



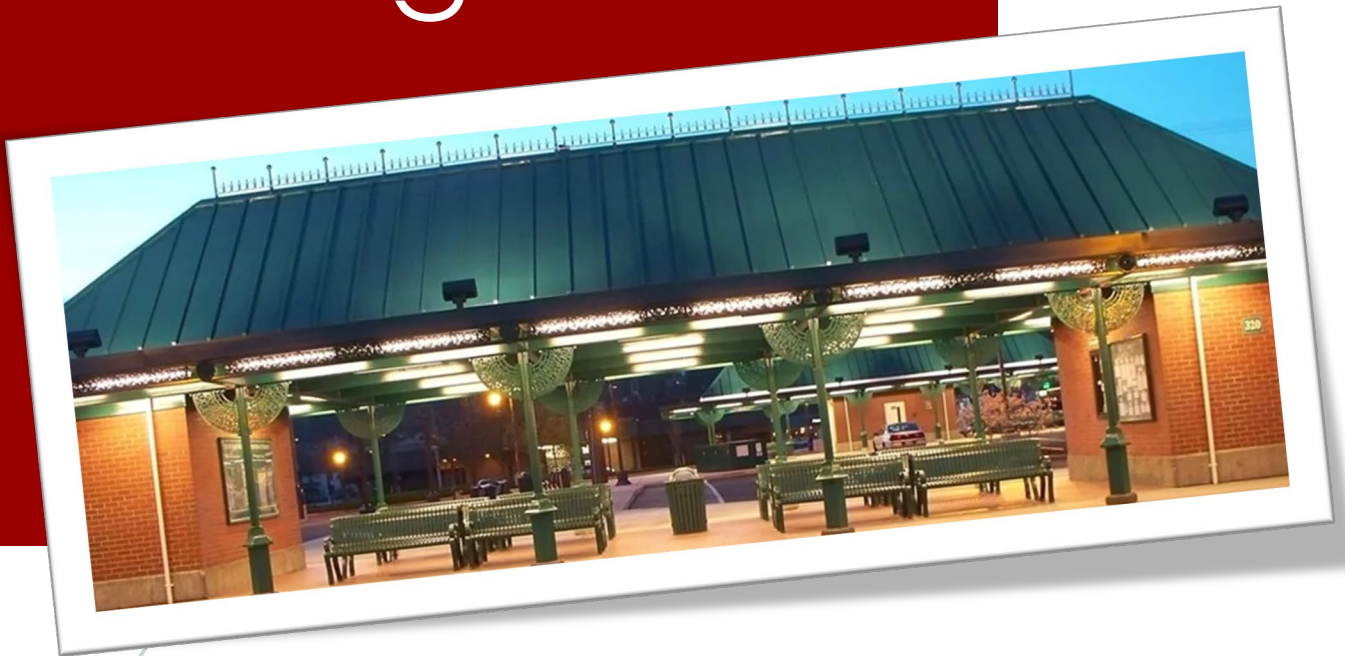
Grays Harbor Transportation Authority

705 30th Street

Hoquiam, WA 98550

www.ghtransit.com

EEO Program



Program Dates:

July 1, 2023 - June 30, 2027

EEO Officer:

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1 EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT

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

GHT Equal Employment Opportunity (EEO) policy applies to all employment actions, including but not limited to, recruitment, hiring, selection for training, promotion, transfer, demotion, layoff, termination, rates of pay or other forms of compensation.

All applicants and employees have the right to file complaints alleging discrimination. Retaliation against an individual who files a charge or complaint of discrimination, participates in an employment discrimination proceeding (such as an investigation or lawsuit), or otherwise engages in protected activity is strictly prohibited and will not be tolerated.

GHT 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.

GHT's General Manager maintains overall responsibility and accountability for GHT's compliance with its EEO Policy and Program. To ensure day-to-day management, including program preparation, monitoring, and complaint investigation, GHT has appointed the Human Resources Supervisor as GHT's EEO Officer. The EEO Officer will report directly to the General Manager and acts with authority with all levels of management, labor unions, and employees.

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

GHT 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 Program 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 Policy and Program.

Ken Mehlin 7/26/23
Signature Date
Ken Mehlin, General Manager

2 PROGRAM ADMINISTRATION

A. Personnel Responsibilities

The General Manager bears the overall responsibility for the implementation of GHT's EEO Program. The Human Resources Supervisor, under delegation from the General Manager, is responsible for coordinating, maintaining and evaluating the implementation of the Program. GHT does not consider this a conflict of interest for the Human Resources Supervisor to serve as the EEO Officer. The size of the agency does not experience sufficient EEO adverse activities to support a single position to administer the EEO Program. Additionally, other staff handle day-to-day personnel actions with input provided by the Human Resources Supervisor to ensure no adverse action occurs. Department Managers are charged with responsibility for carrying out the EEO Program within their departments and for reporting with respect to implementation of the Program to the EEO Officer. Supervisors are responsible for carrying out the goals and objectives of the Program as delegated to them by their department managers.

B. EEO Officer

The EEO Officer is responsible for:

1. Developing the GHT EEO Program, through a policy statement and a written EEO program.
2. Periodically reviewing, in conjunction with human resources, all employment practice policies, complaint policies, reasonable accommodation policies, performance evaluations, grievance procedures, and union agreements.
3. Auditing postings of the GHT EEO Policy (statement) to ensure compliance information is posted and current.
4. Reviewing GHT non-discrimination objectives and goals with all managers and supervisors to ensure that EEO objectives are understood.
5. Assisting management in collecting and analyzing employment data, identifying problem areas, setting goals and timetables, and developing programs to achieve goals.
6. Reviewing and concurring with proposed candidate lists, temporary placements, and personnel requisition forms for all promotions, new hires and union referrals for diverse applicant and candidate pools and compliance with EEO goals and objectives.
7. Assisting human resources with notifying employees and applicants of available training programs and professional development opportunities and the entrance requirements for such opportunities.
8. Facilitating mandatory EEO training such as discrimination and harassment prevention and retaliation sessions for management, supervisors, and employees.
9. Informing the general manager and department managers at least semiannually about each department's progress toward achieving the EEO program goals and on contractor and vendor compliance.

