

GOLDEN GATE BRIDGE, HIGHWAY AND TRANSPORTATION DISTRICT

RESOLUTION NO. 2012-068

**APPROVE IMPLEMENTATION OF A
THREE-YEAR AFFIRMATIVE ACTION PLAN**

October 12, 2012

WHEREAS, in accordance with the requirements set forth in Federal Transit Administration (FTA) Circular 4704.1, "Equal Employment Opportunity Program Guidelines for Grant Recipients" dated July 26, 1988, the Golden Gate Bridge, Highway and Transportation District (District) is required to submit an Affirmative Action Program (AAP) to the FTA every three years for review and approval; and,

WHEREAS, in compliance with this reporting requirement, the Employee Relations and Diversity Programs Office, in concert with the Human Resources Department, reviewed and updated the AAP, ending as of June 30, 2012; and,

WHEREAS, the new AAP covers the three-year period from July 1, 2012, through June 30, 2015, and provides a key management opportunity to lay out guidance for the organization's growth and development; and,

WHEREAS, the Rules, Policy and Industrial Relations Committee/Committee of the Whole, at its meeting of October 12, 2012, has so recommended; now, therefore, be it

RESOLVED that the Board of Directors of the Golden Gate Bridge, Highway and Transportation District hereby approves the three-year Affirmative Action Program (AAP), for the period from July 1, 2012 through June 30, 2015; and, authorizes the submittal of the AAP to the Federal Transit Administration for review and approval.

ADOPTED this 12th day of October 2012, by the following vote of the Board of Directors:


AYES (16): Directors Arnold, Chu, Cochran, Fredericks, Moylan, Pahre, Rabbitt, Renée, Sears, Snyder, Sobel, Stroeh and Theriault; Second Vice President Grosboll; First Vice President Eddie; President Reilly

NOES (0): None

ABSENT (3): Directors Campos, Elsbernd and Mar



Janet Reilly
President, Board of Directors

ATTEST: 

Janet S. Tarantino
Secretary of the District

Golden Gate Bridge Highway and Transportation District

EQUAL EMPLOYMENT OPPORTUNITY PROGRAM



July 1, 2012 through June 30, 2015

Prepared by:

**GGBHTD
EEO Office
P.O. Box 9000, Presidio Station
San Francisco, CA 94129-0601**

EEO-4 #: 06507270

October 2012

GOLDEN GATE BRIDGE, HIGHWAY AND TRANSPORTATION DISTRICT EQUAL EMPLOYMENT OPPORTUNITY PROGRAM AFFIRMATIVE ACTION PLAN

Table of Contents

INTRODUCTION	III
Applicable Affirmative Action Laws and Regulations	iv
Protected Groups	iv
Race/Ethnic Categories	iv
Employment Status	v
Program Terminology	v
Reliance on EEOC Guidelines	vi
Reporting Period	vi
Statement of Purpose	vi
EEO Statement of Policy by the General Manager	viii
CHAPTER 1: ORGANIZATIONAL PROFILE	1
CHAPTER 2: DISSEMINATION	2
CHAPTER 3: PROGRAM ADMINISTRATION RESPONSIBILITY	4
CHAPTER 4: ACTION-ORIENTED PROGRAMS	8
CHAPTER 5: WORKFORCE UTILIZATION ANALYSIS AND LINES OF PROGRESSION	10
CHAPTER 6: JOB GROUP ANALYSIS	11
CHAPTER 7: COMPARING INCUMBENCY TO AVAILABILITY	13
CHAPTER 8: PLACEMENT GOALS AND TIMETABLES	15
CHAPTER 9: IDENTIFICATION OF PROBLEM AREAS	16
CHAPTER 10: INTERNAL AUDIT AND REPORTING	17
CHAPTER 11: VETERANS AND PERSONS WITH DISABILITIES	18
CHAPTER 12: HOW TO FILE AN EEO/AAP COMPLAINT	20
CHAPTER 13: SUMMARY OF UTILIZATION REPORTS	23
Exhibit 1 Organizational Charts	
Exhibit 2 Workforce Analysis	
Exhibit 3 Job Group Analysis	
Exhibit 4 Final Availability	
Exhibit 5 Incumbency to Availability	
Exhibit 6 Placement Goals	
Exhibit 7 Personnel Transactions Summary	
Exhibit 8 Compensation Data	

INTRODUCTION

GOLDEN GATE BRIDGE, HIGHWAY AND TRANSPORTATION DISTRICT (the "District") is a public transit agency founded in 1937 in the State of California and organized pursuant to the California Streets and Highways Code to operate and maintain the Golden Gate Bridge. In 1969, with the mandate from the California State Legislature to enter the public transit business, the District planned, developed, and implemented what is today a nationally renowned bus and ferry system. The District is also unique among Bay Area transit operations because it provides transit services without support from local sales tax measures or dedicated general funds. As the District does not have the authority to levy taxes, the use of surplus Bridge toll revenue is the only available local means the District has to support the District's regional transit services. Presently, Golden Gate Transit Bus and Golden Gate Ferry operations are funded nearly 50 percent by surplus Golden Gate Bridge tolls and 20 percent by transit fares. The remainder is met by federal, state and local subsidies along with advertising, concessions, and property equipment rental revenues and District reserves.

Mission Statement:

The Mission of the Golden Gate Bridge, Highway and Transportation District is to provide safe, efficient and reliable means for the movement of people, goods, and services within the Golden Gate Corridor. In carrying out this mission, the District operates and maintains the Golden Gate Bridge in structurally sound condition to provide safe and efficient travel for vehicles and other modes of transportation; provide public transit services, such as buses and ferries, which operate in a safe, affordable, timely and efficient manner; and carries out its activities in a cost-effective and fiscally responsible manner. The District recognizes its responsibility to work as a partner with federal, state, regional and local governments and agencies to best meet the transportation needs of the people, communities and businesses of San Francisco and the North Bay.

Federal Transit Laws:

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 District is subject to the Federal Transit Laws that require equal employment opportunity and the affirmative action requirements of United States Department of Transportation Circular 4704.1, Equal Employment Opportunity Program Guidelines for Grant Recipients of the Federal Transit Administration (FTA). Because the District has employed 50 or more transit-related employees (including temporary, full-time or part-time employees either directly and/or through contractors) *and* received in excess of \$1 million in capital or operating assistance or in excess of \$250,000 in planning assistance in the previous federal fiscal year, it is required to prepare a triennial written Affirmative Action Plan (AAP) for minorities and women. Failure to comply with these laws which are enforced by the FTA can result in debarment of the District from future contracts and subcontracts.

Affirmative Action is a term that encompasses any measure adopted by an employer to correct or to compensate for past or present discrimination or to prevent discrimination from recurring in the future. Affirmative Action goes beyond the simple termination of a discriminatory practice.

Equal Employment Opportunity Program

As stipulated in federal regulations, a prerequisite to the development of a satisfactory Affirmative Action Plan is the evaluation of opportunities for protected group members, as well as an identification and analysis of problem areas inherent in their employment. Also, where a statistical analysis of the employee workforce reveals a numeric disparity between incumbency and availability of minorities or women, an adequate AAP details specific affirmative action steps to ensure equal employment opportunity. These steps are keyed to the problems and needs of protected group members. For minorities and women, such steps include the development of hiring and promotion goals to rectify the disparity between incumbency and availability. It is toward this end that the following EEO Program was developed. This EEO Program covers the period from July 1, 2012 through June 30, 2015.

APPLICABLE AFFIRMATIVE ACTION LAWS AND REGULATIONS

The District's EEO/AAP for minorities and women has been prepared according to FTA Circular 4704.1. The District is required to comply with the program guidelines of the FTA Circular 4704.1, "Equal Employment Opportunity Guidelines for Grant Recipients." While the District is not required under FTA to establish numerical goals for Veterans or Disabled individuals, it does take affirmative steps to outreach to those groups and to ensure equitable treatment of Veteran and Disabled applicants and employees. The District complies with all relevant state and federal laws to ensure equitable treatment for all District employees and applicants.

