

EQUAL EMPLOYMENT OPPORTUNITY POLICY AND PROGRAM

For

Star Transit



Revised May 2019

TABLE OF CONTENTS

Revised May 2019 1

I. STATEMENT OF POLICY 3

II. DISSEMINATION..... 5

III. DESIGNATION OF RESPONSIBILITY 6

IV. UTILIZATION ANALYSIS 8

V. GOALS AND TIMETABLES 9

VI. ASSESSMENT OF EMPLOYMENT PRACTICES 9

VII. MONITORING AND REPORTING 9

VIII. EEO COMPLAINT PROCESS..... 10

I. STATEMENT OF POLICY

Star Transit has 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, national origin, sex (including gender identity, sexual orientation, and pregnancy), age, genetic information, disability, veteran status, or other protected class.

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

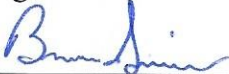
All applicants and employees have the right to file complaints alleging discrimination. Retaliation against an individual who files a charge or complaint of discrimination, participates in an employment discrimination proceeding (such as an investigation or lawsuit), or otherwise engages in protected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

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

As Star Transit's Transit Manager, I maintain overall responsibility and accountability for Star Transit's compliance with its EEO policy and plan. All executives, management, and supervisory personnel, however, share in the responsibility for implementing and monitoring Star Transit's EEO policy and plan within their respective areas and will be assigned specific tasks to ensure compliance is achieved. Star Transit will evaluate its managers' and supervisors' performance on their successful implementation of Star Transit's policies and procedures, in the same way Star Transit assesses their performance regarding other agency's goals.

Star Transit is committed to undertaking and developing a written nondiscrimination program that sets forth the policies, practices and procedures, with goals and timetables, to which the agency is committed and makes the EEO policy and plan available for inspection by any employee or applicant for employment upon request.

I am personally committed to a workplace that acts upon its daily responsibility to treat all applicants and employees with dignity and respect, as well as equitably under the guidelines of our EEO policy and plan.

Signed: 
CEO

Date: 5/31/2019

Guiding Legislation:

- Equal Pay Act of 1963, 29 U.S.C. 201
- Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d
- Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e
- Age Discrimination in Employment Act of 1967, 29 U.S.C. 633a
- Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. 794
- 28 CFR Part 42, Subpart F, "Coordination of Enforcement of Nondiscrimination in Federally Assisted Programs"
- 29 CFR Part 1605, "Guidelines on Discrimination Because of Religion"
- 29 CFR Part 1606, "Guidelines on Discrimination Because of National Origin"
- 29 CFR Part 1607, "Uniform Guidelines on Employee Selection Procedures"
- 29 CFR Part 1620, "The Equal Pay Act"
- 29 CFR Part 1625, "Age Discrimination in Employment Act"
- 49 CFR Part 21, "Nondiscrimination in Federally Assisted Programs of the Department of Transportation-Effectuation of Title VI of the Civil Rights Act of 1964"
- 49 CFR Part 27, "Nondiscrimination on the Basis of Handicap in Financial Assistance Programs"
- Part II, Section 110(a) of the FTA Standard Grant Contract, dated 9-87

II. DISSEMINATION

According to the U.S. Department of Transportation's FTA C 4701.1A circular dated October 31, 2016 and revised April 1, 2017, public transit agencies receiving federal funding assistance in excess of \$1,000,000 in the previous federal fiscal year and employing 50 or more transit-related employees must prepare, implement, and evaluate a formalized EEO Plan (EEOP). Star Transit does not meet these thresholds. Formalized communication mechanisms have been established to publicize and disseminate Star Transit's policies to its employees, applicants, and the general public.

Formalized communication mechanisms are divided into two categories: External dissemination and Internal dissemination.

External Dissemination

The EEO Plan will be disseminated under the guidance of the Star Transit's transit manager. The general guidelines for external dissemination shall be:

- All advertisements for employment will contain the following statement, *Star Transit is an Equal Employment Opportunity Employer*" at the bottom of the advertisement.
- The Equal Employment Opportunity Plan is posted on Star Transit's website as an employee and applicant resource.
- Any employee involved in organizations and/or community groups which have special contacts with minorities and women's groups are encouraged to report to the Chief Executive Officer about the existence of such groups. Star Transit will provide a copy of its EEO policy to these entities.