10. Serving as liaison between GHT, federal, state, county, and local governments, in addition to minority, women, and disability organizations, regulatory agencies, and other community groups.
11. Investigating or overseeing the investigation of complaints of EEO discrimination.
12. Designing, implementing, and monitoring internal audit and reporting systems to measure program effectiveness, and to determine where progress has been made and where further action is needed.
13. Maintaining awareness of current EEO laws and ensuring that current legal information affecting nondiscrimination is disseminated to responsible officials.
14. Conducting a formal review of the Program annually and discuss with department managers to ensure successful implementation of the Program.

C. Departmental Plans

In support of the GHT Equal Employment Opportunity Policy Program, each department shall, depending on their needs, develop goals and objectives related to their work environment, which will contribute toward the overall goals and objectives established in the Program. Departments are responsible for:

1. To assist in the identification of problem areas and to establish department goals and objectives which will further the organization's commitment to equal employment opportunity.
2. Assisting the EEO Officer with maintaining and updating the personnel database for generating reports required for the nondiscrimination program.
3. Holding regular discussions with other managers, supervisors, employees, and affinity groups to ensure the organization's policies and procedures are being followed.
4. Reviewing the qualifications of department employees and applicants for employment to ensure and encourage participation in professional development and career growth opportunities to support the advancement of the Program.
5. Participating in periodic audits of all aspects of employment to identify and remove barriers in achieving specified goals and objectives.
6. Participating in the review and/or investigation of complaints alleging discrimination.

3 DISSEMINATION

This section describes the formal communication methods that GHT has established to publicize and disseminate the organization's Program. GHT is committed to familiarizing its entire workforce with the Program. All necessary steps will be taken to ensure that personnel, management, supervisors, and other appropriate individuals are fully apprised of the Program and its existence. Methods to be used for information dissemination shall include:

A. Internal Communication

1. The general manager/designee will disseminate the GHT Equal Employment Opportunity Policy as well as other important aspects of the Program to all employees and stakeholders.
2. Meetings with all employees and affinity groups will be held to gain input on the Program's implementation. Meetings and agendas, including attendance documentation, will be maintained.
3. The GHT Equal Employment Opportunity Policy will be included or referred to into GHT's policies, employee handbooks, reports and rules and regulations manuals.
4. Official EEO materials, including federal and state labor laws and the GHT Equal Employment Opportunity Policy, will be posted in appropriate work locations such as bulletin boards, near time clocks, in employee break rooms, and in the Operations, Maintenance and Administration offices.
5. Periodic EEO training will be conducted for all employees and managers. All training will be documented.
6. When new supervisors or managers are appointed, they will receive EEO training within 90 days of such appointment. All training will be documented.
7. A meeting between top management officials within various GHT departments and the EEO Officer will take place semiannually to discuss the Program and its implementation. Meetings and agendas, including attendance documentation, will be maintained.

B. External Communication

1. Community organizations will be informed about the Program, and the EEO Officer will maintain liaison with organizations serving persons of minority status and females.
2. Recruitment sources, such as the appropriate media, employment agencies, educational institutions and jurisdictions that receive GHT's employment announcements will be regularly reminded of the EEO policy and GHT will disseminate the policy to such entities.
3. All job position announcements in newspapers, websites and social media will include the following statement "Equal Employment Opportunity Employer."

4 EMPLOYMENT PRACTICES

A. General

All GHT employment practices, except when a bona fide occupational qualification exists, are applied equally to employees and applicants and without regard to race, color, religion, national origin, sex (including gender identity, sexual orientation, and pregnancy), age, genetic information, disability, veteran status, or other protected class, and in accordance with the current collective bargaining agreement provisions and the GHT Employee Manual and policies. The Human Resources Supervisor has overall responsibility for the application of GHT's employment practices and addressing barriers to equal opportunity that are identified through the monitoring and reporting procedures.

B. Collective Bargaining

1. Equal Opportunity: GHT and the labor union representing bargaining unit employees are committed to ensuring equal employment opportunities in accordance with local, state, and federal laws for all employees and applicants. The provisions of the collective bargaining agreement concerning hiring and placement, conditions and privileges of employment, compensation, training, promotions, transfers, discipline, benefits, and other related programs, are administered on the basis of merit to all represented employees in the bargaining unit, and without regard to an employee's race, creed, color, religion, sex, sexual orientation, gender expression, gender identity, gender information, national origin, political affiliation, union membership or non-membership, age, marital status, disability, or liability for service in the Armed Forces of the United States. GHT and the labor union agree that GHT will recruit, select, and promote employees and/or hire external candidates on the basis of their relative knowledge, skills, and abilities, and in accordance with GHT's equal employment opportunity program and policies.

2. Barriers: GHT will not evade any equal employment opportunity responsibilities on the basis of collective bargaining agreement provisions. GHT will renegotiate any collective bargaining agreement language that is identified as barrier to equal employment for represented employees.

3. Seniority: Seniority is established when an employee enters probationary status and is applied to working conditions (assignments of work, including overtime, and time off excluding protected leaves), wages, and benefits. Seniority is used for the assignment of work, including overtime, awarding periods of paid time off (excluding protected leave types). Wages also increase with an employee's seniority date, until the maximum wage of the scale is reached.

C. Nepotism

To avoid the appearance or actual conflict, no applicant of GHT or employee who is a relative, household member, or in a relationship with an employee, will be assigned to audit the work of the other, hired, assigned/transferred, or appointed to a lead or supervisory position or role over the other. GHT will review the GHT Nepotism Policy to ensure compliance prior to assigning, transferring, or promoting employees.

D. Job Descriptions

1. **General:** Job descriptions define the type of work, including essential functions, minimum qualifications, physical demands, and working conditions of each position. The essential functions within the job description are the fundamental and key job duties performed, and do not include marginal functions, which are extra or incidental duties. A function may be essential whereas:
 - The position exists to perform that function.
 - There are a limited number of employees available who could perform that function.
 - The function is highly specialized, and the person in the position is hired for special expertise or ability to perform it.
2. **Review:** Job descriptions are reviewed to ensure that major job functions are reflected and that there are not qualifications required that are higher than needed. Reviews are conducted prior to any recruitment and periodically as needed.

