

**GREATER LAFAYETTE PUBLIC TRANSPORTATION CORPORATION  
BOARD MEETING NO. 678**

**AGENDA  
July 10, 2023  
3:00 P.M.**

**ROUTINE BUSINESS**


None

**OLD BUSINESS**

None

**NEW BUSINESS**

1. Consideration of the EEO Policy Program (Exhibit I)

  
\_\_\_\_\_  
Julie Ginn  
Chairman

  
\_\_\_\_\_  
Bryan Walck  
Acting CEO

# **GREATER LAFAYETTE PUBLIC TRANSPORTATION CORPORATION**

## **EQUAL EMPLOYMENT OPPORTUNITY AFFIRMATIVE ACTION PROGRAM**

ADOPTED BY: JUNE 28, 2000  
LAST UPDATED: JULY 10, 2023

SOURCE: FTA CIRCULAR 4704.1

## **I. GREATER LAFAYETTE PUBLIC TRANSPORTATION CORPORATION EQUAL EMPLOYMENT OPPORTUNITY STATEMENT OF POLICY**

### **Purpose**

To provide a policy of non-discrimination to assure that equal opportunity shall be afforded to all persons.

### **Statement**

Specifically, it is the policy of the Greater Lafayette Public Transportation Corporation dba "CityBus" that all terms and conditions of employment including, but not necessarily limited to recruitment, appointment, promotion, compensation, benefits, transfers, training and educational opportunities, will be administered without regard to race, color, religion, sex, sexual orientation, national origin or ancestry, age or mental or physical disability, provided said disability does not inhibit essential job performance. Further, it is CityBus' intent to comply with appropriate federal and state laws, rules, and regulations and to give special attention to increasing the participation of minorities, women, and disabled persons in all facets of the Corporation's activities.

The responsibility for the implementation of the Equal Opportunity Employment Program rests with the Human Resources Administrator. All Management personnel share a responsibility to assure compliance. The performance by managers, supervisors, etc. will be evaluated on the success of the EEO Program just as it is in achieving other CityBus goals.

Applicants and employees have the right to file complaints of alleged discrimination with the Human Resources Administrator at 1250 Canal Road, Lafayette, IN 47904; Phone: 765/423-2666; Fax 765/742-4729 and e-mail [hr@gocitybus.com](mailto:hr@gocitybus.com). Achievement of EEO goals will provide benefits to CityBus through fuller utilization and development of previously underutilized human resources.

## **II. INTRODUCTION**

Equal opportunity is a broad objective involving more than the statement of policy. It is the objective of these "Equal Opportunity Policies" to establish a philosophy and procedure for ensuring equality of opportunity in employment, services, and contractual practices. The Board of Directors approved CityBus' "Equal Employment Opportunity Policy" on July 23, 1997. (Section III)

### **A. Equal Opportunity Administrator**

The CEO shall designate the Human Resources Administrator to administer the Equal Opportunity Program, including preparation of an workforce analysis and affirmative action plan. This person shall be responsible for creating and maintaining an

atmosphere of equality of opportunity in employment, services, and contractual practices among employees and the community. The essential requirements of the position are:

1. Sensitivity to, and an awareness of, the varied ways in which discrimination occurs;
2. Total commitment to EEO/AA program goals and objectives;
3. Knowledge of civil rights precepts, policies, rules, regulations and guidelines; and
4. Sufficient authority and ability to work and communicate with others (e.g., department heads) to achieve EEO/AA goals and objectives.  
Specifically, the Equal Opportunity Administrator (EOA) is charged with the following:
  - A. Keeping familiar with the equal opportunity guidelines and standards of federal and state agencies as may be necessary.
  - B. Analyzing and evaluating work force, employment, and contractual practices to determine underutilization and preparing an "Affirmative Action Analysis and Plan" for CityBus in accordance with the guidelines and standards of federal and state agencies as may be necessary.
  - C. Reviewing all changes in the "Employee Handbook" and "Staff Handbook" to ascertain whether they directly or indirectly have the effect of denying equal opportunity in employment and promotion to any person.
  - D. Maintaining an up-to-date list of public employment agencies, human resource and community organizations, nationally circulated planning and management employment publications, and area newspapers having a broad circulation in the community to be contacted in the recruitment of qualified persons in accordance with the Affirmative Action Plan.
  - E. Initiating and coordinating the internal and external dissemination of CityBus' current policy resolution on equal opportunity and affirmative action to all employees and the community.
  - F. Serving as a liaison between CityBus employees, minority organizations, referral sources, contracting organizations, and federal and state agencies in equal opportunity issues.
  - G. Providing in-service sessions, as applicable to those staff in hiring positions, in an effort to promote sensitivity to the philosophy of equal opportunity.
  - H. Establishing personal contact with appropriate organizations in order to strengthen recruitment of protected class individuals.
  - I. Reevaluating promotion, training, hiring, termination and disciplinary action

criteria of all persons on staff to determine if discrimination occurs in any of these cases.

- J. Maintaining contact with minority organizations to increase their knowledge regarding potential CityBus contracts in an attempt to ensure that contracts let by CityBus to minorities will approximate their representation in the population of the area.

## **B. Sexual Harassment**

It is the policy of CityBus to discourage, prevent, and prohibit any form of sexual harassment, including unsolicited sexual advances such as verbal comments, gestures, looks or physical contacts which are unwelcome and unwanted. Any employee who feels he or she is a victim of sexual harassment is urged to immediately report such action to his or her supervisor or to the Equal Opportunity Administrator for appropriate action. The Board of Directors approved CityBus' "Sexual Harassment Policy" on July 23, 1997. (Section IV)

## **C. Employment Practices**

Employment decisions involve recruitment, selection, placement, promotion, training, compensation and benefits, and disciplinary and termination actions. The Board of Directors approved CityBus' "Color, Religion, Gender, National Origin, Age, or Disability based Harassment Policy" on July 23, 1997. (Section V) Equal opportunity in employment shall be afforded to all persons – employee and applicant – without regard to race, color, religion, sex, age, national origin, ancestry, and physical or mental disability unrelated to performance.

### **1. Recruitment**

- A. When vacated, each position shall be reviewed to determine whether redefinition is necessary, and the job description reviewed to ensure that it clearly states the specific qualities desired as well as to remove employment barriers.
- B. All vacancies and new positions shall be filled on the basis of qualification and without regard to race, color, religion, sex, age, national origin, ancestry, physical or mental disability unrelated to performance.
- C. All recruitment shall be conducted in a manner that will afford equal opportunity to all employees and applicants.
- D. First consideration for filling all vacancies shall be given to qualified salaried employees.
- E. All current employees shall receive notice of position vacancies. Salaried employees shall have five working days in which to respond prior to outside advertisement. At the end of five working days, the CEO shall determine whether a salaried employee will be selected to fill that position.\*

*\*This policy does not apply to non-salaried employees. Although recruitment and hiring decisions for these positions are made without regard to race, color, religion, sex, age, national origin, ancestry, physical or mental disability unrelated to performance the recruitment procedure differs from that for salaried positions in that it is abbreviated, typically involves limited local advertisement, and is terminated once an individual qualified for the position is found. Therefore, non-salaried personnel applying for salaried positions shall be considered with outside applicants.*

If at that time no employee is selected, and the same position or one of similar level and job description has been advertised within the previous six-month period prior to the position becoming vacant, qualified candidates may be selected for interviews from among the applicants previously received. If no qualified candidates are available, CityBus shall advertise the position and accept applications from all persons.

- F. All openings for salaried positions that have not been filled by reassignment of salaried staff or by qualified outside candidates drawn from previous applicants as set forth above shall be advertised in area newspapers having broad circulation in the community as well as circulated among non-salaried staff. In addition to local area advertisement, openings for salaried Management and Planning positions may be advertised in appropriate publications and/or internet sites that may have state, regional, or national circulation. The CEO, and other appropriate staff, in consultation with the EOA shall make selection of publications used for advertisement. Factors to be considered in selecting publications for advertisement include the following: The amount of time reasonably available to fill the position and potential for qualified protected class applicants to reply.
- G. Notification of salaried employment opportunities may be placed with area public employment agencies, minority, and community organizations, and, when appropriate, with state and national organizations and institutions of higher education to encourage the referral of qualified protected class individuals.
- H. Contacts shall be maintained with area organizations for people with disabilities, minorities, and other community organizations to encourage the referral of qualified protected class individuals and shall include notification of employment opportunities.
- I. Contacts shall be maintained with state and area technical schools, colleges, and universities to encourage the referral of qualified persons and shall include the notification of employment opportunities.
- J. Development of and participation in planning and administrative internships and positions for protected class individuals shall be encouraged to the maximum extent possible within budget and program constraints.
- K. All advertisements for employment shall state that CityBus is an Equal Opportunity Employer (EOE).

**2. Selection, Placement, and Promotion**

- A. All selection, placement, and promotion decisions shall be made without regard to race, color, religion, sex, age, national origin, ancestry, physical or mental disability unrelated to performance.
- B. All persons shall be considered and selected solely on the merit of their qualifications for the position for which they have applied.
- C. All selection, placement, and promotion decisions shall afford equal opportunity to all persons.
- D. Any testing instrument which may be used in the selection, placement, and promotion of any employee shall be fully job related, equitable, and identical for all persons seeking the position.
- E. First consideration in selection, placement, and promotion decisions shall be given to qualified persons employed by CityBus.
- F. The qualifications of an employee shall be reviewed in accordance with the job description to ensure that all employees are equitably considered for promotion.
- G. All employees shall have access to the "Equal Opportunity Policies" which are contained in CityBus' "Employee Handbook" and "Staff Handbook."

**3. Training**

- A. All training decisions shall be made without regard to race, color, religion, sex, age, national origin, ancestry, and physical or mental disability unrelated to performance.
- B. All employees shall be encouraged to increase their skills and job potential through participation in training and education programs.
- C. Conferences, seminars and workshops shall be utilized to the maximum extent possible within budget and program constraints.
- D. Development of and participation in planning and administrative internships for all persons shall be encouraged to the maximum extent possible within budget and program constraints.
- E. All persons making training and internship decisions shall be instructed that equal opportunity is to be afforded to all persons.

