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Mobile Transit Management
D/b/a

The Wave Transit System

Equal Employment Opportunity
Program
(UPDATE)

Revised: June 2014

Booker Tyrone Parker, General Manager

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EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT

Mobile Transit Management d/b/a The Wave Transit System is firmly committed to promoting and maintaining a work environment that ensures equality of opportunity for all of our employees. It is an equal opportunity employer and is committed to a policy of Equal Employment Opportunity (EEO / AAP) and to the principles of affirmative action. This commitment is exemplified in all of our management practices as well as in our day-to-day management decisions.

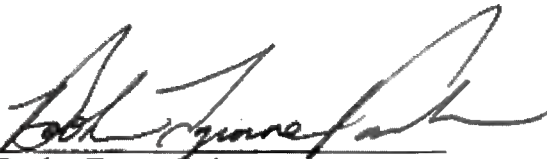
It is the continuing policy of The Wave Transit that it is committed to equal employment opportunity for all persons, regardless of race, color, creed, national origin, sex, age, religion, medical condition or disability.

The Wave Transit is also committed to undertaking an affirmative action program, including setting goals and timetables, in its effort to overcome the effects of past discrimination on minorities and women. Thus, it is the policy of The Wave Transit to provide equal consideration and treatment in all aspects of employment, including recruitment, selection, promotions, discipline, terminations, transfers, layoffs, compensation, training, benefits and all other terms and conditions of employment without regard to race, color, creed, national, sex, age, religion, medical condition or disability. The Wave Transit therefore believes that successful achievement of EEO / AAP goals will provide benefits to The Wave Transit through fuller utilization and development of previously underutilized human resources.

The Wave Transit will ensure that employees who believe that they have been discriminated against are fully able to exercise their right to file an EEO / AAP complaint, a grievance or otherwise raise their concerns without fear of reprisals for conferring with management or filing a complaint. Acts of reprisals against any employee will not be tolerated. The Wave Transit's civil rights complaint procedures are outlined in Exhibit 2 of the The Wave Transit EEO / AAP/Affirmative Action Plan. Employees are advised to review these procedures to determine appropriate steps to take in the event of a possible violation of this policy. In any instance where an employee believes this policy has been violated, the employee is encouraged to consult with The Wave Transit's EEO / AAP Officer concerning such alleged violations.

It is the policy of The Wave Transit that the work performance of all directors, managers, supervisors and the EEO / AAP Officer will be evaluated, in part, based on their EEO / AAP/AAP efforts and results.

The responsibility for implementing the EEO / AAP program is assigned to Mr. Bruce Rockstad, the EEO / AAP Officer. The Wave Transit directors, managers and supervisors share in the responsibility to implementing the EEO / AAP Program. The Wave Transit has designated specific responsibilities to these various staff members to ensure that the EEO / AAP program focuses on all components of The Wave Transit's employment practices. In addition, they are reminded of their responsibility to prevent, document and promptly correct discriminatory and harassing conduct in the workplace.


Booker Tyrone Parker
General Manager

6/11/14
Date

DISSEMINATION OF THE EEO / AAP PROGRAM

Effective implementation of an EEO / AAP Program requires identification of specific procedures that will be used to disseminate the EEO / AAP Program. Therefore, The Wave Transit has identified the following steps to ensure effective internal and external communication regarding the EEO / AAP Program, its related EEO / AAP policies and the responsible individual(s).

INTERNAL DISSEMINATION

Internal dissemination is the communication of the EEO / AAP Program to all employees through steps, which include, but are not limited to, the following:

- Schedule and conduct annual meetings with department heads to explain the intent of the policy and individual responsibility for effective implementation.
- Conduct periodic informal meetings of the transit system to discuss the EEO / AAP Program with all employees
- Conduct meetings with minority and female employees to get their suggestions in implementing and refining the EEO program.
- Discuss the EEO / AAP policy statement thoroughly in new employee orientation sessions. New employees will be given a copy of the EEO / AAP Policy statement to be included in the employee hand book, and sign an acknowledgement of receipt of the policy. Responsible Personnel: Department head / EEO Officer.
- Post the EEO / AAP policy statement, along with required state and Federal EEO / AAP regulations, on The Wave Transit's bulletin boards and other areas designated for general reading and information, including areas accessible to job applicants
- Picture men and women, minorities and non-minorities, when employees are featured in The Wave Transit's in-house publications, annual reports and newsletters. Responsible Personnel: All Department heads.