E. Recruitments

1. **General:** Recruitment strategies are intended to target the most qualified applicants, while supporting the goals and timetables of the Program. Recruitment announcements will identify the type of recruitment (internal or external), the duration of the recruitment period, the wage/salary range and benefits, how to obtain application documents, including the complete position description, and how to apply, along with an overview of the selection process. All recruitment announcements will include the statement, "GHT is an equal employment opportunity employer."
2. **Applicant Pools:** Internal recruitment is open to GHT employees only, subject to limitations of the collective bargaining agreement. External recruitments are open to the public and all GHT employees, regardless of employment status. Depending on the position and its inclusion in the bargaining unit, the Human Resources Supervisor will determine the type of applicant pool needed to best fill the position(s).
3. **Outreach:** Internal recruitments will be posted in the designated work locations that are accessible to all employees and sent via internal email to all employees. All external recruitments will be posted on the GHT website and will be advertised on the local radio, and relative career websites and social media. Additionally, the recruitment will be sent to minority, female and disabled persons groups.
4. **Self-Identification:** All internal and external applicants are provided self-identification forms to voluntarily complete that are separate from other application documents. The form explains its purpose and the privacy of any information provided. All completed forms are reviewed by Human Resources personnel only for data collection purposes and are maintained in a secure location, separate from the recruitment and employee files. Access to these forms is limited to Human Resources personnel.

F. Selection Procedure

1. **General:** The selection process is designed to screen applicants through the use of objective measures. Applicants will be offered equal opportunity to compete for consideration and selection without regard to race, color, religion, national origin, sex, sexual orientation, gender, gender identity, pregnancy, genetic information, age, veteran status, disability, or other protected class. The Human Resources Department personnel are responsible for administering the screening tools and assessing applicant qualifications. Each step in the selection process will be designed to test only the knowledge and skills required to perform the work in a specific position.
2. **Safety-Sensitive Positions:** Positions designated as safety sensitive, are also subject to the drug and alcohol testing requirements, in accordance with the GHT Drug and Alcohol Policy. Applicants must also release prior drug and alcohol employment information as required by 49 CFR Part 40 Drug and Alcohol Testing, to be considered for employment.
3. **Applicant Evaluation:** Applicants must apply by the posted deadline and meet the published minimum qualifications to be considered for the position.
4. **Examinations:** Tests may be used to identify applicants' ability to demonstrate the required skills and aptitude needed for the position. Testing methods may include written experience, willingness, skills supplemental questionnaires, and in-person assessments. The weights assigned to these tests are generally pass/fail, meaning if the applicant provides the necessary information and confirms their willingness to perform the work as explained, they are moved to the next step in the selection process. Question cut-offs are generally limited to the applicant declining to perform or comply with certain working conditions. Testing that is provided by a third-party administrator is used to further assess an applicant's qualifications. The scoring and weight used is based upon the TPA's recommended thresholds. TPAs used for the selection process have confirmed the validation of their tests.
5. **Interviews:** One or more interviews will be conducted with applicants who successfully complete the required selection examinations. The interview panel will be diverse to the extent possible within the available workforce. All interview panel members will be trained in interviewing techniques and the legal limitations to ensure interviews are conducted equitably and lawfully prior to participating in any interviews. Interview questions will be reviewed for position-relevance and legality prior to the interview.
6. **Criminal Records:** Criminal records will be used to the extent allowed under state and federal regulations. All applicants will be afforded the opportunity to review the records obtained and respond prior to any employment decision being made.
7. **Applicant Verification:** Current and/or prior employment information may be used as part of the selection process. Verification of any required licenses, certifications, work history, academic records, or other records that may be required to fulfill the duties of the position may be used in the selection process. Applicants will provide a written authorization that allows GHT to verify the applicant's information.
8. **Medical/Physical Assessments:** Medical and/or physical assessments may be used to determine fitness for duty for the position for the purposes of determining the applicant's ability to perform the essential functions of the position. Assessments will only be conducted after an offer of employment is extended to the applicant.
9. **EEO Officer Review:** The EEO Officer will review the recruitment and selection process, and recommended applicant information prior to the appointment being presented to

the GHT General Manager for approval. The EEO Officer will recommend the hire, if upon review of the employment documents, has determined that the actions of GHT are not discriminatory or result in disparate treatment of any candidate. If any discriminatory or disparate treatment is discovered, the appointment will be held in abeyance, and the EEO Officer will refer to the Complaint Procedure in this Program for further action.

G. Training Opportunities

1. **General:** GHT is committed to training its workforce. All employees, including minorities and women, are afforded equal opportunity to participate in formal and informal training, subject to the specific training purpose and training options available.
2. **Promotional:** Promotional training opportunities will be announced through an internal recruitment to all employees, including minorities and women. The selection of the candidate(s) will be based on the qualifications, experience, and training as it relates to the requirements of the advancement. All promotional training opportunities will be documented for reporting purposes.

- H. Transfer and Promotion Practices:** GHT's transfer and promotion practices are periodically monitored to ensure that lateral and vertical movement occurs without regard to race, color, national origin, religion, age, sex, pregnancy, or disability and with proper regard for their privacy and constitutional rights.

I. Compensation and Benefit Programs

1. **General:** The purpose of GHT's compensation and benefit programs is to enable GHT to attract, retain and motivate highly qualified employees and to provide salaries and benefits commensurate with GHT's financial goals and constraints, and with comparable and competing organizations. The compensation and benefit programs are administered and available to all eligible employees without regard to race, color, religion, national origin, sex (including gender identity, sexual orientation, and pregnancy), age, genetic information, disability, veteran status, or other protected class.
2. **Review:** The compensation and benefit programs are periodically reviewed to ensure equal treatment is provided to all employees. Seniority determines some benefit values for all employees. Retirement benefits and paid general leave increase with years of continuous service. The collective bargaining agreement and GHT policies further define benefits as well as working conditions.

J. Reasonable Accommodations

1. **General:** GHT is committed to offering equal access to employment opportunities for persons with disabilities in accordance with the Americans with Disabilities Act (hereinafter "ADA") of 1990, the Americans with Disabilities Act Amendments Act (hereinafter "ADAAA") of 2008, and the regulations and guidance issued by the Equal Employment Opportunity Commission (hereinafter "EEOC") and the Washington State Human Rights Commission (hereinafter "HRC").
2. **Provisions:** GHT will provide reasonable accommodation to applicants and employees who are qualified for a job, with or without reasonable accommodation, to enable the performance of the essential functions of the job. Reasonable accommodations will be made when available, unless doing so causes a direct threat to these individuals or others in the workplace and the threat cannot be eliminated by reasonable accommodation or if the accommodation creates an undue hardship to GHT. GHT will not discriminate against qualified applicants or employees making reasonable

accommodations requests. The need for a reasonable accommodation will not negatively impact the consideration of a qualified individual with a disability.

