



**CITY OF FAYETTEVILLE**  
**FAYETTEVILLE AREA SYSTEM OF TRANSIT**  
**EQUAL EMPLOYMENT OPPORTUNITY (EEO)**  
**PROGRAM**

MARCH 1, 2024 - FEBRUARY 29, 2028



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# FACILITY IDENTIFICATION STATEMENT

EQUAL EMPLOYMENT OPPORTUNITY PROGRAM

FOR

City of Fayetteville  
Fayetteville Area System of Transit (FAST)  
505 Franklin Street  
Fayetteville, NC 28301

CITY OF FAYETTEVILLE DUN & BRADSTREET NUMBER: **040-03-1700**

INCLUSIVE DATES OF THE EEO: MARCH 1, 2020 - JUNE 30, 2023

EEO Officer: Yamile Nazar

Title: Human Relations Director

Telephone: (910) 433-1697

E-mail Address: [yamilenazar@fayettevillenc.gov](mailto:yamilenazar@fayettevillenc.gov)

Read and approved by:

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CHIEF EXECUTIVE: Douglas Hewett, ICMA-CM

TITLE: City Manager, City of Fayetteville

## **INTRODUCTION**

This report outlines the Equal Employment Opportunity (EEO) Plan of the Fayetteville Area System of Transit (FAST), a department of the City of Fayetteville (COF), developed in accordance with the Federal Transit Administration (FTA) Circular 4704.1A effective October 31, 2016 (Rev. 1, April 20, 2017) (“Circular”). This report is provided as documentation of compliance with the Title VII Civil Rights Act of 1964, as amended, which prohibits employment discrimination on the basis of:

- Race
- Color
- Sex (Including Pregnancy)
- National Origin
- Creed
- Religion
- Retaliation

## **EEO PROGRAM PURPOSE**

The EEO Program is a detailed, results-oriented set of procedures designed to achieve prompt and full utilization of minorities and women at all levels and in all parts of the organization’s workforce. FAST is required to submit this document to FTA every four (4) years.

The purpose of the EEO is to:

- Establish strong company policy and commitment to EEO.
- Assign responsibility and authority for the program to top company officials.
- Analyze present workforce to identify jobs and departments where minorities and females are underrepresented.
- Set specific measurable hiring and promotion goals with target dates in each area of underutilization.
- Make every manager and supervisor responsible and accountable for helping to meet these goals.
- Re-evaluate job descriptions and hiring criteria to ensure that they include only actual job needs.
- Find minorities and females who qualify or can become qualified to fill goals.

## **HOW TO FILE A COMPLAINT**

If you believe you have been discriminated against under the Title VII Civil Rights Act based on EEO, you have a right to file a complaint up to one-hundred and eighty (180) days from the date

of the alleged discrimination. The complaint must be in writing and shall include, at minimum, the following information:

- Name, address and contact information (i.e. telephone number, mailing address, email address, etc.).
- Details of how, when, where and why you believe you were discriminated against.
- Name and contact information of any witnesses.

A Title VII complaint form is available on [www.RideFAST.net](http://www.RideFAST.net), or can be requested by calling (910) 433-1747. A complaint may be sent by mail to:

**Fayetteville Area System of Transit**  
**EEO Coordinator**  
505 Franklin Street  
Fayetteville, NC 28301

You may also send this information by email to [FAST@fayettevillenc.gov](mailto:FAST@fayettevillenc.gov). Please indicate “Attention EEO Coordinator” in the subject line.

In addition to filing a Title VII complaint with FAST, complainants may also file a Title VII complaint with the following agencies:

**City of Fayetteville**  
**Human Relations Director / EEO Officer**  
433 Hay Street  
Fayetteville, NC 28301

**North Carolina Department of Transportation**  
**Office of Equal Opportunity & Workforce Services**  
External Services Section  
1511 Mail Service Center  
Raleigh, NC 27699

**Federal Transit Administration**  
**Office of Civil Rights**  
East Building, 5th Floor – TCR  
1200 New Jersey Ave., SE  
Washington, DC 20590

**The U.S. Equal Employment Opportunity Commission**  
**Raleigh Field Office**  
434 Fayetteville Street, Suite 700  
Raleigh, NC 27601-1701

Title VII complaints are investigated by the City's Human Relations Department in accordance with the City's discrimination complaint procedures.

***NOTICE:***

*Complainants are encouraged to send all written correspondence through the U.S. Postal Service via certified mail in order to ensure that documents are easily tracked. If complainants choose to submit complaints by facsimile and/or email, an original, signed copy of the complaint must be mailed to the EEO Coordinator, as soon as possible, but no later than 180 days from the alleged date of discrimination.*

## **PROGRAM REQUIREMENTS**

The program requirements of this report contain EEO/AA plan components as required in Chapter II of FTA Circular 4704.1A. This section includes the following required program components:

- I. Statement of Policy**
- II. Dissemination Plan**
- III. Designation of Personnel Responsibility**
- IV. Utilization Analysis**
- V. Goals and Timetables**
- VI. Assessment of Employment Practices**
- VII. Monitoring and Reporting**

## STATEMENT OF POLICY

Fayetteville Area System of Transit's (FAST) mission is to improve the quality of life by connecting Fayetteville's residents, workers, visitors, and places with a highly-valued safe, efficient, reliable and innovative transportation. We strive to create a professional environment reflecting the Fayetteville community in which we serve. FAST is committed to ensuring that no person is excluded from participation in, or denied the benefits of, employment opportunities (including but not limited to, recruitment, hiring, selection for training, promotion, transfer, demotion, layoff, termination, rates of pay or other forms of compensation) 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.

FAST does not tolerate retaliation or adverse action against employees or candidates who file a charge or complaint against FAST for alleged discrimination. Charges or complaints including, but not limited to, participation in an employment discrimination proceeding (such as an investigation or lawsuit) or otherwise engagement in protected activity will be thoroughly investigated.

FAST is committed to providing reasonable accommodations to candidates and employees who need them because of a disability or to practice or observe their religion, absent undue hardship. The success of FAST's EEO Program is the responsibility of all FAST employees. To ensure this all FAST staff will be responsible for the specific portions of this plan to assure compliance is achieved. Our managers and supervisors all understand that their contribution to this plan will be measured in the same manner that other city and department goals are evaluated.

In an effort to be compliant with all state and federal requirements, FAST is committed to developing a written, nondiscriminatory, EEO Program that includes goals and timetables which align with our overall goals. The guidelines and objectives contained in this plan are designed to assist FAST and all of its employees adhering to this policy.

As I am the overseer for FAST's EEO Policy and Program, my overall responsibility and accountability is to ensure that our EEO Officer and EEO Coordinators both have direct access to me and acts with my authority on all levels. Both our EEO Officer, Yamile Nazar ([yamilenazar@fayettevillenc.gov](mailto:yamilenazar@fayettevillenc.gov)) \ (910) 433-1697 and EEO Coordinator, Tiera Daugherty ([tieraougherty@fayettevillenc.gov](mailto:tieraougherty@fayettevillenc.gov)) \ (910) 433-1157, will ensure the day-to-day management, including EEO program preparation, monitoring and complaint investigation.

We pride ourselves in being an attractive, culturally diverse, and inclusive city that is safe, prosperous, innovative, and unified. In order for us to ensure a positive environment within our organization and community, we will hire and provide advancement opportunities for candidates and employees within the above identified classifications and minimize or eliminate impediments which may deny advancement to those individuals.

