ROARING FORK TRANSPORTATION AUTHORITY

2018-2021 Equal Employment Opportunity Program & Affirmative Action Plan

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GENERAL INFORMATION

Grant Recipient:	Roaring Fork Transportation Authority (RFTA)
Physical Address:	2307 Wulfsohn Road Glenwood Springs, CO 81601
Phone Number:	(970) 384-4974
Fax Number:	(970) 384-4937
Chief Executive Officer:	Dan Blankenship, Chief Executive Officer (CEO)
Chief Financial & Administrative Officer:	Michael Yang, CFAO
Chief Operating Officer:	Kurt Ravenschlag, COO
Program Prepared & Submitted by:	Nicole Schoon, EEO/AAP Compliance Officer nschoon@rfta.com (970) 384-4974
Plan Effective Date:	July 1, 2018
Plan Expiration Date:	June 30, 2021

RFTA's Mission/Vision Statement

"*RFTA pursues excellence and innovation in providing preferred transportation choices that connect and support vibrant communities*."

Values Statements

- ✓ **Accountable –** RFTA will be accountable to the public and its users.
- ✓ **Affordable –** RFTA will offer affordable and competitive transportation options.
- ✓ **Convenient –** RFTA's programs and services will be convenient and easy to use.
- ✓ **Dependable –** RFTA will meet the public's expectations for quality and reliability of services and facilities.
- ✓ **Efficient –** RFTA will be efficient in management, operations, and use of resources.
- ✓ **Innovative –** RFTA will be innovative in accomplishing goals.
- ✓ **Safety –** Safety is RFTA's highest priority.
- ✓ **Sustainable –** RFTA will be financially, socially, and environmentally sustainable to ensure our services continue.

INTRODUCTION

Roaring Fork Transportation Authority (RFTA) was established under the provisions of the Rural Transportation Authority Law of the State of Colorado in November 2000, through an Intergovernmental Agreement executed by the City of Aspen; Town of Basalt; Town of Carbondale; City of Glenwood Springs; Town of Snowmass Village; Eagle County; and Pitkin County. The Town of New Castle became a signatory to the Intergovernmental Agreement (IGA) and member of RFTA in November 2004.

RFTA is the second largest transit agency in Colorado and the largest rural transit agency in the nation. RFTA operates a variety of public transportation services along the State Highway 82 corridor, from Glenwood Springs to Aspen, and Interstate 70 and State Highway 6 corridors from Glenwood Springs to Rifle; covering three counties and 70 linear miles. RFTA constructed and maintains a 10' wide, multi-use Rio Grande Trail (RGT), for non-motorized uses (walking, biking, and equestrian). The Rail to Trails Conservancy selected the RGT as one of three (3) 2016 Rail-Trail Hall of Fame nominees. RFTA also owns and co-manages the 42-mile Rio Grande Railroad Corridor between Glenwood Springs and Aspen.

RFTA's Equal Employment Opportunity (EEO) Program is administered by the Regulatory Compliance Officer (RCO), and serves as the EEO Officer. The RCO reports directly to the Chief Executive Officer (CEO) and works in conjunction with the Department of Human Resources on EEO related matters.

RFTA continuously works to meet the challenges of a workplace where the majority of employees are hourly and are managed by a small staff of professionals. RFTA's CEO, RCO, Management and Human Resources staff work diligently to maintain an integrated organization with consistent policies and performance expectations.

This EEO Program is set up to address the overall philosophy and practice of equal employment opportunities. An atmosphere symbolic of RFTA's philosophy, is fostered by the successful placement of diversity within employee job position classifications. RFTA's EEO Program was developed to address the present and ongoing demands of a workforce that follows all guidelines established by the best practices approach to Equal Employment Opportunity.

EQUAL EMPLOYMENT OPPORTUNITY/AFFIRMATIVE ACTION PLAN POLICY STATEMENT

Roaring Fork Transportation Authority (RFTA) is an Equal Employment Opportunity/Affirmative Action employer in compliance with applicable federal, state and local laws.

As RFTA's Chief Executive Officer (CEO), I am committed to ensuring the essential compliance of RFTA's Equal Employment and Affirmative Action Plan. I am dedicated to the principles and spirit of Equal Employment (EEO) and Affirmative Action (AA) for all employees and employment applicants.

RFTA's Equal Employment Opportunity/Affirmative Action Policy and Program is committed to compliance with all anti-discrimination laws, regulations and policies. RFTA will ensure Equal Employment Opportunity/Affirmative Action for all employees and applicants for employment regardless of race, color, religion, national origin, sex (including pregnancy, childbirth, or related medical conditions; gender identity; and sexual orientation), age (40 years and older), genetic information, disability, veteran status, retaliation, or any other applicable status protected by federal, state or local law. No person will be unlawfully excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any RFTA program or activity receiving Federal financial assistance. We will maintain a work environment that is free of discrimination.

RFTA holds all employees, beginning with myself, Chief Executive Officer, accountable for keeping our workplace free from discrimination, and ensuring that we provide equal employment opportunities for all personnel in our workforce and for those seeking to enter our workforce. To ensure day-to-day management, including program preparation, monitoring, compliance, and complaint investigation, I have appointed Nicole Schoon, Regulatory Compliance Officer, as RFTA's Equal Employment/Affirmative Action (EEO/AA) Officer. Ms. Schoon will report directly to me and acts on my authority, with all levels of management, labor unions and employees.

RFTA maintains a responsibility to ensure that equal opportunity is given to all employees so that they may participate, contribute, and advance in our workforce. Executives, Directors, managers, and supervisors are expected to ensure that employees are given equal opportunity for training, career development programs, promotions, transfers, demotion, layoffs, terminations, awards, recognition, rates of pay or other forms of compensation, and other benefits and privileges of employment. Through management practices and decisions, including effective outreach, recruitment, hiring, and employee development we can create an inclusive workforce that reflects a broad range of diversity. Reasonable accommodations for individuals with disabilities or religious practices will be permitted, as long as those accommodations do not create undue hardships on RFTA operations. Equal opportunity to work and advance, based on merit, not unlawful bias or prejudice is the law.

This EEO/AA Policy Statement is a reminder that all RFTA employees and applicants are protected under the laws we enforce and may seek assistance if they believe they have been subject to unlawful employment discrimination. RFTA employees or applicants who believe that they have been discriminated or retaliated against have the right to file a complaint with Nicole Schoon, EEO/AA Officer; the Colorado Civil Rights Division; or the Equal Employment Opportunity Commission (EEOC). Acts of retaliation against employees or applicants, who participate in the complaint or grievance process

(investigation or proceedings), are strictly prohibited and will not be tolerated. RFTA employees share in the responsibility to avoid harassing behavior and to report such conduct.

RFTA Executives, Directors, managers and supervisors will be held accountable and will share in the responsibility of ensuring compliance is achieved through understanding, communicating, monitoring and active involvement in the support of this EEO/AAP. Performance evaluations of Executives, Directors, managers and supervisors will include evaluating the success of the EEO/AAP, in the same manner as performance on other RFTA goals.

RFTA is thoroughly committed to undertaking and establishing a written Equal Employment Opportunity/ Affirmative Action Policy and Program that sets direct, regulated policies, practices and procedures, which include specific goals and timetables.

A copy of this Equal Employment Opportunity/Affirmative Action Plan can be viewed on the RFTA website; www.rfta.com, by requesting a copy by email; nschoon@rfta.com or in writing to:

Roaring Fork Transportation Authority
Attn: Nicole Schoon, EEO/AA Officer
2307 Wulfsohn Road
Glenwood Springs, CO 81601

I am personally committed to a workplace that acts upon its daily responsibility to treat all employees and applicants with dignity, respect and equality. I expect all RFTA employees to monitor their conduct and behavior in the workplace and to act in conformance with the laws and guidelines of this Equal Employment Opportunity/Affirmative Action Plan.

_____

Dan Blankenship Date
Chief Executive Officer
Roaring Fork Transportation Authority

*A signed copy of the Equal Employment Opportunity/Affirmative Action Policy Statement; is attached as Exhibit 1 to this EEO/AAP document.

EXECUTIVE SUMMARY

Introduction

The Roaring Fork Transportation Authority (RFTA) Affirmative Action Plan (AA Plan) is a compliance document fulfilling part of the responsibilities of RFTA, as a recipient of Federal funds. In addition to complying with Federal regulations, an Affirmative Action Plan is a management tool. It includes those policies, practices and procedures that we implement to ensure Equal Employment Opportunity. The process for developing this AA Plan allows RFTA to engage in self-analysis for the purpose of identifying any barriers to equal employment opportunity. The AA Plan serves as a guide in monitoring progress and developing initiatives to enhance equal employment opportunity, and preserve diversity and equality in all sectors of employment at RFTA.

Description of Plan

This Affirmative Action Plan contains certain elements that require annual updates to incorporate current data. The first is the workforce analysis, a tabulation of RFTA's workforce by race and gender within job group categories (type of work) and organizational departments. The second is the utilization analysis, which compares RFTA's current workforce with general workforce availability data, to determine whether women or minorities are underutilized within job group categories. When underutilization of women or minorities is identified, a placement goal is set to move towards adequate representation or parity. The 2014 updates of the workforce and utilization analysis are provided in the utilization analysis section of this Plan.

Two (2) supporting sections follow these updates: 1) 2018-2021 Goals and Timetables for progress towards Placement Goals and 2) Initiatives to Alleviate Underutilization. The Timetables for Progress section includes a summary of accomplishments made during the expiring Affirmative Action Plan period (2014-2017). The Initiatives to Alleviate Underutilization section discusses areas of improvement and potential strategies and corrective actions. Processes and guidelines for assessing progress and effectiveness of the Affirmative Action Plan are described in the Monitoring and Reporting section.

The RFTA Affirmative Action Plan depicts information on the following departments:

- Department of the CEO
- Facilities, Trails and Planning
- Department of Finance
- Department of Human Resources
- Department of Information Technology
- Operations and Traveler
- Department of Vehicle Maintenance

WORKFORCE & UTILIZATION ANALYSES

RFTA's Affirmative Action Plan includes reporting and analyses for regular full-time employees. Full-time employees include all employees who work at least 37.5 hours per week. The charts below reflect the representation of minority and female employee groups in RFTA's workforce. Employee data utilized was derived from the payroll system and reflects the workforce composition for regular and seasonal, full-time employees from July 1, 2016 through June 30, 2017.

For the 2017 Affirmative Action Plan, RFTA reports 414 employees. Representation of women and minorities is presented in Figure 1 below.

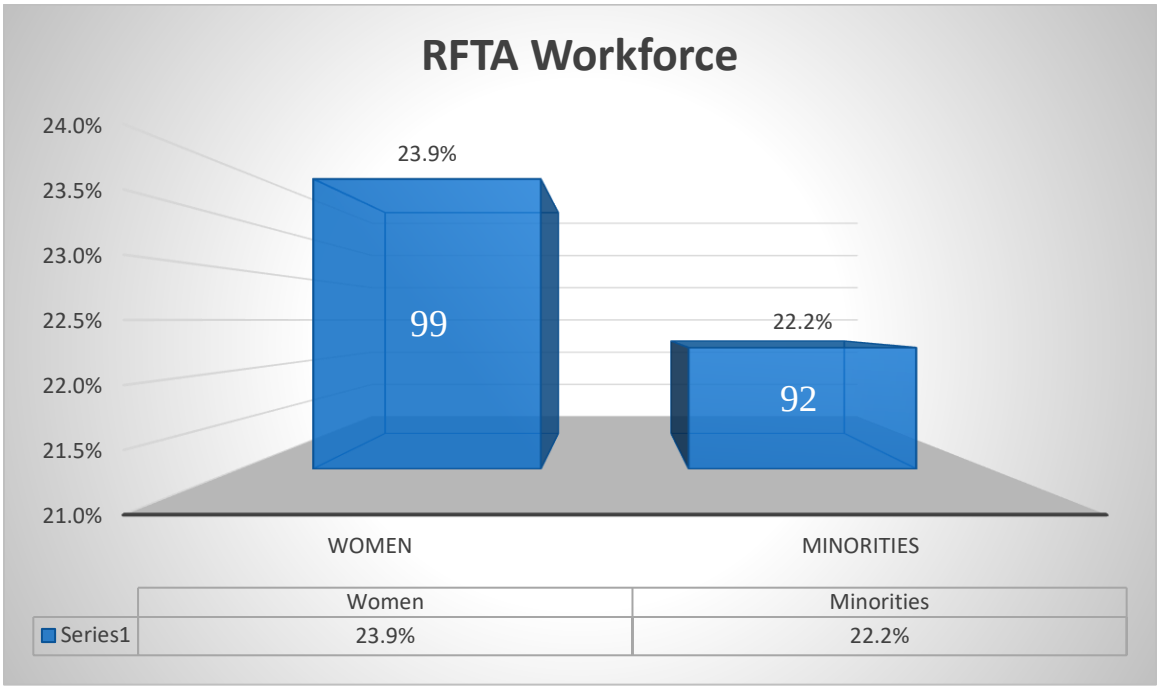


Figure 1. Representation of Women & Minority Groups

The representation of females and minorities in each of RFTA's current departments is reflected in Table 1 below.

		Females		Minorities	
Department	**Total Employees**	**Total #**	**Total %**	**Total #**	**Total %**
CEO	10	7	70.0%	2	20.0%
Facilities, Trails & Planning	24	7	29.2%	3	12.5%
Finance	10	7	70.0%	1	10.0%
Human Resources	6	5	83.3%	1	16.7%
Information Technology	10	1	10.0%	0	0.0%
Operations & Traveler	301	72	23.9%	66	21.9%
Vehicle Maintenance	53	0	0.0%	19	35.8%
Total Workforce	**414**	**99**	**23.9%**	**92**	**22.2%**

Table 1. Representation of Women & Minority Groups by Department

The following workforce changes have occurred over the past four (4) years:

- Total workforce at the development of this EEO/AAP is 24.7% more than at the beginning of the previous Plan period;
- RFTA-wide, the percentage of females employed has increased by 1.4%;
- The percentage of minorities representing the RFTA workforce has remained consistent at 22+% (22.2% in the 2014 Plan and 22.2% in the 2018 Plan);
- Hispanic/Latino employees represent 17.9% of the workforce, 1.8% lower than at the beginning of the previous Plan period;
- Asian, Black/African American, Native American and Multiracial employees has increased by 1.8% since the previous Plan and currently represent 4.3% of RFTA's workforce.

HIGHLIGHTED EMPLOYMENT ACTIVITIES

Applicant Summary

RFTA implemented a new Human Resources system through an online application process, to improve data collection, with respect to applicants for employment in May 2017. A total of 44 applicants sought employment with 100% or 44 self-identifying as to gender. Females comprised 27.3% of the applicants and 40.9% of the self-identified applicants being minority applicants. This represents a starting point to determine applicant data in future Affirmative Action Plans as applicant data information was not previously monitored.