EXTERNAL DISSEMINATION

External dissemination is the communication of the EEO / AAP/AAP to various groups and organizations throughout the community through steps, which include, but are not limited to, the following:

- Inform all recruiting sources in writing of The Wave Transit's EEO / AAP policies, including the policy statement, on an annual basis. Responsible Personnel: Human Resources Director.
- Encourage recruitment sources to refer minorities, women, and persons with disabilities as job applicants. Responsible Personnel: Human Resources Director.

- Include on all employment applications and job postings The Wave Transit's EEO / AAP policy clause which states that all qualified applicants will be considered, regardless of race, color, creed, ancestry, national origin, gender marital status, sexual orientation, religion, age, veteran status or disability.
- Include the EEO / AAP policy clause in writing with recruitment sources, referral agencies, and organizations that may be of assistance in making referrals or in making opportunities at The Wave Transit known to applicants. Responsible Personnel: Human Resources Director.
- Include the provision "The Wave Transit is an Equal Opportunity Employer and does not discriminate on the basis of race, color, creed, ancestry, national origin, gender marital status, sexual orientation, religion, age, veteran status or disability" in all recruitment advertising. Responsible Personnel: Human Resources Director.
- Include "Equal Employment Opportunity and Affirmative Action Employer," in its entirety, in all purchase orders and contracts. Responsible Personnel: All department heads.
- Notify minority and women's organizations, community agencies, community leaders, of The Wave Transit's EEO / AAP policy statement in writing. Responsible Personnel: Director of Human Resources.
- Picture minority and non-minority men and women and persons with disabilities in all relevant advertising or The Wave Transit-sponsored publications prepared for external dissemination. Responsible Personnel: All department heads.
- Public media sources, for example; radio and television stations, newspapers, magazines, and other journals (especially those oriented to the handicapped and minority populations). ALL advertisements for personnel will include a statement that the recipient is an EEO employer.

Designation of Personnel

As part of its efforts to ensure equal employment opportunity to all individuals, The Wave Transit has designated specific responsibilities to various staff to ensure that the EEO / AAP Program focuses on all components of The Wave Transit's employment activities. To that end, the General Manager, Human Resources Director (EEO / AAP Officer), and Department Heads will continue to undertake their EEO / AAP Program responsibilities as further described below.

SEE ATTACHMENT: ORGANIZATIONAL CHART

GENERAL MANAGER

Responsibility and accountability for implementing the EEO / AAP Program rests with the General Manager. It is the policy of The Wave Transit System for The General Manager to be responsible for designating appropriate personnel with the responsibility for overseeing, administering, implementing and monitoring The Wave Transit's EEO / AAP Program; Ensure that these personnel are identified in writing by name and job title; provide leadership and personal direction that assures total involvement and commitment to equal employment opportunity activities through The Wave Transit's EEO / AAP Program; and serve as the EEO investigating officer in the event of conflict. Furthermore, **ALL employees of the Wave Transit System will have access to the General Manager in the event of an apparent conflict with the designated EEO Officer.**

EQUAL EMPLOYMENT OPPORTUNITY OFFICER

Mr. Bruce Rockstad, the Director of Human Resources is the designated Equal Employment Opportunity Officer. With regard to EEO / AAP, he is responsible for the overall management, implementation, and development of the EEO / AAP, under the daily supervision of the General Manager. The EEO Officer has direct access to the General Manager on all matters related to the EEO / AAP. The Equal Employment Opportunity Officer ensures compliance to all relevant EEO / AAP policies and procedures through department heads at the Wave Transit System. Successful implementation of this program is a basis for evaluating the Equal Employment Opportunity Officer's effective work performance. Note: Because the Wave Transit System is a small grantee, management officials must assume the roles of more than one position. **THERE ARE NO CONFLICTS OF INTEREST BETWEEN THE TWO (2) POSITIONS.** The Equal Employment Opportunity Officer's responsibilities include, but are not limited to, the following:

- Developing and recommending the EEO / AAP policy, a written EEO / AAP program, and internal and external communication procedures.
- Assisting management in collecting and analyzing employment data, identifying problem areas, establishing and monitoring goals and timetables, development of programs to achieve goals.
- Designing, implementing and monitoring internal audits and reporting systems to measure the program's effectiveness.
- Reporting to the General Manager periodically on the progress of each unit in relations to The Wave Transits goals.
- Serving as a liaison between The Wave Transit System, federal, state and local governments, regulatory agencies, disabled represented agencies, women organizations and other community groups.
- Assuring current legal information, with regard to affirmative action is disseminated to responsible parties.
- Assisting with the recruitment of minority, disabled and women applicants; establish outreach sources for use by hiring officials.