**4. Compensation and Benefits**

- A. The compensation and benefits program shall be uniformly and equitably applied to all employees without regard to race, color, religion, sex, age, national origin, ancestry, physical or mental disability.

- B. All decisions concerning compensation shall be made in accordance with the guidelines contained in the "Salary Ranges" schedule.
- C. The opportunity for increased earnings and benefits shall be uniformly and equitably afforded to all persons.

#### **5. Disciplinary and Termination Actions**

- A. It is the desire and policy of CityBus to minimize or eliminate the necessity of taking disciplinary action against its employees. All effort shall be exerted toward this end including counseling and communication of policy. If an employee is in doubt as to whether any action he/she may make is in violation of CityBus' rules and practices, the individual's supervisor or the Human Resources Administrator should be consulted.
- B. Any disciplinary action against any employee shall be for good and sufficient cause as it affects work performance and effectiveness within the organization and shall be without regard to race, color, religion, sex, age, national origin, ancestry, physical or mental disability unrelated to performance and shall be consistent with CityBus handbooks.

#### **D. Equal Opportunity Clause**

Every contract to which CityBus is a party shall contain, either verbatim or by reference, the equal opportunity clause, or its appropriate equivalent.

### **III. EQUAL EMPLOYMENT OPPORTUNITY POLICY**

This Equal Employment Opportunity Policy reaffirms the policy and commitment of Greater Lafayette Public Transportation Corporation (GLPTC) to provide equal employment opportunities for all employees and job applicants. GLPTC endorses and will follow our Equal Employment Opportunity Policy in implementing all employment practices, policies, and procedures.

It Is the Policy of GLPTC to recruit, hire, train, and promote persons in all job titles without regard to race, color, religion, national origin, sex, sexual orientation, age (except where sex or age is a bona-fide occupation qualification, as defined by law), or physical or mental disability (except where the disability prevents the individual from being able to perform the essential functions of the job and cannot be reasonably accommodated in full compliance with the law). In compliance with this policy and in furtherance of the principle of equal employment opportunity, GLPTC will administer all personnel decisions and actions, including but not limited to recruiting, hiring, compensation, benefits, transfers, promotions, demotions, layoffs, returns from layoff, terminations, GLPTC sponsored training, education tuition assistance, and social and recreation programs, without regard to race, color, religion, sex, age, national origin, or disability, except as noted above.

Any employee who believes that any form of prohibited discrimination, harassment, or intimidation has or is taking place should contact the Human Resources Administrator either in



writing or in person at 1250 Canal Road, Lafayette, IN 47904; Phone 765/423-2666, Fax 765/742-4729 or email [hr@gocitybus.com](mailto:hr@gocitybus.com). Employees and applicants for employment are protected from coercion, intimidation, interference, or discrimination for filing a complaint or assisting in an investigation. Any employee found to have engaged in such prohibited discrimination, harassment, or intimidation will be subject to disciplinary action up to and including discharge.

All employees are expected to comply with our Equal Employment Opportunity Policy. Managers and supervisors who are responsible for meeting GLPTC objectives are expected to cooperate fully in meeting our equal employment opportunity objectives and their overall performance will be evaluated accordingly.

Adopted by GLPTC Board of Directors on July 23, 1997(changed March 5, 2001)

#### **IV. SEXUAL HARASSMENT POLICY**

It is the policy of Greater Lafayette Public Transportation Corporation (GLPTC) to provide a work environment free from sexual and sex-based harassment. It is against the policy of GLPTC for any employee, whether a manager, supervisor, or co-worker, to sexually harass another employee or any passenger or prospective passenger of GLPTC.

Sexual harassment or sex-based harassment occurs when:

- ◆ Submission to unwelcome conduct of a sexual nature becomes an implicit or explicit condition of an employee's continued employment.
- ◆ Submission to or rejection of unwelcome conduct of a sexual nature affects other employment decisions regarding the employee; or
- ◆ Unwelcome conduct of a sexual nature creates an intimidating, hostile, or offensive working environment, whether for other employees or for passengers or prospective passengers of GLPTC.

Some examples of sexual and sex-based harassment are:

- ◆ Unwanted physical contact, including touching, pinching or brushing the body;
- ◆ Verbal harassment, such as sexual innuendoes, suggestive comments, jokes of a sexual nature, comments about gender-specific traits, sexual propositions, insults, threats, or demeaning unprofessional references to females (for example, honey, dear, girls, little lady, etc.);
- ◆ Non-verbal conduct, such as display of sexually suggestive objects or pictures, leering, whistling, or obscene gestures; and
- ◆ Acts of physical aggression, intimidation hostility, threats, or unequal treatment based on sex (even if not sexual in nature).

GLPTC realizes that employees may sometimes develop mutually agreeable relationships that could meet the definition of sexual harassment except for the consent of the people involved. However, where such relationships occur between employees of unequal power or authority, there is a serious concern about whether the person with lesser power or authority really has consented to the relationship. In cases where the accused harasser claims the accuser consented to the conduct and

the accused is in a position of greater power or authority (such as a supervisor of the accuser), GLPTC will question whether the accuser has in fact consented to the conduct giving rise to the complaint.

Any employee who believes he or she has been sexually harassed or who observes conduct he or she believes may be sexual harassment of a passenger or prospective passenger should:

- 1) Document the occurrence(s) of sexual harassment, including the names of any other individuals who have observed or have specific knowledge of the incident(s). Failure to do this step does not prevent the employee from doing Items (2) and (3) below.
- 2) If the employee is the person harassed, make it clear to the harasser that the conduct in question is unacceptable and unwelcome. Failure to do this step does not prevent the employee from doing items (1) and (3).
- 3) Report the conduct immediately to the incident investigator. The incident investigator will normally be the Human Resources Administrator. However, if the Human Resources Administrator is the object of the complaint, the incident investigator shall be the CFO, and if she/he is the object of the complaint, the incident investigator shall be the CEO. In the event the CEO is the object of the complaint, the complaint shall be made directly to the Chair of the Board of Directors of GLPTC, who shall be the incident investigator. The incident investigator shall make a thorough and impartial investigation of all complaints in a timely manner and report the results of his/her investigation to the person or body making the final determination. The CEO will make the final determination; however, if the CEO is the object of the complaint, the report shall be made to a quorum of the Board for final determination. The person or body making the final determination may conduct or direct additional investigation as she/he or it deems appropriate. Any person determined by the CEO or the Board to have sexually harassed another employee, passenger, or prospective passenger in violation of this policy, will be subject to disciplinary action in accordance with the GLPTC progressive discipline schedule, if she/he is subject to such schedule, or, if not subject to such schedule, such other discipline as the person or body making the determination deems appropriate, up to and including termination.

Retaliating or discriminating against an employee for complaining about harassment is prohibited. GLPTC strongly disapproves of harassment, will not condone, or tolerate harassment, and will take reasonable steps necessary to discourage sexual harassment. GLPTC also recognizes that false accusations of sexual harassment can have serious effects on innocent men and women. GLPTC trusts that all employees will continue to act in a responsible and professional manner to establish a pleasant working environment free from discrimination.

Adopted by GLPTC Board of Directors on July 23, 1997

## **V. RACE, COLOR, RELIGION, GENDER, SEXUAL ORIENTATION, NATIONAL ORIGIN, AGE, OR DISABILITY BASED HARASSMENT POLICY**

It is the policy of Greater Lafayette Public Transportation Corporation (GLPTC) to provide a work environment free from discrimination, including harassment on the basis of race, color, religion, gender, sexual orientation, national origin, age, and disability. It is against the policy of GLPTC for

any employee, whether a manager, supervisor, or co-worker, to harass another employee or any passenger or prospective passenger of GLPTC. Prohibited harassment occurs when verbal or physical conduct:

- ♦ Defames or shows hostility toward an individual because of his or her race, color, religion, gender, national origin, age or disability, or that of the individual's relatives, friends, or associates;
- ♦ Creates or is intended to create an intimidating, hostile, or offensive working environment;
- ♦ Interferes or is intended to interfere with another employee's work performance or otherwise adversely affects the employee's employment opportunities.

Harassing conduct includes, but is not limited to:

- ♦ Epithets, slurs, negative stereotyping, or threatening, intimidating or hostile acts, which relate to race, color, religion, gender, national origin, age or disability;
- ♦ Written or graphic material that defames or shows hostility or aversion toward an individual or group because of race, color, religion, gender, national origin, age, or disability and that is placed on walls, bulletin boards, or elsewhere on the GLPTC's premises, or that is circulated in the workplace.

Any employee who believes he or she has been harassed in violation of this policy or who observes conduct he or she believes may be harassment of a passenger or prospective passenger in violation of this policy should:

1. Document the occurrence(s) of harassment, including the names of any other individuals who have observed or have specific knowledge of the incident(s). Failure to do this step does not prevent the employee from doing items (2) and (3) below.
2. If the employee is the person harassed, make it clear to the harasser that the conduct in question is unacceptable and unwelcome, if the person harassed believes it safe to do so. Failure to do this step does not prevent the employee from doing items (1) and (3).
3. Report the conduct immediately to the incident investigator. The incident investigator will normally be the Human Resources Administrator. However, if the Human Resources Administrator is the object of the complaint, the incident investigator shall be the CFO, and if she/he is the object of the complaint, the incident investigator shall be the CEO. In the event the CEO is the object of the complaint, the complaint shall be made directly to the Chair of the Board of Directors of GLPTC, who shall be the incident investigator.

The incident investigator shall make a thorough and impartial investigation of all complaints in a timely manner and report the results of his/her investigation to the person or body making the final determination. The CEO will make the final determination; however, if the CEO is the object of the complaint, the report shall be made to a quorum of the Board for final determination. The person or body making the final determination may conduct or direct additional investigation as she/he or it deems appropriate.

