



EQUAL EMPLOYMENT OPPORTUNITY PROGRAM



July 1, 2017—June 30, 2021





EQUAL EMPLOYMENT OPPORTUNITY (EEO) PROGRAM

FY 2018–2021

July 1, 2017 – June 30, 2021

Book No:

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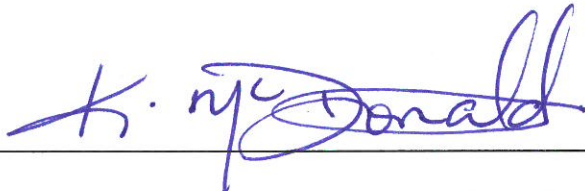
Equal Employment Opportunity (EEO) Program

Long Beach Transit

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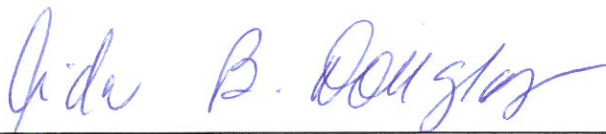
Approved By:



Kenneth A. McDonald

President and Chief Executive Officer

Issued By:



Aida B. Douglas

Regulatory Compliance and Civil Rights Officer

Equal Employment Opportunity (EEO) Program

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30	Frank Spalding, Fleet Maintenance Manager
31	Dino Smith, Training Manager
32	James Wasson, Information Technology Manager
33	Duane Zertuche, Environment, Health and Safety Manager

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Introduction

Founded in 1963, Long Beach Transit (LBT) is the transit system in Los Angeles County, California serving the cities of Long Beach, Lakewood and Signal Hill, as well as portions of Artesia, Bellflower, Carson, Cerritos, Compton, Hawaiian Gardens, Los Alamitos, Norwalk, Paramount and Seal Beach (in Orange County). LBT's service area is approximately 100 square miles with 35 routes and 26.2 million boarding customers annually. LBT also provides demand responsive paratransit service (Dial-A-Lift), and water taxi service (AquaBus and AquaLink). LBT's workforce has more than tripled over the past 50 years and as of the last Equal Employment Opportunity (EEO-4) Report submitted to the Equal Employment Opportunity Commission (EEOC) on September 30, 2017, included 716 full-time and 22 part-time employees.

In preparing this Equal Employment Opportunity (EEO) Program, LBT followed guidance provided by the Federal Transit Administration (FTA) Circular 4704.1A. Additionally, terminology from Executive Order 11246 and its implementing regulations has also been utilized as a guide. Therefore, the use of such terms as "underutilization," "problem identification," "corrective action," and so forth, should not be construed as an admission, in whole or in part, that in fact either minorities or females have been or are presently being underutilized or discriminated against in any way in violation of federal, state or local fair employment practice laws. Further, nothing contained in this program or its supporting data should be construed as an admission, in whole or in part, of any violation of such federal, state or local fair employment practice laws.

In developing and implementing this EEO Program, LBT has been guided by its established policy of providing equal employment opportunities. Any goals established herein are not intended as rigid, inflexible quotas that must be met, but rather as targets reasonably attainable by means of applying good faith effort to make all aspects of this plan work. The use of goals and timetables is not intended, nor is it the effect of the plan, to discriminate against an individual or group of individuals with respect to any employment opportunity for which they are qualified. Indeed, nothing herein is intended to sanction the discriminatory treatment of any person. Thus, this EEO program has been developed in reliance upon the requirements set forth by FTA Circular 4704.1A.

Statement of Policy



EQUAL EMPLOYMENT OPPORTUNITY POLICY

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

LBT's Equal Employment Opportunity (EEO) policy applies to all employment actions, including but not limited to, recruitment, hiring, selection for training, promotion, transfer, demotion, layoff, termination, rates of pay or other forms of compensation.

All applicants and employees have the right to file complaints alleging discrimination. Retaliation against an individual who files a charge or complaint of discrimination, participates in an employment discrimination proceeding (such as an investigation or lawsuit), or otherwise engages in protected activity is strictly prohibited and will not be tolerated.

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

As LBT's President and CEO, I maintain overall responsibility and accountability for LBT's compliance with its EEO Policy and Program. To ensure day-to-day management, including program preparation, monitoring, and complaint investigation, I have appointed Aida B. Douglas, Regulatory Compliance and Civil Rights Officer as LBT's EEO Officer. She can be reached at 562.489.8476 or via email at RCCRO@lbtransit.com. Ms. Douglas reports directly to me regarding EEO issues and acts with my authority with all levels of management, labor unions and employees.

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

LBT is committed to adhering to a written nondiscrimination program that sets forth the policies, practices and procedures, with goals and timetables, to which the agency is committed and make the EEO Program available for inspection by any employee or applicant for employment upon request.

I am personally committed to a workplace that acts upon its daily responsibility to treat all applicants and employees with dignity and respect, as well as equitably under the guidelines of LBT's EEO Policy and Program.

A handwritten signature in blue ink, appearing to read 'K. McDonald'.

Kenneth A. McDonald
President and CEO

2/27/2018.
Date

Dissemination

Internal Dissemination

LBT disseminates its Equal Employment Opportunity (EEO) Policy internally by:

1. Posting and distributing the President and Chief Executive Officer's (CEO) written support of the EEO Policy on bulletin boards, in employee congregation areas, and in the employment/Human Resources departmental office
2. Explaining the EEO Policy thoroughly in new employee orientation, State Mandated Annual Refresher Training (SMART) classes for operators and maintenance employees, as well as including the EEO Policy Statement in employee handbooks
3. Conducting periodic meetings with executive, management, and supervisory employees to explain the intent of the EEO Policy, the CEO's commitment to the Program, and individual responsibilities for effective implementation
4. Conducting periodic meetings and training with all employees, including managers, to discuss the EEO Policy and program implementation
5. Conducting EEO training for all new supervisors or managers within 90 days of their appointment

External Dissemination

LBT disseminates its Equal Employment Opportunity (EEO) Policy externally by:

1. Written notification that LBT is an Equal Employment Opportunity Employer to regular recruitment sources, such as: employment agencies; educational institutions; minority, disabled, female, and veterans organizations; civil rights organizations; community action groups; and others who refer applicants
2. Written notification sent to appropriate subcontractors, vendors and suppliers that LBT is an Equal Employment Opportunity Employer
3. Including a statement "LBT is an Equal Employment Opportunity Employer" on employment applications and recruitment postings

Personnel Responsibility

EEO Officer Responsibility

LBT's EEO Officer, Aida B. Douglas, has direct access to the CEO regarding the EEO Program (see Organizational Chart on **page 8**).