Internal Dissemination

- All new employees, both supervisory and non-supervisory, will be informed of the EEO policy and plan within 60 days of hire.
- All employees will undergo EEO retraining. This training will be conducted annually.
- The EEO plan, including all policies and procedures, is incorporated into the Personnel Policies.
- The transit manager will conduct a semiannual meeting (December and June) with Senior Staff to discuss the EEO Plan and its implementation.
- Meet with employees and affinity groups to seek input on the plan implementation.
- EEO-related posters will be posted on employee bulletin boards along with a copy of the EEO policy statement.
- The Equal Employment Opportunity Plan (EEOP) is posted on Star Transit's website as an employee and applicant resource.

III. DESIGNATION OF RESPONSIBILITY

The Transit Manager has the overall responsibility for insuring companywide compliance with Star Transit's Equal Employment Opportunity Policy and Program. Star Transit's Operations Supervisor is responsible for the day-to-day monitoring of the program, and for reporting the results of such monitoring efforts directly to the Transit Manager, who serves as the company's Equal Employment Opportunity Officer.

EEO Officer

The EEO Officer will coordinate and administer the day-to-day operation of the EEO Plan. The responsibilities of the EEO Officer include, but are not limited to, the following:

- Developing the EEO policy statement and a written EEO plan.
- Assisting management in collecting and analyzing employment data, identifying problem areas, setting goals and timetables, and developing programs to achieve goals.
- Designing, implementing, and monitoring internal audit and reporting systems to measure program effectiveness and to determine where progress has been made and where proactive action is needed.
- Reviewing the agency's nondiscrimination plan with all managers and supervisors to ensure that the policy is understood.
- Concurring in the hiring and promotion process.
- In conjunction with human resources, periodically reviewing employment practices policies (e.g., hiring, promotions, and training), complaint policies, reasonable accommodation policies, performance evaluations, and grievance procedures.
- Reporting at least semiannually to the Chairman of the Board on progress in relation to the agency's goals and on contractor and vendor compliance.
- Serving as liaison between the agency; Federal, state, county, and local governments; regulatory agencies; and community groups representing minorities, women, and persons with disabilities, and others.
- Maintaining awareness of current EEO laws and regulations, and ensuring the laws and regulations affecting nondiscrimination are disseminated to responsible officials.
- Investigating complaints of EEO discrimination.
- Providing EEO training for employees.
- In conjunction with human resources, advising employees and applicants of available training programs and professional development opportunities and the entrance requirements.
- Auditing postings of the EEO policy statement to ensure compliance information is posted and up to date.

Senior Staff

- Ensuring that hiring, training, promotion, and development opportunities at all levels of his or her area of responsibility are made 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.
- Assisting in identifying problem areas.
- Reviewing qualifications of employees in areas of responsibility to ensure minorities and women are given full opportunity for transfers and promotions.
- Participating in periodic audits to ensure that each agency unit is in compliance.

- Taking action to prevent discriminatory behavior in their areas of responsibility, including, but not limited to, sexual harassment.
- Ensuring that posters and notices are properly displayed in areas of responsibility.
- Ensuring that management and supervisory personnel in their areas of responsibility comply with the spirit and policies of the EEO.
- Reporting any claim of discrimination to the Transit Manager.
- Cooperating with compliance reviews, government funding agencies, government investigation agencies, and/or the Office of Civil Rights and Labor Relations relative to the discharge of their duties.

All Staff

- Cooperating with the EEO Officer in review of information and investigation of complaints.
- Participating actively in periodic audits of all aspects of employment to identify and remove barriers obstructing the achievement of specified goals and objectives.
- Being actively involved with local minority organizations, women's groups, community action organizations, and community service programs designed to promote EEO.
- Encouraging employee participation to support the advancement of the EEO Program (e.g., professional development and career growth opportunities, posting promotional opportunities, shadowing, mentoring).

IV. UTILIZATION ANALYSIS

According to the year 2000 Census Data as prepared by the Virginia Employment Commission, the total population for the The Eastern Shore MSA is 51,205. The Eastern Shore has an unemployment rate of 6.9% as reported by the Virginia Employment Commission's latest reported figures from December 2009.