PROTECTED GROUPS

Coverage under affirmative action laws and regulations applies to:

1. Women
2. Minorities who are recognized as belonging to or identifying with the following race or ethnic groups: Blacks/African Americans, Hispanics/Latinos, Asians/Pacific Islanders, and American Indians/Alaskan Natives.

RACE/ETHNIC CATEGORIES

The race/ethnic groups used in this EEO/AAP are defined by the EEOC as follows:

- **White:** (not of Hispanic origin) – All persons having origins in any of the original peoples of Europe, North Africa or the Middle East
- **Black/African American:** (not of Hispanic origin) – All persons having origins in any of the Black racial groups of Africa
- **Hispanic:** All persons of Mexican, Puerto Rican, Cuban, Spanish-speaking Central or South American, or other Spanish culture or origin, regardless of race
- **Asian/Pacific Islander:** All persons having origins in any of the original peoples of Japan, China, the Far East, Southeast Asia, Philippine Islands, Indian Subcontinent, the Pacific Island, including Hawaii, Samoa, Guam or Tahiti

Equal Employment Opportunity Program

- **Native American (American Indian/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

EMPLOYMENT STATUS

Regular: Employees, including those represented by a collective bargaining agreement, completing the number of hours per week that represent regular employment, including regular full-time, regular limited term, and regular part-time workers. These positions are specifically approved by the Board of Directors through its budget process or through amendments to the Table of Organization.

Non-regular: Employees, including any represented by a collective bargaining agreement, who work on a casual/on-call, hourly, temporary, seasonal, or other basis and are not in Board-authorized regular positions, are not included in this plan. Provisional workers who fill in for a regular employee are included in this category.

Employees who have employment with the District but whose employment is not administered by the District, or the District is not their employer of record, are not included in this plan (i.e., Ferry Division Casual Deckhands and Terminal Assistants).

PROGRAM TERMINOLOGY

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

The comparison of incumbency to availability contained herein is required by Government regulations to be based on certain statistical comparisons. Geographic areas and sources of statistics used herein for these comparisons were used in compliance with Government regulations, as interpreted by Government representatives. The use of certain geographic areas and sources of statistics does not indicate the District's agreement that the geographic areas are appropriate in all instances of use or that the sources of statistics are the most relevant. The use of such geographic areas and statistics may have no significance outside the context of this AAP. Such statistics and geographic areas will be used in good faith with respect to this AAP. The grouping of job titles into a given job group does not suggest that the District believes the jobs so grouped are of comparable worth.

Whenever the term "goal" is used, it is intended that it "should not be used to discriminate against any applicant or employee because of race, color, religion, national origin, gender or age."

Applicants for Employment are defined according to regulatory policy decisions and EEOC guidelines. The District's definition of an applicant in this EEO Program is:

1. An individual who submits an expression of interest in being considered for employment;
2. An individual who the District considered for employment in a particular position;
3. An individual whose expression of interest in employment indicates he or she possesses the qualifications for the position; and,
4. An individual who at no point in the selection process prior to receiving an offer of employment removes himself or herself from further consideration or otherwise indicates that he or she is no longer interested in the position.

The total number of applicants for regular employment with the District from July 1, 2009 through June 30, 2012, was 900.

This EEO/AAP is not intended to create any contractual or other rights in any person or entity.

RELIANCE ON EEOC'S GUIDELINES

Although the District does not believe any violation of Title VII of the Civil Rights Act exists, it has developed this EEO/AAP in accordance with and in reliance upon the EEOC's Guidelines on Affirmative Action, Title 29 Code of Federal Regulations, Part 1608.

REPORTING PERIOD

This EEO/AAP covers the following reporting period: July 1, 2012 to June 30, 2015.

STATEMENT OF PURPOSE

This EEO/AAP has been designed to bring women and members of minority groups, covered veterans, and persons with disabilities, into all levels and segments of the District's workforce in proportion to their representation in the qualified relevant labor market.

The EEO/AAP, therefore, is a detailed, results-oriented set of procedures which, when carried out, results in full compliance with equal employment opportunity requirements through the equal treatment of all people.

The manner in which this is to be accomplished becomes technical and somewhat complicated. There are several reasons for this. First, the District is subject to and must address a variety of State and Federal laws and guidelines dealing with equal employment opportunity and affirmative action. These guidelines and requirements are in themselves somewhat technical and complex. In addition, relevant court decisions, which are often useful in interpreting, but sometimes conflicting with these requirements and guidelines, must be taken into account when developing and implementing the EEO/AAP. Furthermore, in determining the District's current equal employment opportunity and affirmative action position and its desired future achievements, numbers, percentages, statistics, numerous calculations and computations must

Equal Employment Opportunity Program

come into play. The technical, legal, and mathematical aspects of the AAP, however, all have one common purpose—to allow us to properly identify three key concepts:

1. Where we stand now,
2. Where we must go,
3. How best to get there.

These three concepts are the **Equal Employment Opportunity/Affirmative Action Plan**.

The Statement of Policy and federal and state notices of Equal Employment Opportunity will be posted throughout the workplace.

The Statement of Policy and a discussion of equal employment opportunity shall be part of any new employee orientation.

EEO/Affirmative action Policy Statement

PLACEHOLDER FOR GM STATEMENT

1 PAGE

CHAPTER 1: ORGANIZATIONAL PROFILE

The District's Board of Directors is comprised of 19 members, representing 6 counties: County of San Francisco (9 Directors); County of Marin (4 Directors); County of Sonoma (3 Directors); County of Napa (1 Director); County of Mendocino (1 Director); and County of Del Norte (1 Director).

The nineteen-member Board of Directors sets policy for the District. To assist the Board of Directors in implementing policy, there are five Officers of the District (General Manager, Secretary, Auditor/Controller, District Engineer and Attorney). In addition, there are four Division Managers (Bridge, Bus, Ferry and Administration and Development) and various Department Heads who assist in implementing the policy of the District.

As of June 30, 2012, there were 732 regular employees working throughout various departments that comprise the organization. The majority of District employees are covered through collective bargaining units.

The represented bargaining units are:

1. Amalgamated Transit Union 1575
2. Transport Workers Union of America, Local 250-A, AFL-CIO
3. Operating Engineers, Local Union No. 3
4. United Brotherhood of Carpenters and Joiners of America, Local Union No. 22
5. Cement Masons Union Local 580
6. International Brotherhood of Electrical Workers, Local Union No. 6
7. International Association of Bridge, Structural, Ornamental, Reinforced Iron Workers, Riggers and Machinery Movers, Local Union 377
8. Laborers' International Union of North America, AFL-CIO, Local Union No. 291
9. Teamsters Local Union No. 665
10. International Association of Machinists & Aerospace Workers, AFL-CIO, Machinists Automotive Trades District Lodge 190, Peninsula Auto Mechanics Local Lodge 1414
11. International Brotherhood of Painters and Allied Trades, District Council No. 16
12. Local Union No. 38 of the United Association of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry
13. International Brotherhood of Teamsters Local 856
14. Inlandboatmen's Union of the Pacific
15. District No. 1-PCD, Marine Engineers' Beneficial Association (AFL-CIO)
16. IFPTE, Local 21

See Exhibit 1 for a copy of the District's Organizational Charts

CHAPTER 2: DISSEMINATION OF THE EEO/AAP

Effective implementation of an EEO/AAP requires identification of specific procedures that will be used to disseminate the EEO/AAP. The District has therefore identified the following steps to ensure effective internal and external communication regarding the EEO/AAP:

Internal Dissemination:

The following provides examples of the methods used to disseminate information about the District's EEO/AAP to employees:

1. The General Manager disseminates the District's EEO Statement of Policy to District employees annually.
2. The District's EEO Policies are provided to new employees in the new employee packet and discussed in orientation and management training.
3. EEO Policies are included in appropriate in-house publications such as the *Human Resources Guide*, employee newsletter and other and other EEO-related communications.
4. Meetings are conducted with managers to explain the intent of the EEO Program and their responsibility for effective implementation, making clear the General Manager's commitment on behalf of the District as an employer.
5. Union officials are informed of the District's policy and its EEO/AAP obligations and requested to cooperate with achieving goals. Nondiscrimination language is included in union contracts.
6. The EEO/AAP policy statement is posted along with required state and federal EEO regulations/posters, on the District's bulletin boards.
7. The District's in-house publications picture women, minorities, and disabled employees.
8. Employees may contact the Employee Relations and Diversity Programs Administrator (Susan Spencer) at 415/257-4537 for information or questions relating to EEO policies and the Affirmative Action Plan.