Any person determined by the CEO or the Board to have sexually harassed another employee, passenger, or prospective passenger in violation of this policy, will be subject to disciplinary action in accordance with the GLPTC progressive discipline schedule, if she/he is subject to such schedule,

or, if not subject to such schedule, such other discipline as the person or body making the determination deems appropriate, up to and including termination.

Retaliating or discriminating against an employee for complaining about harassment is prohibited. GLPTC strongly disapproves of harassment, will not condone, or tolerate harassment, and will take reasonable steps necessary to discourage harassment that is in violation of this policy.

Adopted by GLPTC Board of Directors on July 23, 1997(changed March 5, 2001)

## **VI. EQUAL EMPLOYMENT OPPORTUNITY COMPLAINT PROCEDURE**

It is the policy of CityBus that any person who believed that he or she, individually or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin may file a written complaint with the Corporation. If the complainant is dissatisfied with the resolution or the case is not being resolved in a timely manner, the complaint maybe submitted to the FTA, The Secretary EEOC, or a state agency for investigation. A complaint must be filed within 180 days. It is CityBus' intent to attempt to resolve all complaints at the Corporation level.

### **A. Filing Complaints of Discrimination**

Details for filing complaints of discrimination are explained in Sections III, IV, and V.

## **VII. EQUAL OPPORTUNITY ADMINISTRATOR (EOA)**

The EOA has the overall responsibility for overseeing the development and implementation of the Affirmative Action Program (AAP) and for purposes of the document will be referred to as the EOA. The EOA's responsibilities fall into two (2) general areas: first, equal employment opportunity, and second, contract compliance.

### **A. Some of the Duties of the EOA Are:**

1. To develop, direct, and monitor implementation of, and provide continuing evaluation of the CityBus Equal Opportunity Program. This will include maintaining relevant statistics on minorities and women in the external labor force and within CityBus. In developing the AAP, the EOA will coordinate with other staff members as necessary.
2. To provide assistance to departments and divisions in resolving specific problems related to implementation of the AAP and achievement of stated goals and timetables.
3. To advise the CEO, and other appropriate personnel, of the most recent laws, regulations and guidelines from federal and state agencies as they affect equal employment opportunity and affirmative action within CityBus.

4. To maintain liaisons with the appropriate enforcement agencies at the federal and state levels and to ensure timely submission of civil rights and equal employment opportunity reports required by the U.S. Department of Transportation, Equal Employment Opportunity Commission, Officer of Federal Contract Compliance programs and others.
5. To maintain liaisons with minority and women's organizations, agencies concerned with employment of persons with disabilities, individuals who are older and other community groups.
6. To consult with and provide assistance to the administrative staff regarding all aspects of personnel procedures and employee relations practices, including those which appear neutral but, in fact, may have a disparate impact on minorities, women and disabled employees and applicants for employment.
7. To participate in orientation of new employees and other employee relations workshops for the purpose of explaining CityBus' Equal Employment Opportunity Policy and affirmative action efforts to counsel an employee on matters related to equal employment opportunity.
8. To review appointment, promotion, terminations, and other data pertinent to effective implementation of CityBus' AAP.
9. To advise prospective contractors and others on necessary steps to bring them into compliance with CityBus' requirements regarding equal employment opportunity.
10. To provide for and conduct compliance reviews deemed necessary to ensure effective program implementation.
11. To report periodically to the CEO on progress being made in the implementation of the AAP and to recommend program modifications.

## **VIII. EEO STAFF RESPONSIBILITY**

All administrative and supervisory personnel share the responsibility for ensuring the effectiveness of the Corporation's AAP and are evaluated on their performance in this area. They are expected to give their full cooperation and active support of the Affirmative Action Program to the CEO and the EOA.

### **A. Among the Specific Requirements of Administrative and Supervisory Personnel Are:**

1. To assist in identifying qualified minority, female and disabled candidates for vacancies or new positions within the CityBus work force.

2. To ensure equal employment opportunity for all employees and applicants for employment under his/her direct or indirect supervision with regard to training, work assignments, promotional evaluations, transfers, classification, compensation, assignment, of overtime and additional duties and all other terms and conditions of employment.
3. To establish employment goals and timetables in the form prescribed by the EOA and to prepare semi- annual reviews of his/her unit's performance against established goals and make recommendations for revisions of the AAP.
4. To ensure that compliant procedures are strictly adhered to without retaliation against any person filing a grievance or a formal discrimination complaint or against any person giving testimony or aiding in the resolution of such a complaint.

## **IX. DISSEMINATION OF THE EEO PROGRAM – INTERNALLY**

1. Management and supervisory personnel will be fully informed of the Corporation's Affirmative Action Program and will be forwarded a copy of the Plan Document for Equal Employment Opportunity.
2. A copy of the Corporation's Policy Statement will be posted on Corporation Bulletin Boards.
3. At Staff meetings, discussion of the program, review of individual responsibilities and progress will occur.
4. Management and supervisory personnel will be informed that their performance on Affirmative Action goals will be rated along with other criteria in evaluating their overall performance with respect to promotions and merit increases.
5. Any educational materials concerning the AAP will be made available to all management and supervisory personnel.
6. The EOA will disseminate articles and written publications to management and supervisory personnel to inform them of legal requirements affecting the operations of the Corporation.
7. Attendance at seminars, workshops, and training sessions by the EOA, management, and first-line supervisory personnel giving instruction concerning the AAP will be encouraged.

## **X. DISSEMINATION OF THE EEO PROGRAM – EXTERNALLY**

The Corporation's Affirmative Action Program for Equal Employment Opportunity will be disseminated to the community at large as follows:

1. Recruiting sources will be informed in writing that CityBus is an Equal Opportunity Employer.
2. Written and personal contacts will be made with minority and women's organizations, community agencies and leaders, news media, high schools and colleges to inform them that CityBus is an Equal Opportunity Employer and encourage the application of minorities, women, persons with disabilities and other protected class members.
3. All advertisements contain the statement, "An Equal Opportunity Employer (EOE)."
4. The Corporation informs agencies such as Indiana Workforce Development and minority organizations of job openings and qualifications.

## **XI. AFFIRMATIVE ACTION PROGRAM - UTILIZATION ANALYSIS**

The purpose of the utilization analysis is to identify those job categories where there is an underutilization and/or concentration of minorities and women in relation to their availability in the relevant labor market. It is also to establish the framework for goals and timetables and other affirmative actions to correct employment practices that contributed to any identified absence, underutilization, or concentration.

The utilization analysis consists of a workforce analysis (Table I) and an availability analysis (Table II and Table III).

### **A. Workforce Analysis**

The workforce analysis shows a statistical breakdown of CityBus' workforce by job category (officials/administrators, office and clerical, skilled craft and transit operatives). Each of the above is cross-referenced by race, national origin and sex. For purposes of this program, the job descriptions are defined as follows:

#### **1. Officials and Administrators**

Occupations in which employees set broad policies, exercise overall responsibility for execution of these policies, or direct individual departments or special phases of the agency's operations, or provide specialized consultation on a regional, district or area basis. Within the CityBus organization, these positions include, but are not limited to: CEO, Operations Manager, Fleet Manager, Manager of Customer Experience, CFO,

Assistant Controller, and Assistant Manager of Maintenance.

## **2. Office and Clerical**

Occupations in which workers are responsible for internal and external communications, recording and retrieval of data and/or information and other paperwork required in an office. Within the CityBus organization, these positions include, without limitation: Finance Specialists, Administrative Assistant, and Customer Service Representative.

## **3. Skilled Craft Workers**

Occupations in which workers perform jobs which require special manual skills and a thorough and comprehensive knowledge of the processes involved in the work which is acquired through on-the-job training and experience or through apprenticeship or other formal training programs. At CityBus this includes, without limitation: Lead, A, B, and C Mechanics.

## **4. Transit Operatives**

Occupations in which workers perform duties which result in or contribute to the comfort, convenience, hygiene or safety of the general public or which contribute to the upkeep and care of buildings, facilities or grounds of public property. Workers in this group may operate machinery. Within the CityBus organization, this includes, without limitation: Bus Operators, Shop Utility Personnel and Maintenance Cleaners.

The workforce analysis of CityBus employees is based on the transit system employment records as of January 2022. At that time, a total of 136 persons were employed in four job categories: Officials and Administrators, Office and Clerical, Skilled Labor, and Transit Operatives.

### **B. Availability Analysis**

Employment profiles of the Lafayette area by race and sex is shown in Table II. These figures were based on the most current Indiana Workforce Development data available. It is accepted by CityBus that this statistical profile of the Lafayette area represents the pool of employees from which CityBus can recruit for employment.

### **C. Utilization Comparison**

Table III displays a comparison of the labor force participation rate of historically underutilized persons in the Lafayette area with the CityBus employee profile. These groups have been identified for the purpose of developing goals and timetables for the potential employment of persons within these groups, so that the CityBus workforce compares with the Lafayette area's available workforce.

### **D. Utilization Analysis**

A utilization analysis compares the workforce of CityBus to the available workforce of the community. The utilization analysis in Table III is comprised of three parts: The Workforce Analysis, the Availability Analysis, and the Utilization Comparison. The Workforce Analysis describes the composition of the workforce by sex and race and the functional relationship of



persons currently employed by CityBus. The Availability Analysis provides a statistical profile of the Lafayette area labor force from which CityBus recruits its employees. The third element is a comparison of the workforce profile with the availability of minorities and women in the area's labor market.