- Concurring in all hires and promotions; and
- Processing employment discrimination complaints

Department Heads

In their direct day-to-day contact with The Wave Transit employees, department heads have assumed certain responsibilities to help The Wave Transit ensure compliance with equal employment opportunity laws and the effective implementation of the EEO / AAP/AAP. These include, but are not limited to, the following:

- Assist in ensuring that The Wave Transit, as an employer, adheres to the stated policy of equal employment opportunity and affirmative action, and monitor the application of equal employment opportunity policies;
- Participate in periodic discussions with supervisors and employees to ensure EEO / AAP policies are being followed;
- Participate in the review and/or investigation of complaints alleging discrimination;
- Review the qualifications of job-related employment practices for all transfers and promotions to ensure equal opportunity;
- Provide support for career mentoring, coaching, and counseling within their respective departments for employees;
- Respond to identified problem areas and establish procedures, goals, and objectives to address and resolve such problems;
- Assist supervisors in arriving at solutions to EEO / AAP problems;
- Assist in the review and implementation of revisions to EEO / AAP policies and procedures
- Participate in periodic audits to ensure they are not in violation of federal or state laws and regulations;
- Involve with local minority and community organizations, women's and disabled groups, community action organizations and community service programs such as, Independent Living, Mobile Association for Retarded Citizens (MARC), Volunteers of America, Goodwill Easter Seals, Mobile Workforce Development, Alabama Career Center, Mobile Area Chamber of Commerce, etc.
- Support The Wave Transit-sponsored educational, training, recreational, and social activities to ensure that all employees are encouraged to participate in accordance with nondiscrimination policies.
- Support and assist the EEO / AAP Officer in developing, maintaining, and successfully implementing the EEO / AAP;
- Take action to prevent, report, and remedy any illegal harassment of employees.
- Ensure that all interviews, orders of employment, and/or wage commitments are consistent with The Wave Transit's EEO / AAP/AAP

ASSESSMENT OF WORKFORCE

GENERAL INFORMATION AND SUMMARIZATION

The total population in Mobile County grew from 413,002 in 2010 to 414,079 in 2013 (+0.3%). The percentage of the non white population remained constant at 37.2% in the year 2010. The percentages of females was 52.1 % in 2010. Between 05/18/2014–05/18/2014, The Wave Transit employed 133 regular employees, of which 122 are minorities and 62 are females.

The Wave Transit System's Workforce is broken down into three (3) categories:

Operators

Minority representation was 95.5% with 49.4% being Females.

Maintenance

Minority representation was 78.9%

Note: Because of the nature of the maintenance department positions it difficult to attract qualified females and as result there are two (2) females in the maintenance department.

Administration

Minority representation was 88.00% with 60% being Female.

EMPLOYMENT PRACTICES

Identification of Problem Areas

The following underutilizations have been identified and will remain the focus of coordinated and ongoing affirmative action efforts:

- **Skilled Crafts**. Women, Hispanic groups, Asian/Pacific Islanders and American Indians/Alaskans Natives

Recruiting and External Selection Procedures

The primary source of applicants are walk-in applications, however cooperative efforts between The Wave Transit System and employment services such as Alabama State Employment Offices are additional applicant resources. All job openings at The Wave Transit are listed and / or published at both the GM&O Transportation Center (110 Beauregard Street, Mobile, AL.) and the Beltline location (1224 W. I-65 Service Road, South), the Mobile Press Register and the Wave Transits web site at www.thewavetransit.com.

Applicants are also recruited through job / career fairs, and the local unemployment office.

Promoting Procedures

Job promotion opportunities are published internally and all employees are eligible to apply without regard to race, color, creed, religion, national origin, gender, age medical condition or disability. Job promotions are based on job performance, skills and education.

Transfer Procedures Employees seeking a transfer are required to submit a request to the Director through their Supervisor. Transfers are based on the availability of an opening of a similar position in the desired location.

Procedures and Practices regarding Wages, Salary Levels and Other Forms of Compensations and Benefits

The Wave Transit determines salaries and wages based on benchmarking of similar jobs in other local government agencies and public transportation organizations. Salary ranges and pay grades have been assigned to each position and are reviewed and approved by the The Wave Transit and City of Mobile. This information is included in the annual budget, in the form of a salary plan. Any adjustments to the salary plan occur through the budget process.

