



City of Davenport / CitiBus Equal Employment Opportunity (EEO)

Policy Statement

The City of Davenport and CitiBus have a strong commitment to the community we serve and 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, creed, sex, national origin or ancestry, marital status, familial status, age, physical or mental disability, political affiliation, veteran status, gender identity, or sexual orientation.

The CitiBus 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.

CitiBus 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.

CitiBus is a division of the Department of Public Works in Davenport. It is the responsibility of the CitiBus's Transit Director, under direction from the Department of Human Resources, to ensure that CitiBus complies with the City's EEO Policy and Program.

To ensure program preparation, monitoring, and complaint investigation, the Talent & Inclusion Administrator, Mr. Scott J. VanDeWoestyne (scott.vandewoestyne@davenportiowa.com) or (563) 326-6188 serves as the City's EEO Officer. On EEO related matters, Mr. VanDeWoestyne reports directly to the City Administrator. The City Administrator reports directly to the City of Davenport City Council.

All City of Davenport executives, management, and supervisory personnel, however, share in the responsibility for implementing and monitoring the City's EEO Policy and Program within their respective areas.

CitiBus is 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 the City of Davenport's EEO Policy and Program. Furthering our commitment to transparency and inclusion, this program is available for inspection by anyone. Interested individuals can contact the EEO Officer listed above, or the document is viewable on our city website.

Policy Dissemination

CitiBus employees have traditionally been covered under the general City of Davenport EEO Policy. Additionally, the number of CitiBus employees typically is less than 50 which permitted CitiBus to be part of the City of Davenport EEO program.

In December, 2017, CitiBus expanded service, temporarily, to provide congestion mitigation during the construction of a new I-74 Bridge. This resulted in the number of CitiBus employees exceeding 50 which, as required by the Federal Transit Administration (FTA), requires the City of Davenport to meet the "Abbreviated EEO Program Requirements as detailed in the FTA Circular 4704.1A (<http://www.fta.dot.gov/documents/FTAEEOProgramGuidelines.pdf>).

As a result, a separate EEO Policy specifically for CitiBus employees to meet the FTA requirements was developed. This new CitiBus EEO policy will be distributed throughout CitiBus's organization after the FTA formally approves this plan.

Internal Dissemination

The CitiBus EEO Policy has been disseminated internally at CitiBus in the following manner:

- Written communications to all transit employees from the Transit Director regarding the EEO program (i.e. EEO policy changes).
- EEO Posters (federal and state labor law posters) and CitiBus's EEO Policy, which is signed by the City Administrator, is posted on the bulletin board near at the CitiBus office and at the Ground Transportation Center.
- The CitiBus EEO policy is included in the current Driver's Manual.
- Safety meetings are held with CitiBus staff quarterly and any changes within the policy are discussed. All CitiBus employees at every level of the organization (drivers, maintenance, dispatchers, and administrative staff) are required to attend these safety meetings and a sign-in sheet is kept documenting attendance.
- CitiBus senior management/supervisors have periodic meetings to discuss staffing of the organization and any ongoing recruitment. Further, CitiBus management will schedule bi-annual meetings with the City Administrator and EEO Officer to inform and discuss the progress of the EEO Program, and opportunities for improvement.
- CitiBus presents and discusses the EEO Program with all new hires, including managers, as part of their employee orientation conducted during CitiBus's training process. New

employees are also presented with the EEO Program during the orientation session with the Department of Human Resources.

- All new hires are provided information on how to contact the EEO Officer and where to file an EEO complaint.
- Effective immediately, all new CitiBus employees will sign an “EEO Employment Acknowledgement of Training” form that acknowledges receipt of a written copy of CitiBus’s EEO Policy which is included in the Appendix.
- CitiBus conducts EEO training for all “new” supervisors or managers within 90 days of their appointment and periodic EEO training for employees/managers as needed.

External Dissemination

Externally, CitiBus disseminates our EEO information (policy, contact person, etc.) to regular recruitment sources as follows:

- CitiBus website – https://cityofdavenportiowa.com/services/citibus_transit
- City of Davenport Human Resources office where applicants may fill out applications through NeoGov software.
- CitiBus job descriptions.
- All CitiBus transit vehicles.
- All external advertisements for personnel within public media sources (newspapers, magazines, journals, etc.) or employment materials dispersed to organizations (employment agencies, minority/woman organizations, etc.) will include a statement that “CitiBus, a department of the City of Davenport, is an EEO employer.”