To carry out and monitor the responsibilities of the EEO Program, the EEO Officer or approved designee performs the following tasks:

- Develop the EEO policy statement and a written EEO Program
- Assist management in collecting and analyzing employment data, identifying problem areas, setting goals and timetables, and developing programs to achieve goals
- Design, implement, and monitor internal audit and reporting systems to measure program effectiveness and to determine where progress has been made and where proactive action is needed
- Review the agency's nondiscrimination plan with all managers and supervisors to ensure that the policy is understood
- Concur in the hiring and promotion process
- In conjunction with human resources, periodically review employment practices policies (e.g., hiring, promotions, training), complaint policies, reasonable accommodation policies, performance evaluations, grievance procedures, and union agreements
- Report at least semiannually to the President and CEO on each department's progress in relation to the agency's goals and on contractor and vendor compliance
- Serve as liaison between the agency; federal, state, county, and local governments; regulatory agencies; and community groups representing minorities, women, and persons with disabilities, and others
- Maintain awareness of current EEO laws and regulations, and ensuring the laws and regulations affecting nondiscrimination are disseminated to responsible officials
- Investigate complaints of EEO discrimination
- Provide EEO training for employees and managers
- In conjunction with human resources, advise employees and applicants of available training programs and professional development opportunities and the entrance requirements
- Auditing postings of the EEO policy statement to ensure compliance information is posted and up to date

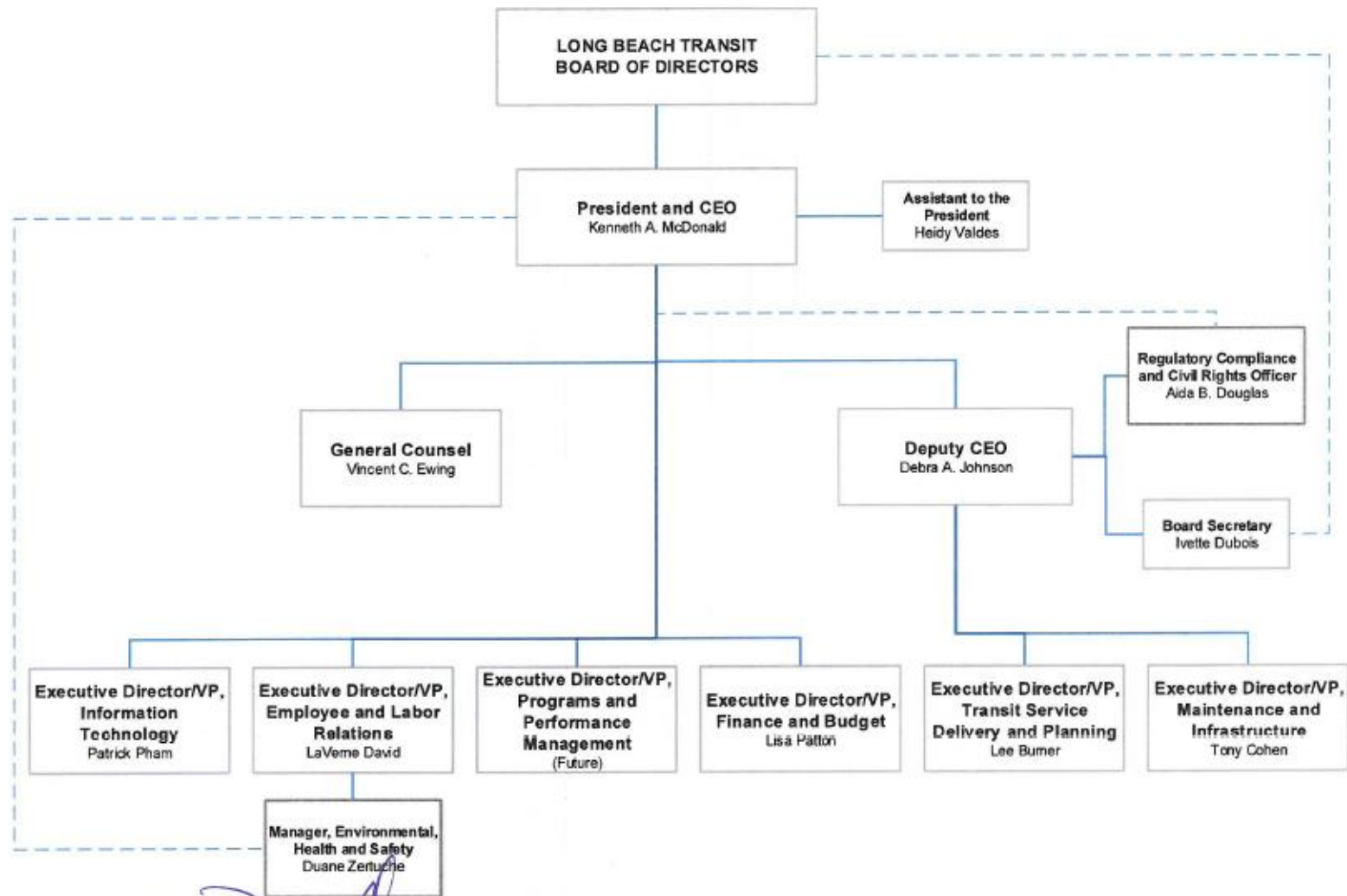
If a conflict of interest should occur between Human Resources and the EEO Program, the EEO Officer, who has direct and independent access to the President and CEO, shall obtain his/her assistance to resolve the conflict.

