action; and
- To develop a precise and factual database for future projections.

The monitoring and reporting system consists of the following components:

- **Quarterly** – The EEO Officer and GBT's Department of Human Resources will prepare a report of all employment actions taken during the previous quarter, including recruitment, selection, promotions, terminations, transfers, layoff, compensation, training, and benefits, for review by the EEO Officer. For example, all employment actions taken from July 1 – September 30 will be recorded in a report prepared for review by the EEO Officer no later than October 31.
- **Annually** – GBT's EEO Officer will prepare a report of all efforts made during the previous year to promote the EEO program and achieve the goals outlined GBT's EEO program. This report will include participation in job fairs, contacts made by the EEO Officer, Human Resource staff or management personnel with minority and female employees regarding promotional opportunities, and any other efforts taken to promote the EEO program to employees and the community. Management personnel are responsible to report such contacts made with employees and/or promotion of the EEO program to the EEO Officer during the first two weeks of the month following completion of the previous quarter. The EEO Officer oversees the preparations of a summary report for review by leadership. All efforts made from January 1 – December 31 will be recorded in a report prepared for review by the CEO no later than January 31.
- The EEO Officer will evaluate the quarterly reports and any input received from employees, management personnel, and the citizen advisory panel. Based upon the report data and input, the EEO Officer will assess EEO accomplishments and recommend corrective action or adjustments regarding the development and execution of programs or goals and timetables.
- The CEO, in conjunction with the Department of Human Resources and other management personnel, will evaluate the impact of employment processes on EEO goals and timetables, and adjust any practices or procedures that are found to contribute to underutilization or to create a barrier to equal employment opportunity.

Cumulative Records

GBT maintains cumulative records on applicants, hires, transfers, promotions, training and termination. These records provide current information needed to prepare targets and to identify if and where the program isn't working or working effectively enough to meet the goals.

Questions/Comments

If you have questions about GBT's EEO Plan or would like additional information, please contact:

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APPENDIX

GBT EEOP 2020 Job Category Descriptions

Utilization Analysis

Four-Fifths Analysis

Board Resolution - Coming on December 9, 2020

GBT EEOP 2020 Job Category Descriptions

For the utilization analysis, GBT used the following Job Categories (EEO-4 State and Local Governments):

Officials and Administrators: Occupations in which employees set broad policies, exercise overall responsibility for execution of these policies, or direct individual departments or special phases of the agency's operations, or provide specialized consultation on a regional, district or area basis. Includes: department heads, bureau chiefs, division chiefs, directors, deputy directors, controllers, wardens, superintendents, sheriffs, police and fire chiefs and inspectors, examiners (bank, hearing, motor vehicle, warehouse), inspectors (construction, building, safety, rent-and- housing, fire, A.B.C. Board, license, dairy, livestock, transportation), assessors, tax appraisers and investigators, coroners, farm managers, and kindred workers.

Professionals: Occupations which require specialized and theoretical knowledge which is usually acquired through college training or through work experience and other training which provides comparable knowledge. Includes: personnel and labor relations workers, social workers, doctors, psychologists, registered nurses, economists, dietitians, lawyers, systems analysts, accountants, engineers, employment and vocational rehabilitation counselors, teachers or instructors, police and fire captains and lieutenants, librarians, management analysts, airplane pilots and navigators, surveyors and mapping scientists, and kindred workers.

Technicians: Occupations which require a combination of basic scientific or technical knowledge and manual skill which can be obtained through specialized post-secondary school education or through equivalent on-the-job training. Includes: computer programmers, drafters, survey and mapping technicians, licensed practical nurses, photographers, radio operators, technical illustrators, highway technicians, technicians (medical, dental, electronic, physical sciences), police and fire sergeants, inspectors (production or processing inspectors, testers and weighers), and kindred workers.

Protective Service Workers: Occupations in which workers are entrusted with public safety , security and protection from destructive forces. Includes: police patrol officers firefighters, guards, deputy sheriffs, bailiffs, correctional officers, detectives, marshals, harbor patrol officers, game and fish wardens, park rangers (except maintenance), and kindred workers.

Paraprofessionals: Occupations in which workers perform some of the duties of a professional or technician in a supportive role, which usually require less formal training and/or experience normally required for professional or technical status. Such positions may fall within an identified pattern of staff development and promotion under a "New Careers" concept. Included: research assistants, medical aides, child support workers, policy auxiliary welfare service aides, recreation assistants, homemakers aides, home health aides, library assistants and clerks, ambulance drivers and attendants, and kindred workers.

Administrative Support (Including Clerical and Sales): Occupations in which workers are responsible for internal and external communication, recording and retrieval of data and/or information and other paperwork required in an office. Includes: bookkeepers, messengers, clerk-typist, stenographers, court transcribers, hearing reporters, statistical clerks, dispatchers, license distributors, payroll clerks, office machine and computer operators, telephone operators, legal assistants, sales workers, cashiers, toll collectors, and kindred workers.