K. Discipline

1. Represented Employees: Discipline refers to written reprimands, suspension, demotion, or discharge from employment. Represented employees will only be disciplined for just cause, as defined in the CBA and GHT Discipline Policy. Employees will receive their due process prior to any discipline being imposed. Discipline will be carried out without regard to race, color, religion, national origin, sex (including gender identity, sexual orientation, and pregnancy), age, genetic information, disability, veteran status, or other protected class.

2. Non-represented Employees: Discipline refers to a written reprimand, suspension, demotion, or discharge from employment. Non-represented employees are at-will employees and if subject to discipline, it will be imposed in accordance with the GHT Discipline Policy. Discipline will be imposed without regard to any protected class or status.

L. Layoffs

1. Represented Employees: If a reduction-in-force is necessary, seniority will be used to identify the employees in affected positions in accordance with the collective bargaining agreement. Layoffs will be imposed without regard to race, color, religion, national origin, sex (including gender identity, sexual orientation, and pregnancy), age, genetic information, disability, veteran status, or other protected class.

2. Non-represented Employees: If a reduction-in-force is necessary, seniority may be a factor considered when identifying employees in affected positions, in accordance with GHT's layoff provision. Layoffs will be imposed without regard to any protected class or status.

5 COMPLAINT PROCEDURE

A. Investigation

Complaints received from employees or applicants regarding GHT's employment practices will be addressed according to this procedure. The EEO Officer or their qualified designee, will be assigned to investigate any complaint, provided there is not a conflict of interest, or the appearance of any conflict. Any investigator assigned to an EEO complaint will have received EEO investigative training and be otherwise qualified to conduct the investigation.

B. Conflicts of Interest

Independence and impartiality are key factors of a strong and effective equal employment opportunity program. GHT will ensure that no conflicts of position or conflicts of interest, or the appearance of, with respect to the EEO Officer's role. Therefore, in the event a complaint arises involving the EEO Officer or a member of the Human Resources Department, the EEO Officer/qualified designee will recuse themselves from the investigation and the GHT General Manager will obtain a third-party external investigator to conduct an impartial and objective investigation. If GHT's attorney provides legal expertise to the EEO Officer in the investigation of a case cannot be the same attorney who represents the agency in an EEO complaint arising from the same case.

C. Resolution

Provided there is no conflict of interest, upon completion of the investigation, the General Manager and the Human Resources Supervisor will evaluate the investigation outcome to determine what if, any action, is to occur. The individual who filed the complaint will be debriefed individually on the outcome of the investigation.

D. Alternatives

Employees and applicants may instead pursue their EEO complaint with the Washington State Human Rights Commission ("HRC"), or the Equal Employment Opportunity Commission ("EEOC"). Employees may also file a grievance process as outlined in the collective bargaining agreement. However, if an employee or applicant chooses to file a complaint with an external agency, the grievance/complaint filed under this Program will be held in abeyance until the external agency investigation is complete and a determination is made.

E. Tracking

GHT will track complaints to identify any trends or other data that may suggest a barrier in GHT's employment practices. Tracking will also ensure that complaints are processed in a timely manner, and an appropriate resolution, including any disciplinary action imposed, is reached at the conclusion of the investigation. GHT will maintain a log that documents the name of the complainant, basis of the complaint(s), the protected group, date of initial contact, date of resolution, the resolution reached, and the name of the investigator.

6 UTILIZATION ANALYSIS

A. Overview

The EEO Officer uses the availability and utilization analyses to maintain an awareness of utilization and concentration of females and minorities in relation to their availability in the relevant labor markets. GHT recognizes that full utilization of an EEO program, and all available resources within the business community, which includes, but is not limited to, vendors, committee outreach providers and regulatory agencies, is a full complement and benefit to the GHT's existing Program. The availability and utilization analyses also provide a framework for goals and timetables and other affirmative actions to correct employment practices that may have contributed to any identified absence, underutilization, and/or concentration of females or minorities.

B. Workforce Analysis

I. Subcategories

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

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

C. EEO Job Categories

The Equal Employment Opportunity Commission ("EEOC") defines the eight occupational categories as follows, and based upon these definitions, GHT has categorized its active positions as detailed in Exhibit C: Position Categories.

1. **Officials and Administrators:** Occupations in which employees set broad policies, exercise overall responsibility for execution of these policies, or direct individual departments or special phases of the agency's operations, or provide specialized consultation on a regional, district, or area basis. Includes: department heads, bureau chiefs, division chiefs, directors, deputy directors, controllers, wardens, superintendents, sheriffs, police and fire chiefs and inspectors, examiners (bank, hearing, motor vehicle, warehouse), inspectors (construction, building, safety, rent-and- housing, fire, A.B.C. Board, license, dairy, livestock, transportation), assessors, tax appraisers and investigators, coroners, farm managers, and kindred workers.
2. **Professionals:** Occupations which require specialized and theoretical knowledge, which is usually acquired through college training or through work experience and other training providing comparable knowledge. Includes: personnel and labor relations workers, social workers, doctors, psychologists, registered nurses, economists, dietitians, lawyers, systems analysts, accountants, engineers, employment and vocational rehabilitation counselors, teachers or instructors, police and fire captains and lieutenants, librarians, management analysts, airplane pilots and navigators, surveyors and mapping scientists, and kindred workers.
3. **Technicians:** Occupations which require a combination of basic scientific or technical knowledge and manual skill which can be obtained through specialized post-secondary education or through equivalent on-the-job training. Includes: computer programmers, drafters, survey and mapping technicians, licensed practical nurses, photographers, radio operators, technical illustrators, highway technicians, technicians (medical, dental, electronic, physical sciences), police and fire sergeants, inspectors (production or processing inspectors, testers, and weighers), and kindred workers.
4. **Protective Service:** Occupations in which workers are entrusted with public safety, security, and protection from destructive forces. Includes: police patrol officers, firefighters, guards, deputy sheriffs, bailiffs, correctional officers, detectives, marshals, harbor patrol officers, game and fish wardens, park rangers (except maintenance), and kindred workers.
5. **Paraprofessionals:** Occupations in which workers perform some of the duties of a professional or technician in a supportive role, which usually require less formal training and/or experience normally required for professional or technical status. Such positions may fall within an identified pattern of staff development and promotion under a "new careers" concept. Included: research assistants, medical aides, child support workers, policy auxiliary welfare service aides, recreation assistants, homemakers' aides, home health aides, library assistants and clerks, ambulance drivers and attendants, and kindred workers.
6. **Administrative Support (including clerical and sales):** Occupations in which workers are responsible for internal and external communication, recording and retrieval of data and/or information and other paperwork required in an office. Includes: bookkeepers, messengers, clerk-typist, stenographers, court transcribers, hearing reporters, statistical clerks, dispatchers, license distributors, payroll clerks, office machine and computer

operators, telephone operators, legal assistants, sales workers, cashiers, toll collectors, and kindred workers.