Agency Responsibility

Managers are responsible for implementing the EEO Policy within their respective areas. Managers are aware that their EEO efforts and results are considered in their overall job performance. In cooperating with LBT's EEO Officer or approved designee to carry out the measures listed above, managers will:

- Assist in problem identification and in the establishment of goals and objectives
- Participate in EEO outreach activities with organizations that promote EEO such as local minority, female, persons with disabilities, veterans organizations and community action/service organizations/groups
- Participate in periodic audits of all aspects of employment identity and remove any barriers obstructing goals and objectives
- Discuss the EEO Program with managers and supervisors to be certain that LBT's EEO Policy is being followed
- In conjunction with the EEO Officer, maintain and update the personnel database for generating reports required for the nondiscrimination program
- Review employee qualifications to ensure that minorities, females, persons with disabilities and protected veterans are given full opportunities for transfer and promotion
- Take action to prevent unlawful harassment of employees placed through equal opportunity efforts
- Conduct and support career counseling for all employees
- Participate in periodic audits in all aspects of employment to identify and remove barriers obstructing the achievement of specified goals and objectives
- Cooperate with the EEO Officer in review of information and investigation of complaints
- Encourage employee participation to support the advancement of the EEO Program (e.g., professional development and career growth opportunities, posting promotional opportunities, shadowing, mentoring)

LBT Organizational Chart



Approved:

September 18, 2017

Work Force Analysis

Determination of Job Groups

In order to properly develop the availability analysis and ultimately the employment goals, LBT's job titles have been arranged in Job Groups which fall within the **EEO-4** Job Category definitions, as defined by the Equal Employment Opportunity Commission (EEOC).

The Work Force Utilization by Job Group is attached as **Exhibit 1**.

Availability Analysis

Availability statistics have been compiled for the geographic areas represented in this EEO Program. An availability analysis using these statistics was performed for females and minorities. The availability analysis took into consideration the following factors:

- The general availability of minorities and females having requisite skills in the immediate labor area
- The availability of minorities and females having requisite skills in an area from which LBT can reasonably recruit
- The availability of promotable and transferable minorities and females within the organization

The value weights assigned to the factors were based on the experience of LBT in filling positions within each Job Group. Refer to **Exhibit 1**.

Sources of Data

The requisite skill and general labor force data sources used for each job group in this Program were derived using the United States Census 2010 data. The Local Recruitment Area for all job groups is Los Angeles County and the Reasonable Recruitment Area is Orange County with the exception of the Executive Level job group. The Reasonable Recruiting Area for the Executive/Senior Officials and Managers is the United States.

The data for Promotions was taken from the Job Group Analysis as of June 30, 2017, as indicated on the Availability Analysis.

The following existing filled job positions were used:

1. Officials and Administrators

<i>Job Group</i>	<i>Occupation Code</i>	
1000	President & Chief Executive Officer	Officials & Administrators
1103	Deputy Chief Executive Officer	Officials & Administrators
2001	Exec Dir, VP Employee & Labor Relations	Officials & Administrators
2102	Exec Dir, VP Finance & Budget	Officials & Administrators
2150	Exec Dir, VP Information Technology	Officials & Administrators
2200	Exec Dir, VP Maintenance & Infrastructure	Officials & Administrators
2301	Exec Dir, VP Transit Service Delivery & Planning	Officials & Administrators
3100	Manager, Human Resources	Officials & Administrators
3111	Treasurer	Officials & Administrators
3122	Controller	Officials & Administrators
3127	Regulatory Compliance & Civil Rights Officer	Officials & Administrators
3204	Superintendent, Transit Services	Officials & Administrators
3301	System Security Officer	Officials & Administrators

2. Professionals

<i>Job Group</i>	<i>Occupation Code</i>	
3000	Assistant to the President	Professionals
3002	Board Secretary	Professionals
3115	Manager, Purchasing	Professionals
3120	Manager, Finance	Professionals
3121	Senior Accountant	Professionals
3128	Manager, Information Technology	Professionals
3130	Manager, Maintenance	Professionals
3133	Manager, Maintenance Technology	Professionals
3136	Manager, Facilities & Infrastructure	Professionals
3146	Manager, Info Technology Projects	Professionals
3150	Manager, Service Development	Professionals
3160	Manager, Marketing & Customer Services	Professionals
3201	Transit Analyst	Professionals
3210	Manager, Training	Professionals
3223	Manager, Environment, Health, & Safety	Professionals
3502	External Affairs Manager/P.I.O.	Professionals
4100	Supervisor, Training	Professionals
4110	Supervisor, Maintenance	Professionals
4115	Supervisor, Utilities	Professionals
4119	Maintenance Operations Planner	Professionals
4120	Supervisor, Stops & Zones	Professionals
4125	Supervisor, Facilities	Professionals
4130	Supervisor, Transit Service Delivery	Professionals

<i>Job Group</i>	<i>Occupation Code</i>	
4135	Supervisor, Payroll	Professionals
4143	Supervisor, Customer Service	Professionals
4144	Financial Analyst	Professionals
4185	Service Development Planner	Professionals
4191	Dial-A-Lift Coordinator	Professionals
4195	Senior Service Development Planner	Professionals
4198	Service Development Analyst	Professionals
4200	Safety Officer	Professionals
4301	HR Project Coordinator	Professionals
4305	Grants Accountant	Professionals
4315	Buyer	Professionals
4316	Senior Buyer	Professionals
4322	Applications Engineer	Professionals
4323	Network Engineer	Professionals
4324	Information Systems Technologist	Professionals
5010	HR Recruiter	Professionals
5016	HR Benefits	Professionals
5031	Assistant to DCEO/Gen Counsel	Professionals
5041	Supervisor, Revenue	Professionals
5042	Supervisor, Money Room	Professionals
5055	Staff Accountant, Payroll	Professionals
5065	Staff Accountant, AP	Professionals
5101	Transit Service Office Administrator	Professionals
5131	Marketing/Customer Service Administrator	Professionals
5171	Cust. Svc. and Community Relations Coord.	Professionals
6315	Quality Assurance Specialist	Professionals
9565	Maintenance Analyst	Professionals

3. Technicians

<i>Job Group</i>	<i>Occupation Code</i>	
5085	Facilities Maintenance Technicians	Technicians