TABLE I

**CityBus**  
**WORKFORCE ANALYSIS**  
**NUMBER OF EMPLOYEES IN VARIOUS EMPLOYMENT POSITIONS**

	Job Categories	White	African American	Hispanic	Native Hawaii/ Pacific Islander	Asian	Native American/ Alaska Native	Two or More	Combined
MALE	Officials and Administrators	8	1	1	0	0	0	0	10
	Skilled Craft	11	0	1	0	0	0	0	12
	Transit Bus Operatives	43	15	6	0	0	0	1	65
	Office and Clerical	1	0	0	0	0	0	0	1
	Total	63	16	8	0	0	0	1	88
	% of Total per Sex	71.6%	18.2%	9.1%	0.0%	0.0%	0.0%	1.1%	100.0%
	% of Total of Both Sexes	43.4%	11.0%	5.5%	0.0%	0.0%	0.0%	0.7%	60.7%
FEMALE	Officials and Administrators	4	0	0	0	1	0	0	5
	Skilled Craft	0	0	0	0	0	0	0	0
	Transit Bus Operatives	31	11	1	0	0	0	1	44
	Office and Clerical	7	1	0	0	0	0	0	8
	Total	42	12	1	0	1	0	1	57
	% of Total per Sex	73.7%	21.1%	1.8%	0.0%	1.8%	0.0%	1.8%	100.0%
	% of Total of Both Sexes	29.0%	8.3%	0.7%	0.0%	0.7%	0.0%	0.7%	39.3%

TABLE II

**EMPLOYMENT STATUS BY SEX AND MINORITY STATUS**

LAFAYETTE, IN METRO AREA - 2010 CENSUS DATA

STATUS	POPULATION	EMPLOYED	UNEMPLOYED	RATE EMPLOYED
TOTAL	165,607	148,410	17,197	<b>89.6%</b>
White	143,574	131,562	12,012	<b>79.4%</b>
Black/African American	4,789	4,020	769	<b>2.4%</b>
Asian	9,184	6,258	2,926	<b>3.8%</b>
Some Other Race	2,532	2,144	388	<b>1.3%</b>
Two or More Races	2,136	1,689	447	<b>1.0%</b>
Two or More Races with Some Other Race	369	269	100	<b>0.2%</b>
Two or More Races without Some Other Race	1,583	1,299	284	<b>0.8%</b>
White; Black/African American	293	289	4	<b>0.2%</b>
White/American Indian/Alaska Native	692	526	166	<b>0.3%</b>
White/Asian	455	354	101	<b>0.2%</b>

VERTICAL % DISTRIBUTION	
EMPLOYED	UNEMPLOYED
<b>89.6%</b>	10.4%
<b>79.4%</b>	7.3%
<b>2.4%</b>	0.5%
<b>3.8%</b>	1.8%
<b>1.3%</b>	0.2%
<b>1.0%</b>	0.3%
<b>0.2%</b>	0.1%
<b>0.8%</b>	0.2%
<b>0.2%</b>	0.0%
<b>0.3%</b>	0.1%
<b>0.2%</b>	0.1%

<b>FEMALE</b>	81,589	70,814	10,775	86.8%
White	71,503	63,514	7,989	77.8%
Black/African American	2,486	2,152	334	2.6%
Asian	3,616	2,246	1,370	2.8%
Some Other Race	989	704	285	0.9%
Two or More Races	1,158	840	318	1.0%
Two or More Races with Some Other Race	159	77	82	0.1%
Two or More Races without Some Other Race	883	678	205	0.8%
White; Black/African American	142	142	0	0.2%
White/American Indian/Alaska Native	377	258	119	0.3%
White/Asian	276	203	73	0.2%

<b>86.8%</b>	13.2%
<b>77.8%</b>	9.8%
<b>2.6%</b>	0.4%
<b>2.8%</b>	1.7%
<b>0.9%</b>	0.3%
<b>1.0%</b>	0.4%
<b>0.1%</b>	0.1%
<b>0.8%</b>	0.3%
<b>0.2%</b>	0.0%
<b>0.3%</b>	0.1%
<b>0.2%</b>	0.1%

<b>MALE</b>	84,018	77,596	6,422	92.4%
White	72,071	68,048	4,023	81.0%
Black/African American	2,303	1,868	435	2.2%
Asian	5,568	4,012	1,556	4.8%
Some Other Race	1,543	1,440	103	1.7%
Two or More Races	978	849	129	1.0%
Two or More Races with Some Other Race	210	192	18	0.2%
Two or More Races without Some Other Race	700	621	79	0.7%
White; Black/African American	151	147	4	0.2%
White/American Indian/Alaska Native	315	268	47	0.3%
White/Asian	179	151	28	0.2%

<b>92.4%</b>	7.6%
<b>81.0%</b>	4.8%
<b>2.2%</b>	0.5%
<b>4.8%</b>	1.9%
<b>1.7%</b>	0.1%
<b>1.0%</b>	0.2%
<b>0.2%</b>	0.0%
<b>0.7%</b>	0.1%
<b>0.2%</b>	0.0%
<b>0.3%</b>	0.1%
<b>0.2%</b>	0.0%

TABLE III

**CityBus**  
UTILIZATION COMPARISON

Job Categories	Total Number Employed	Work Force Analysis		Availability Analysis		Utilization Comparison		2018 Utilization Comparison	
		% Minority	% Female	% Minority	% Female	Underutilized % Minority (Yes/No)	Underutilized % Female (Yes/No)	Underutilized % Minority (Yes/No)	Underutilized % Female (Yes/No)
Officials and Administrators	15	20.0%	33.3%	*	*	<b>NO</b>	YES	YES	YES
Skilled Craft	12	8.3%	0.0%	*	*	YES	YES	NO	NO
Transit Bus Operatives	109	32.1%	40.4%	*	*	<b>NO</b>	<b>NO</b>	NO	YES
Office and Clerical	9	11.1%	88.9%	*	*	YES	<b>NO</b>	YES	YES
Total	145	27.6%	39.3%	13.3%	49.3%	<b>NO</b>	YES	NO	YES

\* Labor Pool figures of availability could not be obtained by job category.

## **XII. AFFIRMATIVE ACTION PROGRAM – GOALS AND TIMETABLES**

This plan contains short and long range goals and timetables. The short-range goals are set for one year and will be reestablished annually. The long-range goals are established for a period of up to four years. The long-range goals and the objective of this program is to have the Greater Lafayette Public Transportation Corporation (GLPTC) job group population approximate the availability of the civilian labor force of the GLPTC labor area. Annually, on or about June 30 of each year, the EOA and the CEO will establish goals for the next year.

### **A. Long Range Goals**

The long-range goals for GLPTC are as follows:

1. Actively recruit minority and female candidates for skilled craft positions so that their job representation will reflect area population percentages.
2. Actively recruit minority and female candidates when a vacancy occurs in the Officials and Administrators category so that their job representation will reflect area population percentages.
3. Actively recruit minority candidates when a vacancy occurs in the Office and Clerical category so that their job representation will reflect area population percentages.
4. Continue to increase employment percentages for female employees in the following category: Transit bus operatives.

### **B. Short Range Goals**

The short-range goals for GLPTC are as follows:

1. Hire one minority/female employee in a skilled craft position if and when a vacancy occurs.
2. Hire one minority employee in an Office and Clerical position if and when a vacancy occurs.
3. Maintain minority employee percentages in the Transit Operatives job category.
4. Update the Transit Operative employment application to include a voluntary demographic questionnaire.

### **XIII. AFFIRMATIVE ACTION PROGRAM-ASSESSMENT OF EMPLOYMENT PRACTICES TO IDENTIFY CAUSES OF UNDER-UTILIZATION: AFFIRMATIVE ACTION TO REMEDY PROBLEM AREAS**

#### **A. Employment Practices**

Recruitment, selection, placement, promotion, training, compensation, benefits, disciplinary and termination practices are described in detail in Section II.C. Employment practices of Officials and Administrators, and Clerical Employees are established by job levels and individual employee performance. A formal performance appraisal system is used. The use of this system has not shown any pattern of bias or discrimination.

All other employees not listed above are represented by the Amalgamated Transit Union (ATU) Local No. 1741. These employees represent approximately 85% of the CityBus labor force. The use of ATU representation has not shown any pattern of bias or discrimination.

#### **B. External Factors**

Because of the low percentage of Hispanics and other foreign speaking persons in the community, language is not considered a barrier.

1. CityBus will make promotion decisions in accordance with the policies and principles embodied in this Plan.
2. CityBus will administer personnel actions affecting employees in areas such as compensation, benefits, transfers, layoffs, returns from layoff, company-sponsored training, education, tuition assistance and social and recreational programs without regard to race, color, religion, sex or national origin. CityBus will periodically review personnel actions and will collect data on a continuing basis for the purpose of monitoring such actions.
3. CityBus promulgates and administers the company's employee benefit plans, including retirement, pension, disability and insurance benefits, in a nondiscriminatory manner consistent with FTA regulations and other federal equal employment laws.
4. CityBus staff will meet periodically with management to review the EEO progress made and to develop necessary program steps should they be required.
5. Performance by CityBus staff and managers will be evaluated on the success of the EEO program the same way as their performance on other system goals.

### **XIV. AFFIRMATIVE ACTION PROGRAM-MONITORING AND REPORTING SYSTEM**

1. **Semi-Annual Reporting.** The EOA will prepare an annual report showing the

number of hires, promotions, transfers, resignations, terminations and retirements for the preceding six months. This data will be displayed by race, sex and job category.

2. **EEO Program Evaluation and Annual Report.** Annually, the EOA will prepare a summary of the progress made over the preceding twelve months. Assessments and corrective action will be made at this time if necessary. An annual report to the CEO will be prepared from the semiannual reports, which will include an evaluation of the EEO/AA Program.
3. **Goal Assessment.** The evaluation process will highlight the goals that were accomplished as well as pinpoint those goals which CityBus failed to achieve within the timetables that were set. The evaluation process will allow the CEO and the EOA to amend and reset the existing goals as well as identify other areas of underutilization and develop new goals with timetables to remedy these deficiencies.
4. **Applicant Flow Analysis.** The EOA will revise the current prospective hire application form to include voluntary questionnaires regarding gender and race. These findings will be recorded in the database for future projections and be included in the annual report to the CEO.
5. **Data Base for Future Projections.** The measures outlined above will provide an ongoing updated database for developing future projections and measuring results over time.