New Hires Summary

Among the 43 new hires who joined RFTA during this reporting period, 17 or 39.5% were female, which exceeds the overall female representation within RFTA's workforce of 23.3%. During this reporting period, 20.9% of new hires were minority, which is 1.9% below RFTA's workforce of 22.8%. In the previous Plan RFTA reported 30 new hires, 8 or 26.7% were female and 6 or 20.0% were minority.

Separations Summary

During this reporting period a total of 34 employees separated from RFTA, of those leaving 14 or 41.2% were female and 10 or 29.4% were minorities. RFTA has not previously tracked female or minorities in regards to employees separating from RFTA. RFTA will begin tracking this information starting with this 2015-2018 Affirmative Action Plan.

2018-2021 AA PLAN GOALS

Based on the overall representation within RFTA's workforce, minority goals have been set for the following job category.

Category	Minority Goal	Current Workforce	% Increase	# Increase
Skilled Craft	23.3%	21.2%	2.1%	1
Service & Maintenance	34.8%	25.1%	9.7%	39

Table 2. Minority Workforce Goals

Based on the overall representation within RFTA's workforce, female goals have been set for the following job categories.

Category	Female Goal	Current Workforce	% Increase	# Increase
Professionals	36.1%	21.2%	14.9%	4
Service & Maintenance	24.7%	17.6%	7.1%	21

Table 3. Female Workforce Goals

INITIATIVES SUPPORTING AA PLAN GOALS

RFTA operates with a strong commitment to RFTA's EEO/AA program. This includes the critical component of top-level leadership support and the commitment of necessary resources to ensure that new initiatives become a reality. Although, it is important to realistically assess the readiness to move forward, based both on the current demographics of RFTA and on the cultural atmosphere and potential impediments that may exist. The underrepresentation of minorities and females in the targeted job groups should be integrated into the existing workforce planning models and used to target opportunities for affirmative action recruitment, hiring and retention.

RFTA is committed to the principles of equal employment opportunity and has identified a number of mechanisms to meet this commitment.

- Encourage leadership to create an environment of inclusion, which values differences.
- Build accountability for hiring, retaining, and developing a diverse, high-quality workforce into the annual performance reviews for executives, directors, managers, and supervisors.
- Train managers and supervisors in their EEO/AAP responsibilities as well as educating them with the existing personnel and administrative tools to help them carry out their responsibilities in these areas.
- Disseminate the Affirmative Action Plan goals throughout RFTA, and encourage managers to conduct targeted recruitment in support of these goals.
- Train employees in intercultural communication to address differences in communication across cultures.
- Attract a wider pool of talent by expanding recruiting efforts to specifically target audiences through periodical job fairs, selected colleges, and professional affiliation groups.
- Identify sources of outreach for AA group members. Determine where the candidates go to find job information, making sure that RFTA's message of it being an Equal Employment Opportunity is visible. Consider using a variety of common job search locations such as: professional organizations with the focus on AA group members; professional minority organizations; community newsletters and minority newspapers; minority or women organizations; and minority conventions and conferences.
- Ensure that the Human Resources department works closely with the EEO/AAP Officer during the recruitment process.
- Review internal Human Resources policies, processes, and operations to eliminate discrimination and to effectively attract qualified AA candidates.
- Widely publicize developmental opportunities for employees, such as detailed assignments and leadership training, to give everyone interested, a chance to participate in assignments that prepare them for higher-level positions.
- Monitor RFTA-wide numbers and trends regarding formal internal complaints and external EEO charges.

RFTA's EEO/AAP Officer in conjunction with Human Resources, plans to engage existing employees, the Amalgamated Transit Union Local 1774, external organizations, and management personnel to work collaboratively to address under representation of females and minorities in its workforce. The data secured from the EEO Tabulation 2006-2010 (5-year American Community Survey) reflects significant increases in the numbers of females and minorities in the Service &

Maintenance job group. Given the unlikelihood of the creation of a substantial number of new positions, innovative and creative means must be utilized to improve the percentage of females and minorities in this job category within RFTA's workforce.

PREFACE

This is the written Equal Employment Opportunity and Affirmative Action Plan for the Roaring Fork Transportation Authority (hereinafter referred to as RFTA). This Plan is designed to cover the reporting period from May 2014 through May 2016. The cut-off date used for RFTA data reporting purposes is June 30, 2017, the end of RFTA's 2017 fiscal year. Equal Employment Opportunity (EEO) labor market analysis and goals are based on EEO Tabulation 2006-2010 (5-year ACS data) data compiled from the U.S. Census Bureau.

This information is supplied subject to the provisions of the laws of the United States within the meaning of the Freedom of Information Act, U.S.C. 552, Title VII of the Civil Rights Act of 1964 (as amended), 42 U.S.C. 2000e et seq., the Trade Secrets Act, 18 U.S.C. 1905, and 44 U.S.C. 3508, the disclosure of which is prohibited by law and would subject the individual making the disclosure to criminal and/or civil sanctions.

In preparation of the RFTA EEO/AAP, terminology used in Executive Order 11246 and its implementing regulations has been used as a guide. Therefore, the use of such terms as "underutilization," "deficiency," "affected class," etc., should not be construed as an admission by RFTA, in whole or in part, that, in fact, either women, minorities, veterans, or individuals with disabilities have been, or are presently being, underutilized, concentrated or discriminated against in any way in violation of federal, state, or local fair employment practice laws. Further, nothing contained in the Program or its supporting data should be construed as an admission by RFTA, in whole or in part, that it has violated such federal, state or local employment practice laws.

In developing and implementing the Program, RFTA has been guided by an established policy of attempting to provide Equal Employment Opportunity. Any goals that have been established herein are not intended as rigid, inflexible quotas that must be met, but rather as targets reasonably attained by applying every ***good faith effort*** in implementing the Program.

The use of goals and timetables is not intended, nor is the effect of such goals and timetables intended, to discriminate against an individual or group of individuals with the respect to any employment opportunity for which he, she, or they are qualified on the grounds that he, she, or they are not the beneficiaries of affirmative action themselves. Certainly, nothing herein is intended to sanction the discriminatory treatment of any persons. Thus, the Program has been developed in strict reliance upon the guidelines on the Affirmative Action issued by the United States governmental agencies.

Introduction

RFTA is committed to the principles of Equal Employment Opportunity (EEO). As a result, making EEO a reality at RFTA is embedded in our core organizational values and is critical as RFTA strives to achieve a thriving internal environment through the promotion of excellence in workforce diversity. This has necessitated a top down dedication of essential resources to make employment of a highly qualified diverse workforce a business objective and strategic goal. Thus, commitment has been made to ensure that each and every current and potential employee of RFTA is treated fairly and given equal access to all opportunities throughout RFTA.

The purpose of this Program is to set forth specific, realistic, and positive result-oriented procedures to be applied towards the objective of Equal Employment Opportunity. RFTA recognizes that it provides a valuable service to its community. It is also concerned with assuring that meaningful efforts continue to address the needs of a diverse community and allow community members the opportunity to provide input into RFTA programs and activities.

While the requirement for an Equal Employment Opportunity Program is a derivative of Executive Order 11246, Title VI and Title VII of the Civil Rights Act of 1964 as well as the Federal Transit Administration's Master Grant Agreement, RFTA has and continues to be a stanch supporter of EEO not only for itself but its sub-recipients, contractors and vendors as well. Federal statues require non-discrimination on the parts of recipients that have been funded by the FTA.

Accordingly, this Affirmative Action Plan (AA PLAN) contains the status of the RFTA program and its protected classes of employees, and reflects changes in the RFTA policies and legal regulations since the submission of its 2014 plan. The present plan addresses the needs of those affected classes identified by federal and state employment and Civil Rights Laws. The RFTA Equal Employment Opportunity commitment applies to non-discrimination on the basis of race, color, religion, national origin, sex (including pregnancy, childbirth, or related medical conditions; gender identity; and sexual orientation), age (40 years and older), genetic information, disability, veteran status, retaliation, or any other applicable status protected by federal, state or local law. To this end, the guidance, direction, and activities specified in this Plan primarily address specific EEO/AA program components required to eliminate discrimination by federal grant recipients, sub-recipients, and contractors. Implementation of this EEO/AA will comply with applicable legal guidelines for non-discrimination in employment.

This Plan provides a comprehensive review of RFTA's present status. It also discusses future affirmed action-oriented approaches for development of employment systems and structures to ensure full achievement of Equal Employment Opportunity for an exemplary and diverse workforce. RFTA is progressive in its approach to the fulfillment of EEO, and invites any employee or applicant for employment to review its written Affirmative Action Plan. The AA PLAN, and attending Policy statements that follow this introduction, are available for review upon request between 8:30 a.m. and 4:30 p.m. in the office of the Regulatory Compliance Officer located in the Glenwood Springs Maintenance Facility. RFTA also makes its AA PLAN and Policy statements available online at www.rfta.com.

Equal Employment Opportunity Statement of Policy

The primary mission of the Equal Employment Officer is to develop and administer an effective EEO Program that will be carried out in accordance with the mandates and regulations of the Federal Transit Administration and other federal, state and local government statutes. Further, the mission is to server as a proactive influence concerning the fair and consistent administration and application of employment related actions. The RFTA commitment to Equal Employment Opportunity policies and practices is contained in its policy statement and signed by the Chief Executive Officer **(see Exhibit 1).**

Anti-Harassment Policy

RFTA is committed to zero tolerance of harassment and retaliation in all areas of its work environment. This commitment is embodied in a statement signed by the Chief Executive Officer, Dan Blankenship.

The statement advises all employees, contractors and subcontractors that RFTA prohibits any type of workplace harassment including, but not limited to, harassment on the basis of race, color, religion, national origin, sex (including pregnancy, childbirth, or related medical conditions; gender identity; and sexual orientation), age (40 years and older), genetic information, disability, veteran status, retaliation, or any other applicable status protected by federal, state or local law, in work related activities.

DISSEMINATION OF RFTA'S EEO/AA PROGRAM

An effective Affirmative Action Program requires that it be known and understood by persons responsible for its administration, by employees, the community-at-large, recruitment resources, subcontractors, vendors, and suppliers. RFTA has established various channels of communication to ensure that employees and the community are aware of its positive posture relative to Equal Employment Opportunity and Affirmative Action.

Nicole Schoon, RCO & EEO Officer and the Human Resources Department are responsible for the dissemination of information regarding RFTA's EEO Program.

Internal Dissemination

In order to ensure that all employees, applicants for employment, and others are aware that RFTA is an Equal Opportunity Employer and of its official policy on Equal Employment Opportunity, the following steps are taken and will continue to be undertaken:

- RFTA's Chief Executive Officer will provide the EEO/AAP to all RFTA employees.
- Managerial training programs are held with management and supervisory personnel semi-annually and on an as appropriate basis to review and explain the intent of our EEO policy and individual responsibilities for effective implementation.
- Individual meetings are held with executive management, department managers, and supervisory personnel as appropriate, to discuss policy and explain individual employee responsibilities. Managers and supervisors receive help and direction through meetings and individual counseling sessions concerning how to actively participate in the Affirmative Action Plan.
- RFTA notifies employees, employers and community leaders that RFTA is an Equal Employment Opportunity employer. This is included in the postings and job advertisements widely publicized and sent to entities.
- Employees have been notified of the existence of RFTA's Affirmative Action Program and EEO policy. For example, employees are advised that all aspects of employment, including job opportunities, training programs, and social events, will be available to all employees without regard to race, color, religion, national origin, sex (including pregnancy, childbirth, or related medical conditions; gender identity; and sexual orientation), age (40 years and older), genetic information, disability, and veteran status.
- RFTA communicates the existence of the EEO policy and Affirmative Action Program to employees at new employee orientations. Employees already on the payroll are advised semi-annually through postings, publications, and employee meetings and training sessions. Management personnel are encouraged to manually distribute EEO-related policies to their employees periodically.
- RFTA's Equal Employment Opportunity Policy and Federal and State Equal Employment Opportunity Laws are be posted on bulletin boards in heavily trafficked areas at all RFTA facilities, in break rooms, and in the Human Resources office.
- RFTA's EEO Officer meets with all employees semi-annually to seek input on the implementation of the EEO/AAP.
- The EEO/AA Policy Statement is included in RFTA-wide publications including RFTA's Employee Handbook, Driver's Handbook, employee policy manuals, and employee newsletters.

- When employees are featured in promotional material, advertising, and employee publications, both non-minority and minority men and women are featured. This is an example of integration of the EEO AA philosophy into all aspects of RFTA's culture, mission, values, vision, and strategic efforts.
- RFTA's EEO/AAP will be reviewed and revised, as needed, or every four (4) years, per the FTA EEO Program Submission Schedule, Circular 4704.1A, Section 1.4, and will be redistributed organization-wide semi-annually.
- All new managers and supervisors are provided additional EEO/AA training within 90 days of promotion.
- Copies of RFTA's Internal Complaint and Appeal Procedure, Dispute Resolution Procedure, and EEO Discrimination Complaint Process are available to all employees through the Human Resources department, the EEO Officer, and on RFTA's website www.rfta.com.

External Dissemination:

As part of RFTA's efforts to ensure effective external communication of its EEO Policy and Affirmative Action Program objectives, RFTA utilizes multiple means for conveying this information. They include, but are not limited to, the following:

- RFTA published the signed Chief Executive Officer's EEO/AA Policy Statement and the EEO Officer's contact information on RFTA's website www.rfta.com.
- Recruiting and employment sources are notified of RFTA's policy concerning Equal Employment Opportunity and Affirmative Action. When hiring occurs, RFTA aggressively recruits qualified women and minorities for all positions.
- Written notification of RFTA's EEO policy is sent to prime contractors, suppliers, sub-contractors, and the Amalgamated Transit Union Local 1774. The required EEO clauses are incorporated as part of all purchase orders and contracts. This is in accordance with the Equal Employment Opportunity clause and the requirements for Executive Order 11246, as amended, as well as, the requirements of RFTA's FTA Master Grant Agreement.
- Whenever employees are pictured in promotional material, public notices, public relations or help wanted advertising, minority and non-minority men and women will be depicted.
- RFTA will continue to identify itself as an "Equal Employment Opportunity/Affirmative Action" employer in all advertising and solicitation in both majority and minority newspapers, marketing and public relations media and material, articles, external newsletters, advertisements and public service announcements on RFTA's Internet, and external recruiting advertisements.
- The Affirmative Action Program and the EEO policy has been included in employee orientation programs and is communicated to prospective employees.

