

**SPOKANE TRANSIT AUTHORITY**

**DISCRIMINATION POLICIES**

**AND**

**EQUAL EMPLOYMENT OPPORTUNITY PROGRAM**

**2021**



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## STATEMENT OF POLICY

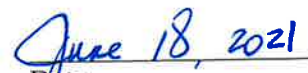
Spokane Transit Authority (hereinafter "STA") has a strong commitment to our employees, our customers, our business partners, and to the community we serve. As such, STA is committed to providing every STA employee, customer, and business partner with a work and service environment free from discrimination or harassment based on membership and/or status in a protected category. No person is unlawfully excluded from employment opportunities based on race, color, religion, national origin, sex (including gender identity, sexual orientation, and pregnancy), age, genetic information, disability, veteran status, or other protected class. As an equal opportunity employer, we strive to have a workforce that reflects the community we serve. Therefore, it is our policy to promote equal opportunity as it relates to all employment actions, including but not limited to, recruitment, hiring, selection for training, promotion, transfer, demotion, layoff, termination, rates of pay or other forms of compensation, without regard to any of the protected categories, set forth above.

All applicants and employees have the right to file complaints alleging discrimination. Retaliation against an individual who files a charge or complaint of discrimination, participates in an employment discrimination proceeding (such as an investigation or lawsuit), or otherwise engages in protected activity is strictly prohibited and will not be tolerated. STA is committed to providing reasonable accommodations to applicants and employees who need them because of a disability or to practice or observe their religion, absent undue hardship. STA also prohibits engaging in sexual harassment of any kind, including hostile work environment harassment (any unwelcome behavior that is sexual in nature in the workplace), quid pro quo harassment (in which the supervisor requests sexual favors in exchange for some benefit), or same sex harassment (male to male or female to female). Prohibited sexual harassment can be physical (such as unwelcome touching), verbal (such as sexual banter, demeaning jokes, discussing one's sexual activities), or visual (such as sexual cartoons, sexually suggestive photos/posters).

As STA's Chief Executive Officer, I maintain overall responsibility and accountability for STA's compliance with its EEO Plan and Program. To ensure day-to-day management, including program preparation, monitoring, and complaint investigation, I have appointed Nancy Williams, Director of Human Resources, (EEOOfficer@spokanetransit.com) as STA's EEO Officer. Ms. Williams will report directly to me and acts with my authority with all levels of management, labor unions, and employees. All STA executives, management, and supervisory personnel, however, share in the responsibility for implementing and monitoring STA's EEO Plan and Program within their respective areas and will be assigned specific tasks to ensure compliance is achieved. STA will evaluate its managers' and supervisors' performance on their successful implementation of STA's policies and procedures, in the same way STA assesses their performance regarding other agency's goals.

STA is committed to undertaking and developing a written nondiscrimination program that sets forth the policies, practices and procedures, with goals and timetables, to which the agency is committed and make the EEO Plan available for inspection by any employee or applicant for employment upon request. I am personally committed to a workplace that acts upon its daily responsibility to treat all applicants and employees with dignity and respect, as well as equitably under the guidelines of our EEO Plan.

  
\_\_\_\_\_  
E. Susan Meyer  
Chief Executive Officer

  
\_\_\_\_\_  
Date





## SEX DISCRIMINATION POLICY

In accordance with our policy of equal employment opportunity, we have adopted the following policy prohibiting sex discrimination and sexual harassment in the workplace. In addition to continued adherence to the goals enunciated in our Equal Employment Opportunity Program and Plan, we will also continue to do the following, as applicable:

### DEFINITION

The terms "because of sex," "on the basis of sex" and "regardless of sex" include, but are not limited to, because of or on the basis of pregnancy, childbirth or related medical conditions. Women affected by pregnancy, childbirth or related medical or physical conditions shall be treated for all employment-related purposes, including the receipt of benefits under fringe benefit programs, the same as other persons who are not so affected but are similarly able or unable to work.

### JOB POLICIES AND PRACTICES

- Review personnel policies to avoid discrimination on the basis of sex.
- Consider employees and applicants of both sexes for assignment, transfer or promotion to all positions for which they are qualified, except where sex is a bona fide occupational qualification.
- Administer employment opportunities, wages, hours, conditions of employment, pensions, recreation programs and employee benefits without regard to sex.
- Consider married and unmarried men and women equally in all personnel actions, including the administration of wages and benefits, without regard to the number of dependents which an individual may support or maintain. Retirement age and retirement benefits will be equal for both sexes.
- Provide appropriate facilities, e.g., rest rooms, for employees and applicants of both sexes.
- To the extent allowed by law, refrain from reliance upon state laws which conflict with and are superseded by Title VII of the Civil Rights Act of 1964, as amended, or Executive Order 11246.
- Provide leaves of absence to employees without regard to an employee's sex. No employee will be discriminated against because of pregnancy. Following childbirth, and upon signifying her intent to return within a reasonable time, STA will reinstate such employee to her original job or to a position of like status and pay without loss of service credits, unless the employee would not otherwise have been employed at the time of reinstatement.

### OUTREACH AND POSITIVE RECRUITMENT

In addition to the efforts outlined in detail in the STA's EEO Plan, STA will undertake appropriate outreach and positive recruitment activities, including:

- Recruit men and women for all positions, except where sex is a bona fide occupational qualification, without regard to the candidate's sex.
- Ensure that "help-wanted" advertising does not express a sex preference for any job, unless sex is a bona fide occupational qualification for that job.
- Refrain from placing advertisements in newspapers or other media which are labeled "Males" or "Females," or otherwise segregated by sex, unless sex is a bona fide occupational qualification.

### SENIORITY

Consider employees' seniority and administer any seniority system without regard to employees' sex.

### DISCRIMINATORY WAGES

Determine wage schedules without regard to sex. There will be equal pay for equal work.

### SEXUAL HARASSMENT

The EEO Officer shall notify all supervisors and managers that they are prohibited from engaging in, tolerating or otherwise promoting unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature by employees or supervisors, when (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual or (3) such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

The EEO Officer shall take reasonable steps to prevent sexual harassment from occurring, including, but not limited to, expressing strong disapproval of such conduct, developing appropriate sanctions, informing employees of their right to raise the issue of sexual harassment under Title VII and the procedure to do so and generally developing training programs to sensitize managers, supervisors and employees to the nature of this problem. STA maintains a policy prohibiting sexual harassment.

### LEAVE OF ABSENCE DUE TO MATERNITY

Leaves of absence due to maternity are considered under our policy.

## RELIGION AND NATIONAL ORIGIN POLICY

In accordance with its policy of equal employment opportunity, STA has adopted the following policy prohibiting discrimination on the basis of religion and national origin and supporting equal employment opportunity to ensure all individuals are employed and treated during employment without regard to their religion or national origin.

### SCOPE OF THIS POLICY

This policy applies to all terms and conditions of employment, including, but not limited to, hiring, upgrading, demotion, transfer, recruitment, recruitment advertising, layoff or recall from layoff, wage and benefit administration and selection for training.

### OUTREACH AND POSITIVE RECRUITMENT

To determine whether members of all religious and ethnic groups are receiving fair consideration for job opportunities, as needed, STA will periodically review its employment practices. As deemed appropriate, special attention may be directed toward executive and middle-management levels, where employment problems relating to religion and national origin are statistically most likely to occur. Based upon the findings of any such reviews and as appropriate, STA may undertake outreach and positive recruitment activities, such as those listed below. The scope of STA's efforts will depend upon all relevant circumstances including the nature and extent of any shortcomings, if any, and our size and resources.

STA will consider the following actions:

- Explaining to all employees the STA's obligation to provide equal employment opportunity, without regard to religion or national origin, in such a manner as to foster understanding, acceptance and support among other executives, management staff, supervisors and all other employees and encouraging such persons to take all actions necessary to aid STA in meeting our obligation;
- Developing reasonable monitoring procedures to ensure that our obligation to provide equal employment opportunity without regard to religion or national origin is being fully implemented;
- Informing periodically all employees of our commitment to equal employment opportunity for all persons without regard to religion or national origin; and
- Enlisting the assistance and support of recruitment sources (including employment agencies, college placement directors and business associates) in referring applicants without regard to religion or national origin.

### ACCOMMODATIONS TO RELIGIOUS OBSERVANCE AND PRACTICE

In addition to the efforts outlined in detail in the STA's EEO Plan, STA will endeavor to make a reasonable accommodation to the religious observances and practices of any employee or prospective employee, unless such an accommodation will impose an undue hardship on the conduct of our business. Generally, we will try to make reasonable accommodations to the religious observances and practices of any employee or prospective employee who regularly observes Friday evening and Saturday, or some other day of the week, as the Sabbath or who observes certain religious holidays during the year and is conscientiously opposed to performing work or engaging in similar activity on such days, when such accommodations can be made without undue hardship on the conduct of our business. In determining the extent of the hardship imposed, we may consider: (a) business necessity; (b) financial costs and expenses and (c) resulting personnel problems.

## DISABILITY POLICY

STA will take steps to ensure its personnel processes provide for careful, thorough, and systematic consideration of the job qualifications of applicants and employees who are known individuals with a disability for job vacancies filled either by hiring or promotion and for all training opportunities offered or available. Furthermore, STA will take appropriate steps to ensure its personnel processes do not stereotype individuals with a disability in a manner that limits their access to jobs for which they are qualified. STA will also periodically review such processes and make any necessary modifications to ensure these obligations are carried out.

### PHYSICAL AND MENTAL QUALIFICATIONS

STA periodically reviews of all physical and mental job qualification standards to ensure that, to the extent qualification standards tend to screen out qualified individuals with a disability, they are job-related for the position in question and consistent with business necessity. Furthermore, STA reviews the physical and mental job qualification standards each time a job opening is posted prior to recruiting for or promoting into a position.

Whenever STA applies physical or mental qualification standards in the selection of applicants or employees for employment or other change in employment status, such as promotion, demotion or training, to the extent that qualification standards tend to screen out qualified individuals with a disability, the standards shall be related to the specific job or jobs for which the individual is being considered and consistent with business necessity.

### OUTREACH AND POSITIVE RECRUITMENT

In addition to the efforts outlined in detail in STA's EEO Plan, STA will undertake appropriate outreach and positive recruitment activities reasonably designed to effectively recruit individuals with a disability. These activities may include:

1. Enlisting the assistance and support of the following persons and organizations in recruiting and developing on-the-job training opportunities for individuals with disabilities, to fulfill the STA's commitment to provide meaningful employment opportunities for such individuals,
  - Spokane Division of Vocational Rehabilitation;
  - State mental health agency, or State developmental disability agency;
  - WorkSource, and Career Transitions;
  - Spokane Department of Veterans Affairs Regional Office;
  - Entities funded by the Department of Labor that provide recruitment or training services for individuals with disabilities, such as the services currently provided through the Employer Assistance and Resource Network (EARN);
  - Local Employment Network (EN) organizations listed in the Social Security Administration's Ticket to Work Employment Network Directory;
  - Local disability groups, organizations, or Centers for Independent Living (CIL) near the contractor's establishment;
  - Placement or career offices of educational institutions that specialize in the placement of individuals with disabilities; and

- Private recruitment sources, such as professional organizations or employment placement services that specialize in the placement of individuals with disabilities.
2. Making individuals with disabilities available for participation in career days, youth motivation programs, and related activities in their communities.
  3. Taking other positive steps deemed necessary to attract qualified individuals with disabilities not currently in the work force who have requisite skills. These individuals may be located through State and local agencies supported by the U.S. Department of Education's Rehabilitation Services Administration (RSA), or local chapters of groups or organizations that provide services for individuals with disabilities.
  4. Considering applicants who are known to have disabilities for all available positions for which they may be qualified when the position(s) applied for is unavailable.

#### REASONABLE ACCOMMODATION

STA will provide reasonable accommodations for the known physical or mental limitations of an otherwise qualified individual with a disability unless doing so would impose an undue hardship on the operation of its business. If an employee who is known to be an individual with a disability is having difficulty performing his or her job, and it is reasonable to conclude that the performance problem may be related to the known disability, STA shall confidentially notify the employee of the performance problem and inquire whether the problem is related to the employee's disability. If the employee responds affirmatively, STA shall confidentially inquire whether the employee is in need of a reasonable accommodation.

#### HARASSMENT

STA has developed and implemented procedures to ensure employees are not harassed because of their status as an individual with a disability.

## PROTECTED VETERANS POLICY

Pursuant to our obligations under the Vietnam Era Veterans' Readjustment Assistance Act of 1974, STA maintains and posts an Equal Employment Opportunity Policy Statement. The policy statement indicates the top U.S. executive's support for STA's EEO Program, provides for a review and reporting system, and assigns overall responsibility for the implementation of EEO activities to the EEO Officer.

### JOB POLICIES AND PRACTICES

STA will take steps to ensure its personnel processes provide for careful, thorough, and systematic consideration of the job qualifications of applicants and employees who are known protected veterans for job vacancies filled either by hiring or promotion and for all training opportunities offered or available. STA will also take steps to ensure that when a protected veteran is considered for employment opportunities, it relies only on that portion of the individual's military record, including his or her discharge papers, relevant to the requirements of the opportunity in issue. Furthermore, STA will take appropriate steps to ensure its personnel processes do not stereotype protected veterans in a manner that limits their access to all jobs for which they are qualified. Finally, STA will periodically review such processes and make any necessary modifications to ensure that these obligations are carried out.

### OUTREACH AND POSITIVE RECRUITMENT

In addition to the efforts outlined in detail in the STA's EEO Plan, STA will undertake appropriate outreach and positive recruitment activities reasonably designed to effectively recruit individuals with protected veteran status. These activities may include:

1. Enlisting the assistance and support of the following persons and organizations in recruiting and developing on-the-job training opportunities for protected veterans to fulfill STA's commitment to provide meaningful employment opportunities for such veterans:
  - The Local Veterans' Employment Representative in the local employment service office closest to STA;
  - The Department of Veterans Affairs Regional Office closest to STA;
  - The veterans' counselors and coordinators ("Vet-Reps") on college campuses;
  - The service officers of the national veterans' groups active in the area;
  - Local veterans' groups and veterans' service centers near STA;
  - The Department of Defense Transition Assistance Program (TAP) or any subsequent program that, in whole or in part, might replace TAP; and/or
  - Any organization listed in the Employer Resources section of the National Resource Directory or any future service that replaces or complements it.
  
2. Considering taking the actions listed below, as appropriate, to fulfill its commitment to provide meaningful employment opportunities to protected veterans:
  - Holding formal briefing sessions with representatives from recruiting sources. Such briefings may include facility tours, clear and concise explanations of current and

future job openings, position descriptions, worker specifications, explanations of STA's selection process, and recruiting literature.

- Incorporating special efforts to reach students who are protected veterans.
  - Participating in work-study programs with Department of Veterans Affairs rehabilitation facilities that specialize in training or educating disabled veterans.
  - Taking other positive steps deemed necessary to attract qualified protected veterans not currently in the work force who have requisite skills. These persons may be located through the local chapters of organizations of and for any of the classifications of protected veterans.
  - Considering applicants who are known protected veterans for available positions for which they may be qualified when the position(s) applied for is unavailable.
3. Listing job openings with the National Resource Directory's Veterans Job Bank or any future service that replaces or complements it.

## POLICY FOR WOMEN AND MINORITIES

In accordance with its policy of equal employment opportunity, STA has adopted the following policy prohibiting discrimination of women and minorities and supporting equal employment opportunity to ensure all individuals are employed and treated during employment without regard to their gender or minority status.

### SCOPE OF THIS POLICY

This policy applies to all terms and conditions of employment, including, but not limited to, hiring, upgrading, demotion, transfer, recruitment, recruitment advertising, layoff or recall from layoff, wage and benefit administration and selection for training.

