

RESOLUTION NO. 2024-29

APPROVING THE GREATER CLEVELAND REGIONAL TRANSIT AUTHORITY'S  
2024-2027 QUADRENNIAL EQUAL EMPLOYMENT OPPORTUNITY PROGRAM  
AND AFFIRMATIVE ACTION GOALS

WHEREAS, Title 49 U.S.C. 5332(b) "Public Transportation" provides that no person in the United States shall, on the grounds of race, color, religion, national origin, sex, or age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any project, program or activity funded in whole or in part through federal financial assistance; and

WHEREAS, Federal Transit Administration ("FTA") Circular 4704.1A Equal Employment Opportunity ("EEO") provides guidelines and requirements for FTA grant recipients; and

WHEREAS, pursuant to the FTA's guidelines and requirements, the Authority, as a recipient of FTA funding, must submit an updated EEO Program to FTA every four (4) years or as major changes occur in the workforce or employment conditions, whichever comes first; and

WHEREAS, the FTA requires that the EEO Program include goals and timetables to correct identified areas of underutilization or concentration; and

WHEREAS, following FTA's directives, the Authority's EEO Program requires that the General Manager, Chief Executive Officer establish goals and review said goals on a quarterly basis for employing women and minorities; and

WHEREAS, in accordance with federal requirements, the General Manager, Chief Executive Officer met with management staff to determine the goals during the four-year period 2024-2027 for the employment of women and minorities; and

WHEREAS, said goals have been determined using the minimum criteria established in the federal regulations.

NOW, THEREFORE, BE IT RESOLVED by the Board of Trustees of the Greater Cleveland Regional Transit Authority, Cuyahoga County, Ohio:

Section 1. That the Quadrennial Equal Employment Opportunity Program and the affirmative action goals for the employment of women and minorities during the years 2024-2027, as set forth in Attachments A and B hereto and incorporated herein, are approved and adopted by the Authority's Board of Trustees.

Section 2. That this resolution shall become effective immediately upon its adoption.

Adopted: April 16, 2024

  
\_\_\_\_\_  
President

Attest:   
\_\_\_\_\_  
Secretary-Treasurer

**The Greater Cleveland Regional Transit Authority (GCRTA)**

# **Quadrennial Update of the Equal Employment Opportunity (EEO) Program 2024**

*This EEO Program is submitted to the Federal Transit Administration (FTA).*



**Greater Cleveland  
Regional Transit Authority**  
rideRTA.com

***Top U.S. Official:***

India L. Birdsong Terry,  
General Manager/CEO & Chief Civil Rights Officer

***EEO/AA Responsibility:***

Felicia Brooks Williams  
Senior Manager, Office of Equal Opportunity, ADA & DEI



### **Confidential Trade Secret Materials**

The material set forth in this program is deemed to be confidential commercial and financial data, the public disclosure of which could cause substantial competitive harm to Greater Cleveland Regional Transit Authority ("The Authority"). In addition, all statistical components of this program, including any and all data pertaining to employee compensation, workforce structure, final availability, goals and timetables, determinations of adverse impact and determinations of problems in workforce distribution and supporting employment policies and practices, or the analyses of any of the foregoing, are deemed to constitute trade secrets, operations information, confidential statistical data and other confidential commercial and financial data within the meaning of the Freedom of Information Act (FOIA), 5 U.S.C. §552 et. seq., Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. §2000d et. seq., the Trade Secrets Act, 18 U.S.C. §1905, and 44 U.S.C. §3508, the disclosure of which is prohibited by law and would subject the individual making the disclosure to criminal and/or civil sanctions. This material has not been disclosed to the public and should not be, since such disclosure could cause substantial competitive harm to The Authority. Therefore, in accordance with 29 C.F.R. §70.26(c) – (e), we expect that The Authority will be notified in writing by the agency prior to disclosure of any request for information pertaining to all or any part of this program, and that The Authority shall be given an opportunity to present its objection to disclosure.

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## **I. Introduction: FTA EEO Compliance Requirements**

This EEO Program is designed to satisfy The Authority's equal employment opportunity and affirmative action responsibilities under Title VII of the Civil Rights Act of 1964, as amended (42 U.S.C. § 2000e); Title VI of the Civil Rights Act of 1964, as amended (42 U.S.C. § 2000d); Equal Pay Act of 1963, as amended (29 U.S.C. § 206(d)); Age Discrimination in Employment Act of 1967, as amended (29 U.S.C. § 621 et seq.); Title II of the Genetic Information Nondiscrimination Act of 2008, as amended (42 U.S.C. § 2000ff); 49 U.S.C. § 5332(b) of the Federal Transit Act; U.S. Department of Transportation (DOT) EEO implementing regulations (49 CFR Part 21), and the FTA Master Agreement, Section 503 of the Rehabilitation Act of 1973, as amended (29 U.S.C. § 793); Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794); and the Uniformed Services Employment and Reemployment Rights Act of 1994 (38 U.S.C. §§ 4301–4335).

The Authority has prepared this EEO Program to cover all applicants and employees. As described in detail in the program that follows, The Authority has a continuing commitment to the practice and implemented action of this EEO Program.

## **II. The Greater Cleveland Regional Authority**

GCRTA has a strong commitment to the community we serve and our employees. As an equal opportunity employer, we strive to have a workforce culture of belonging, reflective of the community we serve. No person is unlawfully excluded from employment opportunities based on race, color, religion, national origin, sex (including gender identity, sexual orientation, and pregnancy), age, genetic information, disability, veteran status, or other protected class.

The GCRTA Equal Employment Opportunity (EEO) policy applies to all employment actions, including but not limited to, recruitment, hiring, selection for training, promotion, transfer, demotion, layoff, termination, rates of pay or other forms of compensation. All applicants and employees have the right to file complaints alleging discrimination. Retaliation against an individual who files a charge or complaint of discrimination, participates in an employment discrimination proceeding, (such as an investigation or lawsuit), or otherwise engages in protected activity, is strictly prohibited, and will not be tolerated.

We are committed to providing reasonable accommodations to applicants and employees who may be differently abled or to practice or observe their religion, absent undue hardship. All employees and customers have the right to request ADA accommodation or modification.

As the General Manager/CEO and Chief Civil Rights Officer, I maintain overall responsibility and accountability for GCRTA's compliance with its EEO Policy and Program. Felicia Brooks-Williams serves as the Senior Manager, Office of Equal Opportunity, ADA, and DEI, responsible for day-to-day management of the EEO, ADA and DEI Programs, including program preparation, monitoring, ADA accommodations and complaint investigations.

All executives, management, and supervisory personnel, however, share the responsibility for implementing and monitoring GCRTA's EEO Policy and Programs within their respective areas and will be assigned specific tasks to ensure compliance is achieved. GCRTA will evaluate its managers' and supervisors' performance on their successful implementation of GCRTA's policies and procedures, in the same way GCRTA assesses their performance regarding other agency's goals.

We are committed to our written nondiscrimination program that sets forth the policies, practices, and procedures, with goals and timetables, to which the agency is committed and make the EEO Program available for inspection by any employee or applicant for employment upon request.

As the General Manager, Chief Executive Officer, and Chief Civil Rights Officer, I am personally committed to a workplace that fulfills on a daily basis its responsibility to treat all applicants and employees with dignity and respect, as well as equitably under the guidelines of our EEO Policy and Programs.

I fully support The Authority's equal opportunity and affirmative action policies.

---

India L. Birdsong Terry  
General Manager, CEO and  
Chief Civil Rights Officer

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Date



### **III. Dissemination of Policy**

The Authority ensures applicants are aware of its equal employment program by posting its EEO policies and program in public and common areas within the workforce such as at entrance doors and interview rooms where possible. These elements of The Authority's EEO program are made available to our employees by publishing content on bulletin boards in break rooms and in our Employee Handbook.

#### **A. Internal Dissemination**

- India Birdsong Terry, GM/CEO & Civil Rights Officer, sent written communication to all managers and supervisors to inform them of EEO policy.
- Official EEO materials, such as Federal and state required labor law posters are prominently displayed in community areas within the facility, so all employees can view The Authority's EEO program and expectations.
- The EEO Program and policy is published in the employee handbook for all current employees to read.
- The Authority holds a semi-annual meeting with managers and supervisors to discuss the EEO Program and its implementation. New managers and supervisors are trained within (90) days of hire or appointment.
- The Authority shares its EEO Program and Policies with its Diversity, Equity, and Inclusion Team members to obtain input from various Employee Resource Groups for program implementation and effectiveness.
- Non-supervisory staff is informed of the EEO policy through new employee orientation, periodic training, and publicly displayed EEO posters and policy statements.

#### **B. External Dissemination**

- All recruitment sources will continue to be used to inform people of GCRTA's Equal Employment Opportunity Policy.
- All advertisements of job openings and all announcements of upcoming examinations will continue to include the phrase, "An Equal Opportunity/ADA Employer."
- The Authority will continue advertise that it is an "Equal Opportunity Employer" in all public media sources, especially radio and television stations, newspapers, magazines, and other journals, making an extra effort to inform those sources that are specifically oriented to minorities and females.

#### **IV. Designation of Personnel Responsibility**

Pursuant to the requirements under FTA C 4704.1A, overall responsibility for implementation of the EEO Program lies with the General Manager/CEO & Civil Rights Officer and the Senior Manager of the Office of Equal Opportunity. The Senior Manager of the Office of Equal Opportunity, ADA, & DEI, has the authority, resources, support of and access to top management to ensure effective implementation of the EEO Program. Felicia Brooks-Williams, Senior Manager of the Office of Equal Opportunity is identified in all internal and external communications regarding The Authority's EEO policy. It is The Authority's objective to ensure full adherence to its EEO policy and to the program.

These positions responsibilities include, but are not limited to:

##### **CEO, General Manager and Chief Civil Rights Officer**

The General Manager/CEO has the overall responsibility for overseeing the implementation of the Affirmative Action/ EEO Program. The General Manager serves as the Civil Rights Officer and delegates the day-to-day responsibility to the Senior Manager of the Office of Equal Opportunity.

##### **Senior Manager of the Office of Equal Opportunity**

- Developing and recommending policy statements, EEO Program and both internal and external communication programs (i.e., to include leading the charge on ensuring EEO posters are properly displayed in conspicuous work areas).
- Ensuring consistency and completeness of The Authority's EEO Program with federal, state, and local agencies' rules and regulations.
- At a minimum, biannually meeting with and discussions of the problem areas and progress of each unit's goal progress with Key Leaders including the CEO.
- Assisting officials and managers with collecting and analyzing employment data, monitoring internal audit, and reporting systems to identifying problem areas and setting goals to address underutilization of minorities, females and individuals who have disabilities.
- Collaboratively working with HR Business Partners and Talent Acquisition team members to discuss where goal progress has been achieved and recommendations for proactive sourcing in areas where goals remain.
- Providing periodic training and feedback to officials and managers based on their EEO progress.
- Designing, implementing, and monitoring internal audit and reporting systems to measure program effectiveness and measuring where progress has been made and where proactive action is needed.
- Serving as liaison between The Authority and Federal, state, county, local governments, regulatory agencies, and community organizations that serve minorities, women, and persons with disabilities.
- Assuring current legal information affecting equal opportunity employment is disseminated to appropriate personnel.
- Concurring on all hires and promotions.