This program will be updated as necessary and in compliance with state and federal requirements and those specifically of the Federal Transit Administration (FTA)

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Douglas Hewett

Date

City Manager, ICMA-CM



## **I. DISSEMINATION**

FAST has established various channels of communication to ensure that employees and the community are aware of its commitment to FAST's EEO Program by educating persons responsible for its administration, employees, recruitment sources, subcontractors, vendors, suppliers, and the community. FAST widely publicizes and disseminates its EEO Policy Statement and associated documents in both print and electronic formats.

### **Internal Dissemination**

1. FAST's EEO Statement of Policy, signed by the Chief Executive, is disseminated throughout the organization in both print and electronic formats.
2. FAST's EEO Statement of Policy, along with federal and state labor law notices, are conspicuously displayed in common workspaces throughout FAST facilities.
3. FAST's EEO Statement of Policy is included in the employee handbook, personnel manual and reports.
4. FAST's EEO Statement of Policy and Plan is available on the CoF intranet and posted on FAST website.
5. The EEO Coordinator will meet with FAST's Leadership Team at least quarterly to discuss the EEO Program and its implementation.
6. An annual EEO refresher training will be held for all FAST employees to seek input on the programs implementation. All employees will sign an EEO training acknowledgement form indicating they have been trained on FAST's EEO Program.
7. FAST ensures that all new supervisors and managers are trained within 90 days of their appointment.

### **External Dissemination**

FAST is committed to utilizing whatever means necessary to convey the organizations commitment to equal opportunity employment. The dissemination of FAST's EEO Program includes, but is not limited to:

1. Recruitment and employment agencies, educational institutions and community organizations that refer candidates to FAST.
2. All recruitment advertisements, to include printed/electronic media and online jobs postings indicating FAST "is an equal opportunity employer."
3. Accessibility on FAST's website.

## **II. DESIGNATION OF PERSONNEL RESPONSIBILITY**

FAST believes that Equal Employment is an organizational responsibility, therefore, implementing and ensuring the compliance of this program is a collaborative effort between

several departments. The importance FAST places on the EEO Program is reflected by our Chief Executive Doug Hewett's commitment as indicated in FAST's EEO Statement of Policy.

**Chief Executive – Doug Hewett, City Manager**, is responsible for overseeing and ensuring FAST's EEO Program is adhered to and receives the highest level of priority. The Chief Executive's responsibilities include, but are not limited to:

1. Total commitment to FAST's EEO Program goals and objectives.
2. Appointing the EEO Officer who will administer and adhere to the provisions of FAST's EEO Program.
3. Delegating the responsibility of the EEO Program to ensure all designated personnel comply accordingly.
4. Overseeing periodic audits to ensure all aspects of employment as a means to identify and remove barriers obstructing the achievement of specified goals and objectives.

**EEO Officer – Yamile Nazar, Human Relations Director**, has been appointed by the Chief Executive as FAST's EEO Officer and has the primary responsibility to ensure full compliance of the programs goals and objectives. The responsibilities of the EEO Officer include, but are not limited to:

1. Total commitment to FAST's EEO Program goals and objectives.
2. Advising and conducting EEO training and professional development opportunities for all employees.
3. Designing, implementing and maintaining an internal audit and reporting system that will 1.) measure the effectiveness of FAST's programs; 2.) determine where progress has been made; 3.) identify the need for corrective action; 4.) ensure compliance information is posted and up-to-date.
4. Serving as a liaison between FAST; Federal, state, county and local governments, regulatory agencies, community groups representing minorities, women, persons with disabilities and others.
5. Investigating employment discrimination complaints.

**EEO Coordinator – Tiera Daugherty, Civil Rights Program Analyst**, serves as FAST's EEO Coordinator and has the primary responsibility to ensure compliance of the programs goals and objectives. The responsibilities of the EEO Coordinator include, but are not limited to:

1. Total commitment to FAST's EEO Program goals and objectives.
2. Creating and administering FAST's EEO Statement of Policy and Program.
3. Assisting in identifying potential problem areas to establish agency and unit goals and objectives.
4. Reviewing FAST's nondiscrimination plan with all managers and supervisors to ensure the policy is understood.
5. Assisting management in collecting and analyzing employment data, identifying problem areas, setting goals and timetables, and developing programs to achieve goals.
6. Reporting semi-annually to the Chief Executive on the goals and progress of the EEO Program.

7. Providing direction to the Human Resource Development regarding: 1.) recruitment and promotions; 2.) complaint policies; 3.) reasonable accommodation policies; 4.) performance evaluations; 5.) grievance procedures and; 6.) concurring in all employment practices policies.
8. Assuring that current legal information affecting EEO is disseminated to responsible officials.

**Human Resource Development Director - Sherman Clipp**, oversees, but is not limited to:

1. Employment discrimination complaints received by the Human Resources Consultants and notification to the EEO Officer of all discrimination complaints received.
2. Ensuring that no barriers exist which preclude equal opportunity in hiring, promotion, training and career growth opportunities.
3. Orientation of new employees where they are provided and read the EEO Statement of Policy during New Employee Orientation.

### **Agency EEO Responsibilities**

All FAST supervisors, managers and City officials are responsible for ensuring the implementation of FAST's EEO Program and assuring that discrimination, of any kind (based on a protected class) is eliminated. The responsibilities of these personnel include, but is not limited to:

1. Participating in periodic audits of all aspects of employment and remove barriers obstructing the achievement of specified goals and objectives.
2. Maintaining a reporting database of personnel records and meeting with employees and City officials regularly to ensure personnel have a clear understanding of FAST's policies and procedures.
3. Participating in the review and/or investigation of complaints alleging discrimination.
4. Conducting/Supporting career advancement opportunities for all employees.

## **III. UTILIZATION ANALYSIS**

As part of the EEO Program requirements, FAST conducted a Utilization Analysis to identify job categories where there is underutilization and/or overconcentration of certain demographic groups within FAST's workforce in comparison to their availability in the relevant labor market. It is also used to establish a set of goals and timetables to address any underutilization and/or overconcentration.

FAST's Utilization Analysis consists of a workforce analysis and an availability analysis. The workforce analysis provides a statistical breakdown of FAST's workforce by EEO-4 job categories, cross-referenced by gender and race/ethnicity. The availability analysis draws from US Bureau statistics on the demographics of the availability workforce, primarily in the Cumberland County area, for each specified job category. Based on a comparison between the demographic profile of FAST's workforce and the available workforce in the Cumberland County area, this analysis identified areas of underutilization and overconcentration. These figures were used as a baseline from which the timetables were developed.

<b>Job Group</b>	<b>EEO Job Category</b>	<b>Total Number of FAST Employees per EEO Job Category</b>
1	Officials and Administrators	3
2	Professionals	6
3	Technicians	0
4	Protective Service Workers	0
5	Paraprofessionals	13
6	Administrative Support Workers	16
7	Skilled Craft Workers	18
8	Service Maintenance Workers	124

**Workforce Analysis**

FAST’s workforce data is a compilation of all full-time, part-time, permanent and temporary FAST employees captured in the dataset for this Utilization Analysis. Contractors, including security personnel, are not included in this data. The CoF assigns similar or related job titles to job groups that mirror the EEO-4 job categories for reporting purposes.