All proposed cost of living (COLA) and merit increases are initiated by the General Manager and reviewed and approved by the City of Mobile as part of the budget process. Merit increases are allocated by Department heads, according to predetermined standards and guidelines with final approval by the General Manager.

Employees are to be paid compensation in accordance with applicable laws. Employee salaries are quoted as annual or hourly amounts. Employees are paid bi-weekly by check or by direct deposit. Paycheck includes work previously completed in the last two weeks.

Deductions required by state and federal law are withheld from the employee's paycheck as well as deductions for insurance premiums or retirement contributions, or any other benefits for which the employee has authorized deductions, in whole or in conjunction with The Wave Transit, if any. Deductions may be made to a final paycheck for all items agreed to by the employee and The Wave Transit.

Disciplinary Procedures and Termination Practices

The Wave Transit desires to employ competent employees with acceptable job performance. The Wave Transit provides opportunities for employee training to enhance job performance. Employees are required to participate in seminars, conferences and trainings as determined by their supervisor.

The General Manager and Department heads hire, evaluate, discipline and discharge employees.

The General Manager, which is a private contractor is hired, disciplined, evaluated and discharged by the City of Mobile. Employment of the General Manager is at the will of the City of Mobile.

The General Manager and department heads prepare job descriptions for each employee. Employee job performance is evaluated by the General Manager and Department heads annually.

Employees may be disciplined to improve job performance and for failure to abide by these policies.

When possible and appropriate, disciplinary action will follow a progressive sequence. The normal sequence of action is:

- Step 1: Oral Counseling**
- Step 2: Written Reprimand**
- Step 3: Suspension without Pay**
- Step 4: Dismissal from employment**

The purpose of progressive discipline is to ensure that the employee is fully aware of any performance deficiencies that exist and to provide the employee with a reasonable opportunity to correct such deficiencies. Employees will be given an opportunity to respond to any intended disciplinary action on the part of the supervisor either orally or in writing.

Supervisory and management personnel may omit any stage of the above process if, in their opinion and with concurrence of the department head and General Manager, the problem cannot be corrected by a less severe form of disciplinary action.

Oral Discipline

An oral counseling between the immediate supervisor and the employee is the appropriate disciplinary action in the following circumstances:

- a. occurrences of unacceptable deviations from established rules or regulations;
- b. establishment of an apparent pattern of behavior or performance which is contrary to the work goals of the employee's work group or department;
- b. decline or deterioration in previously acceptable conduct or work quality to levels below acceptable standards; and/or other
- c. instances of poor performance or conduct which interfere with the operation of the work unit or its personnel, but which, by themselves, are not sufficiently serious to warrant a written reprimand.

The oral counseling will be documented by the supervisor, to provide a written record for the counseling and to provide the employee with a reminder of the work standards expected. Documentation of an oral counseling should be kept in the Supervisor's file for future reference, but will not be placed in the employee's official personnel file. In addition, an oral counseling cannot be appealed through the grievance process.

Written Reprimand

A written reprimand is the

- a. failure of the employee to carry out agreed upon corrective actions to establish acceptable work or conduct standards after oral counseling; appropriate disciplinary action in the following circumstances:

- b. minor damage to or loss of The Wave Transit property because of the employee's negligence; and/or
- c. other deficiencies in performance or conduct which are serious enough to warrant more stringent action than a personal conference.

The written reprimand will be prepared by the employee's immediate supervisor, and, prior to being delivered to the employee, must be approved as to form by the Human Resources Officer and General Manager. A copy of the prior, documented oral counseling, if any, will be attached to the written reprimand. A copy of the written reprimand signed by the immediate supervisor and the [redacted] employee (or witness) will be given to the Human Resources Officer and placed in the employee's official personnel file.

If the employee disagrees with the cause or content of the written reprimand, the employee may grieve this disciplinary action in accordance with The Wave Transit's Grievance Policy, outlined in the policies and procedures manual. Grievances must be submitted within #5calendar days. They are to be submitted in writing to the General Manager, unless the grievance involves an action taken by the General Manager. In those instances the grievance would be directed to the HR/EEO Officer.

Suspension Without Pay

Temporary suspension without pay, not to exceed #3 working days, is the appropriate disciplinary action in the following circumstances:

- a. repetition of actions for which a written reprimand has been previously issued;
- b. major damage to or loss of The Wave Transit property through negligence or willful misuse by the employee; and/or
- c. performance or conduct which is severe in nature and interferes with The Wave Transit operations or with performance of duties by other personnel.

