

Instructions:

The following information is provided for guidance purposes only. As FTA guidance changes, this form may require additional and/or different information and may require updated versions.

From the FTA circular 4704.1A: Any FTA applicant, recipient, subrecipient, and contractor who meets both of the following threshold requirements must prepare and maintain an abbreviated EEO Program: Employs between 50-99 transit-related employees, and Requests or receives capital or operating assistance in excess of \$1 million in the previous Federal fiscal year, or requests or receives planning assistance in excess of \$250,000 in the previous Federal fiscal year.

The FTA additionally notes that: these smaller agencies are not required to conduct a utilization analysis with goals and timetables or to submit the EEO Program to FTA every four years. Instead, these agencies will be required to provide the EEO Program to FTA if requested by the Office of Civil Rights or for any State Management Review or Triennial Review.

If your agency chooses to utilize this document, please ensure that all sections are specifically updated to reflect **your** agency's policies and procedures. Text in the gray field requires input from your agency. Instructional language is specifically noted in each gray box. Text that is highlighted yellow is optional language that you can use or discard, or it is instructional language that should be deleted after completing that section. Regardless if you use the language or not, when this form is submitted to City of Phoenix Public Transit Department EEO Coordinator, no yellow highlights or gray text boxes should be left in the form.

Additionally, agencies must certify that the policies and procedures listed in this plan will be implemented. Audits or inspections by the City of Phoenix Public Transit Department EEO Coordinator will be conducted based on your agency's compliance with the submitted EEO Plan.

ALL PLANS MUST BE APPROVED BY YOUR AGENCY PROCESS(ES) – at a minimum the Statement of EEO Policy must be signed by the GM or CEO or City Manager.

ALL COMPLETED PLANS MUST BE POSTED OR MADE AVAILABLE AS YOU STATE IN YOUR PLAN.

SUBMIT YOUR FINAL APPROVED PLAN TO THE CITY OF PHOENIX PUBLIC TRANSIT DEPARTMENT WITH YOUR SUPPORTING DOCUMENTATION. City of Phoenix Public Transit Department Will then review your plan AND EITHER ACCEPT IT, OR REQUEST MODIFICATIONS. Your City of Phoenix Public Transit Department EEO Coordinator can provide technical assistance as requested.

*Abbreviated
Equal Employment Opportunity
Plan*

Agency or City Name

[Optional]

Insert city of agency picture here

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Statement of EEO Policy

TYPE YOUR AGENCY/TRANSIT PROVIDER NAME HERE has a commitment to be an equal opportunity employer. We strive to be a workplace reflective of the diversity of our community. No persons is excluded from employee opportunities in regards to race, color, religion, national origin, sex (including gender identity, sexual orientation, and pregnancy), age, genetic information, disability, veteran status, or other local, state or federally protected class.

TYPE YOUR AGENCY/TRANSIT PROVIDER NAME HERE policy applies to all employment actions including but not limited to: recruitment, hiring, promotion, transfer, demotion, layoff, termination or other forms of compensation. Our EEO plan is available for review by any employee or applicant for employment upon request.

The EEO Program is assigned to the [staff job title] who reports directly to the CEO/GM- insert job title. Applicants and employees have the right to file complaints alleging discrimination with the EEO Officer or our main office/HR. Retaliation against an individual who files a charge or complaint of discrimination, participates in an employment discrimination proceeding, or otherwise engages in protected activity is prohibited and will not be tolerated.

We will provide reasonable accommodations to applicants and employees who need them for a disability or religious observation, as long as it does not produce an undue hardship for TYPE YOUR AGENCY/TRANSIT PROVIDER NAME HERE.

The [CEO/GM/city manager staff job title] is responsible for the overall implementation and administration of the EEO Program. [Name of employee who holds job title just described] is the current [staff job title]. Their office is located at: [insert complete address of the building including suite or floor number]. Their phone number is [insert phone number of staff listed above]. The designated Equal Employment Officer is [name of current staff person acting in this position]. They are responsible for ensuring that hiring and recruitment follow all equal employment laws, regulations, and programs as well as administrating the grievance. Their office is located at: [insert complete address of the building including suite or floor number]. Their phone number is [insert phone number of staff listed above].

TYPE YOUR AGENCY/TRANSIT PROVIDER NAME HERE assigns specific tasks to managers and supervisors to ensure and achieve compliance. The performance of managers, supervisors, and others based on the success of the EEO Program in the same manner that the agency evaluates their performance in and will review these items at the employee's yearly performance review-insert review time.

Questions regarding the EEO Program should be discussed with either [staff named above] or with [human resources and their number]. The TYPE YOUR AGENCY/TRANSIT PROVIDER NAME HERE will not retaliate against staff or potential staff in regards to these communications.

Create a sentence stating the signer's personal commitment to an equal and inclusive workplace and that all applicants will be treated with respect and actions will follow the EEO requirements.

