



# 2022-2026 FTA

Equal Employment Opportunity Program Plan Update



April 2022 Cyrenthia Jordan Metrocouncil.org



# EEO Program Plan Requirements

## Threshold Requirements

Any FTA applicant, recipient, subrecipient, and contractor who meet the threshold requirements must implement all Equal Employment Opportunity Program elements of a full plan:

- ✓ Employs 100 or more transit-related employees, and
- ✓ Requests or receives capital or operating assistance in excess of \$1 million in the previous Federal fiscal year, or requests or receives planning assistance in excess of \$250,000 in the previous Federal fiscal year.

❖ *FTA requires each applicant, recipient, subrecipient, or contractor that meets the Equal Employment Opportunity Program threshold requirements to submit an updated EEO Program every four years or as major changes occur in the workforce or employment conditions, whichever comes first. **The Council's Program ends on April 30, 2022 and the new update will take effect on May 1, 2022.***

# EEO Program Plan Requirements

## EEO Program Components

- ✓ Statement of Policy
- ✓ Dissemination
- ✓ Designation of Personnel Responsibility
- ✓ Utilization Analysis
- ✓ Goals and Timetables
- ✓ Assessment of Employment Practices
- ✓ Monitoring and Reporting Plan

# EEO Program Components

## Statement of Policy

FTA requires an agency's EEO Program to include a signed and dated EEO policy statement issued by the agency's CEO/GM covering all employment and personnel practices, including recruitment, hiring, promotions, terminations, transfers, layoffs, classification, compensation, training, benefits, and other terms and conditions of employment.

The Council's Statement of Policy is signed by the Regional Administrator – Mary Bogie

# EEO Program Components

- The Regional Administrator will sign the Policy Statement endorsing the AAP and provide written communications regarding the EEO program and implementation. This message identifies the location of the Plan and the employee's responsibility to read and understand it. It also indicates the employee's responsibility to support and implement equal opportunity.
- The Director of the Office of Equity and Equal Opportunity will provide a copy of the full plan and will meet with the Executive Management Team to discuss the plan and implementation at least semi-annually.
- The Council Division Directors and General Managers will review the plan with their respective senior managers.
- Managers and supervisors will be responsible for providing opportunities for employees to review the plan.
- Managers, supervisors, and employees will receive periodic Equal Employment Opportunity training which will include how to handle alleged acts of discrimination in the workplace and the complaint process.
- Office of Equity and Equal Opportunity will meet with employees and affinity groups to seek input on program implementation.
- Office of Equity and Equal Opportunity conducts equal opportunity/affirmative action training for new managers and supervisors after their hire, promotion, or appointment.
- A copy of the EEO Program, which includes the Policy Statement, will be posted on the Council's MetNet Office of Equity and Equal Opportunity webpage.
- Copies of the EEO Program will be available to all employees from the Office of Equity and Equal Opportunity, their manager, and the Council Library.
- The Policy Statement and EEO materials will be posted on bulletin boards, manuals, reports, in breakrooms, in personnel and operations manual, employee handbooks, and in employee orientation materials.

## Dissemination - Internal

- FTA requires agencies to publicize and disseminate their EEO policy statement by posting it in conspicuous locations so that employees, applicants, and potential applicants are aware of the agency's commitment to EEO. Agencies are required to disseminate their EEO policy internally and externally.

# EEO Program Components

## Dissemination - External

- A copy of the EEO Program, which includes the Policy Statement, will be posted on the Council's website. Printed copies are available to anyone who requests it. As requested, the Council will make the Plan available in alternative formats.
- The Council's website homepage, letterhead, publications, and all job postings include the statement "The Metropolitan Council is an equal opportunity employer." The Council will also ensure a representative ratio of diversity is on all marketing materials.
- Nondiscrimination and equal opportunity statements and posters are prominently displayed in common public areas. Examples of posters displayed include: Equal Employment Opportunity is the law, Employee Rights under the Fair Labor Standards Act, and the Americans with Disabilities Act Notice to the Public.
- A physical copy of the Council's EEO Program Plan is available to contractors, vendors, and members of the public at 390 N Robert St, St. Paul, MN 55101.



# EEO Program Components

## Designation of Personnel Responsibility

- **Regional Administrator – Mary Bogie**
  - Provide executive leadership of the Council’s diversity, equal opportunity and affirmative action programs, and compliance with all federal and state laws and regulations.
- **Director Office of Equity and Equal Opportunity, EEO Officer – Cyrenthia Jordan**
  - Implement, direct, and manage the Council’s diversity, affirmative action and equal opportunity policies and programs.
- **Director Human Resources – Marcy Syman**
  - Develop, recommend and administer a human resources system that is consistent with and promotes diversity, equal opportunity and affirmative action objectives.
- **Americans with Disabilities Act Title I Coordinator – Deborah Aebi**
  - Ensure the Council’s compliance with the ADA Title I – Employment, in accordance with the ADA - as amended, and the Minnesota Human Rights Act.
- **Americans with Disabilities Act Title II coordinator – Cyrenthia Jordan**
- **Senior Managers and Supervisory Staff**
  - Manage work unit in accord with diversity, equal opportunity and affirmative action policies and plan and the agency’s commitment to affirmative action and equal opportunity.
- **All Employees**
  - All employees are responsible for conducting themselves in accordance with the Metropolitan Council’s policies on equal employment opportunity, affirmative action, discrimination, harassment, inappropriate behavior and respectful workplace.

# EEO Program Components

**Utilization Analysis:** This analysis is based on categories and data used in the Equal Employment Opportunity Commission EEO-4 report and consists of a workforce analysis and an availability analysis.