- Processing employment discrimination complaints.
- Assisting in recruiting minority, handicapped and female applicants and establishing outreach sources for use by hiring officials.
- Reviewing the agency's nondiscrimination plan with all managers, supervisors, and The Authority's affinity group members focused on EEO ensuring diversity, equity and inclusion are at the core of all people related processes.
- In partnership with Human Resources, periodically reviewing employment practices, policies, complaint policies, reasonable accommodation policies, performance evaluations grievance processes and union agreements.
- In conjunction with human resources, advising employees and applicants of available training programs and professional development opportunities and the entrance requirements.
- Auditing postings of the EEO policy statements to ensure compliance information is posted and up to date.

The Office of Equal Opportunity (OEO) Program Administrator also assists the Senior Manager with the day-to-day responsibilities of the implementation of the EEO Program.

In addition, the following entities assist with the direct application of the Authority's EEO Program:

**Deputy General Manager for Administration and External Affairs;** A member of the Executive Management Team reporting directly to the General Manager/CEO and Chief Civil Rights Officer. The Senior Manager of OEO, ADA & DEI is a direct report to the Deputy General Manager of Administration and External Affairs. This Deputy General Manager oversees Diversity, Equity, Inclusion and Belonging (DEI &B). The Administration and External Affairs Division consists of OEO, Marketing, Government, Affairs, Community Engagement, Mobility Management, Media Relations, and Customer Service.

**Deputy General Manager for Legal Affairs:** A member of the Executive Management Team reporting directly to the General Manager/CEO and Chief Civil Rights Officer. The Deputy General Manager oversees the Legal Affairs Division and supports the Office of Equal Opportunity. The Legal Affairs Division is comprised of the Legal, Safety and Risk Management Departments.

**Deputy General Counsel and Associate Legal Counsel, in Administrative & Labor Law:** Investigate external charges of harassment and discrimination from employees and customers, including the interviewing of all relevant witnesses, gathering, and analyzing data and materials, and making recommendations for corrective action, where appropriate.

**Director, Business Development:** Under the direction of the Deputy General Manager, Finance & Administration, the Director of Business Development is responsible for the functioning and coordination of the Small Business/Disadvantaged Business Enterprises (DBE) Program. This program creates and monitors the neutral and race-conscious goals set on outstanding contracts, grants, and procurement projects, and works with the DBE community to help the Authority achieve those goals.



**Managers, Employment & Recruitment:** The Authority's Human Resources Department is charged with the functional day-to-day administrative responsibility of ensuring that the AAP is complied with. More specifically, the Managers of Employment & Recruitment, under the direction of the Deputy General Manager, Human Resources, ensures that equal opportunity is afforded to all current and prospective employees regarding recruitment, appointment, compensation, promotion, and benefits. The Human Resources Department provides reports, statistics, and other relevant information to the Office of Equal Opportunity to ensure that the program goals are being met and can be reported to the Affirmative Action/Equal Opportunity committee.

**Affirmative Action/Equal Opportunity Committee:** The Equal Opportunity Committee is appointed by the General Manager/CEO and consists of the General Manager/CEO; the Deputy General Manager, Legal Affairs; the Director of Business Development; the Director of Employment & Recruitment; the Senior Manager of the Office of Equal Opportunity; and other personnel deemed appropriate by the General Manager/CEO. The Senior Manager of the Office of Equal Opportunity is responsible for setting the agenda for this meeting and maintaining a record of all the proceedings of the meetings. The Committee meets no less than semi-annually.

**Directors/Managers/Supervisors;** All supervisory personnel share the responsibility for ensuring the effectiveness of the Authority's EEO Program. They are expected to give their full cooperation and active support to the EEO Program.

Among the specific requirements of the administrative and supervisory personnel are to:

- Lead by example and encourage all employees to be proactive in reporting any suspicious or concerning behavior towards a fellow team member.
- Assist Human Resources with identifying problem areas and establishing goal objectives.
- Be actively involved with local minority organizations, female and disabled groups, community action organizations and community service programs designed to promote equal employment opportunity.
- Participate actively in periodic audits of all aspects of employment to identify and remove barriers obstructing the achievement of specified goals and objectives.
- Hold regular discussions with other managers, supervisors, and employees to identify and remove barriers obstructing the achievement of specified goals.
- Review the qualifications of all employees to ensure there are no barriers to positive employment outcomes such as selection for transfer, promotion, and training.
- Support career counseling for employees and provide professional leadership development programs to diverse high potential employees.
- In conjunction with Human Resources, participate in periodic audits to ensure that each location is following the EEO Program as well as federal, state, and local agencies' rules and regulations (i.e., ensure that all EEO posters are properly displayed on all employee bulletin boards).
- In conjunction with the EEO officer, maintain and update the personnel

- database for generating reports required for the nondiscrimination program.
- Cooperate with the EEO officer in review of information and investigation of complaints.

## V. Utilization Analysis

Pursuant to the requirements under FTA C 4704.1A, The Authority has completed a utilization analysis as part of the EEO Program. The purpose of the utilization analysis is to identify EEO-4 categories that have an underutilization or concentration of minorities and women compared to their respective 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. The Authority has used the Utilization Analysis Excel Chart provided by the FTA to complete the Utilization Analysis element of the EEO Program. The elements of the utilization analysis are listed below.

The Utilization Analysis is included in the submission as Appendix A.

### A. Workforce Analysis

The Authority completed a Workforce Analysis within the Utilization Analysis to depict the staffing pattern within an establishment. The workforce analysis lists the number of employees and salary ranges for each EEO-4 job category 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)

### B. Availability Analysis

The purpose of the availability analysis is to establish a benchmark against which the demographic composition of The Authority's incumbent workforce can be compared to determine whether barriers to equal employment opportunity may exist within the EEO-4 job categories. The Authority determined the availability of minorities and women in each EEO-4 category using availability data in the American Community Survey (ACS) database. The Authority executed the following steps to appropriately report the availability of men and women and the racial/ethnic subgroups within the utilization analysis:

- (1) The Authority determined the relevant labor market used for the EEO-4 categories of each establishment. The Authority determined the most appropriate regional, national, or local recruiting area available



in the ACS database to align this recruitment area to how The Authority recruits at each establishment in practice. The reasonable recruitment areas identified for each job category are as follows:

- 1 - Officials & Administrators - US (50%); OH (50%)
  - 2 - Professional - Cuyahoga County, OH (80%); Geauga County, OH (3.34%); Lake County, OH (3.34%); Lorain County, OH (3.33%); Medina County, OH (3.33%); Summit County, OH (3.33%); Portage County, OH (3.33%)
  - 3 - Technicians - Cuyahoga County, OH (80%); Geauga County, OH (3.34%); Lake County, OH (3.34%); Lorain County, OH (3.33%); Medina County, OH (3.33%); Summit County, OH (3.33%); Portage County, OH (3.33%)
  - 4 - Protective Service - Cuyahoga County, OH (80%); Geauga County, OH (3.34%); Lake County, OH (3.34%); Lorain County, OH (3.33%); Medina County, OH (3.33%); Summit County, OH (3.33%); Portage County, OH (3.33%)
  - 5 - Administrative Support - Cuyahoga County, OH (80%); Geauga County, OH (3.34%); Lake County, OH (3.34%); Lorain County, OH (3.33%); Medina County, OH (3.33%); Summit County, OH (3.33%); Portage County, OH (3.33%)
  - 6 - Skilled Craft Workers - Cuyahoga County, OH (80%); Geauga County, OH (3.34%); Lake County, OH (3.34%); Lorain County, OH (3.33%); Medina County, OH (3.33%); Summit County, OH (3.33%); Portage County, OH (3.33%)
  - 7 - Service/Maintenance - Cuyahoga County, OH (80%); Geauga County, OH (3.34%); Lake County, OH (3.34%); Lorain County, OH (3.33%); Medina County, OH (3.33%); Summit County, OH (3.33%); Portage County, OH (3.33%)
- (2) The Authority calculated the availability of men and women and the racial/ethnic subgroups using the determined recruitment areas and availability data in the ACS.
- (3) The Authority input the availability data into the utilization analysis.

### C. Goals and Timetables

The utilization analysis chart identifies whether The Authority's job categories are underutilized for men, women, and/or the racial/ethnic subgroups. Using the Whole Person methodology in the Utilization Analysis, if certain EEO-4 job categories are found to be underutilized in one or more areas. The Authority will establish a placement goal. In conjunction with a set numerical and percentage placement goal, The Authority determines timetables for the next four-year period, which details the improved utilization in areas that were identified as underutilized.



Per the recommendations, The Authority has involved relevant stakeholders in developing placement goals and timetables that are both short term and long-term in nature. The short-term goals represent the aspirational increase in utilization of women and minorities by EEO-4 category in the next year. In creating short-term goals, the Authority has considered variables (e.g., job openings) that may impact The Authority's ability to improve employment practices and reach the short-term goals. Long-term goals are set to look ahead two years or more and reflect the aspirational increase in utilization of women and minorities over the 4-year duration of the EEOP. These goals are set in consideration of current and projected availability of the identified underutilized groups, as well as opportunities to hire employees due to company revenue and operating funds.

A 2024-2027 Goal Summary is provided in the submission as Appendix B.

D. Placement Goal Progress from Previous EEOP Submission

In accordance with FTA requirements, The Authority has engaged in a review of previous program submission and evaluated areas in which goals were not reached. The Authority is committed to gaining a comprehensive understanding of any circumstances surrounding goal non-attainment and develop measures for corrective action based on the results of the utilization analysis and employment practices chart.

Primarily due to the COVID-19 Pandemic, as with many employers, the Talent Acquisition (TA) team faced cultural challenges in finding and attracting talent. The impact of the pandemic forced human resources to think outside of the box and recruit passive and aggressive candidates by being proactive rather than reactive. It changed the old onboarding process from a transaction to a human design to focus on the applicants and their experience(s).

Marketing campaigns were designed to attract passive job seekers through non-traditional partnerships. The process included collaboration and participation with Workforce Development & Community opportunities to include:

- Government (City, County & State) partnerships
- Veterans Service Organizations
- Non-Profits (Community Engagement)
- Education (Community Colleges & Training Institutions)

A copy of the goals and timetables from the previous EEOP is included in the submission as Appendix C.

## VI. Assessment of Employment Practices

The Employment and Recruitment Department is committed to upholding GCRTA's affirmative action standards and process. To that end, the Employment and Recruitment Department and OEO work collaboratively to ensure that the recruiting,

selection and offer process is conducted with affirmative action goals in mind. The following outlined process ensures appropriate checks in the major steps of the process while remaining service-oriented to our customers in recruiting and hiring individuals for vacant positions in the most efficient manner possible. The Employment Practices Chart is included in the submission as Appendix D.

#### **A. Recruitment**

Personnel recruitment activities are carried out primarily in accordance with The Authority's Personnel Policies and Procedures Manual (Manual) as adopted by the Board of Trustees. The provisions of the Manual are applied equally throughout The Authority, thus eliminating opportunities for disparate treatment.

To access the largest possible applicant pool, positions may be advertised in local, state, and/or national general circulation newspapers and websites. Job announcements may be distributed to various local employment, professional, academic, ethnic, social, and governmental agencies. A list of organizations/institutions with which The Authority has formed relationships to recruit potentially qualified applicants is included in the submission as Appendix E.

All job announcements are posted online through the iRecruitment system. Active employees access this system through Employee Self Service at the [www.myinfo.gcrta.org](http://www.myinfo.gcrta.org) site, may apply for any position for which they qualify, and must compete with all other candidates.