Designation of Personnel Responsibility

Transit Operations Manager Overall Responsibility

The Transit Operations Manager’s job description includes the following statement:

“The Transit Operations Manager is responsible for ensuring EEO Program requirements within the transit agency are implemented in compliance with the provisions of Section 19 of the Urban Mass Transportation Act of 1964, as amended, as they relate to all Federal Transit Administration programs.”

The job description is also included in the Appendix.

EEO Officer Responsibility

The EEO Officer, Mr. Scott J. VanDeWoestyne, has the responsibility for EEO and AA programs at CitiBus. On EEO related matters, Mr. VanDeWoestyne reports directly to the City Administrator who, in turn, reports directly to the City of Davenport City Council.

Mr. VanDeWoestyne is the Talent & Inclusion Administrator and has been employed by the City since May 2016.

The EEO Officer's main responsibilities include, but are not limited to:

- Investigate employment practices or alleged violations of laws to document and correct discriminatory factors. Evaluate personnel practices to ensure adherence to regulations.
- Prepare reports related to investigations of equal opportunity complaints. Prepare research reports.
- Interview persons involved in equal opportunity complaints to verify case information. Interview witnesses, suspects, or claimants.
- Study equal opportunity complaints to clarify issues. Evaluate personnel practices to ensure adherence to regulations.
- Meet with persons involved in equal opportunity complaints to arbitrate and settle disputes. Interview witnesses, suspects, or claimants. Negotiate agreements to resolve disputes.
- Develop guidelines for nondiscriminatory employment practices. Establish organizational guidelines or policies.
- Monitor the implementation and impact of guidelines for nondiscriminatory employment practices. Evaluate personnel practices to ensure adherence to regulations.
- Coordinate, monitor, or revise complaint procedures to ensure timely processing and review of complaints. Monitor organizational processes.
- Provide information, technical assistance, or training to supervisors, managers, or employees on topics such as employee supervision, hiring, grievance procedures, or staff development. Train personnel on managerial topics.
- Participate in the recruitment of employees through job fairs, career days, or advertising plans. Coordinate personnel recruitment activities in conjunction with the Affirmative Action Advisory Commission, a volunteer Commission of the City of Davenport.
- Assist management in collecting and analyzing employment data and statistics as they relate to employment practices.
- Concurs on all hiring and promotional processes set forth by CitiBus.
- Collaborates with City of Davenport – Human Resources staff on the periodic review of employment policies (e.g. hiring, promotions, training), complaint policies, reasonable accommodation policies, performance evaluations, grievance procedures, and union agreements.

- Reports relevant materials to the City Administrator on vendor and contractor compliance at a minimum semiannually.
- Maintains awareness of current EEO laws and regulations, and ensures the laws and regulations affecting non-discrimination are disseminated to responsible officials.
- In collaboration with Human Resources, advises employees and applicants of available training programs and professional development leadership opportunities.
- Audits postings of EEO policy statement to ensure compliance information is posted and relevant.

Mr. VanDeWoestyne is identified by name in all internal and external communications regarding the EEO program.

CitiBus Manager/Supervisor Responsibility

The successful management/supervision of CitiBus includes the following collaborative responsibilities assigned to those in supervisory roles in coordination with the EEO Officer: Assists the EEO Officer in implementing a successful Equal Employment Opportunity (EEO) program that meets Federal Transit Administration regulations and must not discriminate based on a protected class. Actively participates in periodic audits of all aspects of employment in order to identify and to remove barriers obstructing achievement of specified goals and objectives; holds regular discussions with other managers, supervisors and employees and affinity groups to assure the agency's policies and procedures are being followed. In conjunction with the EEO Officer, maintaining and updating the personnel database for generating reports required for the nondiscrimination program. Cooperates with the EEO Officer in review of information and investigation of complaints. Encourages employee participation to support the advancement of the EEO Program (e.g. professional development and career growth opportunities, posting promotional opportunities, shadowing, mentoring).

Assessment of Employment Practices

Recruitment and Selection Procedures

All Applicants –As CitiBus is an agency of the City of Davenport, it follows the City’s recruitment policy which is intended to ensure the appointment of competent individuals to positions based on merit; that is, solely on the basis of job-related qualifications. All applicants for any CitiBus position apply through the City of Davenport Human Resources (HR) Department on an electronic program called “NeoGov”. The application form links and position description are attached within NeoGov as well as advertised on CitiBus’s website “Job Page”.

