

Recipient Name: Gainesville, FL  
 TRAMS ID:1084  
 Date EEO Program Was Reviewed: 03/09/2020  
 Review Conducted By: S. Majdiak

2.2 EEO PROGRAM ELEMENTS

	STATEMENT OF POLICY–C. 4704.1A 2.2.1	Yes	No	Review Comments
1	Is there a written Statement of Policy by the CEO/GM	x		Please see comments below and update your EEO Policy to include pregnancy), genetic information, veteran status. Additionally, your Policy must forbid retaliation for engaging in protected EEO activity. <a href="#">See below.</a>
<b>Does the statement:</b>				
2	Express the agency’s commitment that all employment actions will be administered without regard to race, color, religion, national origin, sex (including gender identity, sexual orientation, and pregnancy), age, genetic information, disability, veteran status, or other protected class		x	Please get your Agency policy reapproved with the correct Basis’s. You have included a City Council approval that identifies the Race Color, National Origin. EEO (Title VII) covers the following additional Basis’s: sex (including gender identity, sexual orientation and pregnancy), genetic information, veteran status. <a href="#">Policy dated April 7, Report p.63</a>
3	Commit to develop a written nondiscrimination program and make the EEO Program available for inspection	x		
4	Explain that the responsibility for implementing the EEO Program is assigned to an agency executive who reports directly to the CEO/GM	x		
5	State that applicants and employees have the right to file complaints alleging discrimination with the EEO Officer or	x		
6	State that retaliation against an individual who engages in protected activity is strictly prohibited and will not be tolerated	x		

7	State the agency's commitment to provide reasonable accommodations to applicants and employees who need them because of a disability or to practice or observe their religion		x	I was not able to locate your Policy on reasonable accommodations to applicants and employees who need them because of a disability or to practice or observe their religion. <a href="#">Policy Number EO-6, p. 52</a>
8	State that all management and supervisory personnel share in this responsibility and are assigned specific tasks to ensure and achieve compliance	x		
9	State that the agency evaluates the performance of supervisors based on the success of the EEO Program	x		
10	Provide the name and contact information for the EEO Officer	x		
11	Provide the Signature and Date of GM or CEO	x		
<b>DISSEMINATION—C. 4704.1A 2.2.2</b>		<b>Yes</b>	<b>No</b>	<b>Review Comments</b>
<b>Does the dissemination section include:</b>				
12	Providing written communications from the CEO/GM (i.e., policy statement)	x		
13	Posting official EEO materials in various locations around the agency	x		
14	Including the EEO policy statement in the agency's personnel and operations manual, employee handbooks, reports and manuals	x		
15	Meeting with top management officials at a minimum semiannually to discuss the EEO Program and its implementation	x		
16	Meeting with all employees and affinity groups to seek input on the program implementation	x		
17	Conducting periodic EEO training for all employees and for managers	x		
18	Conducting EEO training for all new supervisors or managers within 90 days of their appointment		x	I was not able to locate if you have a policy to conduct EEO training for all new supervisors or managers within 90 days of their appointment. I saw a general statement about training new employees. <a href="#">Policy Number EO-7, Page 65, Policy/Goal G.</a>
<b>Externally, does the agency state:</b>				
19	When there is outreach or advertising to recruitment entities the agency will disseminate their policy to those entities	x		
20	All recruitment ads must state that the agency "is an equal employment opportunity employer"	x		
<b>DESIGNATION OF PERSONNEL—C. 4704.1A 2.2.3</b>		<b>Yes</b>	<b>No</b>	<b>Review Comments</b>
<b>Do the EEO program office responsibilities include:</b>		x		
21	Developing the EEO policy statement and a written EEO Program	x		
22	Assisting management in collecting and analyzing employment data, identifying problem areas, setting goals and time tables, and developing programs to achieve goals	x		