4. Protective Service Workers

No staff currently in this category

5. Paraprofessionals

<i>Job Group</i>	<i>Occupation Code</i>	
5001	Risk Mgmt Representative/Workers Comp	Paraprofessionals
5005	HR Assistant	Paraprofessionals
5006	HR Representative	Paraprofessionals
5022	Risk Mgmt Representative/Gen. Liability	Paraprofessionals
5110	Service Dev. Assistant/Scheduler	Paraprofessionals
5117	Service Planning Administrator	Paraprofessionals

6. Administrative Support Workers

<i>Job Group</i>	<i>Occupation Code</i>	
4102	Mgmt. Assistant, Training	Administrative Support
4106	Inventory Controller	Administrative Support
5023	Administrative Assistant, Risk Mgmt	Administrative Support
5035	Parts Storekeeper	Administrative Support
5050	P/T Money Counter	Administrative Support
5070	Maintenance Admin Specialist	Administrative Support
5076	Administrative Assistant, Maintenance	Administrative Support
5116	Data Collector	Administrative Support
5135	Customer Service Reps	Administrative Support
5140	Customer Service Clerks	Administrative Support
5160	Mail Courier	Administrative Support
9702	College Intern - Finance	Administrative Support
9703	College Intern - Facilities Engineer	Administrative Support
9704	College Intern - Government Relations	Administrative Support
9705	College Intern - Health, Safety & Risk	Administrative Support
9706	College Intern - Service Planning	Administrative Support
9707	College Intern - Ext Affairs/Gen Mgmt.	Administrative Support
9708	College Intern - Maintenance Acct	Administrative Support
9709	College Intern - Facility Management	Administrative Support
9710	College Intern – Transit Service Delivery	Administrative Support
9711	College Intern - Maintenance Systems Analyst	Administrative Support
9712	College Intern - Grants	Administrative Support
9713	College Intern - Mktg & Community Relations	Administrative Support
9714	College Intern – Information Technology	Administrative Support
9715	College Intern – Procurement	Administrative Support

7. Skilled Craft Workers

<i>Job Group</i>	<i>Occupation Code</i>	
6000	Lead Person (Maintenance)	Skilled - Craft Workers
6300	Mechanic – A	Skilled - Craft Workers
6301	Body & Paint A	Skilled - Craft Workers
6305	Mechanic – B	Skilled - Craft Workers
6306	Body & Paint B	Skilled - Craft Workers
6310	Mechanic – C	Skilled - Craft Workers

8. Service Maintenance

<i>Job Group</i>	<i>Occupation Code</i>	
5080	Stops & Zones Assistants	Service - Maintenance
6005	Lead Person (Utility)	Service - Maintenance
6020	Custodians	Service - Maintenance
6100	Bus Operators	Service - Maintenance
6200	Student Operators	Service - Maintenance
6400	Utilities	Service - Maintenance

Utilization Analysis

LBT has identified areas of underutilization consistent with the definitions in 41 CFR 60-2.11 (b), which considers underutilization to be “having fewer minorities or females in a particular Job Group than would reasonably be expected by their availability.” Please note that this voluntary identification has been made only for the purpose of complying with the letter and spirit of the regulations.

A Utilization Analysis was performed by comparing female/minority availability estimates within each Job Group to the number of females and minorities actually employed in each category on June 30, 2017. A determination of underutilization was made whenever there were fewer minorities or females in a particular Job Group than would reasonably be expected by their availability.

The word “underutilization” is not intended to be, nor should be construed as, an admission in whole or in part that in fact either females or minorities are, or have been underutilized or concentrated in any way which is in violation of federal, state or local fair employment practice laws. Further, nothing contained in this section should be construed as an admission by LBT that it has contravened such federal, state or local employment practice laws.

The following Utilization Analysis, attached as **Exhibit 1**, uses the FTA recommended spreadsheet which indicates apparent underutilization using the “whole person” test. This test compares the availability rate with the participation rate for each Job Group. The acceptance range for this test is any number less than 49 percent of one person. Therefore, less than 49 percent is not considered a person. Any representation which results in a difference greater than 50 percent would be rounded up as one person and is counted as “underutilized.”

The Utilization Analysis compares the participation rate with the availability rate for each Job Group. Where underutilization exists, it is indicated on the report by a “Yes.”

Goals have been established for Job Groups where the difference between availability and representation fails the “80 percent test” by at least one whole person. To develop a plan for reaching parity with availability rates, the formula provided in the FTA recommended spreadsheets has been applied which considers participation as of June 30, 2017, anticipated openings, and expansion and contraction. The Goals Report is included in **Exhibit 1**.

Progress Toward Meeting FY 2014–2017 Goals

In the FY 2014–2017 Plan, goals were established for the following Job Groups where the percentage representation of females or minorities was less than the availability.

Job Group	% Representation Prior Plan 12/31/13	% Representation Current Plan 06/30/17	Progress
<i>Females</i>			
2 – Professionals	*	28.1%	28.1%
3 – Technicians**	0%	0%	0%
7 – Skilled Craft Workers	0%	0%	0%
8 – Service-Maintenance Workers	29%	35.4%	6.4%
<i>Minorities</i>			
2 – Professionals	56%	69.8%	13.8%

* In 2013 using EEO-1 Job Group data, 1.3 – Supervisors merged with 1.2 – First/Mid-Level Managers & Supervisors. There were no required goals. In 2017, LBT used EEO-4 Job Group categories data as recommended by FTA Circular 4702.1A which changed the jobs to the Professionals Job Group.

**The percentage of persons underutilized is under .50 percent of a person. Due to the “whole person rule,” no goal required.

The projected percent represents a four-year goal for females:

Below are the statistics of the two goal areas that have remained a major challenge to fill with females: Technicians and Skilled Craft Workers.