For applicants that do not have access to a computer, they may enter their application information at the City of Davenport HR Department on a computer available to the public, at the Public Works facility, or at any of the three public libraries. To remove any barriers from the hiring process, the City of Davenport HR Department staff is available to assist applicants in completing the application online.

All applicants are interviewed prior to employment. A list of specific questions is developed for all recruitments in coordination with the City of Davenport Human Resources Department. The questions are job specific and are identical for each candidate interviewed.

Once the interview is completed, the CitiBus Operations Manager requests a background check and, following approval from the City of Davenport Department of Human Resources, a medical check. As part of the medical exam, the applicant must pass a functionality test developed through partnership with Genesis Health System.

All new CitiBus drivers must begin as part-time drivers. Access to full-time positions requires completion of the Civil Service test which is open to employees and non-employees and is offered annually.

Through an agreement between the City of Davenport, CitiBus, and the Amalgamated Transit Union, part-time drivers who have passed the Civil Service test have first opportunity for open positions based on seniority and quality of service. The agreement is included in the appendix.

Dispatchers are secured through a contract with First Transit and fall under both the First Transit EEO program and this City of Davenport/CitiBus EEO Program.

Mechanics report to the Fleet Manager and fall under this City of Davenport/CitiBus EEO Program.

Wages, Salaries and Other Forms of Compensation

CitiBus employees are employees of the City of Davenport covered through a contract with the Amalgamated Transit Union (ATU). Wage, salaries and other forms of compensation are specified in the agreement between the City of Davenport and the ATU.

Disciplinary Procedures, Discharge and Termination Practices

CitiBus employees are employees of the City of Davenport and are subject to disciplinary procedures, discharge, and termination policies and practices of all City of Davenport employees. Attached to this plan is a copy of Chapters 13 (Grievance), 14 (Discipline) and 15 (Separation) of the City's Personnel Policies regarding these practices.

In addition, CitiBus has specific disciplinary actions and policies that are highlighted within CitiBus's Driver Manual as attached within the appendix.

Employment Practices Impact

Hiring – The information below is a summarization of the hiring statistics for CitiBus recruitments. As CitiBus employees are City of Davenport employees, CitiBus relies upon the City’s Human Resources Department for statistics for this plan from their NeoGov database. Between January 1, 2018 and December 31, 2019, CitiBus received 249 applications for employment.

Hiring statistics are as follows:

- 57% of the applicants were male, 43% female.
- 49% were Caucasian, 41% African American, 6% Hispanic, 2% American Indian.
- At this moment, CitiBus staff is 60% male and 40% female. Racial/Ethnic breakdown is 56% Caucasian, 31% African American, and 13% Hispanic.
- Under the Service-Maintenance job category, CitiBus had 249 applications for transit operator during the time frame specified above. CitiBus tracks the recruitments and at what point candidates withdraw from the process, fail to show for required testing and/or interviews, or fail a background check. CitiBus hires the most qualified candidates that pass the required steps in the hiring process and that commit to fulfilling the responsibilities of being a transit operator for CitiBus.
- The City of Davenport does not track veteran status of employees.
- CitiBus does not have any employees who are disabled.

After analyzing this data, CitiBus has determined that its hiring practices have not had a disparate impact on women and minorities within the organization; however, it will continue its work to recruit qualified women and minority applicants in collaboration with the City of Davenport Human Resources Department.

Promotions/Transfers – The information below is a summarization of the promotions/transfers statistics for CitiBus for the time period of January 1, 2018 – December 31, 2019.

Statistics are as follows:

- CitiBus did not have any promotional opportunities within this time period.

After analyzing this data, CitiBus has determined that its promotions/transfers have not had a disparate impact on women and minorities within the organization; however, it will continue its work to strengthen minority and female driver’s skills and development.

Terminations & Disciplinary Actions – The information below is a summarization of terminations and disciplinary actions that occurred during the time period of January 1, 2018 – December 31, 2019.

Statistics are as follows:

- During the time period above, CitiBus suspended eight employees. Males represented 75% of these; 25% were female. Caucasians represented 75%; African-Americans 13%.
- During the time period above, CitiBus terminated four employees. Males represented 25% of these, 75% were female. Caucasians represented 50%; African-Americans 50%.