7. **Skilled Craft:** Occupations in which workers perform jobs which require special manual skill and a thorough and comprehensive knowledge of the process involved in the work which is acquired through on-the-job training and experience or through apprenticeship or other formal training programs. Includes: mechanics and repairers, electricians, heavy equipment operators, stationary engineers, skilled machining occupations, carpenters, compositors and typesetters, power plant operators, water and sewage treatment plant operators, and kindred workers.
8. **Service-Maintenance:** Occupations in which workers perform duties which result in or contribute to the comfort, convenience, hygiene, or safety of the general public or which contribute to the upkeep and care of buildings, facilities, or grounds of public property. Workers in this group may operate machinery. Includes: chauffeurs, laundry and dry-cleaning operatives, truck drivers, bus drivers, garage laborers, custodial employees, gardeners and groundkeepers, refuse collectors, construction laborers, park rangers (maintenance), farm workers (except managers), craft apprentices/trainees/helpers, and kindred workers.

D. Availability Analysis

GHT recruitment for EEO categories 5 – Paraprofessionals, 6 – Administrative Support, 7 – Skilled Craft, and 8 – Service/Maintenance is reasonably focused in Grays Harbor County. Recruitment for EEO Categories 1 – Officials and Administrators, 2 – Professionals may require focus outside of the Grays Harbor County area, but within Washington State and at times recruitment taking place nationwide.

E. Utilization Analysis Charts

Workforce Analysis (Exhibit C): The work force analysis includes data on workforce demographics by each department job category and sex and race. This data was analyzed to identify any adverse effects on minorities and women through GHT's employment processes.

Section 2.2.6 of the FTA Circular 4704.1A discerns that "FTA does not require analysis for any groups constituting less than 2 percent of the applicable workforce." The categories identified in the utilization analysis with the potential for adverse impacts were reviewed to determine if there were any adverse impacts to minorities, women or other protected classes. Additionally, GHT's employment practices (Exhibit D) were reviewed to assess any barriers or trends in the data that would indicate unintentional impacts. The analysis of available data could not determine any adverse impact, intentional or not, on the employment practices of GHT.

- F. GHT Goals and Timetables for July 1, 2023 to June 30, 2027:** the following goals and timetables are established based on the utilization analysis chart and anticipated vacancies due to attrition and organizational changes that increase overall headcount. The goals and timetables will address the underutilization of identified subcategories in the listed job categories.

- **EEO Category 8 – Service/Maintenance** – Increase appointment of American Indian/Alaska Native (not Hispanic or Latino) males by 1% each year and increase appointment of Hispanic or Latino males by 2% each year.

G. Prior Program Goals and Timetables:

- **Short-term Goals** - GHT Short-term goals did not specify a hiring metric, instead projected an expansion of limited service with an opportunity to correct underutilization with affording employment preference to women and minorities.
- **Long-term Goals** - GHT Long-term goals did not specify a hiring metric, instead anticipated an expansion of fixed route service, which would result in an increase in most job categories.
- **Analysis:** GHT met and exceeded both long-term and short-term goals. The COVID-19 pandemic impeded service expansion in 2020 and 2021, however as the effects of the pandemic stabilized, GHT experienced an unprecedented growth in headcount and hiring. This resulted in an aggressive recruiting campaign and internal growth in all job categories, including affording opportunities to women and minorities.

7 SUBRECIPIENTS AND CONTRACTORS

GHT will maintain a list of subrecipients and proof of their review of the EEO Program. GHT does not currently have any subrecipients.