RFTA STAFF RESPONSIBILITIES

The EEO Officer has the overall responsibility for implementation of the Roaring Fork Transportation Authority's EEO/AAP. The EEO Officer is responsible for ensuring management supports and promotes EEO/AAP. The EEO Officer reports directly to the Chief Executive Officer (CEO) regarding matters relating to EEO/AAP.

Chief Executive Officer

Dan Blankenship, CEO has the essential responsibility for ensuring that Equal Employment Opportunity and Affirmative Action receive the highest level of priority. The CEO has appointed the Regulatory Compliance Officer as RFTA's EEO Officer. The CEO responsibilities include, but are not limited to, the following:

- Delegate the responsibility for overseeing, administering, implementing, and monitoring the Affirmative Action Plan to appropriate personnel;
- Ensure that those designated personnel responsible for components of the Affirmative Action Plan are, to the greatest extent possible, given the staffing necessary to successfully implement their assigned responsibilities; and
- Impart personal direction that assures total involvement and commitment to Equal Employment Opportunity and Affirmative Action.
- Set the tone and model for the rest of RFTA with his commitment to Equal Employment Opportunity (EEO), Affirmative Action (AA) and the Affirmative Action Plan (AA PLAN) and his actions.
- Value the principles of EEO, AA, and diversity, and lead on issues of equality and diversity and on the promotion of EEO/AA.
- Review and discuss the Affirmative Action Plan and Affirmative Action Goals with the Executive Management staff to identify resources for improving, if needed, the hiring and developmental opportunities of underrepresented persons.

Equal Employment Officer

Nicole Schoon, Executive Assistant to the CEO and Regulatory Compliance Officer has been appointed by the CEO as RFTA's EEO Officer. As RFTA's EEO Officer, this position has the primary management responsibility, authority, and resources for ensuring full compliance with the provisions of Executive Order 11246, as amended, and it's implementing regulations. The responsibilities of the EEO Officer include, but are not limited to, the following:

- Developing, preparing, and updating a detailed, accurate, and attainable EEO policy, a written Equal Employment Opportunity Program and Affirmative Action Plan, and internal and external communication procedures;
- Coordinating assistance to managers and supervisors in collecting and analyzing employment data, identifying problem areas, setting goals and timetables, and developing programs to achieve goals. Programs should include specific remedies to eliminate any discriminatory practices discovered in the employment system;
- Designing, implementing, and monitoring internal audit and reporting systems to measure program effectiveness and to determine where progress has been made and where further action is needed;
- Preparing and reporting an annual report to the CEO on the progress and deficiencies of each department in relation to agency goals and on compliance of contractors and vendors;

- Assuring that current legal information affecting affirmative action is disseminated to responsible and appropriate individuals;
- Coordinating in the hiring and promotion process with Human Resources;
- Keeping management up-to-date concerning new developments in the EEO/AA requirements;
- Creating an active attitude among the management staff for internal and external dissemination and adherence of RFTA's EEO/AA policies;
- Posting the EEO Policy Statement throughout RFTA and disseminates the EEO Policy Statement throughout the Roaring Fork Valley. Quarterly auditing the EEO/AAP postings to ensure the information is up-to-date and in compliance with RFTA's EEO/AAP;
- Coordinating the processing of discrimination/retaliation complaints, both internally and in connection with enforcement agencies;
- Coordinating with Human Resources, semiannually to review employment practices such as hiring, promotions, training, complaint policies, reasonable accommodation policies, performance evaluations, grievance procedures, and union agreements.

Although the Regulatory Compliance/EEO Officer has the lead on the development, coordination, and implementation of RFTA's Affirmative Action Plan, it is important to note that there are numerous departments that have collaborative and supportive EEO program responsibilities. Equal Employment is an organizational responsibility.

RFTA's Regulatory Compliance/EEO Officer is charged with the development, implementation, coordination, and monitoring of all civil rights programs required by RFTA and federal regulations, including Title VI. The Regulatory Compliance/EEO Officer ensures that RFTA manages a reasonable distribution of transit services and benefits, while clearly exhibiting a non-discriminatory impact in RFTA's decisions and activities. This dictates that the Regulatory Compliance/EEO Officer must continually design, update, modify, and implement the Title VI program which facilitate the efficient and effective review, monitoring, and measuring of equal access, equal transit services and the equal distribution of transit amenities. The Regulatory Compliance/EEO Officer is responsible for administering RFTA's Disadvantaged Business Enterprises Program which assists RFTA in strategically including minority and women-owned and small businesses to participate in contracting and business opportunities.

Director of Human Resources

Linda Forgacs, Director of Human Resources.

- Assisting RFTA's EEO/AAP Officer by facilitating the fashioning of a recruitment program that supports the accomplishment of the objectives and goals of the EEO Affirmative Action Plan;
- Ensuring that RFTA captures information on the minority, female, termination, and new hire data. This information will act as a primary and back-up source of information as needed, to meet the compliance requirements of federal and local oversight agencies;
- Ensuring recruiting minority individuals with disabilities and women applicants and establishes outreach sources;
- Serving as additional liaison between RFTA, Federal, State, and Local governments, regulatory agencies, minorities, individuals with disabilities and women's organizations, and other community groups.
- Processing employment discrimination complaints;

- Initiating and conducting investigations of any alleged or suspected discrimination or retaliation against employees and prepares a report of findings;
- Assisting in the development and facilitation of training programs to provide, managers, supervisors, and employees with Equal Employment Opportunity/Affirmative Action information to assist them in their compliance efforts and daily workplace conduct;
- Ensuring the proper display of EEO posters and policies;
- Assisting the EEO/AAP Officer in the development of enhancements to the Equal Employment Opportunity/Affirmative Action Program;
- Developing new employee orientation programs, and providing them the opportunity to read the EEO/AA Policy and sign the Equal Employment Opportunity/Affirmative Action Policy Commitment Statement **(see Exhibit 3)**;
- Developing education and training programs to provide managers and supervisors with EEO information to assist them in their compliance efforts; and
- Providing orientation to new managers and supervisors within 90 days of promotion, with special emphasis on Equal Employment Opportunity/Affirmative Action.

Managers and Supervisors

All Managers and Supervisors are required to work with the EEO/AAP Officer to achieve the following:

- Reviewing the qualifications of all applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner when hiring, promoting, transferring, and termination actions occur;
- Reviewing the job performance of each employee to assess whether personnel actions are justified based on the employee's performance of his or her duties and responsibilities;
- Reviewing training, hiring, promotion, disciplinary action, and termination patters to monitor achievement of goals and objectives and to identify problem areas;
- Ensuring fair and unbiased interviewing and selection techniques;
- Conducting outreach recruitment efforts for protected class candidates;
- Ensuring protected group members are provided with equal opportunity for hiring, training, promotion, transfer, career counseling, termination and reasonable accommodation;
- Preventing any harassment of employees who are placed through affirmative action rights;
- Implementing and adhering to the Equal Employment Opportunity/Affirmative Action Plan;
- Holding subordinate managers and supervisors responsible and accountable for implementing and adhering to the EEO/AAP; and
- Developing timelines to implement affirmative action policies, programs and goals.

All Employees

To facilitate and assist in the implementation of RFTA's Affirmation Action Plan, employees:

- Must treat their co-workers with the highest respect and regard at all times; and
- Must eliminate all forms of harassment, such as jokes about ethnic groups, religion or sex.
- Adhering to the Equal Employment Opportunity/Affirmative Action Plan
- Self-Report: The only way for RFTA's data to accurately reflect diversity of the whole organization is for all employees to self-report their gender, ethnicity, and veteran and disability status.

WORKFORCE ANALYSIS

Figures 2 and 3 below reflect the representation of minority and female employee groups in RFTA's workforce. This data reflects the workforce composition for regular, full-time employees as of June 30, 2017.

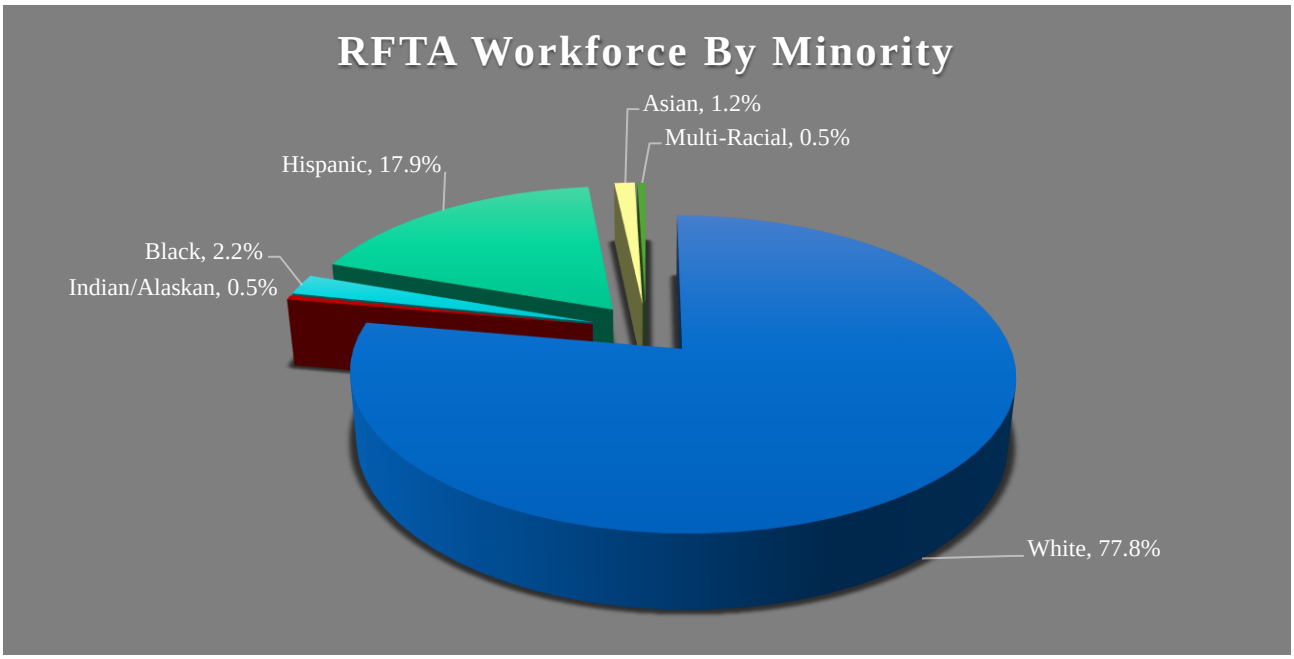
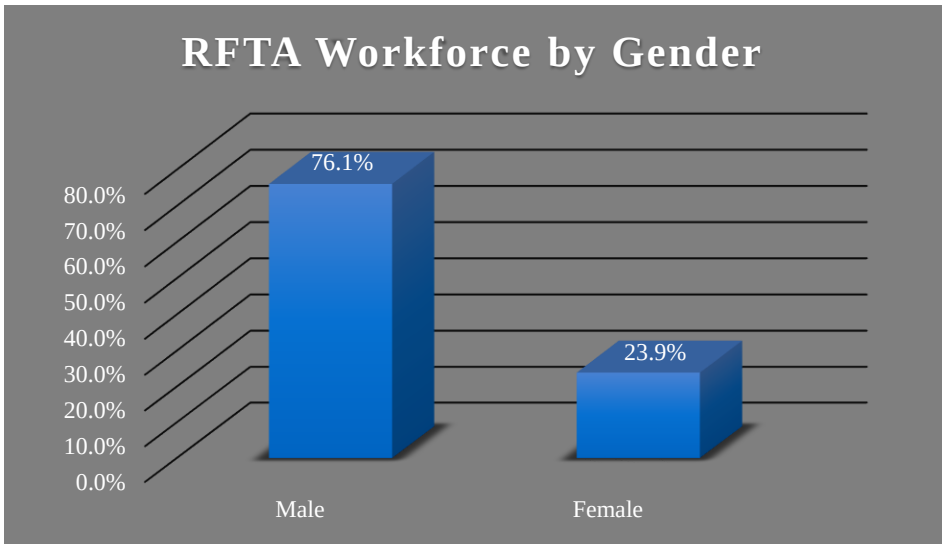


Figure 2. Representation of Minorities in RFTA's Workforce

Race/Ethnicity		
White	322	77.8%
American Indian	2	0.5%
Black	9	2.2%
Hispanic	74	17.9%
Asian	5	1.2%
Multi-Racial	2	0.5%
Total Workforce	**414**	**100%**



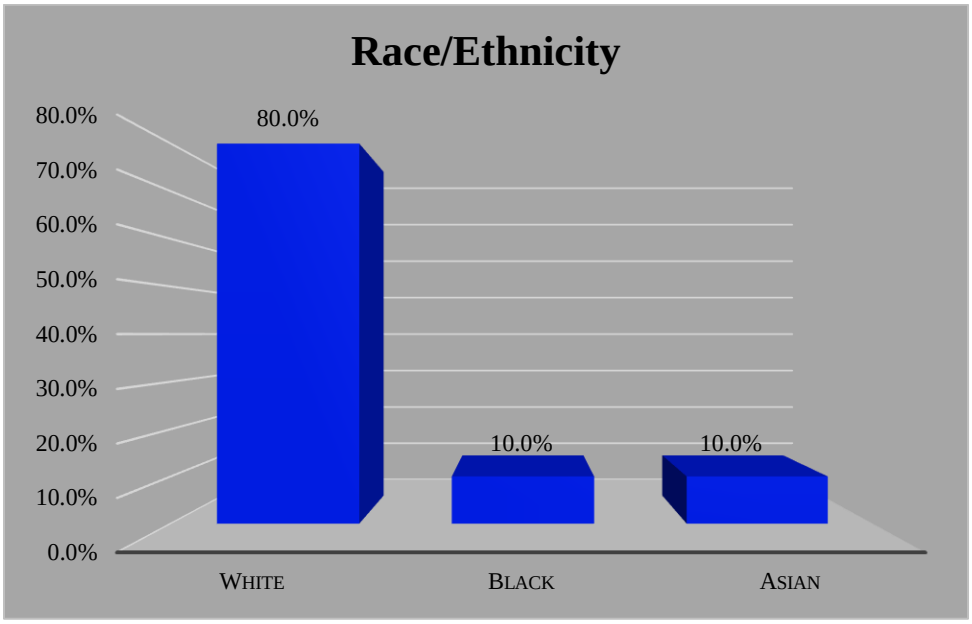
Gender		
Male	315	76.1%
Female	99	23.9%

Figure 3. Representation of Women in RFTA's Workforce

RFTA WORKFORCE BY DEPARTMENT

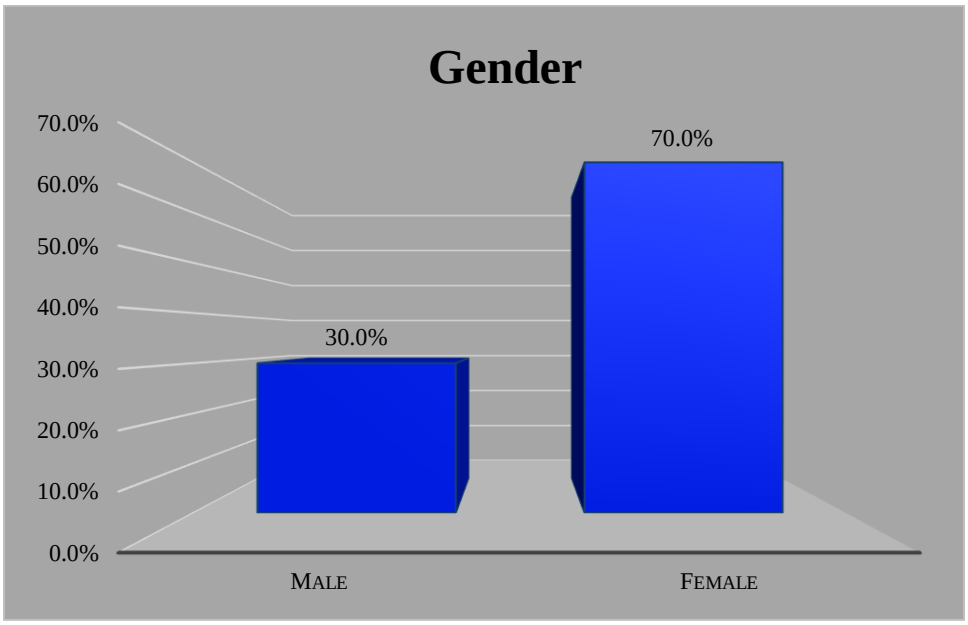
Figures 4 through 17 below reflect the breakdown of RFTA's workforce by department, with regards to race/ethnicity and gender.