Note that the goal for a female in the Job Group 3-Technicians category is less than 50 percent of a female person. There have been no job openings in Job 5085 during the prior Plan period or current Plan period, and 11 females applied for Job 5080 in the prior Plan period. In the Job Group 7-Skilled Craft Workers category, there has not been a female employed at LBT since 2013. Recruiting efforts to attract females have expanded to posting job openings on military and veteran websites and in publications. Competition with two neighboring large transit agencies, Los Angeles County Metropolitan Transportation Authority (LA Metro) and Orange County Transportation Authority (OCTA) may also have impacted LBT's ability to successfully attract skilled craft workers, both male and female. No females have applied in the Job Group 7-Skilled Craft Workers category in the prior or present Plan periods.

Job Group	Available Females	Utilized Females	Goal
3 – Technicians	45.6%	0%	45.6% <50% of 1 female
Total Number of Employees in Jobs			
5085 – Facilities Maintenance Technician	3		
5080 – Stops & Zones Assistants*	9		
* In current plan, position moved to Job Group 8: Service – Maintenance			
Job Group	Available Females	Utilized Females	Goal
7 – Skilled Craft Workers	6.6%	0%	1 female
Total Number of Employees in Jobs			
6000 – Lead Person (Maintenance)	6		
6300 – Mechanic A	22		
6305 – Mechanic B	15		
6310 – Mechanic C	9		

Identification of Placement Goals by Job Groups

Review of Job Groups

The following identifies Job Groups in which the apparent underutilization of females or minorities amount to at least one whole person or less where no goal is required. LBT has a total of **716** full-time employees and **22** part-time employees with **658** minorities (89 percent) and **248** (34 percent) females included in this Plan.

1. Officials and Administrators – This group consists of **14** employees: **8** females and **9** minorities. There is no placement goals for minorities or females at this time. As shown on the Availability Analysis, **60 percent** of the vacancies are filled through external hires, and **40 percent** are filled through internal promotion. Hires come from Los Angeles and Orange counties. Statistical adverse impact was indicated in the minority hiring rate. No statistical adverse impact is indicated in the female or minority termination rate.

2. Professionals – This group consists of **96** employees: **27** females and **67** minorities. There is a placement goal of **25 percent** for females (**23 females**) and no placement goals for minorities at this time. As shown on the Availability Analysis, **48 percent** of the vacancies are filled through external hires, and **52 percent** are filled through internal promotion. Hires come from Los Angeles and Orange counties. There is no statistically significant adverse impact indicated by the female or minority hire rate. Statistical adverse impact was not indicated in the female or minority promotion rate. No statistical adverse impact is indicated in the female or minority termination rate.

3. Technicians – This group consists of **3** employees: **0** females and **1** minorities. Minorities or females do not have placement goals. As shown on the Availability Analysis, 100 percent of the vacancies are filled through external hires, and 0 percent are filled through internal promotion. Hires come from Los Angeles and Orange counties. There is no statistically significant adverse impact indicated by the female or minorities hire rate. There was no promotion activity. No statistical adverse impact is indicated in the female or minority termination rate.

4. Protective Services – There is currently no staff under this category.

5. Paraprofessionals – This group consists of **6** employees: **4** females and **5** minorities. There are no placement goals for females or minorities at this time. As shown on the Availability Analysis, **67 percent** of the vacancies are filled through external hires, and **33 percent** are filled through internal promotion. Hires come from Los Angeles and Orange Counties. There is statistically significant adverse impact indicated in by the female or minority hire rate. Statistical adverse impact was not indicated in the female or minority promotion rate. No statistical adverse impact is indicated in the female or minority termination rate.

6. Administrative Support – This group consists of **42** employees: **24** females and **32** minorities. There is a placement goal of **14 percent** for females (**4 females**) and a placement goal of **5 percent** for minorities (**1 minority**). As shown on the Availability Analysis, **98 percent** of the vacancies are filled through external hires, and **2 percent** are filled through internal promotion. Hires come from Los Angeles and Orange counties. There is statistically significant adverse impact indicated in by the female and minority hire rate. Statistical adverse impact was not indicated in the female or minority promotion rate. Statistical adverse impact is indicated in the female and minority termination rate.

7. Skilled Craft Workers – This group consists of **55** employees: **0** females and **44** minorities. There is a placement goal of **13 percent** for minorities (**6 minorities**), and females have a placement goal of 2% (**1 female**). As shown on the Availability Analysis, **33 percent** of the vacancies are filled through external hires, and **67 percent** are filled through internal promotion. Hires come from Los Angeles and Orange counties. There is no statistically significant adverse impact indicated by the female or minority hire rate. Statistical adverse impact was not indicated in the minority promotion rate. Statistical adverse impact is indicated in the female or minority termination rate.

8. Service - Maintenance – This group consists of **522** employees: **185** females and **500** minorities. There is a placement goal of **32 percent** for minorities (**170 minorities**), and females have a placement goal of **27 percent** (**144 females**). As shown on the Availability Analysis, **94 percent** of vacancies are filled through external hires, and **6 percent** are filled through internal promotion. Hires come from Los Angeles and Orange counties. There is no statistically significant adverse impact indicated by the female and minority hire rate. Preliminary statistical significance is indicated in the female promotion rate and the items outlined in the Action Oriented section will be followed. The minority promotion rate indicates some preliminary statistical significance and the items outlined in the Action Oriented section will be followed. No statistical adverse impact is indicated in the female or minority termination rate.

Employees will be informed of, and encouraged to pursue, promotion opportunities and training to prepare for new jobs, maintain and improve performance, and overcome and prevent obsolescence. LBT will use alternate recruitment sources when necessary to attract more qualified external applicants.