After analyzing this data, CitiBus has determined that its disciplinary actions have not had a disparate impact on women and minorities within the organization. Actions taken are reflective of the current overall number of women and minorities in its employment.

Training – The information below is a summarization of training offered all CitiBus employees during the time period of January 1, 2018 – December 31, 2019. All training is entered into an internal database named Salamander.

Here is a list of trainings provided to CitiBus staff:

Bias, Inclusion, Harassment, and Bullying

Respectful Workplace

Supervisors Training (included First Report of Injury/Managing Work Comp/Reasonable Suspicion/FMLA)

Substance abuse

Fatigue

Injury Prevention

Basics of Safety

Customer Relations

Customers with Disabilities

Loading and Unloading Customers

Difficult Customers

Collisions

BTW Training and route training

After analyzing this data, the EEO Officer has determined that training is provided equitably for all personnel.

Monitoring and Reporting System

An important part of any successful EEO program is the establishment of an effective and workable internal monitoring and reporting system. Furthermore, CitiBus conducts the following monitoring and reporting activities:

Assessing EEO accomplishments

Recruiting - CitiBus actively seeks minorities, females and members of other protected groups for employment. In order to improve recruitment and increase the flow of minority and female

applicants at CitiBus, the City of Davenport Human Resources regularly contacts local minority and female organizations and local, state and federal employment agencies. The City of Davenport informs these recruiting sources of CitiBus's EEO Policy through distribution of Job Opportunity Announcements, which states CitiBus is an Equal Opportunity Employer, as a department of the City of Davenport. The City also has a volunteer led commission appointed by the Mayor and City Council, named the Affirmative Action Advisory Commission.

Employment and Selection - The minority/gender of applicants and new hires will be reviewed periodically to assure that sufficient numbers are applying for jobs and to assure that the selection process is not adversely impacting CitiBus's ability to meet its EEO program goals.

Non-Discrimination Training - All employees engaged in rendering hiring and promotion decisions will be trained to assure nondiscrimination in decision-making. The hiring and promotion results shall be reviewed periodically to verify nondiscrimination practices by race and gender.

Screening Mechanisms - All screening mechanisms used will be for purposes of determining an individual's suitability for the particular job sought or to meet other lawful purposes. CitiBus shall not use any non-job-related screening mechanism that has an adverse impact on minorities, females and members of other protected groups.

Application Forms - CitiBus's employment application form shall contain a notice that CitiBus is an Equal Opportunity Employer as a department of the City of Davenport.

EEO Minority Status - Information, which is collected for EEO purposes only, regarding applicants who have protected group membership, will be maintained in a file separate from applications.

Review of EEO Goals - Management personnel that hire for positions will review EEO goals at the time of recruitment especially in areas of underutilization. For areas of underutilization, additional efforts to promote the recruitment to women/minorities must be made and documented to the EEO Officer. Additionally, applications of female/minority employees shall be reviewed again by the managers to assure that all qualified individuals are given equal consideration and opportunities for upgrades, promotions and transfers. If females/minorities are ruled out from the interview process, the step at which they are ruled out is documented and shared with the EEO Officer. Reasons for not meeting the required steps are documented anywhere along the application process including the following: application received, score supplemental questions, telephone interview, Oral Board. Additionally, if an applicant is not qualified, doesn't show to take an exam, or bows out of the process, this is recorded as well. All reasons for not meeting the required steps for employment are documented and this information provided to the EEO Officer.

Community Action - It is imperative that a good working relationship exists between CitiBus and the community in order to inform the minority, female and disabled persons of the employment opportunities at CitiBus. Positive relationships result in creating mutual respect and

cooperation. As an agency of the City of Davenport, CitiBus not only recruits employees through the Human Resources Department, but also through collaboration with the Affirmative Action Advisory Commission, and local university job boards.

Performance Evaluations – All performance evaluations of CitiBus management will include discussions on each employee’s commitment to equal employment opportunities. The appraisal of equal employment opportunity efforts and results will be used to evaluate whether a manager’s job performance is acceptable.

Exit Interviews – CitiBus conducts exit interviews to all CitiBus employees which allow opportunity for comments from employees about the organization and their position with CitiBus. If any written comments reveal EEO issues or discuss patterns of practice within CitiBus’s policies, those issues would be forwarded to the EEO Officer for review.