### JOB POLICIES AND PRACTICES

In addition to the procedures outlined in the EEO Plan, the EEO Officer will also, on an annual basis, analyze STA's processes to identify potential problem areas in the employment of women and minorities which may include review of the following areas:

- Compensation systems to determine whether there are gender-, race- or ethnicity-based disparities.
- Whether there is "underutilization" of minorities or women in specific job groups.
- Whether there is "under-representation" or "concentration" of minorities or women in specific departments.
- Whether lateral or vertical movement of women and minorities occurs at a lesser rate than that of employees who are members of non-protected groups.
- Whether the selection process eliminates a significantly higher percentage of employees who are women and minorities than employees who are members of non-protected groups.
- Whether minorities or women are significantly underrepresented in training or career improvement programs.

### OUTREACH AND POSITIVE RECRUITMENT

In addition to the efforts outlined in detail in the STA's EEO Plan, STA will undertake appropriate outreach and positive recruitment activities reasonably designed to effectively recruit women and minorities. These activities may include:

1. Contacting community agencies and educational institutions and seeking referrals of qualified individuals to increase the flow of minority and female applicants.
2. When meetings are held with representatives of recruiting sources, including presentations by minority, female, disabled, older or veteran employees, explanations about the job duties and responsibilities of current and future job openings, explanations of our employee selection process, and distribution of recruiting literature.
3. As appropriate, placing a reasonable proportion of our help-wanted advertising in media directed to minorities or women.
4. Posting or otherwise announcing appropriate promotion and transfer opportunities targeted to women and minorities.





**SPOKANE TRANSIT AUTHORITY EQUAL EMPLOYMENT  
OPPORTUNITY (EEO) PROGRAM AND PLAN**

## **I. DISSEMINATION OF EEO PLAN**

This section describes the formal communication mechanisms that STA has established to publicize and disseminate the organization's EEO Plan, as well as appropriate elements of the program, to employees, applicants for employment and the general public.

### **A. INTERNAL DISSEMINATION**

STA is committed to familiarizing its entire workforce with its EEO Program. To that end, all necessary steps will be taken to assure that personnel, management, supervisors and other appropriate individuals are fully apprised of the EEO Program and its existence. The following methods of internal dissemination have been and will continue to be used:

- The EEO Policy Statement will be discussed and reviewed in supervisory and management meetings.
- The Chief Executive Officer or the EEO Officer will disseminate the agency's EEO Policy Statement as well as other important aspects of the program to all employees and stakeholders.
- STA's EEO Policy Statement will be included in all personnel manuals.
- STA EEO Officer and/or designee will train senior and mid-level management employees on the aspects of this Program and its implementation.
- Periodic reviews with supervisory, managerial, and other employees, as appropriate, will be conducted to determine the effectiveness of various aspects of this Program.
- In order to inform non-supervisory staff of STA's EEO Program, EEO posters will be displayed in conspicuous locations.
- To ensure that new employees are thoroughly apprised of STA's EEO Program, the EEO Policy Statement will be distributed and discussed at the beginning of employment and in all training programs. At the time of this distribution, new employees will sign an acknowledgement of receipt form indicating that they have received the policy and will be held responsible for its contents. In addition, a member of the EEO Officer's staff or the EEO Officer will review the EEO Program as a component of the new hire process.
- The EEO Policy Statement is updated and distributed to all employees.
- The EEO Policy Statement is included in employee handbooks or manuals.
- The EEO Policy Statement is posted on the STA's public website.
- Diversity planning meetings and training sessions are conducted annually with executive level, managerial, and supervisory employees for the purpose of explaining both the intent of the policy and individual responsibility for implementation. At such meetings, the Chief Executive Officer and all administrators' commitment to the policy are clearly expressed, either in person or via written statements.
- During trainings for employees, each employee's right and responsibilities under the policy are explained, and employees receive additional copies of the STA EEO Policy Statement and discrimination policies.
- The EEO Program components and STA's commitment to EEO will be presented and discussed as an integral part of all training programs.

- The EEO Officer will present ongoing achievements, challenges, and initiatives to senior management and the Board of Directors on a regular basis to reemphasize both STA's commitment to EEO and to update managerial employees on progress toward EEO goals and objectives.
- Periodic reports of employment data and EEO goals and objectives will be produced by the EEO Officer and presented to the Chief Executive Officer for review and discussion.
- Employees are encouraged to bring questions, comments, or complaints with respect to the EEO Program or the implementation and administration of the EEO Program to the EEO Officer.

## **B. EXTERNAL DISSEMINATION**

The EEO Program is disseminated externally as follows:

- STA will ensure commitment and notification of the EEO Program with its local unions by distribution of the EEO Policy Statement to the local president. STA informs all unions in writing of its commitment to EEO. In doing so, STA makes clear that all referrals are to be treated without regard to race, color, religion, gender, national origin or other protected classes (also known as characteristics). Further, the unions are informed that STA actively seeks qualified minorities and women for employment. In addition, appropriate nondiscrimination clauses are included in all union agreements, and all contractual provisions are reviewed to assure that they are nondiscriminatory.
- The EEO Officer and/or designee will conduct periodic anti-discrimination and harassment prevention trainings for each of its unions. During this training, the EEO Policy Statement will be distributed and STA's EEO Program will be discussed.
- The EEO Officer will disseminate the EEO Policy Statement to each of its community partners, (such as employment agencies,, educational institutions, civil rights organizations, community action groups, training organizations, minority organizations, women's organizations, and other partners who refer applicants and/or have a particular interest in the recruitment or placement of women and minorities) with whom STA works to recruit qualified, diverse candidates to reaffirm STA's commitment to diversity and its EEO Program. The forms of communication may include, but are not limited to: e-mails, web site postings, and visual distribution.
- STA will inform all contractors and subcontractors in writing of its commitment to EEO by specifically stating that all employees hired by subcontractors on STA projects should be treated without regard to race, color, religion, gender, national origin or other protected characteristic. STA requires that all transit-related contractors with 100 or more employees submit their EEO policies or plans to STA for review.
- When the STA advertises job openings on radio or television, or in newspapers, other printed employment resources, online or at career fairs, whether on STA's website or another employment or community partner website, the advertisement will include the phrase "STA is an Equal Employment Employer."
- STA incorporates an equal opportunity clause into employment applications.
- STA's public website will continue to include information regarding its commitment to diversity and equal employment opportunity.



## **II. DESIGNATION OF PERSONNEL RESPONSIBILITY**

A successful EEO Program is contingent upon the efforts of many individuals. STA's commitment to EEO goals begins at the top of the organization with the Board of Directors and Chief Executive Officer. The importance with which they hold EEO goals is reflected in their resolve to appoint an individual to manage STA's EEO Program who reports to and is directly responsible to the Chief Executive Officer. This section summarizes the role of that individual and the roles of other key personnel involved with the EEO Program.

STA has appointed a specific executive, the EEO Officer, with responsibility to implement EEO Program. Further, STA has made known to each level of supervision that its work performance will be evaluated in part on the basis of its efforts to assure the success of the EEO Program and its objectives and that actions by supervisory personnel inconsistent with this Plan will not be tolerated.

### **A. EEO Officer**

The CEO has appointed Nancy Williams as STA's EEO Officer.

The CEO and executive administrators meet quarterly to measure the progress and achievement outlined in the EEO Program and discuss the contents of quarterly reports submitted to the CEO by the EEO Officer in accordance with the Federal Transit Authority and Washington State Department of Transportation. They will review the goals, training, and other priorities of the EEO Officer as appropriate.

The CEO and the EEO Officer will engage with STA senior leadership to ensure that STA leadership sets the tone and model for the rest of the organization by demonstrating their commitment to the EEO Program. The CEO and the EEO Officer will also ensure that the EEO Program and its implementation are discussed annually with STA Board of Directors or a committee of STA Board.

### **B. Identification and Responsibilities of the EEO Officer**

Nancy Williams, the STA EEO Officer, has primary management responsibility for ensuring full compliance with the provisions of STA's EEO Program and this Plan. Descriptions of the EEO Officer's basic responsibilities have been communicated to management and other appropriate employees. The EEO Officer reports directly to the CEO of STA and has been assigned a staff commensurate to meet the objectives of the EEO Program.

The responsibilities of the EEO Officer include, but are not limited to the following:

- Developing STA's EEO Program, through a Policy Statement, and a written EEO Plan.
- Monitoring EEO policies and procedures to ensure that they are consistent with the requirements of federal and state regulations.
- Periodically meeting with hiring managers to address progress towards achieving equitable representation in currently underutilized job groups and to develop targeted recruitment efforts among the hiring managers and HR.
- Developing and recommending a written EEO Plan and internal and external communication procedures.

- Evaluating EEO progress and developing alternative approaches where necessary, including establishing goals and timetables that are reasonable, attainable and consistent with the EEO commitment.
- Assisting management in collecting and analyzing employment data, identifying problem areas, setting goals and timetables, and developing programs to achieve goals.
- Designing and implementing review and reporting systems to collect employment data that will permit continuous monitoring of EEO Program progress and will serve to provide management with requisite data in that regard. Further, such systems will be used to measure the plan's effectiveness, determine the degree to which the objectives and goals have been achieved, and indicate any need for additional action.
- Reporting on a regular basis to STA's CEO on the progress of each unit in relation to the agency's goals.
- Administering a review of personnel actions (discipline, discharges, hires and promotions) that fall under the purview of the EEO Program.
- Reviewing EEO goals and area workforce demographics, complaint trends, and personnel transaction data on a regular basis to ensure compliance with agreed upon goals and objectives and, where necessary, identifying, developing and implementing corrective action or initiatives.
- Overseeing and monitoring the processing, investigation and ultimate disposition of all internal employment discrimination, harassment and retaliation complaints.
- Serving as STA's representative in its dealings with federal, state or local government agencies, regulatory agencies, minority, handicapped and women's organizations, and other community groups on matters relative to equal employment opportunities.
- Assisting in the recruitment of racial minorities, women, individuals with a disability and veterans as potential applicants and establishing outreach sources for use by hiring officials.
- Executing modifications of this EEO Plan.
- Assuring that current legal information affecting STA's EEO Program is disseminated to responsible officials and stakeholders.
- Reviewing and concurring with proposed candidate lists, temporary placements, and personnel requisition forms for all promotions, new hires and trade union referrals for diverse applicant and candidate pools and compliance with EEO goals and objectives.
- Periodically reviewing procedures to ensure compliance with the proper display of EEO posters, provision of comparable facilities for both men and women, and encouragement of full participation by racial minorities and female employees in all educational, training, recreational, and social activities.
- Periodically reviewing training programs and their patterns to ensure that any impediments to achieving EEO goals and timetables are identified and removed.
- Providing support and skills development for management to take immediate action to prevent discrimination, harassment and retaliation.
- Facilitating mandatory antidiscrimination and harassment prevention and retaliation training sessions for STA's management, supervisory personnel and employees.
- Providing guidance and direction, as required, to STA managers and employees to aid them in carrying out all actions necessary to meet and further STA's EEO goals and commitments.

- Investigating or overseeing investigation of complaints of EEO discrimination.

### **C. Conflict of Interest and Impartiality**

The EEO Officer or their qualified designee will be assigned to investigate any complaint. In the event a complain arises involving the EEO Officer or a member of Human Resources, the EEO Officer or their qualified designee will recuse themselves from the investigation and the CEO will obtain a third party external investigator to conduct an impartial and objective investigation.

### **D. Managers**

Decisions that impact most directly on the success of the EEO are made by persons at the managerial and/or supervisory level. Therefore, the roles of managers and supervisors are most crucial to the EEO Program. Each manager and supervisor is responsible for implementing the specific elements of the EEO Program that are designed to eliminate barriers to EEO which cause underutilization. The specific responsibilities of managers and/or supervisors may include, but are not limited to:

1. Assisting in identifying problem areas and establishing STA goals and objectives;
2. Participating actively in periodic review of all aspects of employment in order to identify and to remove barriers obstructing the achievement of specified goals and objectives;
3. Reviewing the qualifications of employees to assure that racial minorities, women, individuals with a disability and veterans are given full opportunities for transfers, promotions, training, salary increases, and other forms of compensation;
4. Conducting and supporting career counseling for all employees;
5. Providing relevant information concerning STA sponsored activities related to EEO including but not limited to: cultural events, recruitment opportunities, mentoring and the time required to participate;
6. Participating in periodic reviews to ensure that STA is in compliance (e.g., EEO posters are properly displayed on employee bulletin boards);
7. Cooperating with the EEO Officer in review of information and investigation of complaints; and
8. Encouraging employee participation to support the advancement of the EEO Program.



### **III. UTILIZATION ANALYSIS**

The Utilization Analysis is a diagnostic component of the EEO Program that compares STA's composition of its workforce with the composition of the relevant labor pools from which STA recruits employees to identify those job categories where there is underutilization and/or concentration of racial minorities and women. In order to arrive at the STA's utilization results, other analyses must be conducted. Each report utilized in the analysis is unique in the information that it provides to assist STA in determining areas of focus for improved results. A detailed report of STA's underutilization analysis is found in Appendix A.

This section includes the following analyses:

#### **A. Workforce Analysis**

To conform to applicable regulations, one of the diagnostic components of the EEO Program is the organizational profile. The organizational profile is an overview of the staffing patterns of STA and is used to determine whether there are areas in the workforce where racial minorities, women, individuals with a disability, and veterans are underrepresented or concentrated.

To complete the organizational profile, STA elected to follow the workforce analysis methodology. For each EEO-4 job category, the following data is provided: the total number of incumbents by gender, race, disability and Veteran status.

#### **B. Job Group Analysis**

The job group analysis is the second diagnostic component of STA EEO. This analysis provides a listing of titles within each EEO-4 job category. This analysis is also used to identify internal feeder job titles and entry-level positions.

For the purpose of its EEO Program and consistent with the reporting requirements for state and local government to the Equal Employment Opportunity Commission, STA uses the following EEO-4 job categories:

Officials and Administrators: Job classifications that fall into the Officials and Administrators job category are occupations in which employees set broad policies, exercise overall responsibility for execution of these policies, or direct individual departments or special phases of STA's operations, or provide specialized consultation on a regional, district or area basis.

Professionals: Job classifications that fall into the Professionals job category are occupations which require specialized and theoretical knowledge, which is usually acquired through college training or through work experience and other training which provide comparable knowledge.

Technicians: Job classifications that fall into the Technicians job category are occupations which require a combination of basic scientific or technical knowledge and manual skill that can be obtained through specialized post-secondary school education or through equivalent on-the-job training.

Protective Service Workers (Sworn and Non-Sworn): Job classifications that fall into the Protective Service Workers job category are occupations in which workers are entrusted with public safety, security and protection from destructive forces.

Paraprofessionals: Job classifications that fall into the Paraprofessionals job category are occupations in which workers perform some of the duties of a professional or technician in a supportive role, which usually require less formal training and/or experience normally required for professional or technical status.

Office and Clerical (also known as "administrative support"): Job classifications that fall into the Office and Clerical job category are occupations in which workers are responsible for internal and external communication, recording and retrieval of data and/or information and other paperwork required in an office.

Skilled Craft: Job classifications that fall into the Skilled Craft job category are occupations in which workers perform jobs which require special manual skill and a thorough and comprehensive knowledge of the processes involved in the work which is acquired through the on-the-job training and experience or through apprenticeship or other formal training programs.

Service Maintenance: Job classifications that fall into the Service Maintenance job category are occupations in which workers perform job duties which result in or contribute to the comfort, convenience, hygiene or safety of general public or which contribute to the upkeep and care of buildings, facilities or grounds of public property.

### **C. Availability Analysis (Two-Factor Analysis)**

The final diagnostic component of the EEO Program is the availability analysis or "Incumbency vs. Estimated Availability Analysis". The purpose of the availability analysis is to establish a benchmark against which the demographic composition of STA's workforce may be compared to determine whether barriers to employment opportunity may exist within particular job groups.

STA used the following factors in determining the availability of minorities and women for each EEO-4 job categories:

- **Internal Availability:** Internal availability concerns the percentage of minorities and women among those promotable, transferable, and trainable within the Department. "Trainability" refers to those STA employees who could, with reasonable training, become promotable or transferable during the EEO Program year.
- **External Availability:** External availability concerns the percentage of minorities and women within the requisite skills in the reasonable recruitment area.