23	Designing, implementing, and monitoring audit and reporting systems to measure program effectiveness and to determine where progress has been made and where proactive action is needed	X		
24	Reviewing the agency's nondiscrimination plan with all managers and supervisors to ensure that the policy is understood	X		
25	Concurring in the hiring and promotion process	X		
26	With human resources, periodically reviewing employment, complaint, and reasonable accommodation policies; performance evaluations; grievance procedures; and union agreements	X		
28	Reporting at least semiannually to the CEO/GM on progress towards agency goals and on contractor and vendor compliance	X		
29	Serving as liaison between the agency and government and community stakeholders	X		While you cited this as part of the job duties there was no actual information about what activities are actually taking place. Please include this sort of detail in your next report.
30	Maintaining awareness of current EEO laws, and ensuring the laws affecting nondiscrimination are disseminated to responsible officials	X		
31	Investigating complaints of EEO discrimination	X		
32	Providing EEO training for employees and managers	X		
33	With human resources, advising employees and applicants of available training programs and professional development opportunities	X		
34	Auditing postings of the EEO policy statement to ensure compliance information is posted and up to date	X		
	<b>Do the agency officials, supervisors and managers' responsibilities include:</b>			
35	Participating in periodic audits of all aspects of employment to identify and to remove barriers obstructing the achievement of specified goals and objectives	X		
36	Holding regular discussions with other supervisors, employees, and affinity groups to ensure agency policies and procedures are being followed	X		
37	With the EEO Officer, maintaining and updating the personnel database for generating reports required for the nondiscrimination program	X		
38	Cooperating with the EEO Officer in review of information and investigation of complaints	X		
39	Encouraging employee participation to support the advancement of the EEO Program (e.g., professional development and career growth opportunities, posting promotional opportunities, shadowing, mentoring)	X		
	<b>UTILIZATION ANALYSIS—C. 4704.1A 2.2.4</b>	<b>Yes</b>	<b>No</b>	<b>Reviewer Comments</b>
40	Does the work force analysis include a statistical breakdown of the recipients' workforce by each EEO-4 job category?		X	Please see comments below at end of form.* <a href="#">Section 4, Pp 8-12</a>

41	Does the recipient break down its workforce by sex and racial group in each EEO-4 category?		X	Pp.8-12
42	Does the recipient provide an availability percentage for each sex and racial group in the EEO-4 job categories?		X	p. 14
43	Does the recipient identify and explain the geography used to determine their availability percentage?	X		
44	Does the recipient clearly identify underutilized sex and racial groups for each EEO-4 job category?		X	Pp 14
<b>GOALS AND TIMETABLES—C. 4704.1A 2.2.5</b>		<b>Yes</b>	<b>No</b>	<b>Reviewer Comments</b>
45	Does the recipient establish percentage goals to correct for each underutilized sex and racial group?		X	Per comments related to Q40-44 please update your goals based on each the utilization charts and then address them specifically in your narrative in any areas of underutilization. Do not only report Minority's in aggregate. Past and current goals should be specific. Pp.16; and Pp.67-70
46	Does the recipient explain and provide a justification for prior goals that they did not meet?		X	I was not able to locate this in your Report. In your future submissions if it is not applicable pleas provide a simple statement to that effect. Ok
<b>EMPLOYMENT PRACTICES—C. 4704.1A 2.2.6</b>		<b>Yes</b>	<b>No</b>	<b>Reviewer Comments</b>
47	Is there a <b>detailed</b> narrative assessment of current employment practices (e.g., hiring, recruitment, and training)?	X		The <b>narrative</b> assessment of current employment practices (e.g., hiring, recruitment, and training) you provided in your submission lacked detail. You state which job categories minorities either are or are not underrepresented in your narrative but do not address each specific minority group but discuss in aggregate. In your recruiting you again need to address any specific minorities groups that are underrepresented (if any). Your narrative, goals and recruitment plan should all be specific in addressing this. Please update your submission to address this. <a href="#">Section 5</a>
48	Do the analyses contain statistical data over the program period to document the impact of the employment practices by sex and race?		X	Yes, Pp 20-25
49	Does the recipient provide an explanation of the steps it will take to address any potential adverse impacts in the sex and racial groups?		X	Please see above #47. <a href="#">Section 5</a>
<b>Does the statistical analysis contain:</b>				