8 APPENDICES

Appendix A: Organizational Chart

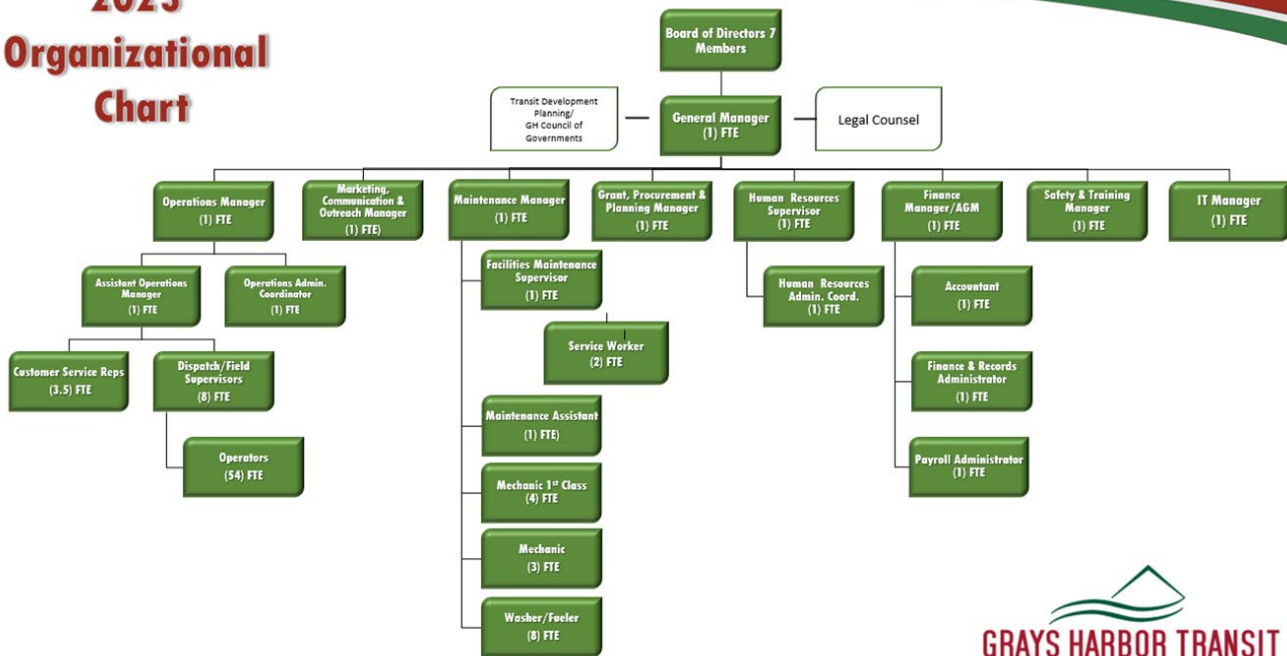
Appendix B: Job Position Categories

Appendix C: Utilization Analysis

Appendix D: Employment Practices

Appendix A: Organizational Chart

2023 Organizational Chart



Appendix B: Job Position Categories

Category 1: Officials and Administrators	
Finance Manager/Assistant General Manager	Maintenance Manager
General Manager	Operations Manager
Category 2: Professionals	
Accountant	IT Manager
Grant Procurement & Planning Manager	Safety & Training Manager
Category 3: Technicians	
N/A	
Category 4: Protective Services	
N/A	
Category 5: Paraprofessionals	
Assistant Operations Manager	Marketing, Communications & Outreach Manager
Human Resources Supervisor	Operations Admin. Coordinator
Human Resources Administrative Coordinator	Payroll Administrator
Facilities Maintenance Supervisor	
Category 6: Administrative Support	
Dispatch/Supervisor	Maintenance Assistant
Finance and Records Administrator	
Category 7: Skilled Craft	
Lead Mechanic	Mechanic 1 st Class
Mechanic	
Category 8: Service-Maintenance	
Customer Service Representative	Service Worker
Operator	Washer/Fueler

Appendix C: Utilization Analysis

Job Category Use EEO-4	Salary Range (\$XX,000-XX,000)	Total Workforce				Male				Female			
		All	WM	MM	WF	W	A/AN	B	H/L	A	H/L	A	Multi
1 - Officials & Administrators													
Current Workforce	74000 - 160000	4	2	0	2	0							
Percent in Category	*Entry		50.0%		50.0%	50.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Percent of Availability						47.7%	0.4%	0.0%	2.0%	1.6%	0.2%	0.9%	0.0%
Percent Underutilized													3.8%
Underutilized (Yes/No)							No	No	No	No	No	No	No
Number Needed to Reach Parity													
Planned percent increase Year 1													
Planned percent increase Year 2													
Planned percent increase Year 3													
Planned percent increase Year 4													
2 - Professionals													
Current Workforce	55000 - 114000	3	2	0	1	0							
Percent in Category	*Entry		66.7%		33.3%	66.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Percent of Availability						34.6%	1.2%	0.0%	0.8%	1.2%	0.2%	4.5%	1.6%
Percent Underutilized													1.6%
Underutilized (Yes/No)							No	No	No	No	No	No	No
Number Needed to Reach Parity													
Planned percent increase Year 1													
Planned percent increase Year 2													
Planned percent increase Year 3													
Planned percent increase Year 4													
3 - Technicians													
Current Workforce		0	0	0	0	0							
Percent in Category	*Entry					0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Percent of Availability						0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Percent Underutilized													
Underutilized (Yes/No)							No	No	No	No	No	No	No
Number Needed to Reach Parity													
Planned percent increase Year 1													
Planned percent increase Year 2													
Planned percent increase Year 3													
Planned percent increase Year 4													

Appendix C: Utilization Analysis

Job Category Use EEO-4	Salary Range (\$XX,000-XX,000)	Total Workforce						Male				Female								
		All	WM	MM	WF	MF	W	AJAN	B	HIL	A	NHOPI	Multi	W	AJAN	B	HIL	A	NHOPI	Multi
4 - Protective Service		0	0	0	0	0														
Current Workforce	*Entry						0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Percent in Category							0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Percent of Availability							0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Percent Underutilized																				
Underutilized (Yes/No)																				
Number Needed to Reach Parity																				
Planned percent increase Year 1																				
Planned percent increase Year 2																				
Planned percent increase Year 3																				
Planned percent increase Year 4																				
5 - Paraprofessional		6	1	0	4	1	1	-	-	-	-	-	-	4	-	-	-	-	-	1
Current Workforce	\$3000 - 109000		16.7%		66.7%	16.7%	16.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	66.7%	0.0%	0.0%	0.0%	0.0%	0.0%	16.7%
Percent in Category	*Entry						13.4%	1.4%	0.0%	1.8%	0.2%	0.1%	0.5%	70.7%	2.5%	0.0%	5.9%	1.5%	0.1%	2.1%
Percent of Availability														4%						
Percent Underutilized																				
Underutilized (Yes/No)							No	No	No	No	No	No	No	No	No	No	No	No	No	No
Number Needed to Reach Parity																				
Planned percent increase Year 1																				
Planned percent increase Year 2																				
Planned percent increase Year 3																				
Planned percent increase Year 4																				
6 - Administrative Support																				
Current Workforce	\$2000 - 81000	8	1	1	6	0	1	-	-	-	1	-	-	6	-	-	-	-	-	-
Percent in Category	*Entry		12.5%	12.5%	75.0%		12.5%	0.0%	0.0%	0.0%	12.5%	0.0%	0.0%	75.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Percent of Availability							13.4%	1.4%	0.0%	1.8%	0.2%	0.1%	0.5%	70.7%	2.5%	0.0%	5.9%	1.5%	0.1%	2.1%
Percent Underutilized																				
Underutilized (Yes/No)								No	No	No	No	No	No	No	No	No	No	No	No	No
Number Needed to Reach Parity																				
Planned percent increase Year 1																				
Planned percent increase Year 2																				
Planned percent increase Year 3																				
Planned percent increase Year 4																				