To calculate the raw external availability percentages for STA, the following steps were taken:

- Employee files were used to determine job titles within job groups that have current employees in them.
- Census codes were assigned to each unique job title within each job group.
- Employee residence zip codes was used to establish a labor area (i.e., external market availability) for those job groups.
- Each census code was linked to census data within the identified labor area(s) (i.e., raw availabilities).

#### **D. Local/Reasonable Recruitment Areas (External) Determination:**

To calculate the raw external availability percentages, the following steps were taken:

1. Employee files were used to determine job titles within job groups that have current employees in them.
2. Census codes were assigned to each unique job title within each job group.
3. Employee residence zip codes were used to establish a local labor area (i.e., external market availability) for those job groups.
4. Each census code was then linked to census data within the identified labor area(s) (i.e., raw availabilities).
5. Each census code within a job group was weighted based on the number of incumbents that hold the particular census code.
6. The census data (i.e., raw availabilities) were then weighted by the census code weightings. This became the final raw external availability.

The principal place of business of STA is Spokane, Washington. In determining the labor market surrounding the facility, STA has reviewed the residences of its incumbent workforce. In view of this distribution of incumbents, the Authority has determined that it is reasonable to treat the Spokane Valley Metropolitan Statistical Area as the labor market surrounding the facility.

#### **E. Workforce Analysis Data**

STA's workforce analysis is broken down by categories of racial minorities, women, individuals with disabilities and veterans. The snapshot of the STA workforce for 2020 denote that there were a total of 615 employees (including full time and part time), 11.71% (72) racial minorities, 28.62% (176) women, 4.39% (27) who have self-identified as an individual with a disability and 8.29% (51) veterans.

#### **Results:**

Underutilization was identified in the following job categories:

Technician Job Category underutilization was identified in the following:

- White females: the current workforce of white females is made up of 2 employees in the Technician job category. The number of hires needed to reach parity in this job category for females is 12. STA's annual placement goal for females in this job category is 1 due to the hiring needs of the agency and the workforce availability at the time of such hiring needs. Over the course of 4 years, STA aims to reach parity in this job category.

**Action Plan:** As part of its overall strategy, STA has identified agencies, organization and media whose focus is the engagement of females. Through this effort, STA hopes to strengthen the size of its female workforce to better reflect the community that it serves. Additionally, STA will make efforts to use inclusive imagery in its job advertisements when practicable.

Protective Services Job Category underutilization was identified in the following:

- White females: the current workforce of white females is made up of 1 employee in the protective services job category. The number of hires needed to reach parity in this job

category for females is 1. STA's annual placement goal for females in the job category is 1.

**Action Plan:** As part of its overall strategy, STA has identified agencies, organization and media whose focus is the engagement of females. Through this effort, STA hopes to strengthen the size of its female workforce to better reflect the community that it serves. Additionally, STA will make efforts to use inclusive imagery in its job advertisements when practicable.

Skilled Craft Job Category underutilization was identified in the following:

- White females: the current workforce of white females is made up of 0 employees in the Skilled Craft job category. The number of hires needed to reach parity in this job category for females is 2. STA's annual placement goal for females in the job category is 1.

**Action Plan:** As part of its overall strategy, STA has identified agencies, organization and media whose focus is the engagement of females. Through this effort, STA hopes to strengthen the size of its female workforce to better reflect the community that it serves. Additionally, STA will make efforts to use inclusive imagery in its job advertisements when practicable.

Service Maintenance Job Category underutilization was identified in the following:

- Asian males: the current workforce of Asian males is made up of 4 employees in the service maintenance job category. The number of hires needed to reach parity in this job category is Asian males is 2. STA's annual placement goal for Asian males in this job category is 1.

**Action Plan:** As part of its overall strategy, STA has identified agencies, organization and media whose focus is the engagement of Asian individuals. Through this effort, STA hopes to strengthen the size of its Asian workforce to better reflect the community that it serves. Additionally, STA will make efforts to use inclusive imagery in its job advertisements when practicable.

- Multiracial males: the current workforce of multiracial males is made up of 1 employee in the service maintenance job category. The number of hires needed to reach parity in this job category is Asian males is 4. STA's annual placement goal for multiracial males in this job category is 1.

**Action Plan:** As part of its overall strategy, STA has identified agencies, organization and media whose focus is the engagement of multiracial individuals. Through this effort, STA hopes to strengthen the size of its multiracial workforce to better reflect the community that it serves. Additionally, STA will make efforts to use inclusive imagery in its job advertisements when practicable.

- Hispanic/Latino males: the current workforce of multiracial males is made up of 15 employees in the service maintenance job category. The number of hires needed to reach parity in this job category is Hispanic/Latino males is 1. STA's annual placement goal for multiracial males in this job category is 1.

**Action Plan:** As part of its overall strategy, STA has identified agencies, organization and media whose focus is the engagement of multiracial individuals. Through this effort, STA hopes to strengthen the size of its multiracial workforce to better reflect the community that it serves. Additionally, STA will make efforts to use inclusive imagery in its job advertisements when practicable.

- White females: the current workforce of white females is made up of 90 employees in the service maintenance job category. The number of hires needed to reach parity in this job category for females is 55. STA's annual placement goal for females in the job category is 10 due to the hiring needs of the agency and the workforce availability at the time of such hiring needs. Over the course of 6 years, STA aims to reach parity in this job category.

**Action Plan:** As part of its overall strategy, STA has identified agencies, organization and media whose focus is the engagement of females. Through this effort, STA hopes to strengthen the size of its female workforce to better reflect the community that it serves. Additionally, STA will make efforts to use inclusive imagery in its job advertisements when practicable.

- American Indian/Alaskan Native females: the current workforce of AI/AN females is made up of 1 employee in the service maintenance job category. The number of hires needed to reach parity in this job category for females is 1. STA's annual placement goal for females in the job category is 1.

**Action Plan:** As part of its overall strategy, STA has identified agencies, organization and media whose focus is the engagement of black females. Through this effort, STA hopes to strengthen the size of its female workforce to better reflect the community that it serves. Additionally, STA will make efforts to use inclusive imagery in its job advertisements when practicable.

- Hispanic/Latina females: the current workforce of Hispanic/Latina females is made up of 2 employees in the service maintenance job category. The number of hires needed to reach parity in this job category for females is 7. STA's annual placement goal for females in the job category is 2 due to the hiring needs of the agency and the workforce availability at the time of such hiring needs. Over the course of 4 years, STA aims to reach parity in this job category.

**Action Plan:** As part of its overall strategy, STA has identified agencies, organization and media whose focus is the engagement of Hispanic and Latina females. Through this effort, STA hopes to strengthen the size of its female workforce to better reflect the community that it serves. Additionally, STA will make efforts to use inclusive imagery in its job advertisements when practicable.

- Asian females: the current workforce of white females is made up of 1 employee in the service maintenance job category. The number of hires needed to reach parity in this job category for females is 5. STA's annual placement goal for females in the job category is 1.

**Action Plan:** As part of its overall strategy, STA has identified agencies, organization and media whose focus is the engagement of females and Asian Americans. Through

this effort, STA hopes to strengthen the size of its female and Asian workforce to better reflect the community that it serves. Additionally, STA will make efforts to use inclusive imagery in its job advertisements when practicable.

- **Multiracial females:** the current workforce of multiracial females is made up of 4 employees in the service maintenance job category. The number of hires needed to reach parity in this job category for females is 1. STA's annual placement goal for females in the job category is 1 due to the hiring needs of the agency and the workforce availability at the time of such hiring needs.

**Action Plan:** As part of its overall strategy, STA has identified agencies, organization and media whose focus is the engagement of females. Through this effort, STA hopes to strengthen the size of its multiracial female workforce to better reflect the community that it serves. Additionally, STA will make efforts to use inclusive imagery in its job advertisements when practicable.

#### **IV. GOALS AND TIMETABLES**

STA compared the current level of minority and female employment, as set forth in the job group analysis, with the availability of minorities and females, as estimated through the factors described in previous sections. As a result of this comparison, both short and long-term goals were established where minorities and females indicated underutilization in certain EEO job categories. These goals are not quotas, but objectives to be pursued by mobilization of available resources for a "good faith effort." Though some numbers were high in regard to underutilization at STA, these numbers do not reflect the actual vacancies at STA.

STA will utilize its EEO Program goals to guide managers as to the desired levels of hiring of persons in the underutilized job category. To be as aggressive as possible in setting goals, making progress and achieving the above objectives, the annual or short-term hiring goal in any group will be equal to availability and only the "Whole Person Rule" has been applied. Whole-Person Rule is an analysis that determines underutilization. Underutilization is declared if the number of females/minorities in a job group is as much or more than one person below the number that would cause the job group participation percentage to match exactly the availability percentage.

In pursuing its EEO Program goals, STA will apply the following principles: First, quotas are expressly forbidden. Second, in all employment decisions, selections are to be made in a non-discriminatory manner. Placement goals do not provide a justification to extend preference to an individual on the basis of that person's race, color, religion, gender, national origin or other protected characteristic. Third, placement goals may not be used to supersede merit selection principles. Placement goals do not require hiring a person who lacks qualifications to perform the job successfully or hiring a less qualified person in preference to a more qualified person. Fourth, STA's efforts are to identify goals that are significant, measurable, and attainable with specific timetables for planned results. Fifth, goals will be set with attention to anticipated attrition, expansion, contraction, turnover in the work force, and availability of persons with required skills. Sixth, changes to existing employment practices which may contribute to the underutilization in increasing availability of minorities and women will be considered. Seventh, no goal will be rigid or inflexible, and will be reasonably attainable targets through the agency's good faith efforts to make its EEO Program succeed.

Appendix A of the 2021 Equal Employment Opportunity Plan represents the ultimate goals and the number of positions needed to reach parity for those job categories that have been identified as underutilized as a result of the utilization analyses. Planned percent increase for the following four years represents the STA's goals of hiring to address the underutilization identified.

## **Female Placement Goals**

Underutilization was identified in four job categories for women in general and minority women. The biggest challenge in meeting the STA's female goals was and continues to be finding women who have experience and interest in the transportation industry. In order to address this disparity and reach the desired level of diversity, STA will continue its outreach efforts to women's organizations. Over the plan period, STA has undertaken a number of internal and external recruitment and outreach activities to attract and promote women and minorities, including active outreach to AARP, Community Colleges of Spokane, West Central Community Center, The Arc, YMCA, Division of Vocational Rehabilitation, Goodwill, NAACP, , N.A.T.I.V.E. Project, Skills'Kin, Highland Park Methodist Church, Senior Times, Gonzaga University, Career Transitions, Spokane Tribe, Career Path Services, Whitworth, Easter Seals, YWCA, Korean Presbyterian Church, The Black Lense, EWU, United Way, Martin Luther King Jr. Family Center, Dept. of Veteran Affairs, Spokane Library, and WorkSource. In every area above, STA has made good-faith efforts to meet its placement goals and will continue to do so for the next goal period.



## **V. ASSESSMENT OF EMPLOYMENT PRACTICES**

STA's EEO Officer conducts an annual review of employment practices in order to ensure that STA's commitment to EEO is being fully implemented. STA's principal employment practices and procedures are summarized below. The detailed assessment of STA's employment practices is found in Appendix B.

### **A. Conducting The Assessment**

In conducting the assessment and identification of problem areas, STA will evaluate the impact of STA's employment practices on employment and advancement of a diverse workforce. As such, STA will evaluate employment patterns including recruitment, selection, promotion, termination, transfer, layoff, disciplinary action, compensation and benefits, training, etc. The assessment will be conducted using the following guidelines:

- A narrative description and an analysis of all recruitment and employment selection procedures from the agency's last EEO submission, including position descriptions, application forms, recruitment methods and sources, interview procedures, test administration and a determination of each practice's impact and validity, educational prerequisites, referral procedures, and final selection methods;
- A narrative description and analysis of promotion procedures and formal and informal training programs;
- A narrative description and analysis of disciplinary procedures such as suspensions and termination practices; and
- A reasonable assessment to determine if the employment of affected classes of persons is inhibited by external factors (e.g., not knowing where to apply for jobs, the availability of bilingual materials and information, etc.)

The narrative descriptions and analyses will be presented in a detailed fashion. Where written, formal, or scored tests are used in the employment selection process, the agency will identify the test, describe the procedures followed in administering and scoring the test, the weight that is given to test scores, how a cut-off score is established, and whether the test has been validated to predict or measure job performance and if so, an assessment of its nondiscriminatory impact, and a description of the validation study. All other selection procedures must comply with requirements of 29 CFR Part 1607. In general, the guidelines require that a selection procedure that may have a potential negative impact on the employment of minorities or women must be validated or otherwise justified as necessary for successful job performance, in accordance with procedures specified in the guidelines.

### **B. Statistical Data**

STA is required to count and record applicants and selections by sex (male and female) and five racial/ethnic origin groups (White, Black, Hispanic, Asian/Pacific Islander and American Indian/Alaska Native). Records must be maintained on an annual basis on the number of persons hired, promoted, discipline, demoted, trained, laid off, terminated, etc. for each job group.

A potential negative impact determination, using the 4/5ths or 80% rule, are required for each group comprising 2% or more of the relevant labor force or applicable workforce. For example,

potential negative impact determinations must be made for new hires and each group which constitutes 2% or more of the applicants. For promotions, potential negative impact determinations must be made for each group constituting 2% or more of STA's workforce. There may be evidence of a potential negative impact when any racial/ethnic or gender group has a selection rate of less than 80% of the group with the highest selection rate, unless the impact is validated or otherwise justified as necessary for successful job performance or agency's hiring needs.

Whenever a potentially negative impact is found, STA will examine the selection procedure to determine what is causing it. The potentially negative impact may be validated or justified by business necessity for performance of a position. If there is no business validation or justification for the potential negative impact identified, STA will consider the following options:

- Change the procedure to ensure less negative impact on the identified group or category, if possible; or
- Use a different procedure to prevent a potential negative impact, if available.

### **C. Employment Practices Reviewed**

Before posting a vacancy, the EEO Officer reviews the job posting to make sure that the essential functions are listed and job requirements are job-related. The EEO Officer also reviews the EEO Program to determine whether there are utilization targets for protective group members in the particular job category to identify recruitment and outreach needs. Targeted recruitment is done with underutilized groups to ensure that the applicant pool reflects the diversity within the applicable labor force.

To prevent a potentially negative impact in its employment decisions, STA uses a structured interview process. Human Resources is involved with every interview to ensure the integrity of the interview questions and selection process. Managers are required to follow the procedures outlined in the STA's "Interview Toolkit," which is tailored for each position and category. The EEO Officer is also consulted on the establishment of interview questions to make sure that the questions asked are job-related.

Utilization targets are consulted and taken into consideration when determining the best candidate for a position. When individuals have equivalent qualifications, the hiring manager and HR must consider protective group members according to the guidelines of the EEO Program. Hiring Managers are held accountable for efforts in promoting equal employment opportunity in the hiring and selection process. Selection under the EEO Program does not require the selection of an unqualified candidate nor does it require the selection of persons on the basis of race, color, gender, religion, or national origin.

In any employment practice or job category where a potentially negative impact is identified, STA first analyzes the reasons for the potential negative impact to determine whether or not the potential negative impact may be justified by a business or hiring need of the agency. If no such justification is identified, then STA conducts an analysis of the reason for the potentially negative impact and creates an action plan to address it.

## **D. Placement**

STA's monitoring reports were reviewed by the EEO Officer. The analysis period for STA is January, 1, 2020 to December 31, 2020. The sections below identify a potential negative impact in hiring and retention at STA.

### **1. Hires**

#### **During this reporting period:**

2 positions were filled in the Officials and Administrators category.

6 positions were filled in the Professionals category;

3 positions were filled in the Technicians category;

3 positions were filled in the Protective Services category;

1 position was filled in the Administrative Support category; and

52 positions were filled in the Service-Maintenance category.