# **GREATER LAFAYETTE PUBLIC TRANSPORTATION CORPORATION**

## **EQUAL EMPLOYMENT OPPORTUNITY AFFIRMATIVE ACTION PROGRAM**

ADOPTED BY: JUNE 28, 2000  
LAST UPDATED: JULY 10, 2023

SOURCE: FTA CIRCULAR 4704.1



# **I. GREATER LAFAYETTE PUBLIC TRANSPORTATION CORPORATION EQUAL EMPLOYMENT OPPORTUNITY STATEMENT OF POLICY**

## **Purpose**

To provide a policy of non-discrimination to assure that equal opportunity shall be afforded to all persons.

## **Statement**

Specifically, it is the policy of the Greater Lafayette Public Transportation Corporation dba "CityBus" that all terms and conditions of employment including, but not necessarily limited to recruitment, appointment, promotion, compensation, benefits, transfers, training and educational opportunities, will be administered without regard to race, color, religion, sex, sexual orientation, national origin or ancestry, age or mental or physical disability, provided said disability does not inhibit essential job performance. Further, it is CityBus' intent to comply with appropriate federal and state laws, rules, and regulations and to give special attention to increasing the participation of minorities, women, and disabled persons in all facets of the Corporation's activities.

The responsibility for the implementation of the Equal Opportunity Employment Program rests with the ~~Operations Manager/Manager of~~ Human Resources Administrator. All Management personnel share a responsibility to assure compliance. The performance by managers, supervisors, etc. will be evaluated on the success of the EEO Program just as it is in achieving other CityBus goals.

Applicants and employees have the right to file complaints of alleged discrimination with the ~~Operations Manager/Manager of~~ Human Resources Administrator at 1250 Canal Road, Lafayette, IN 47904; Phone: 765/423-2666; Fax 765/742-4729 and e-mail [jconnellhr@gocitybus.com](mailto:jconnellhr@gocitybus.com). Achievement of EEO goals will provide benefits to CityBus through fuller utilization and development of previously underutilized human resources.

## **II. INTRODUCTION**

Equal opportunity is a broad objective involving more than the statement of policy. It is the objective of these "Equal Opportunity Policies" to establish a philosophy and procedure for ensuring equality of opportunity in employment, services, and contractual practices. The Board of Directors approved CityBus' "Equal Employment Opportunity Policy" on July 23, 1997. (Section III)

### **A. Equal Opportunity Administrator**

The ~~General Manager-CEO~~ shall designate the ~~Operations Manager-Human Resources~~ Administrator to administer the Equal Opportunity Program, including preparation of an

workforce analysis and affirmative action plan. This person shall be responsible for creating and maintaining an atmosphere of equality of opportunity in employment, services, and contractual practices among employees and the community. The essential requirements of the position are:

1. Sensitivity to, and an awareness of, the varied ways in which discrimination occurs;
2. Total commitment to EEO/AA program goals and objectives;
3. Knowledge of civil rights precepts, policies, rules, regulations and guidelines; and
4. Sufficient authority and ability to work and communicate with others (e.g., department heads) to achieve EEO/AA goals and objectives.  
Specifically, the Equal Opportunity Administrator (EOA) is charged with the following:
  - A. Keeping familiar with the equal opportunity guidelines and standards of federal and state agencies as may be necessary.
  - B. Analyzing and evaluating work force, employment, and contractual practices to determine underutilization and preparing an "Affirmative Action Analysis and Plan" for CityBus in accordance with the guidelines and standards of federal and state agencies as may be necessary.
  - C. Reviewing all changes in the "Employee Handbook" and "Staff Handbook" to ascertain whether they directly or indirectly have the effect of denying equal opportunity in employment and promotion to any person.
  - D. Maintaining an up-to-date list of public employment agencies, human resource and community organizations, nationally circulated planning and management employment publications, and area newspapers having a broad circulation in the community to be contacted in the recruitment of qualified persons in accordance with the Affirmative Action Plan.
  - E. Initiating and coordinating the internal and external dissemination of CityBus' current policy resolution on equal opportunity and affirmative action to all employees and the community.
  - F. Serving as a liaison between CityBus employees, minority organizations, referral sources, contracting organizations, and federal and state agencies in equal opportunity issues.
  - G. Providing in-service sessions, as applicable to those staff in hiring positions, in an effort to promote sensitivity to the philosophy of equal opportunity.
  - H. Establishing personal contact with appropriate organizations in order to strengthen recruitment of protected class individuals.

- I. Reevaluating promotion, training, hiring, termination and disciplinary action criteria of all persons on staff to determine if discrimination occurs in any of these cases.
- J. Maintaining contact with minority organizations to increase their knowledge regarding potential CityBus contracts in an attempt to ensure that contracts let by CityBus to minorities will approximate their representation in the population of the area.

## **B. Sexual Harassment**

It is the policy of CityBus to discourage, prevent, and prohibit any form of sexual harassment, including unsolicited sexual advances such as verbal comments, gestures, looks or physical contacts which are unwelcome and unwanted. Any employee who feels he or she is a victim of sexual harassment is urged to immediately report such action to his or her supervisor or to the Equal Opportunity Administrator for appropriate action. The Board of Directors approved CityBus' "Sexual Harassment Policy" on July 23, 1997. (Section IV)

## **C. Employment Practices**

Employment decisions involve recruitment, selection, placement, promotion, training, compensation and benefits, and disciplinary and termination actions. The Board of Directors approved CityBus' "Color, Religion, Gender, National Origin, Age, or Disability based Harassment Policy" on July 23, 1997. (Section V) Equal opportunity in employment shall be afforded to all persons – employee and applicant – without regard to race, color, religion, sex, age, national origin, ancestry, and physical or mental disability unrelated to performance.

### **1. Recruitment**

- A. When vacated, each position shall be reviewed to determine whether redefinition is necessary, and the job description reviewed to ensure that it clearly states the specific qualities desired as well as to remove employment barriers.
- B. All vacancies and new positions shall be filled on the basis of qualification and without regard to race, color, religion, sex, age, national origin, ancestry, physical or mental disability unrelated to performance.
- C. All recruitment shall be conducted in a manner that will afford equal opportunity to all employees and applicants.
- D. First consideration for filling all vacancies shall be given to qualified salaried employees.
- E. All current employees shall receive notice of position vacancies. Salaried employees shall have five working days in which to respond prior to outside advertisement. At the end of five working days, the ~~General Manager~~ CEO

shall determine whether a salaried employee will be selected to fill that position.\*

*\*This policy does not apply to non-salaried employees. Although recruitment and hiring decisions for these positions are made without regard to race, color, religion, sex, age, national origin, ancestry, physical or mental disability unrelated to performance the recruitment procedure differs from that for salaried positions in that it is abbreviated, typically involves limited local advertisement, and is terminated once an individual qualified for the position is found. Therefore, non-salaried personnel applying for salaried positions shall be considered with outside applicants.*

If at that time no employee is selected, and the same position or one of similar level and job description has been advertised within the previous six-month period prior to the position becoming vacant, qualified candidates may be selected for interviews from among the applicants previously received. If no qualified candidates are available, CityBus shall advertise the position and accept applications from all persons.

- F. All openings for salaried positions that have not been filled by reassignment of salaried staff or by qualified outside candidates drawn from previous applicants as set forth above shall be advertised in area newspapers having broad circulation in the community as well as circulated among non-salaried staff. In addition to local area advertisement, openings for salaried Management and Planning positions may be advertised in appropriate publications and/or internet sites that may have state, regional, or national circulation. The ~~General Manager~~ CEO, and other appropriate staff, in consultation with the EOA shall make selection of publications used for advertisement. Factors to be considered in selecting publications for advertisement include the following: The amount of time reasonably available to fill the position and potential for qualified protected class applicants to reply.
- G. Notification of salaried employment opportunities may be placed with area public employment agencies, minority, and community organizations, and, when appropriate, with state and national organizations and institutions of higher education to encourage the referral of qualified protected class individuals.
- H. Contacts shall be maintained with area organizations for people with disabilities, minorities, and other community organizations to encourage the referral of qualified protected class individuals and shall include notification of employment opportunities.
- I. Contacts shall be maintained with state and area technical schools, colleges, and universities to encourage the referral of qualified persons and shall include the notification of employment opportunities.
- J. Development of and participation in planning and administrative internships and positions for protected class individuals shall be encouraged to the maximum extent possible within budget and program constraints.

- K. All advertisements for employment shall state that CityBus is an Equal Opportunity Employer (EOE).

## **2. Selection, Placement, and Promotion**

- A. All selection, placement, and promotion decisions shall be made without regard to race, color, religion, sex, age, national origin, ancestry, physical or mental disability unrelated to performance.
- B. All persons shall be considered and selected solely on the merit of their qualifications for the position for which they have applied.
- C. All selection, placement, and promotion decisions shall afford equal opportunity to all persons.
- D. Any testing instrument which may be used in the selection, placement, and promotion of any employee shall be fully job related, equitable, and identical for all persons seeking the position.
- E. First consideration in selection, placement, and promotion decisions shall be given to qualified persons employed by CityBus.
- F. The qualifications of an employee shall be reviewed in accordance with the job description to ensure that all employees are equitably considered for promotion.
- G. All employees shall have access to the "Equal Opportunity Policies" which are contained in CityBus' "Employee Handbook" and "Staff Handbook."

## **3. Training**

- A. All training decisions shall be made without regard to race, color, religion, sex, age, national origin, ancestry, and physical or mental disability unrelated to performance.
- B. All employees shall be encouraged to increase their skills and job potential through participation in training and education programs.
- C. Conferences, seminars and workshops shall be utilized to the maximum extent possible within budget and program constraints.
- D. Development of and participation in planning and administrative internships for all persons shall be encouraged to the maximum extent possible within budget and program constraints.
- E. All persons making training and internship decisions shall be instructed that equal opportunity is to be afforded to all persons.

## **4. Compensation and Benefits**

- A. The compensation and benefits program shall be uniformly and equitably applied to

all employees without regard to race, color, religion, sex, age, national origin, ancestry, physical or mental disability.