Department heads may authorize suspension without pay after receiving approval of the General Manager, or his designee. If the employee is to lose five or more days of pay, they will be subject to a disciplinary hearing. Once a determination has been made, the employee is to receive a written notice clearly stating the following:

- a. the reason(s) for the suspension;
- b. the duration of the suspension, including beginning and ending dates and times;
- c. notice of the employee's right to appeal the suspension with an outline of procedures to be followed if an appeal is desired; and
- d. notice that if the employee fails to return to work as expected following the suspension and fails to notify the supervisor of an acceptable reason for the failure to return to work, the employee will be considered to have terminated employment voluntarily.

If the employee disagrees with the suspension without pay, the employee may grieve this disciplinary action in accordance with The Wave Transit's Grievance Policy, outlined in the

policies and procedures manual. Grievances must be submitted within #10 calendar days. They are to be submitted in writing and sent to the General Manager, unless the grievance involves an action taken by the General Manager. In those instances the grievance would be directed to HR/EEO Officer.

Dismissal From Employment

Each potential case for dismissal from employment will be considered on its individual merits. Generally, however, dismissal from employment may be the appropriate action in any of the following circumstances:

- a. incompetence (including lacking the requisite skills or abilities to perform the assigned job);
- b. theft;
- c. physical assault against employees, customers, or visitors;
- d. violation of law, either on or off duty, resulting in a felony conviction;
- e. commission of an act of moral turpitude, including sexual harassment of students, visitors, or other employees;
- f. gross neglect of assigned duties;
- g. insubordination, willful disobedience, and/or refusal or failure to follow directives or perform work properly assigned by a supervisor;
- h. dishonest actions, including falsification of information to secure a position with The Wave Transit or falsification or intentional destruction of any other The Wave Transit records;
- i. gross or repeated failure to abide by rules and regulations of The Wave Transit, or of federal, state, or local laws; mismanagement of a position by action, inaction, or neglect that places the lives or property of others in jeopardy; and/or
- j. substandard performance or conduct which continues despite attempts at correction through discipline or counseling.

Department heads may authorize dismissal after obtaining approval from the General Manager, or his designee.

Predismissal and Predisciplinary Action Hearings

The Wave Transit will conduct a hearing before taking any disciplinary action which would result in the coworker's losing a right (money or status) through demotion, suspension without pay for more than five days, or dismissal. This policy applies to all full-time coworkers who have completed their initial probationary period, and part-time regular coworkers who have

completed at least six months of service and who are employed year-round. Other part-time, seasonal, or temporary workers are not covered.

The following steps should be followed when conducting a pre-disciplinary hearing:

- a) The supervisor or manager will discuss the situation with the General Manager and the Human Resources Officer prior to conducting the hearing.
- b) Provide notice to the coworker of the hearing, either orally or in written form, same day notice is fine. Tell the employee that you are holding a hearing to discuss a proposed personnel action and state whatever that proposed action may be.
- c) Invite the Human Resources Officer or other neutral person designated by the General Manager as a "neutral advisor". This advisor is a witness not only on behalf of The Wave Transit as to the impartial, informal hearing but also serves as a witness to what the employee is told and to the employee receiving a full and fair opportunity to present his/her side of the situation.
- d) Conduct an informal, objective, impartial hearing. Present the charges and provide a full opportunity for the coworker to present defenses or reasons against the proposed personnel action.
- e) Do not make a decision at the end of this particular hearing, and do not have a pre-prepared letter concerning the disciplinary action, since this is perceived under the law as being a preconceived decision. Wait at least 24 hours before making a final decision. Either record the hearing or take notes of the hearing. The recording or notes are the property of The Wave Transit and do not have to be given to the coworker. The employee may record the meeting as well.
- f) If the final decision is to take disciplinary action, put that decision in writing listing specific reasons for the decision being made. A Notice of Personnel Action form may be used for this purpose. Give a copy of the written decision to the coworker and send a copy to the Personnel Department for inclusion in the coworker's personnel record.
- g) Notify the disciplined coworker that provisions of the formal grievance procedure are available after any suspension, demotion, or dismissal has taken place. The pre-disciplinary hearing does not replace the formal grievance hearing.

The Department head will give written notice to the employee of the intent to dismiss the employee from employment or to suspend for more than five working days consisting of the following information:

- a) The Notice of Charges (What the employee did or failed to do).
- b) The particular rule(s) the employee allegedly violated.
- c) The possibility of disciplinary action if the department substantiates the allegations.
- d) The date, time, and place of the hearing during which a discussion of the allegations will take place. The department must allow a reasonable time.
- e) The employee's right to receive assistance from another person of his or her choosing.