**The 4/5ths analysis indicated that there may be a potential negative impact in the following areas:**

- Professionals: White males, Hispanic males, Black males and females, and multiracial males and females
- Technicians: White males and females, Black males, Hispanic males, and multiracial males
- Protective Services: White males and females, Black males, and Asian males
- Administrative Support: White males, Black males, Hispanic males and females, and multiracial males and females
- Skilled Craft: White males, American Indian/Alaskan Native males, Black males and Females, Hispanic males, Native Hawaiian or Pacific Islander males, and multiracial females
- Service Maintenance: White males, Black males, and Hispanic males, and Multiracial males

#### **Action plan:**

In any employment practice or job category where a potentially negative impact is identified, STA first analyzes the reasons for the potential negative impact to determine whether the potential negative impact may be justified by a business or hiring need of the agency. If no such justification is identified, in an effort to address the potential negative impact areas indicated above, the utilization targets are consulted and taken into consideration when determining the best candidate for a position. When individuals have equivalent qualifications, the hiring manager and HR must consider protective group members according to the guidelines of the EEO Program. Hiring Managers are held accountable for efforts in promoting equal employment opportunity in the hiring and selection process. Selection under the EEO Program does not require the selection of an unqualified candidate nor does it require the selection of persons on the basis of race, color, gender, religion, or national origin. The EEO Officer will review the applicant pool of candidates that have met the minimum requirements for a position to ensure diversity when possible. In addition, the EEO Officer will review selection packages in designated underutilized positions to ensure equity.

## 2. Promotions

### **During the plan period STA processed the following promotions:**

3 in the Professionals Category  
1 in the Technicians category;  
1 in the Administrative Support category;  
13 in the Skilled Craft category; and  
22 in the Service Maintenance Category.

### **The 4/5ths analysis indicated that there may be a potential negative impact in the following areas:**

Professionals: White males;  
Technicians: Multiracial males;  
Administrative Support: White males, Black Males;  
Skilled Craft: White males, Hispanic males.

### **Action Plan:**

In any employment practice or job category where a potentially negative impact is identified, STA first analyzes the reasons for the potential negative impact to determine whether the potential negative impact may be justified by a business or hiring need of the agency. If no justification is identified for the potential negative impact identified above, then the EEO Officer will conduct a review and continue to monitor the promotional process as part of the STA's internal review and monitoring practices. Further, the EEO Officer will review all promotions in designated underutilized positions to ensure equity. The EEO Officer will receive a list of all potential candidates eligible for promotion and justification for selected hire. Where possible and necessary, professional development and skill-based training will be offered to address the potential negative impact.

## 3. Disciplinary Actions

STA defines disciplinary action to include verbal warning, formal letter of warning/written reprimand, and suspension.

### **During the plan period STA processed the following disciplinary actions:**

3 disciplinary actions were issued to employees in the Administrative Support category;  
6 disciplinary actions were issued to employees in the Skilled Craft category; and  
75 disciplinary actions were issued to employees in the Service Maintenance Category.

### **The 4/5ths analysis indicated that there may be a potential negative impact in the following areas:**

Skilled Craft – Asian Males

### **Action Plan**

In any employment practice or job category where a potentially negative impact is identified, STA first analyzes the reasons for the potential negative impact to determine whether the potential

negative impact may be justified by a business need of the agency. If no justification is identified for the potential negative impact identified above, then the EEO Officer will conduct a review and continue to monitor the progressive discipline process as part of the STA's internal review and monitoring practices. Further, the EEO Officer will review all discipline in designated underutilized positions to ensure equity.

#### 4. Involuntary Separations

Involuntary terminations are actions caused by STA such as termination for cause or layoff.

**During the plan period STA processed the following involuntary terminations:**  
12 positions in the Service Maintenance Category.

There was no potential negative impact identified in any category.

#### **Action Plan**

Human Resource will conduct exit interviews on all involuntary separations. The EEO Officer will conduct a qualitative and quantitative review as part of the exit interview process to ensure that there is no potential negative impact in the future as well.

### **E. Trainings**

#### 1. Antidiscrimination and Sexual Harassment

The EEO Officer will ensure that all employees of STA are trained and appropriately updated on all policies as outlined in the EEO Plan. All STA employees are required to attend Anti-Discrimination, Harassment Prevention ("ADHP") training. Newly hired or promoted managers and supervisors attend EEO training within 90 days of their appointment and every other year thereafter.

#### **Action Plan**

The EEO Officer will begin to provide ADHP training to STA managers and supervisors, including specialized ADHP training programs for managers and supervisors and employees.

#### 2. Skill based training

STA training programs and external training opportunities are open to all employees. Each employee can pursue training that is appropriate to his/her position, skills, and individual/unique developmental needs as assessed and approved by his/her supervisor/manager. STA training programs can provide foundation skills that can be used to build quality performance on the job. At the same time, managers and supervisors can obtain training to gain an enhanced understanding of their professional areas through multi-level course offerings, conferences, and continuing education. STA takes pride in having a skilled workforce and has ensured that it continues by making "Trained" a part of our core values.

In 2020, Officials and Administrators and Professionals were provided numerous opportunities to attend various conferences and skills trainings throughout the year. For example, employees attended Labor Relations Training, the APTA Legislative Conference, Tyler Technologies Conference, 2020 Fraud Conference, Title VI training.

Technicians had the opportunity to attend a variety of training as well. Training provided includes Anti-Harassment and Discrimination training, ADA training, Reasonable Suspicion training, 2020 Think Transit conference, Administering SQL Database Infrastructure, Comp TIA Security & Certification, Cisco Live, and Network Administration online training.

Protective Services attended SPOT training.

Administrative Support trainings in 2020 Microsoft Outlook Training, Executime Training, Creating a Memorable Customer Experience, 2020 Tyler Technologies Conference, September Service Change with Planning, and ADA training.

Most Skilled Craft workers and Service Maintenance employees at STA also received some training related to their respective job duties and responsibilities including general annual training, inspection training, Advanced C.O.P. Training, and other technical training.

**In some job categories, STA has identified a potential negative impact in certain groups of employees:**

- Officials and Administrators: White males, multiracial males;
- Professionals: White males and females;
- Technicians: White males, American Indian males, black males, Hispanic males Asian males, NHOPI males, and Multiracial females;
- Protective Service: White males;
- Administrative Support: White males
- Skilled Craft: White males, and Asian males; and
- Service Maintenance: White males, black males, Hispanic males.

**Action Plan:** STA employs a variety of teaching methods—classroom, web-based, and self-guided learning. STA has already begun a tracking and monitoring system to insure that all employees at STA are trained and appropriately updated on trainings related to STA policies as well as trainings related to each employee's field. The EEO Officer monitor the dissemination methods of all such trainings to ensure that all employees are aware of the opportunities for training in their specific fields to potentially advance their careers. STA will continue to build the menu of courses based on the needs of employees.

## **VI. EMPLOYMENT PRACTICES NARRATIVE**

### **A. Hiring Analysis**

There is no authority-wide hiring plan. There are only segmented departmental hiring requests. STA hiring is primarily governed by collective bargaining agreements.

### **B. Recruitment/Outreach**

A recruitment committee comprised of recruiters from the Human Resources department and the EEO Officer that meets weekly to discuss specific recruitment efforts for specific positions as well as global outreach and partnership building with community organizations.

STA's hiring process consists mostly of posting and interview processes, with the exception of labor & maintenance jobs.

When hiring for a union position, STA will review the applicable Collective Bargaining Agreement (CBA) to determine if any special rules are associated with the position. If no rules agreement exists for the position, Human Resources will utilize a competitive recruitment effort which will be open to both internal and external applicants and follow the same process and any non-represented positions.

Regardless of the manner in which vacancies are filled, there is an internal approval process that includes the EEO Officer's approval throughout the process. The filling of any positions must also adhere to applicable state laws, collective bargaining agreements, and external approvals, if necessary.

STA has several methods of filling positions that include: seniority, occasional appointment and other selection processes.

### **C. Posting Procedures and Job Description**

STA's job posting procedure starts with requests for posting from the relevant department director or hiring manager. The job description is approved by the EEO Officer before posting.

STA job descriptions set forth what a job entails to determine the necessary and desired qualifications of the candidate. Job descriptions are pivotal in developing the screening criteria, preparing the questions for the interview and finally in the selection process. The job description describes all the work the position involves in detail.

New job descriptions should be reviewed by the EEO Officer before being finalized. Writing job descriptions is an important step in the STA's staffing program. They form the foundation for many important processes such as job postings, recruitment, selection, setting expectations,

compensation, training and performance management. Job descriptions give a brief overview of the employee's role, a list of key responsibilities, requirements and qualifications.

The following information is typically contained in a job description:

- A job title and grade within the agency;
- The responsibilities of the job (distinguish between those functions that are essential to the job and those that are marginal);
- Minimum entrance requirements (MERs);
- Knowledge, skills, abilities (KSAs);
- Special requirements;
- Preferred qualifications the critical success indicators;
- The formal reporting relationship;
- Working conditions, including hours of work, physical and mental demands;
- With whom will the person come in contact (external and internal); and
- Support, authority, and resources necessary and available to do the job.

For union represented maintenance positions, when a vacancy occurs, it is posted for bid within the pertinent department prior to being made available to other STA employees. Interested department employees must make known their desire for consideration by providing notice (application) to the department head.

Last, all job postings will contain the language "Spokane Transit is an Equal Employment Opportunity Employer."

#### **D. Employment Application Form**

Applicants may apply for posted positions by submitting an application and/or resume via the STA website. All applicants are strongly encouraged to use the STA website to apply for posted positions, unless an applicant with a disability asks to submit his/her application in an alternative format. The statement "The STA is an Equal Opportunity Employer" is on the STA application form and online application. Upon request, the paper application form is provided for those who specifically request it.

#### **E. Review of Candidate Pool**

An HR specialist identifies candidates to be interviewed by screening applications/resumes against the Minimum Entrance Requirements (MERs) listed on the posting. Applicant pools for specific postings are broken down into the following categories and sent to the EEO Officer: Applicants who applied for the position; and Applicants who met the MERs and were referred for consideration. The HR specialist and EEO Officer work together to ensure that the applicant pool reflects the diversity of the available labor force.

For union maintenance positions, STA conducts an examination for purposes of determining the qualifications of those employees who made application. When qualified interested employees are available, the job will be assigned according to seniority, qualifications, ability, and results of the examination. Should no one within the pertinent department apply or qualify for an open position, the vacancy will be made available, by posting, to other STA employees and/or to the



general public. If prior to posting and after consultation with the union it is agreed that no one within the department is deemed qualified to bid an opening, the department head may consider and employ other qualified personnel in the manner as provided for in this Plan. A union employee failing to qualify for a new job within one hundred eighty (180) days shall return to his/her former position.

For union customer service and clerical positions, when a vacancy occurs, it shall be posted first within the pertinent department prior to being made available, as appropriate, to other clerical departments or STA employees. Interested employees within the department, as appropriate, must make known their desire for consideration by providing notice (application) to the management official named in the notice and within the time frame specified. STA will conduct an examination (oral or written) for purposes of determining the qualifications of those employees who made application. When qualified, interested employees are available, the job will be assigned according to seniority, qualifications, ability and results of the examination. Should no one within the department apply or qualify for an open position, the vacancy will be made available, by posting, to other STA employees and to the general public. If prior to posting, it is deemed that no one within the department is qualified, STA may consider and employ other qualified personnel. An employee failing to qualify for a new job within ninety (90) days shall return to his/her former position.

## **F. Interview Procedure**

STA has standard interview practices in place. Interview questions are reviewed by HR against the posting for relevance and fairness. Applicants selected to be interviewed are asked the same questions by the same interview committee and scoring for each question is defined before the interview process begins.

Managers are required to follow the procedures outlined in the STA's "Interview Toolkit," which is tailored for each position and category. The EEO Officer also approves the general interview questions provided to the interview committee in the Interview Toolkit which serves as a guide for the interviewers.

## **G. Employment Testing**

As a method to determine preparedness for a specific position, STA may test applicant's specific skills, knowledge, or ability as they relate to the position. For example, applicants applying for administrative assistant position may be tested on Microsoft Word and Excel if the position requires such skill. Applicants for Maintenance Equipment Operator positions are given a practical test that requires them to drive machinery that requires a hoisting license.

STA administers pre-employment and promotional exams for a variety of positions. These exams include, but are not limited to: CDL exam testing, PM tech testing, and general repair tech testing.

For union positions, examinations for vacancies will be filled in the following priority:

- 1) Grandfathered employees in respective department. If not filled by grandfathered employee that open position becomes a combo position.

- 2) Organization wide
- 3) External recruitment

## **H. Selection Standards and Procedures**

The STA hiring manager, upon receiving the necessary approval from his/her supervising manager, compiles a hiring package that includes a cover memo signed by the hiring manager with the justification for his/her recommendation, responses to the interview questions and candidates' resumes/applications. Depending on the positions, a scoring sheet may also be included in the package, which is forwarded to the EEO Officer for review and approval. The hiring package is not forwarded to the next level of review and approval unless the EEO Officer is satisfied that the selection process is consistent with the EEO Program and guidelines.

STA has standardized its selection practices to ensure compliance with its EEO Program. After the interview, HR reviews candidate answers with the selection committee members to ensure that responses are captured accurately and completely. The HR Recruiter directs the selection committee members to discuss and evaluate the responses a candidate gave to the interview questions and ensures that all candidates are given appropriate consideration and are rated on their responses to the job-related questions. The HR Recruiter facilitates selection committee discussion leading to candidate recommendation(s.)

## **I. Job Offer/Approval**

The process for a job offer requires approval from the EEO Officer, HR and in some cases the Chief Executive Officer, Chief Financial Officer or designee.

## **J. New Employee Orientation/Onboarding**

On the first day of work all new hires are required to attend a benefits orientation and complete employment-related documents, including a Form 1-9. Benefits administrators follow a New Hire Packet Checklist and go over each document listed on the checklist. An acknowledgment of the EEO Policy Statement and STA discrimination policies must be signed by the new hire. All policies included on the acknowledgement form are distributed to the new hire at orientation.

All new hires also attend an orientation where they are welcomed by a member of the Senior Leadership Team. Participants, receive an overview of multiple administrative departments and the services available to them. During the module delivered by the EEO Officer and/or designee, employees learn about ways to resolve complaints/conflicts and the Internal Complaint Procedure; the Anti-Discrimination and Harassment Prevention Policy, and additional services available through the EEO Officer. They also participate in the mandatory FTA Drug & Alcohol Policy.

## **VII. MONITORING AND REPORTING**

STA monitors its EEO Plan to help identify opportunities for improvement within the current implementation EEO Program. This review entails an acknowledgement of program achievements, identifies potential problems and devises recommendations for continual improvement to ensure that the program is effective and successful.

Reviews of all hiring practices are performed monthly, quarterly and annually with all STA organizational units to ensure that all equal employment opportunity policies are being followed and that work is being done to meet the STA's EEO goals.

The review includes an analysis of the reports conducted monthly for each of the employment related activities such as hires, promotions, reclassifications and terminations will help identify underlying problems associated with possible causes of underutilization and whether underutilized group members are hired or promoted at a rate that would be expected, based on the surrounding geographic or targeted recruitment area.

It is STA's policy to ensure that the organizational units within STA adhere to all laws, regulations, policies and standard operating procedures in carrying out the STA's day to day business. This Plan is necessary to ensure compliance and it provides support and assistance to remedy areas of noncompliance.

### **A. The Review Process**

STA's review process is comprised of a Consultative Process which involves the Department Directors and top management of the facility being reviewed, Human Resources Management and EEO Officer. In the review process, the management team is called upon to build on the positives of employment practices and to highlight areas for improvement, barrier elimination, succession planning, etc. The management team is expected to use review results for potential policy development and to share information with the EEO Officer on a continuous basis. The results of the review are used to determine what the managers and what the regulations require.