**Availability Analysis**

FAST’s Availability Analysis (APPENDIX A) utilized availability data from the US Census Bureau’s 2014-2018, American Community Survey. The analysis employs the EEO State and Local Government Job Groups by gender and race/ethnicity for Worksite Geography data tables. This is the most recent source of EEO tabulation data by State and Local Government job groups. FAST selected to use the entire United States as the appropriate labor market for the Officials and Administrative job categories. The CoF sources candidates from throughout the US for its executive management positions due to relatively small pools of people who qualify to take on these senior management roles.

The availability data is input into the Utilization Analysis and required for all job categories as well as the racial/ethnic subcategories for men and women. The results of the analysis will identify any underutilization or over-concentrated subcategories in specific job classes.

**Findings**

**Total Workforce and Availability Analysis**

FAST's total workforce, from March 1, 2020, through June 30, 2023, comprised of 180 employees. This figure includes all full-time, part-time, permanent and temporary employees. Of the total workforce, 89 employees were male, composing of 49.4% of FAST's workforce. 91 employees were female, representing 50.4% of the workforce. 143 employees were minorities, composing of 79.4% of the workforce. 37 employees were Caucasian, representing 20.5% of the workforce (Figure 1 and Figure 2).

Composing a total of 70.5% of FAST's workforce, African Americans (127) are highly represented throughout the department in various EEO-4 job categories. African Americans were most highly represented in the Service Maintenance category (83%). Administrative Support category (68.7%) and Paraprofessional category (83.3%).

Seven (7) Hispanic/Latino males/females worked at FAST during the reporting period. Combined, Hispanic and Latinos made up (3.8%) of the department's workforce. Hispanic/Latino males were underutilized in one Job Category.

Employees of Two or More Races represented 3.3% of the workforce and were underutilized in the Service Maintenance category (-1%). During the reporting period, FAST only had one (1) Asian or Pacific Islander employee and two (2) American Indian/Alaskan Native employees (1.1% of total workforce). Since these groups make up a very small percentage of the available workforce in the Cumberland County area, none of these groups were underrepresented in FAST's workforce.