Skilled Craft Workers: Occupations in which workers perform jobs which require special manual skill and a thorough and comprehensive knowledge of the process involved in the work which is acquired through on-the-job training and experience or through apprenticeship or other formal training programs. Includes: mechanics and repairers electricians, heavy equipment operators, stationary engineers, skilled machining occupations, carpenters, compositors and typesetters, power plant operators, water and sewage treatment plant operators, and kindred workers.

Service-Maintenance: Occupations in which workers perform duties which result in or contribute to the comfort, convenience, hygiene or safety of the general public or which contribute to the upkeep and care of buildings, facilities or grounds of public property. Workers in this group may operate machinery. Includes: chauffeurs, laundry and dry cleaning operatives, truck drivers, bus drivers, garage laborers, custodial employees, gardeners and groundkeepers, refuse collectors, construction laborers, park rangers (maintenance), farm workers (except managers), craft apprentices/trainees/helpers, and kindred workers.

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V		
1	Job Category	Salary Range (\$XX,000-XX,000)	Total Workforce					Male							Female									
2	Use EEO-4		All	WM	MM	WF	MF	W	AI/AN	B	H/L	A	NHOPI	Multi	W	AI/AN	B	H/L	A	NHOPI	Multi			
45	4 - Protective Service: Sworn																							
46	Current Workforce		0	0	0	0	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	<--		
47	Percent in Category	^Entry						-	-	-	-	-	-	-	-	-	-	-	-	-	-			
48	Percent of Availability							0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%<--		
51	Percent Underutilized																							
52	Underutilized (Yes/No)								No	No	No	No	No	No	No	No	No	No	No	No	No			
53	Number Needed to Reach Parity								-	-	-	-	-	-	-	-	-	-	-	-	-			
54	Planned percent increase Year 1																					<--		
55	Planned percent increase Year 2																					<--		
56	Planned percent increase Year 3																					<--		
57	Planned percent increase Year 4																					<--		
58																								
	5 - Protective Service: Non-sworn																							
59	Current Workforce		0	0	0	0	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	<--		
61	Percent in Category	^Entry						0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%			
62	Percent of Availability							0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%<--		
65	Percent Underutilized																							
66	Underutilized (Yes/No)								No	No	No	No	No	No	No	No	No	No	No	No	No			
67	Number Needed to Reach Parity								-	-	-	-	-	-	-	-	-	-	-	-	-			
68	Planned percent increase Year 1																					<--		
69	Planned percent increase Year 2																					<--		
70	Planned percent increase Year 3																					<--		
71	Planned percent increase Year 4																					<--		
72																								
	6 - Administrative Support																							
74	Current Workforce	\$60,000 -\$95,000	12	0	5	3	4	-	-	4	1	-	-	-	3	-	1	2	1	-	-	<--		
75	Percent in Category	^Entry			41.7%	25.0%	33.3%	0.0%	0.0%	33.3%	8.3%	0.0%	0.0%	0.0%	25.0%	0.0%	8.3%	16.7%	8.3%	0.0%	0.0%			
76	Percent of Availability							27.6%	1.0%	4.2%	3.1%	1.6%	0.0%	0.0%	42.3%	1.0%	7.6%	5.2%	2.0%	0.0%	0.0%	<--		
79	Percent Underutilized														17%									
80	Underutilized (Yes/No)								No	No	No	No	No	No	Yes	No	No	No	No	No	No			
81	Number Needed to Reach Parity								-	-	-	-	-	-	2	-	-	-	-	-	-			
82	Planned percent increase Year 1																					<--		
83	Planned percent increase Year 2																					<--		
84	Planned percent increase Year 3																					<--		
85	Planned percent increase Year 4																					<--		
86																								

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	
1	Job Category Use EEO-4	Salary Range (\$XX,000-XX,000)	Total Workforce					Male							Female								
2			All	WM	MM	WF	MF	W	AI/AN	B	H/L	A	NHOPI	Multi	W	AI/AN	B	H/L	A	NHOPI	Multi		
87	7 - Skilled Craft																						
88	Current Workforce	\$45,000-\$80,000	13	2	11	0	0	2	-	8	3	-	-	-	-	-	-	-	-	-	-	<--	
89	Percent in Category	^Entry		15.4%	84.6%			15.4%	0.0%	61.5%	23.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
90	Percent of Availability							59.1%	0.0%	6.4%	14.0%	1.4%	0.0%	0.0%	2.3%	0.0%	6.0%	1.3%	5.0%	0.0%	0.0%	<--	
93	Percent Underutilized																						
94	Underutilized (Yes/No)								No	No	No	No	No	No	No	No	No	No	No	No	No		
95	Number Needed to Reach Parity								-	-	-	-	-	-	-	-	-	-	-	-	-		
96	Planned percent increase Year 1																					<--	
97	Planned percent increase Year 2																					<--	
98	Planned percent increase Year 3																					<--	
99	Planned percent increase Year 4																					<--	
100																							
101	8 - Service & Maintenance																						
102	Current Workforce	\$60,000-\$90,000	111	7	74	1	29	7	-	51	23	-	-	-	1	-	21	8	-	-	-	<--	
103	Percent in Category	^Entry		6.3%	66.7%	0.9%	26.1%	6.3%	0.0%	45.9%	20.7%	0.0%	0.0%	0.0%	0.9%	0.0%	18.9%	7.2%	0.0%	0.0%	0.0%		
104	Percent of Availability							23.9%	0.1%	7.9%	9.3%	1.8%	0.0%	0.0%	20.2%	0.0%	9.0%	7.9%	1.7%	0.0%	0.0%	<--	
107	Percent Underutilized											2%			19%			1%	2%				
108	Underutilized (Yes/No)								No	No	No	Yes	No	No	Yes	No	No	No	Yes	No	No		
109	Number Needed to Reach Parity								-	-	-	1	-	-	21	-	-	-	1	-	-		
110	Planned percent increase Year 1																					<--	
111	Planned percent increase Year 2																					<--	
112	Planned percent increase Year 3																					<--	
113	Planned percent increase Year 4																				<--		
114																							
115	Notes:																						
116																							
117																							
118																							