External Dissemination:

External Dissemination is the communication of the District's EEO/AAP to various groups and organizations throughout the community through steps which include:

1. Provide information on the District's EEO/AAP to recruitment sources, minority and women's organizations as well as groups representing veterans and individuals with disabilities.
2. Make copies of the District's EEO/AAP available to community groups, organizations and individuals at their request.
3. Publicize the District's EEO statement with public media sources through newspapers, journals, online advertising and other appropriate media.

Equal Employment Opportunity Program

4. Initiate and maintain communication with organizations having special interests in the recruitment of and job accommodations for minorities, women, veterans and individuals with disabilities.
5. Include on all employment applications and job postings the District's EEO/AAP policy language which states that all qualified applicants will be considered regardless of race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, genetic information, marital status, sex, gender, gender identity, gender expression, age, sexual orientation or military status.
6. Include the provision: "Equal Employment Opportunity and Affirmative Action Employer" in all recruitment advertising.
7. Include "Equal Employment Opportunity and Affirmative Action Employer," in its entirety, in all purchase orders and contracts.
8. Notify prospective vendors, suppliers, contractors, and subcontractors of their obligations in EEO/AAP and affirmative action activities.
9. Picture minority and non-minority men and women and persons with disabilities in all relevant advertising or District-sponsored publications prepared for external dissemination.

CHAPTER 3: PROGRAM ADMINISTRATION RESPONSIBILITY

As part of its efforts to ensure equal employment opportunity to all individuals, the District has designated specific responsibilities to various staff to ensure the EEO/AAP focuses on all components of the employment system. To that end, the following responsibilities have been assigned:

Board of Directors

The Board of Directors is responsible for review, approval and adoption of the District's EEO/AAP Plan every three years.

General Manager

The ultimate responsibility and accountability for implementing the EEO/AAP rests with the General Manager. The General Manager is responsible, through the Employee Relations and Diversity Programs Administrator, the Administration & Development, Bridge, Bus and Ferry Deputy General Managers and various Department directors, managers, administrators and supervisors, for adherence to the District's policies of equal employment opportunity and affirmative action. This role includes, but is not limited to, the following duties:

1. Designate appropriate personnel with the responsibility for overseeing, administering, implementing, and monitoring the District's AAP. Ensure that these personnel are identified in writing by name and job title.
2. Ensure that those designated personnel responsible for all EEO/AAP components are given the necessary authority and top management support and staffing to successfully implement their assigned responsibilities.
3. Annually issue the District's EEO Statement of Policy to restate the District's commitment to EEO and to undertake an Affirmative Action Program in accordance with the requirements of the U.S. Department of Transportation Urban Mass Transportation Administration Circular 4704.1.
4. Impart the personal direction that ensures total involvement and commitment to equal employment opportunity programs through the District's EEO/AAP.

Employee Relations and Diversity Programs Administrator

The Employee Relations and Diversity Programs Administrator is responsible for overall development, implementation and monitoring of the EEO/AAP. The Employee Relations and Diversity Programs Administrator works under the supervision of the General Manager. The Employee Relations and Diversity Programs Administrator will ensure compliance with all relevant policies and procedures through directors, managers, administrators and supervisors. Successful implementation of this program is a basis for evaluating the Employee Relations and Diversity Programs Administrator's effective work performance.

Equal Employment Opportunity Program

The Employee Relations and Diversity Programs Administrator's responsibilities include, but are not limited to, the following:

1. **EEO Policy and Programs:** Recommend and implement policies and procedures necessary to attain equal employment goals, including the EEO Policy Statement and Program. Collaborate with Human Resources to ensure that new employees receive orientation that includes information on the District's EEO policies and procedures.
2. **Assist Management in Data Needs, Setting Goals and Timetables:** Work with legal counsel to keep management informed of the latest developments in equal employment opportunity regulatory requirements and legal decisions. Use workforce utilization analysis to facilitate review of departmental performance against availability/goals. Provide guidance to managers in taking proper action to ensure a non-discriminatory, respectful and comfortable work environment exists for all employees.
3. **Internal Monitoring and Reporting System:** Develop, implement, and maintain audit and reporting systems to measure the effectiveness of EEO programs, including those that will indicate the need for remedial action, and determine the degree to which goals and objectives have been obtained. Periodically review each department's EEO efforts to ensure compliance with the District's EEO policies. Monitor action-oriented programs to make sure they are broad-based and inclusive.
4. **Reporting Periodically to the General Manager on EEO Progress:** Periodically meet with the General Manager to review the District's EEO Program and recommend any modifications to the District's EEO Program policies necessary to ensure equal employment opportunity for all current and potential employees within existing EEO guidelines.
5. **Liaison to Outside Organizations/Groups:** Serve as a liaison between the District and organizations representing minorities, women, persons with disabilities, veterans and community action groups concerned with Diversity and employment opportunities for protected classes. Develop policy statements, action-oriented programs, and internal and external communication techniques regarding the EEO Program.
6. **Current Information Dissemination:** Disseminate the District's EEO Policy and other appropriate elements of the program to employees, applicants and the general public through internal and external communications.
 - a. **Internal Communications:** Ensure that the District's EEO Policy is included in the Human Resources Guide and prominently posted on official Bulletin Boards accessible in each building. Regularly communicate with managers and supervisors to discuss the EEO Program and progress toward goals. Discuss the EEO Program at New Employee Orientations. Disseminate information on the latest EEO developments to management and employees through training and/or personal contact regarding EEO guidelines and legislation.
 - b. **External Communications:** Provide EEO Policy updates to recruitment sources such as employment agencies, unions, educational institutions, minority, disability and women's organizations. Advertise with public media sources, newspapers and other journals aimed at minority and women populations. Ensure that all recruitment announcements include

a statement that the District is an Equal Opportunity/Affirmative Action Employer. Ensure that equal employment opportunity clauses are incorporated as part of all purchase orders and contracts.

7. **Recruitment Assistance/Establish Outreach Sources:** Review applicant flow data to determine if recruitment efforts are eliciting the desired results involving the applicant rates of underutilized groups. Review information on promotions, transfers and terminations to determine if any groups are experiencing adverse impact trends. Review and update the District's outreach list, as appropriate.
8. **Concur in All Hires/Promotions:** Conduct impact analysis to determine if any groups are experiencing adverse impact trends and to ensure that appropriate steps are taken to meet utilization goals.
9. **Process Employment Discrimination Complaints:** Investigate allegations of discrimination. Take appropriate steps to seek information from supervisors and knowledgeable persons about the reported issue. Respond to complaints of discrimination pursuant to District policies and procedures. Serve as the liaison between the District and enforcement agencies. Review personnel actions and decisions to ensure that no incidents of illegal discrimination, harassment or retaliation result.
10. **Compliance:** Ensure that the District's EEO-4 Reporting Form is properly completed and timely submitted to the Equal Employment Opportunity Commission. Ensure that the District's Affirmative Action Plan is properly completed and timely submitted to the Federal Transit Administration.

Human Resources Director

The Human Resources Director, under the supervision of the Deputy General Manager, Administration and Development, ensures through District directors, managers, administrators and supervisors, that all aspects of the District's employment activities meet the District's equal employment opportunity and affirmative action commitments. Successful coordination of the EEO Program in the District's employment activities is a basis for evaluating the Human Resources Director's effective work performance.