The review process also entails a verification process with on-site reviews by the EEO Officer, who will verify the content of the self-assessment and create audit improvement action plans and document progress.

### **B. Conducting the Review**

#### **1. Analysis of Information and Data**

The EEO Officer will conduct a review of departmental EEO Programs through analysis of:

- Statistical workforce reports, including 4/5ths analysis of employment practices
- Annual EEO Self-Assessment
- Information resulting from ongoing communication with organizational units

- Information gathered during training and/or investigation/ADR process

## 2. On-Site Reviews

On-site reviews by the EEO Officer will be scheduled at least yearly, in consultation with each department administrator and on the basis of such factors as lapsed time since last visit, and frequency of EEO complaint activity and/or general complaints with EEO implications.

### **Programs Covered During On-Site reviews:**

- Management and Implementation of the EEO Program
- Training and Development
- Recruitment and Advancement
- Complaint Prevention, Mitigation and Management

## 3. On-Site Meetings

While on site, the EEO Officer will meet with the Department Administrator, managers who report directly to the Department Administrator, and selected first level supervisors, in order to assess the implementation of the EEO Plan. These meetings and interviews will be scheduled in advance of the on-site visit. If necessary and appropriate, other meetings will be scheduled while on-site.

## 4. Additional Monitoring Activities

Employment and labor law bulletin boards in all STA locations are monitored. The bulletin boards are reviewed to ensure those federal and state labor law posters and other policies and approved EEO programs are posted in conspicuous places in all STA buildings. In posting where employees work, we ensure that employees without email/internet access are able to review those laws, policies and programs. If any bulletin board does not contain all of the required information, the bulletin board is brought into compliance immediately.

## 5. Review Reports

Review reports prepared by the EEO Officer will show clearly those program strengths and weaknesses which form the basis for an objective appraisal of the status of the EEO Program. Such reports will be brief and to the point, highlighting how well program objectives are being met. Identification of problem areas, or functions in need of improvement, will be supplemented by suggestions, recommendations and other indications concerning action to be taken to correct inadequacies and lack of compliance. Action to implement corrective measures will be monitored through the submission of reports or follow up visits, to the extent deemed necessary, for completed action or to provide additional assistance. The review reports will be submitted to the CEO and compiled and included in the submission of the EEO Plan to the FTA.

## **C. Metrics for Conducting Program Evaluations**

### **1. EEO Plan Dissemination /Implementation**

- The EEO Policy Statement is re-issued annually and communicated to all employees, unions, educational institutions, organizations for women, minority groups, individuals with a disability, veterans, community action groups, and other recruitment sources
- The EEO Officer and HR managers meet regularly to assess whether personnel programs, policies and procedures are in conformity with EEO Program and policies
- Information is made available to internal and external users regarding how to access STA's EEO Plan. STA's EEO Plan is posted on the Employee Self-Serve System (ESS) to provide employees with viewing access. For those who do not have access to the internet, a hard copy of the EEO Plan will be made available in each organizational unit. Employees and the public may also request a hard copy of the EEO Plan.

### **2. Goals and Timetables**

- HR and Hiring Managers are provided with a copy of the EEO Plan which contains the workforce utilization analysis, job group analysis, two-factor availability analysis and placement goal analysis
- Placement goals are provided to hiring managers for each job announcement
- Monthly/quarterly/annual updates and reports are provided to management staff by the EEO Officer
- Managers are evaluated and are held responsible for the successful implementation of the EEO Program in their respective area of responsibility

### **3. Recruitment and Outreach**

- Job announcements and all marketing materials are accessible to all candidates, including those with disabilities
- EEO Officer reviews and signs off on all job announcements to ensure that the job description and qualifications are job related and does not inadvertently disqualify protected group members
- HR Recruiters and/or designee attends career fairs and recruiting activities offered by high schools, vocational schools, colleges, universities and other organizations that reach females, minorities, individuals with a disability and veterans
- Advertise job announcements in newspapers, periodicals and magazines that have a large protected group member audience
- When the results of the 4/5ths analysis show evidence of potential negative impact, the EEO Officer, HR and department administrators (the Joint Recruitment Committee) will make improvements to recruitment and outreach efforts to increase the number of qualified women and minorities in our applicant pool and improve opportunities for their employment, promotion and retention.

#### 4. Selection and Hiring

- The EEO Officer shall have authority to concur on all appointments
- Appropriate training is provided to all employees who interview job applicants
- All hiring standards are fixed, reasonable, objective and job related and conforms to the EEOC's Uniform Guidelines on Employee Selection Procedures
- Employment data shall be kept for each position filled. A record of persons interviewed, accepted or refused for each new hire and promotion showing race, gender, disability and veteran status shall be maintained and analyzed using four-fifths analysis
- Analysis of the flow of applicants shall be conducted to determine reasons for the rejection of qualified applicants from underutilized groups where goals have been established or underutilization exists
- Where underutilization exists, representation of the candidate pool to be interviewed shall represent the availability for that particular area

#### 5. Job Structuring and Upward Mobility

- HR and EEO Officer ensure that job classifications are current, job duties and qualifications are job-related
- Working with HR and Department Directors to discuss opportunities for entry level positions to progress within occupational areas
- HR and EEO Officer reviews union contracts to ensure there is no potential negative impact

#### 6. Retention

- Analysis of agency turnover is conducted to identify and advise senior leadership of trends and solutions
- A work plan is developed to reduce turnover

#### 7. Mandatory EEO Program Training

- Training for all managers, supervisors and those who are involved in the employee selection process are completed by the first year of the implementation of the EEO Program.
- The training course designed for managers/supervisors covers lessons on the EEO Program and its implementation, applying EEO principles in hiring decisions, civil rights laws, and how the complaint process.
- The training course designed for bargaining unit employees covers lessons on the value of diversity, workplace harassment laws and forms of harassment.
- Information is made available to internal and external users regarding how to access STA's EEO Plan. STA's EEO Plan is posted on the Employee Self-Serve System (ESS) to provide employees with viewing access. For those who do not have access to the internet, a hard copy of the EEO Plan will be made available in each organizational unit. Employees and the public may also request a hard copy of the program.
- Every year, the EEO Officer attends training to increase knowledge, skill and ability in equal employment opportunity.

## 8. EEO Complaint Procedure

- The EEO Program procedures for filing a complaint is disseminated to all employees.
- Training of EEO Officer and staff and employees on the complaint procedure is completed within one year of the implementation of the EEO Program.
- EEO Program and Complaint procedure is communicated to all new employees during orientation.
- Information is made available to internal and external users on the STA complaint procedure. Complaint Unit's email address and 800 number is disseminated to all employees.
- A complaint tracking system is used to identify issues and bases of complaints, ensures that complaints are processed in a timely manner, and an appropriate resolution/disciplinary action is reached at the conclusion of the investigation.

## **VIII. COMPLIANCE REVIEWS**

STA is responsible for both its own compliance and for assuring the FTA that all sub-recipients of funds are in compliance with the FTA's EEO provisions under Section 19 of the Urban Mass Transportation Act of 1964 which states that:

"No person in the United States shall on the grounds of race, color, creed, national origin, sex, age, or disability be excluded from participation in, or denied the benefits of, or be subject to discrimination under any project, program or activity funded in whole or in part through financial assistance under this Act."

### **D. Sub-Recipient Management**

If any sub-recipient meets the threshold established by FTA (receipt of \$1,000,000 or more in the previous Federal fiscal year, and employs 50 or more mass transit related employees), it must submit an EEO Plan. The state may require any documentation it deems necessary from sub-recipients to ensure that they do not discriminate in employment on the basis of race, color, creed, national origin, sex, age, or disability. The FTA will review sub-recipient programs during the state management review or other compliance reviews.

Pursuant to STA's policies regarding this requirement, each sub-recipient, who meets the applicable threshold, must sign an assurance that they will follow federal and state guidelines, including but not limited to Section 19 of the UMT Act of 1964. STA requires all applicants and/or sub-recipients to provide information as described in the Circular.

STA's EEO Officer will coordinate efforts to monitor sub-recipient compliance by working with the appropriate program staff to identify applicants and sub-recipients of FTA funds on a regular basis. STA's EEO Officer will contact the respective applicant or sub-recipient to inform them of their obligation and will provide technical assistance as needed.

In addition, all bids for contracts submitted by the subcontractors include language about the STA's commitment to EEO:

STA is an Equal Opportunity Employer. As such, STA agrees to comply with all applicable Federal civil rights laws and implementing regulations. Apart from inconsistent requirements imposed by Federal laws or regulations, STA agrees to comply with the requirements of 49 USC. § 5323(h) (3) by not using any Federal assistance awarded by FTA to support procurements using exclusionary or discriminatory specifications.

### **E. Sub-Contractor Management**

STA ensures that sub-recipients meeting the thresholds that require submission of an EEO Plan provide STA with the plan for review and approval. The following is a summary of the process:



STA Transit Grant Program Managers provide the STA EEO Officer with a list of sub-recipients who are:

- Requesting or receiving capital or operating assistance in excess of \$1 million in the previous Federal fiscal year; or
- Requesting or receiving planning assistance in excess of \$250,000 in the previous Federal fiscal year.
- STA EEO Officer sends a letter and an email to the sub-recipient that meets the dollar threshold to complete the STA's EEO Monitoring Tool. If the sub-recipient meets the dollar threshold and employs 50 or more transit-related employees, the sub-recipient will be asked to submit an EEO Plan.
- The EEO Officer will review the sub-recipient's EEO Plan for compliance with the FTA Circular 4704. If there are areas in the EEO Plan that require further development or correction, the EEO Officer will notify the sub-recipient to encourage its compliance with the EEO requirements.
- Sub-recipients meeting the EEO Circular threshold requirements will be required to submit updates of the EEO Plan as major changes occur to the workforce or employment conditions. The update shall contain the following information:
  - Workforce Analysis and adverse impact analysis;
  - Assessment of EEO accomplishments, including goals, timetables and EEO programs and initiatives; and
  - Identification of Problem Areas.
- Where problem areas are identified, a corrective action plan will be requested. The EEO Officer will confer with the CEO to determine if any of the plans should be submitted to FTA.

### **Sub-recipients/Sub-contractors Monitored for EEO Compliance**

Spokane Transit Authority does not have any sub-recipients or sub-contractors which meet or exceed funding thresholds. There for, Spokane Transit Authority does not currently monitor any organization for EEO compliance.

## **List of Appendices**

### Required Attachments

1. Appendix A- Utilization Analysis
2. Appendix B- Employment Practices Review
3. Appendix C- List of subrecipients and contractors who are being monitored and the services they provide
4. Appendix D- Proof of review of subrecipients and contractors' EEO Plan (e.g. letter or memo to the subrecipient)
5. Appendix E- 2020 Organization Chart
6. Appendix F- A copy of the goals and timetables from the previous program submission

## **STATEMENT OF NON-ADMISSION**

It is understood that this EEO Plan, or any part thereof, does not constitute an admission by STA of any violation of Executive Order 11246, as amended, Section 503 of the Rehabilitation Act of 1973, as amended, the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, Title VII of the Civil Rights Act of 1964, or any federal, state or local law and has been developed to reaffirm STA's policy of providing equal employment opportunity for all persons without regard to race, national origin, religion, age, color, sex, sexual orientation, gender identity, disability, or protected veteran status, or any other characteristic protected by local, state, or federal laws, rules, or regulations. Goals have been established, where appropriate, to endeavor to meet equal employment principles and obligations. This EEO Plan is not intended to and will not be used to discriminate against any applicant or employee because of race, national origin, religion, age, color, sex, sexual orientation, gender identity, disability, or protected veteran status, or any other characteristic protected by local, state, or federal laws, rules, or regulations.











Appendix B  
Four-Fifths Adverse Impact Analysis by Job Category  
Hires

Job Category (Use EEO-4)	Total		W		A/IAN		B		H/L		A		NHOP1		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
<b>1 - Officials &amp; Administrators</b>																
Number Applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Hires	2	-	2	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>2 - Professionals</b>																
Number Applied	235	144	193	114	1	4	10	11	12	2	5	4	-	1	14	8
Total Hires	2	4	2	3	-	-	1	-	-	-	-	-	-	-	-	-
Selection Rate	0.9%	2.8%	1.0%	2.6%	N/A	N/A	0.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	N/A	0.0%	0.0%
Ratio to Highest Rate	30.6%	100.0%	39.4%	100.0%	N/A	N/A	0.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	N/A	0.0%	0.0%
Potential Adverse Impact (Yes/No)	Yes	No	Yes	No	N/A	N/A	Yes	Yes	Yes	N/A	N/A	N/A	N/A	N/A	Yes	Yes
<b>3 - Technicians</b>																
Number Applied	165	13	118	7	1	1	4	1	14	1	10	2	1	-	17	1
Total Hires	3	-	3	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	1.8%	0.0%	2.5%	0.0%	N/A	N/A	0.0%	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	0.0%	N/A
Ratio to Highest Rate	100.0%	NA	100.0%	0.0%	N/A	N/A	0.0%	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	0.0%	N/A
Potential Adverse Impact (Yes/No)	No	No	Yes	Yes	N/A	N/A	Yes	N/A	Yes	N/A	Yes	N/A	N/A	N/A	Yes	N/A
<b>4 - Protective Service</b>																
Number Applied	136	7	104	6	2	-	4	-	9	-	6	-	2	-	9	1
Total Hires	3	-	2	-	-	-	-	-	-	-	-	-	-	-	1	-
Selection Rate	2.2%	0.0%	1.9%	0.0%	N/A	N/A	0.0%	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	11.1%	N/A
Ratio to Highest Rate	100.0%	NA	17.3%	0.0%	N/A	N/A	0.0%	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	100.0%	N/A
Potential Adverse Impact (Yes/No)	No	No	Yes	Yes	N/A	N/A	Yes	N/A	Yes	N/A	Yes	N/A	N/A	N/A	No	N/A
<b>5 - Paraprofessional</b>																
Number Applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Hires	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>6 - Administrative Support</b>																
Number Applied	98	184	69	151	2	-	6	3	9	16	1	1	-	-	11	13
Total Hires	-	1	-	1	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	0.0%	0.5%	0.0%	0.7%	N/A	N/A	0.0%	N/A	0.0%	0.0%	N/A	N/A	N/A	N/A	0.0%	0.0%
Ratio to Highest Rate	NA	100.0%	0.0%	100.0%	N/A	N/A	0.0%	N/A	0.0%	0.0%	N/A	N/A	N/A	N/A	0.0%	0.0%
Potential Adverse Impact (Yes/No)	No	No	Yes	No	N/A	N/A	Yes	N/A	Yes	Yes	N/A	N/A	N/A	N/A	Yes	Yes
<b>7 - Skilled Craft</b>																
Number Applied	70	6	48	1	2	-	6	2	3	1	-	-	3	-	8	2
Total Hires	2	-	1	-	-	-	-	-	-	-	-	-	-	-	1	-
Selection Rate	2.9%	0.0%	2.1%	N/A	0.0%	N/A	0.0%	0.0%	0.0%	N/A	N/A	N/A	0.0%	N/A	12.5%	0.0%
Ratio to Highest Rate	100.0%	NA	16.7%	N/A	0.0%	N/A	0.0%	0.0%	0.0%	N/A	N/A	N/A	0.0%	N/A	100.0%	0.0%
Potential Adverse Impact (Yes/No)	No	No	Yes	N/A	Yes	N/A	Yes	Yes	Yes	N/A	N/A	N/A	Yes	N/A	No	Yes
<b>8 - Service-Maintenance</b>																
Number Applied	704	145	539	107	7	4	47	13	53	10	14	-	3	1	41	10
Total Hires	36	16	31	10	-	1	1	2	2	-	1	-	-	-	1	3
Selection Rate	5.1%	11.0%	5.8%	9.3%	N/A	N/A	2.1%	N/A	3.8%	N/A	N/A	N/A	N/A	N/A	2.4%	N/A
Ratio to Highest Rate	46.3%	100.0%	61.5%	100.0%	N/A	N/A	22.8%	N/A	40.4%	N/A	N/A	N/A	N/A	N/A	26.1%	N/A