Assessment of Employment Practices

The employment policies and practices of LBT are continually under review for the purpose of determining whether any policy or practice inadvertently or otherwise results in unequal opportunity for females and minorities. In addition, the EEO Officer has reviewed the Uniform Guidelines on Employee Selection Procedures (1978) issued by the Equal Employment Opportunity Commission (EEOC), the Department of Labor, and the Department of Justice to ensure that LBT's selection process is in compliance. The following items will be considered:

1. Composition of the work force by minority group and sex. Good faith placement goals are established where necessary.
2. Composition of applicant flow by minority group and sex. Corrective action will be taken as appropriate, whenever the referral ratio of women and minorities to the hiring supervisor or manager indicates a significantly higher percentage are being rejected as compared to non-minority and male applicants.
3. LBT evaluates its compensation system to determine whether there are gender, race or ethnicity-based disparities. The purpose of the analysis is to identify potential areas where impediments to equal employment opportunity may exist. Disparities alone do not necessarily indicate a problem area; there may be many non-discriminatory reasons for a disparity.
4. The selection process including: position descriptions, titles, application forms, pre-employment forms, interview procedures, test validity and administration, referral procedures, final selection process and similar factors. The application and related pre-employment forms are in compliance with federal guidelines, and position descriptions accurately reflect actual duties and responsibilities.
5. Any other areas that might impact the success of LBT's Plan, which may include but are not limited to:
 - Transfer and promotion practices. Promotions and transfers are made on the basis of qualifications of the individual without regard to race, color, sex, religion, national origin, disabled or veteran status.
 - LBT-sponsored recreational, social, and educational events have not excluded women and minorities from participation.
 - The general attitude of the work force and management is positive toward LBT's Employment programs.
 - EEO posters and policy statements are displayed in employee common areas such as lunch break rooms, and in employee lounges at all facility locations. The EEO statement is

included on purchase orders, contracts and other LBT documents such as employment applications and advertisements.

- There is no indication of a lack of suitable housing and transportation prohibiting recruitment efforts and employment of minorities.
- LBT reviews its training programs, both formal and informal, and has not found them to be discriminatory. These programs will be analyzed annually or when appropriate.

Personnel Activity

The following paragraphs discuss the results of an analysis of the participation rates of females and minorities in personnel activities for the period **July 1, 2016 through June 30, 2017**. The actual statistics for each action are attached as **Exhibit 2 (2.1) (2.2) (2.3) and (2.4)**.

Hires/Applicant Flow

The majority of applicants apply for positions as Administrative Support, Service-Maintenance or Skilled Craft Workers.

Hires

There were **72** full-time hires for the period. There were **33** females hired, or **46 percent** of the total. Blacks accounted for **20**, or **28 percent** of all hires. There were **30** Hispanics hired, or **42 percent**, and **7** Asians hired, or **10 percent**.

Promotions

There were **37** promotions during the period. There were 19 females promoted, or **51 percent** of the total. Blacks accounted for **18**, or **49 percent** of all promotions. There were **14** Hispanics promoted, or **38 percent**, and **1** Asian promoted, or **3 percent**.

It should be noted that the Promotion Table listed in **Exhibit 2.2** includes both promotions to other Job Groups and promotions within the same Job Group.

Terminations

LBT has a low turnover rate. There were **14** full-time terminations for the period. The termination rate for females was at **71 percent** while the termination rate for Blacks was at **43 percent**. The Service-Maintenance Job Group accounted for **9** terminations or **64 percent** of the total.

It should be noted that the above discussion of terminations, includes only involuntary terminations over the review period. The turnover for this Plan period of three years is a low **2 percent** annual turnover rate.

Training

LBT provided training to most of its workforce during this period. The training rate for females was at **31 percent** while the training rate for Hispanics was **41 percent** and for Blacks was at **33 percent**. The Service-Maintenance Job Group accounted for **63 percent** of the total training.

It should be noted that the above discussion of training, includes an employee attending multiple trainings over the review period.

Approximately 80 percent of LBT's employees are covered by a Collective Bargaining Agreement (CBA) with the Amalgamated Transit Union, Local 1277.

LBT is currently negotiating a CBA with the American Federation of State, County and Municipal Employees (AFSCME) District Council 36, which will cover approximately 50 Supervisors in the agency. An agreement is expected to be reached by mid-2018.

LBT will continue its efforts to ensure all employees are treated equally with regard to promotion and termination actions.

Compensation System Analysis

LBT has evaluated its compensation to determine whether there are gender, race or ethnicity-based disparities. The purpose of this evaluation is to identify potential areas where impediments to equal employment opportunity may exist. LBT has an open-door policy to all employees, and individual complaints about pay discrepancies are addressed. LBT will continue to assess its compensation practices to ensure all merit increases and starting salaries are based on fair and impartial principles. LBT will also continue to bring in outside consultants to review the wage scale.

As previously noted, the Amalgamated Transit Union (ATU), Local 1277, represents approximately 80 percent of the employee workforce. The CBA covers wages, hours, and working conditions. For those employees not represented by a labor union and/or not covered by a CBA, LBT periodically employs an independent consultant to perform audits of its compensation practices.

Development and Execution of Action-Oriented Programs

Recruitment for all levels of the organization via the internet has enhanced the success of effectively reaching minorities and females throughout the Southern California region. Although some print media is used, the internet has proven to attract larger numbers of minorities.

- Recruitment

The following list is an example of some of the print, electronic and social media LBT uses for recruitment:

- CalJobs.com
- CareerBuilder.com
- College Job Listing Service

- Conference of Minority Transportation Officials (COMTO)
 - EEO Journal
 - Facebook
 - Jobs/US/Diversity.com
 - Jobs Available
 - LinkedIn
 - Long Beach Transit Route and Schedule Guide
 - Long Beach Transit Website
 - Los Angeles News Group
 - Los Angeles Times
 - MilitaryExits.com
 - Monster.com (includes Diversity and Military)
 - Passenger Transport – American Public Transportation Association (APTA)
 - Professionals in Human Resources Association (PIHRA)
 - Southern California Institute for Jobs in Government
 - Southern California News Group
 - Transit Talent.com
 - The Veteran Journal
- LBT has a tuition reimbursement program to assist employees with educational and professional development to qualify for higher-level positions.
 - A job posting system is maintained throughout the facilities to ensure all employees are aware of job openings.
 - A Maintenance Apprenticeship Program for Mechanic positions is offered to all interested parties on an as-needed basis.
 - LBT has reviewed job applications and other pre-employment forms to ensure information requested is job related.
 - Employees involved in the hiring process have been trained on proper interview techniques.
 - Employees are encouraged to refer qualified applicants to the Human Resources department.
 - Job announcement flyers are distributed to:
 - California State University, Dominguez Hills
 - California State University, Fullerton
 - California State University, Long Beach
 - Long Beach City College

Job announcement flyers are distributed at Career Fairs such as:

- Cerritos City College
- Los Angeles Trade Technical College
- Long Beach City College

Monitoring and Reporting

Internal Audit and Reporting Systems

1. LBT maintains and monitors the records of applicant flow, hires, promotions, and terminations at all levels to ensure that non-discriminatory policies are carried out.
2. Reports are produced regularly in order to analyze the participation rates of minorities and females in personnel activity.
3. The results of this analysis are discussed with appropriate levels of management.
4. Management are periodically informed of the effectiveness of LBT's Program and progress toward achieving annual goals.
5. An internal audit has been conducted in the past by a third-party consultant to identify and suggest areas for improvement.