Responsibilities include, but are not limited to, the following:

1. **Recruitment and Community Outreach:** Ensure job descriptions and announcements are free of discriminatory provisions and that qualifications are job-related, realistic, and reflect the actual work requirements of the essential job duties. Ensure recruitment announcements include a statement that the District is an "Equal Opportunity Employer/Affirmative Action Employer." Ensure that all announcements advise persons with disabilities of their right to request "reasonable accommodation" in the application or examination process in accordance with the Americans with Disabilities Act. Target outreach to groups representing minorities, women and persons with disabilities. Ensure Interview Panels are diverse, when possible.
2. **Orientation:** Ensure that new employees receive a special orientation to the District's EEO Program and are informed with regard to its objectives.
3. **Promotional Opportunity:** Offer Educational Assistance Programs for training and college course work to employees wishing to gain experience and education for future advancement, particularly for members of underutilized groups.

4. **Internal Monitoring and Reporting:** Maintain a Human Resources Information System necessary to measure program effectiveness and goal achievement to include Applicant flow data; information on new hires, promotions, transfers and terminations. Periodically audit training programs, hiring and promotion patterns to remove impediments to the attainment of EEO Program goals and objectives.

Division Managers and Department Heads

In their direct day-to-day contact with District employees, deputy general managers, directors, superintendents, managers, administrators and supervisors have all assumed certain responsibilities to help the District ensure compliance with EEO laws and the effective implementation of the EEO/AAP.

Responsibilities include but are not limited to, the following:

1. Assist in ensuring that the District, as an employer, adheres to the Statement of Policy and other EEO-related policies and affirmative action.
2. Support and assist the General Manager, Division Managers and the Employee Relations and Diversity Programs Administrator in developing, maintaining and implementing EEO policies and the AAP.
3. Provide direction to employees, as necessary, to carry out all actions required to meet the District's EEO and affirmative action commitments.
4. Collaborate with the Employee Relations and Diversity Programs Administrator and Human Resources Director to address areas of underutilization through targeted outreach and recruitment.
5. Monitor areas of responsibility for equal employment opportunities related to job assignments, training opportunities, career mentoring, special assignments, disciplinary actions performance evaluations and promotional opportunities.
6. Collaborate with the Employee Relations and Diversity Programs Administrator to assess and make reasonable accommodations for qualified applicants and employees with disabilities.
7. Cooperate with the Employee Relations and Diversity Programs Administrator during EEO complaint investigations.
8. Support District-sponsored educational, training, recreational, and social activities to ensure that all employees are encouraged to participate in accordance with nondiscrimination policies.
9. Ensure that all interviews, orders of employment, and/or wage commitments are consistent with the District's EEO policies and AAP.
10. Promote a safe and friendly work environment free from discrimination, harassment and retaliation.
11. Respond immediately and appropriately to known harassment and discrimination complaints and protect employees from retaliation because of filing a complaint.

Responsibilities of All Employees

All District employees are responsible for conducting themselves in a professional, responsible, and non-discriminatory manner. All employees involved in EEO complaint investigations (whether complainants, respondents, or witnesses) must cooperate fully with the Employee Relations and Diversity Programs Administrator during the complaint investigation process. Any employee who violates these policies and procedures will be subject to disciplinary action.

CHAPTER 4: ACTION-ORIENTED PROGRAMS

The Action-Oriented Programs designed to address the underutilization of women and minorities are listed below. These Action-Oriented Programs will be carried-out throughout the AAP year. The Employee Relations and Diversity Programs Administrator, with the help of the Human Resources Director, Division Managers and Department Heads, will be responsible in ensuring that the following are implemented:

Outreach/Recruitment:

1. The District will continue to place advertisements for job opportunities on its internet website as well as through local job service offices including the State Employment Development Department and various community colleges.
2. The District will continue to identify and provide job opportunity announcements to professional organizations and associations that are affiliated with and offer access to a diverse pool of candidates.
3. Job announcements, advertisements and contracts will carry the equal employment opportunity/affirmative action employer statements.
4. The District will continue to participate in job fairs if there are sufficient numbers of openings to warrant participation.
5. The District will continue to participate in internship, apprenticeships and training programs to the extent possible.
6. The District continues to support assistance and rehabilitation programs for its employees who experience difficulties that prevent them from being productive employees on the job so long as such employees do not violate District policies.
7. In some cases the District, as a condition of the bargaining agreement with established unions covering certain positions, does not manage the selection, hiring, or assignment of employees. However, when the District has a bargaining agreement with a union, efforts are made to collaborate with the union in the recruitment of women, minorities, veterans and disabled persons for current and future employment opportunities.

Job Specifications/Selection Process:

1. The District will continue to develop position descriptions that accurately reflect position functions and are consistent for the same position from one location to another.
2. The District will continue to develop job or classification specifications that contain academic, experience, and skill requirements that do not constitute inadvertent discrimination; and, develop specifications that are free from bias with regard to age, race, color, religion, national origin, disability or veteran status.
3. Approved classification specifications will be made available to all members of management involved in the recruiting, screening, selection, and promotion process. Copies may also be made available to recruiting sources.
4. The District will continue to carefully select and counsel all personnel involved in the recruiting, screening, selection, promotion, disciplinary, and related processes to eliminate bias in all personnel actions.

Job Advancement:

1. Minority and female employees are made available for participation in Career Days, Youth Motivation Programs and related activities in the community, as desired.
2. The District will continue to post job opportunities. The District's job posting policy requires postings of positions up to the Executive Management Team level.
3. The District will require supervisory personnel to submit justification when apparently qualified minority or female employees are passed over for upgrading into jobs where goals are established to address underutilized areas.
4. The District will establish, whenever feasible, career counseling programs to include interview training, development, mentoring, job rotation and similar programs.
5. The District will continue to provide training and development programs to all employees in a nondiscriminatory manner in an effort to encourage and assist employees with career development plans.
6. Tuition reimbursement is offered to all employees who pursue educational opportunities, in a nondiscriminatory manner and with certain limits.
7. The District will continue to support transportation programs to improve employment opportunities for minorities and females.
8. The District will continue to use its employee evaluation program. The performance appraisal is used for reviews for employees and is applied in a nondiscriminatory manner.

Community Involvement

The District continues its active involvement in community action programs and community relations programs in the following ways:

1. Key members of District management, as well as Human Resources representatives, are members, or advisors of community groups such as YMCA, Marin Forum, California Transit Association, American Public Transportation Association, Marin Human Resources Forum, Workforce Investment Board, and Rotary Club, among others. The District representation in these activities demonstrates commitment to program goals and broadens the District's exposure and access to women and minorities.
2. The District contracts with, or solicits contracts from, minority and/or female suppliers of goods and services as part of its Disadvantaged Business Enterprise (DBE) Program.
3. The District assists local schools and colleges by providing Bridge, Bus and Ferry Transit Division operations tours and discussions between students and employees to inform students of the career options available at the District.
4. The District publicizes certain achievements of its employees, such as employee of the month awards, on an internal and external basis. This practice applies equally to the achievements of minority and female employees.
5. The District encourages employees to voluntarily contribute to the United Way Campaign, which supports numerous community programs for minorities, women, and persons with disabilities, through an annual campaign coordinated by the District.
6. The District provides internships and apprenticeships to students and union members in a nondiscriminatory manner.

CHAPTER 5: WORKFORCE UTILIZATION ANALYSIS AND LINES OF PROGRESSION

Workforce Analysis

The District conducted a workforce analysis to identify employees by gender and race/ethnicity in each job title. The data for the analysis relevant to this EEO/AAP were collected from payroll records dated June 30, 2012.

Job titles are listed by organizational unit. Job titles are listed from lowest to highest paid. The list includes all job titles, including departmental supervision, exempt, and nonexempt titles. For each job title the EEO Category to which to title is assigned is provided. For each job title, the District identified the total number of employees, the number of male and female employees, the total number of minority employees, the total number of White, Black, Hispanic, Asian, Native American employees, and the male and female employees within each of these race/ethnic groups.

The total number of district regular employees as of June 30, 2012 was 732, with 21% female and 79% male. Overall minority representation was 46%.