If the employee submits a response either orally or in writing, their supervisor will take into consideration any information submitted in the final decision. The employee's supervisor will respond to the employee in writing. An employee is not required to respond and does not waive any rights under this policy by not responding prior to dismissal.

The department director will conduct the hearing before discharge/suspension and will be accompanied by another supervisor or management employee. The hearing is considered part of the final stage of fact finding and a decision should not be rendered until at least 24 hours after the hearing has concluded and any new information has been considered. See Article 2, Section 10 of the policies and procedures manual for additional guidance on the hearing process.

The final decision should be provided to the employee in writing and within 10 working days. The letter is to be sent to the employee's place of residence via certified mail.

If the employee disagrees with the cause or content of the written reprimand, the employee may grieve this disciplinary action in accordance with The Wave Transit's Grievance Policy, outlined in the policies and procedures manual. Grievances must be submitted within 15 calendar days. They are **to** be submitted in writing and sent to the General Manager, unless the **grievance** involves an action taken by the General Manager. In those instances the grievance would be directed to HR/EEO Officer.

Administrative Leave With or Without Pay

Under certain circumstances it may be necessary to restrict an employee immediately from performing duties at the work site. The circumstances usually involve potential danger to the employee, co-workers, or the public, or the employee's inability to discharge assigned duties satisfactorily. Because of the need for immediate action, the decision to suspend an employee in such circumstances shall be the responsibility of the supervisor, or Department head.

When circumstances of this nature arise, the employee shall be placed on an administrative leave with or without pay pending the investigation of the incident or incidents involved. The initial determination to place the employee on administrative leave with or without pay shall be made by the supervisor, or department director.

An employee placed on administrative leave with or without pay is not considered to be in a disciplinary mode during the administrative leave period. During an administrative leave, an employee is expected to refrain from coming onto The Wave Transit property at any time unless requested to do so by the employee's supervisor.

Any employee that has completed their probationary period and are being considered for a period and are being considered for a non-paid suspension of five days or more must be provided a predisciplinary hearing, as outlined in The Wave Transit's policies and procedure manual.

Based upon the outcome of the investigation, the employee may be allowed to return to his/her normal duties or may be subject to disciplinary action. The placement of an employee on administrative leave with or without pay shall be immediately reported to the department director, the Human Resources Officer and the General Manager.

Whenever an employee is cleared from administrative leave and found to be free of any wrong doing, they are to be immediately placed back in an active status and the department director, the Human Resources officer and the General Manager are to be notified. If the employee's non-paid leave resulted in a delay of the employees pay check processing, the employee's manager or supervisor should notify the Finance Department so arrangements can be made to cut a manual check.

ADDITIONAL LANGUAGE FOR THE WAVE TRANSIT SYSTEMS POLICY GUIDELINES

EEO Claim Processing Timeline

In the event that an EEO claim is filed against a Wave Transit System employee or the agency itself, the process for filing such claim and the applicable timelines are as follows:

(Note: Timeline/deadlines exclude, Saturday, Sunday, and locally recognized holidays.)

TMM's Internal Handling of EEO Claim

1. The EEO / AAP Officer must receive a formal written letter of complaint detailing specific aspects of the alleged discrimination activity (including date, time, name of parties, witnesses, etc.) within 45 days of the subject incident.
2. The EEO/AAP Officer will acknowledge receipt of the formal written complaint within 10 days of being served.
3. The EEO / AAP Officer will meet with claimant within 20 days of the acknowledgement of receipt of the formal written complaint.
4. The EEO/AAP Officer will initiate an internal investigation of the alleged charges, and will notify claimant of the EEO Officer's initial findings within the 45 days immediately following the first meeting with claimant.
5. Claimant has 15 days from the date of the EEO /AAP Officer's initial findings to accept or refute/appeal the information contained therein.
6. Should claimant accept the EEO /AAP Officer's findings or withdraw his/her claim for any other reason, the matter will terminate and the file will be closed.
7. Should claimant desire to refute/appeal the matter further, he/she will have 15 days from the date of the initial findings to request an administrative review by General Manager.
8. The General Manager will have 90 days from the date of receipt of claimant's request for further administrative review within which to render a final notice of transit agency decision. During this time-frame, claimant may be asked to participate in mediation or alternative dispute resolution proceedings, both of which claimant has the right to decline.
9. The Wave Transit System will make every effort to resolve the matter within 120 to 180 days of receipt of claimant's written letter of complaint.