For non-bargaining positions, the Employment and Recruitment Department shall first screen online applications/resumes to identify those that meet the minimum qualifications. Qualified applicants will advance to the next step of the selection process and will continue to advance in the selection process until they are no longer eligible to advance.

Written tests that are administered by The Authority include standardized psychological, aptitude, and skills tests purchased from external sources, and specific job-related examinations developed by staff from the Human Resources Department.

Members of The Authority's staff (in the form of panels) interview all applicants who are being considered for positions within the Authority. Furthermore, the appropriate supervisory or management personnel may also interview those persons who have applied for highly skilled jobs or administrative positions.

The Authority may administer various assessments to qualified candidates for both initial hires and promotions including, but not limited to, a physical examination, drug and alcohol screening, police records, driving records, background check, employment history, and interviews to assist in making a final decision. All applicants are notified of the decision regarding their applications, internal transfers, or promotions.



**B. Employment Policies and Practices**

In addition to the Manual, employees are governed by a variety of other rules, codes, and policies. One such set of rules is that only ATU represented employees are governed by the Merit System Rules. These Rules cover a variety of topics for employees, such as pay rates and scales, examinations, promotions, appointments, demotions, resignations, layoffs and retirement, and discharges and suspensions.

Other employment policies which affect all employees are the Employee Performance Code, Positive Discipline Program, Attendance Policy, Program Guidelines for Voluntary Furlough, Substance Abuse Policy for Non-Safety Sensitive Employees, and Substance Abuse Policy for Safety Sensitive Employees. The policies not only assist employees in understanding what type of behavior is and is not acceptable, but help contribute to a work environment that fosters equal employment opportunity and affirmative action. The Employee Performance Code makes it clear that the use of racial or ethnic slurs or offensive remarks will not be tolerated. Moreover, the Positive Discipline Policy requires that supervisors get permission before issuing the final stage of formal discipline, thereby minimizing the possibility of disparate or discriminatory treatment by supervisors towards employees.

Included in the Manual is the Authority's Equal Employment Opportunity policies, including Sexual Harassment/Non-Harassment & Retaliation, Americans with Disabilities Act Amendment Act - ADAAA of 2008, and the Family Medical Leave Act. These policies assist employees in understanding what type of behavior is expected of them while in the course and scope of their employment and the avenues available to assist them with issues. Further, these sections clearly set forth the law regarding unlawful and/or discriminatory conduct, assist employees on how to report these matters, and explain the investigation process.

**C. Compensation**

A salary schedule has been established for all non-represented positions in grades 101 through 116. It consists of pay ranges, each with a minimum and maximum rate of pay.

Job descriptions have been prepared and assigned grades, classification numbers, and titles.

Department directors and supervisors shall conduct annual performance appraisals of employees that may result in salary increases in accordance with guidelines of the merit pay plan.

**D. Promotions**

Any employee who meets the minimum requirements for the position and who has successfully completed their probationary/ orientation period may compete for a promotional position. Employees learn of promotional opportunities through internal postings located on the iRecruitment computerized system.



Employees in Grades 1-6, whose job classifications are governed by testing and with an eligible list, are also able to apply for promotional positions. The promotional process for these employees is governed by collective bargaining agreement, the Merit System Rules and various arbitration decisions and Memorandums of Understanding with the ATU, Local 268.

#### **E. Americans with Disabilities Act**

The Authority is committed to providing equal opportunity in employment, training, benefits, compensation, and promotions. This includes providing a work environment free from unfair and unequal treatment based on an employee's or applicant's disability status and providing reasonable accommodations to qualified individuals with disabilities to perform the essential functions of their jobs. Employees may contact the Office of Equal Opportunity to begin the interactive discussion of assessing the job requirements and their needs so that a reasonable accommodation(s) can be made available for the employee.

#### **F. Veterans**

Pursuant to the requirements of FTA C 4704.1A, The Authority is reaffirming its commitment to affirmative action and equal employment opportunity for all its applicants and employees. Specifically, The Authority does not discriminate because of an individual's status as a protected veteran, and takes affirmative action to employ and advance in employment qualified protected veterans at all levels of employment, including the executive level.

### **VII. Action-Oriented Programs**

The following programs are viable options for addressing the identified deficiency at The Authority of underutilization of women or minorities in each job category. GCRTA is committed to putting forth its best efforts in these action-oriented programs to reach its established goals and edge closer toward parity with established availability in all job classifications. Furthermore, while these enumerated programs will help The Authority move closer to its goals, The Authority is ever open to new and alternative ideas for achieving its established goals. The Employment Practices Chart is included in the submission as Appendix D.

#### **A. Recruitment**

Recruitment is the primary way in which affirmative action goals can be met. More specifically, effective recruitment will increase the number of people in protected classes who are available to fill vacancies.

The Authority continues to expand its recruitment efforts to maximize opportunities to receive applications from qualified minorities, women, and other members of protected classes for positions. In order to access the largest possible applicant pool of minorities, women, and other members of protected classes, positions are advertised in local, state, and/or national general circulation newspapers and websites. Job announcements are

distributed to various local employment, professional, academic, ethnic, social and governmental agencies. The primary responsibility for these efforts lies with the Human Resources Department and is subject to review by the Deputy General Manager, Human Resources.

The Authority's recruitment efforts include, but are not limited to:

- Continued outreach and active support of local community action programs and services designed to improve employment opportunities for minorities and women. Additionally, we continue to improve our outreach and connecting with the community through job fairs, email blasts, and advertising job announcements in Hispanic publications and media. All applicants can attend our recruiting events. All event information is posted on the [riderta.com/careers](http://riderta.com/careers).
- The use of affirmative action measures, such as job fairs, to recruit minorities and women not currently in the work force and having the requisite skills.
- Notices of vacancies and job opportunities with The Authority are routinely sent to the recruitment sources. The recruitment sources consist of hiring agencies, and list community partners list developed specifically to increase the applicant pool of minorities, women, and other members of the protected classes, and is updated on an on-going basis.
- All job announcements are reviewed and revised to ensure that job duties and minimum requirements are job-related, and do not adversely impact minorities, women, and other members of the protected classes.
- Personnel are encouraged to participate in job fairs, information sessions, and career day programs at local high schools, colleges, and universities.

The Authority's recruitment efforts will continue to be done on an on-going basis. Any and all recommendations designed to enhance the likelihood of improving or achieving these efforts, and ultimately The Authority's affirmative action goals, are welcomed and considered.

## **B. Employee Advancement**

Employees are encouraged to compete for promotions and take advantage of educational and training opportunities. This is of particular interest to women and minorities who may be in entry-level positions or traditional positions with lower pay rates who seek opportunities for advancement.

The Authority will continue to post and promote promotional opportunities for all employees, assuring that postings are readily available and timely placed within all buildings and facilities. Furthermore, The Authority believes that on-going employee development is an important organizational objective and provides direct benefits for the development of internal future organizational leaders. The Authority will continue to



encourage employees to take advantage of the following programs, to increase both skills and knowledge:

- The Succession Planning Program was developed to ensure effective organizational performance by preparing qualified high potential individuals to compete for key roles. The program has 3 goals: achieve strategic alignment, build bench strength and preserve institutional knowledge. Individuals selected to participate in the program will receive individual development plans geared toward preparing them to compete for future key openings.
- Public Management Academy and Leadership Academy is a partnership endeavor with Cleveland State University's Levin College of Public Administration, which focuses on developing employees' skills and to enhance succession planning efforts.
- Public Transit Development Academy (PTDA). The PTDA provides cross-functional expertise development through rotational assignments throughout all divisions. Career development includes the enhancement of new skill sets and provides a pipeline of new leaders for the GCRTA. Individuals are selected from multi-cultural universities and through internal promotional opportunities.
- The Tuition Reimbursement Program (TRP) provides financial means for employees to expand their knowledge, skills, and abilities through college/academic degree programs.
- Other opportunities include external training programs, which focus on the development of improved or new skill sets.

Individuals who participate in the above opportunities gain personally and professionally. These opportunities represent The Authority's bold commitment to help its employees strive for excellence. The following are promotional opportunities afforded to:

- Service Maintenance employees (Bus and Rail Operators, Laborers, Hostlers, and Janitors)
- Service Quality Supervisors/Coordinators
- District Director
- Service Management Schedulers
- Telephone Information Operators
- Transportation Managers
- Customer Service Operators
- Trainers
- Dispatchers
- Claims Manager
- Accounting and Payroll Clerks

The Human Resources Department is responsible for the thorough and timely posting of promotional opportunities via the iRecruitment system. Moreover, the Division of Training & Employee Development is responsible for sponsoring and organizing internal and external educational and training



opportunities and promoting the Tuition Reimbursement Program, available to all employees.

The Authority's efforts toward notifying employees of promotional opportunities, and increasing employees' skills and education are done on an on-going basis. The dates of specific training classes are disseminated in advance, so employees will have ample opportunity to enroll.

### **C. EEO-Related Training**

In accordance with continual changes in federal and state regulations, and case law, it is necessary for The Authority to provide annual training to its supervisory and management staff. In addition, new employees must be aware of the equal employment opportunity and affirmative action policies and the expectations for their behavior based on these policies. The Office of Equal Opportunity will continue to provide training to all new employees through the new employee orientation process held a minimum of once a month throughout the year.

The Office of Equal Opportunity, Legal and Human Resources Division will also conduct training for supervisory and management staff. This training will offer a refresher on equal employment and a review of the EEO Program, as well as updates on federal or state regulations, law, and relevant internal policies. The Office of Equal Opportunity will provide additional training on an as needed basis and/or in response to changes in regulations, court decisions, and when requested by a department or division.

### **D. Diversity Initiative**

The Senior Manager of OEO, ADA, DEI&B also has oversight of the Diversity, Equity, Inclusion and Belonging (DEI &B) Program. The DEI Administrator is under the direction of the Senior Manager of OEO. The DEI Administrator runs the following DEI &B programming:

- Employee Resource Groups (ERGs): voluntary, employee-led groups whose aim is to foster a diverse, inclusive workplace aligned with the organizations they serve. The Authority currently has four ERGs:
  - Elevating Women Together (EWT): to provide resources, mentoring and networking connections that support, enrich, and inspire women to advance professionally and personally.
  - Pride: to provide a safe, welcoming, and enriching environment for members and allies of the LGBTQIA+ community.
  - Latinos Unidos: to create a sense of belonging and enhance the Hispanic/Latino employees through networking, mentoring opportunities, and professional and personal growth.
  - Veterans: to embrace and create a forum for veteran employees and allies, who will support and encourage each other through mentoring, career development, outward engagement, professional growth, and retention.
- DEI Learning Series: Consists of the following classes for all employees:
  - DEI +B 101

- Unconscious Bias
- Microaggressions
- Privilege
- Allyship
- Generational Diversity
- Neurodiversity
- LGBTQ+ 101

## **VIII. Monitoring and Reporting Systems**

The Office of Equal Opportunity continuously monitors information regarding various personnel activities and their impact on both equal employment opportunity and affirmative action. Specifically, The Authority's Office of Equal Opportunity collects data on recruitment efforts, applicant flow, transfers, promotions, disciplinary actions, terminations, and participation in training programs.