Lines of Progression

Developed in conjunction with the workforce analysis is information on the District's lines of progression. Lines of progression (career ladders/career paths) identify the job titles through which an employee can move to the top of a line. For each line of progression, applicable departments are identified. These are the departments which employ persons in the job titles in the specified line of progression. Some lines of progression are limited to only one department, while others are found throughout several departments.

The lines of progression provide useful information regarding patterns of vertical and horizontal movement throughout our workforce. These patterns will be evaluated to ascertain whether they provide to our employees the optimum career mobility and opportunities for advancement.

[See Exhibit 2 for a copy of the Workforce Analysis](#)

CHAPTER 6: JOB GROUP ANALYSIS

Workforce availability is an estimate of the proportion of each gender and race/ethnic group within the relevant labor market that is available and qualified for employment with the District. Determining workforce availability provides an indication of the approximate level at which each demographic group could, hypothetically, be expected to be represented in a job group. Availability estimates are a way of translating equal employment opportunity into concrete numbers. Correct comparisons of the current workforce, reasonable labor market and recruitment opportunities depend on competent and accurate availability analysis.

Although the workforce analysis was conducted individually for every job title, after it was completed, job titles were grouped for the comparison of incumbency to availability and for setting goals. There were several reasons for grouping jobs.

Many job titles are so similar in content that handling them individually in the AAP is not necessary. Grouping together these very similar titles is appropriate for the comparison of incumbency to availability. For many job titles, the availability data that can be collected is limited, and the same data must be used for several related jobs. Therefore, grouping these related titles together is logical. Also, many job titles have so few incumbents in them that identifying disparities between incumbency and availability by job title is meaningless—as problem areas would be identified in terms of fractions of people. By grouping several similar titles and increasing the number of employees involved, a meaningful comparison can be conducted; any identified problem areas are more likely to be in terms of whole people. Consequently, goals established to correct problem areas are also more likely to be in terms of whole people.

The three reasons for grouping job titles all discuss "similar" or "related" jobs. That is the most critical guideline in creating job groups. Above all, the job titles placed into a job group must be more similar or related to each other than the job titles in other job groups.

Job groups must have enough incumbents to permit meaningful comparisons of incumbency to availability and goal setting. Ideally, if a job group is identified as containing a problem area, it should be large enough that a goal of a least one whole person can be established. No minimum size has been established for this purpose, however, since it is dependent not only on the size of the job group, but also on the size of the availability percentage and the number of minorities or women already employed in the job group.

The District did not combine job titles with different content, wages, or opportunities if doing so would have obscured problem areas (e.g., job groups which combine jobs in which minorities or women are concentrated with jobs in which they are underrepresented).

Each job group appears on a Job Group Report with a job group name and number. The report lists each job title in the job group. For each job title, the worksheet provides the following information: EEO reporting category, job title, employee headcounts for each job title, and overall percentages by gender and race/ethnicity as of June 30, 2012.

The seven EEO Job Groups appearing in the District's Affirmative Action Plan are listed below including the associated numerical code along with an explanation of that Job Group and examples of job titles falling within that Job Group.

The District defines job groups as follows:

Executive Level of Officials: Occupations in which employees set broad policies, exercise overall responsibility for execution of these policies, or direct individual departments or special phases of the District's operations. Includes: **General Manager, Deputy General Managers, Officers, Directors, Superintendents and most Managers.**

Professional Occupations: 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: **Program Administrators, Planners, Accountants, Analysts, some Managers, Supervisors, Vessel Masters and Engineers.**

Technician Occupations: 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: **IT Programmers, Dispatchers, Technicians, and some Supervisors.**

Protective Services: Occupations in which workers are entrusted with public safety, security and protection from destructive forces. Includes: **Lieutenants, Sergeants, and Patrol Officers.**

Clerical Occupations (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: **Office Assistants, Customer Service, Office Staff, Payroll, some Analysts, Coordinators, Toll Collectors and Storekeepers.**

Skilled Crafts Occupations: 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, Painters, Ironworkers, Electricians, Heavy Equipment Operators, Carpenters and Plumbers.**

Service Occupations: 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: **Bus Operators, Bridge Service Operators, Deckhands, Laborers, Bus Servicers and Terminal Assistants.**

The District does not have any employees in the Paraprofessional job group.

See Exhibit 3 for a copy of the Job Group Analysis

CHAPTER 7: COMPARING INCUMBENCY TO AVAILABILITY

"Availability" is an estimate of the proportion of each gender and race/ethnic group available and qualified for employment at the District for a given job group in the relevant labor market during the life of the AAP. Availability indicates the approximate level at which each race/ethnic and gender group could reasonably be expected to be represented in a job group if the District's employment decisions are being made without regard to gender, race, or ethnic origin. Availability estimates, therefore, are a way of translating equal employment opportunity into concrete numerical terms. Correct comparisons of incumbency to availability, worthwhile and attainable goals, and real increases in employment for problem groups depend on competent and accurate availability analyses. With valid availability data, we can compare the percentages of those who could reasonably be expected to be employed versus our current employment, identify problem areas or areas of deficiency, and establish goals to correct the problems.

Steps in Comparison of Incumbency to Availability

Identify Availability Factors

The following availability factors are required of grant recipients of the Federal Transit Administration of the United States Department of Transportation for consideration when developing availability estimates for each job group:

External Factor: The external requisite skills data comes from the 2000 Census of Population. The 2010 Census data is yet to be officially published. To the extent 2010 Census county population counts were available, that information was considered.

Local labor market area was based on an analysis conducted to identify the areas where applicants for regular employment with the District reside. The Local area was determined to be the seven counties of Sonoma, Marin, San Francisco, Contra Costa, Alameda, Solano and San Mateo

Reasonable labor area: Nationwide

Internal Factor: The percentage of minorities or women among those promotable, transferable, and trainable within the organization.

Weights were assigned to each factor for each job group, consistent with the relative geographic distribution of applicants, based upon their county of residence. A combination of historical data and experience were used to determine the weights. Weights were never assigned in an effort to hide or reduce problem areas.

Identify Final Availability:

Weights were multiplied by the component-specific data to produce weighted data for each component. Weighted data for each component was summed. This produced a final availability estimate for each gender and race/ethnic group, as well as for minorities in the aggregate. The District used Biddle Consulting Group, Inc. software for affirmative action planning to assist with the analysis for this years plan. Biddle Consulting Group, Inc. is well established EEO/AAP consulting organization.

See Exhibit 4 for Final Availability Reports

Incumbency to Availability:

Once final availability estimates were made for each job group, the District compared the percentage of incumbents in each job group to their corresponding availability. A comparison was made between the percentage employed as of June 30, 2012 and that group's final availability. The results of those comparisons are the basis for identifying underutilization, where applicable, for job groups and the establishment of a goal for that job group.

[See Exhibit 5 for the Comparison of Incumbency to Availability Reports](#)

CHAPTER 8: PLACEMENT GOALS AND TIMETABLES

The District has established a percentage annual placement goal whenever it found that minority or female representation within a job group was less than would reasonably be expected given their availability. In each case, the goal was set at the availability figure derived for women and/or minorities, as appropriate for that job group. These goals take into account the availability of basically qualified persons in the relevant labor area. They also take into account anticipated employment opportunities with our organization. The District believes these goals are attainable. These goals will be reached primarily through recruiting and advertising to increase the pool of qualified minority and female applicants and through implementation of our action-oriented programs. Selections will occur only from among qualified applicants. Goals do not require the hiring of persons when there are no vacancies or the hiring of a person who is less likely to do well on the job ("less qualified") over a person more likely to do well on the job ("better qualified"), under valid selection procedures. Goals do not require that the District hire a specified number of minorities or women.

Goals are not rigid and inflexible quotas which must be met, but are instead targets reasonably attainable by means of applying every good faith effort to make all aspects of the entire EEO/AAP work. A goal is a guidepost against which the District, a community group, or a compliance agency can measure progress in remedying identified deficiencies in the District's workforce. By setting realistic goals, based on expected vacancies and anticipated availability of skills within the relevant labor area, and using a job-related selection system, the District should be able to meet the goals, assuming it conducts effective recruitment and advertising efforts to ensure an adequate pool of qualified minority and/or female qualified applicants from which to make selections.