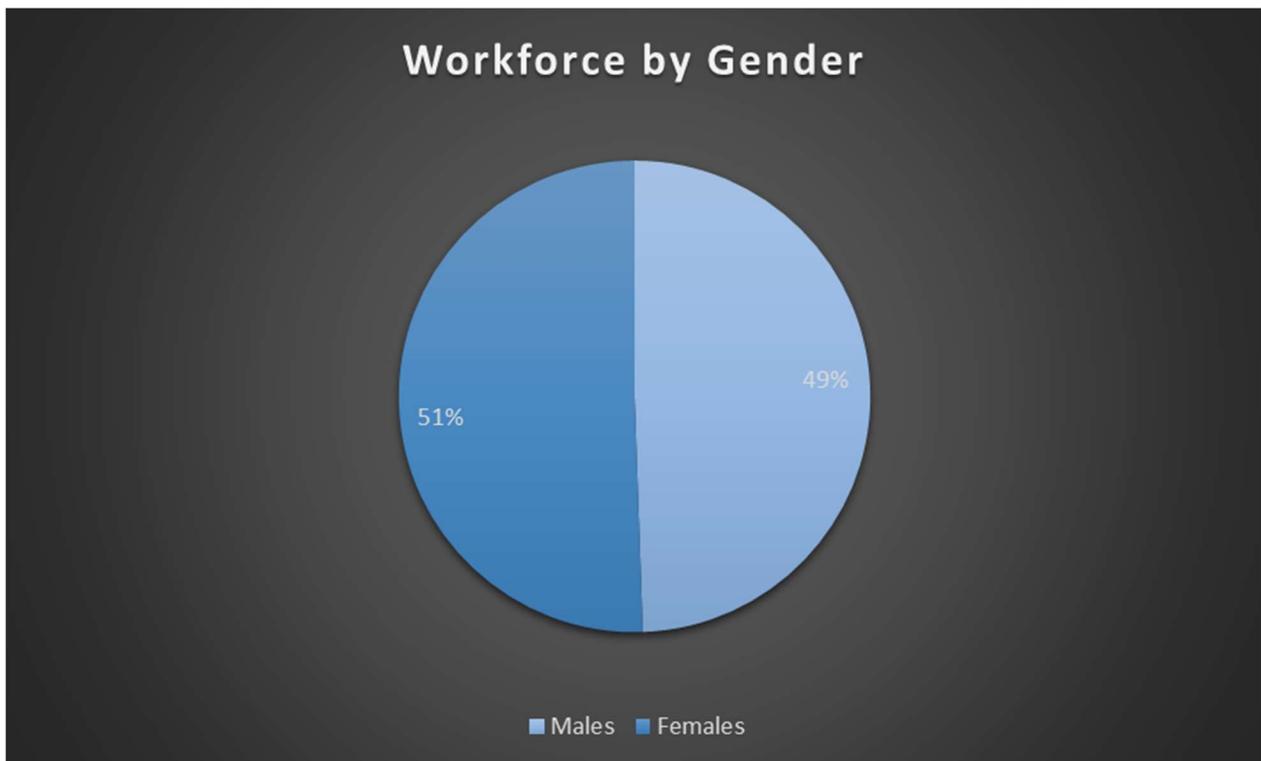


Fig. 1 FAST Snapshot from March 1, 2020- June 30, 2023

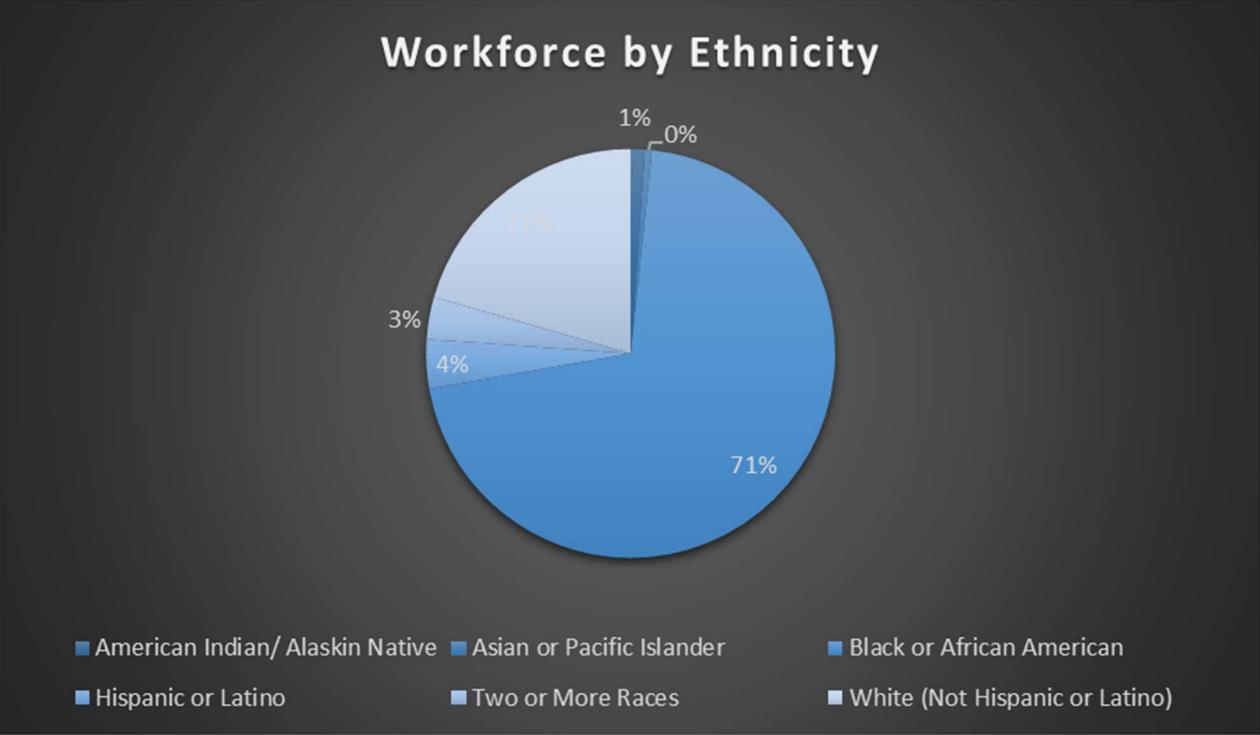


Fig. 2 Workforce Snapshot from March 1, 2020- June 30, 2023

**Job Category 1 - Officials and Administrators**

The Officials and Administrators job category consists of three (3) employees with annual salaries ranging from approximately \$71,000 to \$130,000. Of these three (3) employees, one (1) (33.3%) is male and two (2) (66.6%) are female. All three (3) (100%) are minorities.

There are no underutilized groups in the Officials and Administrators job category.

**Job Category 2 - Professionals**

The Professionals job category consists of five (5) employees with annual salaries ranging from approximately \$52,000 to \$71,000. Of these five (5) employees, one (1) (20%) is male and four (4) (80%) are female. One (1) (20%) is a minority and four (4) (80%) are Caucasian.

There are no underutilized groups in the Professionals job category.

**Job Category 3 - Technicians**

No data to report for this job category.

**Job Category 4 - Protective Services**

No data to report for this job category.

**Job Category 5 - Paraprofessionals**

The Paraprofessionals category consists of 12 employees with annual salaries ranging from approximately \$52,000 to \$71,000. Of these employees, four (4) (33.3%) are male and eight (8) (66.6%) are female. Nine (9) (75%) are minorities and three (3) (25%) are Caucasian.

There are no underutilized groups in the Paraprofessionals job category.

### **Job Category 6 - Administrative Support**

The Administrative Support category consists of 16 employees with annual salaries ranging from approximately \$37,000 to \$50,000. Of these 16 employees, two (2) (12.5%) are male and 14 (87.5%) are female. 13 (81.2%) are minorities and six (6) (23%) are Caucasian.

There are no underutilized groups in the Administrative Support job category.

### **Job Category 7 - Skilled Craft**

The Skilled Craft category consists of 17 FAST employees with annual salaries ranging from approximately \$36,000 to \$83,000. All 17 (100%) are male. 10 (58.8%) are minorities and seven (7) (41.2%) are Caucasian.

There are no underutilized groups in the Skilled Craft job category.

### **Job Category 8 - Service Maintenance**

The Service Maintenance consists of 124 employees with annual salaries ranging from approximately \$36,000 to \$83,500. Of these seven (7) employees, 60 (48.4%) are male and 64 (52.6%) are female. 105 are minorities and 18 (14.5%) are Caucasian.

There are six (6) protected class groups underutilized in the Service Maintenance category. These include Hispanic/Latino Males (-15%), Asian Males (-2%), Two or More Races Males (-8%), Caucasian Females (-17%), Hispanic/Latino Females (-10%) and Asian Females (-1%).

<b>Demographic</b>	<b>Underutilization</b>
Hispanic/Latino Males	15%
Asian Males	2%
Two or More Races Males	8%
Hispanic/Latino Females	10%
Caucasian Females	17%
Asian Females	1%

## **IV. GOALS AND TIMETABLES**

FAST's EEO efforts are directed toward achieving gender and minority representation in all job categories which is equivalent to the available workforce in Cumberland County. Goals and

timetables are excellent management tools that assist in optimum utilization of human capital. Specific and detailed percentages and numerical goals, with timetables, must be set to correct any underutilization of specific affected classes of persons identified in FAST’s Utilization Analysis. In establishing placement goals, FAST applied the following principles:

1. When the percentage of minorities or women employed in a job category was less than would reasonably be expected given the availability percentage in that job category, FAST established a percentage placement goal using statistically significant methods (the Whole-Person Rule). This goal considers the availability of qualified persons in the local labor market and the anticipated employment opportunities with FAST.
2. The awareness of underutilization within FAST’s workforce (as identified in the EEO Program) is not a basis for pre-determining employment of candidates in particular job categories. Placement goals, as indicated on the Utilization Analysis, are determined as a result of the breakdown of job category, ethnicity and gender, where underutilization occurred and the number of persons needed to eliminate such.
3. A candidate’s employment status is not determined or affected by the candidate’s race, color, religion, sex, age, disability, veteran status or national origin. In all employment decisions, FAST makes selections in a nondiscriminatory manner as placement goals do not provide a justification to extend a preference to/selection of any candidate in a discriminatory manner.
4. FAST does not utilize placement goals as a determining factor to select candidates in specific job categories nor are they intended to achieve proportional representation or equal results. FAST also does not hire a less qualified candidate in preference to a more qualified candidate as FAST believes that, by making a good faith effort ensuring all aspects of our EEO Program are implemented, we will achieve our placement goals. FAST’s placement goals remain attainable given intentional recruitment efforts, marketing and outreach targeted towards action-oriented programs which will, in turn, increase a diverse pool of qualified candidates.

**2020 EEO Program Progress Against Goals**

<b>FAST’s Workforce Overview</b>			
<b>Year</b>	<b>Total Workforce</b>	<b>Males</b>	<b>Females</b>
<b>2020</b>	225	105	120
<b>2023</b>	180	89	91

<b>FAST Workforce by Race and Ethnicity</b>		
	<b>2020</b>	<b>2023</b>
African American	76.4%	70.5%
Caucasian	16.4%	20.5%
Hispanic and Latino	0.4%	3.8%
Asian	0.4%	0.5%
American Indian	0.4%	1.1%
Native Hawaiian and Other Pacific Islanders	0.0%	0.0%
Two or More Races	2.2%	3.3%

### **Short-Term Placement Goals**

FAST’s Short-Term Placement Goals are established to address the immediate actions required to achieve our Long-Term Placement Goals. The Short-Term Goals are set in increments of one (1) year and aligned with FAST’s fiscal year objective setting process. These objectives include but are not limited to the following:

- Internal in-depth organizational review and assessment of all departmental policies, programs, practices, processes and systems to identify potential impediments to a highly effective EEO Program and identification of root cause issues and solutions.
- Identifying and implementing systems and processes that support sustainable plans and changes.

FAST has established short-term and long-term efforts to correct the areas of individual gender and racial and ethnic underutilization in our EEO job categories and additionally increase diversity in our candidate pool. Our commitment to EEO efforts is continuous.

