

AGENDA ITEM 1E
Consent Item

MEMORANDUM

DATE: August 4, 2022
TO: El Dorado County Transit Authority
FROM: Maria Harris, Human Resources Manager
SUBJECT: El Dorado County Transit Authority Revised Equal Employment Opportunity Program

REQUESTED ACTION:

BY MOTION,

Adopt Resolution No. 22-18 adopting the El Dorado County Transit Authority Equal Employment Opportunity Program (EEOP)

BACKGROUND

As a public transit operator and Federal Transit Administration (FTA) sub-recipient, the El Dorado County Transit Authority (El Dorado Transit) is required to comply with the updated FTA Circular 4701.1A when an organization reaches the following thresholds (requiring the agency to have an abbreviated EEOP):

- Employs between 50-99 transit related employees, and
- Requests or receives capital or operating assistance in excess of \$1 million in the previous Federal fiscal year, or
- Requests or receives planning assistance in excess of \$250,000 in the previous federal fiscal year.

DISCUSSION

Pursuant to the applicability of the FTA Circular 4704.1A smaller agencies are not required to conduct a utilization analysis with goals and timetables or to submit the EEOP to FTA every four (4) years. Instead, smaller agencies are required to provide the EEOP to FTA if requested by the Office of Civil Rights or for any State Management Review or Triennial Review.

The updated EEOP was reviewed and approved by the Liaison of the El Dorado Transit 5311 Grant Program from State of California Department of Transportation. The approval letter and EEOP documents are attached for review.

FISCAL IMPACT

None

DEPARTMENT OF TRANSPORTATION
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*Making Conservation
a California Way of Life.*

June 13, 2022

El Dorado County Transit Authority
ATTN: Maria Harris
6565 Commerce Way
Diamond Springs, CA 95619

Dear Ms. Harris:

Re: Equal Employment Opportunity (EEO) Plan Acceptance

Thank you for submitting the El Dorado County Transit Authority Abbreviated EEO Plan. The CA Department of Transportation, EEO Office, has reviewed your draft plan and has determined that it meets the requirements set forth in the Federal Transit Administration's (FTA) EEO Circular, 4704.1A, "Equal Employment Opportunity (EEO) Requirements and Guidelines for Federal Transit Administration Recipients," revised April 20, 2017.

Please upload your agency's approved EEO Plan and this letter into the BlackCat system under the "Important Documents" tab.

Your next EEO Plan must be updated and submitted by June 2026.

We thank you for partnering with us to meet the FTA compliance requirements. Please feel free to contact me at (916) 657-5206, should you have any questions or need immediate technical assistance. I can also be reached by e-mail at Sharon_Beasley@dot.ca.gov

Sincerely,

Sharon Beasley
SHARON BEASLEY
Federal Transit Policies and Reporting
Office of Federal Programs
Transit Grants and Contracts

**EQUAL EMPLOYMENT OPPORTUNITY
PROGRAM (EEOP)**

for

EL DORADO COUNTY TRANSIT AUTHORITY

**6565 Commerce Way
Diamond Springs, CA 95619
(530)642-5383**

2022-2026

EL DORADO COUNTY TRANSIT AUTHORITY
6565 Commerce Way
Diamond Springs, CA 95619
(530)642-5383

EEO/AFFIRMATIVE ACTION PLAN (EEOP)
2022-2026

APPROVAL SECTION:

Program Plan Completed by: *Maria Harris*
Maria Harris
Human Resources Manager/AA Officer
(530)642-5383 ext. 209
mharris@eldoradotransit.com

Program Plan Approved by: *Brandi Cottonreader*
Brandi Cottonreader, EEO
California Department of Transportation

EL DORADO COUNTY TRANSIT AUTHORITY EEOP

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INTRODUCTION
23 CFR 230, Subpart C Appendix A Part II

Background:

EL DORADO COUNTY TRANSIT AUTHORITY was established in 1994 in the State of California

Following are matters that should be included in this section:

- 1. Provide brief history of the El Dorado County Transit Authority*
- 2. Locations whose employees are included in this EEOP*
- 3. Narrative on the products and services*
- 4. Narrative on significant changes in top management personnel or major reorganizations affecting the EDCTA.*
- 5. Business view of the present and anticipated economic picture in EDCTA's area*
- 6. Narrative on the nature and extent of the government contract (an approximate percentage of the total work should also be included).*

PROGRAM TERMINOLOGY

The terms, "comparison of incumbency to availability," "deficiency," and "problem area," appearing in this EEOP, are terms EL DORADO COUNTY TRANSIT AUTHORITY is required by government regulations to use. The criteria used in relation to these terms are those specified by the government. These terms have no independent legal or factual significance whatsoever. Although EL DORADO COUNTY TRANSIT AUTHORITY will use the terms in total good faith in connection with its EEOP, such use does not necessarily signify that the EL DORADO COUNTY TRANSIT AUTHORITY agrees that these terms are properly applied to any particular factual situation and is not an admission of non-compliance with EEO laws, regulations, and objectives.

The comparison of incumbency to availability contained herein is required by Government regulations to be based on certain statistical comparisons. Geographic areas and sources of statistics used herein for these comparisons were used in compliance with Government regulations, as interpreted by Government representatives. The use of certain geographic areas and sources of statistics does not indicate EL DORADO COUNTY TRANSIT AUTHORITY's agreement that the geographic areas are appropriate in all instances of use or that the sources of statistics are the most relevant. The use of such geographic areas and statistics may have no significance outside the context of this EEOP. Such statistics and geographic areas will be used, however, in total good faith with respect to this EEOP.

The grouping of job titles into a given job group does not suggest that EL DORADO COUNTY TRANSIT AUTHORITY believes the jobs so grouped are of comparable worth.

CHAPTER 1: POLICY STATEMENT
23 CFR 230, Subpart C Appendix A Part II, § II B(1) and C(1)

It is the policy of EL DORADO COUNTY TRANSIT AUTHORITY and my personal commitment that equal employment opportunity be provided in the employment and advancement for all persons regardless of race, religion, color, national origin, sex, age, sexual orientation/gender identity and status as an individual with a disability at all levels of employment, including the executive level. EL DORADO COUNTY TRANSIT AUTHORITY does not and will not discriminate against any applicant or employee regardless of race, religion, color, national origin, sex, age, sexual orientation/gender identity and status as an individual with a disability to any position for which the applicant or employee is qualified. In addition, EL DORADO COUNTY TRANSIT AUTHORITY is committed to a policy of taking affirmative action to employ and advance in employment qualified employees with disability. Such affirmative action shall apply to all employment practices, including, but not limited to hiring, upgrading, demotion or transfer, recruitment, recruitment advertising, layoff or termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship and on-the-job training. Decisions related to personnel policies and practices shall be made on the basis of an individual's capacity to perform a particular job and the feasibility of any necessary job accommodation. EL DORADO COUNTY TRANSIT AUTHORITY will make every effort to provide reasonable accommodations to any physical and mental limitations of individuals with disabilities and to disabled veterans.

Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion or discrimination because they have engaged in or may engage in any activity protected by state, federal or local anti-discrimination laws including the following filing a complaint.

Our obligations in this area stem from not only adherence to various state and federal regulations, but also from our commitment as an employer in this community to provide job opportunities to all persons regardless of race, religion, color, national origin, sex, age, sexual orientation/gender identity and status as a protected veteran or an individual with disability. EL DORADO COUNTY TRANSIT AUTHORITY's EEO policy and affirmative action obligations include the full support from the Executive Director, Mindy Jackson.

EL DORADO COUNTY TRANSIT AUTHORITY will also continually design and implement audit and reporting systems that will measure the effectiveness and the compliance of the EEOP, identify the need for remedial actions, determine if objectives were attained, and determine if opportunities to participate in company-sponsored activities were extended to all employees and applicants.

If you have any questions regarding our equal employment opportunity, harassment policies or the complaint procedure, you may contact your local Human Resources representative. Parts of the Affirmative Action Plan may be reviewed, as appropriate, by making an appointment with the Human Resources Manager/AA Officer.

(Signature)
Executive Director
6/13/2022

CHAPTER 2: ESTABLISHMENT OF RESPONSIBILITIES FOR IMPLEMENTATION OF THE EEOP

23 CFR 230, Subpart C Appendix A Part II, § II A(2) and B(2)

As part of its efforts to ensure equal employment opportunity to all individuals, EL DORADO TRANSIT AUTHORITY has designated specific responsibilities to various staff to ensure the EEOP focuses on all components of the employment system. To that end, the Executive Director, the Human Resources Manager/ AAOfficer, and those employed as supervisors and managers have undertaken the responsibilities described below.

Executive Director

The primary responsibility and accountability for implementing the EEOP rests with the Executive Director. This person is responsible, through the Human Resources Manager/AA Officer for adherence to EL DORADO COUNTY TRANSIT AUTHORITY's policy of equal employment opportunity and affirmative action. This role includes, but is not limited to, the following duties:

1. Designate appropriate personnel with the responsibility for overseeing, administering, implementing, and monitoring EL DORADO COUNTY TRANSIT AUTHORITY's EEOP. Ensure that these personnel are identified in writing by name and job title.
2. Ensure that those designated personnel responsible for all EEOP components are given the necessary authority and top management support and staffing to successfully implement their assigned responsibilities.
3. Impart the personal direction that ensures total involvement and commitment to equal employment opportunity programs through EL DORADO COUNTY TRANSIT AUTHORITY's EEOP.

Human Resources Manager/AA Officer

The Human Resources Manager/AA Officer under the direct supervision of the Executive Director, is responsible for overall supervision of the EEOP and serves as a checks and balance of employment practices. The Human Resources Manager/AA Officer ensures, that all relevant policies and procedures are adhered to. Successful implementation of this program is a basis for evaluating the Human Resources Manager's/AA Officer's effective work performance. The Human Resources Manager's/AA Officer's responsibilities include, but are not limited to, the following:

1. Ensure that EL DORADO COUNTY TRANSIT AUTHORITY adheres to the stated policy of equal employment opportunity and monitor the application of equal employment opportunity policies.
2. Ensure that the EEOP is reviewed and updated annually in accordance with EL DORADO COUNTY TRANSIT AUTHORITY's stated policy.

3. Participate in periodic discussions with management, supervision, and all other employed personnel to ensure EEOP and equal employment opportunity policies are being followed.
4. Review the qualifications of all employees to ensure equitable opportunity, based on job-related employment practices, is given to all for transfers and promotions.
5. Conduct periodic audits of: 1) training programs and hiring and promotion patterns to remove impediments to the attainment of EEOP goals and objectives, 2) facilities to ensure they are maintained for the use and benefit of all employees and integrated both in policy and practice, and 3) sponsored educational, training, recreational, and social activities to ensure that all employees are encouraged to participate in accordance with policies on non-discrimination.
6. Ensure that all new employees receive a special orientation to EL DORADO COUNTY TRANSIT AUTHORITY's equal employment opportunity policy and are thoroughly informed with regard to the EEOP and its objectives.
7. Periodically analyze applicant flow to determine the mix of persons applying for employment by race/ethnic origin and gender.
8. Review all job descriptions and specifications to ensure they are free of discriminatory provisions and artificial barriers. Ensure that all requirements are job-related, that they are realistic, and that they reflect the actual work requirements of the essential job duties.
9. Provide direction to EL DORADO COUNTY TRANSIT AUTHORITY's employees, as necessary, to carry out all actions required to meet the Company's equal employment opportunity and affirmative action commitments.
10. Review, report on, and update EL DORADO COUNTY TRANSIT AUTHORITY's EEOP at least on an annual basis in accordance with stated policy.
11. Responsible for the design and effective implementation of the EEOP at all establishments.
12. Develop, implement, and maintain audit and reporting systems to measure effectiveness of equal employment opportunity programs, including those that will indicate the need for remedial action and determine the degree to which goals and objectives have been obtained.
13. Advise management in the modification and development of EL DORADO COUNTY TRANSIT AUTHORITY's policies to ensure the enhancement of equal employment opportunity for all employees and potential employees within existing equal employment opportunity guidelines.

14. Conduct periodic audits to ensure all required posters and those advertising EL DORADO COUNTY TRANSIT AUTHORITY's equal employment opportunity policies and EEOP are displayed and that EL DORADO COUNTY TRANSIT AUTHORITY's equal employment opportunity and EEOP policies are being thoroughly communicated.
15. Assist in review and revision of all policies, procedures, and rules to ensure they are not in violation of federal or state laws and regulations.

Managers and Supervisors

In their direct day-to-day contact with EL DORADO COUNTY TRANSIT AUTHORITY's employees, managers and supervisors have assumed certain responsibilities to help the Company ensure compliance with equal employment opportunity programs and effective implementation of the EEOP. These include, but are not limited to, the following:

1. Aggressively adhere to EL DORADO COUNTY TRANSIT AUTHORITY's equal employment opportunity and affirmative action policy.
 - A. Support and assist the Human Resources Manager/ AAOfficer in developing, maintaining, and successfully implementing the EEOP.
 - B. Complete progress reports regarding the status of goal achievement.
 - C. Take action to prevent harassment of employees placed through affirmative action efforts.
2. Assign employees to significant jobs that might lead to greater personal growth and value, and counsel them with respect to what is needed for upward mobility within the employment structure.
3. Ensure that all interviews, offers of employment and/or wage commitments are consistent with EL DORADO COUNTY TRANSIT AUTHORITY's policy.
4. Implement the internal promotion and transfer of all employees under their supervision consistent with EEOP goals and objectives.
5. Assist in identifying problem areas and provide needed information for establishing and meeting department affirmative action goals and objectives.

**CHAPTER 3: SURVEY OF THE LABOR MARKET AREAS (IN TERMS OF
POPULATION MAKEUP, SKILLS, AND AVAILABILITY FOR EMPLOYMENT)
23 CFR 230, Subpart C Appendix A Part II, § II B (3)**

WORKFORCE OVERVIEW:

As of 7/1/2021, EL DORADO COUNTY TRANSIT AUTHORITY employed 56 persons in its workforce.

Permanent

- 30.3% (17) are women
- 7.1% (4) are minorities

Temporary

- 0 % (0) are women
- 0 % (0) are minorities

PLAN METHODOLOGY:

- The 2020 Census data was used for the availability analysis of this plan
- Training and promotion data were obtained from El Dorado County Transit Authority personnel records
- The database of employees and the resultant employee count used in this plan was obtained from El Dorado County Transit Authority that included permanent, seasonal, and temporary employees on the roster at the time.

**CHAPTER 4: DEVELOPMENT AND IMPLEMENTAION OF SPECIFIC PROGRAMS
TO ELIMINATE DISCRIMINATORY BARRIERS & ACHIEVE GOALS
23 CFR 230, Subpart C Appendix A Part II § II, C 3(a)-(f)**

EL DORADO COUNTY TRANSIT AUTHORITY tailors our action-oriented programs each year to ensure they are specific to the problem identified.

Action-Oriented Program:

The Action-Oriented Programs designed to address the underutilization of women and minorities are listed below. These Action-Oriented Programs will be carried-out throughout the EEOP year. The Human Resources Manager/AA Officer, with the help of the managers, will be responsible in ensuring that the following are implemented.

A. Assessment and Employment Practices:

EL DORADO COUNTY TRANSIT AUTHORITY implemented a hiring freeze and reduction in force effective July 13, 2020, in response to immediate significant ridership loses, program closures and state-wide public health directive due to the COVID-19 health emergency.

EL DORADO COUNTY TRANSIT AUTHORITY suspended some services beginning in early March 2020 and anticipated significant, long-term deficits in major revenue sources that required substantial reductions in expenditures across all major operating budget categories specifically within the workforce.

Staffing levels were reduced from sixty-four (64) allocated full-time equivalent (FTE) positions to forty-six (46) FTE's. Achieving the appropriate and fiscally sustainable staffing levels during and after the pandemic required EL DORADO COUNTY TRANSIT AUTHORITY to restructure its operation and eliminate positions, including Transit Operators and unrepresented employees across multiple departments. The number of layoffs and/or recalls that were necessary within individual classifications varied over the course of the 2020/2021 fiscal year based on attrition and staffing adjustments necessary to meet operational needs. As a result, there were two (2) female and zero (0) minority job eliminations.

Beginning in July 2021, EL DORADO COUNTY TRANSIT AUTHORITY began the process of restoring transit services that were eliminated and/or reduced in the prior fiscal year. Notices of restoration were provided to laid off employees and six (6) of the nine (9) Transit Operators who were affected by the layoff returned to work in some capacity. In August 2021, EL DORADO COUNTY TRANSIT AUTHORITY resumed active recruiting for open positions to fill the employment gaps.

Prior to the COVID-19 pandemic, EL DORADO COUNTY TRANSIT AUTHORITY implemented a New Hire and Employee Referral Program. Attracting and maintaining top driving talent requires strategic recruitment initiatives that are sourced and driven to attract qualified

individuals. The competition to attract qualified candidates among transit agencies within the region has created a challenge in recruiting. The New Hire award bonus was increased from \$1,000 to \$2,000 in February 2022 to draw in candidates who would otherwise look elsewhere within the county and beyond for gainful employment.

As EL DORADO COUNTY TRANSIT AUTHORITY continues to restore and expand services, improvements in utilization shall focus recruitment efforts in making every attempt to seek out minorities, both male and female for all open positions when they become available. In developing goals and timelines to correct underutilization, EL DORADO COUNTY TRANSIT AUTHORITY shall use the following guidelines:

1. Involve personnel staff, managers, and supervisors in the process.
2. Set goals that are significant, measurable, and attainable.
3. Consider anticipated attrition, expansion, turnover in the work force and availability of persons with required skills.
4. Consider effects of existing employment practices that may contribute to underutilization in increasing availability of minorities and women.

The racial make-up of the population of EL DORADO COUNTY TRANSIT AUTHORITY'S services areas is predominantly white, (i.e., 88.6% U.S. Census Bureau; CENSUS 2020). This presents a unique challenge.

EL DORADO COUNTY TRANSIT AUTHORITY will regularly analyze all employment practices relating to recruitment, selection, salaries, promotions, terminations, and standards of discipline.

EL DORADO COUNTY TRANSIT AUTHORITY will continue to do the following:

1. Perform periodic review to correct inaccurate position descriptions and to ensure that positions are allocated to the appropriate classification;
2. Ensure that all job qualification requirements are closely related to the job;
3. Provide counseling and guidance to employees;

B. Recruitment, Placement, and Hiring Applicant Flow Analysis:

EL DORADO COUNTY TRANSIT AUTHORITY will continue to do the following:

1. Ensure active recruitment efforts to support and supplement those of the central personnel agency or department, reaching all appropriate sources to obtain qualified employees on a nondiscriminatory basis.
2. Maintain contracts with organizations representing minority groups, women, professional societies, and other sources of candidates for technical, professional and management level positions.
3. Ensure that recruitment literature is relevant to all employees, including minority groups

and women.

4. Review and monitor recruitment and placement procedures so as to assure that no discriminatory practices exist.
5. Cooperate with management and the Human Resources Department on the review and validation of written tests and other selection devices.
6. Analyze the flow of applicants through the selection and appointment process, including an analytical review of reasons for rejections.
7. Monitor the placement of employees to ensure the assignment of work and workplace on a nondiscriminatory basis.

C. Promotions

EL DORADO COUNTY TRANSIT AUTHORITY will continue to do the following:

1. Assure that all job vacancies are posted conspicuously and that all employees are encouraged to bid on all jobs for which they feel they are qualified.

D. Training

EL DORADO COUNTY TRANSIT AUTHORITY will continue to do the following:

1. Require managers and supervisors to participate in EEO seminars covering the EEOP, the overall EEO program and the administration of the policies and procedures incorporated therein, and on Federal, State and local laws relating to EEO.
2. Train in proper interviewing techniques of employees who conduct employment selection interviews.

E. Layoffs, recalls, discharges, demotions, and disciplinary actions

The standards for deciding when a person shall be terminated, demoted, disciplined, laid off or recalled should be the same for all employees, including minorities and females. Seemingly neutral practices are re-examined to see if they have a disparate effect on such groups. For example, if more minorities and females are being laid off because they were the last hired, then, adjustments are made to assure that the minority and female ratios do not decrease because of these actions.

1. When employees, particularly minorities and females, are disciplined, laid off, discharged or downgraded, the HR Manager/AA Officer reviews the actions before they become final.
2. Any punitive action (i.e. harassment, terminations, demotions), taken as a result of employees filing discrimination complaints, is illegal.
3. The following records should be kept to monitor this area of the internal EEO program:
 - a. On all terminations, including layoffs and discharges: indicate total number, name, (home address and phone number), employment date, termination date, recall rights, sex, racial/ethnic identification (by job category), type of termination and reason for

termination.

- b. On all demotions: indicate total number, name, (home address and phone number), demotion date, sex, racial/ethnic identification (by job category), and reason for demotion.
- c. On all recalls: indicate total number, name, (home address and phone number) recall date, sex, and racial/ethnic identification (by job category).

4. Exit interviews should be conducted with employees who leave the employment of the EL DORADO COUNTY TRANSIT AUTHORITY.

F. Other personnel actions

EL DORADO COUNTY TRANSIT AUTHORITY will continue to do the following:

- 1. Provide assurance that information on EEO counseling and grievance procedures is easily available to all employees.
- 2. Develop and implement a system for processing complaints alleging discrimination because of race, color, religion, sex or national origin to an impartial body.
- 3. Develop and implement a system for processing grievances and appeals (i.e. disciplinary actions, adverse actions, adverse action appeals, etc.).
- 4. Include in the performance appraisal system a factor to rate manager's and supervisors' performance in discharging the EEO program responsibilities assigned to them.
- 5. Review and monitor the performance appraisal program periodically to determine its objectivity and effectiveness.
- 6. Ensure the equal availability of employee benefits to all employees.

CHAPTER 5: AFFIRMATIVE EMPLOYMENT PROGRAM SPECIFIC BARRIER ANALYSIS

23 CFR 230, Subpart C Appendix A Part II § I-General 23 CFR 230, Subpart C Appendix A Part II, § C 4-Program Evaluation

The major part of an EEOP must be a recognition and removal of any barriers to Equal Employment Opportunity identification of problem areas and/or persons unfairly excluded and action enabling them to compete for jobs on an equal basis.

In addition to comparing incumbency to availability within job groups, EL DORADO COUNTY TRANSIT AUTHORITY has conducted studies to identify problem areas in each of its, organizational units, management responsibilities, employee complaints, traditions, and opportunities through the selection procedures (i.e., hires, promotions, and terminations). EL DORADO COUNTY TRANSIT AUTHORITY will continue to monitor and update these studies during each EEOP year. In each case where potential problem areas have been identified, affirmative actions, as appropriate, will be taken consistent with any of the action-oriented programs described in Chapter 5 of this EEOP.

Goals are established within each of the job groups at no less than the current availability data for the job group.

Background: Due to the geographic region of El Dorado County Transit Authority our applicant pool is very limited. We have been working with other local agencies to improve job recruitment awareness for our agency with the intent on making our applicant pool more robust.

Organizational Unit – *barriers within the organizational unit may be found when there is an absence of knowledge, skills, and abilities to perform the job versus the number of class members within the workforce and recruiting areas.*

Management Responsibilities – *When managers and supervisors fail to meet their responsibilities, organizational units have a high turnover ratio for minorities, females, and persons with disabilities, and manifest imbalance and conspicuous absence prevails. The sources of these problems may be job descriptions, performance evaluations, or lack of career development or leadership skills of the managers and supervisors.*

Employee Complaints – *Managers must realize that most employee complaints are generated by the belief (whether based on perception or reality) that the total agency system is not functioning correctly because of institutional opportunity barriers.*

Traditions – *The resistance to change is so great that the climate for affirmative employment is not permitted by perpetuating going things in the traditional way.*

Opportunities – *Opportunities can be forecasted in terms of personnel and resources.*

CHAPTER 6: PROGRAM EVALUATION
23 CFR 230, Subpart C Appendix A Part II, § II C(4)

Inherent in the EEOP is the need for periodic self-assessment of problems encountered, corrective action taken, and progress made. Self-evaluation requires complex record keeping systems on applicants, employees, and components of the EEOP itself. Periodic reports from supervisors, department managers, the Human Resources Manager/AA Officer, and other relevant persons are required.

The objective of all record keeping systems to be implemented is to assess the results of past actions, trends, the appropriateness of goals and objectives, the appropriateness and relevancy of identified solutions to problems, and the adequacy of the Plan as a whole. In addition, a further objective is to identify the proper corrective actions to be made to all components.

In order to fully achieve the objectives of such a record keeping system, the results of it must lead to follow-up through feedback to managers, supervisors, and staff, through reallocation of resources, through modifications to plans and the record keeping system itself, through appropriate recognition of personal achievements as well as punitive actions for discriminatory acts. For any identified deficiencies, appropriate corrective action will be identified and implemented.

The records that are maintained are the basis for updating the affirmative action plan, including revising the availability data and establishing annual numerical goals. The internal audit and reporting system is used as the basis for evaluating systemic, results-oriented programs and affirmative action efforts.

The EL DORADO COUNTY TRANSIT AUTHORITY auditing and reporting system periodically measures the effectiveness of its total affirmative action program. The Human Resources Manager/AA Officer:

1. Monitors records of all personnel activity, including referrals, placements, transfers, promotions, terminations, and compensation, at all levels to ensure the nondiscriminatory policy is carried out;
2. Requires internal reporting on a scheduled basis as to the degree to which equal employment opportunity and organizational objectives are attained;
3. Reviews report results with all levels of management; and
4. Advises top management of program effectiveness and submit recommendations to improve unsatisfactory performance.

CHAPTER 7: PUBLICIZE THE EEOP
23 CFR 230, Subpart C Appendix A Part II, § II C 2(a)(b)

External Dissemination:

The following activities will be implemented or continued to further enhance our affirmative action efforts. All activities are the responsibility of the Human Resources Manager/AA Officer.

- 1) Initiate and maintain communication with organizations having special interests in the recruitment of women and minorities.
- 2) Include diverse group of employees when they are pictured in consumer, promotional, or help wanted advertising.
- 3) Disseminate information concerning employment opportunities to radio and television stations, and to publications that primarily reach women and minorities.
- 4) Provide information emphasizing job opportunities to all local educational institutions, public and private.
- 5) Inform all recruiting sources, in writing and orally, of the agency's affirmative action policy.
- 6) List with the State Employment Development Department all suitable job openings.
- 7) Send written notification of the agency's affirmative action policy to all subcontractors, vendors, and suppliers requesting appropriate action on their part.
- 8) Conduct formal briefing sessions with representatives from recruiting sources. Include as part of the briefing sessions, facility tours, clear and concise explanations of current and future job openings, position descriptions, worker specifications, explanations of the Company's selection process, and recruiting literature. Arrange for referral of applicants, follow up with sources, and feedback on disposition of applicants.

Internal Dissemination:

In order to gain positive support and understanding for the affirmative action program, EL DORADO COUNTY TRANSIT AUTHORITY will implement or continue to implement the following internal dissemination procedures, all of which are the responsibility of the Human Resources Manager/AA Officer. The following policies and procedures are designed to foster support and understanding from EL DORADO COUNTY TRANSIT AUTHORITY's executive staff, management, supervisors, and other employees in an effort to encourage all employees to take the necessary actions to aid EL DORADO COUNTY TRANSIT AUTHORITY in meeting its obligations.