**Appendix B**  
**Four-Fifths Adverse Impact Analysis by Job Category**  
**Hires**

Job Category (Use EEO-4)	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Potential Adverse Impact (Yes/No)	Yes	No	Yes	No	N/A	N/A	Yes	N/A	Yes	N/A	N/A	N/A	N/A	N/A	Yes	N/A

Notes:

Persons with Disabilities	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Number Applied	49	13	36	4	-	-	2	-	3	-	-	-	-	-	8	3
Total Hires	2	4	2	3	-	-	-	-	-	-	6	-	-	-	-	1
Selection Rate	4.1%	30.8%	5.6%	75.0%	N/A	N/A	0.0%	N/A	0.0%	N/A	N/A	0.0%	N/A	N/A	0.0%	33.3%
Veterans	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Number Applied	96	3	66	3	-	-	4	-	5	-	6	-	-	-	15	-
Total Hires	11	1	8	1	-	-	-	-	2	-	-	-	-	-	1	-
Selection Rate	11.5%	33.3%	12.1%	33.3%	N/A	N/A	0.0%	N/A	40.0%	N/A	0.0%	N/A	N/A	N/A	6.7%	N/A

Notes:





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

Job Category (Use EEO-4)	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Notes:

Persons with Disabilities	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Number Applied	2	-	2	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Promotions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Veterans	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Number Applied	8	1	3	-	-	-	-	-	-	1	-	-	-	-	3	-
Total Promotions	-	1	-	-	-	-	-	-	-	1	-	-	-	-	-	-
Selection Rate	0.0%	100.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A	N/A	N/A	0.0%	N/A

Notes:

Appendix B  
Four-Fifths Adverse Impact Analysis by Job Category  
Training

Job Category (Use EEO-4)	Total		W		A/I/AN		B		H/L		A		NHOP		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
<b>1 - Officials &amp; Administrators</b>																
Total Workforce	12	7	11	7	-	-	-	-	-	-	-	-	-	-	1	-
Total Trained	19	28	17	28	-	-	-	-	-	-	-	-	-	-	-	2
Training Rate	158.3%	400.0%	154.5%	400.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	200.0%	N/A
Ratio to Highest Rate	39.6%	100.0%	38.6%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	50.0%	N/A
Potential Adverse Impact (Yes/No)	Yes	No	Yes	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Yes	N/A
<b>2 - Professionals</b>																
Total Workforce	19	22	19	21	-	-	-	-	-	1	-	-	-	-	-	-
Total Trained	12	33	12	31	-	-	-	-	-	2	-	-	-	-	-	-
Training Rate	63.2%	150.0%	63.2%	147.6%	N/A	N/A	N/A	N/A	N/A	200.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	42.1%	100.0%	31.6%	73.8%	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	Yes	No	Yes	Yes	N/A	N/A	N/A	N/A	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A
<b>3 - Technicians</b>																
Total Workforce	41	3	31	2	1	-	3	-	2	-	3	-	1	-	-	1
Total Trained	70	10	53	8	1	-	6	-	1	-	9	-	-	-	-	2
Training Rate	170.7%	333.3%	171.0%	400.0%	100.0%	N/A	200.0%	N/A	50.0%	N/A	300.0%	N/A	0.0%	N/A	N/A	200.0%
Ratio to Highest Rate	51.2%	100.0%	42.7%	100.0%	25.0%	N/A	50.0%	N/A	12.5%	N/A	75.0%	N/A	0.0%	N/A	N/A	50.0%
Potential Adverse Impact (Yes/No)	Yes	No	Yes	No	Yes	N/A	Yes	N/A	Yes	N/A	Yes	N/A	Yes	N/A	N/A	Yes
<b>4 - Protective Service</b>																
Total Workforce	11	1	10	1	-	-	-	-	-	-	-	-	-	-	-	1
Total Trained	5	1	4	1	-	-	-	-	-	-	-	-	-	-	-	1
Training Rate	45.5%	100.0%	40.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.0%	N/A
Ratio to Highest Rate	45.5%	100.0%	40.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.0%	N/A
Potential Adverse Impact (Yes/No)	Yes	No	Yes	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	No	N/A
<b>5 - Paraprofessional</b>																
Total Workforce	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Trained	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Training Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>6 - Administrative Support</b>																
Total Workforce	11	41	10	38	-	1	1	-	-	1	-	1	-	-	-	-
Total Trained	5	81	5	73	-	-	-	-	-	8	-	-	-	-	-	-
Training Rate	45.5%	197.6%	50.0%	192.1%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	23.0%	100.0%	26.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	Yes	No	Yes	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>7 - Skilled Craft</b>																
Total Workforce	51	1	45	-	-	-	-	-	3	-	3	-	-	-	-	1
Total Trained	239	30	191	2	-	-	-	-	45	-	3	-	-	-	-	28
Training Rate	468.6%	3000.0%	424.4%	N/A	N/A	N/A	N/A	N/A	1500.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	15.5%	100.0%	28.3%	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	6.7%	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	Yes	No	Yes	N/A	N/A	N/A	N/A	N/A	No	N/A	Yes	N/A	N/A	N/A	N/A	N/A
<b>8 - Service-Maintenance</b>																
Total Workforce	291	100	254	90	3	1	12	2	15	2	4	1	2	-	1	4
Total Trained	1,506	808	1,232	596	28	81	28	18	31	3	110	2	48	-	29	108
Training Rate	517.5%	808.0%	485.0%	662.2%	N/A	N/A	233.3%	N/A	206.7%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	64.1%	100.0%	73.2%	100.0%	N/A	N/A	35.2%	N/A	31.2%	N/A	N/A	N/A	N/A	N/A	N/A	N/A

**Appendix B**  
**Four-Fifths Adverse Impact Analysis by Job Category**  
**Training**

Job Category (Use EEO-4)	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Potential Adverse Impact (Yes/No)	Yes	No	Yes	No	N/A	N/A	Yes	N/A	Yes	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Notes:





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

Job Category (Use EEO-4)	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
<b>5 - Paraprofessional</b>																
Total Workforce	-	-														
Total Involuntary Terminations	-	-														
Involuntary Termination Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>6 - Administrative Support</b>																
Total Workforce	11	41	10	38		1	1			1						
Total Involuntary Terminations	-	-				1	1			1			1			
Involuntary Termination Rate	0.0%	0.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	100.0%	100.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>7 - Skilled Craft</b>																
Total Workforce	51	1	45						3		3					1
Total Involuntary Terminations	2	-	2													
Involuntary Termination Rate	3.9%	0.0%	4.4%	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	0.0%	100.0%	0.0%	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	N/A	N/A	N/A	N/A	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A
<b>8 - Service-Maintenance</b>																
Total Workforce	291	100	254	90	3	1	12	2	15	2	4	1	2		1	4
Total Involuntary Terminations	6	2	6	1											1	
Involuntary Termination Rate	2.1%	2.0%	2.4%	1.1%	N/A	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	1	
Ratio to Lowest Rate	97.0%	100.0%	0.0%	0.0%	N/A	N/A	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Notes:











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

Potential Adverse Impact (Yes/No)	No	No	No	N/A	N/A	N/A	N/A	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A
<b>Suspension</b>	1	-	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	2.0%	0.0%	2.2%	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	0.0%	100.0%	0.0%	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	N/A	N/A	N/A	N/A	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	0.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	100.0%	100.0%	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	N/A	N/A	N/A	N/A	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	0.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	100.0%	100.0%	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	N/A	N/A	N/A	N/A	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A
<b>8 -Service-Maintenance</b>																	
Total Workforce	291	100	254	90	3	1	12	2	15	2	4	1	2			1	4
<b>Verbal Warning</b>	1	2	1	2													
Discipline Rate	0.3%	2.0%	0.4%	2.2%	N/A	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	17.2%	0.0%	0.0%	N/A	N/A	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A
<b>Written Warning</b>	18	6	15	5	1				2	1							
Discipline Rate	6.2%	6.0%	5.9%	5.6%	N/A	N/A	0.0%	N/A	13.3%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	97.0%	100.0%	0.0%	0.0%	N/A	N/A	100.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A
<b>Reprimand</b>	26	13	23	11					3	2							
Discipline Rate	8.9%	13.0%	9.1%	12.2%	N/A	N/A	0.0%	N/A	20.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	68.7%	0.0%	0.0%	N/A	N/A	100.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A
<b>Suspension</b>	7	3	7	3													
Discipline Rate	2.4%	3.0%	2.8%	3.3%	N/A	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	80.2%	0.0%	0.0%	N/A	N/A	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	0.0%	0.0%	0.0%	0.0%	N/A	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	100.0%	100.0%	100.0%	N/A	N/A	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	0.0%	0.0%	0.0%	0.0%	N/A	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	100.0%	100.0%	100.0%	N/A	N/A	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A

Notes:

## **Appendix C**

### **Sub-recipients/Sub-contractors Monitored for EEO Compliance**

Spokane Transit Authority contracted with First Transit in 2020 to provide transit related services. However, First Transit did not receive federal funding from STA.



## **Appendix D**

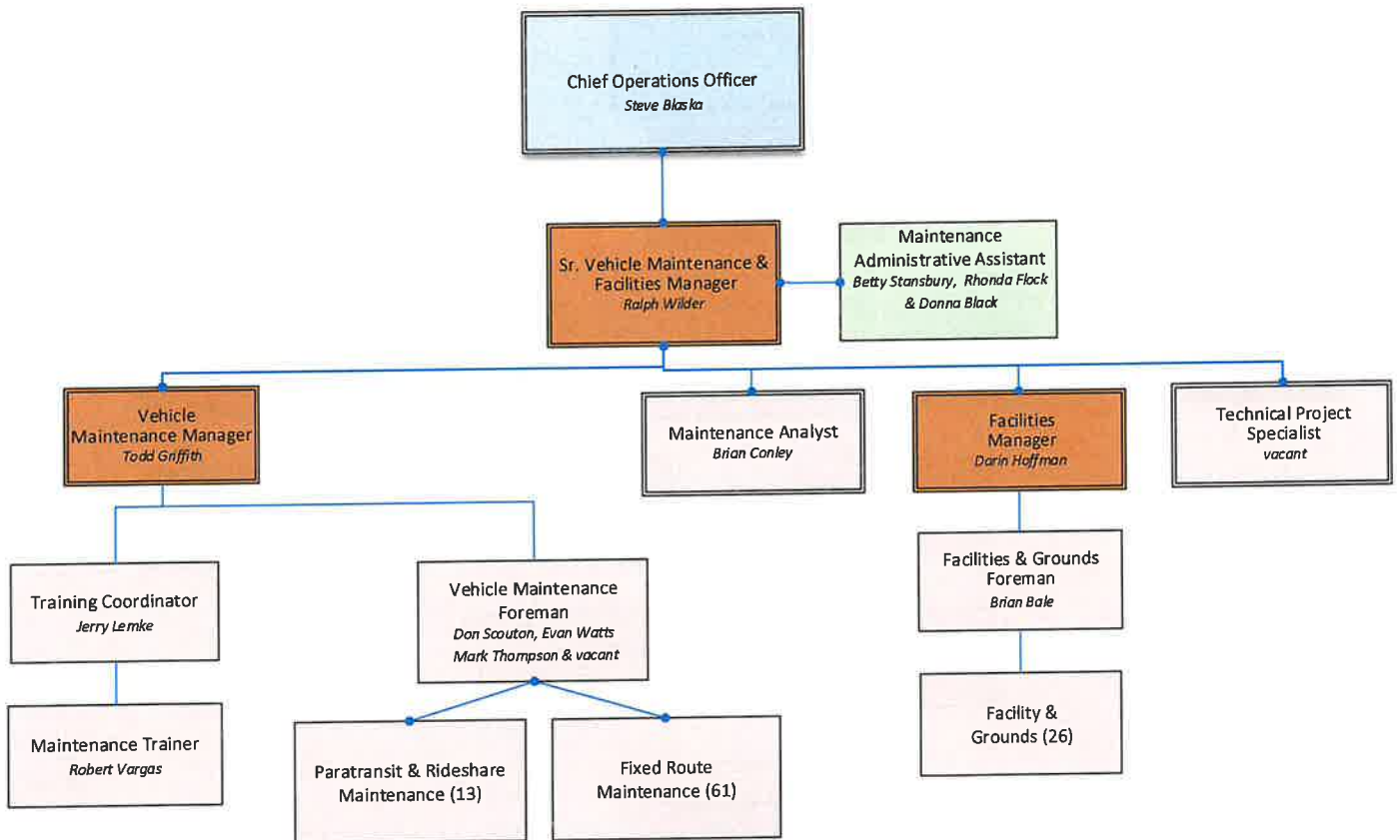
### **Sub-recipients/Sub-contractors Monitored for EEO Compliance**

Spokane Transit Authority contracted with First Transit in 2020 to provide transit related services. However, First Transit did not receive federal funding from STA.

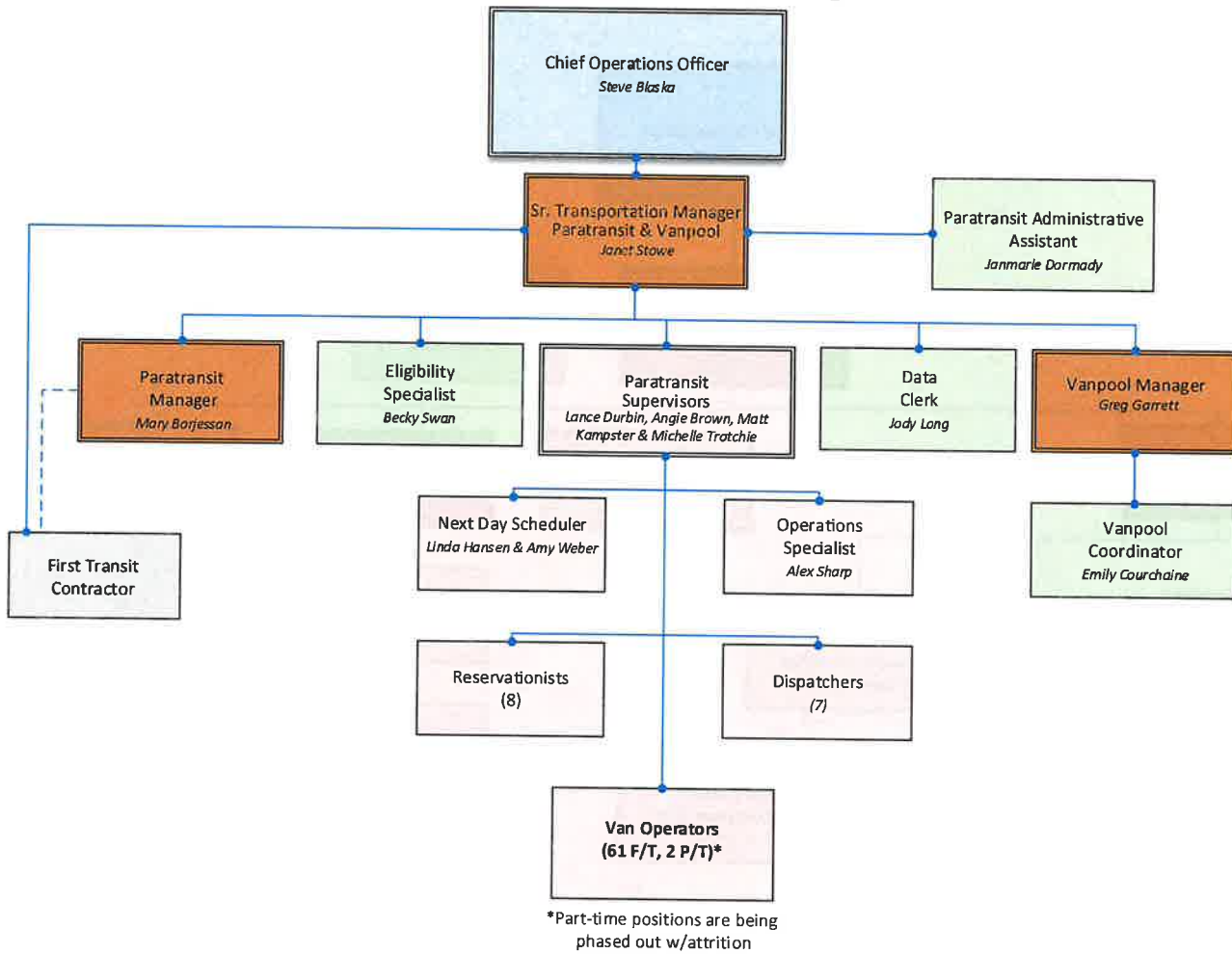




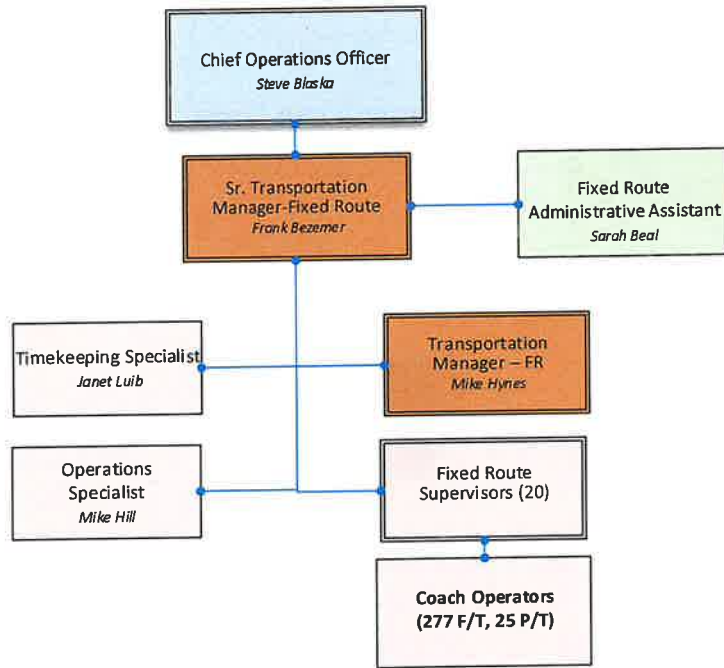
## Appendix E-2020 Spokane Transit Organization Chart