Printed name, Title (GM or CEO or City Manager)

Date

Agency Overview

This portion should be ideally a page or less describing your agency and the services it provides.

Dissemination Plan

To ensure the Equal Employment Opportunity (EEO) policy statement is fully and effectively publicized and disseminated, TYPE YOUR AGENCY/TRANSIT PROVIDER NAME HERE communicates its policy both internally and externally in the following manner:

The EEO policy will be publicized internally by:

- Providing written communications from GM/CEO/General Manager
- Posting official EEO materials and posters (Federal and State Labor Laws) on bulletin boards near time clocks (if you have them), in employees' break rooms, and in the employment/personnel office. These locations are listed in attachment 1.
- Including the EEO policy statement on the intranet, internet, and employee handbook, agency's personnel and operations manual, employee handbooks, reports and manuals (align this list to reflect the options available at your agency; it could be Distributing and explaining policy statement during new hire orientation and when administration regulations are updated.
- Conducting (at a minimum) semi-annual meetings with [name section or department/upper management of bus operations, HR, planning, marketing, etc.] to discuss the EEO Program and its implementation
- Meeting with all employees and affinity groups; this could be a board or group of advisors (list them) to seek input on the program implementation
- Conducting periodic EEO training for employees and managers
- Conducting EEO training for all new supervisors and managers within 90 days of new hire or promotion

The EEO policy statement will be publicized externally by:

- Including the statement "TYPE YOUR AGENCY/TRANSIT PROVIDER NAME HERE *is an Equal Employment Opportunity Employer*" in recruitment advertisements, online and on paper
- This bullet needs to state when there is outreach or advertising to recruitment entities (i.e. employment agencies, education institution, minority, and women organization), that the agency will disseminate their policy to those entities

Designation of Personnel

EEO Program Office Duties and Responsibilities

The EEO Officer [list their name from Statement of Policy] and their office / and assigned staff is (this should be worded to reflect the departments that are involved including human resources staff) responsible for developing and updating the EEO policy statement as well as writing and updating the EEO Plan. They will assist human resources and management staff in collecting and analyzing employment data, identifying problem areas, setting goals and timelines, and adjusting programs to achieve goals.

The EEO Program staff will design, implement, and monitor an internal audit system. They will also set up a reporting system to measure program effectiveness and to determine where progress has been made and if any actions or changes need to take place. A staff person will be assigned to concur in the hiring and promotion process. [example in attachments]

All managers and supervisors share in the responsibility for implementation of the EEO Program. The agency nondiscrimination plan will be reviewed by all managers and supervisors every [state how often at least an annual basis] You may also use a specific time period or specific event: at annual meeting; during new supervisor training class, etc.).

The EEO Officer and assigned program staff will

- Work with human resources staff to periodically review employment practices, policies for complaints, reasonable accommodation policies, performance evaluation, grievance procedures and [union agreements or other agreements that you may have].
- They will report at least semiannually [federal requirement states semiannual] to the GM/CEO/General Manager on each department's progress in relation to the agency's goals and on contractor and vendor compliance. [this is verbatim from requirement]
- Serve as the liaison between the City of Phoenix, list other government or regulatory agencies, and minority/women/disability group in the community
- Maintain awareness of current EEO laws and ensure that information is disseminated to responsible and necessary staff and officials
- Investigate complaints of EEO discrimination
- Provide staff training opportunities
- Work with human resources (or state name of hiring agency if your agency does not have an HR department or works with a third party for hiring) to ensure that employees and applicants have clear description of job entrance requirements, and that employees

and applicants are aware of professional development classes and training opportunities that are available

- Audit postings of the EEO policy statement to ensure that information is posted and up to date. [it is suggested that staff do this annually; if you choose annual note it on this bullet point; have assigned staff mark this on calendar to ensure follow-up AND so that it can be located and referenced when you are audited by the City of Phoenix; HR staff may already have policy for this]

Agency officials, Supervisors and Managers (choose the ones that are applicable) EEO Responsibilities

All management and supervisors (to match above title) are responsible for ensuring TYPE YOUR AGENCY/TRANSIT PROVIDER NAME HERE EEO Program policies and procedures are followed including:

- Participating in periodic audits and working to identify and remove barriers
- At management meetings [name specific title of meeting, such as “Weekly management meetings”] have opportunity to discuss policy and EEO concerns
- Assist EEO Officer in maintaining and updating maintaining and updating the personnel database (name database if you have specific one to list) for generating reports required for the nondiscrimination program
- Cooperating with the EEO Officer in review of information and investigation and complaints
- Encouraging employee participation to support the advancement of the EEO Program by (list what your agency does e.g., professional development, training, and career growth opportunities, posting promotional opportunities, job shadowing, mentoring)

Conflict of Interest

**** This is NOT required but if you have an agency policy please feel free to include it, an example follows:**

Should a conflict of interest occur with respect to the EEO Officer’s role and the Human Resources function in an investigation complaint, the GM/CEO/General Manager may assign a designee to the investigate a complaint to maintain the integrity of the EEO complaint process. Outside counsel may be employed to represent the agency in an EEO complaint. Findings must be reported directly to the GM/CEO/General Manager.