Claimant's Right to Seek External Remedies

10. Should claimant desire to appeal the matter further he/she has the right to initiate a claim directly with any one the below-listed governmental agencies within 30 days of The Wave Transit System's final notice of transit agency decision:

At the State Level:

**Alabama Department of Human Resources
Equal Employment and Civil Rights Division**
50 N. Ripley Street
Montgomery, AL 336130
Phone: (334) 242-1550

At the Federal Level:

Equal Employment Opportunity Commission (EEOC)
Ridge Park Place
1130 22nd Street South, Suite 2000
Birmingham, AL 35205
1-800-669-4000

or

Federal Transit Administration (FTA)
1200 New Jersey Avenue, SE
East Building, 5th Floor TCR
Washington, DC 20590

Nothing in the above language should be construed as legal advice, and claimant has the right to seek local union or legal counsel at any time during this process.

Monitoring and Reporting

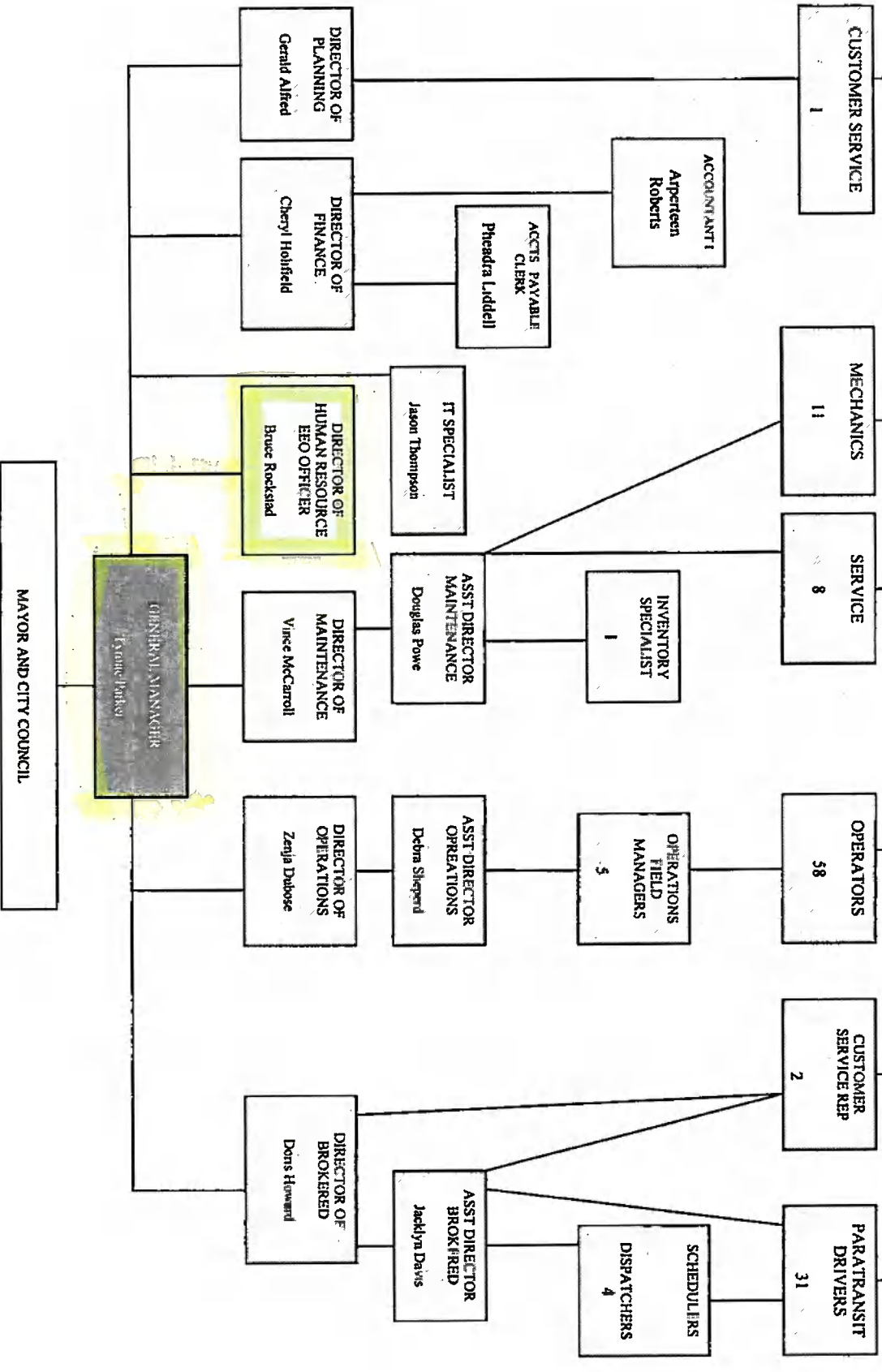
The Wave Transit System has implemented an internal monitoring and reporting procedure in 1998 in order to provide for the periodic review of employment levels and to evaluate the progress made in ensuring equal opportunity employment and to identify employment areas requiring improvement.