- B. All decisions concerning compensation shall be made in accordance with the guidelines contained in the "Salary Ranges" schedule.
- C. The opportunity for increased earnings and benefits shall be uniformly and equitably afforded to all persons.

## **5. Disciplinary and Termination Actions**

- A. It is the desire and policy of CityBus to minimize or eliminate the necessity of taking disciplinary action against its employees. All effort shall be exerted toward this end including counseling and communication of policy. If an employee is in doubt as to whether any action he/she may make is in violation of CityBus' rules and practices, the individual's ~~Manager, supervisor the Operations Manager,~~ or the ~~Union Steward Human Resources Administrator~~ should be consulted.
- B. Any disciplinary action against any employee shall be for good and sufficient cause as it affects work performance and effectiveness within the organization and shall be without regard to race, color, religion, sex, age, national origin, ancestry, physical or mental disability unrelated to performance and shall be consistent with CityBus handbooks.

## **D. Equal Opportunity Clause**

Every contract to which CityBus is a party shall contain, either verbatim or by reference, the equal opportunity clause, or its appropriate equivalent.

# **III. EQUAL EMPLOYMENT OPPORTUNITY POLICY**

This Equal Employment Opportunity Policy reaffirms the policy and commitment of Greater Lafayette Public Transportation Corporation (GLPTC) to provide equal employment opportunities for all employees and job applicants. GLPTC endorses and will follow our Equal Employment Opportunity Policy in implementing all employment practices, policies, and procedures.

It Is the Policy of GLPTC to recruit, hire, train, and promote persons in all job titles without regard to race, color, religion, national origin, sex, sexual orientation, age (except where sex or age is a bona-fide occupation qualification, as defined by law), or physical or mental disability (except where the disability prevents the individual from being able to perform the essential functions of the job and cannot be reasonably accommodated in full compliance with the law). In compliance with this policy and in furtherance of the principle of equal employment opportunity, GLPTC will administer all personnel decisions and actions, including but not limited to recruiting, hiring, compensation, benefits, transfers, promotions, demotions, layoffs, returns from layoff, terminations, GLPTC sponsored training, education tuition assistance, and social and recreation programs, without regard to race, color, religion, sex, age, national origin, or disability, except as noted above.

Any employee who believes that any form of prohibited discrimination, harassment, or intimidation has or is taking place should contact the Operations Manager-Human Resources Administrator either in writing or in person at 1250 Canal Road, Lafayette, IN 47904; Phone 765/423-2666, Fax 765/742-4729 or email [johnmehr@gocitybus.com](mailto:johnmehr@gocitybus.com). Employees and applicants for employment are protected from coercion, intimidation, interference, or discrimination for filing a complaint or assisting in an investigation. Any employee found to have engaged in such prohibited discrimination, harassment, or intimidation will be subject to disciplinary action up to and including discharge.

All employees are expected to comply with our Equal Employment Opportunity Policy. Managers and supervisors who are responsible for meeting GLPTC objectives are expected to cooperate fully in meeting our equal employment opportunity objectives and their overall performance will be evaluated accordingly.

Adopted by GLPTC Board of Directors on July 23, 1997(changed March 5, 2001)

#### **IV. SEXUAL HARASSMENT POLICY**

It is the policy of Greater Lafayette Public Transportation Corporation (GLPTC) to provide a work environment free from sexual and sex-based harassment. It is against the policy of GLPTC for any employee, whether a manager, supervisor, or co-worker, to sexually harass another employee or any passenger or prospective passenger of GLPTC.

Sexual harassment or sex-based harassment occurs when:

- ◆ Submission to unwelcome conduct of a sexual nature becomes an implicit or explicit condition of an employee's continued employment.
- ◆ Submission to or rejection of unwelcome conduct of a sexual nature affects other employment decisions regarding the employee; or
- ◆ Unwelcome conduct of a sexual nature creates an intimidating, hostile, or offensive working environment, whether for other employees or for passengers or prospective passengers of GLPTC.

Some examples of sexual and sex-based harassment are:

- ◆ Unwanted physical contact, including touching, pinching or brushing the body;
- ◆ Verbal harassment, such as sexual innuendoes, suggestive comments, jokes of a sexual nature, comments about gender-specific traits, sexual propositions, insults, threats, or demeaning unprofessional references to females (for example, honey, dear, girls, little lady, etc.);
- ◆ Non-verbal conduct, such as display of sexually suggestive objects or pictures, leering, whistling, or obscene gestures; and
- ◆ Acts of physical aggression, intimidation hostility, threats, or unequal treatment based on sex (even if not sexual in nature).

GLPTC realizes that employees may sometimes develop mutually agreeable relationships that could meet the definition of sexual harassment except for the consent of the people involved. However,



where such relationships occur between employees of unequal power or authority, there is a serious concern about whether the person with lesser power or authority really has consented to the relationship. In cases where the accused harasser claims the accuser consented to the conduct and the accused is in a position of greater power or authority (such as a supervisor of the accuser), GLPTC will question whether the accuser has in fact consented to the conduct giving rise to the complaint.

Any employee who believes he or she has been sexually harassed or who observes conduct he or she believes may be sexual harassment of a passenger or prospective passenger should:

- 1) Document the occurrence(s) of sexual harassment, including the names of any other individuals who have observed or have specific knowledge of the incident(s). Failure to do this step does not prevent the employee from doing Items (2) and (3) below.
- 2) If the employee is the person harassed, make it clear to the harasser that the conduct in question is unacceptable and unwelcome. Failure to do this step does not prevent the employee from doing items (1) and (3).
- 3) Report the conduct immediately to the incident investigator. The incident investigator will normally be the ~~Operations Manager/Manager of~~ Human Resources Administrator. However, if the ~~Operations Manager/Manager of~~ Human Resources Administrator is the object of the complaint, the incident investigator shall be the ~~Controller~~ CFO, and if she/he is the object of the complaint, the incident investigator shall be the ~~General Manager~~ CEO. In the event the ~~General Manager~~ CEO is the object of the complaint, the complaint shall be made directly to the ~~Chairman~~ of the Board of Directors of GLPTC, who shall be the incident investigator. The incident investigator shall make a thorough and impartial investigation of all complaints in a timely manner and report the results of his/her investigation to the person or body making the final determination. The ~~General Manager~~ CEO will make the final determination; however, if the ~~General Manager~~ CEO is the object of the complaint, the report shall be made to a quorum of the Board for final determination. The person or body making the final determination may conduct or direct additional investigation as she/he or it deems appropriate. Any person determined by the ~~General Manager~~ CEO or the Board to have sexually harassed another employee, passenger, or prospective passenger in violation of this policy, will be subject to disciplinary action in accordance with the GLPTC progressive discipline schedule, if she/he is subject to such schedule, or, if not subject to such schedule, such other discipline as the person or body making the determination deems appropriate. ~~Any person determined by the General Manager or the Board to have sexually harassed another employee, passenger, or prospective passenger in violation of this policy, will be subject to disciplinary action in accordance with the GLPTC progressive discipline schedule, if she/he is subject to such schedule, or, if not subject to such schedule, such other discipline as the person or body making the determination deems appropriate, up to and including termination.~~

Retaliating or discriminating against an employee for complaining about harassment is prohibited. GLPTC strongly disapproves of harassment, will not condone, or tolerate harassment, and will take reasonable steps necessary to discourage sexual harassment. GLPTC also recognizes that false accusations of sexual harassment can have serious effects on innocent men and women. GLPTC trusts that all employees will continue to act in a responsible and professional manner to establish a pleasant working environment free from discrimination.



## **V. RACE, COLOR, RELIGION, GENDER, SEXUAL ORIENTATION, NATIONAL ORIGIN, AGE, OR DISABILITY BASED HARASSMENT POLICY**

It is the policy of Greater Lafayette Public Transportation Corporation (GLPTC) to provide a work environment free from discrimination, including harassment on the basis of race, color, religion, gender, sexual orientation, national origin, age, and disability. It is against the policy of GLPTC for any employee, whether a manager, supervisor, or co-worker, to harass another employee or any passenger or prospective passenger of GLPTC. Prohibited harassment occurs when verbal or physical conduct:

- ♦ Defames or shows hostility toward an individual because of his or her race, color, religion, gender, national origin, age or disability, or that of the individual's relatives, friends, or associates;
- ♦ Creates or is intended to create an intimidating, hostile, or offensive working environment;
- ♦ Interferes or is intended to interfere with another employee's work performance or otherwise adversely affects the employee's employment opportunities.

Harassing conduct includes, but is not limited to:

- ♦ Epithets, slurs, negative stereotyping, or threatening, intimidating or hostile acts, which relate to race, color, religion, gender, national origin, age or disability;
- ♦ Written or graphic material that defames or shows hostility or aversion toward an individual or group because of race, color, religion, gender, national origin, age, or disability and that is placed on walls, bulletin boards, or elsewhere on the GLPTC's premises, or that is circulated in the workplace.

Any employee who believes he or she has been harassed in violation of this policy or who observes conduct he or she believes may be harassment of a passenger or prospective passenger in violation of this policy should:

1. Document the occurrence(s) of harassment, including the names of any other individuals who have observed or have specific knowledge of the incident(s). Failure to do this step does not prevent the employee from doing items (2) and (3) below.
2. If the employee is the person harassed, make it clear to the harasser that the conduct in question is unacceptable and unwelcome, if the person harassed believes it safe to do so. Failure to do this step does not prevent the employee from doing items (1) and (3).
3. Report the conduct immediately to the incident investigator. The incident investigator will normally be the ~~Operations—Manager/Manager of~~ Human Resources Administrator. However, if the ~~Operations—Manager/Manager of~~ Human Resources Administrator is the object of the complaint, the incident investigator shall be the ~~Controller CFO~~, and if she/he is the object of the complaint, the incident investigator shall be the ~~General Manager CEO~~. In the event the ~~General Manager CEO~~ is the object of the complaint, the complaint shall be made directly to the Chair~~man~~ of the Board of Directors of GLPTC, who shall be the incident investigator.