In establishing goals, the District considered the results which could reasonably be expected from putting forth every good faith effort to make our overall EEO/AAP work. Goals were not established that would exclude any gender or race/ethnic group. The District will not use goals to justify extending a preference to any individual, select an individual, or adversely affect an individual's employment status, on the basis of that person's race, color, religion, sex or national origin.

The District has established goals in the following areas: minorities in the Executive category; women in the Skilled Crafts category and women in the Service Occupations category.

[See Exhibit 6 for a copy of the Placement Goals Report](#)

CHAPTER 9: IDENTIFICATION OF PROBLEM AREAS

The phrases “comparison of incumbency to availability,” and “problem area” appearing in this chapter are terms the District is required by government regulations to use. The criteria used in relation to these terms are those specified by the government. These terms have no independent legal or factual significance. Although the District will use the terms in good faith in connection with its EEO/AAP, such use does not necessarily signify the District agrees that these terms are properly applied to any particular factual situation and is not an admission of non-compliance with EEO laws, regulations, and objectives. Whenever the term “goal” is used, it is expressly intended that it “should not be used to discriminate against any applicant or employee because of race, color, religion, gender, or national origin,” as stated in Title 41 Code of Federal Regulations, Part 60-2.16(e).

In addition to comparing incumbency to availability within job groups, the District has conducted studies to identify problem areas in each of its selection procedures (i.e., hires, promotions, and terminations). The District will continue to monitor and update these studies. In each case where potential problem areas are identified, affirmative action, as appropriate, will be taken consistent with any of the action-oriented programs described in Chapter 4 of this EEO/AAP. Goals are established within each job group at no less than the current availability data for the job group.

Workforce by Organizational Unit and Job Group

An analysis of minority and female distribution within each organizational unit was accomplished by a thorough investigation of the Workforce analysis.

See [Exhibit 2](#) for a copy of the Workforce Analysis by organizational unit.

An analysis of minority and female utilization within each job group was accomplished by a thorough investigation of the Comparison of Incumbency to Availability reports.

See [Exhibit 5](#) for a copy of the Comparison of Incumbency to Availability reports.

Personnel Activity

Applicant flow, hires, promotions, and terminations were analyzed by job group. An analysis of selection disparities in personnel activity between men/women and whites/minorities was accomplished by a thorough examination of transaction data.

See [Exhibit 7](#) for a copy of the Personnel Transaction Summary

Compensation Systems

Compensation analyses were conducted by comparing the salaries for men v. women, and whites v. minorities in each job title.

See [Exhibit 8](#) for a copy of the Compensation Analyses

CHAPTER 10: INTERNAL AUDIT AND REPORTING

Inherent in the EEO/AAP is the need for periodic assessment of problems encountered, corrective action taken and progress made. Assessment requires complex record keeping systems on applicants, employees, and components of the EEO/AAP itself. The objective of all record keeping systems to be implemented is to assess the results of past actions, trends, the appropriateness of goals and objectives, the appropriateness and relevancy of identified solutions to problems, and the adequacy of the EEO/AAP as a whole. In addition, a further objective is to identify the proper corrective actions to be made to all components.

Records are maintained for the purpose of updating the EEO/AAP, including revising the availability data and establishing triennial numerical goals. The District has designed and implemented an audit and reporting system that is used as the basis for evaluating results-oriented programs and affirmative action efforts.

The Employee Relations and Diversity Programs Administrator:

1. Measures the degree to which EEO/AAP program goals and objectives are being achieved;
2. Evaluates procedures for applicant tracking, employment recordkeeping, and other critical components of the EEO/AAP;
3. Conducts periodic reviews to ensure EEO/AAP problems are identified, corrective actions are implemented and progress is achieved in resolving any deficiencies;
4. Reviews report results with management and counsels on program effectiveness; and,
5. Works with management to guide them in attaining full EEO/AAP compliance.

CHAPTER 11: VETERANS AND PERSONS WITH DISABILITIES

Review of Personnel Processes

41.C.F.R. §§ 60-250.44(b); 60-741.44(b)

To ensure that all personnel activities are conducted in a job-related manner which provides and promotes equal employment opportunity for all known covered veterans and employees and applicants with disabilities, reviews are periodically made of the District's examination and selection methods to identify barriers to employment, training, and promotion.

The company ensures that its personnel processes do not stereotype disabled persons or veterans in a manner which limits their access to jobs for which they are qualified.

Physical and Mental Qualifications

41.C.F.R. §§ 60-250.44(c); 60-741.44(c)

To ensure that all physical and mental qualifications and requirements are job-related and promote equal employment opportunity for all known covered veteran and employees and applicants with disabilities, reviews are periodically made of the District's physical and mental qualifications and requirements as they relate to employment, training, and promotion to determine whether or not they are job-related and consistent with business necessity and safe performance on the job.

This process adheres to a methodology consistent with those specified in the *Uniform Guidelines on Employee Selection Procedures*, the requirements of the *Americans with Disabilities Act*, and the *EEOC's Technical Assistance Manual for the ADA*

Schedule for Review: Any previously reviewed classification will be reviewed again if there is a change in working conditions which affects the job's physical or mental requirements (e.g., new requirements, new equipment, etc.)

Reasonable Accommodation to Physical and Mental Limitations

41 C.F.R §§ 60-250.44(d); 60-741.44(d)

The District makes every effort to provide reasonable accommodations to physical and mental limitations of applicants and employees with disabilities or who are disabled veterans unless it can demonstrate that the accommodations would impose an undue hardship on the operation of business. The District will confidentially review performance issues of employees with known disabilities to determine whether a reasonable accommodation is needed when: 1) the employee is having significant difficulty with job performance, and 2) it is reasonable to conclude that the problem is related to the known disability. Employees may also contact Susan Spencer, Employee Relations and Diversity Programs Administrator, Phone: 415/257-4537, Email: sspencer@goldengate.org

Harassment

41 C.F.R. §§ 60-250.44(e); 60-741.44(e)

The District has developed and implemented a set of procedures to ensure that all of its employees are not harassed due to their protected class status. A copy of the District's Harassment Policy is posted on District Bulletin Boards. The District's brochure entitled, *Policy Against Harassment*, is distributed to new and existing employees upon initial hire and during harassment prevention training sessions.

Audit and Reporting System

41 C.F.R. §§ 60-250.44(h); 60-741.44(h)

The District has developed and currently implements an audit and reporting system that addresses the following:

1. Measures the effectiveness of the District's overall EEO/AAP and whether the company is in compliance with specific obligations.
2. Indicates the need for remedial action.
3. Measures the degree to which the District's objectives are being met.
4. Whether there are any undue hurdles for individuals with disabilities and other veterans regarding company sponsored educational, training, recreational, and social activities.

Responsibility for Implementation

41 C.F.R. §§ 60-250.44(i); 60-741.44(i)

See Chapter 3 for a complete description of implementation responsibilities.

Training

41 C.F.R. §§ 60-250.44(j); 60-741.44(j)

The District trains, and will continue to train, all employees involved in any way with the recruitment, selection, promotion, disciplinary actions, training, and related processes of individuals with disabilities or other veterans to ensure commitment to the District's stated EEO policies and Affirmative Action goals.

Compensation

41 C.F.R. §§ 60-250.21(i); 60-741.21(i)

It is the policy of the District that when offering employment or promotion to veterans or individuals with disabilities, the amount of compensation offered will not be reduced because of any disability income, pension, or other benefit the applicant or employee receives from another source.

CHAPTER 12: HOW TO FILE AN EEO/AAP COMPLAINT

Policy Statement for Equal Employment Opportunity

It is the policy of the District to provide equal employment opportunity for all qualified persons in accordance with state and federal laws prohibiting discrimination based on race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, genetic information, marital status, sex, gender, gender identity, gender expression, age, sexual orientation or military experience, or participation in a protected activity such as organized labor or an internal investigation; or any other basis protected by federal, state or local law. The District ensures that employment practices involving recruiting, selection, promotions, terminations, transfers, layoffs, compensation, training, benefits and other terms and conditions of employment are made in a nondiscriminatory manner.