The Wave Transit System will monitor and maintain quarterly status reports by job classification. The reports will be reviewed by the General Manager in conjunction with the EEO Officer. In addition, the EEO program will be reviewed and updated as needed annually.

Attachments

ORGANIZATION CHART FOR THE WAVE TRANSIT SYSTEM

1.1 MILLION CUSTOMERS





TRANSIT SYSTEM

Ride the Wave

Non-Discrimination - Your Rights Under Title VI of the Civil Rights Act of 1964

The United States Department of Transportation (DOT) ensures full compliance with Title VI of the Civil Rights Act of 1964 by prohibiting discrimination against any person on the basis of race, color or national origin in the provisions of benefits and services resulting from federally assisted programs and activities. Any person, who believes The Wave Transit System (WTS) has violated his/her Title VI protections, should contact the WTS at 251.344.6600. The Wave has also developed a policy to assist individuals who are Limited English Proficient (LEP). Translation services in order to assist LEP individuals shall be made available to WTS's customers upon request. WTS's Title VI policy, complaint procedures and LEP Plan shall be made available upon request by contacting The Wave Transit at the above-noted information. For federal Title VI information please contact the Federal Transit Administration (FTA), Region VI at 404.865.5600. Federal Title VI information, including filing complaints, can also be accessed on the FTA web site at: www.fta.dot.gov.

251-344-6600

www.thewavetransit.com

NEW SUBMISSIONS

CHART 1

Dept. Job Title or Number	Current Period As Of: June 2014																		Current				Availability %				% of Under-Utilization				GOAL							
	EMPLOYEES									EMPLOYEES									M		F		MIN		F		MIN		F		MIN		F		MIN		F	
	MALE			FEMALE			MULTI			MULTI			M		F		MIN		F		MIN		F		MIN		F		MIN		F							
	TOT	M	F	W	AA	HISP	API	AIAN	NHOP	MULT	W	AA	HISP	API	AIAN	NHOPI	MULTI	#	%	#	%	MIN	F	MIN	F	MIN	F	MIN	F	MIN	F							
Officials and Managers	9	4	5	1	3	0	0	0	0	1	4	0	0	0	0	0	7	77.28%	5	55.6%	0.0%	0.0%	77.28%	55.6%	(7.00)	(5.00)												
Professionals	1	1	0	1	0	1	0	0	0	0	0	0	0	0	0	0	1	100.0%	0	0.0%	0.0%	0.0%	100.0%	0.0%	(1.00)	0.00												
Technicians	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0%	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00	0.00											
Sales Workers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0%	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.00	0.00												
Administrative Support Workers	15	9	6	0	4	0	0	0	0	0	11	0	0	0	0	0	25	100.0%	11	73.3%	0.0%	0.0%	100.0%	73.3%	(15.00)	(11.00)												
Craft Workers	11	11	0	4	7	0	0	0	0	0	0	0	0	0	0	0	7	63.6%	0	0.0%	0.0%	0.0%	63.6%	0.0%	(7.00)	0.00												
Operatives	89	48	41	2	43	0	0	0	0	2	42	0	0	0	0	0	89	95.3%	44	49.4%	0.0%	0.0%	95.3%	49.4%	(16.00)	(4.00)												
Laborers	8	8	2	0	6	0	0	0	0	0	2	0	0	0	0	0	8	100.0%	2	25.0%	0.0%	0.0%	100.0%	25.0%	(8.00)	(2.00)												
Service Workers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.0%	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.00	0.00												

AA - African American
 HISP - Hispanic
 API - Asian Pacific Islander
 AIAN - American Indian or Alaska Native
 NHOP - Native Hawaiian or Other Pacific Islander
 Multi - Two or More Races