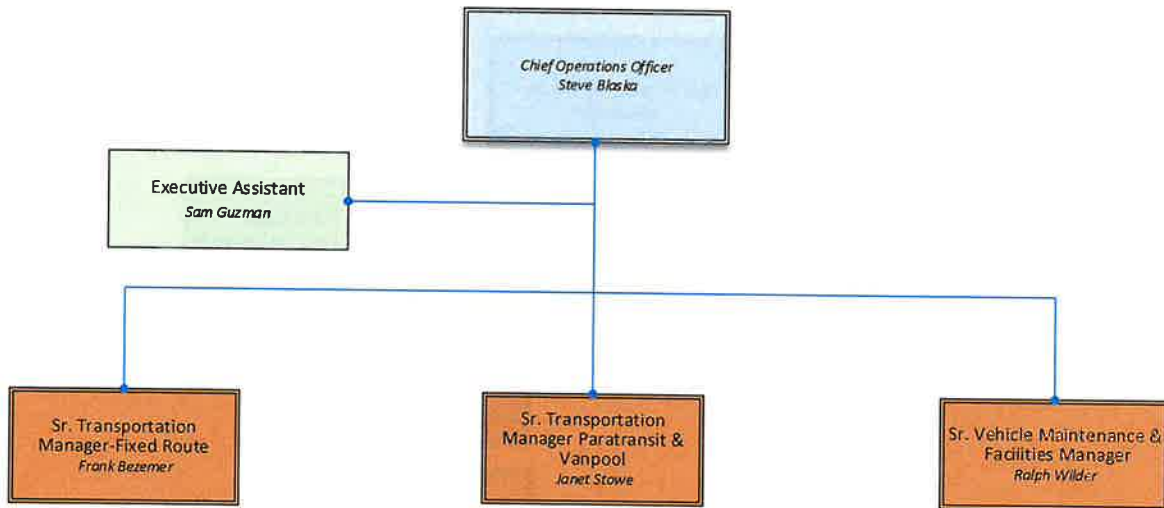
### Appendix E-2020 Spokane Transit Organization Chart



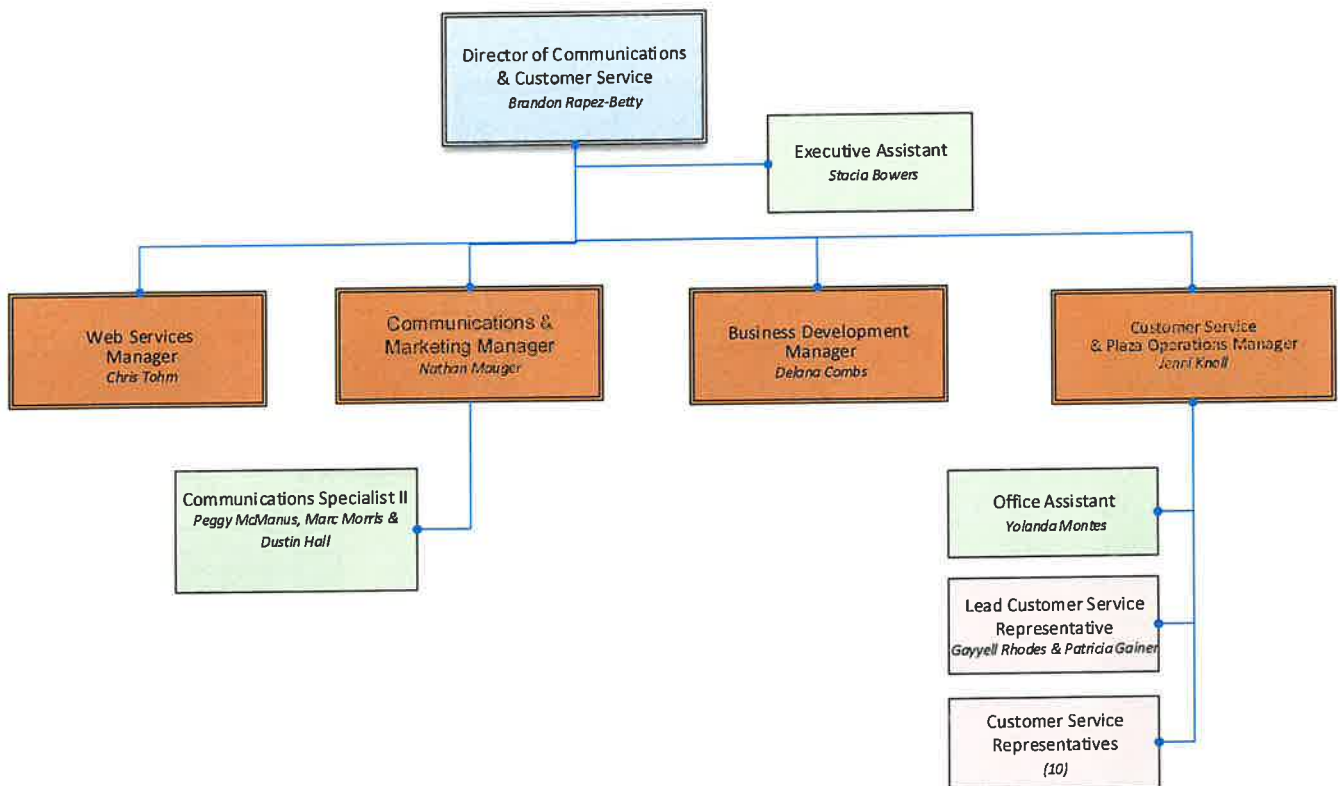
## Appendix E-2020 Spokane Transit Organization Chart



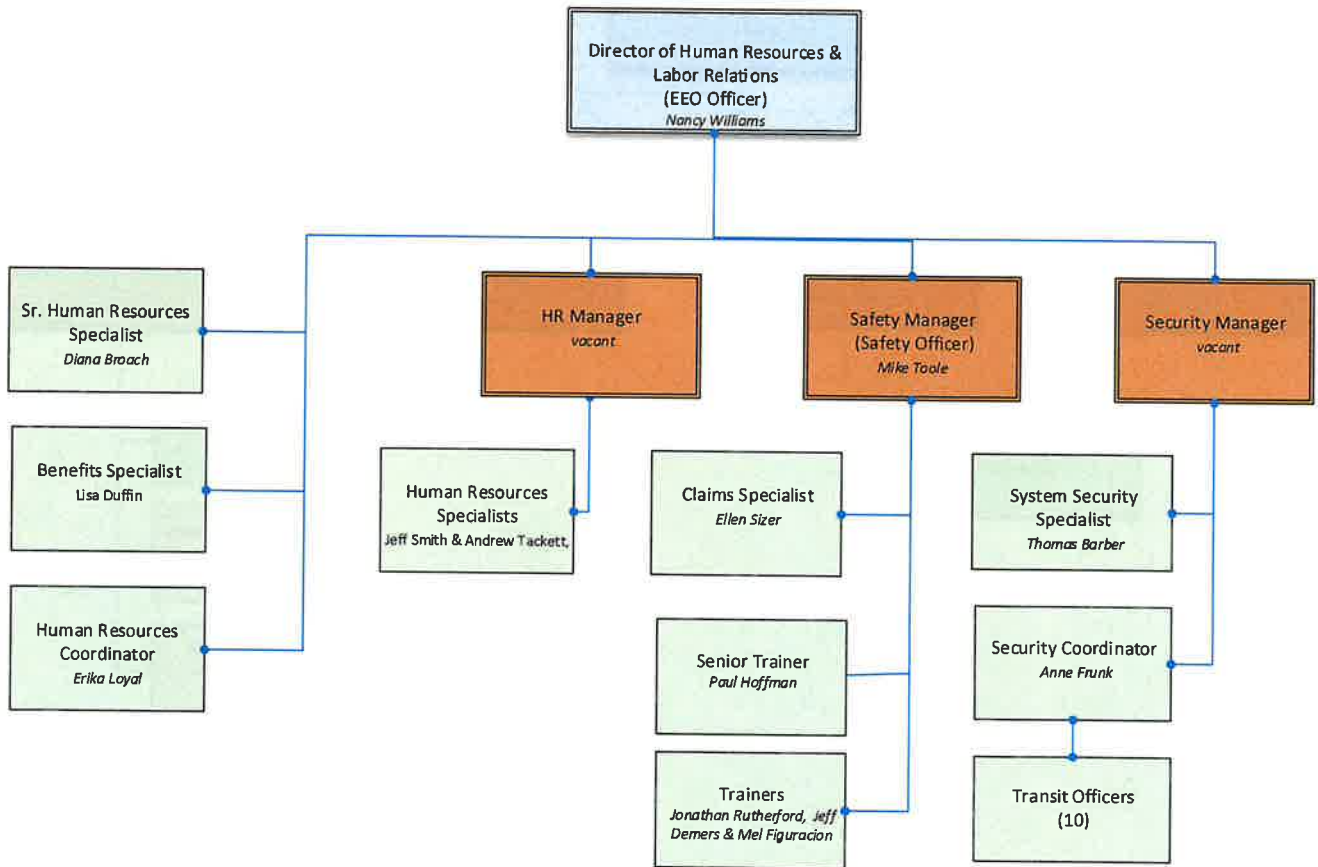
Appendix E-2020 Spokane Transit Organization Chart



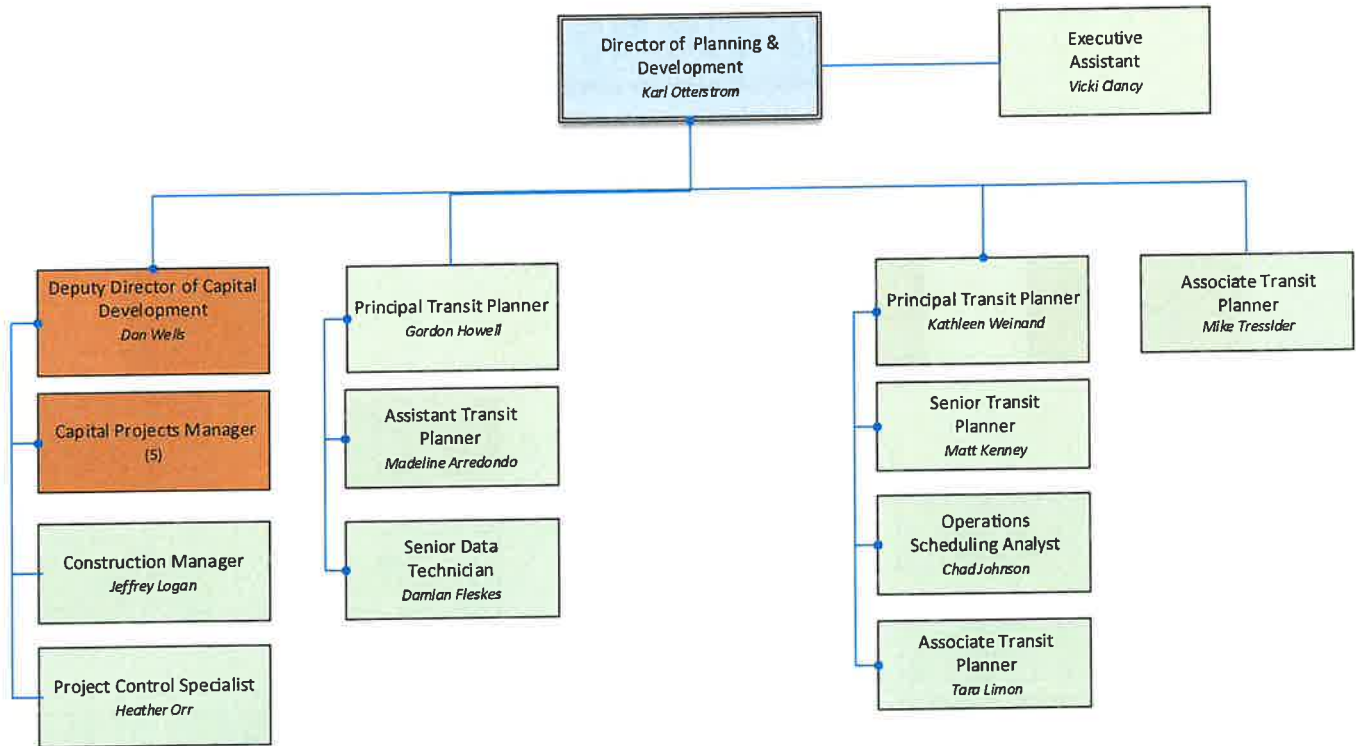
Appendix E-2020 Spokane Transit Organization Chart