### **Long-Term Placement Goals**

These long-term goals are established for achievement in each of the specified job categories in a four-year period:

#### **1. Officials and Administrators**

A. Based on the analysis, there is no underutilization of statistical significance in this job category.

#### **2. Professionals**

A. Based on the analysis, there is no underutilization of statistical significance in this job category.

### **3. Technicians**

A. No data to report for this job category.

### **4. Protective Service**

A. No data to report for this job category.

### **5. Paraprofessionals**

A. Based on the analysis, there is no underutilization of statistical significance in this job category.

### **6. Administrative Support**

A. Based on the analysis, there is no underutilization of statistical significance in this job category.

### **7. Skilled Craft**

A. Based on the analysis, there is no underutilization of statistical significance.

### **8. Service Maintenance**

A. Hispanic/Latino males were underutilized by 15% within this job category. An additional 18 Hispanic/Latino males would be needed to reach parity with the available workforce in Cumberland County. FAST has set a goal to decrease the underutilization rate in this category by 6% over the next four years (a 1% decrease in underutilization over the next two years, and a 2% increase in the following two years), resulting in the addition of 18 Caucasian females in this period.

B. Asian males were underutilized by 2% within this job category. An additional two (2) Asian males would be needed to reach parity with the available workforce in Cumberland County. FAST has set a goal to decrease the underutilization rate in this category by 2% over the next four years (a 1% decrease in underutilization for each of the next four years), resulting in the addition of two (2) Asian males during this period.

C. Two or More Races males were underutilized by 8% within this job category. An additional nine (9) Two or More Races males would be needed to reach parity with the available workforce in Cumberland County. FAST has set a goal to decrease the underutilization rate in this category by 4% over the next four years (a 1% decrease in underutilization for each of the next four years), resulting in the addition of nine (9) Two or More Races males during this period.

D. Asian females were underutilized by 1% within this job category. An additional one (1) Asian female would be needed to reach parity with the available workforce in Cumberland County. FAST has set a goal to decrease the underutilization rate in this category by 2% over the next four years (a 1% decrease in underutilization for each of the next four years), resulting in the addition of three (1) Asian female during this period.

E. Caucasian females were underutilized by 17% within this job category. An additional twenty-one (21) Caucasian females would be needed to reach parity with the available workforce in Cumberland County. FAST has set a goal to decrease the underutilization rate

in this category by 12% over the next four years (a 3% decrease in underutilization for each of the next four years), resulting in the addition of twenty-one (21) Caucasian females during this period.

## V. STATISTICAL IMPACT OF EMPLOYMENT PRACTICES

### Data Sources and Methodology

All tables used for the Employment Practices Analysis (APPENDIX B) analyses are based on the sample charts provided by the FTA. While some minor changes have been made to the labeling and formatting of the sample charts, all formulas and calculations provided in the sample charts have been left intact.

The Promotions, Training, Terminations and Discipline tables use Total Workforce figures as a baseline for this analysis. The data in the Total Workforce row captures a snapshot of FAST's workforce, including all new hires during the reporting period. The total Workforce figures account for all employees who worked at FAST at any time during the reporting period.

For all tables, a selection rate for each demographic group is determined by dividing the number of people selected (promoted, trained etc.) by a total pool of candidate or employees. For all tables, and impact ratio is determined by comparing the selection rate for each group with that of the highest group (by dividing the selection rate for a group by the selection rate for the highest group). Potential adverse impact is flagged for any group that has a selection rate that is less than 80% of the selection rate for the highest group.

In accordance with the FTA regulations, an analysis for any demographic groups that constitute less than two percent of the applicable workforce is not required. Selection rates, ratios to highest rate and potential adverse impacts are not calculated in the table for groups that constitute less than two percent of the applicable job category.

For Hires and Promotions, the total number of candidates and selected employees who self-identified as veterans are included in the calculations. The hire and promotion rates for self-identified veterans are summarized by gender and ethnicity and not broken down by individual employment categories.

Statistical data on employees and candidates who self-identified as having a disability are unavailable. Data on persons with disabilities was not captured in the data from the HRD, therefore, is excluded from this report. Currently, the CoF permits applicants to voluntarily self-disclose personal data regarding veteran/disability status.

### Hires

The Hires table accounts for all candidates in all positions (full-time and part-time permanent positions) at FAST during the reporting period. The Number Applied row captures all individual candidates for these positions and the Total Hires row captures all new hires at FAST during the reporting period.

## Training

Statistical data on employee training is reliably and consistently tracked by the CoF's Organizational Development and Training (OD&T) division within the HRD department. Data in the Total Trained row captures the total number of FAST employees who received training that fosters promotion at any time during the reporting period. The training rates are derived by dividing the Total Trained row by the Total Workforce row.

## Promotions

The Total Workforce data (Appendix B) is used as the baseline figure in the Promotions table and the Total Promotions row captures all job actions that FAST deemed as advancements during the reporting period. These job actions include promotions, progressions and part-time to full-time status changes.

## Discipline

FAST currently consistently and reliably tracks data on disciplinary actions resulting from Oral Counseling to Consideration of Dismissal (COD). Data on demotions is provided by HRD. The disciplinary data captures all employees reprimanded during the reporting period including those employed who may have received multiple levels of discipline during the reporting period. The Discipline rate is derived by dividing each specific discipline level (Oral Counseling, Written Reprimand, Suspension without Pay, COD) row by the Total Workforce row. As per the FTA sample tables, Potential Adverse Impact is flagged only if substantial disparities are shown in both the Discipline Rate and the Non-Discipline Rate.

## Terminations

The total number of employees involuntarily terminated during the reporting period are captured in the Total Involuntary Terminations row. The involuntary Termination rate is derived by dividing the Total Involuntary Terminations row by the Total Workforce row. As per the FTA sample tables, Potential Adverse Impact is flagged only if substantial disparities are shown in both the Retention Rate and Involuntary Termination Rate.

## Findings

### Hires

A total of 2240 applications were received. 1041 males and 1193 females applied for positions at FAST during the reporting period. Six (6) individuals opted out of disclosing their sexual orientation. 109 males and 134 females were hired at FAST during this period, representing a 10.5% hiring rate for males and a 11.2% hiring rate for females.

*Note: Individuals could have submitted applications multiple times.*

FAST hired 33 out of 218 Caucasian male candidates and 17 out of 18 Caucasian female candidates. The department hired 74 out of 830 minority male candidates and 64 out of 1,001 minority female candidates.

### **Officials and Administrators**

Within this job category, FAST hired zero (0) out of 33 female candidates and one (1) out of 57 males. No potential adverse impacts were flagged for males or females within this job category.

The demographic group hired at the highest rate is African American males (3.8% selection rate). Considering this figure, calculations show potential adverse impact for nine (9) demographic groups. These include Caucasian males (0% selection rate), Caucasian females (0% selection rate), Hispanic/Latino /Latino males (0% selection rate), Hispanic/Latino /Latino females (0% selection rate), American Indian males (0% selection rate), Asian females (0% selection rate), African American males (0% selection rate), Two or More Races males (0% selection rate) and Two or More Races females (0% selection rate).

### **Professionals**

Within this job category, FAST hired four (4) out of 20 female candidates and zero (0) out of 30 males. No potential adverse impacts were flagged for males or females within this job category.

The demographic group hired at the highest rate is Caucasian females (75% selection rate). Considering this figure, calculations show potential adverse impact for eight (8) demographic groups. These include Caucasian males (0% selection rate), American Indian females (0% selection rate), Hispanic/Latino /Latino males (0% selection rate), Hispanic/Latino females (0% selection rate), Asian males (0% selection rate), Asian females (0% selection rate), African American males (0% selection rate) and Two or More Races females (0% selection rate).

### **Technicians**

No data to report on this job category.

### **Protective Services**

No data to report on this job category.