This information, together with other data collected, is used by the Office of Equal Opportunity to prepare a quarterly report for the Board of Trustees and General Manager/ CEO and Chief Civil Rights Officer. The report includes detailed information on the progress made toward attainment of goals, problems identified, and recommendations for modifications in personnel practices and/or AAP. The entire AAP is reviewed annually with necessary revisions being made at that time. Supervisors may recommend modifications in the AAP.

The Office of Equal Opportunity also ensures that recordkeeping systems provide the required information to government regulatory agencies and the compilation and timely submission of reports required by such agencies. The Office of Equal Opportunity maintains an EEO log and weekly report to track EEO complaints. Each complainant is assigned a case number and folder. The EEO log sheet includes the name of complainants and respondents, allegations, date complaint received and disposition of complaint.

Quarterly, the Office of Equal Opportunity reviews the EEO Program's quantitative and qualitative effectiveness of the Authority's outreach efforts to address areas where the candidate pool may be deficient of qualified female, minorities, veterans, and applicants with disabilities and advise talent acquisition teams to conduct additional outreach to community-based organizations focusing on employment of these classes of individuals.

Semi-annually the Senior Manager and OEO Program Administrator meet with the CEO and other members of management responsible for making employee-related decisions, to review EEO regulations, The Authority's EEO Program, and restate its commitment to affirmative action. The analysis and monitoring of progress is discussed during these meetings. Documentation of these meetings is maintained stating topics covered, and follow-up action items.

The Senior Manager's meetings with HR and hiring officials help to review the problem areas of under-representation and the statistical analyses on the employment practices. The Senior Manager reviews EEO regulations, The Authority's EEO Program, and restates its commitment to affirmative action. In addition, the Senior Manager ensures processes are in place to review the stated

requirements of the position and ensure that these are job-related.

The Authority presents Appendix F, demonstrating the Leadership of the organization showing the reporting relationships of all directors, department heads and executives, including names and titles.

The monitoring and reporting process, specifically includes identifying and deploying data collection and reporting tools that will:

- Detect areas and degrees of underrepresentation and underutilization, and other disparities in all selection processes and indicate the need for remedial action.
- Determine the degree to which the goals and objectives of affirmative action plans are being met; and
- Measure the effectiveness of The Authority's recruitment efforts.
- Summarize statistical data and other relevant information to identify underrepresentation and underutilization, and other problem areas.
- The Authority will modify these action-oriented programs as needed using available regional labor market data and collected local data to remove identified barriers, expand employment opportunities, and produce measurable results.



## IX. Complaint Procedure

The Authority has established the following procedure for filing a complaint of harassment, discrimination, or retaliation. Any complaints can be directed to Felicia Brooks Williams, Senior Manager Office of Equal Opportunity, by email at [fbwilliams@gcrta.org](mailto:fbwilliams@gcrta.org) or by phone at (216) 356-3094; or Albert Johnson, OEO/ADA Program Administrator, by email at [albert.johnson@gcrta.org](mailto:albert.johnson@gcrta.org) or phone at (216) 356-3038. The Authority treats all aspects of the procedure confidentially to the extent reasonably possible.

In the processing of a complaint, the Senior Manager of the Office of Equal Opportunity or his/her representative will:

- Maintain the confidentiality of the complainant to the extent permitted under the law.
- Analyze the allegations of discrimination to identify conditions or circumstances that may exist beyond the individual case that require further investigation.
- Ensure that the complainant is aware of his/her rights at all stages of the complaint process.
- Make necessary inquiries to seek a resolution of the matter.
- Have access to officials at all levels.
- Discuss with the appropriate official(s) the findings and his/her recommendations regarding the complaint and make periodic checks as necessary to assure that any agreed upon corrective action has been taken or is continuing.
- Process the complaint within a reasonable amount of time after the matter is brought to his/her attention.

The Senior Manager of the Office of Equal Opportunity is responsible for implementing the complaint procedure. Management and supervisory personnel will provide the Senior Manager of the Office of Equal Opportunity, or her representative, with complete cooperation in investigating and resolving these formal EEO complaints.

If the complaint brought by the employee does not allege discrimination based on race, color, religion, sex, national origin or ancestry, age, disability or status as a Vietnam era veteran, the employee may be referred to the appropriate grievance procedure as provided in an applicable collective bargaining agreement or as provided in the Manual. Furthermore, the Office of Equal Opportunity has implemented a formal in-house mediation program to handle employee disputes arising out of the course and scope of their employment.

## **X. Subrecipients and Services**

The Greater Cleveland Regional Transit Authority (GCRTA) contractors that are monitored provide transit related services. These contractors provide ADA Paratransit service. ADA Paratransit service is shared-ride, door-to-door transportation that is provided to people with disabilities who are unable, or have limited ability because of their disability, to use fixed-route buses or trains.

The Contractors consist of the following:

Provide-A-Ride  
Senior Transportation Connection  
GC Logistics

Upon renewal of their contract, May 17, 2023, each of the contractors were informed of their requirements in accordance with FTA Circular 4704.1A. In addition, on October 5, 2023, an EEO Compliance meeting was conducted with the contractors.

Appendix G demonstrates that The Authority informed the contractors of their obligations of compliance under FTA Circular 4704.1A and shows an excerpt from the EEOP received from each respective contractor.



XI. Appendices

Appendix A - Utilization Analysis Chart

Job Category Use EEO-4	Salary Range (\$XX,000-XX,000)	Total Workforce					Male								Female							
		All	WM	MM	WF	MF	W	AI/AN	B	H/L	A	NHOPI	Multi	W	AI/AN	B	H/L	A	NHOPI	Multi		
<b>1 - Officials &amp; Administrators</b>																						
Current Workforce	\$88,000 - \$335,000	33	13	7	8	5	13		5	1	1	-	-	8	-	5	-	-	-	-		
Percent in Category	*Entry		39.4%	21.2%	24.2%	15.2%	39.4%	0.0%	15.2%	3.0%	0.0%	0.0%	0.0%	24.2%	0.0%	15.2%	0.0%	0.0%	0.0%	0.0%		
Percent of Availability							47.4%	0.1%	3.3%	3.5%	2.5%	0.0%	0.8%	32.7%	0.1%	4.2%	2.7%	1.8%	0.0%	0.7%		
Percent Underutilized																						
Underutilized (Yes/No)							No	No	No	No	No	No	Yes	8%	No	No	No	No	No	No		
Number Needed to Reach Parity													2									
Planned percent increase Year 1													2%									
Planned percent increase Year 2													2%									
Planned percent increase Year 3													2%									
Planned percent increase Year 4													2%									
<b>2 - Professionals</b>																						
Current Workforce	\$31,000 - \$146,000	212	81	49	36	46	81	-	40	5	3	-	1	36	-	40	2	3	-	1		
Percent in Category	*Entry		38.2%	23.1%	17.0%	21.7%	38.2%	0.0%	18.9%	2.4%	1.4%	0.0%	0.5%	17.0%	0.0%	18.9%	0.9%	1.4%	0.0%	0.5%		
Percent of Availability							34.3%	0.0%	3.8%	1.2%	3.2%	0.0%	0.7%	43.0%	0.1%	8.8%	1.8%	2.3%	0.0%	0.9%		
Percent Underutilized																						
Underutilized (Yes/No)							No	No	No	Yes	No	No	Yes	26%	No	No	Yes	1%	1%	No		
Number Needed to Reach Parity													3	55			1	1				
Planned percent increase Year 1													1%				1%	1%				
Planned percent increase Year 2													1%									
Planned percent increase Year 3													5%									
Planned percent increase Year 4													5%									
<b>3 - Technicians</b>																						
Current Workforce	\$80,000 - \$103,000	81	39	27	0	15	39	-	14	3	2	-	8	-	-	14	-	1	-	-		
Percent in Category	*Entry		48.1%	33.3%		18.5%	48.1%	0.0%	17.3%	3.7%	2.5%	0.0%	9.9%	0.0%	0.0%	17.3%	0.0%	1.2%	0.0%	0.0%		
Percent of Availability							35.7%	0.0%	12.8%	4.0%	1.7%	0.0%	0.8%	25.3%	0.1%	14.1%	3.3%	1.3%	0.0%	0.7%		
Percent Underutilized																						
Underutilized (Yes/No)							No	No	No	No	No	No	Yes	25%	No	No	Yes	3%	0%	No		
Number Needed to Reach Parity													20				2			No		
Planned percent increase Year 1													5%									
Planned percent increase Year 2													5%				1%					
Planned percent increase Year 3													5%				1%					
Planned percent increase Year 4													5%				1%					
<b>4 - Protective Service</b>																						
Current Workforce	\$42,000 - \$82,000	96	53	19	5	19	53	-	10	8	-	-	1	5	-	18	1	-	-	-		
Percent in Category	*Entry		55.2%	19.8%	5.2%	19.8%	55.2%	0.0%	10.4%	8.3%	0.0%	0.0%	1.0%	5.2%	0.0%	18.8%	1.0%	0.0%	0.0%	0.0%		
Percent of Availability							53.1%	0.2%	19.8%	4.7%	0.5%	0.0%	1.6%	7.7%	0.0%	11.2%	0.4%	0.0%	0.0%	0.9%		
Percent Underutilized																						
Underutilized (Yes/No)							No	Yes	No	No	No	No	Yes	3%	No	No	No	No	No	No		
Number Needed to Reach Parity													8	2								
Planned percent increase Year 1													2%									
Planned percent increase Year 2													2%									
Planned percent increase Year 3													2%									
Planned percent increase Year 4													2%									
<b>5 - Paraprofessional</b>																						
Current Workforce		0	0	0	0	0																
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%		
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%		
Percent Underutilized																						
Underutilized (Yes/No)							No	No	No	No	No	No	No	No	No	No	No	No	No	No		
Number Needed to Reach Parity																						
Planned percent increase Year 1																						
Planned percent increase Year 2																						
Planned percent increase Year 3																						
Planned percent increase Year 4																						
<b>6 - Administrative Support</b>																						
Current Workforce	\$38,000 - \$93,000	131	9	33	13	76	9	-	31	2	-	-	-	13	1	89	4	-	-	2		
Percent in Category	*Entry		8.9%	25.2%	9.9%	58.0%	6.9%	0.0%	23.7%	1.5%	0.0%	0.0%	0.0%	9.9%	0.8%	52.7%	3.1%	0.0%	0.0%	1.5%		
Percent of Availability							25.3%	0.0%	6.6%	1.5%	0.7%	0.0%	0.5%	44.3%	0.1%	16.3%	2.5%	0.9%	0.0%	1.1%		
Percent Underutilized																						
Underutilized (Yes/No)							No	No	No	No	No	No	Yes	34%	No	No	No	Yes	1%	No		
Number Needed to Reach Parity													45						1			
Planned percent increase Year 1													5%					1%				
Planned percent increase Year 2													5%									
Planned percent increase Year 3													5%									
Planned percent increase Year 4													5%									
<b>7 - Skilled Craft</b>																						
Current Workforce	\$53,000 - \$100,000	366	260	102	0	4	260	-	92	8	1	-	1	-	-	2	1	-	-	1		
Percent in Category	*Entry		71.0%	27.9%		1.1%	71.0%	0.0%	25.1%	2.2%	0.3%	0.0%	0.3%	0.0%	0.5%	0.3%	0.0%	0.0%	0.0%	0.3%		
Percent of Availability							68.7%	0.1%	13.8%	5.5%	1.0%	0.0%	1.2%	5.2%	0.0%	2.8%	0.8%	0.7%	0.0%	0.2%		
Percent Underutilized																						
Underutilized (Yes/No)							No	No	Yes	1%	No	Yes	Yes	5%	No	Yes	2%	1%	Yes	No		
Number Needed to Reach Parity													12	18		8	1	2				
Planned percent increase Year 1													1%			1%	1%	1%				
Planned percent increase Year 2													2%									
Planned percent increase Year 3													2%									
Planned percent increase Year 4													2%									
<b>8 - Service-Maintenance</b>																						
Current Workforce	\$33,000 - \$89,000	1016	74	543	22	377	74	1	523	14	-	-	5	22	-	365	3	1	-	8		
Percent in Category	*Entry		7.3%	53.4%	2.2%	37.1%	7.3%	0.1%	51.5%	1.4%	0.0%	0.0%	0.5%	2.2%	0.0%	35.9%	0.3%	0.1%	0.0%	0.8%		
Percent of Availability							32.1%	0.1%	16.8%	3.9%	0.9%	0.0%	1.3%	24.7%	0.1%	15.6%	2.7%	1.1%	0.0%	0.9%		
Percent Underutilized																						
Underutilized (Yes/No)							No	No	Yes	Yes	No	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	No		
Number Needed to Reach Parity													25	8	229	1		24	10	1		
Planned percent increase Year 1													1%				1%	1%				
Planned percent increase Year 2													1%				1%					
Planned percent increase Year 3													5%				1%					
Planned percent increase Year 4													5%				1%					