Appendix C: Utilization Analysis

Job Category Use EEO-4	Salary Range (\$XX,000-XX,000)	Total Workforce					Male					Female								
		All	WM	MM	WF	MF	W	AI/AN	B	H/L	A	NHOPI	Mult	W	AI/AN	B	H/L	A	NHOPI	Mult
7 - Skilled Craft																				
Current Workforce	55000 - 70000	6	5	1	0	0	5	-	-	1	-	-	-	-	-	-	-	-	-	-
Percent in Category			83.3%	16.7%			83.3%	0.0%	0.0%	16.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Percent of Availability	*Entry						75.3%	4.3%	0.2%	0.0%	0.0%	0.0%	0.0%	4.5%	0.4%	0.0%	0.0%	0.0%	0.0%	0.0%
Percent Underutilized																				
Underutilized (Yes/No)								No	No	No	No	No	No	No	No	No	No	No	No	No
Number Needed to Reach Parity								-	-	-	-	-	-	-	-	-	-	-	-	-
Planned percent increase Year 1																				
Planned percent increase Year 2																				
Planned percent increase Year 3																				
Planned percent increase Year 4																				
8 - Service-Maintenance																				
Current Workforce	38000 - 58000	66	44	5	13	4	44	-	-	2	-	-	1	13	-	2	-	1	-	-
Percent in Category			66.7%	7.5%	19.7%	6.1%	66.7%	0.0%	0.0%	3.0%	0.0%	0.0%	1.5%	19.7%	0.0%	3.0%	1.5%	1.5%	0.0%	0.0%
Percent of Availability	*Entry						73.8%	1.8%	0.0%	9.8%	0.8%	0.2%	1.0%	10.1%	1.0%	0.0%	1.7%	0.0%	0.0%	1.5%
Percent Underutilized								2%		7%							0%			
Underutilized (Yes/No)								Yes	No	Yes	No	No	No	No	No	No	No	No	No	No
Number Needed to Reach Parity								1	-	4	-	-	-	-	-	-	-	-	-	-
Planned percent increase Year 1								1%		2%										
Planned percent increase Year 2								2%		2%										
Planned percent increase Year 3								1%		2%										
Planned percent increase Year 4								1%		2%										

Appendix D: Employment Practices Analysis

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
1 - Officials & Administrators																
Number Applied	18	-	14	-	-	-	1	-	1	-	-	-	-	-	-	-
Total Hires	1	-	1	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	6.3%	N/A	7.1%	N/A	N/A	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	N/A	100.0%	N/A	N/A	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	N/A	No	N/A	N/A	N/A	Yes	N/A	Yes	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2 - Professionals																
Number Applied	11	2	7	1	-	-	1	-	1	1	1	-	-	-	1	-
Total Hires	2	-	2	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	18.2%	0.0%	28.6%	0.0%	N/A	N/A	0.0%	N/A	0.0%	0.0%	0.0%	N/A	N/A	N/A	0.0%	N/A
Ratio to Highest Rate	100.0%	N/A	100.0%	0.0%	N/A	N/A	0.0%	N/A	0.0%	0.0%	0.0%	N/A	N/A	N/A	0.0%	N/A
Potential Adverse Impact (Yes/No)	No	No	No	Yes	N/A	N/A	Yes	N/A	Yes	Yes	Yes	N/A	N/A	N/A	Yes	N/A
3 - Technicians																
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
4 - Protective Service																
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
5 - Paraprofessional																
Number Applied	25	33	19	25	1	-	-	1	-	1	2	2	-	-	3	4
Total Hires	3	2	2	2	-	-	-	-	-	-	-	-	-	-	1	-
Selection Rate	12.0%	6.1%	10.5%	8.0%	N/A	N/A	N/A	N/A	N/A	N/A	0.0%	0.0%	N/A	N/A	33.3%	0.0%
Ratio to Highest Rate	100.0%	50.5%	31.6%	24.0%	N/A	N/A	N/A	N/A	N/A	N/A	0.0%	0.0%	N/A	N/A	100.0%	0.0%
Potential Adverse Impact (Yes/No)	No	Yes	Yes	Yes	N/A	N/A	N/A	N/A	N/A	N/A	Yes	Yes	N/A	N/A	No	Yes
6 - Administrative Support																
Number Applied	7	17	6	17	-	-	-	-	-	-	-	-	-	-	1	-
Total Hires	-	7	-	7	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	0.0%	41.2%	0.0%	41.2%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.0%	N/A
Ratio to Highest Rate	N/A	100.0%	0.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.0%	N/A
Potential Adverse Impact (Yes/No)	No	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
7 - Skilled Craft																
Number Applied	25	1	23	1	1	-	-	-	1	-	-	-	-	-	-	-
Total Hires	8	-	7	-	-	-	-	-	1	-	-	-	-	-	-	-
Selection Rate	32.0%	0.0%	30.4%	0.0%	0.0%	N/A	N/A	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	N/A	30.4%	0.0%	0.0%	N/A	N/A	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	Yes	Yes	Yes	N/A	N/A	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A
8 - Service-Maintenance																
Number Applied	97	35	79	32	1	-	4	1	8	1	1	-	-	-	4	1
Total Hires	26	14	22	13	-	-	-	-	3	-	-	-	-	-	1	1
Selection Rate	26.8%	40.0%	27.8%	40.6%	N/A	N/A	0.0%	N/A	37.5%	N/A	N/A	N/A	N/A	N/A	25.0%	N/A
Ratio to Highest Rate	67.0%	100.0%	68.5%	100.0%	N/A	N/A	0.0%	N/A	92.3%	N/A	N/A	N/A	N/A	N/A	61.5%	N/A

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	No	N/A	N/A	N/A	N/A	N/A	Yes	N/A
Notes: 2 applicants in Paraprofessional did not indicate EEO information, 13 Applicants in Service Maintenance did not indicate EEO information																
Persons with Disabilities																
Number Applied	4	-	3	-	-	-	-	-	1	-	-	-	-	-	-	-
Total Hires	1	-	1	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	25.0%	N/A	33.3%	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Veterans																
Number Applied	12	1	9	1	-	-	-	-	2	-	-	-	-	-	1	-
Total Hires	6	-	5	-	-	-	-	-	1	-	-	-	-	-	-	-
Selection Rate	50.0%	0.0%	55.6%	0.0%	N/A	N/A	N/A	N/A	50.0%	N/A	N/A	N/A	N/A	N/A	0.0%	N/A
Notes: 50 Applicants in all job categories did not indicate disability status, 52 Applicants in all job categories did not indicate veteran status																