Department of the Chief Executive Officer (CEO)



Race/Ethnicity		
White	8	80.0%
Black	1	10.0%
Asian	1	10.0%
Total	**10**	**100%**

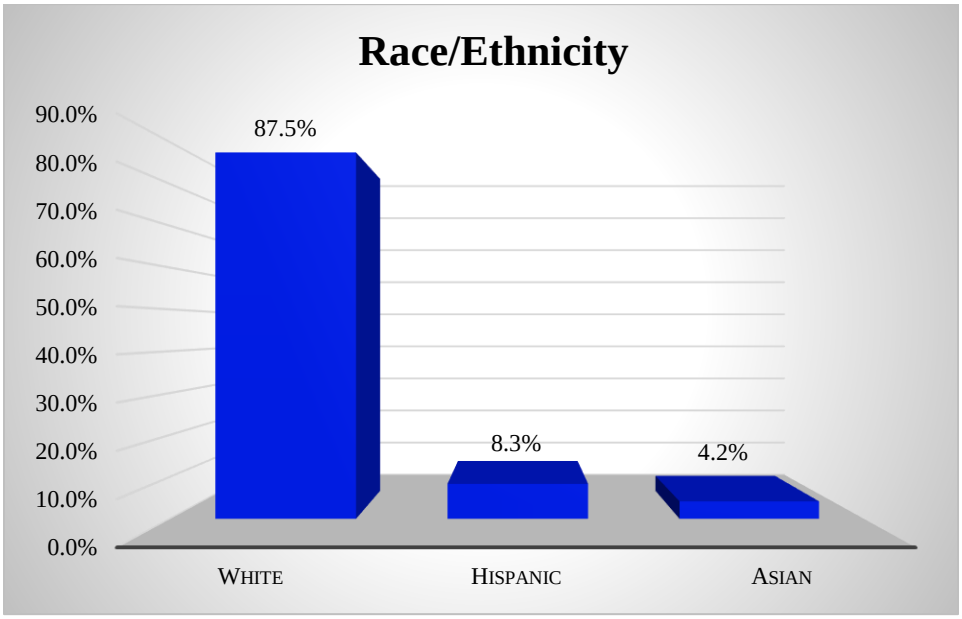
Figure 4. Representation of Minorities-CEO Department



Gender		
Male	3	30%
Female	7	70%

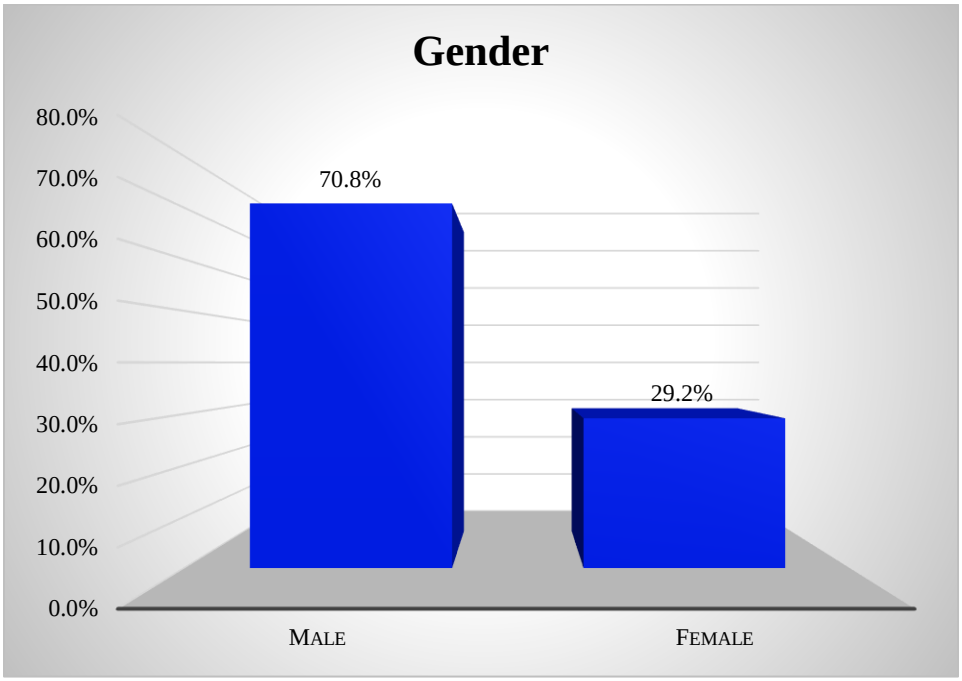
Figure 5. Representation of Women-CEO Department

Facilities, Trails & Planning Departments



Race/Ethnicity		
White	21	87.5%
Hispanic	2	8.3%
Asian	1	4.2%
Total	**24**	**100%**

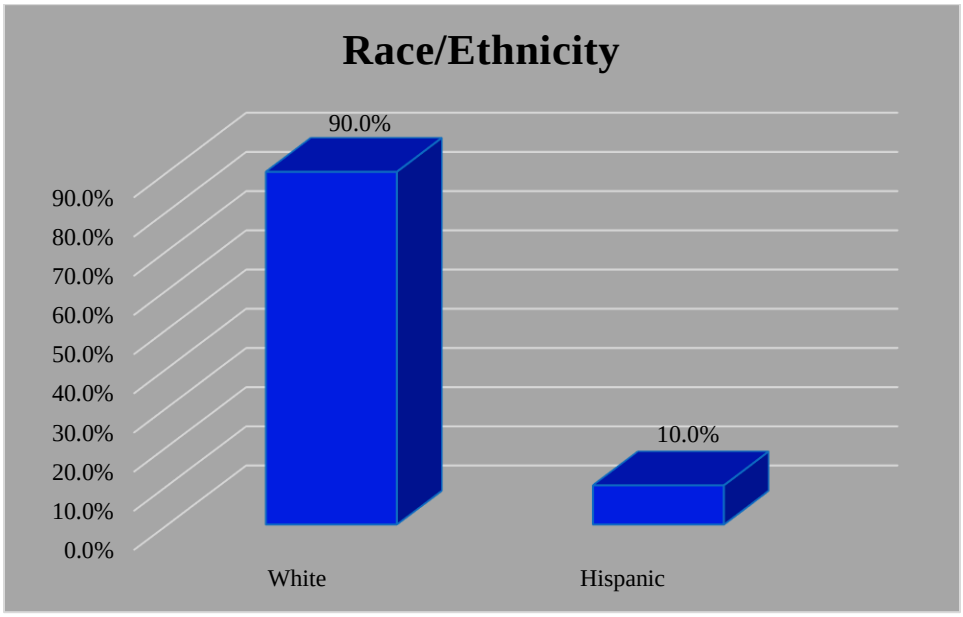
Figure 6. Representation of Minorities-Facilities, Trails & Planning Departments



Gender		
Male	17	70.8%
Female	7	29.2%

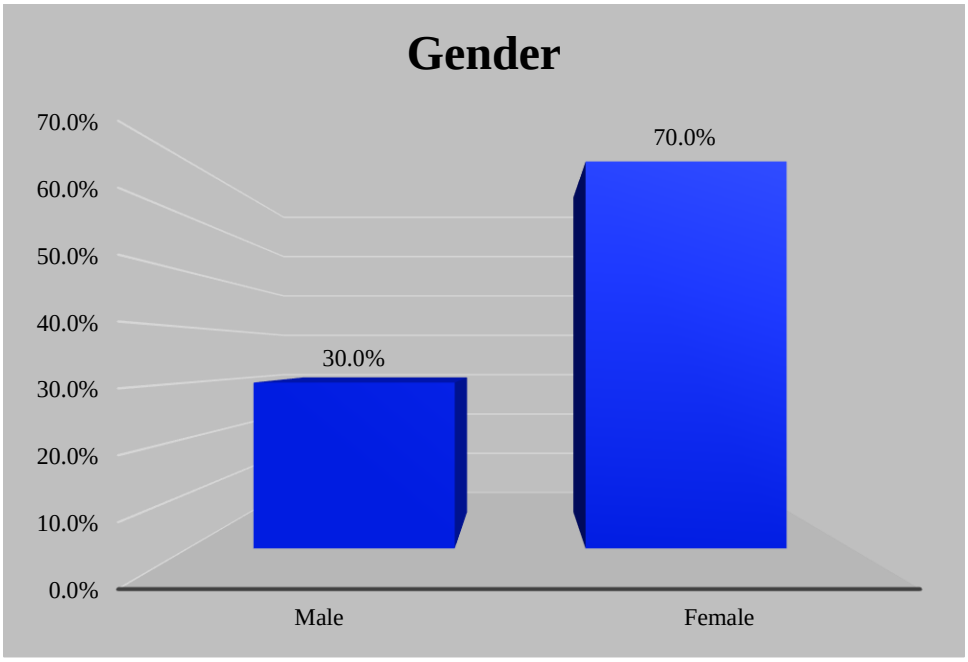
Figure 7. Representation of Women-Facilities, Trails & Planning Departments

Finance Department



Race/Ethnicity		
White	9	90.0%
Hispanic	1	10.0%
Total	**10**	**100%**

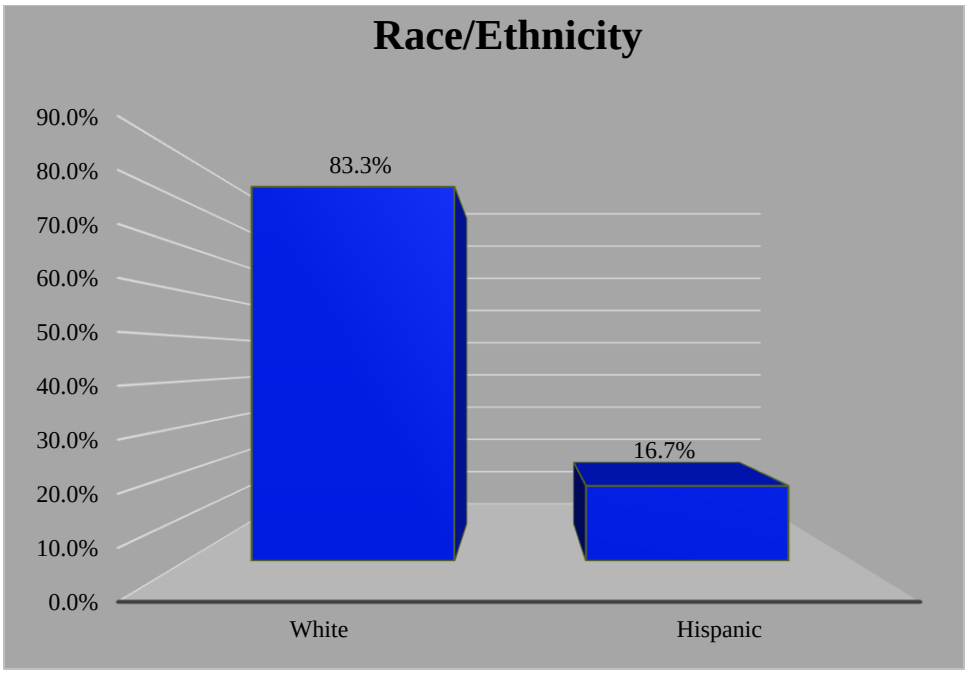
Figure 8. Representation of Minorities-Finance Department



Gender		
Male	3	30.0%
Female	7	70.0%

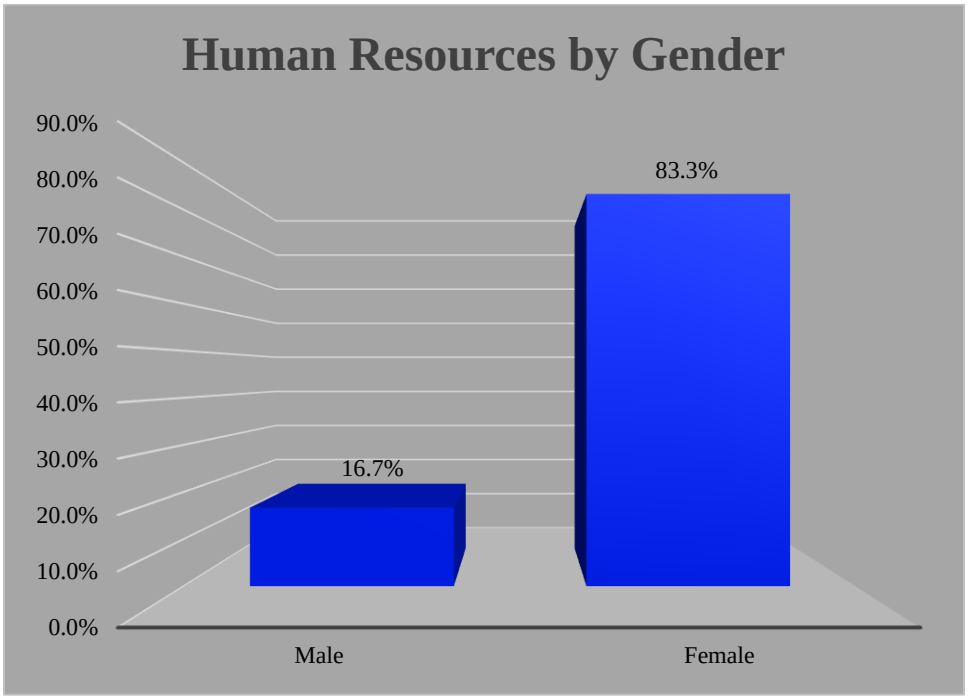
Figure 9. Representation of Women-Finance Department