## Appendix B – 2024-2027 Goal Summary

EEO-4 Job Category	2024 – 2027 Goals													
	Male							Female						
	W	AI/AN	B	H	A	NHOPI	2 or More	W	AI/AN	B	H	A	NHOPI	2 or More
Officials & Administrators	-	-	-	-	-	-	-	2	-	-	-	-	-	-
Professionals	-	-	-	-	3	-	-	55	-	-	1	1	-	-
Technicians	-	-	-	-	-	-	-	20	-	-	2	-	-	-
Protective Service	-	-	8	-	-	-	-	2	-	-	-	-	-	-
Admin Support	-	-	-	-	-	-	-	45	-	-	-	1	-	-
Skilled Craft	-	-	-	12	2	-	3	18	-	8	1	2	-	-
Service / Maintenance	-	-	-	25	9	-	8	229	1	-	24	10	-	1
Grand Total	-	-	8	37	14	-	11	371	1	8	28	14	-	1







## Appendix D – Employment Practices Chart

### 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
<b>1 - Officials &amp; Administrators</b>																
Number Applied	162	108	116	55			35	48	7	1	1	4	-	-	3	-
Total Hires	7	10	6	10			-	-	1	-	-	-	-	-	-	-
Selection Rate	4.3%	9.3%	5.2%	18.2%	N/A	N/A	0.0%	0.0%	14.3%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	46.7%	100.0%	28.4%	100.0%	N/A	N/A	0.0%	0.0%	78.6%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	Yes	No	Yes	No	N/A	N/A	Yes	Yes	Yes	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>2 - Professionals</b>																
Number Applied	1,787	1,582	951	481	3	3	603	892	83	77	87	41	1	3	59	85
Total Hires	73	68	48	38	-	-	17	22	5	2	2	2	-	-	1	4
Selection Rate	4.1%	4.3%	5.0%	7.9%	N/A	N/A	2.8%	2.5%	6.0%	2.6%	2.3%	N/A	N/A	N/A	N/A	4.7%
Ratio to Highest Rate	95.0%	100.0%	63.9%	100.0%	N/A	N/A	35.7%	31.2%	76.3%	32.9%	29.1%	N/A	N/A	N/A	N/A	59.6%
Potential Adverse Impact (Yes/No)	No	No	Yes	No	N/A	N/A	Yes	Yes	Yes	Yes	Yes	N/A	N/A	N/A	N/A	Yes
<b>3 - Technicians</b>																
Number Applied	287	175	138	42	1	-	124	119	13	4	2	1	1	-	8	9
Total Hires	18	8	13	2	-	-	3	5	2	-	-	1	-	-	-	-
Selection Rate	6.3%	4.6%	9.4%	4.8%	N/A	N/A	2.4%	4.2%	15.4%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	72.9%	61.2%	31.0%	N/A	N/A	15.7%	27.3%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	Yes	Yes	Yes	N/A	N/A	Yes	Yes	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>4 - Protective Service</b>																
Number Applied	634	376	197	37	1	-	363	304	47	6	5	3	2	-	19	26
Total Hires	27	15	13	2	-	-	8	12	5	1	-	-	-	-	1	-
Selection Rate	4.3%	4.0%	6.6%	5.4%	N/A	N/A	2.2%	3.9%	10.6%	N/A	N/A	N/A	N/A	N/A	N/A	0.0%
Ratio to Highest Rate	100.0%	93.7%	62.0%	50.8%	N/A	N/A	20.7%	37.1%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	0.0%
Potential Adverse Impact (Yes/No)	No	No	Yes	Yes	N/A	N/A	Yes	Yes	No	N/A	N/A	N/A	N/A	N/A	N/A	Yes
<b>5 - Paraprofessional</b>																
Number Applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Hires	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
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
<b>6 - Administrative Support</b>																
Number Applied	500	1,250	109	192	2	2	323	954	33	55	5	5	2	2	26	40
Total Hires	11	27	4	10	-	-	6	15	1	2	-	-	-	-	-	-
Selection Rate	2.2%	2.2%	3.7%	5.2%	N/A	N/A	1.9%	1.6%	N/A	3.6%	N/A	N/A	N/A	N/A	N/A	0.0%
Ratio to Highest Rate	100.0%	98.2%	70.5%	100.0%	N/A	N/A	35.7%	30.2%	N/A	69.8%	N/A	N/A	N/A	N/A	N/A	0.0%
Potential Adverse Impact (Yes/No)	No	No	Yes	No	N/A	N/A	Yes	Yes	N/A	Yes	N/A	N/A	N/A	N/A	N/A	Yes
<b>7 - Skilled Craft</b>																
Number Applied	1,388	133	537	9	2	-	732	113	73	3	9	-	-	2	35	6
Total Hires	72	1	51	-	-	-	16	1	5	-	-	-	-	-	-	-
Selection Rate	5.2%	0.8%	9.5%	N/A	N/A	N/A	2.2%	0.9%	6.8%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	14.5%	100.0%	N/A	N/A	N/A	23.0%	9.3%	72.1%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	Yes	No	N/A	N/A	N/A	Yes	Yes	Yes	N/A	N/A	N/A	N/A	N/A	Yes	N/A
<b>8 - Service-Maintenance</b>																
Number Applied	4,983	3,403	567	139	25	8	4,099	3,049	134	42	8	8	8	4	142	153
Total Hires	441	396	44	19	3	2	375	358	11	3	1	1	1	-	6	13
Selection Rate	8.9%	11.6%	7.8%	N/A	N/A	N/A	9.1%	11.7%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	76.1%	100.0%	66.1%	N/A	N/A	N/A	77.9%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	Yes	No	Yes	N/A	N/A	N/A	Yes	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Notes: [Number Applied] EEO-4 Category 1: 2 Males and 2 Females did not disclose their race; Category 2: 41 Males and 30 Females did not disclose their race; Category 3: 3 Males and 1 Female did not disclose their race; Category 4: 5 Males and 2 Females did not disclose their race; Category 6: 9 Males and 18 Females did not disclose their race; Category 7: 17 Males and 8 Females did not disclose their race. Category 8: 69 Males and 26 Females did not disclose their race. [Total Hired] EEO-4 Category 3: 1 Male did not disclose their race; Category 8: 1 Male did not disclose their race.																
<b>Persons with Disabilities</b>																
Number Applied	-	1	-	-	-	-	-	1	-	-	-	-	-	-	-	-
Total Hires	-	1	-	-	-	-	-	1	-	-	-	-	-	-	-	-
Selection Rate	N/A	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
<b>Veterans</b>																
Number Applied	9	-	1	-	-	-	8	-	-	-	-	-	-	-	-	-
Total Hires	19	3	1	-	-	-	16	3	1	-	-	-	-	-	1	-
Selection Rate	211.1%	N/A	100.0%	N/A	N/A	N/A	200.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A



Adverse Impact Analysis by Job Category – Promotions

Job Category (Use EEO-4)	Total		W		AI/AN		B		H/L		A		NHOP		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
<b>1 - Officials &amp; Administrators</b>																
Number Applied	16	9	4	4	-	-	11	5	1	-	-	-	-	-	-	-
Total Promotions	7	2	3	1	-	-	3	1	1	-	-	-	-	-	-	-
Selection Rate	43.8%	22.2%	75.0%	25.0%	N/A	N/A	27.3%	20.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	50.8%	75.0%	25.0%	N/A	N/A	27.3%	20.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	Yes	Yes	Yes	N/A	N/A	Yes	Yes	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>2 - Professionals</b>																
Number Applied	213	167	82	16	-	-	114	138	7	2	4	2	-	-	6	9
Total Promotions	61	34	37	16	-	-	19	16	1	-	4	1	-	-	-	1
Selection Rate	28.6%	20.4%	45.1%	100.0%	N/A	N/A	16.7%	11.6%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	11.1%
Ratio to Highest Rate	100.0%	71.1%	45.1%	100.0%	N/A	N/A	16.7%	11.6%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	11.1%
Potential Adverse Impact (Yes/No)	No	Yes	Yes	No	N/A	N/A	Yes	Yes	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Yes
<b>3 - Technicians</b>																
Number Applied	92	52	29	2	-	-	59	44	3	2	-	-	-	-	1	4
Total Promotions	19	8	10	2	-	-	8	6	1	-	-	-	-	-	-	-
Selection Rate	20.7%	15.4%	34.5%	N/A	N/A	N/A	13.6%	13.6%	33.3%	N/A	N/A	N/A	N/A	N/A	N/A	0.0%
Ratio to Highest Rate	100.0%	74.5%	100.0%	N/A	N/A	N/A	39.3%	39.5%	96.7%	N/A	N/A	N/A	N/A	N/A	N/A	0.0%
Potential Adverse Impact (Yes/No)	No	Yes	No	N/A	N/A	N/A	Yes	Yes	No	N/A	N/A	N/A	N/A	N/A	N/A	Yes
<b>4 - Protective Service</b>																
Number Applied	58	33	2	1	-	-	47	30	7	-	-	1	-	-	2	1
Total Promotions	6	10	1	6	-	-	4	4	1	-	-	-	-	-	-	-
Selection Rate	10.3%	30.3%	50.0%	N/A	N/A	N/A	8.5%	13.3%	14.3%	N/A	N/A	N/A	N/A	N/A	0.0%	N/A
Ratio to Highest Rate	34.1%	100.0%	100.0%	N/A	N/A	N/A	17.0%	26.7%	28.6%	N/A	N/A	N/A	N/A	N/A	0.0%	N/A
Potential Adverse Impact (Yes/No)	Yes	No	No	N/A	N/A	N/A	Yes	Yes	Yes	N/A	N/A	N/A	N/A	N/A	Yes	N/A
<b>5 - Paraprofessional</b>																
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
<b>6 - Administrative Support</b>																
Number Applied	156	310	13	18	-	-	130	272	8	10	-	2	-	-	5	8
Total Promotions	10	33	-	5	-	-	10	24	-	-	-	-	-	-	-	4
Selection Rate	6.4%	10.6%	0.0%	27.8%	N/A	N/A	7.7%	8.8%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	60.2%	100.0%	0.0%	100.0%	N/A	N/A	27.7%	31.8%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	Yes	No	Yes	No	N/A	N/A	Yes	Yes	N/A	Yes	N/A	N/A	N/A	N/A	N/A	N/A
<b>7 - Skilled Craft</b>																
Number Applied	482	33	171	-	-	-	283	31	15	2	-	-	-	-	13	-
Total Promotions	101	63	16	6	-	-	78	55	3	-	1	-	-	-	3	2
Selection Rate	21.0%	190.9%	9.4%	N/A	N/A	N/A	27.6%	177.4%	20.0%	N/A	N/A	N/A	N/A	N/A	23.1%	N/A
Ratio to Highest Rate	11.0%	100.0%	5.3%	N/A	N/A	N/A	15.5%	100.0%	11.3%	N/A	N/A	N/A	N/A	N/A	13.0%	N/A
Potential Adverse Impact (Yes/No)	Yes	No	Yes	N/A	N/A	N/A	Yes	No	Yes	N/A	N/A	N/A	N/A	N/A	Yes	N/A
<b>8 - Service-Maintenance</b>																
Number Applied	445	340	52	9	-	-	374	315	10	2	1	-	-	-	8	14
Total Promotions	64	3	38	-	-	-	22	1	3	1	-	-	-	-	1	1
Selection Rate	14.4%	0.9%	73.1%	N/A	N/A	N/A	5.9%	0.3%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	6.1%	100.0%	N/A	N/A	N/A	8.0%	0.4%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	Yes	No	N/A	N/A	N/A	Yes	Yes	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Notes: [Number Applied] EEO-4 Category 2: 8 Females and 6 Males did not disclose their race; Category 4: 1 Male did not disclose their race; Category 6: 6 Females and 8 Males did not disclose their race; Category 7: 4 Males and 8 Females did not disclose their race; Category 8: 19 Males and 6 Females did not disclose their race. [Total Promoted] EEO-4 Category 2: 12 Males and 12 Females did not disclose their race; Category 3: 3 Males and 2 Females did not disclose their race; Category 6: 6 Males and 2 Females did not disclose their race; Category 7: 29 Males and 29 Females did not disclose their race; Category 8: 7 Males did not disclose their race.

