

EQUAL EMPLOYMENT OPPORTUNITY PROGRAM

CITY OF PHOENIX
PUBLIC TRANSIT
DEPARTMENT

March 1, 2020 – February 29,
2024

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2.2.1 Statement of Policy

City of Phoenix Public Transit

Equal Employment Opportunity Policy Statement

The City of Phoenix Public Transit Department has a strong commitment to the community we serve and to our employees. As an equal opportunity employer, we strive to maintain 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.

The Public Transit Department's 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.

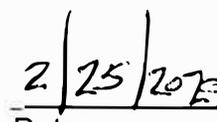
The Public Transit Department is committed to providing reasonable accommodations to applicants and employees who require such due to a disability or to practice or observe their religion, absent undue hardship. As the City of Phoenix's Public Transit Department Director, I, Jesús Sapien, maintain overall responsibility and accountability for Public Transit's compliance with its EEO Policy and Program. To ensure day-to-day management, including program preparation, monitoring, and complaint investigation, I have appointed Shelley Reimann as Public Transit's EEO Officer. Ms. Reimann can be reached at 302 North 1st Avenue, Suite 900, Phoenix, AZ 85003, 602-261-8997. Ms. Reimann reports directly to me and can act with my authority on such matters with all levels of management, labor unions, and employees.

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

The Public Transit Department 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.



Jesús Sapien



Date

Agency Overview

The Phoenix Public Transit Department is one of 28 departments/offices within the City of Phoenix governmental structure. With more than 14,000 employees the City of Phoenix Human Resources Department acts as the clearinghouse for all recruitment, personnel rules, discipline, and labor negotiations.

The Phoenix Public Transit Department is the primary recipient of federal funding for public transit in the region. With an annual operating budget of \$269.8 million and an administrative staff of 110 positions, the Phoenix Public Transit Department oversees and monitors the operations of three private companies that provide transit service to the city of Phoenix and other subrecipients, and provides oversight to the rest of the system's service provided by the regional public transit authority under the Valley Metro brand.

The Phoenix Public Transit Department is a member of the 16-agency regional transit system branded as 'Valley Metro'. In 1993, the Regional Public Transit Authority (RPTA) board adopted the name *Valley Metro* as the identity for the transit system in the Phoenix metropolitan area. Under the Valley Metro brand, local governments joined to fund the regional transit system the public sees on the streets today. Valley Metro Board member agencies include Avondale, Buckeye, Chandler, El Mirage, Gilbert, Glendale, Goodyear, Maricopa County, Mesa, Peoria, Phoenix, Scottsdale, Surprise, Tempe, Tolleson and Wickenburg.

The City of Phoenix directly manages its transit services including 38 local bus routes, six RAPID commuter routes, three neighborhood circulators, 1 downtown business circulator, paratransit service, and alternative transportation programs for seniors and people with disabilities. With a transportation fleet of approximately 629 buses covering 21.4 million revenue miles of service in the region, the department provides approximately 70 percent of the region's transit service. RPTA operates the remaining transit service in the region on behalf of Valley Metro member cities, including Phoenix.

3.9 million people live within ½-mile from Valley Metro-branded services.

The Phoenix Public Transit Department also has a leading role in the development and oversight of the region's 28-mile light rail line. Working with Valley Metro and other agency partners, Phoenix helps to deliver seamless regional transit services under the Valley Metro brand.

The City of Phoenix funds much of its transit service through Transit 2050, a local transportation sales tax approved by Phoenix voters in 2015, a portion of a regional transportation sales tax known as Proposition 400, and other federal, state and local sources.

Services provided under the Valley Metro brand by City of Phoenix and RPTA include:

- Local Fixed Route Bus Service: The city of Phoenix and RPTA operate sixty local

routes provided with 40- and 60-foot articulated buses. Within Phoenix city limits, local fixed route buses operate Monday-Thursday between 4 a.m. and 12 a.m., Friday between 4a.m. and 2 a.m., Saturday between 5 a.m. and 2 a.m., and Sunday between 5 a.m. and 11 p.m.

- Express Bus Service: There are Twenty-one regional express bus services that travel mostly along freeways with limited stops for faster connections. Routes are designed for commuter service and operate during peak periods.
- Neighborhood Circulators: Twenty-three community circulators operate continuously within distinct geographic areas to meet the transportation needs of the community.
- Light Rail: Valley Metro operates the region's light rail system which extends 28 miles serving the cities of Phoenix, Tempe and Mesa. Light rail operates Monday-Thursday between 4 a.m. and 12 a.m., Friday between 4 a.m. and 2 a.m., Saturday between 5 a.m. and 2 a.m., and Sunday between 5 a.m. and 11 p.m.
- Vanpool Program: Vanpool is a Transportation Demand Management program that helps decrease traffic congestion. The Valley Metro Vanpool program helps people connect with one another so that they can share rides or join a vanpool.
- Paratransit: Federally-required service which provides shared ride, door-to-door service to ADA-certified passengers, who because of a disability are unable to independently navigate local public transit services. Service operates within the defined Phoenix Dial-a-Ride service area and operates during the same hours as local bus and light rail. Paratransit vehicles can accommodate up to seven ambulatory passengers, or five ambulatory and two wheelchair passengers.
- Alternative Transportation: Provides alternative transportation solutions to older adults and ADA-certified residents of Phoenix. Service is provided through a network of private transportation providers through independently own and operate vehicles by participating transportation network drivers and taxi companies. Service is generally 24 hours a day, seven days a week.

2.2.2 Dissemination

To ensure the Equal Employment Opportunity (EEO) policy statement is publicized and disseminated, the Public Transportation Department (PTD) communicates its policy in the following manner:

Internal Dissemination

The EEO policy will be publicized internally by:

- Providing written communication from the Director of PTD to staff on changes to the EEO policy or program;
- Posting the policy statement and EEO materials, including federal statements and labor laws on bulletin boards in break rooms and employment offices;
- Including the EEO policy statement in the Public Transit employee on-boarding

- process and online for job postings;
- Distributing and explaining the EEO policy statement during new hire orientation;
 - Meeting with management officials semiannually to discuss the EEO Program and its implementation;
 - Meeting with employees to seek input on the program's implementation;
 - Encouraging and supporting employee participation in affinity groups;
 - Conducting periodic EEO training for employees and managers;
 - Conducting EEO training for all new supervisors and managers within 90 days of their appointment.

External Dissemination

The EEO Program is publicized externally by:

- Including the statement "The City of Phoenix is an equal opportunity employer" in recruitment advertisement (websites, paper postings, social media);
- Participating in outreach events including community, educational, minority- and women-based organizations, people with disabilities and veteran employment resources.

2.2.3 Designation of Personnel Responsibility

The responsibility for the overall implementation and administration of the Public Transit Department's EEO Program lies with the PTD Director, Jesús Sapien. His office is located at 302 North 1st Avenue Suite 900, Phoenix, AZ 85003. His telephone number is 602-534-6765. Mr. Sapien reports to the City of Phoenix City Manager's office. Each member of PTD's management team is responsible for the application of the policy for their respective areas.

Shelley Reimann is the designated Equal Employment Officer for the Department. Ms. Reimann is also responsible for reviewing the New Hire Concurrences and in conjunction with Human Resources reviewing the grievance procedure. Her office is located at 302 North 1st Avenue Suite 900, Phoenix, AZ 85003. Her telephone number is: 602-261-8997.

Anyone wishing to discuss matters regarding the EEO Program and/or policies should discuss them with Mr. Sapien or Ms. Reimann. All questions will be held in strict confidence. There will be no retaliation or adverse employment actions taken against persons discussing EEO concerns or matters.

The EEO program office responsibilities include:

- Developing the EEO policy statement and a written EEO Program.
- Assisting management in collecting and analyzing employment data, identifying problem areas, setting goals and time tables, and developing programs to achieve goals.

- Designing, implementing, and monitoring internal audit and reporting systems to measure program effectiveness and to determine where progress has been made and where proactive action is needed.
- Reviewing the agency's nondiscrimination plan with all managers and supervisors to ensure that the policy is understood.
- Concurring in the hiring and promotion process.
- In conjunction with the city's Human Resources Department, periodically reviewing employment practices policies (e.g., hiring, promotions, training), complaint policies, reasonable accommodation policies, performance evaluations, grievance procedures, and union agreements.
- Reporting at least semiannually to the PTD Director on the department's progress in relation to the department's goals and on contractor and vendor compliance.
- Serving as liaison between the agency, federal, state, county, and local governments, regulatory agencies, minority, women, disability organizations, and other community groups.
- Maintaining awareness of current EEO laws, and ensuring the laws affecting nondiscrimination are disseminated to responsible officials.
- Investigating complaints of EEO discrimination.
- Providing EEO training for employees and managers.
- In conjunction with the city's Human Resources Department, advising employees and applicants of available training programs and professional development opportunities and the entrance requirements.
- Auditing postings of the EEO policy statement to ensure compliance information is posted and up-to-date.

All managers and supervisors are responsible for ensuring EEO and must not discriminate based on a protected class and bear responsibility for ensuring that the EEO Program policies and programs are carried out. Managers and supervisors share in the responsibility for implementation of the EEO Program, and their performance will be evaluated on the success of the EEO Program in the same way they are assessed on other performance goals.

Management and supervisory personnel responsibilities include:

- Participating actively in periodic audits of all aspects of employment to identify and to remove barriers obstructing the achievement of specified goals and objectives.
- Holding regular discussions with other managers, supervisors, employees, and affinity groups to ensure agency policies and procedures are being followed.
- In conjunction with the EEO Officer, maintaining and updating the personnel database for generating reports required for the nondiscrimination program.
- Cooperating with the EEO Officer in review of information and investigation of complaints.

- Encouraging employee participation to support the advancement of the EEO Program.

2.2.4 Utilization & Workforce Analysis

Utilization Analysis

The utilization analysis of the current workforce (Attachment 1) identifies job categories that have an underutilization or concentration of minorities and women in relation to their availability in the relevant labor market. Underutilization is represented as a percentage greater than two percent. The underutilization is discussed and analyzed further in the long- and short-term goals.

Workforce and Availability Analysis

The workforce analysis is based on data for Maricopa County, Arizona derived from the 2010 Census report (U.S Census; American Fact Finder; “EEO 5r. Federal Sector Job Groups by Sex, and Race/Ethnicity for Residence Geography, Citizen”). The county database was used based on the City of Phoenix residency requirements (Personnel Rule 13). The City takes a multi-faceted approach with outreach and advertising of jobs and performs outreach and advertising to minority and underserved communities. The City utilizes online databases to reach the widest pool of job applicants possible. The workforce analysis includes a statistical breakdown of the workforce, by each department job category from when the department reached 100 employees (November 2018) through the submittal date of the cities EEO-4 form (September 30, 2019). Public Transit has staff in five of the eight categories: Officials and Administrators, Professionals, Technicians, Protective Service, and Administrative Support. All jobs within the department are listed in Attachment 2.

Sub-categories for male and female:

- W - White (not Hispanic or Latino)
- AI/AN - American Indian/Alaska Native (not Hispanic or Latino)
- B - Black or African American (not Hispanic or Latino)
- H/L - Hispanic or Latino
- A - Asian (not Hispanic or Latino)
- NHOPI - Native Hawaiian and Other Pacific Islander (not Hispanic or Latino)
- Multi - Multi, Two or more races (not Hispanic or Latino)

2.2.5 Goals and Timetables

The Public Transit Department will work in good faith to address any statistically significant level of underutilization found in the Utilization Analysis (Attachment 1). Short-term and long-term goals have been created from the analysis to address underutilization of protected groups and bring the department to parity. The short-term goals are to be addressed October 2019 through September 2020 and the long-term goals from October 2019 through September 2024. With the repercussions of the recession now past, the department is in a period of stability with most jobs being filled within four to twelve months of a departure of staff. The department does not currently foresee any major increase or decrease in staff size in the next four years.

These goals do not create guarantees for any particular group, nor are they meant to replace any steps in the hiring process. The goal-setting process is used to improve and measure the efficacy of the EEO Program and to prevent discrimination of any particular group. These goals are a proactive tool to ensure an inclusive department.

Goals will be evaluated annually to determine if any adjustments need to be made. Factors which may affect the goals are funding changes, department or city changes, or market changes in the public transportation industry. This awareness and flexibility will help in addressing our goals.

Long-Term and Short-Term Goals

2020 through 2024 Short-Term and Long-Term Goals

Job categories	Positions	Forecasted Short-Term vacancies 2020-2021	Short-Term Goal (2020-2021)	Long-Term Goal (2020-2024)	Minority /Female
Officials & Administrators	Special Projects Admin - 1	1 position	Increase 18%	Increase 18%	Female
Professionals	Various - 10; Planner, Accountant, Admin Asst.	4 positions	Increase 17%	Increase 17%	Female
Technicians	Engineering Tech - 1	1 positions	Increase 40%	Increase 40%	Female
Administrative Support	Various – 9; Account Clerk, Clerical Supervisor, Customer Service Clerk	3 positions	Increase 12%	Increase 37%	Female

Previous Goals 2014 to 2018

In 2014, the department submitted three goals which were not achieved (Attachment 3). For Professionals, the forecasted vacancies of 21 positions did not take place due partially to delayed retirement; however, 14 positions were filled, with 11 of the positions going to minority and females. A goal for 13 positions for Protective Service non-sworn positions was not met, although the department hired for nine positions. Of the nine positions filled, seven of them were minority and women individuals.

There was a Service Maintenance goal of one hire, but those positions are no longer in the department, with those positions being contracted out and fulfilled by third-party contracts (contractors are also required to prepare EEO Plans as noted in Attachment 8).

2.2.6 Assessment of Employment Practices

It is the policy of the City of Phoenix to hire the best qualified individual available for the position within the time constraints of the position 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.

Recruitment and Selection

The City of Phoenix conducts recruitments on an ongoing basis, which may run from five days or until filled. Recruitments include job descriptions and application forms, which are placed on the City of Phoenix web page and in the Human Resources employment center. Advertisements are placed in local, state, and national publications, transit industry publications, and minority publications as determined by PTD and submitted by Human Resources (HR). Examples of transit publications are *Transit Intelligence* and *Mass Transit*. Notification of recruitments is provided at job fairs, high schools, vocational, and college career days.

Departments process a position requisition and submit it to Human Resources for a classification to request an existing list of eligible candidates, recruitment for a classification, or a special recruitment, which specifies essential skills for a particular position. Applicants submit applications including résumé or training and experience questionnaires, if required. HR analysts review applications and documents and approve those that qualify. An eligibility list is created and provided to the requesting department(s).

Employment lists consist of five categories, including: recall list, reinstatement list, transfer list, promotional list, and original employment eligible list. Names of eligible individuals may be removed from any employment list by the Personnel Director for any of the reasons stated in the City of Phoenix Personnel Rules. An original employment

list shall consist of the names of applicants who successfully demonstrate that their qualifications are suitable for the class of employment named in their applications. Such lists shall result from competition open to applicants both outside and inside the City service. The names on an employment list shall be listed according to the excellence demonstrated by the applicants, through the qualification measurements used.

The hiring staff will review the employment list and narrow it down to the most qualified individuals. The hiring supervisor then schedules the first interview with approximately 6-12 candidates. A panel of three to five members is appointed, with members representing a diverse gender and ethnic background. Some members will be from the PTD, other City departments, regional transit partners, or from the community. A final interview is conducted with one to three candidates and by the position supervisor, Deputy Director, or Director.

Successful candidates must pass a pre-employment drug test and a fingerprint background check. References are checked and individual HR files are reviewed if the candidate is a current City employee.

Testing

New City employees in specific job categories must pass a pre-employment drug screen prior to beginning employment with the City. See Addendum XX for a listing of specific job categories that require a pre-employment urine drug screen prior to beginning employment with the City. In addition, current City employees who are moved into a position that requires a Commercial Driver's License will be required to pass a pre-employment drug screen and breath alcohol test in compliance with federally mandated guidelines.

Drug testing may also take place for reasonable cause, follow-up, random, post-accident, or other testing as applicable to a particular position or incident.

Seniority Practices

Per the City of Phoenix's Personnel Rule #14, seniority constitutes length of certified status within a class of the City service. When two or more employees have the same length of time in the class, the employee with the longest certified City employment time shall be the senior. If a tie still exists, the appointing authority shall make the determination. Any break in service such as dismissal, resignation, retirement, or status change to part-time, shall cancel all prior seniority credits.

Seniority shall be used in the determination of layoffs. Application of seniority to layoffs shall be according to the provisions of Layoff Rule 16 of these Rules. Rule 7g provides for seniority in reference to promotions. Citywide class seniority shall be used as a factor in choice of work assignments and vacation schedules. The use of seniority in determining the order of vacation of employees shall be by class. In choice of work

assignments within a class, seniority shall determine the choice of assignment when qualifications of employees concerned for kind of assignment are equal in the sound discretion of the department head, except that a department head may rotate employees to provide training and experience in all tasks within a class. Qualifications for an assignment pertain to aptitude, ability, skill, knowledge, physical fitness, interest, enthusiasm, and other pertinent qualifications. Nothing in this Rule shall prevent or hamper the appointing authority in assigning each employee of a class to any assignment within a class for which the employee is best fitted, nor shall the appointing authority be restricted from assigning an employee without a change in pay to another class for brief periods for purposes of training and to meet emergencies.

Training

The City of Phoenix has a competitive employee development program. One element of this program is the Employee Development Fund (EDF) (see A.R. 2.51 – Employee Development Fund Program). The EDF program was created to improve and enhance employee productivity, performance, and professional growth.

The EDF program covers the following professional development opportunities:

- Tuition Reimbursement
- Professional Membership Reimbursement
- Seminar, Workshop, or Conference Reimbursement

All employees in full-time, benefit-eligible positions are eligible for tuition reimbursement. Individuals must be employed by the City at the beginning and conclusion of a tuition-eligible course. Job Share employees may use 50 percent of the annual benefit maximum. Middle Managers' and Executives' tuition is reimbursed through the Management Development Fund as described in AR 2.281.

Employees in fulltime, benefit-eligible positions in the unit categories listed below are eligible for professional membership and seminar/workshop/conference reimbursements. Job Share employees in the unit categories listed below are eligible to use up to 50 percent of their appropriate unit category amount for professional membership and seminar/workshop/conference reimbursements. Unit Categories: - Laborers (Unit 1) - Office and Clerical (Unit 3) - Police Officers (Unit 4) - Police Sergeants and Lieutenants (Unit 6) - Supervisory/Professional (Unit 7) - Confidential Office and Clerical (Unit 8).

Supervisory/Professional employees are entitled to 2 days or 16 hours of annual education leave. This time will be added to the employee's July vacation accrual. Police Supervisory employees are entitled to 1.25 days or 10 hours of annual education leave. For hourly employees, this time will be added to the employee's compensatory time bank at the beginning of the first pay period in July. Exempt Police Supervisory

employees will have this time added to their July vacation accrual. For record keeping purposes, this time will be subject to the restrictions and the authorization requirements of the vacation rule

Compensation and Benefits (Citywide)

All exempt and non-exempt positions are classified according to similarities of responsibilities and qualifications. The purpose of this classification is to cluster similar positions in order to establish a viable career ladder that can maximize promotion opportunities.

If an employee feels that the duties and responsibilities currently being performed are not accurately or completely described by the present position classification, this opinion can be brought to the attention of his/her supervisor. If the supervisor believes that an evaluation of the classification is justified, the supervisor can notify the HR Department, in writing, to request an evaluation be done to potentially upgrade the job classification in which the incumbent is working.

City of Phoenix employees in the Office and Clerical, Confidential Office and Clerical, and Supervisory and Professional units receive merit increases through a nine-step range progression. Merit increases are awarded at six months from step one, and then one year between steps, provided employee performance meets or exceeds job requirements. After completing one year at the top step with six/seven years of continuous service (six years for Office and Clerical and Confidential Office and Clerical, and seven years for Supervisory and Professional) and performance meets or exceeds job requirements, employees receive longevity pay. Longevity is paid semi-annually. Qualifications for longevity pay are made in the base class and will not be affected by movement into or out of assignment positions or positions within the same payrange.

Employees in Middle Management and Executive job units receive pay increases on established minimums and maximums. Pay increases are performance based.

The City of Phoenix provides vacation and sick leave benefits to all its fulltime employees. Some benefits may vary depending on job category. All new employees, regardless of category, must wait six months before using vacation leave. Holiday Pay is for ten holidays a year and applies to all full-time employees.

Sick leave shall accrue for all City of Phoenix employees at 10 hours per month for all job categories. There is unlimited accrual for both hourly and salaried employees.

Other miscellaneous benefits are available for all fulltime employees. The following employee benefits are applicable:

- Health, Vision, and Dental Insurance
- Life Insurance
- Pension Plan
- 401(a), 457, and Post Employment Health Plan accounts
- Deferred Compensation Plan
- Employee Assistance Program
- Flexible Spending Accounts
- Legal Insurance Program
- Long-term Disability
- Career counseling
- Pet Insurance
- Wellness Programs

Disciplinary Procedures and Termination Practices (Citywide)

All employees hired to fill a permanent full-time position serve a probationary period of 12 months. The probationary period is a span of time during which an employee is evaluated by his or her supervisor on the performance of duties in that position. Those qualities, which comprise the overall makeup of the employee, include such areas as attendance, tardiness, reliability, trustworthiness, etc.

If at any time during the probationary period a new employee with no previous work history with the City of Phoenix is performing in an unsatisfactory manner, and has been counseled on these deficiencies and yet does not improve, the employee can be released without recourse. The reasons for separation are submitted to the appropriate manager and placed in the employee's Human Resources file.

Supervisors manage employees with disciplinary problems through progressive discipline. Employees with at least one year as a City of Phoenix employee have the following appeal rights in the event that the supervisor initiates termination action.

Employees have 14 days from the date of notice of proposed termination to request a hearing before a Civil Service Board. If the employee receives notice of termination by certified mail, the deadline to request a hearing is extended to 21 days. The request for hearing must be in writing and must state the specific allegations in the discipline notice with which the employee disagrees.

The appellant shall be entitled to appear personally, produce evidence, and to have counsel and a public or private hearing. The board may appoint a paid hearing officer to conduct the hearing.

The board can order the restoration of the employee to his/her position with or without loss of pay during the period between the filing of the charges and the issuance of the order or uphold or modify the order of suspension, demotion, or dismissal.

Statistical Impact of Employment Practices on Minorities and Women

The impact of employment practices on minorities and women shown on Attachment 4 are reflective of the period since the department grew to over 100 employees (November of 2018) through the submittal of the cities EEO-4 report September 30, 2019. The analysis reveals potential adverse impacts in almost all categories of hires and promotions. PTD identified two factors that contribute to the appearance of adverse impacts: (1) the narrow time period used, and (2) the applicant data represents applicants citywide and cannot be narrowed down to PTD applicants only.

PTD hired employees in three areas: Professional, Protective Services, and Administration Support. Of the four Professional positions filled, three positions were filled by males and one position was filled by a female resulting in potential adverse impacts on females as well as potential adverse impact on White males and females, American Indian/Alaska males, Black males and females, Asian females, and Multi-race males and females. Two Protective Services hires were filled by Hispanic males which shows potential adverse impact on all other categories of applicants. For Administration Support, there were eight hires, split equally between males and females, which identified potential adverse impact on females in general as well as potential adverse impacts on White, Black, and Multiracial persons of both sexes as well as for Hispanic females. Overall, if the data period used represented more than eleven (11) months and if the number of applicants who applied could have been narrowed to only PTD, more accurate results could have been achieved.

PTD promoted eleven employees in three categories: Officials and Administration, Professionals, and Administration Support. There were three promotions in Officials and Administrators: two males and one female, resulting in a potential adverse impact on females as well as almost all other categories of applicants. There were seven (7) promotions in the Professional job category, and the analysis shows a potential adverse impact on females of almost all races, as well as White and Black males. These adverse impacts may be overstated based on the number of applicants portrayed in the analysis (300 male applicants and 1,023 female applicants). Job titles in the Professional job category include Management Assistants, Administrative Assistants, Accountants, Budget Analysts, etc. which are recruited for on a citywide basis. Therefore, the applicant pool demonstrated in the analysis includes applicants for all positions in this category and could not be narrowed down to just applicants who applied for positions within the PTD. There was one promotion in the Administrative

Support job category and 19 applicants. There was a potential adverse impact on all that applied except for the one category that was promoted (Hispanic male).

Training took place in all staff categories, and in the Technicians category there were no adverse impact shown. For Officials and Administrators, the analysis revealed potential adverse impacts for females, White females, Black males and Hispanic males. All potential adverse impacts are the result of new hires who had been in their positions for six months or less and therefore not afforded much time for training to occur. In the Professional job category, the analysis showed a potential adverse impact on males and females that are White, Hispanic, and multi-racial. The Protective Services category identified potential adverse impacts for White and Hispanic males and females. The Administrative Support job category identified potential adverse impacts for White males and Hispanic males and females.

No potential adverse impacts were found for Terminations, and one potential adverse impact was identified in Discipline. Protective Services had a potential adverse impact on White males in one area (Written Reprimand).

Individuals with Disabilities and Veterans

The laws of the State of Arizona require that cities provide preference points for veterans of the Armed Forces of the United States, for the spouse or surviving spouse of certain veterans, and for a person with a disability. These preference points do not apply on promotional examinations.

The analysis of the statistical impact of employment practices for individuals with disabilities showed that there were fifty-one (51) persons with disabilities who applied for jobs and no disabled persons hired. There were 146 applicants that claimed veteran's preferences (90 males and 56 females) and two male veterans were hired. Hiring was done in three categories: Professional, Protective Services, and Administration Support.

Promotions occurred in three areas: Officials and Administration, Professionals and Administration Support. Of the eleven individuals promoted, there were no disabled or veterans hired. A total of sixteen males and five females noted a disability, and a total of 27 males and 64 females noted veteran status.

2.2.7 Monitoring and Reporting

Methods to Monitor the EEO components:

PTD's Federal Compliance Section is responsible for monitoring the EEO program. The Section is overseen by the Transit Compliance Administrator who serves as the EEO Officer and reports directly to the Public Transit Director.

Within the Federal Compliance Section is Oversight and Civil Rights. The Civil Rights team includes an Equal Opportunity Specialist Lead and two Equal Opportunity Specialists who support and report to the Transit Compliance Administrator (EEO Officer). PTD's Director is responsible for the overall EEO program and the EEO Officer ensures the day-to-day management of the program. All PTD executives, management, and supervisory personnel share in the responsibility for implementing and monitoring PTDs EEO Policy and Program within their respective areas.

Methods to monitor the EEO components in this document as follows:

- Dissemination of the EEO policy – monitoring will ensure the policy is disseminated internally and externally as stated in the Plan.
- The Director, EEO Officer and department executives will discuss the utilization analysis, review statistical data on department hiring/firing/retirement, and assess their effects on goals twice per year.
- Twice per year, the Director and EEO Officer will discuss any complaints and barriers that may exist in the hiring process, especially in regards to long term goals. Any specific determinations will be communicated with the PTD'HR representative.

Methods to determine EEO compliance of subrecipients:

To determine EEO compliance of subrecipients and contractors, the EOS(s) will utilize a Review Cycle of every four years as noted in Attachment 8 which lists the name and year of visits and EEO Plan reviews.

Procedures for reviewing union contracts:

The Public Transit Department has employees that may belong to one of two unions or to a collective bargaining unit referred to as the Administrative, Supervisory, Professional, Technical Employee Association (ASPTEA). Public employees have the right to join or participate in, or refuse to join or participate in, the activities of an employee association. The union or bargaining group that employees can participate in are based on job classification, and membership is optional. The two unions and ASPTEA have members in multiple departments (none are solely Public Transit).

Union and collective bargaining agreements are negotiated every two years and are led by the City's Human Resources Department and the City Manager's Office. Both unions and ASPTEA are negotiated separately and have differing benefits and agreements. Each union and ASPTEA have their own representatives for bargaining.

The procedure for review of union contracts follows this process: per the City of Phoenix City Code, Article XVII, Employee Relations, the City Manager or designee(s) serve as the City's representative(s) in the process. The City Manager or designee(s) meet and confer solely with the duly designated representative(s) of authorized employee

organizations, and representative(s) of authorized employee organizations meet and confer solely with the designated representative(s) of the City Manager.

Authorized employee organizations submit their proposed memorandum of understanding in writing to the City Manager and present their proposals to the City Council for approval and public comment. Disagreements between City Council or the employee organization is subject to renegotiation at the request of the City Manager or the authorized employee organization.

When an agreement is reached between the parties, the parties prepare a document containing the terms of the agreement which is submitted to the authorized employee association and City Manager for approval. If either the authorized employee association or City Manager fails to accept any part of the agreement, the entire agreement is subject to rediscussion at the request of the City Manager or the authorized employee association.

After the proposed memorandum of understanding has been approved by the authorized employee organization, it is filed with the City Clerk of the City of Phoenix. At the earliest practicable date thereafter the City Council of the City of Phoenix provide an opportunity for public comment on the terms of the agreements prior to Council action.

[Process and Monitoring of Complaints: \(Citywide A.R. 2.35\)](#)

Supervisors, managers, and executives are required to take proactive steps to prevent discrimination and to take prompt corrective action wherever it occurs. Discrimination can occur in any process or function in achieving or maintaining employment, such as in work assignments, working conditions, job classification, disciplinary actions, promotions, salaries, performance ratings and merit pay increases, interpretations of rules and regulations, or other aspects of employment which affects employees or job applicants unequally.

Policy on Prohibited Discrimination and Harassment

The City of Phoenix will not tolerate discrimination, harassment, or retaliation in the workplace. The City is committed to providing a work environment in which all individuals are treated with respect and dignity. Every individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment and retaliation.

The City of Phoenix will not tolerate discrimination or harassment in the workplace. No employee should be subject to inappropriate verbal or physical conduct because of a protected characteristic or be treated with hostility because of their protected characteristic(s). Conversely, no City employees may engage in discrimination or harassment directed towards another employee because of a protected characteristic. This includes supervisors, managers, and executives who are entrusted with authority to enforce and uphold the policies of the City.

Supervisors, managers, and executives have a duty to act and are required to take appropriate steps to prevent discrimination and harassment and to take prompt corrective action(s). This includes, at a minimum, contacting the Equal Opportunity Department's Compliance and Enforcement Division (EOD) and/or Human Resources (HR) to report allegations of discrimination or harassment.

City employees and job applicants are urged to file complaints promptly, so that issues can be addressed and corrected before the situation deteriorates or escalates. Experience has shown that many problems can be quickly resolved through City administrative channels if addressed early.

The City requires all employees to report conduct that is prohibited by whether or not they are personally involved. Any employee who believes that they have been subjected to prohibited conduct or is aware of others who have been subjected to prohibited conduct, needs to report the behavior immediately to EOD, HR, or any supervisor.

If an employee makes a report of behavior prohibited by the City, to a supervisor, manager, or executive, that report must immediately be forwarded to EOD or HR. This requirement applies even if the employee has requested that the report be held in confidence, expressed that they do not want the matter to be investigated, or made any other statements that indicate or imply that they do not want the matter to be handled by EOD or HR.

Supervisors, managers, and executives are required to monitor their respective workplaces and immediately intervene if they believe inappropriate behavior has occurred or is occurring. Any inappropriate behavior that may be perceived as prohibited must be reported to EOD or HR immediately.

For current employees, if there is uncertainty as to whether a situation violates any rights, the concerned individual is encouraged to discuss the matter with HR staff or EOD before determining whether to file a complaint.

Applicants for employment who believe they have been subject to conduct that violates their rights should file their complaints or discuss their concerns with EOD staff.

Where to Make a Report

Any employee who believes that they have been subjected to Prohibited conduct should report it to any supervisor, department management, Human Resources staff, City management, or to EOD at (602) 262-7486 (voice) or use Relay 7-1-1 (TTY). Complaints may also be made in person during normal business hours at EOD's offices, which are located at 200 West Washington Street, 15th Floor. Complaints may also be made at any time via EOD's intranet site at (<http://insidephx/depts/eod/employee-discrimination-complaint-form>).

Applicants for employment should file their complaints or discuss their concerns directly with EOD.

How to Make a Report

Employees should provide a complaint, preferably in writing and as soon as possible following the incident, to any of the following City staff:

- Supervisor or another person in their chain of command,
- Human Resources Staff,
- Professional Standards Bureau,
- Equal Opportunity Department,
- Human Resources Department,
- City Manager's Office, or
- Integrity Line.

Monitoring of Complaints

Prior to the start of an investigation, EOD staff should meet with the appropriate HR staff to determine how to address any alleged violations of this A.R. HR staff may take the lead and investigate the allegation(s) in consultation with EOD staff; EOD staff and HR staff may jointly investigate the allegation(s); or EOD staff may take the lead and investigate the allegation(s) in partnership with HR staff.

Once EOD or HR has completed their investigation Notice of the conclusion of the investigation will be given to the parties of the complaint, the appropriate Deputy City Manager, Law Department, the department or function head, and the Human Resources staff.

Agency Reporting

The Public Transit Department follows FTA requirements of communicating and monitoring the EEO program.

The Director and EEO Officer will discuss the progress of the EEO Program and the results of outreach, hiring, promotions, and the status of EEO complaints semi-annually. Ongoing issues will be followed up on accordingly.

The EEO Officer and management will meet semi-annually to discuss topics of concern or to update staff on topics. The topics covered will be listed in the meeting summary and the EEO Officer will work with staff for any follow-up actions necessary for open communications with the entire management staff.

The EEO Officer and department HR representative will meet with staff who plan to be hiring in the upcoming six months at least semi-annually to review current EEO goals and statistics on employment practices and policies. This will ensure that job descriptions contain the necessary descriptions, that any testing or educational requirements are understood, and that staff who will be hiring are aware of the status of the department EEO goals.

Attachments

- Attachment 1: Utilization analysis of the current workforce
- Attachment 2: All Job Titles
- Attachment 3: 2014 through 2018 Short-Term and Long-Term Goals
- Attachment 4: Employment Practices Chart
- Attachment 5: List of subrecipients and contractors who are being monitored and the services they provide
- Attachment 6: Proof of review of subrecipients and contractors' EEO Program
- Attachment 7: Public Transit EEO Chart
- Attachment 8: Subrecipient Monitoring Schedule for Equal Employment Opportunity Plans

Utilization Analysis by Job Category

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V
1	Job Category	Salary Range (\$XX,000-XX,000)	Total Workforce					Male							Female							
2	Use EEO-4		All	WM	MM	WF	MF	W	AI/AN	B	H/L	A	NHOPI	Multi	W	AI/AN	B	H/L	A	NHOPI	Multi	
73	6 - Administrative Support																					
74	Current Workforce	\$29,000 to \$56,000	25	2	6	4	13	2	-	-	6	-	-	-	4		2	11		-	-	<--Entry
75	Percent in Category	^Entry		8.0%	24.0%	16.0%	52.0%	8.0%	0.0%	0.0%	24.0%	0.0%	0.0%	0.0%	16.0%	0.0%	8.0%	44.0%	0.0%	0.0%	0.0%	
76	Percent of Availability							17.3%	0.4%	1.8%	5.2%	0.6%	0.1%	0.5%	52.9%	1.3%	2.7%	15.0%	1.2%	0.1%	1.1%	<--Entry
79	Percent Underutilized														37%							
80	Underutilized (Yes/No)								No	No	No	No	No	No	Yes	No	No	No	No	No	No	
81	Number Needed to Reach Parity								-	-	-	-	-	-	9	-	-	-	-	-	-	
82	Planned percent increase Year 1																					<--Entry
83	Planned percent increase Year 2																					<--Entry
84	Planned percent increase Year 3																					<--Entry
85	Planned percent increase Year 4																					<--Entry
86																						
87	7 - Skilled Craft																					
88	Current Workforce	^Entry	0	0	0	0	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	<--Entry
89	Percent in Category	^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%	
90	Percent of Availability																					<--Entry
93	Percent Underutilized																					
94	Underutilized (Yes/No)								No	No	No	No	No	No	No	No	No	No	No	No	No	
95	Number Needed to Reach Parity								-	-	-	-	-	-	-	-	-	-	-	-	-	
96	Planned percent increase Year 1																					<--Entry
97	Planned percent increase Year 2																					<--Entry
98	Planned percent increase Year 3																					<--Entry
99	Planned percent increase Year 4																					<--Entry
100																						
101	8 - Service-Maintenance																					
102	Current Workforce	^Entry	0	0	0	0	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	<--Entry
103	Percent in Category	^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%	
104	Percent of Availability																					<--Entry
107	Percent Underutilized																					
108	Underutilized (Yes/No)								No	No	No	No	No	No	No	No	No	No	No	No	No	
109	Number Needed to Reach Parity								-	-	-	-	-	-	-	-	-	-	-	-	-	
110	Planned percent increase Year 1																					<--Entry
111	Planned percent increase Year 2																					<--Entry
112	Planned percent increase Year 3																					<--Entry
113	Planned percent increase Year 4																					<--Entry
114																						
115	Notes:																					
116																						
117																						
118																						

Attachment 2

All Job Titles:

Account Clerk III
Accountant III
Admin Aide*U7
Administration Assistant I
Administration Assistant II
Assistant to the City Manager (NC)
Budget Analyst II
Chief Engineering Tech*U7
Clerical Supervisor
Contracts Specialist I
Customer Service Clerk
Deputy Public Transit Director
Economic Development Pro. Manager
Equal Opportunity Specialist
Equipment Analyst
Facilities Service Coordinator
Facility Contract Compliance Specialist
Lead

Facility Contract Compliance Specialist
Info Tech Analyst/Program II
Info Tech Analyst/Program III

Info Tech Project Manager
Lead Info Tech Systems Spec
Management Assistant I
Management Assistant II
Municipal Security Guard
Plan Review Coordinator
Planner II
Planner III
Principal Engineering Tech
Principal Planner
Public Information Specialist
Public Transit Director (NC)
Quality Assurance Engineer
Senior Info Tech Systems Spec
Senior User Technology Spec
Special Projects Administrator

Supplies Clerk I*U3
Transit Field Operations Manager
Transit Operations Contract Supervisor
Transit Superintendent
User Technology Specialist

Attachment 3

2014 through 2018 Short-Term and Long-Term Goals

Job Categories	Positions	Forecasted Vacancies	Short Term Goal	Long-Term Goal	Area Lacking (Minority/Female)
Professionals	Various	21 positions	Increase 46%	Increase 49%	Minority and female
Protective Service Non-Sworn	Various	13 positions	Increase 47%	57%	Minority and female
Service Maintenance	Maintenance	1 position	Increase 25%	N/A	Female
Officials & Administrators	Administrator	1 position	N/A	Increase 50%	Female
Office and Clerical	Clerical	1 position	N/A	64%	Minority female

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

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

Notes:

	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
Persons with Disabilities																
Number Applied	25	26	10	8	1	-	6	2	6	11	-	1	-	-	2	4
Total Hires	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	0.0%	0.0%	0.0%	0.0%	N/A	N/A	0.0%	0.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	0.0%	0.0%
	Total		W		AI/AN		B		H/L		A		NHOPI		M	
Veterans	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Number Applied	90	56	33	14	5	2	9	10	34	20	-	-	1	-	8	10
Total Hires	4	-	-	-	-	-	-	-	4	-	-	-	-	-	-	-
Selection Rate	4.4%	0.0%	0.0%	0.0%	0.0%	N/A	0.0%	0.0%	11.8%	0.0%	N/A	N/A	N/A	N/A	0.0%	0.0%

Notes:

Four-Fifths Adverse Impact Analysis by Job Category Promotions

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

Notes: Due to the short period that this covers (public transit reached 100 employees November 2018 and the EEO 4 runs through Sept 2019) the overall number of promotions is not that large. When a 4-year window is researched in the future some of the areas should less impact due to the longer time period.

Persons with Disabilities	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Number Applied	16	5	8	2	1	-	2	1	3	1	-	-	-	-	2	1
Total Promotions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	0.0%	0.0%	0.0%	0.0%	0.0%	N/A	0.0%	0.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	0.0%	0.0%

Veterans	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Number Applied	27	64	5	10	-	-	10	10	5	37	5	3	-	-	2	4
Total Promotions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	0.0%	0.0%	0.0%	0.0%	N/A	N/A	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	N/A	N/A	0.0%	0.0%

Notes: Disabled self disclosed. Veterans all with service shown. Public Transit Department rose to 100 employees as of November 2018 so this data is based on November 2018 to September 30, 2019 .

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

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

Notes: Public Transit Department rose to 100 employees as of November 2018 so this data is based on November 2018 to September 30, 2019 . For Female Admin started in June 2019 and so this only reflects 4 months of new job.

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

Job Category (Use EEO-4)	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
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

Notes: Public Transit Department rose to 100 employees as of November 2018 so this data is based on November 2018 to September 30, 2019 . Only Involuntary Terminations are included

Attachment 5

List of subrecipients and contractors who are being monitored and the services they provide

Subrecipient or Contractor	Service
First Transit	Transit provider (contractor)
MV Transportation	Transit provider (contractor)
City of Mesa	Subrecipient for public transit
Transdev	Transit provider (contractor)
Total Transit/Total Ride	Transit provider (contractor)
Valley Metro (RPTA and Valley Metro Rail)	Subrecipient for public transit



City of Phoenix
PUBLIC TRANSIT DEPARTMENT

December 7, 2018

Brandy S. Gaskin
MVTransportation, Inc.
2711 N Haskell Ave
Suite 1500
Dallas, TX 75204

Dear MsGasken:

The City of Phoenix Public Transit Department has received and reviewed MV Transportation, Inc.'s Equal Employment Opportunity Plan submitted on August 7, 2018. This EEO program will be effective July 2018 to June 2021.

The Federal Transit Administration (FTA) requires recipients of federal funds to demonstrate compliance with Equal Employment Opportunity through regular compliance reports. The Federal Transit Laws, 49 U.S.C. 5332(b), provide that "no person in the United States shall on the grounds of race, color, religion, national origin, sex, or age be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any project, program or activity funded in whole or in part through financial assistance under this Act."

The (FTA) Circular 4704.1A, "Equal Employment Opportunity (EEO) Requirements and Guidelines for Federal Transit Administration Recipients" sets forth the information that should be included in these plans, and requires they be submitted as EEO Programs every four years. Please note that at your request the current plan is for three years and once you update it in 2021 you will then switch to updating every four years.

The Public Transit Department's review of your EEO program considered all elements required by FTA's regulations found at 49 U.S.C. 5332(b) as outlined in Circular 4704.1A. The city review results emailed to you in November and a follow-up on December 3rd identified the specific areas reviewed, any concerns, and relevant reviewer comments. MV Transportation promptly addressed and corrected the concerns.

We concur with your current EEO Plan. You must continue to properly implement your program to ensure nondiscriminatory hiring and employment practices.

The plan is good for three years, but the City will request a confirmation each July to ensure no EEO plan changes or transit provider changes took place

during the past year. A reason to notify us outside of this window would include changes in the staff persons listed on the EEO Statement of Policy or changes to the plan itself. If you need technical assistance or have any questions, please reach out to me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Renee L. Standing tree". The signature is fluid and cursive, with the first name "Renee" being the most prominent.

Renee L. Standing tree
Equal Opportunity Specialist

cc Gabriel Peiz
Nate Peterson



City of Phoenix
PUBLIC TRANSIT DEPARTMENT

September 20, 2018

Penny Lynch
101 N. 1st Avenue, Suite 1400
Phoenix, AZ 85003

Dear Ms. Lynch

The City of Phoenix Public Transit Department has received and reviewed Valley Metro's Equal Employment Opportunity Plan submitted on May 11, 2018. This Equal Employment Opportunity (EEO) program plan will be effective May 2018 through May 2022.

The Federal Transit Administration (FTA) requires recipients of federal funds to demonstrate compliance with EEO through preparation and use of an EEO Plan. The Federal Transit Laws, 49 U.S.C. 5332(b), provide that "no person in the United States shall on the grounds of race, color, religion, national origin, sex, or age be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any project, program or activity funded in whole or in part through financial assistance under this Act."

The (FTA) Circular 4704.1A, "Equal Employment Opportunity (EEO) Requirements and Guidelines for Federal Transit Administration Recipients" sets forth the information that should be included in these plans, and requires they be submitted as EEO Programs every four years.

The Public Transit Department's review of your EEO program considered all elements required by FTA's regulations found at 49 U.S.C. 5332(b) as outlined in Circular 4704.1A. The city review results were emailed to you on August 6, 2018 identified the specific areas reviewed, any concerns, and relevant reviewer comments. Valley Metro promptly addressed and corrected the concerns any concerns.

We concur with your current EEO Plan. You must continue to properly implement your program to ensure nondiscriminatory hiring and employment practices.

The plan is good for four years, but the City will request a confirmation each May to ensure there are no EEO plan changes. A reason to notify us would include changes in the staff persons listed on the EEO Statement of Policy or changes to the plan itself. For the transit contractors that are subject to FTA requirements

we will verify that the list of contractor EEO Plans has been updated. If you need technical assistance or have any questions, please reach out to me.

Sincerely,



Renee L. Standing tree
Equal Opportunity Specialist

cc Joe Bowar
Christina Hernandez
Mike Taylor
Michelle Valdez
Scott Wisner



City of Phoenix
PUBLIC TRANSIT DEPARTMENT

December 3, 2018

Jodi Sorrell
City of Mesa,
300 E 6th St, Mesa, AZ 85201

Dear Ms. Sorrell:

The City of Phoenix Public Transit Department has received and reviewed City of Mesa's Equal Employment Opportunity Abbreviated Plan submitted on June 29, and updated with a final draft on November 11. This EEO program will be effective September 1, 2018 to August 31, 2022.

The Federal Transit Administration (FTA) requires recipients of federal funds to demonstrate compliance with Equal Employment Opportunity through regular compliance reports. The Federal Transit Laws, 49 U.S.C. 5332(b), provide that "no person in the United States shall on the grounds of race, color, religion, national origin, sex, or age be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any project, program or activity funded in whole or in part through financial assistance under this Act."

The (FTA) Circular 4704.1A, "Equal Employment Opportunity (EEO) Requirements and Guidelines for Federal Transit Administration Recipients" sets forth the information that should be included in these plans, and requires they be submitted as EEO Programs every four years, but since The City of Mesa has an abbreviated plan this is not a requirement for your agency at this time.

The Public Transit Department's review of your EEO program considered all elements required by FTA's regulations found at 49 U.S.C. 5332(b) as outlined in Circular 4704.1A. The city review results were emailed to you on after our onsite interview on September 25th and the City of Mesa promptly addressed and corrected the concerns.

We concur with City of Mesa's EEO Abbreviated Plan. You must continue to properly implement your program to ensure nondiscriminatory hiring and employment practices.

The plan is good for four years, but the City will request a confirmation each year to ensure no EEO plan changes or transit provider changes took place. A reason to notify us would include changes in the staff persons listed on the EEO Statement of Policy or major changes to the plan itself. If you need technical assistance or have any questions, please reach out to me.

Sincerely,

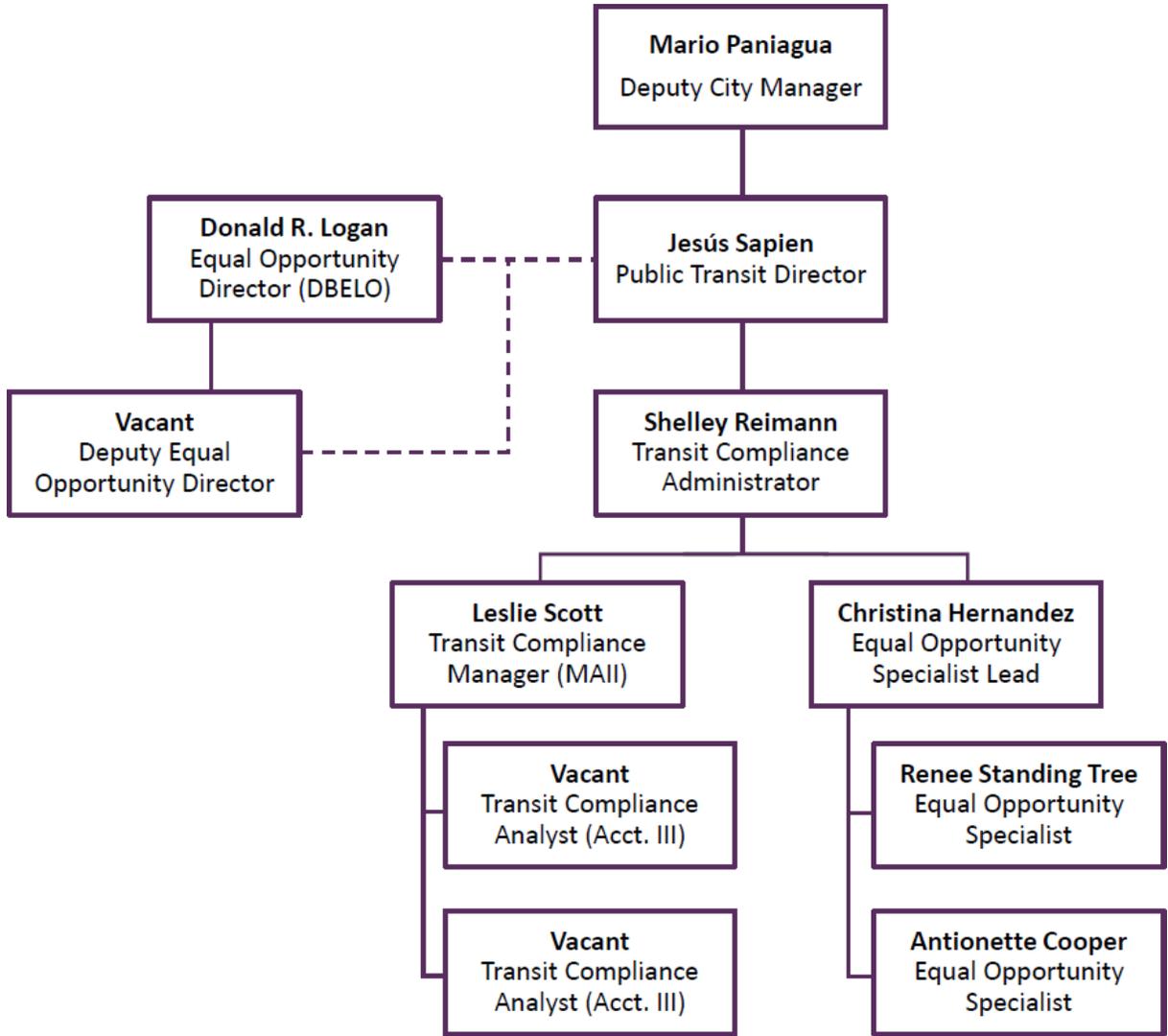
A handwritten signature in blue ink, appearing to read "Renee L. Standing tree". The signature is fluid and cursive, with a long horizontal stroke extending to the left.

Renee L. Standing tree
Equal Opportunity Specialist

Cc: Christina Hernandez

Attachment 7

Public Transit EEO Chart



Attachment 8: Monitoring Schedule



City of Phoenix

PUBLIC TRANSIT DEPARTMENT

Subrecipient Monitoring Schedule for Equal Employment Opportunity Plans

All Equal Employment Opportunity (EEO) plans are reviewed every four years. The following describes the monitoring schedule for all City of Phoenix federally funded recipients:

FTA Circular 4704.1A

Review Cycle -- EEO Plan Due	
Request Subrecipient Updates in non-EEO Plan years	Once Annually, one month prior to renewal month
Subrecipient EEO Plan Draft Due	90 days prior to expiration date
Comments provided to recipients from City of Phoenix	Within 30 days
Subrecipients provide final plan with CEO/GM signature on EEO Statement	Varies depending on plan expiration
City of Phoenix to complete concurrence and plan review assessment	Within 30 days after final submission

Review Cycle -- Non-EEO Plan year	
Annual EEO reporting for updates from Subrecipient in non-EEO Plan years	Once Annually, one month prior to renewal month (varies depending on plan due dates)

Cycle 1: January 2021 – December 2021			
	Subrecipient	Plan Expires	Agency Type
1.	Total Transit/Total Ride	January 2021	Private Agency (Contractor)

Cycle 2: January 2022 – December 2022			
2.	MV Transportation	July 2022	Private Agency/Contractor
3.	Transdev	January 2022	Private Agency/Contractor
4.	Valley Metro	May 2022	Regional public transportation /Federal
5.	City of Mesa	September 2022	Subrecipient for public transportation

Cycle 3: January 2023 – December 2023			
5.	First Transit	2023	Private Agency/Contractor

Cycle 4: January 2024 – December 2024			
6.	City of Phoenix, Public Transportation Department	Month (spring) of 2024	City public transportation/Federal