Monitoring and Reporting

- The EEO Officer regularly meets with LBT's recruiting team. These meetings are conducted to assess the success of recruitment efforts in the goal for female craft workers and female technicians which include expanded efforts on the internet such as minority, female and military sites, local colleges that have diesel mechanic programs to determine if females have enrolled, and other outreach efforts, such as providing an agency rewards program. The recruiting team maintains records of hiring, training, transfer and promotions of employees.
- The EEO Officer meets with the recruiters to review the EEO concurrence check list (**Exhibit 3**) prior to an offer being extended to a candidate.
- Complaints may be reported directly to the EEO Officer. If a complaint is reported to the Human Resources department, the EEO Officer is immediately informed and consulted as appropriate.
- The EEO Officer can readily meet with the CEO, Deputy CEO, and the Executive Leadership Team at their regular staff meetings, which occur biweekly, to report progress and challenges with the Program, as appropriate, and to discuss situations and recommendations for corrective action as may be warranted.
- The EEO Officer has access to the CEO, Deputy CEO and Executive Leadership Team to update on progress made to reach utilization goals. The EEO Officer provides training to various levels throughout the organization as needed.
- The EEO Officer maintains a file system and related records on EEO complaints.

- LBT has two transit-related subcontractors for its Dial-a-Lift services and Water Taxi services (Global Paratransit, Inc. and Catalina Channel Express, Inc., respectively). The EEO Officer periodically contacts its Human Resources department, Purchasing department, and the subcontractors directly, and has found that the contractors do not meet the threshold requirements as outlined in the EEO Circular.

Persons with Disabilities and Protected Veterans

Personnel policies call for equal opportunity and affirmative action for qualified persons with disabilities and veterans of the Vietnam era and other protected veterans in all personnel functions including recruitment, hiring, promotion, demotion, transfer, termination, layoff, compensation and training. These policies are implemented through the following:

Policy Dissemination and Responsibility for Implementation

Employment Practices for Persons with Disabilities and Veterans

1. The qualifications of known persons with disabilities and protected veteran applicants and employees are carefully considered to ensure that they enjoy equal opportunity for hire, promotion, transfer, training and so forth.
2. LBT has reviewed the physical and mental job qualifications to ensure that they are job related. Managers and supervisors involved in selection have been advised of these qualifications, and apply such qualifications only to the specific jobs to which the qualifications are related.
3. LBT provides reasonable accommodations to the physical and mental limitations of employees and applicants, unless such accommodation would impose an undue hardship on the conduct of its business. In determining whether an accommodation is reasonable, LBT considers such factors as:
 - Essential functions of the job
 - Initial cost of the accommodation
 - Cost of maintaining the accommodation
 - Safety
 - Production scheduling
 - Quality control
 - Space limitations
 - Number of disabled persons who might benefit from the accommodation
 - Availability of alternative jobs of equal status and pay for disabled persons
4. LBT does not reduce the amount of compensation offered because of disability income or other benefits received by an applicant or an employee.
5. LBT does maintain records related to complaints for at least one year.

6. When there is a question regarding an employee's disability status, LBT may request medical documentation or may request that the individual involved undergo a medical examination at LBT's expense.
7. LBT maintains an internal procedure for resolving questions or complaints. Employees and applicants are encouraged to take advantage of this procedure for questions that involve LBT's equal opportunity efforts for disabled persons.
8. The Plan for Persons with Disabilities and Protected Veterans is available for inspection upon request applicants and employees.

Complaint Procedures and Complaint Form

LBT's complaint procedures and complaint form are included in the following pages. The procedures were adopted in June 2016. The EEO Officer tracks EEO complaints and provides updates to the Deputy CEO and CEO on a quarterly basis. The EEO complaints received and tracked in FFY 2016 are included in the table below.

FY 2017 EEO Complaint Investigations								
EEO Complaint No. Issued	Area/Department	Date Reported to LBT	Date Received by EEO Officer	EEO Violation Found?	Date Report Issued	Date Notification Sent	Date Closed	Length of Investigation (Calendar Days)
001	S&Z/Maintenance	6/20/2016	6/27/2016	No	7/25/2016	7/27/2016	7/27/2016	30 Days
001								
001								
002	Grave Yard/Maintenance	6/30/2016	7/5/2016	Yes	7/25/2016	8/2/2016	8/2/2016	20 Days
003	Grave Yard/Maintenance	7/16/2016	7/17/2016	No	8/25/2016	8/29/2016	8/25/2016	39 Days
004	Quality Assurance	7/8/2016	7/8/2016	No	10/4/2016	10/5/2016	10/4/2016	88 Days
005	Service Delivery	8/2/2016	8/3/2016	No	8/15/2016	8/18/2016	8/18/2016	15 Days
006	Maintenance	7/25/2016	8/3/2016	No	8/30/2016	8/30/2016	8/30/2016	27 Days
007	Service Delivery	8/16/2016	8/24/2016	No	9/20/2016	10/27/2016	9/20/2016	26 Days
008	Service Delivery	8/24/2016	8/24/2016	No	8/30/2016	10/27/2016	8/30/2016	6 Days
LBT-CR-2016-009	Facilities	10/11/2016	10/11/2016	No	N/A - Exceeded Time Frame	N/A	10/12/2016	2 Days
010	S&Z/Maintenance	10/11/2016	10/11/2016	No	11/29/2016	12/2/2016	11/29/2016	52 Days
011	Utilities	10/24/2016	10/24/2016	No	12/2/2016	12/6/2016	12/2/2016	41 Days
012	Finance	11/14/2016	11/14/2016	No	Issued	N/A	11/15/2016	2 Days
001	TSD	1/3/2017	1/3/2017	No	2/6/2017	2/9/2017	2/9/2017	36 Days
002	Infrastructure	1/6/2017	1/6/2017	No	1/19/2017	1/19/2017	1/19/2017	13 days
003	TSD	2/10/2017	2/13/2017	No	4/5/2017	4/13/2017	4/13/2017	60 days
LBT-CR-2017-004	Maintenance &	5/9/2017	5/16/2017	No	6/30/2017	8/25/2017	6/30/2017	45 Days
LBT-CR-2017-005	TSD	5/22/2017	5/22/2017	No	6/27/2017	7/13/2017	6/27/2017	35 Days
LBT-CR-2017-006	Training	6/8/2017	6/8/2017	No	8/4/2017	8/9/2017	8/4/2017	56 Days