Persons with Disabilities	Total		W		AI/AN		B		H/L		A		NHOP		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Number Applied	-	1	-	-	-	-	-	1	-	-	-	-	-	-	-	-
Total Promotions	13	2	2	-	-	-	10	2	-	-	-	-	-	-	1	-
Selection Rate	N/A	200.0%	N/A	N/A	N/A	N/A	N/A	200.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>Veterans</b>																
Number Applied	9	-	1	-	-	-	8	-	-	-	-	-	-	-	-	-
Total Promotions	26	4	13	1	-	-	13	3	-	-	-	-	-	-	-	-
Selection Rate	288.9%	N/A	1300.0%	N/A	N/A	N/A	162.5%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A



Adverse Impact Analysis by Job Category – Training

Job Category (Use EEO-4)	Total		W		A/IAN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
<b>1 - Officials &amp; Administrators</b>																
Total Workforce	43	24	29	16			10	8	2		2					
Total Trained	23	11	16	8			5	3	1		1					
Training Rate	53.5%	45.8%	55.2%	50.0%	N/A	N/A	50.0%	37.5%	50.0%	N/A	50.0%	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	85.7%	100.0%	90.6%	N/A	N/A	90.6%	68.0%	90.6%	N/A	90.6%	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	Yes	No	N/A	No	N/A	N/A	N/A	N/A	N/A
<b>2 - Professionals</b>																
Total Workforce	300	203	193	86			85	98	11	7	7	6			4	6
Total Trained	170	121	112	50			45	58	6	5	4	3			3	5
Training Rate	56.7%	59.6%	58.0%	58.1%	N/A	N/A	52.9%	59.2%	54.5%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	95.1%	100.0%	98.1%	98.2%	N/A	N/A	89.5%	100.0%	92.2%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	No	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>3 - Technicians</b>																
Total Workforce	132	53	84	16			36	35	7		4	2			1	
Total Trained	74	30	45	8			22	21	4		2	1				1
Training Rate	56.1%	56.6%	53.6%	50.0%	N/A	N/A	61.1%	60.0%	57.1%	N/A	50.0%	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	99.0%	100.0%	87.7%	81.8%	N/A	N/A	100.0%	98.2%	93.5%	N/A	81.8%	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	No	No	N/A	No	N/A	N/A	N/A	N/A	N/A
<b>4 - Protective Service</b>																
Total Workforce	140	43	98	8			22	33	18	2					2	
Total Trained	68	19	45	3			12	15	10	1						1
Training Rate	48.6%	44.2%	45.9%	37.5%	N/A	N/A	54.5%	45.5%	55.6%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	91.0%	82.7%	67.5%	N/A	N/A	98.2%	81.8%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	Yes	N/A	N/A	No	No	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>5 - Paraprofessional</b>																
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
<b>6 - Administrative Support</b>																
Total Workforce	97	185	23	26		2	70	144	4	9						4
Total Trained	55	96	14	13		1	39	75	2	5						2
Training Rate	56.7%	51.9%	60.9%	50.0%	N/A	N/A	55.7%	52.1%	N/A	55.6%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	91.5%	100.0%	82.1%	N/A	N/A	91.5%	85.6%	N/A	91.3%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A
<b>7 - Skilled Craft</b>																
Total Workforce	803	9	573	-			207	5	19	2	2				2	2
Total Trained	441	5	313	-			115	3	11	1	1				1	1
Training Rate	54.9%	55.6%	54.6%	N/A	N/A	N/A	55.6%	N/A	57.9%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	98.9%	100.0%	94.4%	N/A	N/A	N/A	96.0%	N/A	100.0%	N/A	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	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>8 - Service Maintenance</b>																
Total Workforce	1,607	1,091	190	53	4	1	1,361	995	35	8	2	2	1		14	32
Total Trained	990	692	116	31	3	1	838	630	21	5	2	1	1		9	24
Training Rate	61.6%	63.4%	61.1%	N/A	N/A	N/A	61.6%	63.3%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	97.1%	100.0%	96.4%	N/A	N/A	N/A	97.2%	100.0%	N/A	N/A	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	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Notes: **EEO-4 Category 1:** 1 male and 4 females did not disclose their race; **Category 2:** 5 males and 12 females did not disclose their race, and 8 employees did not disclose either; **Category 3:** 1 male and 1 female did not disclose their race; **Category 6:** 2 males and 5 females did not disclose their race; **Category 7:** 3 males did not disclose their race; **Category 8:** 23 males and 7 females did not disclose their race.







<b>4 - Protective Service</b>																
Total Workforce	140	43	98	8	-	-	22	33	18	2	-	-	-	-	-	2
<b>First Written Reminder</b>	6	4	5	-	-	-	1	4	-	-	-	-	-	-	-	-
Discipline Rate	4.3%	9.3%	5.1%	0.0%	N/A	N/A	4.5%	12.1%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	46.1%	0.0%	100.0%	N/A	N/A	0.0%	0.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	No	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>Second Written Reminder</b>	1	1	1	-	-	-	-	1	-	-	-	-	-	-	-	-
Discipline Rate	0.7%	2.3%	1.0%	0.0%	N/A	N/A	0.0%	3.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	30.7%	0.0%	100.0%	N/A	N/A	100.0%	0.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	No	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>Discharge</b>	1	-	1	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	0.7%	0.0%	1.0%	0.0%	N/A	N/A	0.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	0.0%	100.0%	0.0%	100.0%	N/A	N/A	100.0%	100.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	No	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>Decision Making Leave</b>	3	1	-	-	-	-	2	1	1	-	-	-	-	-	-	-
Discipline Rate	2.1%	2.3%	0.0%	0.0%	N/A	N/A	9.1%	3.0%	5.6%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	92.1%	100.0%	100.0%	N/A	N/A	0.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	No	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>Discharged/Brought Back</b>	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1
Discipline Rate	0.7%	0.0%	0.0%	0.0%	N/A	N/A	0.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	0.0%	100.0%	100.0%	100.0%	N/A	N/A	100.0%	100.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	No	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>Suspension</b>	2	-	1	-	-	-	-	-	-	-	-	-	-	-	-	1
Discipline Rate	1.4%	0.0%	1.0%	0.0%	N/A	N/A	0.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	0.0%	100.0%	0.0%	100.0%	N/A	N/A	100.0%	100.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	No	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>6 - Administrative Support</b>																
Total Workforce	97	185	23	26	-	2	70	144	4	9	-	-	-	-	-	4
<b>First Written Reminder</b>	16	17	1	-	-	-	12	16	3	-	-	-	-	-	-	1
Discipline Rate	16.5%	9.2%	4.3%	0.0%	N/A	N/A	17.1%	11.1%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	55.7%	100.0%	0.0%	100.0%	N/A	N/A	0.0%	0.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A
<b>Second Written Reminder</b>	4	8	-	1	-	-	3	6	1	1	-	-	-	-	-	-
Discipline Rate	4.1%	4.3%	0.0%	3.8%	N/A	N/A	4.3%	4.2%	N/A	11.1%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	95.4%	100.0%	0.0%	N/A	N/A	0.0%	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A
<b>Discharge</b>	1	2	1	-	-	-	-	2	-	-	-	-	-	-	-	-
Discipline Rate	1.0%	1.1%	4.3%	0.0%	N/A	N/A	0.0%	1.4%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	95.4%	0.0%	100.0%	N/A	N/A	100.0%	0.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A
<b>Decision Making Leave</b>	2	2	-	-	-	-	1	2	1	-	-	-	-	-	-	-
Discipline Rate	2.1%	1.1%	0.0%	0.0%	N/A	N/A	1.4%	1.4%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	52.4%	100.0%	100.0%	100.0%	N/A	N/A	0.0%	0.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A
<b>Discharged/Brought Back</b>	-	1	-	-	-	-	-	1	-	-	-	-	-	-	-	-
Discipline Rate	0.0%	0.5%	0.0%	0.0%	N/A	N/A	0.0%	0.7%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	0.0%	100.0%	100.0%	N/A	N/A	100.0%	0.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A
<b>&lt;Enter Discipline Type&gt;</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	0.0%	0.0%	0.0%	0.0%	N/A	N/A	0.0%	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	100.0%	100.0%	100.0%	N/A	N/A	100.0%	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A
<b>7 - Skilled Craft</b>																
Total Workforce	803	9	573	-	-	-	207	5	19	2	2	-	-	-	-	2
<b>First Written Reminder</b>	70	3	35	-	-	-	33	1	2	1	-	-	-	-	-	1
Discipline Rate	8.7%	33.3%	6.1%	N/A	N/A	N/A	15.9%	N/A	10.5%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	26.2%	100.0%	N/A	N/A	N/A	38.3%	N/A	58.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	Yes	No	N/A	N/A	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>Second Written Reminder</b>	19	-	11	-	-	-	8	-	-	-	-	-	-	-	-	-
Discipline Rate	2.4%	0.0%	1.9%	N/A	N/A	N/A	3.9%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	0.0%	100.0%	0.0%	N/A	N/A	N/A	0.0%	N/A	100.0%	N/A	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	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>Discharge</b>	11	-	7	-	-	-	4	-	-	-	-	-	-	-	-	-
Discipline Rate	1.4%	0.0%	1.2%	N/A	N/A	N/A	1.9%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	0.0%	100.0%	0.0%	N/A	N/A	N/A	0.0%	N/A	100.0%	N/A	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	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>Decision Making Leave</b>	3	-	1	-	-	-	1	-	1	-	-	-	-	-	-	-
Discipline Rate	0.4%	0.0%	0.2%	N/A	N/A	N/A	0.5%	N/A	5.3%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	0.0%	100.0%	100.0%	N/A	N/A	N/A	36.1%	N/A	3.3%	N/A	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	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>Suspension</b>	4	-	3	-	-	-	1	-	-	-	-	-	-	-	-	-
Discipline Rate	0.5%	0.0%	0.5%	N/A	N/A	N/A	0.5%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	0.0%	100.0%	0.0%	N/A	N/A	N/A	0.0%	N/A	100.0%	N/A	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	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>&lt;Enter Discipline Type&gt;</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	0.0%	0.0%	0.0%	N/A	N/A	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	100.0%	100.0%	N/A	N/A	N/A	100.0%	N/A	100.0%	N/A	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	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A