The labor market (population) in the Eastern Shore area is comprised of 60.7% White, 34.3% Black, 0% Native American, 0% Asian/Pacific Islander, and 0.5% Hispanic. Of the total population, 51.6% are female.

As part of the EEO Program, Star Transit will complete a utilization analysis. The utilization analysis identifies job categories that have an underutilization or concentration of minorities and women in relation to their availability in the relevant labor market. The analysis also helps establish the framework for goals and timetables to correct employment practices that contributed to any identified underutilization or concentration.

EEO Job Categories:

Job Group	Category	Number of Star Transit employees
1	Executive/Senior Level Officials and Managers	0
2	First/Mid Level Officials and Managers	1
3	Professionals	0
4	Technicians	0
5	Sales Workers	0
6	Administrative Support Workers	1
7	Craft Workers	0
8	Operatives	16
9	Laborers and Helpers	0
10	Service Workers	0

The following table shows the breakdown of Star Transit's current workforce as of May 2019:

<u>JOB CATEGORY</u>	<u>SEX</u>	<u>MINORITY</u>	<u>NON-MINORITY</u>	<u>TOTAL</u>
First/Mid Level Managers	Male	0	1	1
	Female	0	0	0
Admin/Clerical	Male	0	0	0
	Female	0	1	1
Operatives	Male	1	8	9
	Female	2	5	7
Total	Male	1	9	10
	Female	2	6	8
		----- 3	----- 15	----- 18

V. GOALS AND TIMETABLES

As of May 2019 Star Transit employed 18 employees. Of the 18 employees, 8 are female which is 44% of the workforce. Of the 18 employees that opted to self-identify ethnic origin, 3 identified as a minority, which is 17% of the workforce.

All Job Class categories have traditionally had a very low turnover rates. Should a position open due to resignation, retirement, or termination, Star Transit will actively recruit minorities by advertising in both the mainstream and minority newspapers, and will actively recruit females by making special announcements to women's organizations in the Eastern Shore area.

While Star Transit will continue to base its hiring decisions on the qualifications of the applicant, efforts will be made to attract female and minority applicants for all positions open.

VI. ASSESSMENT OF EMPLOYMENT PRACTICES

Star Transit is fully committed to a workforce that reflects the community we serve. Star Transit will not tolerate any person being unlawfully excluded from employment or promotion opportunities based on race, color, religion, national origin, sex (including gender identity, sexual orientation, and pregnancy), age, genetic information, disability, veteran status, or other protected class.

To meet the goals previously stated, Star Transit will:

- Post jobs on minority-focused websites, newspapers and other advertising media.
- Work with areas' workforce, training and ethnic community groups and Chambers of Commerce to reach female and minority groups.

VII. MONITORING AND REPORTING

The transit manager will conduct a semiannual meeting (December and June) with senior staff. These meetings serve to discuss the EEO Program and its implementation and meet with employees and affinity groups to seek input on the program implementation. These semiannual meetings will enable Star Transit to evaluate its EEO Program and take any necessary corrective action regarding the development and execution of programs, goals, and timetables. Following the conclusion of these semiannual meetings, the EEO Officer will report the outcomes to the ANTDC Board of Directors.

VIII. EEO COMPLAINT PROCESS

Any employee or applicant alleging to be subjected to discrimination, unfair practice, or retaliation on the basis of any of the protected classifications noted in the EEO Policy Statement may file a written complaint within 180 days of the alleged violation to the EEO Officer located at PO Box 126, Tasley, VA, 23441, or by telephone at 757-787-8322. Upon filing the complaint of alleged discrimination, the EEO Officer will proceed with an investigation to determine if there has been a violation of this policy.

If for some reason an employee or applicant does not want to bring a complaint to the EEO Officer, then the employee or applicant should contact the ANTDC Board Chair concerning the complaint. The ANTDC Board Chair can be contacted by writing to PO Box 1027, Eastville, VA 23347. The Board Chair will communicate and provide the results of his or her investigation to the EEO Officer.

Confidentiality will be maintained to the extent practical to conduct a full investigation to make a determination. All employees are required to fully cooperate during the course of an investigation.

If it is determined that a violation of this Policy has occurred, Star Transit will take immediate action to remedy the situation. Any employee who is found to have violated this policy may be subject to disciplinary action, up to and including termination.