There were no EEO complaints filed prior to June 2016. There were 18 EEO complaints filed from July 2016–July 2017. Only one of the complaints was found to have an EEO violation and was forwarded to the CEO for action.



Equal Employment Opportunity (EEO) Complaint Procedures

When to File a Complaint:

Long Beach Transit is committed to the creation of a work environment that places a premium on equity, in an environment that offers its employees opportunities for professional and personal growth. We are also responsible for ensuring compliance with federal laws as they pertain to internal equal employment and external civil rights issues. If you believe you have been discriminated against, you may file an EEO Complaint by submitting an EEO Complaint form in person, electronically, via inter-office mail or via U.S. mail. EEO complaint forms are available outside the EEO Officer's office which is located at LBT1, in the public shared (L) drive (in EEO folder) and from all supervisors/managers.

What is the Timeline?

- Contact the Regulatory Compliance and Civil Rights Officer (EEO Officer) within **45 days** of the date of the matter alleged to be discriminatory; or
- In the case of a personnel action, (i.e., hiring, termination, promotion, transfer, etc.), within 45 days of the effective date of the personnel action, or the date that the individual knew or reasonably should have known it occurred

Please note that if you fail to contact the EEO Office within 45 days, your complaint may be dismissed as untimely. Submitting an EEO complaint does not prevent you from nor take the place of submitting a Charge of Discrimination with the United States Equal Employment Opportunity Commission (EEOC) and/or the State of California Department of Fair Employment and Housing (DFEH).

Complaint Process:

Once an internal EEO complaint is filed, the EEO Officer will begin an investigation and will notify Human Resources that an investigation is underway. The investigation may take up to 90 days. The EEO Officer will interview witnesses relevant to the investigation. Upon completion of the investigation, the EEO Officer will provide an investigation report with findings and recommendations to Long Beach Transit's Deputy CEO and CEO. When the investigation is completed, the complainant and the offender will receive a notification of the outcome of the investigation. The Deputy CEO and CEO will make decisions pertaining to discipline and enforcement of EEO policy violations. Investigations that do not find EEO policy violations, but do violate LBT's code of conduct will be referred to Human Resources.

EEO OFFICER CONTACT INFORMATION:

Aida B. Douglas
1963 E. Anaheim Street
ROOM 125
Long Beach, CA 90813
Direct office line: 562.489.8476
email: adouglas@lbtransit.com

Complaint Form



To Be Completed by the RCCRO:

Date and Time Rec'd: _____

Number Assigned: _____

EQUAL EMPLOYMENT OPPORTUNITY COMPLAINT FORM

NAME	EMPLOYEE NUMBER/JOB TITLE
DEPARTMENT	LOCATION
TELEPHONE NUMBER (Work) (Home)	DATE OF HIRE
SUPERVISOR	DATE OF ALLEGED INCIDENT

BASIS FOR COMPLAINT (CHECK APPROPRIATE BOX(ES)):

☐ Discrimination ☐ Harassment ☐ Retaliation

If you are alleging discrimination or harassment, please check the basis of your complaint:

<input type="checkbox"/> Race	<input type="checkbox"/> Religion	<input type="checkbox"/> Disability	<input type="checkbox"/> Sexual Orientation
<input type="checkbox"/> Color	<input type="checkbox"/> National Origin	<input type="checkbox"/> Veteran Status	<input type="checkbox"/> Genetic Information
<input type="checkbox"/> Sex	<input type="checkbox"/> Age	<input type="checkbox"/> Other (specify) _____	

Please identify persons whom you believe were treated more favorably than you were.

If you are alleging retaliation, please include the reason as well as the retaliatory action(s) taken against you:

Has the complaint identified above been discussed with your supervisor? ☐ Yes ☐ No

If yes, what action was taken? _____

Has the complaint identified above been reported to an external agency? ☐ Yes ☐ No

If so, which one(s)? _____

Please describe the specific action(s) that resulted in your allegation. Include name(s) and contact number(s) of witness(es). Attach extra sheet(s) if additional space is needed: _____

Resolution Sought (be specific): _____



I affirm that the allegations of the complaint are true to the best of my knowledge, information and belief. I will advise the EEO investigator of any changes in my telephone number and/or work location or division. I will cooperate fully with the processing of the complaint in accordance with LBT procedures.

Employee Signature

Date

Referred To: _____ Reason: _____ Date _____ Initials _____

Appendix



Notice of Non-Retaliation

Please be advised of the Notice of Non-Retaliation requirements under Title VII Section 704 (a) of Civil Rights Act, as amended, which states:

“It shall be an unlawful employment practice for an employer to discriminate against any of his employees or applicants for employment, for an employment agency to discriminate against any individual, or for a labor organization to discriminate against any member thereof or applicant for membership, because he has opposed any practice made an unlawful employment practice by this title, or because he/she **has made a charge, testified, assisted, or participated in any manner in an investigation, or hearing under this title.**”

Individuals found to have engaged in an act of retaliation will be subject to disciplinary action, up to and including termination of employment.

Posted: July 22, 2016

LBT FY 2018 WORKFORCE