8 - Service-Maintenance																
Total Workforce	1,607	1,091	190	53	4	1	1,361	995	35	8	2	2	1	-	14	32
First Written Reminder	686	430	81	11	-	-	590	396	9	1	2	2	-	-	4	20
Discipline Rate	42.7%	39.4%	42.6%	N/A	N/A	N/A	43.4%	39.8%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	92.3%	100.0%	93.4%	N/A	N/A	N/A	91.8%	100.0%	N/A	N/A	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	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Second Written Reminder	155	106	26	2	-	-	126	101	2	-	1	1	-	-	-	2
Discipline Rate	9.6%	9.7%	13.7%	N/A	N/A	N/A	9.3%	10.2%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	99.3%	67.7%	N/A	N/A	N/A	100.0%	91.2%	N/A	N/A	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	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Demotion	1	-	-	-	-	-	1	-	-	-	-	-	-	-	-	-
Discipline Rate	0.1%	0.0%	0.0%	N/A	N/A	N/A	0.1%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	0.0%	100.0%	100.0%	N/A	N/A	N/A	0.0%	100.0%	N/A	N/A	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	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CDL Suspension	2	-	-	-	-	-	2	-	-	-	-	-	-	-	-	-
Discipline Rate	0.1%	0.0%	0.0%	N/A	N/A	N/A	0.1%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	0.0%	100.0%	100.0%	N/A	N/A	N/A	0.0%	100.0%	N/A	N/A	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	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Discharge	86	78	-	-	-	-	83	73	1	-	-	-	-	-	2	5
Discipline Rate	5.4%	7.1%	0.0%	N/A	N/A	N/A	6.1%	7.3%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	74.9%	100.0%	N/A	N/A	N/A	0.0%	0.0%	N/A	N/A	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	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Decision Making Leave	50	38	-	-	-	-	50	37	-	-	-	-	-	-	-	1
Discipline Rate	3.1%	3.5%	0.0%	N/A	N/A	N/A	3.7%	3.7%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	89.3%	100.0%	N/A	N/A	N/A	0.0%	0.0%	N/A	N/A	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	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Notes: EEO-4 Category 8: Discharged/Brought Back: 8 BM, 9 BF; Suspension: 1 WM, 19 BM, 6 BF, 1 AM, 2MF. Category 7: 2 employees did not disclose their race or sex; Category 8: 30 employees did not disclose their race or sex.

### Adverse Impact Analysis by Job Category - Terminations

Job Category (Use EEO-4)	Total		W		A/I/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
<b>1 - Officials &amp; Administrators</b>																
Total Workforce	43	24	29	16	-	-	10	8	2	-	2	-	-	-	-	-
Total Involuntary Terminations	1	2	-	1	-	-	-	1	1	-	-	-	-	-	-	-
Involuntary Termination Rate	2.3%	8.3%	0.0%	6.3%	N/A	N/A	0.0%	12.5%	50.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	27.9%	100.0%	0.0%	N/A	N/A	100.0%	0.0%	0.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	No	Yes	N/A	No	N/A	N/A	N/A	N/A	N/A
<b>2 - Professionals</b>																
Total Workforce	300	203	193	66	-	-	65	98	11	7	7	6	-	-	4	6
Total Involuntary Terminations	23	10	13	5	-	-	6	1	2	1	2	1	-	-	-	2
Involuntary Termination Rate	7.7%	4.9%	6.7%	5.8%	N/A	N/A	7.1%	1.0%	18.2%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	64.3%	100.0%	15.1%	17.6%	N/A	N/A	14.5%	100.0%	5.6%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	No	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>3 - Technicians</b>																
Total Workforce	132	53	84	16	-	-	36	35	7	-	4	2	-	-	1	-
Total Involuntary Terminations	3	-	3	-	-	-	-	-	-	-	-	-	-	-	-	-
Involuntary Termination Rate	2.3%	0.0%	3.6%	0.0%	N/A	N/A	0.0%	0.0%	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	0.0%	100.0%	0.0%	100.0%	N/A	N/A	100.0%	100.0%	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	No	No	N/A	No	N/A	N/A	N/A	N/A	N/A
<b>4 - Protective Service</b>																
Total Workforce	140	43	98	8	-	-	22	33	18	2	-	-	-	-	2	-
Total Involuntary Terminations	4	2	1	-	-	-	2	2	-	-	-	-	-	-	1	-
Involuntary Termination Rate	2.9%	4.7%	1.0%	0.0%	N/A	N/A	9.1%	6.1%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	61.4%	0.0%	100.0%	N/A	N/A	0.0%	0.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	No	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>5 - Paraprofessional</b>																
Total Workforce	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Involuntary Terminations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Involuntary Termination 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 Lowest 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

<b>6 - Administrative Support</b>																
Total Workforce	97	185	23	26	-	2	70	144	4	9	-	-	-	-	-	4
Total Involuntary Terminations	7	2	2				4	2	1	-	-	-	-	-	-	-
Involuntary Termination Rate	7.2%	1.1%	8.7%	0.0%	N/A	N/A	5.7%	1.4%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	15.0%	100.0%	0.0%	100.0%	N/A	N/A	0.0%	0.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A
<b>7 - Skilled Craft</b>																
Total Workforce	803	9	573	-	-	-	207	5	19	2	2	-	-	-	-	2
Total Involuntary Terminations	15	-	9				5	-	1	-	-	-	-	-	-	-
Involuntary Termination Rate	1.9%	0.0%	1.6%	N/A	N/A	N/A	2.4%	N/A	5.3%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	0.0%	100.0%	100.0%	N/A	N/A	N/A	65.0%	N/A	29.8%	N/A	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	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>8 -Service-Maintenance</b>																
Total Workforce	1,607	1,091	190	53	4	1	1,361	995	35	8	2	2	1	-	14	32
Total Involuntary Terminations	189	166	9	5	2	2	169	153	3	-	2	-	-	-	4	6
Involuntary Termination Rate	11.8%	15.2%	4.7%	N/A	N/A	N/A	12.4%	15.4%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	77.3%	100.0%	N/A	N/A	N/A	38.1%	30.8%	N/A	N/A	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	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

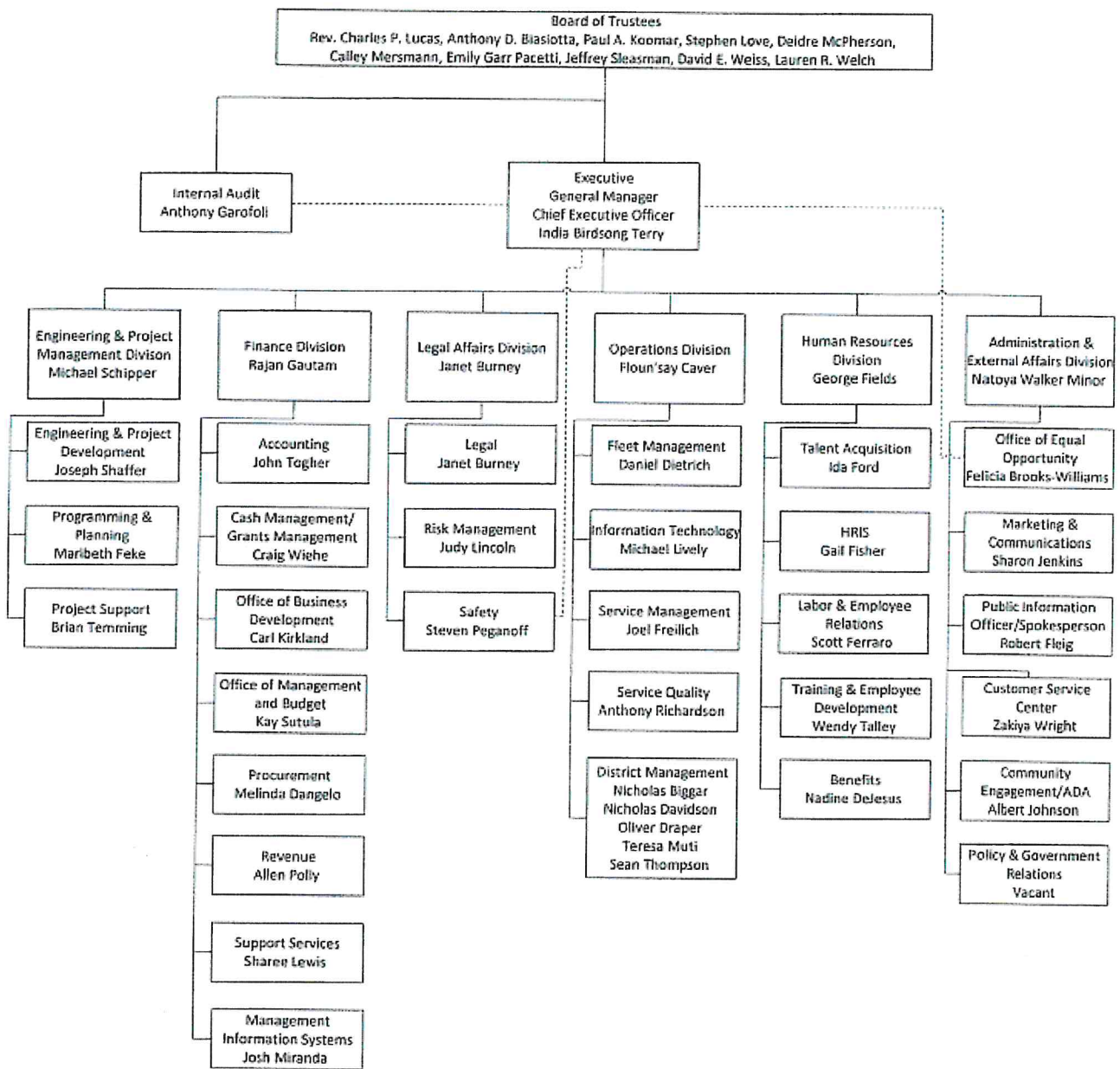
Notes: EEO-4 Category 1: 1 male and 2 females did not disclose their race; Category 2: 1 male and 1 female did not disclose their race; Category 6: 2 female employees did not disclose their race; Category 7: 1 male employee did not disclose their race; Category 8: 4 males and 4 females did not disclose their race.