[illegible]

Four-Fifths Adverse Impact Analysis by Job Category Hires

Job Category (Use EEO-4)	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Selection Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
8 -Service & Maintenance																
Number Applied	129	61	5	3	-	-	100	39	22	18	2	1	-	-	-	-
Total Hires	24	20	2	1	-	-	14	14	6	5	2	-	-	-	-	-
Selection Rate	18.6%	32.8%	40.0%	N/A	N/A	N/A	14.0%	35.9%	27.3%	27.8%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	56.7%	100.0%	100.0%	N/A	N/A	N/A	35.0%	89.7%	68.2%	69.4%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	Yes	No	No	N/A	N/A	N/A	Yes	No	Yes	Yes	N/A	N/A	N/A	N/A	N/A	N/A

Notes:

Persons with Disabilities	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Number Applied	1	1	-	-	-	-	1	-	-	1	-	-	-	-	-	-
Total Hires	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	0.0%	0.0%	N/A	N/A	N/A	N/A	0.0%	N/A	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Veterans	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Number Applied	-	-	-	-	-	-	1	-	-	-	-	-	-	-	-	-
Total Hires	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	N/A	N/A	N/A	N/A	N/A	N/A	#DIV/0!	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Notes:

Four-Fifths Adverse Impact Analysis by Job Category

[illegible]

**Four-Fifths Adverse Impact Analysis by Job Category
Promotions**

Job Category (Use EEO-4)	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
7 - Skilled Craft																
Number Applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Promotions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
8 -Service & Maintenance																
Number Applied	3	-	-	-	-	-	3	-	-	-	-	-	-	-	-	-
Total Promotions	3	-	-	-	-	-	3	-	-	-	-	-	-	-	-	-
Selection Rate	100.0%	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	N/A	N/A	N/A	N/A	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Notes:

Persons with Disabilities	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Number Applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Promotions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Veterans																
Number Applied	2	-	2	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Promotions	2	-	2	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Notes:

Four-Fifths Adverse Impact Analysis by Job Category

[illegible]

**Four-Fifths Adverse Impact Analysis by Job Category
Terminations**

Job Category (Use EEO-4)	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
5 - Protective Service: Non-sworn																
Total Workforce	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Involuntary Terminations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Number Retained	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Retention Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
6 - Administrative Support																
Total Workforce	5	7	-	3	-	-	4	1	1	2	-	1	-	-	-	-
Total Involuntary Terminations	1	-	-	-	-	-	1	-	-	-	-	-	-	-	-	-
Number Retained	4	7	-	3	-	-	3	1	1	2	-	1	-	-	-	-
Retention Rate	80.0%	100.0%	N/A	100.0%	N/A	N/A	75.0%	100.0%	100.0%	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A
Ratio to Highest Rate	80.0%	100.0%	N/A	100.0%	N/A	N/A	75.0%	100.0%	100.0%	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	Yes	No	N/A	No	N/A	N/A	Yes	No	No	No	N/A	No	N/A	N/A	N/A	N/A
7 - Skilled Craft																
Total Workforce	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Involuntary Terminations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Number Retained	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Retention Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
8 - Service & Maintenance																
Total Workforce	81	30	7	1	-	-	51	21	23	8	-	-	-	-	-	-
Total Involuntary Terminations	12	9	-	-	-	-	10	6	2	3	-	-	-	-	-	-
Number Retained	50	21	7	1	-	-	41	15	2	5	-	-	-	-	-	-
Retention Rate	61.7%	70.0%	100.0%	100.0%	N/A	N/A	80.4%	71.4%	8.7%	62.5%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	88.2%	100.0%	100.0%	N/A	N/A	N/A	80.4%	71.4%	8.7%	62.5%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	N/A	N/A	N/A	No	Yes	Yes	Yes	N/A	N/A	N/A	N/A	N/A	N/A

Notes:

Four-Fifths Adverse Impact Analysis by Job Category

[illegible]

Four-Fifths Adverse Impact Analysis by Job Category Training

Job Category (Use EEO-4)	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Total Trained	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Training Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
7 - Skilled Craft																
Total Workforce	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Trained	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Training Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
8 -Service & Maintenance																
Total Workforce	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Trained	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Training Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Notes: