

# GREATER NEW HAVEN TRANSIT DISTRICT



## EQUAL EMPLOYMENT OPPORTUNITY (EEO)/ PROGRAM PLAN

EFFECTIVE February 1, 2020

**Greater New Haven Transit District  
Equal Employment Opportunity (EEO) Program Plan**



**Submitted March 1, 2020**

**This document has been prepared in accordance  
with the Equal Employment Opportunity requirements  
set forth in FTA Circular 4704.1A.**

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# TABLE OF CONTENTS

---

<b>Introduction</b>	<b>Page 4</b>
<b>Policy Statement</b>	<b>Page 6</b>
<b>EEO Commitment</b>	<b>Page 7</b>
<b>EEO Complaint Procedure</b>	<b>Page 8</b>
<b>Responsibility of EEO Officer</b>	<b>Page 10</b>
<b>Designation of Responsibility</b>	<b>Page 11</b>
<b>Internal and External Dissemination</b>	<b>Page 12</b>
<b>Utilization Analysis</b>	<b>Page 13</b>
<b>Goals and Timetables</b>	<b>Page 18</b>
<b>Assessment of Employment Practices</b>	<b>Page 19</b>
<b>Monitoring and Reporting System</b>	<b>Page 20</b>
<b>Recruiting and Applicant Tracking</b>	<b>Page 20</b>
<b>Appendix</b>	
<b>Goals and Timetables</b>	

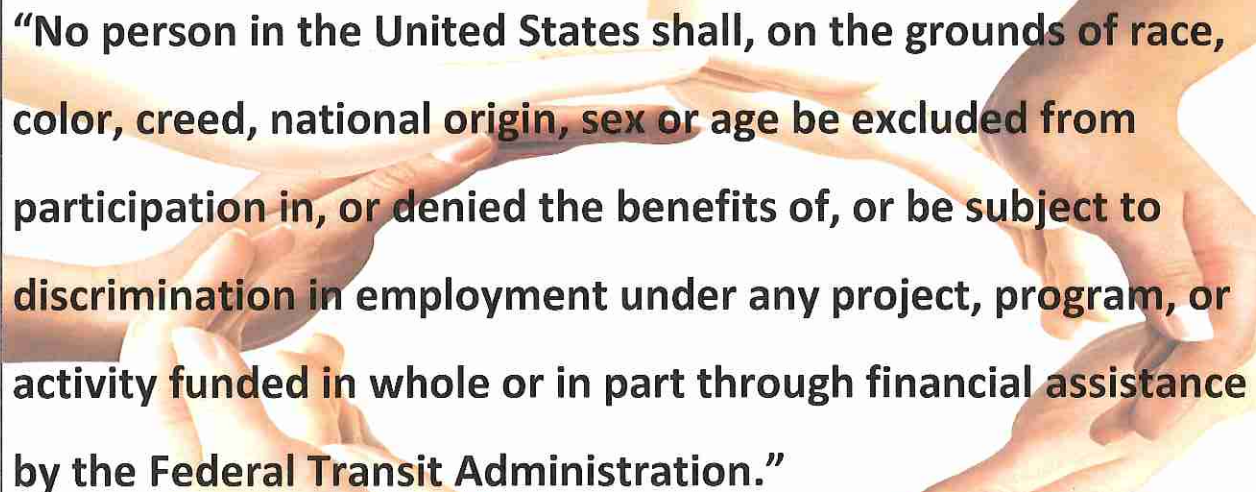
# INTRODUCTION

## GNHTD'S Commitment to Civil Rights

This document details Greater New Haven Transit District's (GNHTD) program to ensure compliance with federal and state requirements related to the provision of Equal Employment Opportunities (EEO).

It includes:

- GNHTD's Equal Employment Opportunity policy statement.
- Details of the programs that GNHTD has undertaken to ensure equal employment opportunities including the commitment of qualified staff, and:
- An analysis of the impact of efforts detailing the extent to which GNHTD is reaching its employment goals.



**“No person in the United States shall, on the grounds of race, color, creed, national origin, sex or age be excluded from participation in, or denied the benefits of, or be subject to discrimination in employment under any project, program, or activity funded in whole or in part through financial assistance by the Federal Transit Administration.”**

**-Section 19 of the Urban Mass Transit Act of 1964**



# Statement of GNHTD's Equal Employment Opportunity Policy and its Key Principles

As a matter of principle, GNHTD will not discriminate against any employee or applicant for employment because of race, color, creed, national origin, gender or age. GNHTD will not discriminate against individuals with disabilities in accordance with the requirements of Section 504 of the Rehabilitation Act of 1973, as amended, the Americans with Disabilities Act of 1990, as amended. Further, GNHTD will not discriminate because of age in accordance with the Age Discrimination Act and the applicable provisions of State law. Under applicable regulations, GNHTD provides reasonable accommodations to qualified individuals with disabilities.

It is also the policy of GNHTD to provide equal employment opportunity at every level without regard to race, color, sex, national origin, ancestry, religion, marital status, sexual orientation, physical disability, or age. This policy applies to all phases of employment and economic opportunity, including the processes of recruitment, selection, promotion, termination, layoff, compensation, training and benefits. In support of this policy, GNHTD ensures:

**Commitment to Equal Employment Opportunity** – No person will be discriminated against or denied the benefits of any activity, program or employment process in the areas of recruitment, selection, promotion, termination, layoffs, compensation, training or benefits.

**Commitment to Affirmative Action** – GNHTD policies afford equal opportunity for employment to all qualified persons without regard to race, color, religion, age, sex, marital status, national origin or ancestry, sexual orientation or disability. GNHTD will implement, monitor, enforce and achieve full compliance with its Affirmative Action Policy Statement and with applicable federal and state laws, regulations and executive orders.

**Responsibility for Implementation** – Every employee has a responsibility to ensure success of the EEO policy. Responsibility for implementation of the policy resides with GNHTD's EEO Officer.

**Responsibility of Management Personnel** – Managers and Supervisors are responsible for a) fostering an atmosphere which is free of discrimination and harassment and b) conducting their individual activities in a manner which values the rights of co-workers.

**Right of Employees to File Complaints** – GNHTD is committed to make it uncomplicated for an employee to file an EEO complaint and has included the complaint process in this plan.

**Performance of Management Relative to Success of the Program** – Managers and supervisors are advised of their responsibilities to ensure the success of the Program and are evaluated on the success of the EEO program in the same manner as their performance on other goals.

**Successful Achievement of EEO Goals** – GNHTD recognizes that the successful achievement of its goals with respect to equal employment opportunity, benefits the agency through encouraging success in all employees.

# ABOUT US

The Greater New Haven Transit District (GNHTD) is a municipal corporation established in 1973 under the provisions of Connecticut Public Act 261, Chapter 103(a) for the purpose of operating and providing a variety of transportation programs and services. It is one of eleven regional transit districts in the State of Connecticut.

The GNHTD provides direct transportation services. It also provides collaborative Dial-a-Ride service to municipalities in the greater New Haven region.

Some of these programs are mandated by the Americans with Disabilities Act (ADA) and are supported with funds from the Federal Transit Administration (FTA) of the United States Department of Transportation, the Connecticut Department of Transportation, municipalities' community dues and fares paid by program users.

The GNHTD encourages all individuals eligible for ADA certification or for Dial-a-Ride to apply for and use the Program to meet their local transportation needs.

## **Governing Bodies**

The Board of Directors is composed of representatives of member municipalities appointed by their Chief Elected Official and approved by the Legislative bodies of each municipality. Each Board Member has a vote proportional to the population of his/her member community. The Board of Directors has policy-making authority and convenes (4) times a year.

The Board of Directors has delegated program administration to an Executive Committee consisting of seven (7) Board members elected by the Board of Directors as prescribed by the By-Laws of the GNHTD. The Executive Committee meets quarterly and has administrative control of all phases of program operations.

# EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT

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

Greater New Haven Transit District 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.

GNHTD is committed to providing reasonable accommodations to applicants and employees who need them because of a disability or to practice or observe their religion, absent undue hardship.

As GNHTD's Interim Executive Director, I maintain overall responsibility and accountability for GNHTD's compliance with its EEO Policy and Program. To ensure day-to-day management, including program preparation, monitoring, and complaint investigation, I have appointed Glen McGough, Chief Administrative Officer as GNHTD's EEO Officer. Glen McGough will report directly to me and acts with my authority with all levels of management, labor unions, and employees.

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

Greater New Haven Transit District 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.

  
Mario Marrero, Interim Executive Director

2/27/2020  
Date

## EQUAL EMPLOYMENT OPPORTUNITY COMMITMENT

This plan details Greater New Haven Transit District's commitment to ensure compliance with federal and state requirements related to the provision of Equal Employment Opportunities. GNHTD is committed not to discriminate against individuals with disabilities in accordance with the requirements of Section 504 of the Rehabilitation Act of 1973, as amended, the Americans with Disabilities Act of 1990, as amended.

Commitment to Equal Employment Opportunity – no person will be discriminated against or denied the benefits of any activity, program or employment process in the areas of recruitment, selection, promotion, termination, layoffs, compensation, training or benefits.

Commitment to Affirmative Action – The policies at GNHTD afford equal opportunity to all qualified persons without regard to race, color, religion, age, sex, marital status, national origin

or ancestry, sexual orientation or disability. GNHTD will implement, monitor, enforce and achieve full compliance with its Affirmative Action Policy Statement and with applicable federal and state laws, regulations and executive orders.

**Responsibility for Implementation** – Every employee has a responsibility to ensure success of the EEO Policy. Responsibility for implementation of the policy resides with GNHTD’s EEO Officer.

**Responsibility of Management Personnel** – Managers and Supervisors are responsible for fostering an atmosphere which is free of discrimination, harassment and conducting their individual activities in a manner which values the rights of coworkers.

**Right of Employees to File Complaints** – GNHTD is committed to make it effortless for an employee to file an EEO complaint and has included a complaint process in this plan.

**Management Responsibilities to Ensure Program Success** – Managers and Supervisors are advised of their responsibilities to ensure the success of the EEO Program and are evaluated on the success of the EEO Program in the same manner as their performance on other goals and responsibilities.

**Successful Achievement of EEO Goals** – GNHTD recognizes that the successful achievement of its goals with respect to Equal Employment Opportunity benefits the District through encouraging success in all employees.

## EQUAL EMPLOYMENT OPPORTUNITY COMPLAINT PROCEDURE

### **EEO Complaint Procedures**

GNHTD has adopted procedures detailed below for investigating and monitoring EEO complaints, which are reported to the Federal Transit Administration triennially. Although it is recommended that EEO complaints be filed first with GNHTD, the complainant may file with the noted agencies.

Any person who believes that she or he, individually or as a member of any specific class of persons, has been subjected to discrimination in employment on the basis of race, color, creed, national origin, sex, sexual orientation, age, or disability may file a written complaint with any of the following:

- o Greater New Haven Transit District
- o The Federal Transit Administration Office of Civil Rights
- o The Connecticut Department of Transportation Office of Civil Rights
- o Commission on Human Rights and Opportunities (CHRO) or
- o The Equal Employment Opportunity Commission (EEOC)

GNHTD will investigate and resolve such complaints at the lowest level possible. The process and procedures discussed below do not prohibit a complainant from filing a formal complaint with other state and federal agencies.

Retaliation against an individual who files a charge or complaint of discrimination or participates in an employment discrimination proceeding is strictly prohibited and will not be tolerated.



## **Filing a Complaint**

An EEO complaint must be filed no later than ten (10) days from the date the alleged discrimination occurred. This time limit will not apply to complaints of alleged unlawful practices of a continuous nature. Complainants must submit EEO complaints in writing by contacting GNHTD's EEO Officer.

Each complaint must include:

- o Name, address and contact of the complainant
- o Name of the person or department against which the charge is being made
- o A statement of facts contributing to the alleged discrimination including the date(s) of such act(s)
- o A statement as to the basis for the alleged discrimination, and
- o Name(s) of any witnesses to the alleged discrimination.

Complaints should be submitted to:

Human Resources Manager/EEO Officer  
Greater New Haven Transit District  
840 Sherman Avenue  
Hamden, CT 06514

## **When Additional Information is Needed**

When a complaint is incomplete and additional information is needed during the investigation process, GNHTD's EEO Officer will contact the complainant to request the additional information. The complainant will have ten (10) business days to submit the requested information. Failure to provide the requested information by the required date may result in administrative closure of the complaint.

## **Assistance in Filing a Complaint**

In cases where a complainant is unable to provide a written statement, a verbal complaint of discrimination may be made to the EEO Officer by telephone or in-person.

## **Investigation of EEO Complaints**

All EEO complaints alleging discrimination are recorded and entered in GNHTD's EEO complaint file upon receipt. All complaints are investigated promptly and reasonable measures are taken to preserve any information that is confidential.

Typically, within ten (10) business days of receiving the complaint, the EEO Officer will provide written acknowledgement of the complaint.

The EEO Officer will meet with the complainant to review the allegations outlined in the charge to ensure that the allegations are accurately stated and fully understood. The goal of this meeting is to ensure that the complaint is clearly defined.

## **Interview of Department Leader and/or Individual Charged**

Within ten (10) days from receipt of the complaint form, the EEO officer will notify the proper department leader and/or individual that a complaint of alleged discrimination has been filed and arrange an interview. During the interview with the department leader and/or individual, the EEO Officer will describe the nature of the complaint, the identity of the charging party and the events and facts which led to the complaint. The department leader will make available all personnel records, memoranda, data or any other evidence requested. Copies of confidential information will not be made a part of the written findings.

## EEO Officer's Findings

The EEO Officer will examine all fact-finding information collected. A written report will be prepared within (30) days following receipt of the complaint. The report will include:

- o A summary of the charge(s);
- o A summary of the complaint describing the nature of the alleged discriminatory activity stated by the complainant;
- o A summary of the response by the department leader and/or person being charged with alleged discriminatory action;
- o A summary of the investigation by the EEO Officer including any background on the conditions of complaint, persons involved, written statements, data or any other exhibits;
- o The conclusion(s) determined by the EEO Officer; and
- o Recommendation of action(s), if any.

This written report will be given to GNHTD's Executive Director for a final determination and resolution of the complaint. Upon the completion of the evaluation, and no later than the (10) days following receipt of the report, copies of the final report will be submitted to:

- o The complainant
- o Department leader and/or individual involved

If the Complainant wishes to appeal the decision, he or she may do so in writing to the Executive Director within ten (10) days of the final determination.

GNHTD will maintain a list of active investigations conducted by any entity, including lawsuits or complaints which name GNHTD alleging discrimination on the basis of race, color, creed, national origin, sex, age, or disability. The list will include the date of the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response to the investigation, lawsuit, or complaint.

## EEO Complaint Process

<b>1</b>	<b>EEO Complaint</b>	<b>Complaint filed with EEO Officer within 10 days of alleged incident</b>
<b>2</b>	<b>Initial Review</b>	<b>Additional information requested from the complainant if necessary. Generally within the first 10 days of filing.</b>
<b>3</b>	<b>Investigation</b>	<b>Investigation conducted, with department leader and other appropriate staff. Generally within the first 10 days of filing.</b>



<b>4</b>	<b>EEO Report</b>	<b>Draft of EEO Officer investigation report prepared within 30 days of complaint.</b>
<b>5</b>	<b>CEO Review</b>	<b>Executive Director review and final decision within 10 days.</b>
<b>6</b>	<b>Appeal</b>	<b>Appeal to Executive Director within 10 days, if requested.</b>

# RESPONSIBILITY OF EEO OFFICER

Under the supervision of the District’s Executive Director, the EEO Officer is responsible for publicizing and distributing the agency’s EEO Policy internally to managers and supervisors via written communication from CEO; inclusion of the policy in the personnel and operations manual; meetings held with managers and supervisors; and to non-supervisory staff via EEO Policy posters; EEO Policy statement on bulletins boards; near time clocks, cafeteria, employment/human resources office; policy inclusion in employee handbooks, reports, manuals, union contracts; meeting with minority and female employees for training programs; and externally to regular recruitment sources, e.g., employment agencies; unions, educational institutions, minority and women’s organizations, civil rights organizations and any agency that refers applicants; public media sources; radio, television stations, newspapers, magazines and journals.

Exercise leadership in establishing, maintaining and carrying out positive and continuing programs of Affirmative Action designed to promote Equal Employment opportunities within the Greater New Haven Transit District. Disseminate directives to managers and supervisors in order to assure compliance with the EEO/Affirmative Action Plan.

## **Illustrative Examples of Duties**

- o Develop Equal Employment Opportunity policy, a written program.
- o Concur in all hires and promotions.
- o Process all employment discrimination complaints.
- o Assist management in collecting and analyzing employment data, identify problem area and setting goals.
- o Assist in identifying areas needing improvement.
- o Involvement in local minority organizations.
- o Participate in review of complaints alleging discrimination.
- o Support career counseling for employees.



# DESIGNATION OF RESPONSIBILITY

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## **GNHTD's EEO Officer**

The Chief Administration Officer is the Affirmative Action/Equal Employment Officer of the Greater New Haven Transit.

The EEO Officer will disseminate appropriate directives to managers and supervisors in order to assure compliance with the EEO Plan.

The EEO Officer will assist in the identification of problem areas and establish departmental goals and objectives.

The EEO Officer will participate actively in periodic audits of all aspects of employment to identify and remove barriers obstructing the achievement of specified goals and objectives.

The EEO Officer will maintain and update the personnel database for generating reports required for the program.

The EEO Officer will encourage employee participation to support the advancement of the EEO Program (e.g. professional development and career growth opportunities, posting promotional opportunities, shadowing, mentoring).

# INTERNAL AND EXTERNAL DISSEMINATION

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## **Dissemination of GNHTD's EEP Policy/Program**

GNHTD shares its EEO Policy and Plan with its employees in the following ways:

### **Internal Dissemination**

- o Public Postings - GNHTD communicates its policy statement on their website, its vehicles, and in common areas of its agency;
- o Review of Employment Procedures – Periodically, GNHTD's Management team will review employment procedures with the Executive Director;
- o Non-Supervisory Staff – Management informs non-supervisory staff of GNHTD's EEO Policy through displaying highly visible posters regarding equal employment opportunities in common areas of GNHTD facilities; and
- o New Employees – All new employees are presented with and sign GNHTD's current EEO statement during orientation.

### **External Dissemination**

GNHTD also communicates its EEO policy externally as follows:

- o GNHTD's EEO Officer ensures that all of GNHTD's recruiting sources are informed verbally and in writing of the agency's EEO policy.

- o The following organizations will be informed of employment opportunities as they become available: employment agencies, educational institutions, organizations representing persons with disabilities, veterans, women and minorities; and community action agencies
  - The Human Resources representative will attend appropriate job fairs to enhance recruitment efforts.
  - GNHTD communicates with prospective employees through a posted notice that the agency is an Equal Opportunity Employer; and
  - All recruiting advertising includes the following statement: Greater New Haven Transit District is an Equal Opportunity Employer.

**GNHTD generally recruits employees in the following periodicals and websites:**

- o CT Job Bank
- o Jobsinct.com in conjunction with outreach periodicals
- o American Public Transportation Association's - "Passenger Transport"
- o Recruitment agencies
- o Transit Talent
- o Indeed.com

## COMMUNITY OUTREACH

GNHTD has created a new outreach initiative in which they facilitated/hosted an onsite Community Meet and Greet Event in February 2019 to support its commitment to EEO by taking affirmative action to ensure that qualified job seekers are recruited and job applicants are considered for employment opportunities without regard to their race, color, religion, sex, national origin, or status as a qualified individual with a disability or Vietnam era or other protected veterans.

GNHTD has adopted procedures to ensure compliance with federal and state requirements for the provision of Equal Employment Opportunity. GNHTD has partnered with organizations such as:

- o Workforce Alliance
- o U. S. Department of Veteran Affairs and their vocational rehabilitation department to provide employment opportunities for Veterans.
- o Town of Hamden Community Services
- o American Job Center Network
- o New Haven Veteran Center
- o Hamden Economic Development & Neighborhood Revitalization

# UTILIZATION ANALYSIS

The following analysis of the population statistics of the town of Hamden will enable Greater New Haven Transit District identify areas of underutilization in relation to market availability. This analysis will identify job categories that have an underutilization or concentration of minorities and women in relation to their availability in the relevant labor market. The analysis establishes the framework for goals and timetables to correct employment practices that contributed to any identified underutilization or concentration.

### 1. Definition Applicable to All Employers

- a. "**Commission**" refers to the Equal Employment Opportunity Commission established under Title VII of the Civil Rights Act of 1964.
- b. "**Employee**" means an individual employed by a political jurisdiction, who is on the payroll of that jurisdiction, regardless of the source of the funds by which the worker is paid. The following is an exception from the definition, subject to the interpretation in Section 7 above these instructions. The term "employee" shall not include any person elected to public office in any State or political subdivision of any state by the qualified voters thereof, or any person chosen by such officer to be on such officer's personal staff, or an appointee on the policy making level or an immediate adviser with respect to the exercise of the constitutional or legal powers of the office. The exception set forth in the preceding sentence shall not include employees subject to the civil service laws of a State government, governmental agency or political subdivision.
- c. "**Full-time Employees**" - Persons employed during this pay period to work the number of hours per week that represent regular full-time employment (excluding temporaries and intermittents).



- d. **"Other Than Full-time Employees"** - Persons employed during this pay period on a part-time basis. Include those daily or hourly employees usually engaged for less than the regular full-time work week, temporaries working on a seasonal basis (whether part-time or full time) or hired for the duration of a particular job or operation, including public employment programs, and intermittents.
- e. **"New Hires During Fiscal Year"** - Persons both with and without previous experience and transfers who were hired for the first time in this jurisdiction or rehired after a break in service for permanent full-time employment.

## 2. Race/Ethnic Identification

An employer may acquire the race/ethnic information necessary for this section either by visual surveys of the work force, or from post-employment records as to the identity of employees. Since visual surveys are permitted, and the fact that race/ethnic identifications are not present on agency records is not an excuse for failure to provide the data called for. However, although the Commission does not encourage direct inquiry as a method of determining racial or ethnic identity, this method is not prohibited in cases where it has been used in the past, or where other methods are not practical, provided it is not used for purposes of discrimination.

Moreover, the fact that employees may be located at different addresses does not provide an acceptable reason for failure to comply with the reporting requirements. In such cases, it is recommended that visual surveys be conducted for the employer by persons such as supervisors who are responsible for the work of the employees or to whom the employees report for instruction or otherwise.

Please note that the General Counsel of the Commission has ruled, on the basis of court decisions, that the Commission has the authority to require the racial and ethnic identification of employees, regardless of any possible conflicting state or local laws.

The concept of race as used by the Equal Employment Opportunity Commission does not denote clear-cut scientific definitions of anthropological origins. For the purposes of this report, an employee may be included in the group to which he or she appears to belong, identifies with, or is regarded in the community as belonging. However, no person may be counted in more than one race/ethnic category.

NOTE: The category "HISPANIC", while not a race identification, is included as a separate race/ethnic category because of the employment discrimination often encountered by this group; for this reason do not include HISPANIC under either "white" or "black".

For the purposes of the report, the following race/ethnic categories will be used:

- a. **White (not of Hispanic origin):** All persons having origins in any of the original peoples of Europe, North Africa, or the Middle East.
- b. **Black (not of Hispanic origin):** All persons having origins in any of the Black racial groups of Africa.
- c. **Hispanic:** All persons of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.
- d. **Asian or Pacific Islander:** All persons having origins in any of the original peoples of the Far East, Southeast Asia, the Indian Subcontinent, or the Pacific Islands. This area includes, for example, China, India, Japan, Korea, the Philippine Islands, and Samoa.

- e. **American Indian or Alaskan Native:** All persons having origins in any of the original peoples of North America, and who maintain cultural identification through tribal affiliation or community recognition.

### 3. Description of Job Categories

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



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

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

#### **UTILIZATION ANALYSIS – GNHTD'S Workforce and Regional Availability**

GNHTD's Utilization Analysis was performed to identify job categories that have an underutilization or concentration of minorities and women in relation to their availability in the relevant labor market. The analysis also establishes the framework for goals and timetable to correct employment practices that contributed to any identified underutilization or concentration.

In order to determine whether minority groups are fully and fairly utilized with respect to its employment practices, GNHTD has prepared a Workforce Analysis and an Availability Analysis to draw a comparison between the GNHTD's workforce and likely available labor.

#### **GNHTD Labor Market**

The analysis was completed for GNHTD's relevant labor market defined as the New Haven and Fairfield Counties for the following labor categories:

- o Officials and Managers
- o Office and Clerical
- o Skilled Craft Workers (Mechanics)
- o Semi-Skilled Operatives (Drivers)
- o Laborers

#### **Workforce Analysis – GNHTD's Labor Needs**

The workforce analysis is a breakdown of GNHTD's workforce by each department and job category. The table on the next page provides the details of current staffing. (see Chart 1)



Chart 1

Department	Title	Current Number	EEO Category
Operations	Driver Full Time	76	Semi-Skilled Operative
	Driver Part Time	22	Semi-Skilled Operative
	Supervisor	5	Officials and Managers
	Dispatcher	7	Office and Clerical
	Customer Service Representatives	6	Office and Clerical
	Schedulers	2	Office and Clerical
	Associate Operations Manager	2	Officials and Managers
	Operations Associate	1	Office and Clerical
Maintenance	Mechanic	4	Skilled Craft Workers
	Administrative Assistant	1	Administrative Support
	Facility & Maintenance Manager	1	Officials and Managers
Finance	Chief Administrative Officer	1	Officials and Managers
	Purchasing Assistant	1	Office and Clerical
	Manager of Grants and Procurement	1	Officials and Managers
	Human Resources Generalist	1	Officials and Managers
	Payroll Associate	1	Office and Clerical
Administration	Chief Operations Officer/EEO Officer	1	Officials and Managers
	Administrative Assistant	1	Office and Clerical
	Manager Special Projects	1	Officials and Managers
	ADA Coordinator	2	Office and Clerical
	Director Risk Management	1	Officials or Managers
	Executive Director	1	Officials or Managers
	<b>Total</b>	<b>139</b>	

“Minority or Minority Group Persons are defined in FTA Circular 4704.1A and include: African American, Hispanic, Asian or Pacific Islander, American Indian or Alaskan Native.”

**New Haven/Fairfield Counties Labor Availability Analysis**

An Availability Analysis, the comparison of the participation rates (percentages) of minorities and women in various areas of the workforce to their availability in GNHTD’s labor markets, was prepared. A summary of the outcome comparing the local labor market with the current GNHTD workforce is provided below.

**Below is a summary of GNHTD’s overall labor force as of June 30, 2019**

Labor Force	Total	Total Minority	Percent Minority	Total Female	Percent Female
Officials or Managers	15	9	60%	7	47%
Administrative Support (Office and Clerical)	22	9	41%	16	73%
Skilled Craft Workers (Mechanic)	4	0	0%	0	0%
Semi-Skilled Operatives (Drivers)	98	74	76%	18	19%
Laborers					
<b>Totals</b>	<b>139</b>	<b>92</b>	<b>67%</b>	<b>41</b>	<b>30%</b>

**Labor Analysis Data**

The labor analysis included in this program was prepared using the U.S. Census American Fact Finder - Detailed Census Occupation by Sex, and Race/Ethnicity for Residence Geography for New Haven/Fairfield Counties, Connecticut - Total Population Universe including the civilian labor force 16 years and over.

The Census EEO data is sponsored by four Federal agencies consisting of the Equal Employment Opportunity Commission (EEOC), the Employment Litigation Section of the Civil Rights Division at the Department of Justice (DOJ), the Office of Federal Contract Compliance Programs (OFCCP) at the Department of Labor, and the Office of Personnel Management (OPM). The complete census data is available by contacting GNHTD.

Overall Force	GNHTD Percent Minority	Regional Percent Minority	GNHTD Percent Female	Regional Percent Female
Officials or Managers	60%	11.4%	47%	34.08%
Administrative Support (Office and Clerical)	41%	18.0%	73%	74.2%
Skilled Craft Workers (Mechanic)	0%	19.5%	0%	3.2%
Semi-Skilled Operatives (Drivers)	76%	56.40%	19%	21.8%
Laborers				

Conclusions are drawn from this analysis:

- 67% of GNHTD’s current labor force is minority; and
- 30% of GNHTD’s labor force is female

#### Short and Long Term Goals to Address Underutilization

#### Ongoing Efforts to Monitor and Promote Equal Employment Opportunities

Below is a summary of additional efforts GNHTD will undertake to ensure equal employment opportunities and workforce diversity commensurate with our available regional workforce:

**Incorporation of EEO Metrics** – GNHTD management will incorporate EEO metrics including, recruitment, hires, promotions, separations and disciplines into the agency’s management database reporting so that management can view EEO efforts on a monthly basis.

**Recruiting Efforts** – Focus on Recruitment of Female employees in labor categories where underutilization occurs.

Focus on recruitment of females in the Service and Maintenance category. There have been no job openings or hires in this category due to no employee turnover in this area.

### Description and Analysis of Recruitment and Employment Selection Procedures

#### Recruiting and Tracking Applicants

GNHTD has established a process for tracking employment application which uses a voluntary disclosure form to identify minority status and gender. This process is managed by GNHTD’s Department of Human Resources and is shown in the following chart.



## Monitoring and Reporting System

The Greater New Haven Transit District will maintain records on all employment activities including recruitment, hiring, promotions, disciplinary actions and salary adjustments to provide supportive data for actions that impact protected class individuals. These records will serve as a specific and precise database for current and future projections. They will also enable GNHTD the ability to monitor the success of the Equal Employment Opportunity Program and provide the opportunity for any corrective action necessary.

### GNHTD's Recruitment Process

<b>1</b>	<b>Job Opening</b>	<b>Vacancy or new position opens</b>
<b>2</b>	<b>Job Description</b>	<b>Job description reviewed and updated</b>
<b>3</b>	<b>Advertisement</b>	<b>Advertisements placed internally, externally or both</b>
<b>4</b>	<b>Applicants</b>	<b>Applications received and reviewed by Human Resources - EEO Tracking Begins</b>
<b>5</b>		<b>Applications reviewed by Department leader</b>
<b>6</b>	<b>Interviews</b>	<b>Interviews conducted</b>
<b>7</b>	<b>Selection</b>	<b>Candidates selected</b>
<b>8</b>	<b>Candidate Check List</b>	<b>Conditional offer of hire, background check, motor vehicle check if required, D2 Form if required, drug test, etc.</b>

### **Internal Transfers**

The available position is posted internally, and employees must complete a job application. The application should be submitted to Human Resources on or before the expiration date of the posted position. All applicants for a position will be considered on the basis of their qualifications and their ability to perform the job successfully. Once transferred, employees will enter into a probationary period for the new position.

### **Description and Analysis of Seniority Practices and Provisions**

#### **Recruiting, Promotional Opportunities, Discipline and Separation**

##### **(Bargaining and Non-Bargaining Unit Employees)**

GNHTD regularly reviews recruiting, promotional opportunities, discipline and separation by group and gender. The outcome of this review for the period of June 2018 through June 2019 is summarized on the following pages.

Recruitment (New Hires)	Total	Total Minority	Percent Minority	Total Female	Percent Female
Officials or Managers	3	1	33%	2	66%
Administrative Support (Office and Clerical)	8	4	50%	6	75%
Skilled Craft Workers (Mechanic)	2	0	0%	0	0%
Semi-Skilled Operatives (Drivers)	46	43	93%	13	28%
Laborers	1	0	0%	0	0%

Promotions	Total	Total Minority	Percent Minority	Total Female	Percent Female
Officials or Managers	5	3	60%	2	40%
Administrative Support (Office and Clerical)	1	0	0%	1	100%
Skilled Craft Workers (Mechanic)	0	0	0%	0	0%
Semi-Skilled Operatives (Drivers)	36	31	86%	9	24%
Laborers	1	1	100.00%	0	0%



Disciplinary Actions	Total	Total Minority	Percent Minority	Total Female	Percent Female
Officials or Managers	2	2	100.00%	0	0%
Administrative Support (Office and Clerical)	5	1	20%	3	60%
Skilled Craft Workers (Mechanic)	0	0	0%	0	0%
Semi-Skilled Operatives (Drivers)	43	35	82%	18	42%
Laborers					