- 1) Include the policy in the Company's policy manual and other in-house publications.
- 2) Conduct special meetings with executive, management, and supervisory personnel to explain the intent of the policy and individual responsibility for effective implementation, making clear the Executive Director's attitude.
- 3) Schedule training sessions for all employees involved in recruiting, selection, promotion, and other related employment issues for women and minorities.
- 4) Discuss the policy thoroughly in both employee orientation and management training programs.
- 5) Inform union officials of the contractor's policy, and request their cooperation.
- 6) Include non-discrimination clauses in all union agreements, and review all contractual provisions to ensure they are non-discriminatory.
- 7) Post the policy on agency bulletin boards, along with the agency's harassment policy which includes protection from harassment on the basis of disability.

CHAPTER 8: EEO COMPLAINT PROCEDURE
23 CFR 230, Subpart C Appendix A Part II, § II B(11)

EL DORADO COUNTY TRANSIT AUTHORITY has a very exhaustive and detailed Internal Complaint Policy and Procedure whereby employees and applicants may process allegations of discrimination to an impartial body without fear of reprisal.

The EL DORADO COUNTY TRANSIT AUTHORITY's Human Resources Manager/AAOfficer, together with EEO counselors, investigators, counsels, management and supervisors are responsible for ensuring that the procedure are appropriately carried out. The procedure provides prohibition of retaliation or reprisals against complainants or the agency's employees involved in processing complaints, with appropriate disciplinary measure for officials found to have taken reprisal and/or retaliatory actions. A record of all investigations is maintained in an electronic database. Reporting and analysis is completed on a quarterly basis.

Please see the attached copy of the complaint process document.

**EL DORADO COUNTY TRANSIT AUTHORITY
RESOLUTION NO. 22-18**

**RESOLUTION OF THE BOARD OF DIRECTORS OF THE
EL DORADO COUNTY TRANSIT AUTHORITY
ADOPTING THE EQUAL EMPLOYMENT OPPORTUNITY PROGRAM**

WHEREAS, El Dorado County Transit Authority (El Dorado Transit) as a public transit operator and Federal Transit Administration (FTA) sub-recipient is required to comply with FTA Circular 4701.1A requiring an agency to have an abbreviated Equal Employment Opportunity Program (EEOP); and

WHEREAS, the initial EEOP was prepared in June 2016; and

WHEREAS, any FTA sub-recipient who meets both of the following threshold requirements, must prepare and maintain an abbreviated EEO Program:

- Employs between 50-99 transit-related employees, and
- Requests or receives capital or operating assistance in excess of \$1 million in the previous Federal fiscal year, or requests or receives planning assistance in excess of \$250,000 in the previous Federal fiscal year.

WHEREAS, the EEOP includes an updated narrative including an up to date Workforce Overview and expanded Job Restructuring and Upward Mobility report; changes necessary to comply with updated regulations pursuant to the revised thresholds; and

WHEREAS, the EEOP contains all federal regulations; and

WHEREAS, the EEOP has been reviewed and approved by the Liaison of the El Dorado Transit 5311 Grant Program from the State of California Department of Transportation; and

NOW, THEREFORE, BE IT HEREBY RESOLVED BY THE BOARD OF DIRECTORS OF THE EL DORADO COUNTY TRANSIT AUTHORITY: The Board adopts the attached revised Equal Employment Opportunity Program of the El Dorado County Transit Authority.

PASSED AND ADOPTED BY THE GOVERNING BOARD OF THE EL DORADO COUNTY TRANSIT AUTHORITY at a regular meeting of the Board held on the 4th day of August 2022, by the following vote of the Board:

AYES:

NOES:

ABSTAIN:

ABSENT:

John Hidahl, Chairperson

ATTEST:

Megan Wilcher, Secretary to the Board