The District makes employment decisions based on individual qualifications and other non-discriminatory business reasons. The District prohibits retaliation against any employee or applicant for bringing a complaint of discrimination pursuant to this policy. This policy also prohibits retaliation against a person who assists someone with a complaint of discrimination or participates in any manner in an investigation or resolution of a complaint of discrimination. Retaliation includes threats, intimidation, reprisals, and other adverse employment related actions.

The District is an affirmative action/equal opportunity employer. This means the District takes affirmative steps to ensure equal employment opportunity for minorities, women and persons with disabilities. The District also complies with the American's with Disabilities Act (ADA) requiring reasonable accommodation for applicants and employees, as needed. The District also ensures that its newly constructed facilities comply with the ADA.

Responsibility for the implementation of the Equal Employment Opportunity policies and Affirmative Action plan (EEO Programs) rests with the District's Employee Relations Office. However, all Deputy General Managers (DGMs), directors, department managers, administrators and supervisors are responsible for carrying out the EEO Programs within their respective department(s). The Board of Directors expects the General Manager and each DGM, director, manager, administrator, supervisor and employee to ensure compliance with the EEO Programs.

Discrimination Complaints

All employees, represented and non-represented, may consult with District management or the Employee Relations Office concerning any issue or incident which the employee believes may involve discrimination on the basis of any protected category. District representatives will endeavor to respect a complaining employee's desire for confidentiality but must be free to act when facts suggest a violation of this policy has occurred.

When an employee believes this policy has been violated, the employee should submit a formal written complaint and consult directly with the District's Employee Relations Office (415) 257-4537 or the Human Resources Director (415) 257-4521 within sixty (60) calendar days of the incident.

Resolution Procedures

The resolution of discrimination complaints will be conducted in accordance with either of the following procedures:

A. **Informal Procedure for Resolution**

The Employee Relations Office or Human Resources Director, or his or her designee may explore informal resolution of a discrimination complaint at the lowest level and, when necessary, conduct a fact-finding investigation concerning any complaint which the employee believes may involve issues of discrimination.

B. **Formal Procedure for Resolution**

Formal complaints must be presented in writing to the Employee Relations Office. The written complaint must include the complainant's name, division, department, position, basis of the discriminatory complaint, and the names and positions of individuals involved in the complaint, including witnesses.

- i. Following receipt of a written complaint, a District representative will meet with the employee to review the discrimination allegation(s) to ensure that the information is accurately stated and understood. During this interview, the basis of the complaint and supporting evidence should be fully communicated. Such an investigation may include interviews with all parties named by the complainant as wholly or partially responsible for the alleged discriminatory acts as well as any witnesses. Investigations may also include the review and analysis of relevant personnel records and employee statistics. If appropriate, courses of action for an expedient resolution of the complaint will be developed by the District representative and the complainant.
- ii. If the District representative determines that there are no issues of discrimination involving one or more of the protected categories, he or she will inform the employee, the manager and the department Deputy General Manager.
- iii. If the District representative determines that there has been a violation of this policy, he or she will present a written determination supporting the validity of the complaint to the General Manager with a recommendation for corrective action which may include discipline up to termination and/or alternative dispute resolution. If alternative dispute resolution is recommended, it will be conducted within 120 calendar days of the District representative's written determination to the General Manager.
- iv. The General Manager shall review the record and issue a final determination which may include discipline up to termination.

I. **PERSONS AFFECTED**

All employees – this includes represented and non-represented employees.

II. **DEFINITIONS**

Affirmative Action is an active approach to recruiting, hiring and promoting qualified candidates based on factors that relate to skill, knowledge and fitness for employment in accordance with Equal Employment Opportunity and Americans with Disabilities guidelines. This approach eliminates the artificial barriers to employment and assures equal opportunity for all persons regardless of protected category/class.

Equal Employment Opportunity Program

Protected Categories/Classes are defined by law as race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, genetic information, marital status, sex, gender, gender identity, gender expression, age, sexual orientation or military experience, or participation in a protected activity such as organized labor or an internal investigation; or any other basis protected by federal, state or local law

III. **RESPONSIBILITIES/PROCEDURES**

Employee Responsibilities:

- A. Employees must immediately report discrimination to their manager, Employee Relations Office, Human Resources Director or any Deputy General Manager.
- B. Employees must cooperate in investigations and answer all questions truthfully and to the best of his or her knowledge.
- C. Employees requesting a disability-related workplace accommodation should communicate the need to their manager, the Employee Relations Office, the Leave Administrator or the Human Resources Director. (See **Disability and Reasonable Accommodation Policy**)
- D. Employees with questions about workplace discriminations should contact the Employee Relations Office at (415) 257-4537, the Director of Human Resources at (415) 257-4521, or the Deputy General Manager/Administration and Development at (415) 257-4580.

Management Responsibilities:

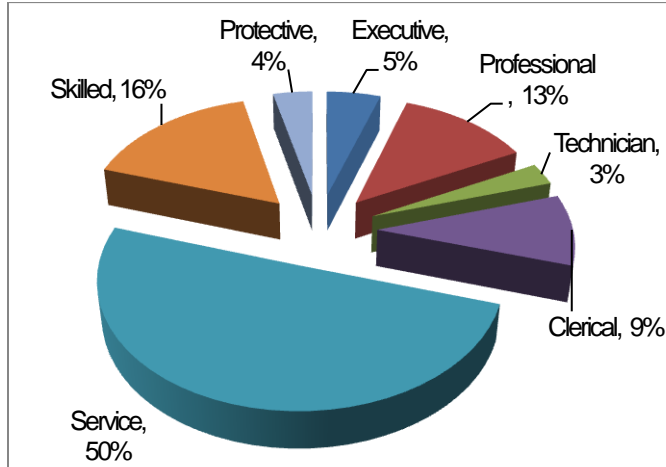
- A. Managers shall notify the Employee Relations Office upon receipt of allegations of workplace discrimination.
- B. Managers shall ensure compliance with the EEO Programs within their respective department(s).

District Responsibilities:

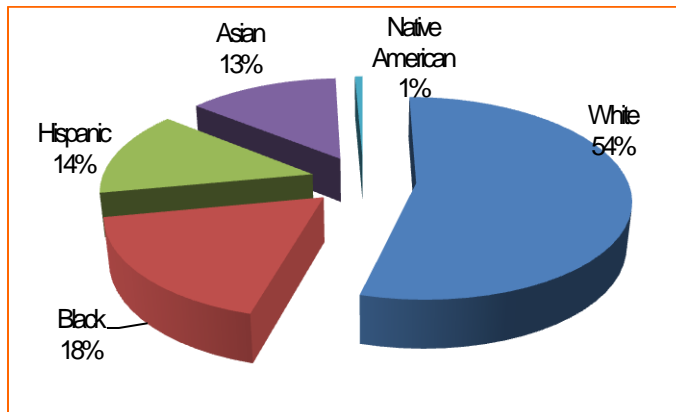
- A. The Employee Relations Office shall investigate allegations of workplace discrimination and attempt to resolve complaints following informal and/or formal resolution procedures.
- B. The Employee Relations Office will ensure compliance with EEO Programs.
- C. The General Manager shall make a final determination as to any corrective action for violations of this policy.
- D. The General Manager will ensure compliance with EEO Programs.