Department of Human Resources



Race/Ethnicity		
White	5	83.3%
Hispanic	1	16.7%
Total	**6**	**100%**

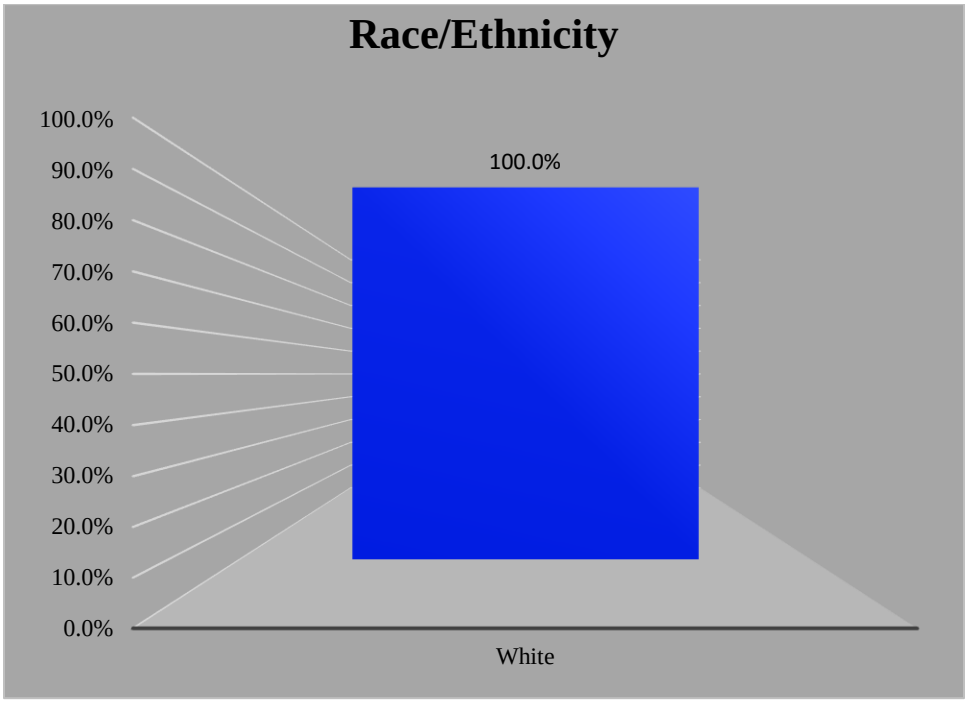
Figure 10. Representation of Minorities-Human Resources Department



Gender		
Male	1	16.7%
Female	5	83.3%

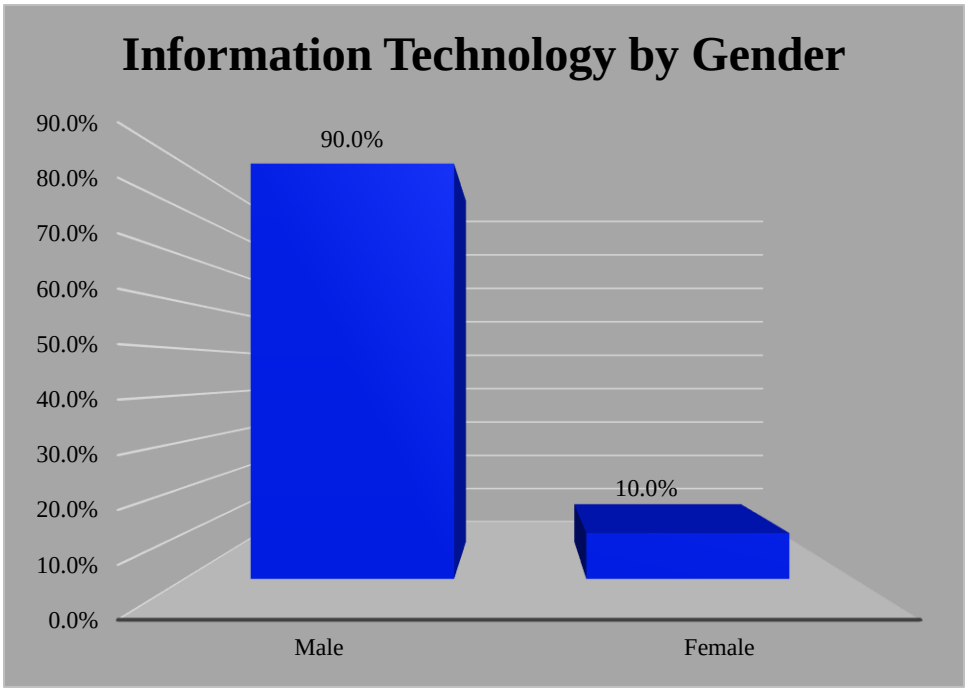
Figure 11. Representation of Women-Human Resources Department

Department of Information Technology (IT)



Race/Ethnicity		
White	10	100%
Total	10	100%

Figure 12. Representation of Minorities-IT Department



Gender		
Male	9	90%
Female	1	10%

Figure 13. Representation of Women-IT Department

Operations & Traveler Departments

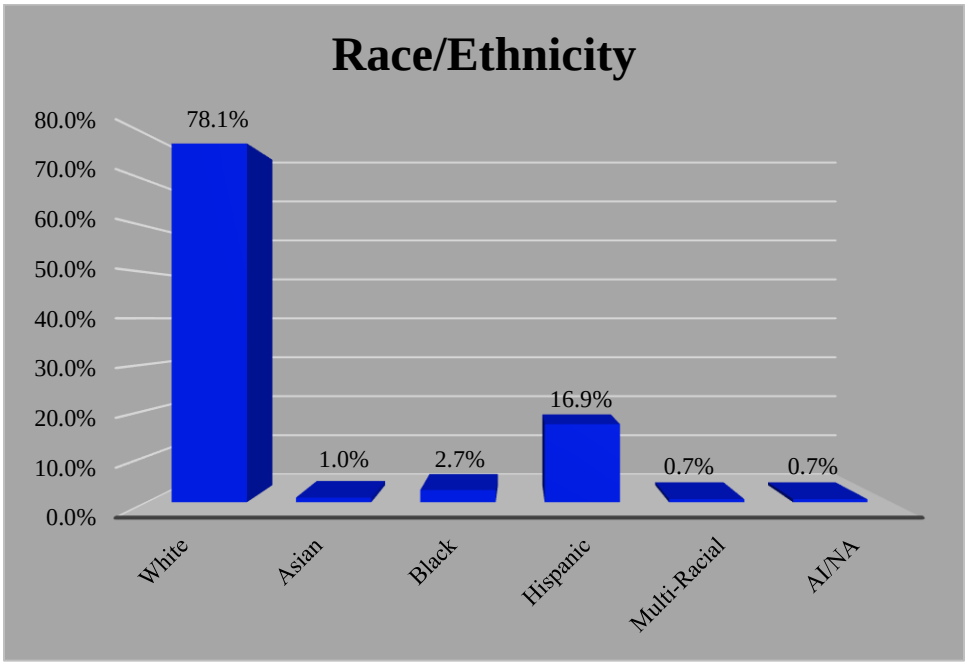


Figure 14. Representation of Minorities-Operations & Traveler Departments

Race/Ethnicity		
White	235	78.1%
Asian	3	1.0%
Black	8	2.7%
Hispanic	51	16.9%
Multi	2	0.7%
AI/NA	2	0.7%
Total	301	100%

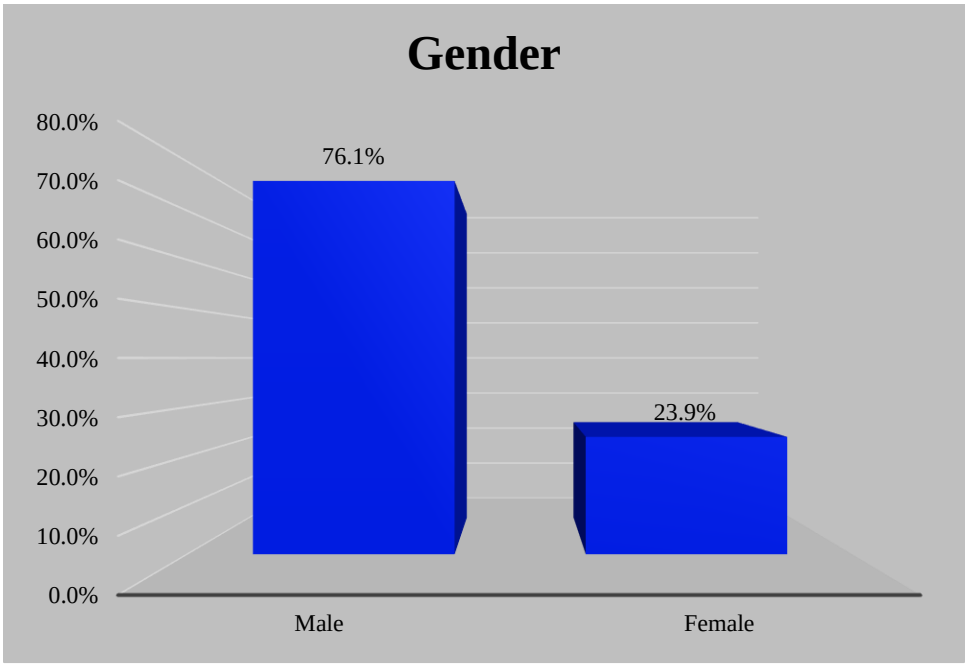


Figure 15. Representation of Women-Operations & Traveler Departments

Gender		
Male	229	76.1%
Female	72	23.9%

Department of Vehicle Maintenance

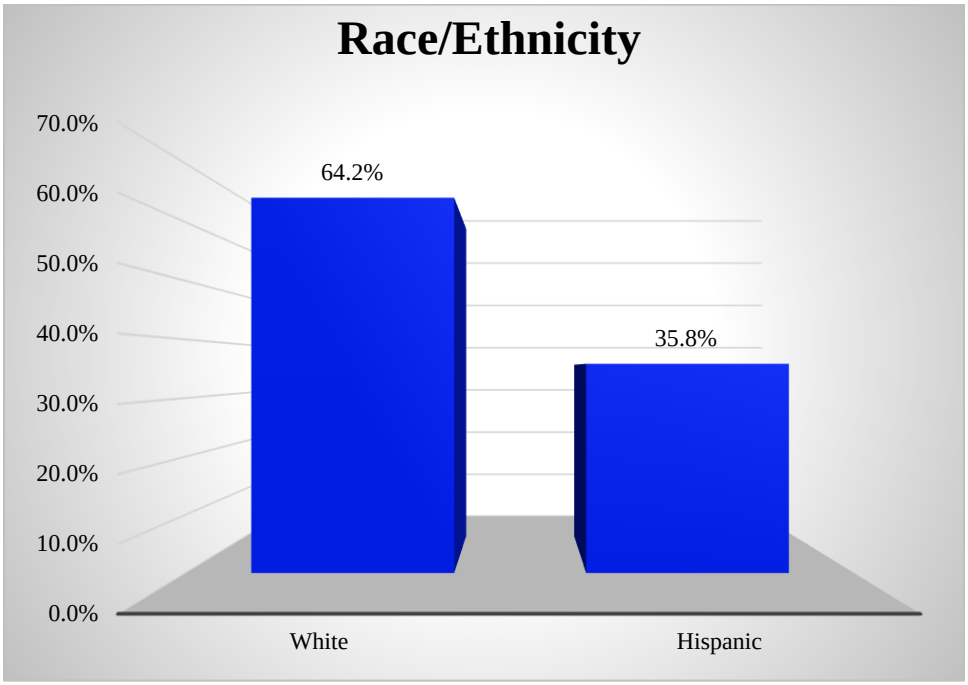


Figure 16. Representation of Minorities-Vehicle Maintenance Department

Race/Ethnicity		
White	34	64.2%
Hispanic	19	35.8%
Total	53	100%

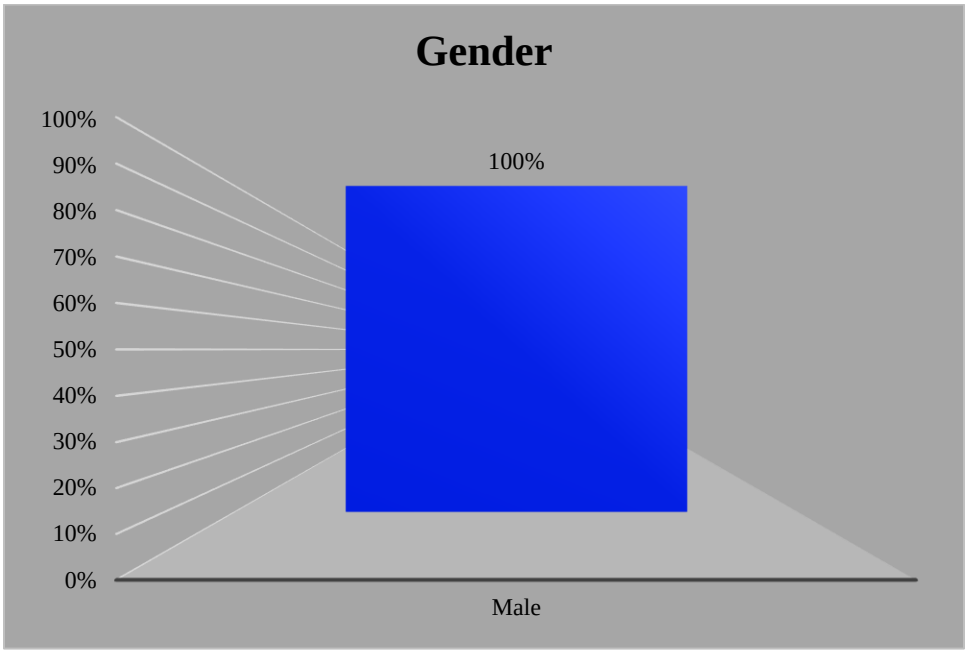


Figure 17. Representation of Women-Vehicle Maintenance Department

Gender		
Male	53	100%

JOB GROUP AND AVAILABILITY ANALYSIS

RFTA groups individual jobs and positions into Job Groups, which mirror the categories of the EEO-4 reporting requirements. This aggregates jobs by similarity of wages, content and opportunity. RFTA does not utilize the categories of Protective Service Workers and Paraprofessionals, due to an insufficient size to permit meaningful analysis with respect to representation and utilization. The charts and narratives which follow reflect the total number of employees, the breakdown of employees by gender and race/ethnicity, and reflect the salary ranges being paid to those employees in each job group. The analyses incorporate the percentage of minorities and females in each job group.