50	The number of applicants for employment in each job category and the number hired, cross-referenced by sex and race		x	Please update this data or in any case were that material is not available address it in your narrative. Pp. 20-25
51	The number of employees in each job category who applied for promotion or transfer and the number in each job category promoted or transferred, cross-referenced by sex and race		x	Section 5.2.2, Pp 28-33
52	The number and types of disciplinary actions (e.g., indefinite suspension, loss of pay, demotion), tailored to the language used in union contracts and agency policies and procedures		x	Please use the FTA provide employment practice chart and provide the data for Q52-55. Section 5.4 (Pp. 34-35
53	The number of voluntary/involuntary terminations, cross-referenced by sex and race		x	Table 5.1.10
54	Job category training that fosters promotion potential, cross-referenced by sex and race		x	Service workers receive post hire training; promotion-related training is limited for other job classes.
55	Individuals with Disabilities and Veterans, the number of applicants for employment and promotions in each job category and the number hired and promoted, cross-referenced by sex and race		x	Pp. 31-33. City job application does not ask disability questions of applicants.
<b>MONITORING AND REPORTING SYSTEMS—C. 4704.1A 2.2.7</b>		<b>Yes</b>	<b>No</b>	<b>Reviewer Comments</b>
<b>Is there a monitoring system that describes:</b>				
56	Methods to monitor the EEO components identified in this chapter (e.g., dissemination, utilization analysis, statistical employment practices, timeframe to reach goals, all identified barriers and the progress of the action plan)	x		
57	Procedures used to determine EEO compliance of subrecipients and contractors such as collection and review of their EEO Programs, visits to facilities to ensure proper posting of the EEO Policy Statement, etc.	x		
58	Procedures for reviewing union contracts, in conjunction with human resources, to ensure there is not a disparate impact	x		
59	Process for monitoring complaints (e.g., describe the tracking system, monitoring of trends, timeliness of investigations, resolutions, reporting to management)		x	You reference the EEO Officer being responsible for this but I was not able to locate your actual timeframes. You include general language about tracking Complaints and the formal complaint process but do not provide specifics. Please update your Report to address this. Section 5.4.1 Tracking Complaints
<b>Is there a reporting system that describes:</b>				
60	Meetings held between the CEO/GM and the EEO Officer to discuss the progress of the EEO Program and the results of the monitoring (including but not limited to, hiring, promotions, status of EEO complaints)	x		
61	All program EEO-related meetings held between the EEO Officer and management, including topics covered, follow-up actions	x		

62	EEO Officer's meetings with human resources and hiring officials to review current EEO goals and statistics on employment practices and policies (e.g., verifying that job descriptions contain legitimate position requirements and that all testing has been validated)	X		
<b>REQUIRED EEO PROGRAM ATTACHMENTS</b>		<b>Yes</b>	<b>No</b>	<b>Reviewer Comments</b>
63	List of subrecipients and contractors who are being monitored and the services they provide		X	For future submissions please address all reporting elements in the FTA 4704.1A Circular and the EEO checklist. Please create your Table of Contents using the checklist and identify the exact Pg. location of all reporting requirements. Your Report should mirror the chronologically order of the Circular If any reporting elements do not apply to you for example not having subrecipients identify that in a simple statement for any category in the checklist that it applies to.
64	Proof of review of subrecipients and contractors' EEO Program (e.g., letter or memo to the subrecipient)		X	Please see above. <a href="#">Noted</a>
65	Organization chart showing the reporting relationships of all directors, department heads, and executive leadership (include names and titles)	X		
66	A copy of the goals and timetables from the previous program submission		X	<a href="#">Appendix E, Goals and Timetables (2016), Pp. 67-70</a>

#### Q 40-44 UTILIZATION ANALYSIS–C. 4704.1A 2.2.4

I was not able to locate your work force analysis include a statistical break. You have down of the recipients' workforce by each EEO-4 job category. You have provided charts that provide an aggregate of minorities but not specific data on each minority group by gender and job category. Please sue the FTA provided charts to ensure you do not miss reporting requirements and resubmit your Report. [Amended report has responded to and addressed this comment. Please see report pages for responses to Q 40-44.](#)