Appendix D: Employment Practices Analysis

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
1 - Officials & Administrators																
Number Applied	1	-	1	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Promotions	1	-	1	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	N/A	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
2 - Professionals																
Number Applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Promotions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3 - Technicians																
Number Applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Promotions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
4 - Protective Service																
Number Applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Promotions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
5 - Paraprofessional																
Number Applied	1	3	1	3	-	-	-	-	-	-	-	-	-	-	-	-
Total Promotions	1	3	1	3	-	-	-	-	-	-	-	-	-	-	-	-
Selection 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
Ratio to Highest 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
6 - Administrative Support																
Number Applied	8	4	6	3	-	-	-	-	-	-	1	-	-	-	1	1
Total Promotions	3	4	1	3	-	-	-	-	-	-	1	-	-	-	1	1
Selection Rate	37.5%	100.0%	16.7%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A	N/A	100.0%	100.0%
Ratio to Highest Rate	37.5%	100.0%	16.7%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A	N/A	100.0%	100.0%
Potential Adverse Impact (Yes/No)	Yes	No	Yes	No	N/A	N/A	N/A	N/A	N/A	N/A	No	N/A	N/A	N/A	No	No
7 - Skilled Craft																
Number Applied	5	-	4	-	-	-	-	-	1	-	-	-	-	-	-	-
Total Promotions	4	-	3	-	-	-	-	-	1	-	-	-	-	-	-	-
Selection Rate	80.0%	N/A	75.0%	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	N/A	75.0%	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	N/A	Yes	N/A	N/A	N/A	N/A	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A
8 - Service-Maintenance																
Number Applied	2	2	2	2	-	-	-	-	-	-	-	-	-	-	-	-
Total Promotions	2	2	2	2	-	-	-	-	-	-	-	-	-	-	-	-
Selection 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
Ratio to Highest 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

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)	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
Notes:																
Persons with Disabilities																
Number Applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Promotions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Veterans																
Number Applied	1	-	1	-	-	-	-	-	-	-	-	-	-	-	-	-
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

Appendix D: Employment Practices Analysis

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
1 - Officials & Administrators																
Total Workforce	2	2	2	2	-	-	-	-	-	-	-	-	-	-	-	-
Total Trained	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Training 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 Highest Rate	NA	NA	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)	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
2 - Professionals																
Total Workforce	2	1	2	1	-	-	-	-	-	-	-	-	-	-	-	-
Total Trained	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Training 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 Highest Rate	NA	NA	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)	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
3 - Technicians																
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
4 - Protective Service																
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
5 - Paraprofessional																
Total Workforce	1	5	1	4	-	-	-	-	-	-	-	-	-	-	-	1
Total Trained	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Training 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	0.0%
Ratio to Highest Rate	NA	NA	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)	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	No
6 - Administrative Support																
Total Workforce	1	7	1	6	-	-	-	-	-	-	-	-	-	-	-	1
Total Trained	-	3	2	-	-	-	-	-	-	-	-	-	-	-	-	1
Training Rate	0.0%	42.9%	0.0%	33.3%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.0%
Ratio to Highest Rate	NA	100.0%	0.0%	33.3%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.0%
Potential Adverse Impact (Yes/No)	No	No	Yes	Yes	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	No
7 - Skilled Craft																
Total Workforce	6	-	5	-	-	-	-	-	1	-	-	-	-	-	-	-
Total Trained	1	-	1	-	-	-	-	-	-	-	-	-	-	-	-	-
Training Rate	16.7%	N/A	20.0%	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	N/A	No	N/A	N/A	N/A	N/A	N/A	Yes	N/A	N/A	N/A	N/A	N/A	N/A	N/A
8 - Service-Maintenance																
Total Workforce	49	17	44	13	-	-	-	2	2	1	2	1	-	-	1	-
Total Trained	3	2	3	2	-	-	-	-	-	-	-	-	-	-	-	-
Training Rate	6.1%	11.8%	6.8%	15.4%	N/A	N/A	N/A	0.0%	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	52.0%	100.0%	44.3%	100.0%	N/A	N/A	N/A	0.0%	0.0%	N/A	0.0%	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	Yes	Yes	N/A	Yes	N/A	N/A	N/A	N/A	N/A

Appendix D: Employment Practices Analysis

Four-Fifths Adverse Impact Analysis by Job Category: Terminations

Job Category (Use EEO-4)	Total		W		AI/AN		B		H/L		A		NHOP		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
1 - Officials & Administrators																
Total Workforce	2	2	2	2			-	-	-	-	-	-	-	-	-	-
Total Involuntary Terminations	-	-	-	-			-	-	-	-	-	-	-	-	-	-
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
2 - Professionals																
Total Workforce	2	1	2	1			-	-	-	-	-	-	-	-	-	-
Total Involuntary Terminations	-	-	-	-			-	-	-	-	-	-	-	-	-	-
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
3 - Technicians																
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
4 - Protective Service																
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
5 - Paraprofessional																
Total Workforce	1	5	1	4			-	-	-	-	-	-	-	-	-	1
Total Involuntary Terminations	-	-	-	-			-	-	-	-	-	-	-	-	-	-
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	0.0%
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	100.0%
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	No
6 - Administrative Support																
Total Workforce	2	6	1	6			-	-	-	-	1	-	-	-	-	-
Total Involuntary Terminations	-	1	-	1			-	-	-	-	-	-	-	-	-	-
Involuntary Termination Rate	0.0%	16.7%	0.0%	16.7%	N/A	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	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	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	N/A	N/A	N/A	N/A	No	N/A	N/A	N/A	N/A	N/A
7 - Skilled Craft																
Total Workforce	6	-	5				-	-	1	-	-	-	-	-	-	-
Total Involuntary Terminations	1	-	1				-	-	-	-	-	-	-	-	-	-
Involuntary Termination Rate	16.7%	N/A	20.0%	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	N/A	No	N/A	N/A	N/A	N/A	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A
8 - Service-Maintenance																
Total Workforce	49	17	44	13			-	2	2	1	2	1	-	-	1	-
Total Involuntary Terminations	5	3	5	3			-	-	-	-	-	-	-	-	-	-
Involuntary Termination Rate	10.2%	17.6%	11.4%	23.1%	N/A	N/A	N/A	0.0%	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	57.8%	0.0%	0.0%	N/A	N/A	N/A	100.0%	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	Yes	N/A	N/A	N/A	No	No	N/A	No	N/A	N/A	N/A	N/A	N/A

Four-Fifths Adverse Impact Analysis by Job Category: Discipline

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Four-Fifths Adverse Impact Analysis by Job Category: Discipline

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Four-Fifths Adverse Impact Analysis by Job Category: Discipline

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Four-Fifths Adverse Impact Analysis by Job Category: Discipline

Notes: 8 - Service Maintenance White Female - over 27% of Written Warnings are same employee, and another 18% is same employee