Overview

This chart represents the number of employees in each job category at RFTA.

EEO-4 Job Category	# of Employees
Officials & Administrators	12
Professionals	33
Administrative Support	15
Skilled Craft	47
Service & Maintenance	307
Total	**414**

Table 4. RFTA Workforce by Job Category

RFTA utilized the percentage of minorities and females in each of the job groups as reflected in the EEO Tabulation 2006-2010 (5-year ACS data) data from the U.S. Census Bureau to establish the availability of females and minorities and identify underutilization. (***Note:*** The next EEO Tabulation release will be by Fall 2020/Spring 2021, which will use the 2014-2018 5-year American Community Survey (ACS) dataset.) RFTA considers and seeks applicants for its Officials and Administrators positions to be from the State of Colorado. For all other positions, the relevant labor market is the Roaring Fork Valley, which includes, Garfield County, Pitkin County and a portion of Eagle County.

The following tables reflect the breakdown of each of the job groups by gender, race, and salary range. Included are the availability percentages for females and for the individual minority groups in each job group. Underutilization is identified where the percentage of females or a particular minority group employed in a job group is less than the percentage of females or that particular minority group reflected in the labor market statistics for that job group.

Officials & Administrators

Based on RFTA's workforce as of June 30, 2017, there are 15 employees in this job group. There is no underutilization of females or minorities in the **Officials & Administrators** job group. The representation of females at 25.0% is slightly higher than the EEO Tabulation 2006-2010 (5-year ACS data) data of 18.9%, for the State of Colorado., reflected for this job group, there is no underutilization of females as shown in Table 5 below. There is no underutilization of minorities in the **Officials & Administrators** job group.

Officials & Administrators	White	AI/AN	Black	H/L	Asian	NH/PI	Multi
Salary Ranges							
Female							
$70 Plus	3						
Total Females	3						
Percentage of Females	**25.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**
Female Availability	18.9%	0.2%	1.2%	1.1%	0.8%	0.0%	0.2%
Male							
$70 Plus	8				1		
Total Males	8				1		
Percentage of Males	**66.7%**	**0.0%**	**0.0%**	**0.0%**	**8.3%**	**0.0%**	**0.0%**
Male Availability	69.0%	0.2%	2.2%	2.9%	2.5%	0.0%	0.7%

Table 5. Representation of Women & Minorities by Officials & Administrators

Professionals

There are 33 employees in this job group as shown in Table 6 below. Within this job group the utilization of females is less than the availability in the EEO Tabulation 2006-2010 (5-year ACS data) data for the Roaring Fork Valley. Specifically females comprise only 21.2% of the **Professionals** job group while the relevant labor market data indicates females hold 36.0% of this job group in the Roaring Fork Valley. This indicates underutilization of females in the **Professionals** job group at 14.8%. There is no underutilization of minorities in the **Professionals** job group.

Professionals	**White**	**AI/AN**	**Black**	**H/L**	**Asian**	**NHOPI**	**Multi**
Salary Ranges							
Female							
$43-$54,999	1			1			
$55-$69,999	3		1				
$70 Plus	3			1			
Total Females	3		1	2			
Percentage of Females	**21.2%**	**0.0%**	**3.0%**	**6.1%**	**0.0%**	**0.0%**	**0.0%**
Female Availability	36.0%	0.0%	0.2%	1.0%	0.7%	0.0%	0.4%
Male							
$43-$54,999	8						
$55-$69,999	4						
$70 Plus	11						
Total Employees	23						
Percentage of Males	**69.7%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**
Male Availability	57.0%	0.1%	0.0%	2.5%	1.7%	0.0%	0.4%

Table 6. Representation of Women & Minorities by Professionals

Administrative Support

There are 15 employees in this job group as shown in Table 8 below. There is no underutilization of females in the Administrative Support job group at 80.0% based on the availability in the EEO Tabulation 2006-2010 (5-year ACS data) data of 52.1% for the Roaring Fork Valley. There is no underutilization of minorities in the Administrative Support job group.

Administrative Support	White	AI/AN	Black	H/L	Asian	NHOPI	Multi
Salary Ranges							
Female							
$25-$32999	2						
$33-$42999	3						
$43-$54999	6						
$55-$69999	1						
Total Females	12						
Percentage of Females	**80.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**
Female Availability	52.1%	0.1%	0.1%	5.5%	0.1%	0.2%	1.0%
Male							
$25-$32999				1			
$33-$42999							
$43-$54999	2						
Total Males	2			1			
Percentage of EEO Category	**13.3%**	**0.0%**	**0.0%**	**6.7%**	**0.0%**	**0.0%**	**0.0%**
Minority Availability	29.5%	0.0%	0.1%	1.0%	0.4%	0.0%	1.4%

Table 7. Representation of Women & Minorities by Administrative Support

Skilled Craft

There are 34 employees in this job group as shown in Table 9 below. There is no underutilization of females within this job group based on the availability in the EEO Tabulation 2006-2010 (5-year ACS data) data for the Roaring Fork Valley. Within this job group the utilization of minorities is less than the availability in the EEO Tabulation 2006-2010 (5-year ACS data) data for the Roaring Fork Valley. Specifically minorities comprise only 19.1% of the **Skilled Craft** job group while the relevant labor market data indicates minorities hold 22.3% of this job group in the Roaring Fork Valley. This indicates underutilization of females in the **Skilled Craft** job group at 3.2%.

Skilled Craft	White	AI/AN	Black	H/L	Asian	NHOPI	Multi
Salary Ranges							
Female							
$43-$54999	3						
Total Females	3						
Percentage of Females	**6.4%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**
Female Availability	2.1%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%
Male							
$33-$42999	8			2			
$43-$54999	9			2	1		
$55-$69999	9			3			
$70 Plus	8			2			
Total Males	34			9	1		
Percentage of EEO Category	**72.3%**	**0.0%**	**0.0%**	**19.1%**	**2.1%**	**0.0%**	**0.0%**
Minority Availability	74.6%	0.3%	0.0%	22.3%	0.0%	0.0%	0.6%

Table 8. Representation of Women & Minorities by Skilled Craft

Service & Maintenance

There are 307 employees in this job group as shown in Table 10 below. Within this job group the utilization of females is less than the availability in the EEO Tabulation 2006-2010 (5-year ACS data) data for the Roaring Fork Valley. Females comprise only 17.6% of the **Service & Maintenance** job group while the relevant labor market data indicates females hold 24.7% of this job group in the Roaring Fork Valley. This indicates underutilization of females in this job group at 7.1%. Minorities comprise only 20.2% of this job group while the relevant labor market indicates minorities hold 33.1% of the Service & Maintenance job group in the Roaring Fork Valley. This indicates underutilization of minorities at 12.9% in the **Service & Maintenance** job group.

Service & Maintenance	White	AI/AN	Black	H/L	Asian	NHOPI	Multi
Salary Ranges							
Female							
$25-$32999	1						
$33-$42999	33	1	4	8	1		
$43-$54999	9			2			
$55-$69999	10			1			
$70 Plus	1						
Total Females	54	1	4	11	1		
Percentage of Females	**17.6%**	**0.3%**	**1.3%**	**3.6%**	**0.3%**	**0.0%**	**0.0%**
Female Availability	24.7%	0.1%	0.0%	11.9%	0.3%	0.0%	0.3%
Male							
$25-$32999	1						
$33-$42999	118	1	4	26	2		2
$43-$54999	33			17			
$55-$69999	19			8			
$70 Plus	5						
Total Males	176	1	4	51	2		2
Percentage of Males	**57.3%**	**0.3%**	**1.3%**	**16.6%**	**0.7%**	**0.0%**	**0.7%**
Minority Availability	40.3%	0.1%	0.0%	21.2%	0.3%	0.3%	0.3%

Table 9. Representation of Women & Minorities by Service & Maintenance

SUMMARY ASSESSMENT OF CURRENT WORKFORCE

A summary of the current workforce and utilization analysis as of June 30, 2017 is shown in Tables 11 and 12 below. The first chart reflects all EEO job categories, the utilization of females in each job category and the availability percentages of females represented in each job category in the relevant labor markets. The second chart reflects data relevant to the utilization of specific minority groups in RFTA's workforce.

Female Demographics

Category	White		Native American		Black		Hispanic		Asian		Under Utilized	GOAL
	%	#	%	#			%	#	%	#		%
Officials & Administration	25.0%	3									No	No Goal
State of Colorado Availability	18.9%											
Professionals	21.2%	7			3.0%	1	6.1%	2			Yes	36.0%
Roaring Fork Valley Availability	36.0%				0.2%		1.0%					
Administrative Support	80.0%	12									No	No Goal
Roaring Fork Valley Availability	52.1%											
Skilled Craft	6.4%	3									No	No Goal
Roaring Fork Valley Availability	2.1%											
Service & Maintenance	17.6%	54	0.3%	1	1.3%	4	3.6%	11	0.3%	1	Yes	24.7%
Roaring Fork Valley Availability	24.7%		0.1%		0.0%		11.9%		0.3%			

Table 10. Representation & Utilization of Women in RFTA's Workforce

Demographics by Race/Ethnicity

Category	Black		Native American		Hispanic		Asian		Multi		Under Utilized	Goal
	%	#	%	#	%	#	%	#	%	#		%
Officials & Administration							8.3%	1			No	No Goal
State of Colorado Availability							3.3%					
Professionals	3.0%	1			6.1%	2					No	No Goal
Roaring Fork Valley Availability	0.2%				3.5%							
Administrative Support					6.7%	1					No	No Goal
Roaring Fork Valley Availability					6.5%							
Skilled Craft					19.1%	9	2.1%	1			Yes	22.3%
Roaring Fork Valley Availability					22.3%		0.0%					
Service & Maintenance	2.6%	8	0.6%	2	20.2%	62	1.0%	3	0.7%	2	Yes	33.1%
Roaring Fork Valley Availability	0.0%		0.2%		33.1%		0.6%		0.6%			

Table 11. Representation of Minorities in RFTA's Workforce

GOAL-SETTING METHODOLOGY

Goals are defined as, "the results towards which efforts are directed." Goals are flexible targets for hiring and promoting affected group members in job groups where underutilization exists in an attempt to reach parity. Factors taken into consideration when establishing RFTA's placement goals include:

1) Availability of females and minorities (civilian labor force statistics);
2) Projected hiring opportunities based on historical data, including turnover;
3) Projected promotional opportunities based on historical data and budget considerations;
4) Adverse Impact Analysis from prior years;
5) Workforce Analysis/Underutilization figures from prior years.

Determination of areas requiring Affirmative Action and establishment of appropriate goals and objectives is the base for evaluation of effectiveness of this Affirmative Action Program. The three basic components of this process are:

1) Annual evaluation of the workforce by gender and race within job groups for RFTA;
2) Study of the patterns in each case and identification of positions which indicate an underutilization or over concentration of affected groups; and
3) Establishment of goals to produce an equitable representation of affected groups as practically possible.

RFTA Affirmative Action efforts are directed toward achieving a level of gender and minority representation in all job groups equivalent to availability. RFTA establishes percentage placement goals equal to the availability for al underutilized job groups and make good faith efforts to recruit a broad and inclusive pool of qualified applicants including women and minorities. The percentage placement goals established for job groups identified as underutilized are found in the table below. In job groups identified as underutilized, placement goals are set equal to the availability percentages specified in these tables.

It should be noted that goals do not require or mandate the selection of unqualified persons or preferential treatment proffered based on protected factors such as race, national origin, or gender. Rather, goals can be attained through effective identification and elimination of problems and/or barriers to equal employment opportunity.

Affirmative Action goals are not to be used to discriminate against any applicant tor employee because of race, color, religion, national origin, sex (including pregnancy, childbirth, or related medical conditions; gender identity; and sexual orientation), age (40 years and older), genetic information, disability, veteran status, retaliation, or any other applicable status protected by federal, state or local law. These goals are not "rigid and inflexible quotas which must be met, instead they are reasonably attainable by means of applying every good faith effort to make the Affirmative Action Program work."

Goals addressing underutilization rates of employees are based on assumptions at the time the analysis was performed, therefore, if assumptions change, goals will also change. Goals must remain flexible due to statistical variances, which may occur. Therefore, RFTA's recruitment process, while aggressively recruiting in under-utilized areas, continues to apply equal employment opportunity to all groups.

Parity: Success in achieving Affirmative Action Goals for employment are often measured by concept of equity called parity. Parity goals are the percentage of representation of a protected group within the workforce that is equal to the percentage of such persons in the availability base for the protected group. RFTA has determined to set as its placement goals the availability percentage in the relevant labor market for the underutilized groups.

PROGRESS TOWARDS NUMERICAL PLACEMENT GOALS

Female Goals Established in the 2011-2014 Plan

In assessing progress towards established goals it should be noted that in the previous Plan RFTA employees were counted in categories that differed from the established EEO job categories. Reporting any improvements made towards accomplishment of the 2011-2014 goals will be described using the groupings from that Plan. There were 325 employees in the 2011-2014 Plan, 73 or 22.5% were females and 72 or 22.2% were minorities. In the previous 2011-2014 Plan, females were reported to be underutilized in five (5) job groups, **Officials and Managers, Technicians, Administrative Support Workers, Craft Workers, and Operatives**.

Currently, females represent 23.9% and minorities represent 22.2% of the workforce at RFTA. During the previous plan period, RFTA increased its overall female representation by 1.4%. One of the job groupings in the 2011-2014 Plan separated certain positions within the Officials & Administrators EEO category into Executives & Officials/Managers. This separation resulted in the appearance of underutilization of females within the Executives & Officials/Managers and the establishment of a female goal of 35.7% for this job group.