Enable CitiBus to evaluate the EEO program during the year and to take necessary corrective actions

EEO Issues – CitiBus management staff will inform each other and the EEO Officer of any EEO-related problems that arise in their respective areas so that immediate and appropriate steps can be taken to resolve any issues. The primary line of communication with CitiBus management will be direct face to face interaction regarding these issues and within division (management) meetings that occur at least monthly.

Policy Changes or Policy Complaints - The EEO officer reviews any new policy changes or complaints with current policies to determine if there are any nondiscriminatory policies being carried out within the organization. Any new policies would be discussed within management’s division meetings that occur at least monthly throughout the year.

Division Meetings – CitiBus’s senior staff meets at least monthly within division staff meetings to informally discuss any on-going workforce changes (hiring, transferring, promotions). Discussions of any disciplinary actions are made as well impacting the workforce as all shifts/runs need to be covered operationally. During these meetings, opportunity is given to discuss and/or remind managers of EEO goals if hiring is being conducted for positions with underutilization. Further, CitiBus management will schedule bi-annual meetings with the City Administrator and EEO Officer to inform and discuss the progress of the EEO Program, and opportunities for improvement. All meeting agendas, notes, and documents will be under the authority of the EEO Officer and secured on a secure network. The EEO Officer will inform Human Resources staff on a regular and as needed basis on the review of current EEO goals and statistics on employment practices and policies.

EEO Workforce Analysis - Data will be reported semi-annually to the management team to review if additional actions are necessary to meet the goals. Through this report and subsequent meeting, if goals are not being met, management and the EEO Officer will develop specific

actions with managers that are needed to attempt to meet these goals. Additional actions may include evaluating the hiring pool provided by the City of Davenport. Progress on the CitiBus EEO Program will be discussed at division meetings, and relevant information will be communicated to employees during meetings as appropriate.

Hires/Applicants Monitoring/Reporting- CitiBus tracks how many applicants and hires occurred within the organization by job category by race and gender. This information is analyzed on a bi-annual basis, or more frequently if requested. Applicants by job classification, gender and race are provided by the City of Davenport Human Resources department via the NeoGov application software and MUNIS software.

Promotions/Applicants Monitoring/Reporting - CitiBus tracks how many applicants and promotions occurred within the organization by job category by race and gender via the NeoGov application software and MUNIS software. This information is analyzed on a bi-annual basis, or more frequently if requested.

Employment Terminations Monitoring/Reporting - CitiBus tracks all terminations from employment, including resignations, retirement, retirement in lieu of termination, termination, disability retirement, reduction in workforce, transfer to other city departments and death by race and gender within our internal MUNIS system.

Discipline Action Monitoring/Reporting - CitiBus staff tracks all disciplinary actions including terminations, suspensions, length of suspensions, written warnings and verbal warnings by race and gender within our internal MUNIS system as they occur. This information is analyzed during the EEO Program analysis.

Tracking EEO Complaints

It is the objective of CitiBus to resolve issues of discrimination and/or disparate treatment and/or harassment of members of protected groups on an informal basis by involving the immediate supervisor and/or department manager. CitiBus management is responsible for mediating complaints of discrimination at the early stages by counseling employees in matters of discrimination in employment, disparate treatment, adverse impact, sexual harassment, etc., and by advising or assisting management in the complaint resolution process before a formal grievance is filed by an employee. If resolution cannot be found, than a formal EEO Complaint may be filed. The complaint is submitted to the EEO Officer where the complaint is logged and tracked.

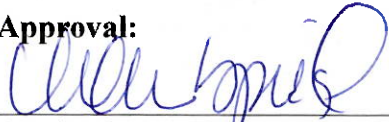
Procedures for Monitoring Subcontractors

CitiBus will assure EEO compliance of any subcontractors/sub recipients by having them provide to us their EEO programs. They will do so either electronically or via paper copies. If feasible, visits to their facilities will occur to ensure proper posting of the EEO Policy Statement. As of January 2020, our only current sub recipient is First Transit. We received and reviewed their EEO policy via email on February 14, 2020.

Procedures for Reviewing Union Contracts

CitiBus and Human Resources will review as necessary, but no less than bi-annually, any union contracts that are active to ensure there is not a disparate impact on our employment efforts.

Approval:



Corri Spiegel, City Administrator

2/24/2020

Date