### **Paraprofessionals**

Within this job category, FAST hired one (1) out of 56 female candidates and two (2) out of 69 males. There may be a potential adverse impact for females in this category (1.8% selection rate).

The demographic group hired at the highest rate is African American females (4.0% selection rate). Considering this figure, calculations show potential adverse impact for four (4) demographic groups. These include Caucasian males (0% selection rate), Caucasian females (0% selection rate), Hispanic/Latino males (0% selection rate) and Two or More Races females (0% selection rate).

### **Administrative Support**

Within this job category, FAST hired 14 out of 494 female candidates and one (1) out of 104 males. There may be a potential adverse impact for males in this category (1.0% selection rate).

The demographic group hired at the highest rate is Caucasian males (3.8% selection rate). Considering this figure, calculations show potential adverse impact for four (4) demographic

groups. These include Caucasian females (2.8% selection rate), African American males (0% selection rate), Hispanic/Latino females (0% selection rate) and Two or More Races females (0% selection rate).

### **Skilled Craft**

Within this job category, FAST hired zero (0) out of three (3) female candidates and 16 out of 72 males. No potential adverse impacts were flagged for males or females within this job category.

The demographic group hired at the highest rate is Hispanic/Latino males (57.1% selection rate). Considering this figure, calculations show potential adverse impact for four (4) demographic groups. These include Caucasian males (33.3% selection rate), Caucasian females (0% selection rate), African American males (12.9% selection rate) and Two or More Races males (0% selection rate).

### **Service Maintenance**

Within this job category, FAST hired 106 out of 579 female candidates and 87 out of 715 males. There may be a potential adverse impact for males in this category (12.2% selection rate).

The demographic group hired at the highest rate is Caucasian females (25.0% selection rate). Considering this figure, calculations show potential adverse impact for five (5) demographic groups. These include African American females (10.5% selection rate), Hispanic/Latino males (19% selection rate), Hispanic/Latino females (9.3% selection rate), Two or More Races males (4.2% selection rate and Two or More Races females (2.9% selection rate).

### **Veterans**

27 self-identified male veterans and 14 self-identified female veterans applied for positions at FAST during this reporting period.

### **Promotions**

A total of 80 males and 91 females were employed at FAST during the reporting period.

### **Officials and Administrators**

Within this category, FAST promoted two (2) out of 32 female candidates. No males were promoted in this category. No potential adverse impacts are flagged for males and females within this category.

### **Professionals**

Within this category, FAST promoted one (1) out of 20 female candidates. No males were promoted in this category. No potential adverse impacts are flagged for males and females within this category.

The demographic group promoted at the highest rate is Caucasian females (25% promotion rate). Considering this figure, calculations show potential adverse impact for nine (9) demographic groups. These include Caucasian males (0%), American Indian males (0%), African American males (0%), African American females (0%), Hispanic/Latino /Latino males (0%),

Hispanic/Latino /Latino females (0%), Asian females (0%), Asian males (0%), and Two or More Races females (0%).

### **Technicians**

No data to report on this job category.

### **Protective Services**

No data to report on this job category.

### **Paraprofessionals**

Within this category, FAST promoted two (2) out of 56 female candidates and three (3) out of 69 males. No potential adverse impacts are flagged for males and females within this category.

The demographic group promoted at the highest rate is African American males (6.3% promotion rate). Considering this figure, calculations show potential adverse impact for six (6) demographic groups. These include Caucasian males (4.2%), Caucasian females (0%), African American males (6.3%), Hispanic/Latino males (0%), Two or More Races males (0%) and Two or More Races females (0%).

### **Administrative Support**

Within this category, FAST promoted four (4) out of 494 female candidates and one (1) out of 104 males. No potential adverse impacts are flagged for males and females within this category.

The demographic group promoted at the highest rate is Caucasian males (3.8% promotion rate). Considering this figure, calculations show potential adverse impact for five (5) demographic groups. These include Caucasian females (0.9%), African American males (0%), African American females (1%), Hispanic/Latino /Latino females (0%) and Two or More Races females (0%).

### **Skilled Craft**

Within this category, FAST promoted four (4) out of 72 males. No females were promoted in this category. No potential adverse impacts are flagged for males and females within this category.

The demographic group promoted at the highest rate is Hispanic/Latino /Latino males (14.3% promotion rate). Considering this figure, calculations show potential adverse impact for three (3) demographic groups. These include Caucasian females (0%), African American males (3.2%) and Two or More Races males (0%).

### **Service Maintenance**

Within this category, FAST promoted one (1) out of 715 males. No males were promoted in this category. No potential adverse impacts are flagged for males and females within this category.

The demographic group promoted at the highest rate is African American males (0.2% promotion rate). Considering this figure, calculations show potential adverse impact for five (5) demographic

groups. These include Caucasian males (0%), Caucasian females (0%), African American females (0%), Hispanic/Latino /Latino males (0%) and Two or More Races females (0%).

## **Discipline**

A total of # males and # females were employed at FAST during the reporting period of 3/1/2020 through 6/30/2023. 67 males and 78 females received a form of disciplinary action at FAST during this period.

*Note: Some employees may have received multiple levels of discipline during the reporting period.*

### **Administrative Support**

Within this job category, discipline was issued 27 times amongst seven (7) males; Oral Counselling (1), Written Reprimand (4), Suspension without pay (3), Dismissal (1) and COD (1). Discipline was issued a total of 17 times amongst eight (8) females; Oral Counseling (12), Written Reprimand (1) and Suspension without pay (4).

### **Officials and Administrators**

Within this job category, discipline was issued a total of two (2) times amongst one (1) male; Oral Counseling (1) and COD (1).

The demographic group disciplines at the highest rate are African American males (100%) in two (2) discipline categories.

### **Professionals**

Within this category, discipline was issued a total of three (3) times amongst (2) females; Oral Counseling (2).

The demographic group disciplined at the highest rate are Caucasian females (100%) in one (1) discipline category.

### **Technicians**

Within this job category, no discipline was issued. No potential adverse impacts were flagged for males or females within this job category.

### **Protective Service**

Within this job category, no discipline was issued. No potential adverse impacts were flagged for males or females within this job category.

### **Paraprofessionals**

Within this category, discipline was issued a total of (21) times amongst four (4) males; Oral Counseling (8), Written Reprimand (2), Suspension without pay (7) and COD (1). Discipline was issued a total of (25) times amongst five (5) females; Oral Counseling (11), Written Reprimand (2), Suspension without pay (12).

### **Service Maintenance**

Within this category, discipline was issued a total of (204) times amongst (50) males; Oral Counseling (42), Written Reprimand (42), Suspension without pay (102), COD (11) and Dismissal (7). Discipline was issued a total of (331) times amongst (64) females; Oral Counseling (108), Written Reprimand (66), Suspension without pay (129), COD (12) and Dismissal (16).

### **Skilled Craft Workers**

Within this category, discipline was issued a total of (24) times amongst nine (9) males; Oral Counseling (4), Written Reprimand (6), Suspension without pay (12), COD (1) and Dismissal (1).

## **VI. ASSESSMENT OF EMPLOYMENT PRACTICES**

A thorough analysis and assessment of FAST employment practices has been conducted to identify those practices that operate as employment barriers and unjustifiably contribute to underutilization. The assessment and identification of problem areas evaluates the impact of all employment practices on all employment patterns including recruitment, selection, promotion, termination, transfer, disciplinary action, compensation, benefits and training. FAST has conducted an in-depth analysis of our total employment process, including workforce by organizational unit and job group, personnel activity, compensation, and other personnel procedures to determine whether (and where) impediments to EEO may exist.