Executives and Officials/Managers

There were 4 or 21.1% females holding Executives & Officials/Managers positions in the 2011-2014 Plan. In the current Plan there are 3 females holding Executives & Officials/Managers positions. The decrease of 1 employee or 25.0% decrease in female employees, decreased female representation in the Executives & Officials/Managers job group to 25.0% and constituted no progress towards the 35.7% goal established. RFTA made *good faith efforts* to do so by, 1) educating female employees of job opportunities in this job category; and 2) building relationships with organizations to help act as recruiting sources for women in the Roaring Fork Valley. In preparing this current Plan all employees holding Officials & Administrators positions were counted in evaluating representation in that EEO category. It was determined that females are not underutilized in the Officials & Administrators job category in the current Plan.

Craft Workers

In the 2011-2014 Plan, only certain positions were counted in the Craft Workers job group as a result of separating some positions and counting them as semi-skilled positions. It was determined that females were underutilized in the Craft Workers job group and a goal of 4.1% was established for females. There were 0 females holding Craft Workers positions in the 2011-2014 Plan. In the current Plan there are 3 females holding Craft Workers positions, under the job grouping of the previous Plan. Significant progress was made in increasing the number of females utilized in the Craft Workers job group. In preparing the current Plan all positions in the EEO Skilled Craft job category were counted in evaluating underrepresentation. As a result the difference between the representation of females in Skilled Craft positions at RFTA and the representation of females in that job category in the relevant labor market is the same as the previous Plan. Currently females comprise 6.4% of the Skilled Craft employees while the Roaring Fork Valley labor data reflects females comprise 2.1% of that job group.

RFTA made ***good faith efforts*** to do so by, 1) educating female employees of job opportunities in this job category; and 2) building relationships with organizations to help act as recruiting sources for women in the Roaring Fork Valley. Lastly, when opportunities were filled internally RFTA made sure that the hiring

manager had knowledge of the existence of the Affirmative Action goals for this job group. During the 2011-2014 Plan period parity in the Craft Workers job group was achieved.

Operatives

With respect to the Operatives job group in the 2011-2014 Plan, these positions were separated from the Service & Maintenance job category and a female goal of 23.1% was established. There were 47 females holding Operatives positions in the 2011-2014 Plan. In the current Plan there are 54 females holding Operatives positions. The increase of 7 female employees constitutes a 14.9% increase for females in the Operatives job group.

During the 2011-2014 Plan period RFTA made *good faith efforts* to do so by, 1) educating female employees of job opportunities in this job category; and 2) building relationships with organizations to help act as recruiting sources for women in the Roaring Fork Valley. When opportunities were filled internally RFTA made sure that the hiring manager had knowledge of the existence of the Affirmative Action goals for this job group. In preparing the current Plan, Operatives positions were counted along with other jobs in the Service & Maintenance job category evaluating underrepresentation. Based on the current representation of females of 17.6% in the Service & Maintenance job category there continues to be underutilization of females.

Administrative Support

In the 2011-2014 Plan, there were 11 females employed in the Administrative Support job group, comprising 40.7% of that job group. In the current Plan there are 12 females holding Administrative Support positions under the job groupings off the previous Plan. The one additional employee or 9.0% increase in female employees' increased female representation in the Administrative Support job group to 80.0% as utilized in the previous plan. This exceeded the availability under the 2011-2014 Plan and the goal was achieved.

Minority Goals Established in the 2011-2014 Plan

The representation of minorities for all job groups has remained relatively consistent. The 2011-2014 Plan reflected underutilization of minorities when compared with availability, in the following job groups: Administrative Support and Operatives. RFTA met the minority goal for Administrative Support as discussed in detail below. It should again be noted that in the previous plan RFTA employees were counted in categories that differed from established EEO job categories. Reporting any improvements made towards accomplishment of the 2011-2014 goals will be described using the groupings from that Plan.

Administrative Support

In the 2011-2014 Plan there was 1 minority employed in the Administrative Support job group comprising 3.7% of that job group. In the current Plan there is still only 1 minority holding Administrative Support positions under the job groupings of the previous Plan. With no change in the number of employees there was increase in minority representation in the Administrative Support job group to 6.7%.

During the 2011-2014 Plan period RFTA made ***good faith efforts*** to do so by, 1) educating minority employees of job opportunities in this job category; and 2) building relationships with organizations to help act as recruiting sources for minorities in the Roaring Fork Valley. When opportunities were filled internally RFTA made sure that the hiring manager had knowledge of the existence of the Affirmative

Action goals for this job group. Based on the current representation of minorities at 6.7% in the Administrative Support job category there is no longer an underutilization of minorities in this job category.

Operatives

In the 2011-2014 Plan there were 43 minorities employed in the Operatives job group comprising 20.3% of that job group. In the current Plan there are 77 minorities holding Operatives positions under the job groupings of the previous Plan. The additional 34 employees or 79.1% increase in minority employees increased minority representation in the Operatives job group to 42.7% as utilized in the previous Plan. This exceeded the availability under the 2011-2014 Plan and the goal was achieved.

During the plan year, RFTA made *good faith efforts* to increase minority representation, as mentioned in the outreach section, and appear to be having some positive impacts. It should be noted that in preparing the previous Plan, individual positions were counted in different job groups (most notably the separation of Executives from the Officials and Administrators). In preparing this Affirmative Action Plan, RFTA has returned to using the EEO categories as the job groups and has realigned positions accordingly.

ESTABLISHMENT OF PLACEMENT GOALS

The utilization of females and minorities has been examined in an in-depth fashion through the analyses contained in this Plan. Based on the comparison of the RFTA workforce and the availability of females in the relevant labor markets where prospective employees are recruited, there is underutilization of females in two (2) job groups; **Professionals** and **Service & Maintenance**. Goals have been established for those job groups and are discussed below.

Goal 1 – Professionals – Underutilization of Females

Based on the EEO Tabulation 2006-2010 (5-year ACS data) data for the Roaring Fork Valley, the current representation of females is less than the availability of female Professionals in the relevant labor market. Specifically, females comprise only 21.2% while the relevant labor market indicates females hold 36.0%, of the Professionals job group in the Roaring Fork Valley. RFTA has set a goal of 36.0% in order to eliminate the underutilization of females in the Professionals job category, indicating the need to increase this job category by 4 female employees. The availability percentage utilized in the previous Affirmative Action Plan reflected 52.2% females in this job group. RFTA has and will continue to recruit and hire qualified females into Professionals positions.

Goal 2 – Service & Maintenance – Underutilization of Females

Based on the EEO Tabulation 2006-2010 (5-year ACS data) data for the Roaring Fork Valley, the current representation of females is less than the availability of female Service & Maintenance workers in the relevant labor market. Specifically females comprise only 17.6% while the relevant labor market indicates females hold 24.7% of the Service & Maintenance job group in the Roaring Fork Valley. RFTA has set a goal of 7.1% in order to eliminate the underutilization of females in the Service & Maintenance job category, indicating the need to increase this job category by 21 female employees. The availability percentage utilized in the previous Affirmative Action Plan reflected 23.3% females in this job group. RFTA has and will continue to recruit and hire qualified females into Service & Maintenance positions.

Goal 3 – Skilled Craft – Underutilization of Minorities

Based on the EEO Tabulation 2006-2010 (5-year ACS data) data for the Roaring Fork Valley, the current representation of minorities is less than the availability of minority Service & Maintenance workers in the relevant labor market. Specifically minorities comprise only 19.1% while the relevant labor market indicates minorities hold 22.3% of the Service & Maintenance job group in the Roaring Fork Valley. RFTA has set a goal of 22.3% in order to eliminate the underutilization of minorities in the Service & Maintenance job category, indicating the need to increase this job category by 1 minority employee. The availability percentage utilized in the previous Affirmative Action Plan reflected 20.8% minorities in this job group. RFTA has and will continue to recruit and hire qualified minorities into Service & Maintenance positions.

Goal 4 – Service & Maintenance – Underutilization of Minorities

Based on the EEO Tabulation 2006-2010 (5-year ACS data) data for the Roaring Fork Valley, the current representation of minorities is less than the availability of minority Service & Maintenance workers in the relevant labor market. Specifically minorities comprise only 20.2% of the Service & Maintenance job category while the relevant labor market indicates minorities hold 33.1% of this job group in the Roaring Fork Valley. RFTA has set a goal of 12.9% in order to eliminate the underutilization of minorities in the

Service & Maintenance job category, indicating the need to increase this job category by 39 minority employees. In the previous Affirmative Action Plan RFTA stated that no employees were utilized in the Service Workers job classification. In preparing this Affirmative Action Plan, RFTA has returned to using the EEO categories as the job groups and has realigned positions accordingly. RFTA has and will continue to recruit and hire qualified minorities into Service & Maintenance positions.

TIMETABLES FOR PROGRESS TOWARDS PLACEMENT GOALS

Based on the comparative analysis between the female representation in the **Professionals** and **Service & Maintenance** job groups a significant number of female employees need to be added to RFTA's workforce to meet the established placement goals. RFTA, along with many other entities in the industry, recognized that enticing females into some of the traditionally-male jobs and positions required an approach different than for other job groups. As will be cited in the assessment of employment practices, females are significantly under-represented in the applicant pools for **Skilled Craft** positions, only 1 of 12 applicants comprising only 8.3% of those applicants.

The underutilization of females were identified in the EEO Job Categories of **Professionals** and **Service & Maintenance**. There were no identified underutilization of females in the EEO Job Categories of **Officials & Administrators, Administrative Support,** or **Skilled Craft**, therefore no goals or timelines were developed for these categories.

Within the **Professionals** job group there is underutilization based on comparison with the availability of females in the relevant labor market. Specifically, the relevant labor market data reflects that females hold 36.0% of Professionals positions in the relevant labor market. Therefore, efforts will be made to increase representation in RFTA's workforce from 21.2% of Professionals to parity with the relevant labor market as represented in the EEO Tabulation 2006-2010 (5-year ACS data) data for the Roaring Fork Valley area.

Within the **Service & Maintenance** job group there is underutilization based on comparison with the availability of females in the relevant labor market. Specifically, the relevant labor market data reflects that females hold 24.7% of Service & Maintenance positions in the relevant labor market. Therefore, efforts will be made to increase representation in RFTA's workforce from 17.6% of Service & Maintenance to parity with the relevant labor market as represented in the EEO Tabulation 2006-2010 (5-year ACS data) data for the Roaring Fork Valley area.

Underutilization of Females

- The EEO/AAP Officer and Human Resources Department will review internal human resources policies, processes, and operations to eliminate discrimination and to effectively attract qualified Affirmative Action candidates.
- Monitor existing career development opportunities (e.g., who is being chosen for non-routine assignments, acting assignments, special projects, rotational opportunities, training, and conference participation) to ensure that gender or cultural bias is not a factor in participation rates.
- Monitor RFTA-wide numbers and trends regarding formal internal complaints and external EEO charges.
- The EEO/AAO Officer and Human Resources, also plan to engage existing employees, the Amalgamated Transit Union Local 1774, external organizations, institutions of higher learning, and management personnel to work collaboratively to address underrepresentation of females and various minority groups in its workforce.

Underutilization of Hispanics

Within the **Service & Maintenance** job group there is underutilization based on comparison with the availability of this minority group in the relevant labor market. Specifically, the relevant labor market data

reflects that Hispanics hold 33.1% of Service & Maintenance positions in the relevant labor market. Therefore, efforts will be made to increase representation in RFTA's workforce from 20.2% of Service & Maintenance to parity with the relevant labor market as represented in the EEO Tabulation 2006-2010 (5-year ACS data) data for the Roaring Fork Valley area.

Within the **Skilled Craft** job group there is underutilization based on comparison with the availability of this minority group in the relevant labor market. Specifically, the relevant labor market data reflects that Hispanics hold 22.4% of Skilled Craft positions in the relevant labor market. Therefore, efforts will be made to increase representation in RFTA's workforce from 19.1% of Skilled Craft to parity with the relevant labor market as represented in the EEO Tabulation 2006-2010 (5-year ACS data) data for the Roaring Fork Valley area.

The underutilization of minorities was identified in the EEO Job Categories of **Skilled Craft** and **Service & Maintenance**. There were no identified underutilization of minorities in the EEO Job Categories of **Officials & Administrators, Professionals, or Administrative Support**, therefore no goals or timelines were developed for these categories.

The underutilization of females and minorities warrants continued Affirmative Action in recruitment efforts to obtain qualified applicants. RFTA plans the following actions to assist with achievement of the Affirmative Action goals identified above:

1) EEO/AAP Officer will provide RFTA hiring managers with information on EEO Job Categories in which underutilizations of females and minorities exist.
2) Evaluate those actions RFTA has taken in the past to improve underutilization of females and minorities and then assess why those actions, if any and as applicable, have not produced the improved utilization RFTA seeks.
3) Ensure that future job advertisements are worded so as to encourage a diverse pool of applicants.
4) Review current job descriptions and required qualifications for all positions that are to be recruited to ensure that only the appropriate requirements for the position are demanded of candidates so that there are no artificial barriers to attracting a diverse pool of candidates.
5) Encourage all current RFTA employees to refer qualified applicants.
6) Whenever possible promote qualified employees from within RFTA.
7) Use professional networking events as recruitment opportunities.
8) Utilize focused advertising to target underutilized populations.
9) Implement these actions given applicable local, state, and federal requirements, the demographics of RFTA's relevant labor market, and other reasonable concerns, some of which are listed below:
    a) Criteria/requirements specifically set forth by the Colorado Department of Transportation (CDOT) relevant to various RFTA positions;
    b) Criteria/requirements specifically set forth by the U.S. Department of Transportation (USDOT) relevant to various RFTA positions;
    c) The often intense competition for labor in the Roaring Fork Valley, influenced in part, but certainly not limited to, the increasing number of employers entering the valley and competing for the same labor force as RFTA;

d) The total compensation and benefits package that RFTA is fiscally and reasonably able to offer its employees ***versus*** those employment packages employers in the Roaring Fork Valley are able to offer the same available labor force.

Improved Targeted Recruitment

RFTA will undertake actions to strengthen relationships with associations and organizations representing underutilized groups as their constituencies, through more direct contact with RFTA. RFTA will also distribute more material and communications for the Hispanic and Asian communities, to encourage those individuals to apply for and potentially be hired into a variety of positions within RFTA. RFTA will continue to develop additional outreach initiatives to better include individuals belonging to identified underutilized groups.

Internal Management Initiatives

- Encourage leadership to create an environment of inclusion, which values differences.
- Ensure that candidates for executive, director, manager, or supervisor positions have certain leadership competencies which include "Cultural Awareness." Hiring officials are accountable for ensuring that the candidates provide examples which demonstrate possession of such competencies.
- Build accountability for hiring, retaining, and developing a diverse, high-quality workforce into the annual performance reviews for executives, directors, managers, and supervisors.
- Retain a wider pool of talent by implementing formal and informal mentoring programs, diversity roundtables and encourage network and support groups.