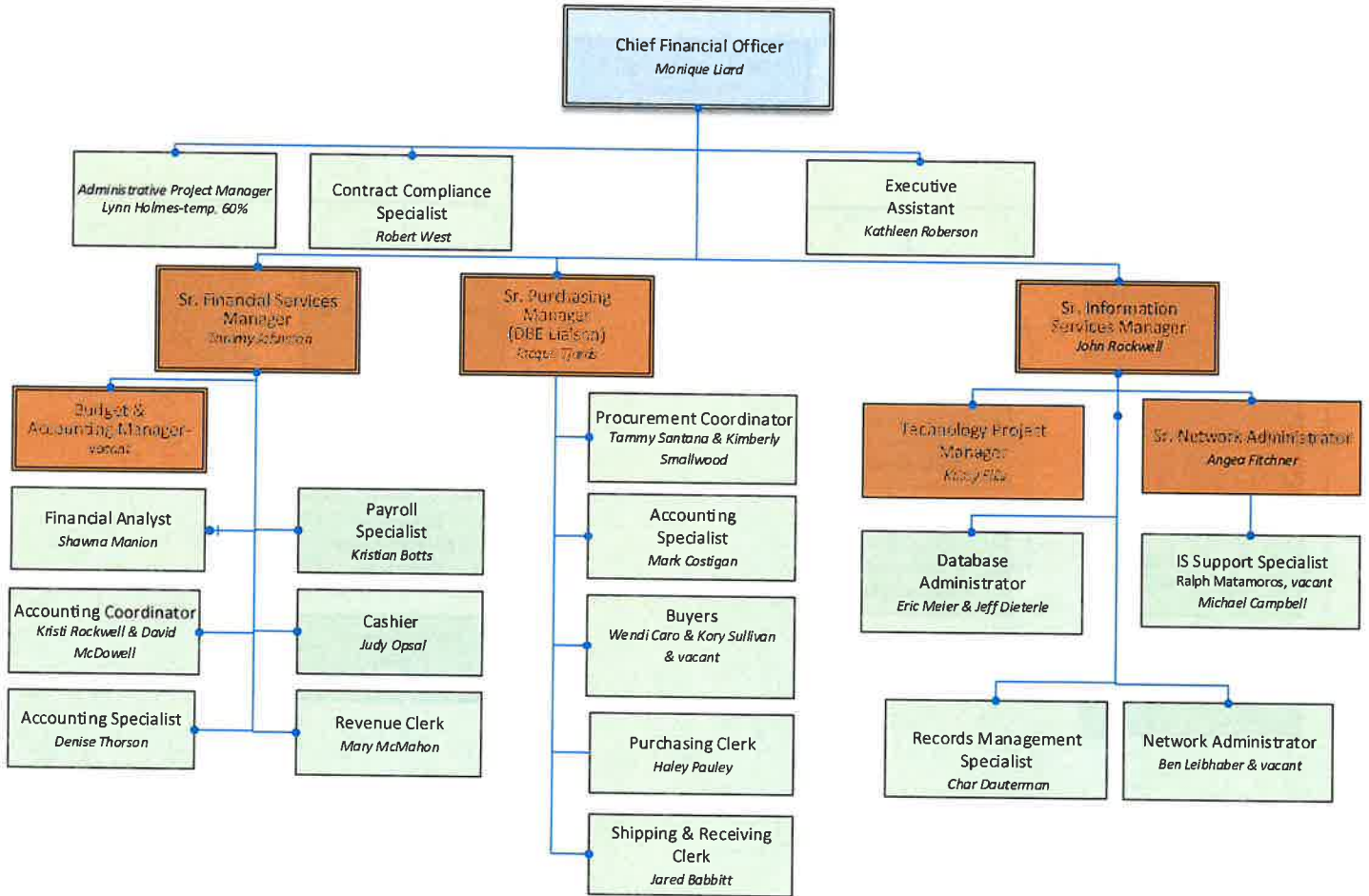
Appendix E-2020 Spokane Transit Organization Chart



## Appendix E-2020 Spokane Transit Organization Chart

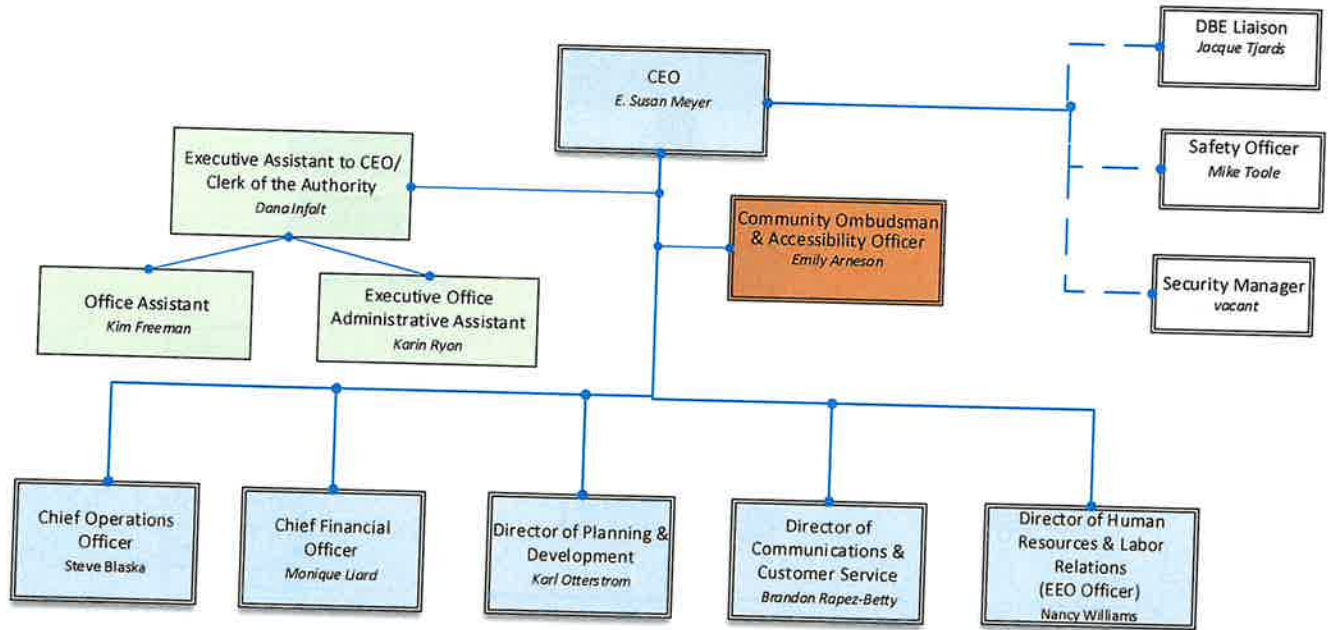


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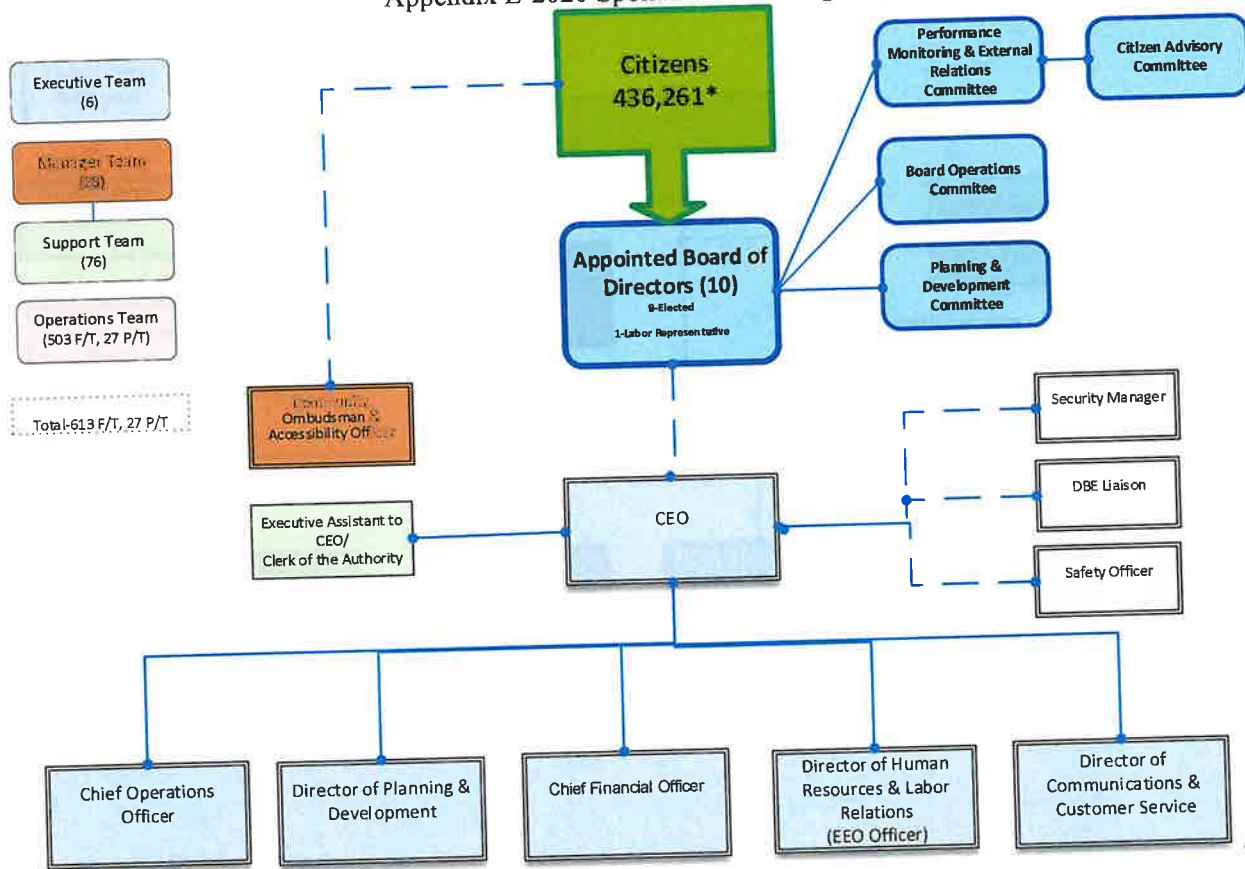




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\*Source: OFM, 2019

## Appendix F

### Previous Plan Year Goals and Timetables

STA compared the current level of minority and female employment, as set forth in the job group analysis, with the availability of minorities and females, as estimated through the factors described in previous sections. As a result of this comparison, both short and long-term goals were established where minorities and females indicated underutilization in certain EEO job categories. These goals are not quotas, but objectives to be pursued by mobilization of available resources for a "good faith effort." Though some numbers were high in regard to underutilization at STA, these numbers do not reflect the actual vacancies at STA.

STA will utilize its EEO Program goals to guide managers as to the desired levels of hiring of persons in the underutilized job category. To be as aggressive as possible in setting goals, making progress and achieving the above objectives, the annual or short-term hiring goal in any group will be equal to availability and only the "Whole Person Rule" has been applied. Whole-Person Rule is an analysis that determines underutilization. Underutilization is declared if the number of females/minorities in a job group is as much or more than one person below the number that would cause the job group participation percentage to match exactly the availability percentage.

In pursuing its EEO Program goals, STA will apply the following principles: First, quotas are expressly forbidden. Second, in all employment decisions, selections are to be made in a non-discriminatory manner. Placement goals do not provide a justification to extend preference to an individual on the basis of that person's race, color, religion, gender, national origin or other protected characteristic. Third, placement goals may not be used to supersede merit selection principles. Placement goals do not require hiring a person who lacks qualifications to perform the job successfully or hiring a less qualified person in preference to a more qualified person. Fourth, STA's efforts are to identify goals that are significant, measurable, and attainable with specific timetables for planned results. Fifth, goals will be set with attention to anticipated attrition, expansion, contraction, turnover in the work force, and availability of persons with required skills. Sixth, changes to existing employment practices which may contribute to the underutilization in increasing availability of minorities and women will be considered. Seventh, no goal will be rigid or inflexible, and will be reasonably attainable targets through the agency's good faith efforts to make its EEO Program succeed.

Appendix A of the 2020 Equal Employment Opportunity Plan represents the ultimate goals and the number of positions needed to reach parity for those job categories that have been identified as underutilized as a result of the utilization analyses. Planned percent increase for the following four years represents the STA's goals of hiring to address the underutilization identified.

## Appendix F

### FEMALES

Job Category Use EEO-4	Female						
	W	A/AN	B	H/L	A	NHOPI	Multi
<b>3 - Technicians</b>							
Current Workforce	5	-	-	-	-	-	1
Percent in Category	10.9%	0.0%	0.0%	0.0%	0.0%	0.0%	2.2%
Percent of Availability	47.4%	0.1%	1.7%	2.2%	1.2%	0.2%	0.6%
Percent Underutilized	37%			2%			
Underutilized (Yes/No)	Yes	No	No	Yes	No	No	No
Number Needed to Reach Parity	16	-	-	1	-	-	-
Planned percent increase Year 1	5%			0%			
Planned percent increase Year 2	5%			1%			
Planned percent increase Year 3	5%			0%			
Planned percent increase Year 4	5%			1%			
<b>4 - Protective Service</b>							
Current Workforce	1	-	-	-	-	-	-
Percent in Category	8.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Percent of Availability	20.8%	0.5%	0.2%	0.2%	0.0%	0.0%	0.5%
Percent Underutilized	12%						
Underutilized (Yes/No)	Yes	No	No	No	No	No	No
Number Needed to Reach Parity	1	-	-	-	-	-	-
Planned percent increase Year 1	3%						
Planned percent increase Year 2	3%						
Planned percent increase Year 3	3%						
Planned percent increase Year 4	3%						

Job Category Use EEO-4	Female						
	W	A/AN	B	H/L	A	NHOPI	Multi
<b>7 - Skilled Craft</b>							
Current Workforce	1	-	-	1	1	-	-
Percent in Category	2.0%	0.0%	0.0%	2.0%	2.0%	0.0%	0.0%
Percent of Availability	6.4%	0.0%	0.1%	0.6%	0.3%	0.0%	0.2%
Percent Underutilized	4%						
Underutilized (Yes/No)	Yes	No	No	No	No	No	No
Number Needed to Reach Parity	2	-	-	-	-	-	-
Planned percent increase Year 1	1%						
Planned percent increase Year 2	1%						
Planned percent increase Year 3	1%						
Planned percent increase Year 4	1%						
<b>8 - Service-Maintenance</b>							
Current Workforce	86	1	1	2	1	-	2
Percent in Category	22.1%	0.3%	0.3%	0.5%	0.3%	0.0%	0.5%
Percent of Availability	37.3%	0.7%	0.7%	2.5%	1.6%	0.2%	1.3%
Percent Underutilized	15%	0%	0%	2%	1%		1%
Underutilized (Yes/No)	Yes	Yes	Yes	Yes	Yes	No	Yes
Number Needed to Reach Parity	59	1	1	7	5	-	3
Planned percent increase Year 1	3%	1%	1%	1%	1%		1%
Planned percent increase Year 2	3%	0%	0%	0%	0%		0%
Planned percent increase Year 3	3%	0%	0%	1%	0%		0%
Planned percent increase Year 4	3%	0%	0%	0%	0%		0%



## Appendix F

### MALES

Job Category Use EEO-4	Male						
	W	A/AN	B	H/L	A	NHOPI	Multi
8 - Service-Maintenance							
Current Workforce	256	3	14	15	3	4	1
Percent in Category	65.8%	0.8%	3.6%	3.9%	0.8%	1.0%	0.3%
Percent of Availability	4			4.3%	1.6%	0.1%	1.3%
Percent Underutilized				0%	1%		1%
Underutilized (Yes/No)				Yes	Yes	No	Yes
Number Needed to Reach Parity				1	3	-	4
Planned percent increase Year 1				0%	1%		1%
Planned percent increase Year 2				1%	0%		0%
Planned percent increase Year 3				0%	0%		0%
Planned percent increase Year 4				0%	0%		0%

**Availability percentage**  
Using census data, enter percent of male employees available for this racial category. (See instructions.)

### Female Placement Goals

Underutilization was identified in three job categories for women in general and minority women. The biggest challenge in meeting the STA's female goals was and continues to be finding women who have experience and interest in the transportation industry. In order to address this disparity and reach the desired level of diversity, STA will continue its outreach efforts to women's organizations. Over the plan period, STA has undertaken a number of internal and external recruitment and outreach activities to attract and promote women and minorities, including active outreach to AARP, Community Colleges of Spokane, West Central Community Center, The Arc, YMCA, Division of Vocational Rehabilitation, Goodwill, NAACP, N.A.T.I.V.E. Project, Skills'Kin, Highland Park Methodist Church, Senior Times, Gonzaga University, Career Transitions, Spokane Tribe, Career Path Services, Whitworth, Easter Seals, YWCA, Korean Presbyterian Church, The Black Lense, EWU, United Way, Martin Luther King Jr. Family Center, Dept. of Veteran Affairs, Spokane Library, and WorkSource. In every area above, STA has made good-faith efforts to meet its placement goals and will continue to do so for the next goal period.