The workforce analysis includes the number of employees and salary ranges for each job category for the following subcategories for men and women:

- White (not Hispanic or Latino)
- American Indian/Alaska Native (not Hispanic or Latino)
- Black or African American (not Hispanic or Latino)
- Hispanic or Latino
- Asian (not Hispanic or Latino)
- Native Hawaiian and Other Pacific Islander (not Hispanic or Latino)
- Two or more races (not Hispanic or Latino)

## EEO Job Categories

Number	Category
1	Officials and Administrators
2	Professionals
3	Technicians
4	Protective Service Workers
5	Paraprofessionals
6	Administrative Support Workers
7	Skilled Craft Workers
8	Service-Maintenance Workers



# EEO Program components

## Availability Analysis

- The Council must compile information on the availability of minorities and women in the workforce at large and analyze participation rates of minorities and women at the various levels of the workforce in comparison with their availability in the relevant labor market. The Council has defined the relevant labor market as the Twin cities Metropolitan Area.
- The Council used the United States Census Bureau's 2014-2018 American Community Survey, which is the most current statistical information available at the time of developing this Equal Employment Opportunity Plan.
- The utilization analysis identifies job categories that have an underutilization and/or a concentration of minorities and women in relation to their availability in the relevant labor market.
- Underutilization means there are fewer people of color and females in a particular EEO job category than expected compared to their availability in the job market.
- Concentration means there are more females and minorities in a job group than their relative proportion in the labor market. The AAP is designed to increase the representation of affected groups.

# EEO Program Components

## Utilization Analysis Results:

- In the **Officials and Administrators** job category Asian men and white women are underutilized.
- In the **Professionals** job category white, black and Hispanic women are underutilized.
- In the **Technicians** job category white and Asian women are underutilized.
- In the **Protective Service** job category white and black women are underutilized.
- In the **Paraprofessional** job category white women are underutilized.
- In the **Administrative Support** job category white and Hispanic women are underutilized.
- In the **Skilled Craft** job category Hispanic men, Asian men, white, black, Hispanic, and Asian women are underutilized.
  - Is where the Council has the most underutilization
  - The workforce is made up of over 80% white men and women
  - Where the Council employs workers from trade unions
- In the **Service Maintenance** job category Hispanic men, white, Indigenous, Hispanic, and Asian women are underutilized.
- White men are concentrated in all top (salary) job categories with the exception of the front-line occupations and Administrative Support professionals.
- White men and women represent over 80% of the Council's workforce in all top (salary) job categories except for the front-line occupations and Administrative Support professionals.
- White women are representative at a ratio of 4 to 5:1 compared to all other women combined in all top (salary) job categories except for the front-line occupations and Administrative Support professionals.

EEO Category	Areas of Underutilization	Year 1	Year 2	Year 3	Year 4
Officials & Administrators	Asian male, White female	Asian Male, 1 White Female, 5	Asian Male, 2 White Female, 5	Asian Male, 2 White Female, 5	Asian Male, 1 White Female, 5
Professionals	White female, Black female, Hispanic female	White female, 5 Black female, 0 Hispanic female 0	White female, 5 Black female, 1 Hispanic female 1	White female, 9 Black female, 1 Hispanic female 1	White female, 10 Black females 0 Hispanic female 0
Technicians	White female, Asian female	White female, 4 Asian female, 2	White female, 4 Asian female, 2	White female, 4 Asian female, 2	White female, 3 Asian female, 1
Protective Service	White female, Black female	White female, 2 Black female, 0	White female, 2 Black female, 1	White female, 1	White female, 3
Paraprofessionals	White female	No anticipated hires	No anticipated hires	No anticipated hires	No anticipated hires
Administrative Support	White female, Hispanic female	White female, 5 Hispanic female, 0	White female, 5 Hispanic female 2	White female, 5 Hispanic 1	White female, 3 Hispanic female, 1
Skilled Craft	Hispanic male, Asian male, White female, Black female, Hispanic female, Asian female	Hispanic male, 3 Asian male, 1 White female, 3 Black female, 1 Hispanic, 1 Asian female, 2	Hispanic male, 3 Asian male, 1 White female, 3 Black female, 1 Hispanic, 1 Asian female, 2	Hispanic male, 3 Asian male, 1 White female, 3 Black female, 1 Hispanic, 1 Asian female, 2	Hispanic male, 3 Asian male, 1 White female, 3 Black female, 1 Hispanic, 1 Asian female, 2
Service Maintenance	Hispanic male, White female, Indigenous female, Hispanic female, Asian female	Hispanic male, 10 White female, 20 Indigenous female, 0 Hispanic female, 8 Asian female, 0	Hispanic male, 10 White female, 20 Indigenous female, 1 Hispanic female, 8 Asian female, 1	Hispanic male, 10 White female, 20 Indigenous female, 1 Hispanic female, 8 Asian female, 1	Hispanic male, 10 White female, 20 Indigenous female, 0 Hispanic female, 8 Asian female, 0



# EEO Program Components

## Assessment of Employment Practices

- Of the 455 vacancies filled, 147 were filled internally (32.3%)
- Of the 74 manager vacancies filled, 58 were promoted from within
- Council promoted women above their percentage in the Council-wide workforce and promoted people of color below their percentage in the Council-wide workforce for ES and MT
- 110 employees were promoted in 2021 – 2.8% (includes reclassification)
- Applications down by 5300 pre-pandemic; % of applicants of color and women decreased
- POC new employees increased as % in 2021
- Hired women and applicants of color at % rates higher than % rates in total applications
- Women and POC are leaving our Agency at rates higher than their representation