### **Recruitment and Selection**

The CoF defines its recruitment and selection process in the Recruitment and Selection Manual (APPENDIX C). The CoF is an Equal Opportunity Employer and affirms that no candidate or employee shall be deprived of employment opportunities because of such individual's race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, age (40 or older), disability or genetic information.

The CoF's recruitment and selection processes will be administered consistent with EEO laws. All departments/hiring managers are expected to ensure success and compliance with all aspects of the recruitment and selection process.

Each department within the City understands its role during recruitment to assist with expediting the hiring process. HRD will work closely with departments to ensure all necessary steps are being followed, as noted below.

**Human Resource Development (HRD)** is responsible for:

1. Reviewing requisitions and creating job postings.
2. Administering/proctoring skills testing when applicable.
3. Narrowing the candidate pool, if requested by the department, by providing the department the top candidates based on scoring of the supplemental question responses.
4. Providing oversight and guidance for the process.

**Hiring Managers (SMEs)** are responsible for:

1. Reviewing/developing the job description prior to the requisition being created and submitting job description changes to the HRD Compensation/Classification Consultant for review and final approval before proceeding with a requisition for posting.
2. Establishing the recruitment plan which includes developing supplemental questions for the posting, determining/selecting interview questions for the interview, serving as a selection process lead, identifying the interview panel, and identifying any other testing that may be included. **NOTE:** *All interview panels should be ethnically and gender diverse*
3. Appropriately status candidates.
4. Coordinating/scheduling interviews.

**Department Director** is responsible for:

1. Ensuring EEO requirements are considered in the recommendation of candidates selected to participate in the interview process.
2. Final approval of the selected candidate.

## Testing

FAST's hiring manager(s) will work with HRD to determine if skills testing will be included in the selection process and to identify the suitable tests for the position. Skills testing cannot be used to screen out candidates but should be considered as part of the overall assessment of a candidate.

Hiring managers can choose from the following:

**1. Software Skills Testing (Basic or Intermediate)**

- a. Microsoft Outlook, Word, Excel, PowerPoint, and/or Access

**2. Keyboarding Speed & Accuracy Testing**

- a. Keyboarding
- b. 10-key Speed & Accuracy
- c. Data Entry Speed & Accuracy

**3. Clerical Skills Testing**

- a. Letter Formatting
- b. Proofreading
- c. Spelling
- d. Reading Comprehension
- e. Transcription (Dictation)
- f. Alphabetic Filing and Numeric Filing
- g. Minutes Composition
- h. Sentence Clarity

#### **4. Customer Service Skills Testing**

- a. Telephone Customer Service
- b. Telephone Order Entry

#### **5. Financial Skills Testing**

- a. Math
- b. Petty Cash
- c. Bank Deposit
- d. Bank Reconciliation

All tests are validated and will be administered/proctored through HRD.

### **Promotion and Transfer**

1. All EEO guidelines will be recognized in promotion processes like regular recruitment and selection processes.
2. Promotion opportunities are administered like regular recruitment and selection processes (i.e. application process, interview, skills testing, successful completion of any required pre-employment screenings, etc.).
3. As with regular recruitment and selection processes, those considered for promotion must possess the requisite education/experience, knowledge, skills, abilities, competencies and achievements essential to a position. Additional considerations are the potential for the employee to perform satisfactorily at a higher level as well as the employee's historical conduct, performance, attitude, longevity and training.
4. Employees selected for promotion will have their date in position adjusted to coincide with the promotion and will receive a pay increase consistent with the applicable promotion information in the Compensation/Classification Manual.
5. The supervisors/departments impacted by an employee transitioning as a result of a promotion to a different department should collaborate on a reasonable transition date.

A lateral transfer is defined as the movement of an employee from one position to another position in the same pay grade in the same department or a different department.

### **Lateral Transfer Process**

1. Lateral transfers may be the result of a regular recruitment and selection process when an internal employee applies for a vacancy or may be a result of a departmental reassignment.
2. Lateral transfers may be administered like regular recruitment and selection processes (i.e. application process, interview, skills testing, successful completion of any required pre-employment screenings, etc.).
3. As with regular recruitment and selection processes, those considered for a position that would be a lateral transfer must possess the requisite education/experience, knowledge skills, abilities, competencies and achievements essential to a position. Additional considerations are the potential for the employee to perform satisfactorily in the lateral position as well as the employee's historical conduct, performance, attitude, longevity and training.

4. Employees selected for lateral transfer receive no adjustment to their compensation.\
5. Employees selected for lateral transfer may have their date in position adjusted, may receive new job results, and may be placed in a new one-year probationary period depending on the new position/department assigned. Employees should review the Compensation/Classification Manual for applicable information.
6. The supervisors/departments impacted by an employee transitioning as a result of a lateral transfer should collaborate on a reasonable transition date.

## Seniority Practices

FAST currently does not have seniority practices or provisions in place. Open positions are posted for all employees to see and to apply. Any qualified candidate who applies for a position is interviewed and provided the same opportunity to prove their capability of being the best candidate for the open position.

## Training

FAST conducts formal training for all hires and internal promotions. Trainings are held routinely for all employees during monthly mandatory All Employee Meetings (AEM). FAST's Safety & Training Coordinator holds annual refresher training for all employees to improve skills in areas of need to help avoid potential incidents and infractions. Additionally, the CoF offers on-the-job training designed to acquire/improve employee skillsets necessary for the qualifications of an advanced position within FAST.

## Compensation and Benefits

Each year prior to the adoption of the annual budget, Human Resource Development (HRD) shall secure information concerning the general level of salaries and wages paid in the marketplace, the salaries paid to comparable local government employees and any change in the cost of living in the area during the fiscal year and shall report the findings to the City Manager.

The detailed Compensation Plan can be found in the CoF's Compensation/Classification Manual (APPENDIX D)

1. The City compensates all employees in accordance with the federal Fair Labor Standards Act (FLSA). If any inconsistencies exist between this Compensation Plan and the FLSA, they are resolved in favor of the FLSA. In addition, any compensation not specifically covered in this compensation plan will conform to FLSA standards.
2. For purposes of compensation, the City workforce is divided into categories. These categories are reflected in subsequent sections of this Compensation Plan:
  - a. **Non-Exempt** – refers to positions that are subject to the compensation requirements of the FLSA. Employees are typically paid hourly.
  - b. **Exempt** – refers to positions that meet established criteria for exemption of the provisions of the FLSA. Employees are typically salaried.
3. An executive pay band (EPB) and senior executive pay band (EPBSR) has been established for department director level and higher positions.

4. For all other positions, an open range compensation structure with midpoints set to market has been established.

## **Market Maintenance**

1. The pay ranges will be updated to reflect changes in market conditions. Periodic updates to the pay ranges will be based on surveys to maintain plan competitiveness with the labor market.
2. Employees whose current rate of pay exceeds the maximum of a revised range will be frozen until such time as the pay range maximums are increased past the current rate of pay.
3. Employees whose current rate of pay is lower than the pay plan minimum of a revised range will have their rate of pay increased to the new pay range minimum unless they are in designated trainee status.