The incident investigator shall make a thorough and impartial investigation of all complaints in a timely manner and report the results of his/her investigation to the person or body making the final determination. The ~~General Manager-CEO~~ will make the final determination; however, if the ~~General Manager-CEO~~ is the object of the complaint, the report shall be made to a quorum of the Board for final determination. The person or body making the final determination may conduct or direct additional investigation as she/he or it deems appropriate.

Any person determined by the ~~General Manager-CEO~~ or the Board to have sexually harassed another employee, passenger, or prospective passenger in violation of this policy, will be subject to disciplinary action in accordance with the GLPTC progressive discipline schedule, if she/he is subject to such schedule, or, if not subject to such schedule, such other discipline as the person or body making the determination deems appropriate, up to and including termination.

Retaliating or discriminating against an employee for complaining about harassment is prohibited. GLPTC strongly disapproves of harassment, will not condone, or tolerate harassment, and will take reasonable steps necessary to discourage harassment that is in violation of this policy.

Adopted by GLPTC Board of Directors on July 23, 1997(changed March 5, 2001)

## **VI. EQUAL EMPLOYMENT OPPORTUNITY COMPLAINT PROCEDURE**

It is the policy of CityBus that any person who believed that he or she, individually or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin may file a written complaint with the Corporation. If the complainant is dissatisfied with the resolution or the case is not being resolved in a timely manner, the complaint maybe submitted to the FTA, The Secretary EEOC, or a state agency for investigation. A complaint must be filed within 180 days. It is ~~the Corporation's-CityBus'~~ intent to attempt to resolve all complaints at the Corporation level.

### **A. Filing Complaints of Discrimination**

Details for filing complaints of discrimination are explained in Sections III, IV, and V.

## **VII. EQUAL OPPORTUNITY ADMINISTRATOR (EOA)**

The EOA has the overall responsibility for overseeing the development and implementation of the Affirmative Action Program (AAP) and for purposes of the document will be referred to as the EOA. The EOA's responsibilities fall into two (2) general areas: first, equal employment opportunity, and second, contract compliance.

### **A. Some of the Duties of the EOA Are:**

1. To develop, direct, and monitor implementation of, and provide continuing evaluation of the CityBus Equal Opportunity Program. This will include

maintaining relevant statistics on minorities and women in the external labor force and within CityBus. In developing the AAP, the EOA will coordinate with other staff members as necessary.

2. To provide assistance to departments and divisions in resolving specific problems related to implementation of the AAP and achievement of stated goals and timetables.
3. To advise the ~~General Manager~~ CEO, and other appropriate personnel, of the most recent laws, regulations and guidelines from federal and state agencies as they affect equal employment opportunity and affirmative action within CityBus.
4. To maintain liaisons with the appropriate enforcement agencies at the federal and state levels and to ensure timely submission of civil rights and equal employment opportunity reports required by the U.S. Department of Transportation, Equal Employment Opportunity Commission, Officer of Federal Contract Compliance programs and others.
5. To maintain liaisons with minority and women's organizations, agencies concerned with employment of persons with disabilities, individuals who are older and other community groups.
6. To consult with and provide assistance to the ~~Administrative~~ Staff regarding all aspects of personnel procedures and employee relations practices, including those which appear neutral but, in fact, may have a disparate impact on minorities, women and disabled employees and applicants for employment.
7. To participate in orientation of new employees and other employee relations workshops for the purpose of explaining CityBus' Equal Employment Opportunity Policy and affirmative action efforts to counsel an employee on matters related to equal employment opportunity.
8. To review appointment, promotion, terminations, and other data pertinent to effective implementation of CityBus' AAP.
9. To advise prospective contractors and others on necessary steps to bring them into compliance with CityBus' requirements regarding equal employment opportunity.
10. To provide for and conduct compliance reviews deemed necessary to ensure effective program implementation.
11. To report periodically to the ~~General Manager~~ CEO on progress being made in the implementation of the AAP and to recommend program modifications.

## VIII. EEO STAFF RESPONSIBILITY

All administrative and supervisory personnel share the responsibility for ensuring the effectiveness of the Corporation's AAP and are evaluated on their performance in this area. They are expected to give their full cooperation and active support of the Affirmative Action Program to the ~~General Manager~~ CEO and the EOA.

### A. Among the Specific Requirements of Administrative and Supervisory Personnel Are:

1. To assist in identifying qualified minority, female and disabled candidates for vacancies or new positions within the CityBus work force.
2. To ensure equal employment opportunity for all employees and applicants for employment under his/her direct or indirect supervision with regard to training, work assignments, promotional evaluations, transfers, classification, compensation, assignment, of overtime and additional duties and all other terms and conditions of employment.
3. To establish employment goals and timetables in the form prescribed by the EOA and to prepare semi- annual reviews of his/her unit's performance against established goals and make recommendations for revisions of the AAP.
4. To ensure that compliant procedures are strictly adhered to without retaliation against any person filing a grievance or a formal discrimination complaint or against any person giving testimony or aiding in the resolution of such a complaint.

## IX. DISSEMINATION OF THE EEO PROGRAM – INTERNALLY

1. Management and supervisory personnel will be fully informed of the Corporation's Affirmative Action Program and will be forwarded a copy of the Plan Document for Equal Employment Opportunity.
2. A copy of the Corporation's Policy Statement will be posted on Corporation Bulletin Boards.
3. At Staff meetings, discussion of the program, review of individual responsibilities and progress will occur.
4. Management and supervisory personnel will be informed that their performance on Affirmative Action goals will be rated along with other criteria in evaluating their overall performance with respect to promotions and merit increases.

5. Any educational materials concerning the AAP will be made available to all management and supervisory personnel.
6. The EOA will disseminate articles and written publications to management and supervisory personnel to inform them of legal requirements affecting the operations of the Corporation.
7. Attendance at seminars, workshops, and training sessions by the EOA, management, and first-line supervisory personnel giving instruction concerning the AAP will be encouraged.
- ~~8. An electronic copy of the Corporation's EEO Policy shall be uploaded and maintained on the employee intranet.~~

## **X. DISSEMINATION OF THE EEO PROGRAM – EXTERNALLY**

The Corporation's Affirmative Action Program for Equal Employment Opportunity will be disseminated to the community at large as follows:

1. Recruiting sources will be informed in writing that CityBus is an Equal Opportunity Employer.
2. Written and personal contacts will be made with minority and women's organizations, community agencies and leaders, news media, high schools and colleges to inform them that CityBus is an Equal Opportunity Employer and encourage the application of minorities, women, persons with disabilities and other protected class members.
3. All advertisements contain the statement, "An Equal Opportunity Employer (EOE)."
4. The Corporation informs agencies such as Indiana Workforce Development and minority organizations of job openings and qualifications.

## **XI. AFFIRMATIVE ACTION PROGRAM - UTILIZATION ANALYSIS**

The purpose of the utilization analysis is to identify those job categories where there is an underutilization and/or concentration of minorities and women in relation to their availability in the relevant labor market. It is also to establish the framework for goals and timetables and other affirmative actions to correct employment practices that contributed to any identified absence, underutilization, or concentration.

The utilization analysis consists of a workforce analysis (Table I) and an availability analysis (Table II and Table III).

## A. Workforce Analysis

The workforce analysis shows a statistical breakdown of CityBus' workforce by job category (officials/administrators, office and clerical, skilled craft and transit operatives). Each of the above is cross-referenced by race, national origin and sex. For purposes of this program, the job descriptions are defined as follows:

### 1. Officials and Administrators

Occupations in which employees set broad policies, exercise overall responsibility for execution of these policies, or direct individual departments or special phases of the agency's operations, or provide specialized consultation on a regional, district or area basis. Within the CityBus organization, these positions include, but are not limited to: ~~General Manager~~ CEO, Operations Manager, Fleet Manager, Manager of ~~Development~~ Customer Experience, ~~Controller~~ CFO, Assistant Controller, and Assistant Manager of Maintenance.

### 2. Office and Clerical

Occupations in which workers are responsible for internal and external communications, recording and retrieval of data and/or information and other paperwork required in an office. Within the CityBus organization, these positions include, without limitation: Finance Specialists, Administrative Assistant, and ~~Telephone Information Clerk~~ Customer Service Representative.

### 3. Skilled Craft Workers

Occupations in which workers perform jobs which require special manual skills and a thorough and comprehensive knowledge of the processes involved in the work which is acquired through on-the-job training and experience or through apprenticeship or other formal training programs. At CityBus this includes, without limitation: Lead, A, B, and C Mechanics.

### 4. Transit Operatives

Occupations in which workers perform duties which result in or contribute to the comfort, convenience, hygiene or safety of the general public or which contribute to the upkeep and care of buildings, facilities or grounds of public property. Workers in this group may operate machinery. Within the CityBus organization, this includes, without limitation: Bus Operators, Shop Utility Personnel and Maintenance Cleaners.

The workforce analysis of CityBus employees is based on the transit system employment records as of January 2018~~22~~. At that time, a total of 1386 persons were employed in four job categories: Officials and Administrators, Office and Clerical, Skilled Labor, and Transit Operatives.

## B. Availability Analysis

Employment profiles of the Lafayette area by race and sex is shown in Table II. These figures were based on the most current Indiana Workforce Development data available. It is accepted

by CityBus that this statistical profile of the Lafayette area represents the pool of employees from which CityBus can recruit for employment.

### **C. Utilization Comparison**

Table III displays a comparison of the labor force participation rate of historically underutilized persons in the Lafayette area with the CityBus employee profile. These groups have been identified for the purpose of developing goals and timetables for the potential employment of persons within these groups, so that the CityBus workforce compares with the Lafayette area's available workforce.

### **D. Utilization Analysis**

A utilization analysis compares the workforce of CityBus to the available workforce of the community. The utilization analysis in Table III is comprised of three parts: The Workforce Analysis, the Availability Analysis, and the Utilization Comparison. The Workforce Analysis describes the composition of the workforce by sex and race and the functional relationship of persons currently employed by CityBus. The Availability Analysis provides a statistical profile of the Lafayette area labor force from which CityBus recruits its employees. The third element is a comparison of the workforce profile with the availability of minorities and women in the area's labor market.