## Appendix E – Recruitment Sources

AARP Senior Comm. Service Employee Program	Lorain County Community College
Akron University	Lorain County Library
Aerozone Job Fair	Maingate Business Development Corporation
Army Pays	Miami Jacobs Career College (formerly Academy of Court Reporting)
ASHE Cleveland	Notre Dame College Career Placement Office
Asian Services In Action, Inc	Ohio Means Jobs
Autozone	Ohio Northern University
Baldwin Wallace	Ohio Technical College
BGSU	Partner Up High School Career Fair
Bryant & Stratton	Piston Power Auto-Rama IX-Center
Case Western Reserve University	Plexus LBGTQ+ Career Fair
Cleveland Business Consultants	Polaris Career Center
Cleveland Engineering Society	Portage Lakes Career Fair
Cleveland Heights Consortium	Remington College
Cleveland Marshall College of Law c/o Office of Career Planning	Spanish American Committee
Cleveland Public Library	Technical Institute
Cuyahoga County Library	Toledo University
Cuyahoga Valley Career Job Fair	Towards Employment
El Barrio	Urban League of Greater Cleveland
Employment Connection	Vatterott College
Greatinsurancejobs.com	Vocational Guidance Services East
Hard Hatted Women	Hough Job Match Office-2nd Floor
Harvard Community Services Center	Westside Neighborhood Opportunity Center (May Dugan Center)
Hispanic Alliance	Esperanza Inc.
ITT Technical Institute	
Lakeland Community College	

## Appendix F – Organizational Chart





## Appendix G – Demonstration of Subrecipient Contact and Receipt of EEOP

Good Morning,

My name is Felicia Brooks-Williams. I am the Sr. Manager of the Office of Equal Opportunity at the Greater Cleveland Regional Transit Authority (GCRTA). Congratulations, on being awarded another contract agreement to provide supplemental services to our ADA customers.

This email is to inform you that GCRTA must comply with FTA Circular 4704.1A Ch. 1.4 Applicability.

Any FTA recipient, subrecipient and contractor who meet the following threshold requirements must implement all of the EEO Program elements:

- Employs 100 or more transit-related employees, and
- Requests or receives capital or operating assistance in excess of \$1 million in the previous Federal fiscal year, or requests or receives planning assistance in excess of \$250,00 in previous Federal fiscal year.

Any FTA applicant, recipient, subrecipient, and contractor who meet both of the following threshold requirements must prepare and maintain an abbreviated EEO program:

- Employs 50-99 transit-related employees, and
- Requests or receives capital or operating assistance in excess of \$1 million in the previous Federal fiscal year, or requests or receives planning assistance in excess of \$250,00 in previous Federal fiscal year.

As a result of the FTA Circular 4704.1A, please provide the following information:

- 1) How many employees are working on GCRTA's contract?
- 2) Provide a copy of your EEO Program if you employ more than 100 employees under GCRTA's contract or an abbreviated EEO program which consist of the following:

Statement of Policy  
Dissemination Plan  
Designation of Personnel  
Assessment of employment Practices; and  
Monitoring and Reporting System

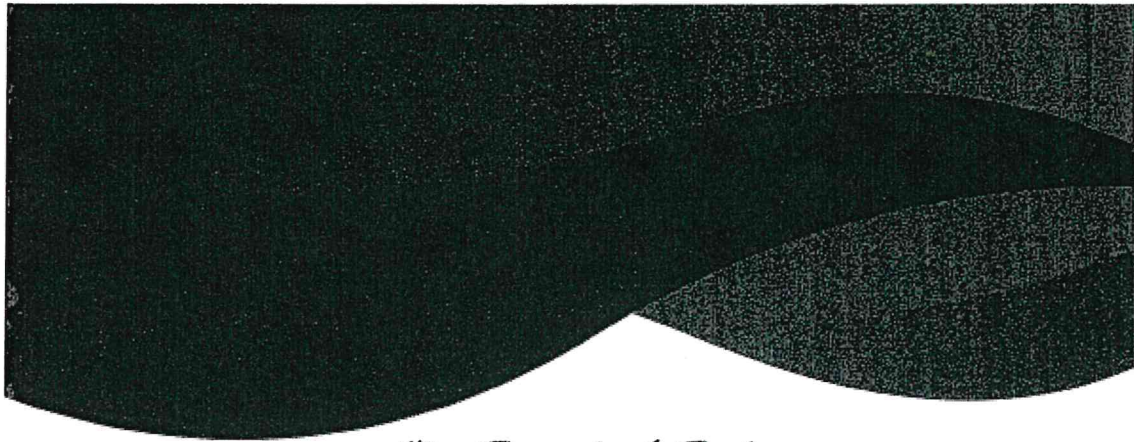
If you do not have all the items above, please provide what you have on hand by the end of today. This information must be submitted to the FTA Auditor. Please feel free to contact me, if you have any questions regarding the above information.

Thank you for your cooperation.

Sincerely,

*Felicia Brooks Williams*

Senior Manager,  
Office of Equal Opportunity, ADA & DEI  
[fbwilliams@gcrtta.org](mailto:fbwilliams@gcrtta.org)  
Pronouns: She, Her, Hers  
Tel: 216-356-3094



PROVIDE A RIDE'S  
EEO PROGRAM  
2024



# Equal Employment Opportunity (EEO) Program

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SENIOR  
TRANSPORTATION  
CONNECTION



## GC TRANSPORTS: EEO COMPLIANCE PLAN

### I. EEO Statement:

*Excerpt from GC Transports Employee Handbook.* GC Transports is committed to the principles of equal opportunity and treats all team members, as well as qualified applicants, equally, regardless of race, color, religion, ancestry, national origin, citizenship status, sex, sexual orientation, gender identity, pregnancy, age, physical or mental disability, marital status, veteran's status, genetic information or any other characteristic or status protected under federal, state or local law. This policy applies to all areas of employment including recruitment, hiring, training, testing, placement, promotion, compensation, benefits, termination, transfer, demotion, layoff, leave of absence, and social programs.

*Excerpt from GC Transports Employee Handbook - Reasonable Accommodation Policy.* It is GC Transports' policy to provide equal opportunity in employment for all qualified individuals regardless of disability. GC Transports is committed to complying with the Americans with Disabilities Act (the "ADA"), Title VII of the Civil Rights Act ("Title VII") and applicable state and local laws prohibiting discrimination against qualified individuals with disabilities or sincerely held religious beliefs.

Team members who believe they need reasonable accommodation to perform the essential functions of their job should contact the Human Resources Department. Any supervisor or manager who receives a request for reasonable accommodation should refer the team member to the Human Resources Department and notify that department of the request. The team member requesting reasonable accommodation should specify the specific accommodation he or she is seeking to perform the essential functions of his or her job. GC Transports is committed to participating in an interactive accommodation process with an individual who requests an accommodation.

*Excerpt from GC Transports Employee Handbook - Harassment, Discrimination and Retaliation Policy.* GC Transports is committed to providing a workplace free from discrimination, harassment, and retaliation. Therefore, GC Transports will not tolerate harassment of any type based on race, color, religion, sex (including pregnancy, sexual orientation, and gender identity), national origin, age (40 or older), disability, or genetic information and other characteristics protected under state, federal or local laws. Such conduct in any form is prohibited in the





Attachment B

## Proposed Affirmative Action 2024-2027 Focus Areas

EEO-4 Job Category	Male White	Male Amer Ind	Male Black	Male Hispanic	Male Asian	Male Pac Isl	Male Multi	Female White	Female Amer Ind	Female Black	Female Hispanic	Female Asian	Female Pac Isl	Female Multi
Officials & Administrators								Yes						
Professionals					Yes			Yes			Yes	Yes		
Technicians								Yes			Yes			
Protective Service			Yes					Yes						
Administrative Support								Yes				Yes		
Semi-Skilled Craft				Yes	Yes		Yes	Yes		Yes	Yes	Yes		
Service Maintenance				Yes	Yes		Yes	Yes		Yes	Yes			Yes
<b>Total Focus Areas</b>	None		One	Two	Three		Two	Seven		Two	Four	Three	None	One

## Proposed Affirmative Action 2024-2027 Goals

EEO Job Category	Total Goals	Remaining Parity for Males	Remaining Parity for Females
Officials & Administrators	2	0	2 White
Professionals	60	3 Asian	55 White, 1 Hispanic/Latin, 1 Asian
Technicians	22	0	20 White, 2 Hispanic/Latin
Protective Service	10	8 Black	2 White
Administrative Support	46	0	45 White, 1 Asian
Semi-Skilled Craft	46	12 Hispanic/Latin, 2 Asian, 3 Multi Races	18 White, 8 Black, 1 Hispanic/Latin, 2 Asian
Service Maintenance	307	25 Hispanic/Latin, 9 Asian, 8 Multi Races	229 White, 1 American Indian, 24 Hispanic/Latin, 10 Asian, 1 Multi Races
<b>TOTAL</b>	<b>493</b>	<b>70</b>	<b>423</b>






TITLE/DESCRIPTION:  APPROVING THE GREATER CLEVELAND REGIONAL TRANSIT AUTHORITY'S 2024-2027 QUADRENNIAL EQUAL EMPLOYMENT OPPORTUNITY PROGRAM AND AFFIRMATIVE ACTION GOALS	Resolution No.: <b>2024-29</b>
	Date: April 11, 2024
	Initiator: Office of Equal Opportunity
ACTION REQUEST: <input checked="" type="checkbox"/> Approval <input type="checkbox"/> Review/Comment <input type="checkbox"/> Information Only <input type="checkbox"/> Other _____	

- 1.0 PURPOSE/SCOPE: This action will allow the Greater Cleveland Regional Transit Authority ("Authority") to approve the Quadrennial Equal Employment Opportunity Program (QEEOP) which establishes affirmative action goals for the employment of women and minorities in order to comply with the requirements and guidelines published by the U.S. Department of Transportation, Federal Transit Administration ("FTA").
- 2.0 DESCRIPTION/JUSTIFICATION: The Authority's Office of Equal Opportunity has determined the need for the Authority to approve the QEEOP and establish affirmative action goals for employing women and minorities during the four-year period 2024-2027 to comply with FTA requirements.
- 3.0 PROCUREMENT BACKGROUND: Does not apply.
- 4.0 AFFIRMATIVE ACTION/DBE BACKGROUND: Does not apply.
- 5.0 POLICY IMPACT: The Authority's Board of Trustees adopts the QEEOP and affirmative action goals in accordance with federal requirements.
- 6.0 ECONOMIC IMPACT: Failure to approve the QEEOP and establish affirmative action goals and timetables to comply with the terms of the federal requirements may result in a finding by the FTA of non-compliance with the FTA's Master Grant Agreement and the imposition of appropriate sanctions, including a refusal by the FTA to approve grant applications.
- 7.0 ALTERNATIVES: Reject request for approval of the 2024-2027 QEEOP which would risk the approval of grant applications.
- 8.0 RECOMMENDATION: The Authority's Committee of the Whole reviewed the QEEOP and affirmative action goals at its April 2, 2024, meeting and recommended approval to the full Board of Trustees. It is recommended that the 2024-2027 QEEOP and its affirmative action goals be approved and the Resolution passed authorizing the General Manager, Chief Executive Officer, and Chief Civil Rights Officer to implement the goals.

Recommended and certified as appropriate to the availability of funds, legal form and conformance with the Procurement requirements.

  
General Manager, Chief Executive Officer