## **Benefits**

The CoF's Benefits Manual, published annually in a separate document, provides information regarding eligibility, requirements, and procedures. FAST reviews all benefits and conditions of employment to ensure they are equally available to all FAST employees.

## **Disciplinary Procedures and Termination Practices**

The CoF's Employee Relations Policy/Procedure Manual (APPENDIX E) was created to set forth regulations and expectations to establish a fair and uniform system of human resource administration, to include, but not limited to, the disciplinary process for all FAST employees. Department directors and supervisors are responsible for running a safe, efficient and effective delivery of services for the residents of Fayetteville. To ensure these responsibilities are met, they have the authority to recommend employees be disciplined for improper conduct, performance deficiencies, and/or violations of policies/procedures.

1. Department directors are responsible for the uniform and equitable administration of all disciplinary actions when employees violate the General or Departmental Rules, Code of Conduct, Code of Ethics, or any other established policy, rule or regulation.
2. FAST uses a progressive disciplinary process when appropriate. It is not necessary for employees to violate the same rule before they progress to the next step in the process. Depending on the seriousness of the violation, steps may be skipped in the process. Additionally, depending upon the seriousness of the violation, the disciplinary process can be started at any step, up to and including a COD.
3. Disciplinary action is taken in an attempt to correct conduct, performance, or deficiencies. Supervisors recommend the lowest level of discipline they believe is necessary to correct the issue. These recommendations are taken in consideration by the department director prior to any disciplinary action being issued.
4. Department directors are required to sign all disciplinary actions before issuance.

## **Considerations of Dismissal**

COD letters are notices to an employee that the department director is considering dismissing the employee. A FAST divisional manager, or the FAST Director in the absence of a divisional

manager, may issue a COD letter to employees for the following reasons, which are representative but not exclusive reasons for dismissal. A) continued violations of rules; and/or B) continued performance deficiencies; and/or C) a serious or flagrant violation.

1. Employees may be issued a COD letter without prior disciplinary actions.
2. COD letters will include the grounds upon which the consideration to dismiss is based, the specific rules violated, list prior disciplinary actions if applicable, and provide the employee with the specific requirements and deadline for appealing the COD. COD letters detail the rights of employees at appeal hearings.
3. COD letters advise employees they are placed on suspension without pay, effective with the issuance of the letter, until a final decision is rendered.
4. In no event shall a final decision of dismissal take place for at least seven (7) calendar days after the date the COD letter is hand-delivered to the employee or ten (10) calendar days after the COD letter is sent/post-marked, whichever comes first. If hand delivered to an employee, the employee should receive a copy.

## **VII. MONITORING AND REPORTING SYSTEM**

FAST will develop and implement enhanced monitoring and reporting systems that ensure the effectiveness of our EEO Program through routine monitoring and measurement. While not all the EEO categories show that FAST met all the labor market standards, Fayetteville Area System of Transit is committed to making good faith efforts to achieve our goals. An important part of FAST's successful EEO/AA Plan is the establishment, by the EEO Officer, of an effective and workable internal monitoring and reporting system. FAST views the monitoring activities that are listed below as critical to the success of our EEO Program.

- A. The Human Resources Department is responsible for maintaining data to track recruitments, candidate flow, hires, promotions and transfers, training, discipline, and terminations. The EEO Officer, or his/her designee, periodically reviews reports generated from this personnel data collection, and reports possible problem areas to the appropriate levels of management.
- B. The EEO Officer and Human Resources staff will issue semi-annual workforce population status reports to FAST's EEO Coordinator. These reports provide the gender and minority composition of the FAST workforce.
- C. On a semi-annual basis, summary statistics are collected; sex/minority reports for candidate flow are issued; hires, promotions and transfers, training, discipline and employment terminations are analyzed; and progress toward meeting future goals and timetables is reviewed and measured semi-annually and the EEO Officer will discuss the status with the EEO Coordinator, FAST leadership and the City Manager.
- D. The EEO Officer, in conjunction with the EEO Coordinator, completes/submits reports as required per federal guidelines.
- E. Data on employee demographic information, hires, promotions and transfers, and terminations is maintained through the current Enterprise Resource Planning (ERP) system which is a JD Edwards (Oracle) based module.
- F. Data on discipline and training for all employees is maintained by the Human Resources Department through a FAST-built database of which Human Resources staff has access to review and run reports.

- G. Data on recruitments and candidate flow is maintained through NeoGov, which is a web-hosted job-candidate tracking system.
- H. EEO discrimination complaints are maintained through a Microsoft Excel spreadsheet and paper files.
- I. Periodic review and monitoring of EEO discrimination complaints are managed by the Human Relations Department, the City Attorney, HRD staff and City Manager.

This structure and system is designed to serve the following basic purposes:

- Enabling FAST to evaluate the EEO Program during the year and to take necessary corrective action regarding the development and execution of programs or goals and timetables.
- Assessing and measuring EEO Program accomplishments.
- Identifying those units where improved results toward the achievement of EEO Program goals is required.
- Providing a precise and factual database for future projection.

Should this analysis reveal any indication of disparate treatment, the EEO Officer, in conjunction with the EEO Coordinator and the Human Relations Department, will confer with the City Attorney and City Manager to develop remedial actions. Additionally, Human Relations Department staff will review report results on a continuing basis with the appropriate levels of management. FAST's management staff will be consulted regarding recommendations, changes, and problem areas related to EEO Program goals and objectives.

### **Subcontractor Monitoring**

FAST is committed to ensuring that our subcontractors carry out the EEO provisions outlined in FTA CFR 4704.1 regarding EEO Program Guidelines for Grant Recipients. FAST's Civil Rights Program Analyst is responsible for subcontractor compliance and will ensure an enhanced EEO Program monitoring program which includes the following:

1. A thorough review of the subcontractor's EEO/Affirmative Action Program. If FAST finds deficiencies in the subcontractor's EEO program, based on our interpretation of Circular 4704.1, FAST will inform the subcontractor of the deficiencies in writing and provide a time frame and a due date for the subcontractor to remedy the deficiency.
2. Site visit of the subcontractors' worksites to ensure compliance with EEO Statement of Policy and other antidiscrimination and anti-harassment policies, posting requirements.
3. Documentation of subcontractor's compliance with Circular 4704.1. 38 The department has and will continue to provide subcontractors with technical assistance in the form of direct guidance in addition to supplemental resources, such as sample documents (copies of FAST's EEO Statement of Policy and Sample EEO/Affirmative Action Plans).

## CONCLUSION

The recognition of the value of a sound and effective EEO Program and any associated goals are of continuing importance to FAST. This EEO Program is designed to specifically address the requirements of Executive Order 11246, and the implementing rules as set forth in FTA Circular 4704.1A. There is an unequivocal expectation by FAST that all members of management are committed to the realization of these objectives.

FAST is dedicated to this EEO Program and will continue to strive for its successful implementation.

## LIST OF APPENDICES

- A. Utilization /Availability Analysis
- B. Employment Practices Analysis
  - Hires
  - Promotions
  - Trainings
  - Terminations
  - Discipline
- C. CoF's Recruitment & Selection Manual
- D. CoF's Compensation Plan
- E. CoF's Employee Relations Policy/Procedure Manual

## **LIST OF ATTACHMENTS**

- I.** City Manager EEO Letter
- II.** EEO Policy Statement
- III.** Employment Application EEO Statement
- IV.** CoF ADA Policy
- V.** FAST 2023 Organizational Chart