CHAPTER 13: SUMMARY OF UTILIZATION REPORTS

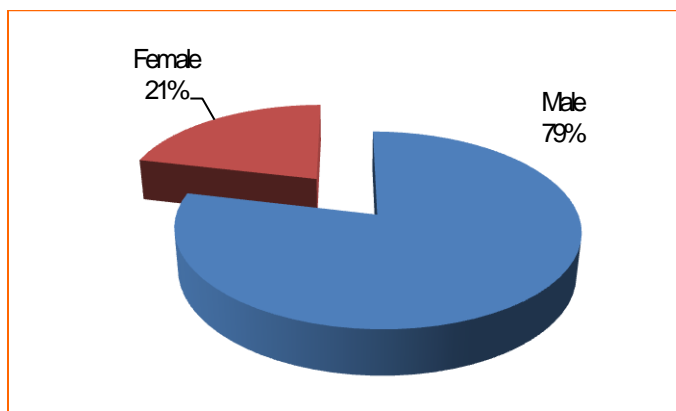
CURRENT REGULAR EMPLOYEE POPULATION BY JOB GROUP:



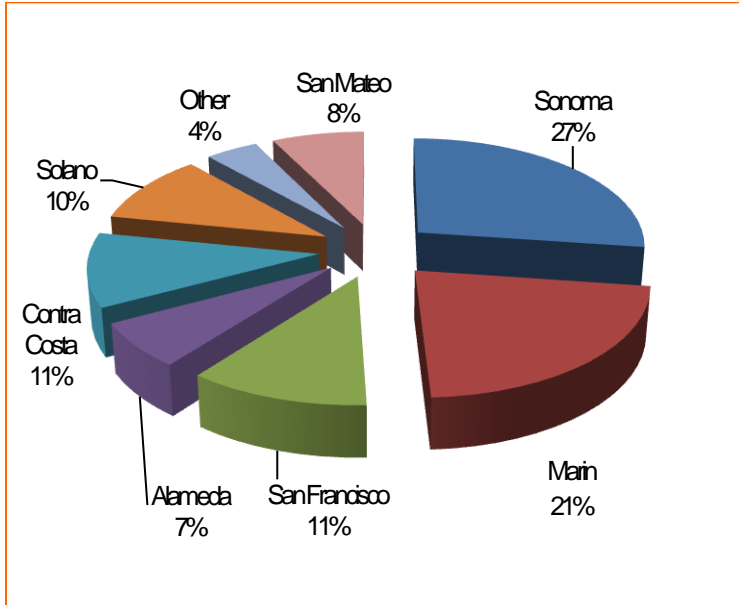
CURRENT REGULAR EMPLOYEE POPULATION BY RACE:



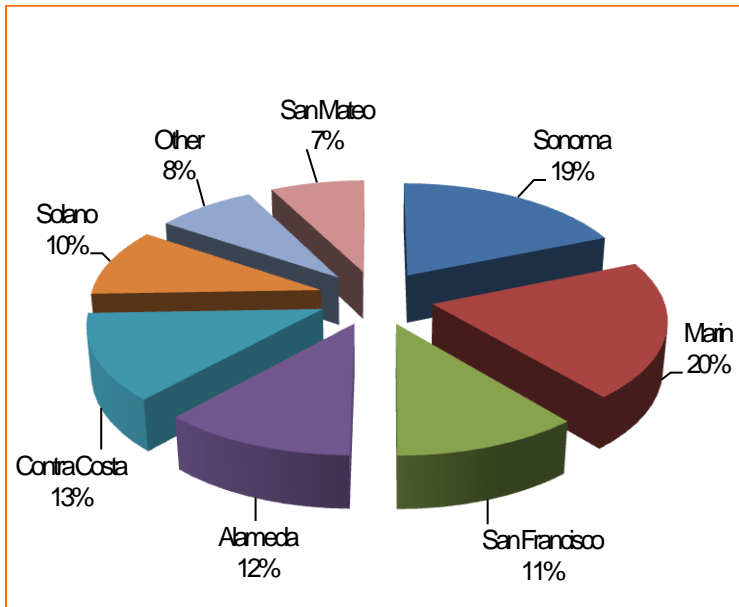
CURRENT REGULAR EMPLOYEE POPULATION BY GENDER:



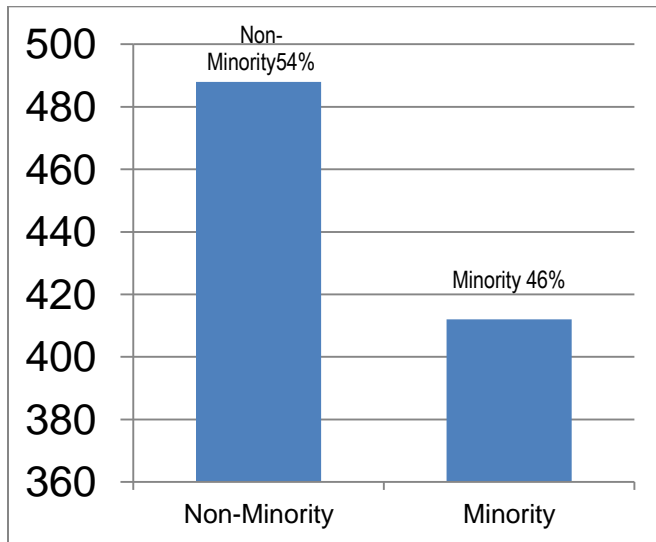
CURRENT REGULAR EMPLOYEE POPULATION BY RESIDENCE:



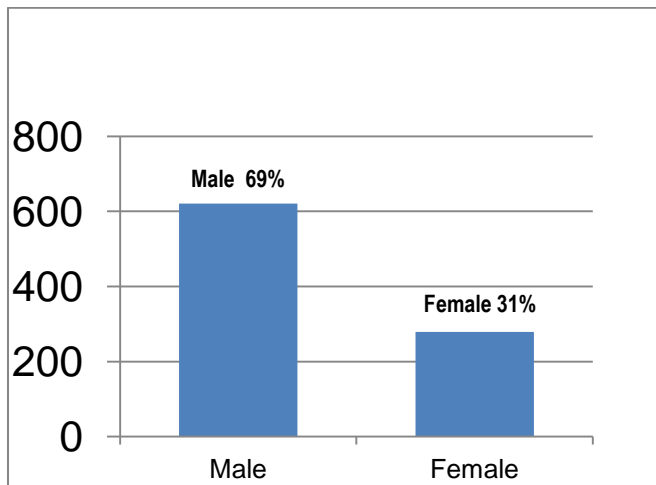
APPLICANTS BY RESIDENCE:



APPLICANTS BY RACE:



APPLICANTS BY GENDER:



SUMMARY OF GOALS:

Golden Gate Bridge Highway & Transportation District
GOLDEN GATE BRIDGE DISTRICT
Placement Goals Summary

Snapshot Date: 07/31/2012

Test: 80% Rule with Whole Person

Job Group	Gender / Race Groups	Employees (#)	Employees (%)	Availability (%)	Establish Goal? Yes / No	Placement Goal #	Utilization Test #	Test Result
1 - Executive <i>Total Employees: 37</i>	Females	12	32.43%	32.90%	NO	1	0	N/A
	Minority	6	16.22%	24.30%	YES	3	1	N/A
2 - Professionals <i>Total Employees: 91</i>	Females	34	37.36%	33.30%	NO	0	0	N/A
	Minority	26	28.57%	26.40%	NO	0	0	N/A
3 - Technician <i>Total Employees: 21</i>	Females	11	52.38%	45.20%	NO	0	0	N/A
	Minority	9	42.86%	30.90%	NO	0	0	N/A
4 - Protective Services <i>Total Employees: 27</i>	Females	3	11.11%	16.40%	NO	2	0	N/A
	Minority	13	48.15%	39.90%	NO	0	0	N/A
6 - Clerical <i>Total Employees: 68</i>	Females	49	72.06%	53.60%	NO	0	0	N/A
	Minority	39	57.35%	32.40%	NO	0	0	N/A
7 - Skilled <i>Total Employees: 120</i>	Females	3	2.50%	4.60%	YES	3	1	N/A
	Minority	37	30.83%	37.40%	NO	8	0	N/A
8 - Service <i>Total Employees: 368</i>	Females	44	11.96%	29.30%	YES	64	42	N/A
	Minority	207	56.25%	44.80%	NO	0	0	N/A

Eighty-Percent (80%) Plus Whole Person Rule – Underutilization is declared if the ratio of the incumbent percentage to the final availability is less than 80% AND the expected number of the at issue group exceeds the actual number by at least one whole (1.0) person. Placement Goal # indicates the number needed to reach Availability.