**TABLE I**  
**CityBus-**  
**WORKFORCE**  
**ANALYSIS**  
**NUMBER OF EMPLOYEES IN VARIOUS EMPLOYMENT POSITIONS**

Job-Categories	Male					Female					TOTAL MINORITY	TOTAL FEMALE	TOTAL EMPLOYED
	White	African American	Hispanic	Asian- Pacific- Islander	American- Indian- or- Alaskan Native	White	African American	Hispanic	Asian- Pacific- Islander	American- Indian- or- Alaskan Native			
Officials and Administrators	11	1	0	0	0	4	0	0	0	0	1	4	16
Skilled Craft	11	0	0	0	0	0	0	0	0	0	0	0	11
Transit Bus-Operatives	53	8	4	0	0	32	7	0	0	0	19	39	104
Office and Clerical	0	1	0	0	0	4	2	0	0	0	3	6	7
Total	75	10	4	0	0	40	9	0	0	0	23	49	138
Percent of Total	54%	7%	3%	0%	0%	29%	7%	0%	0%	0%	17%	36%	100%



**TABLE II**  
**EMPLOYMENT STATUS BY SEX AND MINORITY**  
**STATUS LAFAYETTE MSA – 2000 ANNUAL**  
**AVERAGES**

SEX & MINORITY STATUS	LABOR FORCE	EMPLOYED	UNEMPLOYED	RATE	VERTICAL % DISTRIBUTION		
					LABOR FORCE	EMPLOYED	UNEMPLOYED
<u>BO</u> <u>TH</u> <u>SE</u> <u>XE</u> <u>S</u>							
TOTAL	95,822	89,689	6,133	6.4	100.	100.	100.
White	86,903	81,951	4,952	5.7	90.7	91.4	80.7
Black	1,750	1,478	272	15.5	1.8	1.6	4.4
American Indian/Alaska Native	385	332	53	13.8	0.4	0.4	0.9
Asian American/Pacific Islander	3,738	3,225	513	13.7	3.9	3.6	8.4
Two or More Races	1,023	890	133	13.0	1.1	1.0	2.2
Other Races	2,023	1,813	210	10.4	2.1	2.0	3.4
Hispanic origin	4,367	3,910	457	10.5	4.6	4.4	7.5
Total Minority*	13,286	11,648	1,638	12.3	13.9	13.0	26.7
<u>FE</u> <u>MA</u> <u>LE</u>							
TOTAL	43,879	41,268	2,611	6.0	100.	100.	100.
% of Both Sexes	45.8	46.0	42.6	---	---	---	---
White	40,422	38,341	2,081	5.1	92.1	92.9	79.7
Black	814	665	149	18.3	1.9	1.6	5.7
American Indian/Alaska Native	190	158	32	16.8	0.4	0.4	1.2
Asian American/Pacific Islander	1,275	1,086	189	14.8	2.9	2.6	7.2
Two or More Races	475	411	64	13.5	1.1	1.0	2.5
Other Races	703	607	96	13.7	1.6	1.5	3.7

Hispanic origin	1,688	1,503	185	11.0	3.8	3.6	7.1
Total Minority*	5,145	4,430	715	13.9	11.7	10.7	27.4

Notes: ~~\*Sum of Hispanic and all races, except white. Some duplication possible since persons of Hispanic origin may be of any race.~~  
~~Cohorts may not add to totals due to rounding. Zero indicates less than 5 or less than 0.05 percent.~~  
~~Unemployment rates and vertical % distribution are computed from unrounded data. Race/Sex data are derived from 2000 Census distribution.~~

Source: ~~Labor Market Information Services, Indiana Department of Workforce Development~~

**TABLE III**  
**CityBus**  
**UTILIZATION**  
**COMPARISON**

Job Categories	Total Number Employed	Work Force Analysis		Availability Analysis*		Utilization Comparison	
		Percent Minority	Percent Female	Percent Minority	Percent Female	Underutilized	
						Percent Minority (Yes/No)	Percent Female (Yes/No)
Officials and Administrators	16	6%	25%	*	*	YES	YES
Office and Clerical	7	43%	86%	*	*	NO	NO
Transit Bus Operatives	104	18%	38%	*	*	NO	YES
Skilled Craft	11	0%	0%	*	*	YES	YES
<b>TOTAL</b>	138	17%	36%	13.0 %	45.8 %		

\*Labor Pool figures of availability could not be obtained.

## **XII. AFFIRMATIVE ACTION PROGRAM – GOALS AND TIMETABLES**

This plan contains short and long range goals and timetables. The short-range goals are set for one year and will be reestablished annually. The long-range goals are established for a period of up to four years. The long-range goals and the objective of this program is to have the Greater Lafayette Public Transportation Corporation (GLPTC) job group population approximate the availability of the civilian labor force of the GLPTC labor area. Annually, on or about June 30 of each year, the EOA and the ~~General Manager~~ CEO will establish goals for the next year.

### **A. Long Range Goals**

The long-range goals for GLPTC are as follows:

1. Actively recruit minority and female candidates for skilled craft positions so that their job representation will reflect area population percentages.
2. Actively recruit minority and female candidates when a vacancy occurs in the Officials and Administrators category so that their job representation will reflect area population percentages.
3. Actively recruit minority candidates when a vacancy occurs in the Office and Clerical category so that their job representation will reflect area population percentages.
4. Continue to increase employment percentages for female employees in the following category: Transit bus operatives.

### **B. Short Range Goals**

The short-range goals for GLPTC are as follows:

1. Hire one minority/female employee in a skilled craft position if and when a vacancy occurs.
2. Hire one minority employee in an Office and Clerical position if and when a vacancy occurs.
3. Maintain minority employee percentages in the Transit Operatives job category.
4. Update the Transit Operative employment application to include a voluntary demographic questionnaire.

### **XIII. AFFIRMATIVE ACTION PROGRAM-ASSESSMENT OF EMPLOYMENT PRACTICES TO IDENTIFY CAUSES OF UNDER-UTILIZATION: AFFIRMATIVE ACTION TO REMEDY PROBLEM AREAS**

#### **A. Employment Practices**

Recruitment, selection, placement, promotion, training, compensation, benefits, disciplinary and termination practices are described in detail in Section II.C. Employment practices of Officials and Administrators, and Clerical Employees are established by job levels and individual employee performance. A formal performance appraisal system is used. The use of this system has not shown any pattern of bias or discrimination.

All other employees not listed above are represented by the Amalgamated Transit Union (ATU) Local No. 1741. These employees represent approximately 85% of the CityBus labor force. The use of ATU representation has not shown any pattern of bias or discrimination.

#### **B. External Factors**

Because of the low percentage of Hispanics and other foreign speaking persons in the community, language is not considered a barrier.

1. CityBus will make promotion decisions in accordance with the policies and principles embodied in this Plan.
2. CityBus will administer personnel actions affecting employees in areas such as compensation, benefits, transfers, layoffs, returns from layoff, company-sponsored training, education, tuition assistance and social and recreational programs without regard to race, color, religion, sex or national origin. CityBus will periodically review personnel actions and will collect data on a continuing basis for the purpose of monitoring such actions.
3. CityBus promulgates and administers the company's employee benefit plans, including retirement, pension, disability and insurance benefits, in a nondiscriminatory manner consistent with FTA regulations and other federal equal employment laws.
4. CityBus staff will meet periodically with management to review the EEO progress made and to develop necessary program steps should they be required.
5. Performance by CityBus staff and managers will be evaluated on the success of the EEO program the same way as their performance on other system goals.

### **XIV. AFFIRMATIVE ACTION PROGRAM-MONITORING AND REPORTING SYSTEM**

1. **Semi-Annual Reporting.** The EOA will prepare an annual report showing the

number of hires, promotions, transfers, resignations, terminations and retirements for the preceding six months. This data will be displayed by race, sex and job category.

2. **EEO Program Evaluation and Annual Report.** Annually, the EOA will prepare a summary of the progress made over the preceding twelve months. Assessments and corrective action will be made at this time if necessary. An annual report to the ~~General Manager~~ CEO will be prepared from the semiannual reports, which will include an evaluation of the EEO/AA Program.
3. **Goal Assessment.** The evaluation process will highlight the goals that were accomplished as well as pinpoint those goals which CityBus failed to achieve within the timetables that were set. The evaluation process will allow the ~~General Manager~~ CEO and the EOA to amend and reset the existing goals as well as identify other areas of underutilization and develop new goals with timetables to remedy these deficiencies.
4. **Applicant Flow Analysis.** The EOA will revise the current prospective hire application form to include voluntary questionnaires regarding gender and race. These findings will be recorded in the database for future projections and be included in the annual report to the CEO.
5. **Data Base for Future Projections.** The measures outlined above will provide an ongoing updated database for developing future projections and measuring results over time.

TABLE III

**CityBus**  
UTILIZATION COMPARISON

Job Categories	Total Number Employed	Work Force Analysis		Availability Analysis		Utilization Comparison		2018 Utilization Comparison	
		% Minority	% Female	% Minority	% Female	% Minority (Yes/No)	% Female (Yes/No)	% Minority (Yes/No)	% Female (Yes/No)
Officials and Administrators	15	20.0%	33.3%	*	*	<b>NO</b>	YES	YES	YES
Skilled Craft	12	8.3%	0.0%	*	*	YES	YES	NO	NO
Transit Bus Operatives	109	32.1%	40.4%	*	*	<b>NO</b>	<b>NO</b>	NO	YES
Office and Clerical	9	11.1%	88.9%	*	*	YES	<b>NO</b>	YES	YES
<b>Total</b>	<b>145</b>	<b>27.6%</b>	<b>39.3%</b>	<b>13.3%</b>	<b>49.3%</b>	<b>NO</b>	YES	NO	YES

\* Labor Pool figures of availability could not be obtained by job category.