Employment Practices

A description of employee practices includes a narrative assessment of present employment practices (e.g., hiring, recruitment, training) and the statistical data to showing employment practices by sex and race [attach] If the information required is already covered in another federal report you can use the information from that report but please review the points to ensure they are covered.

Our statistical analysis contains:

- The number of applicants for employment in each job category and the number hired, cross-referenced by sex and race
- The number of employees in each job category who applied for promotion or transfer and the number in each job category promoted or transferred, cross-referenced by sex and race
- The number and types of disciplinary actions (e.g., indefinite suspension, loss of pay, demotion), tailored to the language used in union contracts and agency policies and procedures
- The number of voluntary/involuntary terminations, cross-referenced by sex and race
- Job category training that fosters promotion potential, cross-referenced by sex and race
- Individuals with Disabilities and Veterans, the number of applicants for employment and promotions in each job category and the number hired and promoted, cross-referenced by sex and race

Recruitment and Selection

Insert your agencies hiring practices in this section; this would include a few sentences for each bullet point based off of your HR policies on the topics below. It should correspond to the data on your agency website and hiring documentation.

- Recruitment and selection processing of applicants
- Interviews process
- Pre-employment process (background checks, examination, employment verification)
- Starting salaries (pay grade and range set up by your agency)
- New hire orientation (that there is a process to ensure hiring success)
- Promotion and transfer (including reclassification)
- Training opportunities/job skill development (both internally and externally, public and private)
- Tuition assistance program (if you have them)
- Compensation and benefits
- Disciplinary and termination processes

Insert your analysis data here. Include the date or fiscal years it represents.

Monitoring and Reporting Plan

Our monitoring system includes:

- Methods to monitor the EEO components identified in this chapter by (e.g., dissemination, utilization analysis, statistical employment practices, all identified barriers and the progress of the action plan) – choose what is reflective of your organization.
- Procedures used to determine EEO compliance of [“subrecipients and” –if applicable] contractors such as list what applies from the following: collection and review of their EEO Programs, visits to facilities to ensure proper posting of the EEO Policy Statement, etc.
- Procedures for reviewing union contracts, in conjunction with human resources, to ensure there is not a disparate impact [only applicable if you have unions]
- Process for monitoring complaints (e.g., describe the tracking system, monitoring of trends, timeliness of investigations, resolutions, reporting to management; the monitoring of complaints should not show names but should include the complaint # for tracking, date of complaint, investigation, resolution date and any follow up. This is done on a yearly basis; you can also state that there were no complains, “No complaints from January 1, 2016 to December 31, 2016”.)

Our reporting system includes:

- Meetings held between the CEO/GM/City Manager and the EEO Officer to discuss the progress of the EEO Program and the results of the monitoring by _____ (including but not limited to: hiring, promotions, status of EEO complaints)
- All program EEO -related meetings held between the EEO Officer and management, including topics covered, follow -up actions (in some agencies management may be HR or other positions)
- EEO Officer’s meetings with human resources and hiring officials to review current EEO goals and statistics on employment practices and policies _____ (add what you do; e.g., verifying that job descriptions contain legitimate position requirements and that all testing has been validated)

Attachment 1- EEO Posting Locations

The following is a list of the locations of where official EEO materials and posters including (Federal and State Labor Laws) are located:

- EXAMPLES:
- Building, Floor, Room name (breakroom or human resources office)
- City Hall, 4th floor, employee breakroom
- City Hall, 1st floor, bulletin board by front receptionist desk, (on the east facing wall)

Attachment 2 - Concurrence Memo Example

This attachment is NOT a requirement to include, but your agency must have a concurrence process that is tracked and saved so it can be audited by City of Phoenix when we do a site visit.

Insert blank agency concurrence memo if you choose to. Your memo should be similar to the example below:

Place on agency letter head.

To: Department head if city department, CEO/GM if other agency

From: Name of EEO officer and their agency job title

Date:

Subject: Employee Transaction

Per the requirements in Chapter II of FTA Circular 4704.1A (Equal Employment Opportunity (EEO) Requirements and Guidelines for Federal Transit Administration Recipients), I hereby concur with the (temporary) hiring of (name of employee) / promotion of (name of employee) to the position of (indicate agency title).

If the position is temporary add that in the above sentence as well as: "The position is currently vacant."

If the position is an acting position, include that in person's job title: "Acting Public Transit Director".

Name of EEO officer
Equal Employment Opportunity Officer

Attachment 3 – Organizational Chart

Attach a copy of your agency’s organizational chart showing reporting relationships of all directors, department heads, and executive leadership; include names and titles.

NOTE: This may or may not be different than your DBE and Title IV organizational charts. If it is the same as other organizational charts, please be sure to title it correctly and include the staff who is the EEO Officer.