Separations	Total	Total Minority	Percent Minority	Total Female	Percent Female
Officials or Managers	7	1	14%	3	42%
Administrative Support (Office and Clerical)	12	4	33%	8	67%
Skilled Craft Workers (Mechanic)	0	0	0%	0	0%
Semi-Skilled Operatives (Drivers)	59	38	64%	18	30%
Laborers					

**Promotional Opportunities, Discipline and Separation for Bargaining Unit Employees**

GNHTD operates under collective bargaining agreements with Teamsters Local 443 which covers 72% of all employees. Processes pertaining to Job classifications, seniority, terminations, layoffs and other working conditions can be reviewed in the July 1, 2017 – June 30, 2020 Collective Bargaining Agreement between Teamsters Local 443 Union and GNHTD, which is available by contacting GNHTD.

# APPENDIX

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## Goals and Timetables

## **Short and Long Term Goals to Address Underutilization**

### **Ongoing Efforts to Monitor and Promote Equal Employment Opportunities**

Long Term Goals – During the upcoming three years, GNHTD foresees no major change in the total number of employees in any of the analyzed job categories. Today, there are no planned expansions or contractions of services expected and State investment in GNHTD operations is expected to keep pace with operating costs but not allow for significant expansion. As a result, reaching parity in the areas of underutilization will need to be addressed through turnover in the current staff with no general change in the overall staff levels of each job category.

GNHTD will ensure that its Human Resource staff and all managers fully understand the areas of underutilization, although minimal, and work to close the identified gaps (predominantly focusing on increasing the participation of women in the identified areas) through the recruiting process when a position opens and through internal promotions when the opportunities arise.

Short Term Goals – During the current fiscal year, GNHTD has reduced its staff through attrition and departmental restructuring. There are currently no vacancies that underutilized employees can fill. GNHTD does forecast job vacancies in one of the areas where underutilization occurs, Part Time Drivers. As a result, GNHTD is in a continual recruitment effort for these positions. It is in these areas where staff will make a good faith effort to reach parity.

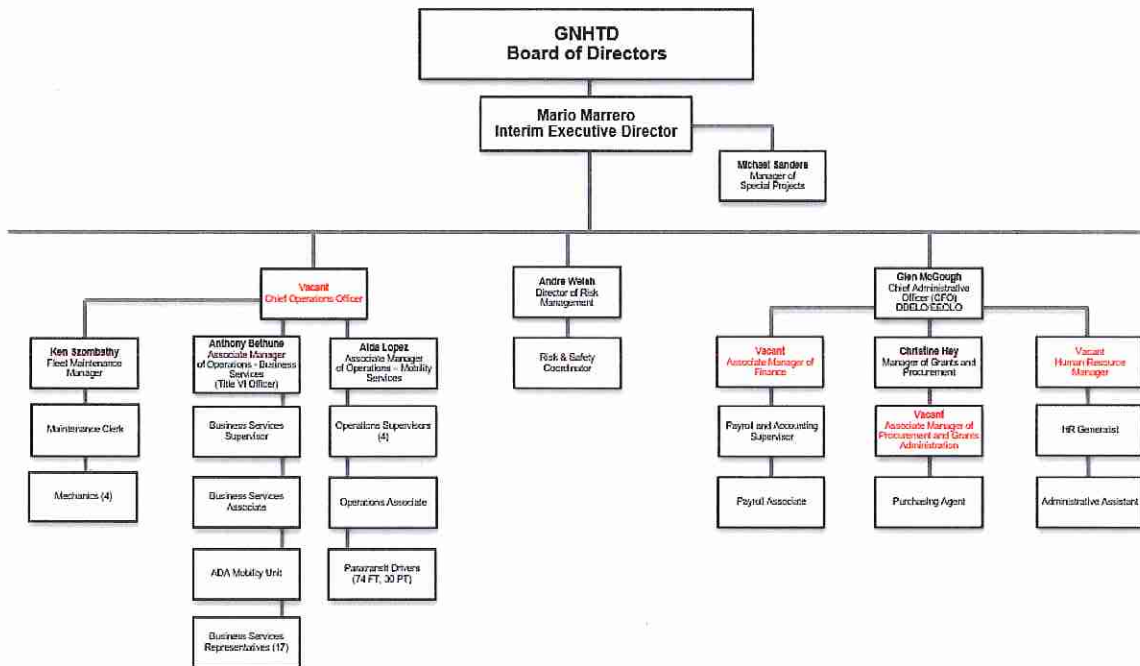


**Questions/Comments**

If you have any questions about GNHTD's EEO Plan or would like additional information, please contact:

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# Greater New Haven Transit



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