Human Resources Initiatives

- Attract a wider pool of talent by expanding recruiting efforts to specifically target audiences through a wider area range and selected professional affiliation groups.
- Identify sources of outreach for Affirmative Action group members. Learn where the candidates go to find job information – making sure that RFTA's message of it being an Equal Employment Opportunity employer is visible. Consider using a variety of common job search locations such as: minority or women student associations, including associations for students with disabilities; professional organizations with the focus on Affirmative Action group members; professional minority organizations; community newsletters, minority newspapers and periodicals; minority or women organizations, such as NAACP and Centro Hispano; minority conventions and conferences; minority job fairs and libraries, especially those in racial/ethnic communities.
- Ensure that recruiters and selection panels work closely with Human Resources and the EEO Officer during the recruitment process.
- Widely publicize development opportunities for employees, such as detail assignments and leadership training, to give everyone interested a chance to participate in assignments that prepare them for higher-level positions.

Education and Outreach to Internal Stakeholders

- RFTA will widely disseminate the Affirmative Action Plan goals throughout RFTA, and encourage managers to conduct targeted recruitment in support of these goals.

- RFTA will provide detailed information and training to hiring managers and those involved in the hiring process regarding the Affirmative Action goals and efforts to meet those goals. The EEO Officer will focus on broadening the understanding of all management personnel on the importance of a diverse and inclusive workforce through continued training and engagement.
- Training managers and supervisors in their EEO/AA responsibilities as well as educating them with the existing personnel and administrative tools to help them carry out their responsibilities in these areas. Educational opportunities are being prepared to inform hiring managers on how to best utilize and make progress towards established goals.
- The EEO Officer will engage with Human Resources personnel, specifically recruiting staff for information and resource sharing. Specifically, sourcing with organizations and entities serving and representing the under-utilized groups to increase the representation of those groups in the application pools for upcoming vacancies.
- Information will be provided to aid recruiters in ensuring applicants are effectively screened, full opportunities are provided for applicants to divulge full and accurate information so as to be screened properly and move through the competitive processes to hiring or promotion.
- RFTA will engage with the labor union to educate its management on the Affirmative Action Plan, the areas of under-utilization, especially those jobs or positions which it represents. It is anticipated that collaborative efforts between RFTA and the union will provide additional access to underutilized jobs or positions in order to increase representation, especially of females, in conformity with the established placement goals.
- The EEO Officer will review internal Human Resources policies, processes, and operations to eliminate discrimination and to effectively attract qualified Affirmative Action candidates.

MONITORING AND REPORTING

Monitoring Procedures

The EEO/AAP Officer meets with the Chief Executive Officer semi-annually to provide notification of discrimination complaints, potential employment decisions that may negatively impact females and minorities and recommendations taken to address these issues.

By monitoring employment data and complaints of discrimination, the EEO/AAP Officer can determine whether RFTA's policies of nondiscrimination and Affirmative Action are being carried out and the degree to which RFTA is attaining its goals.

If this internal audit reveals that the performance of a department is unsatisfactory, the EEO/AAP Officer will work with Human Resources and the appropriate Senior Staff to achieve satisfactory corrective action. If this should not be effective, the EEO/AAP Officer will submit corrective recommendations to the Chief Executive Officer.

Procedures

Any person, employee, former employee or applicant for employment, who believes discrimination occurred on the basis of race, color, religion, national origin, sex (including pregnancy, childbirth, or related medical conditions; gender identity; and sexual orientation), age (40 years and older), genetic information, disability, veteran status, retaliation, or any other applicable status protected by federal, state or local law, may file a complaint.

Discrimination includes lack of access, harassment, retaliation, and disparate impacts from a program or activity. Harassment includes a wide range of abusive and humiliating verbal or physical behaviors. Retaliation includes intimidating, threatening, coercing, or engaging in other discriminatory conduct against anyone because they have filed a complaint or participated in a discrimination investigation.

Employees who feel they have been discriminated or retaliated against should, if possible, attempt to resolve the complaint at the lowest level of supervision. If this approach is not probable or is ineffective, a complaint may be filed with RFTA's EEO/AAP Officer or, subsequently, with RFTA's CEO. A formal complaint that involves an allegation against the CEO shall be reported to RFTA's General Counsel.

RFTA employees and applicants for employment are expected to report allegations of discrimination and harassment without fear of retaliation. Any allegations of retaliation will be investigated and violations are subject to disciplinary action including, but not limited to, termination.

While not required, complainants are encouraged to use RFTA's EEO Complaint Form **(see Exhibits 6 & 7)** which can be found at www.rfta.com or by request through the Regulatory Compliance/EEO Officer. Complaints must be filed in writing and signed within **180 days** of the alleged discrimination, unless the time for filing is extended (49 CFR 21.11 and 27.123). Complaints must be legible and contain the details of the alleged complaint. Every effort will be made to obtain early resolution of complaints at the lowest level possible. Communications of this nature, will be treated as private and confidential.

Upon receipt of a completed complaint, the EEO/AAP Officer will determine completeness of the form or the need for additional information, within five (5) working days, and acknowledge receipt of the complaint and the intended course of action through certified mail.

RFTA's EEO/AAP Officer (CEO or designee, if a conflict of interest exists) will conduct a comprehensive and timely investigation of all complaints. Complaint investigation findings will be formally presented to the CEO within 10 working days, of receipt of the complaint (excluding Saturdays, Sundays and Holidays). The EEO/AAP Officer will be assisted in her investigation by the Director of Human Resources.

If a complainant is not satisfied with the investigative findings from the EEO/AAP Officer, the complainant has five (5) working days following the "Receipt of Findings" from the EEO/AAP Officer, to prepare and present a written response, which will serve as an official appeal to the CEO, that a reevaluation of his/her complaint be conducted. Within ten (10) working days of receipt of appeal, the CEO will review the original investigative findings, conduct further investigations, and formally present his findings and ruling on the appeal to the complainant.

All complaints alleging discrimination against RFTA, along with the resolution to the complaint or corrective action plan, are forwarded to the Federal Transit Administration Region 8 Civil Rights Officer in Denver, Colorado. RFTA maintains a confidential log of all accepted and forwarded EEO/AAP complaints which include:

- Name of complainant;
- Date complaint was received;
- Date of the allegation;
- Description of alleged discrimination;
- Report date;
- Recommendations;
- Outcome/Resolution;
- Other relevant information.

All allegations of discrimination will be taken seriously and every effort will be made to provide a fair and unbiased determination. In instances where there is dissatisfaction with RFTA's determination, the complainant may file a complaint directly with:

- Equal Employment Opportunity Commission (EEOC)
  131 M Street, NE
  Washington, DC 20507
  (202) 663-4900 / (TTY) (202) 663-4494
  Website: www.eeoc.gov

- Civil Rights Division of the State of Colorado Department of Regulatory Agencies
  1560 Broadway, Ste. 110
  Denver, CO 80202
  (303) 894-2997 / (Español) (920) 432-4294
  Email: dora_ccrd@state.co.us

Employees have the option to resolve incidents themselves, in consultation with their director, manager or supervisor, after approval by the EEO/AAP Officer. Employees may utilize this option, only after all relevant parties agree that the incident is a result of a mix-up or misunderstanding. Resolutions between employee and the accused violator, may include referrals to the RFTA Employee Assistance Program (EAP) or appropriate disciplinary actions, as warranted. RFTA reserves the right to formally investigate any report of harassment that threatens the integrity of the workplace and to take appropriate disciplinary actions.

RFTA's actions taken with regard to allegations of harassment in violation of RFTA's EEO Policy will be based upon detailed case findings. Employees are subject to disciplinary actions including, but not limited to, termination, for violating the EEO Policy.

Timeline for EEO Complaints

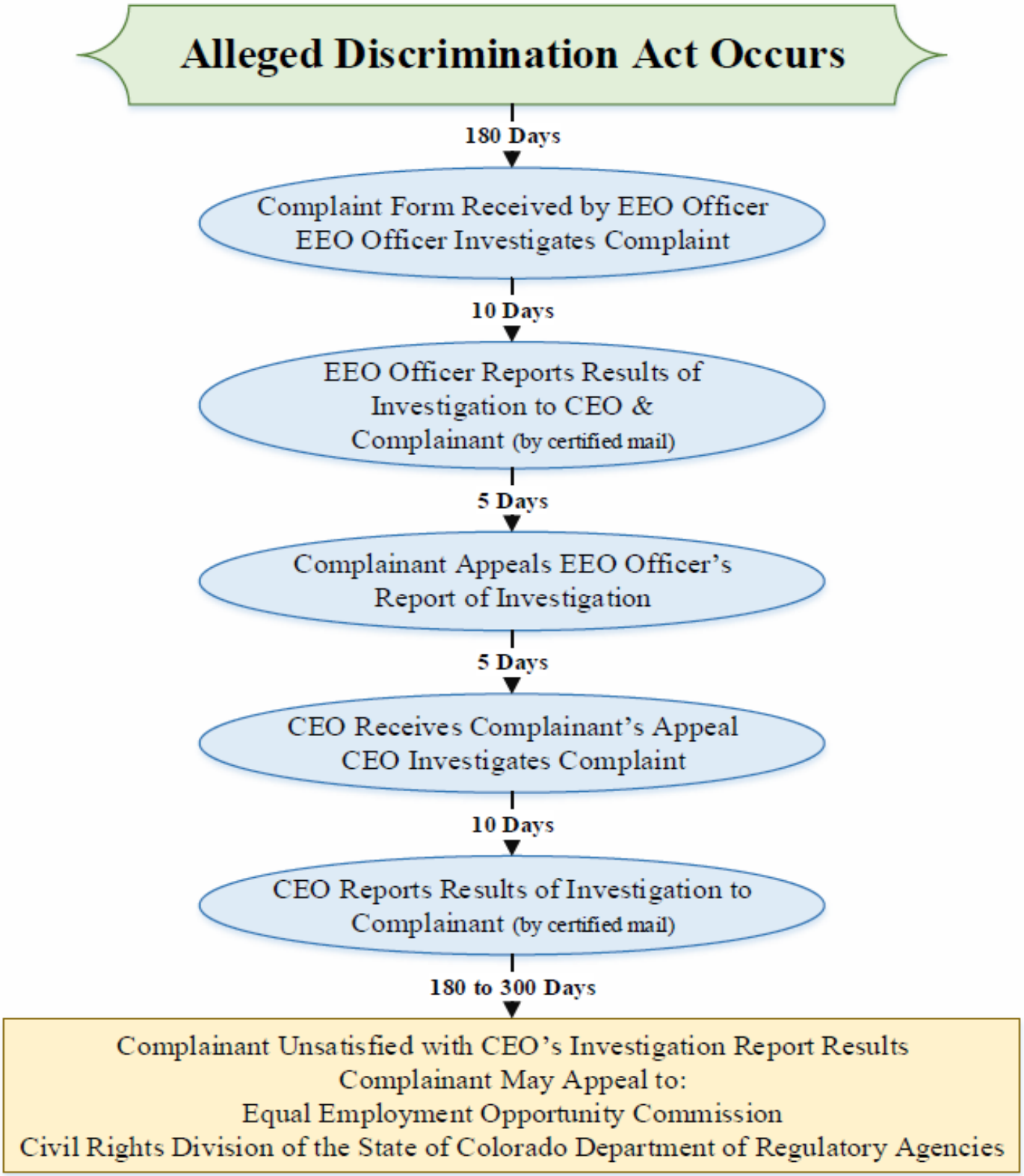


Figure 18. Timeline for EEO Complaints

RFTA will make reasonable efforts to assist persons with disabilities, non-English speakers, and others unable to file a written complaint, upon request. For assistance in filing a complaint, contact the EEO/AAP Officer at (970) 384-4974. The officer will obtain the complaint information, complete the form, and forward the completed form to the complainant for review, signature, and return of signed form.

For questions or information on how to file a complaint, please contact RFTA's EEO/AAP Officer:

Nicole Schoon, EEO/AAP Officer
2307 Wulfsohn Road
Glenwood Springs, CO 81601
Email: nschoon@rfta.com
Phone: (970) 384-4974

DISCRIMINATION COMPLAINTS

In 2016, RFTA received and closed two (2) complaints of alleged discrimination, both complaints filed alleged discrimination based on disability, under the Americans with Disabilities Act (ADA) and the Colorado Anti-Discrimination Act (CADA).

- On August 12, 2016 the Roaring Fork Transportation Authority (RFTA) received notification that an individual had filed a complaint/charge of alleged discrimination with the Colorado Civil Rights Division. The allegation stated that the complainant was subjected to discriminatory terms and conditions of employment and discharged based on his disability. The complainant suffered an injury while performing his normal work duties and was placed on Family Medical Leave Act (FMLA) leave. The complainant was not allowed to work until released by a doctor and had undergone a fitness for duty exam. The complainant requested that "reasonable accommodations" be made until he recovered from his injury.

  RFTA responded to the allegations stating that, based on his medical records, the complainant was unable to perform any duty, given the severity of the injury. RFTA makes reasonable accommodations based on the restrictions and recommendations from the employee's physician, in the context of the job description requirements. Based on the recommendations of the complainant's treating physician, he was not qualified to perform any position at RFTA. RFTA considered and exhausted all efforts to allow for reasonable accommodations.

  On April 5, 2016, the Colorado Civil Rights Division notified RFTA that a "Right to Sue" was granted to the claimant and actions against RFTA were being terminated. No further action has been taken by the complainant.

- On December 29, 2016 the Roaring Fork Transportation Authority (RFTA) received notification that an individual had filed a complaint/charge of alleged discrimination with the Colorado Civil Rights Division. The allegation stated that this individual was subjected to discriminatory terms and conditions of employment and discharged based on his disability. The complainant stated that he called out of work as he was suffering a relapse from his disability and requested a suspension, instead of termination, as an accommodation to his disability. RFTA denied the allegations of discrimination and stated that the complainant was discharged for violating its Sick Leave Policy. RFTA's Sick Leave Policy in part reads:

  > "Sick leave may be used when an employee is incapacitated by illness or injury, or for medical, dental, health or optical examinations or treatment. False reporting of sick leave is considered a gross misconduct. Employees who falsely claim they are ill or injured in order to get sick leave, or to avoid assigned work, or in order to be off work, or to extend already approved vacation leave will be subject to disciplinary action, up to, and including suspension or termination."

  On September 5, 2017, the Colorado Civil Rights Division determined that there was insufficient evidence to support the complainant's claim of discrimination. As such, a No Probable Cause determination was issued.

FY' 2018-2021 GOALS AND TIMETABLES

RFTA has been utilizing the EEO-1 Job Categories in creating and establishing goals and timetables. In 2017 RFTA began utilizing the EEO-4 Job Categories as required by the FTA Circular 4704.1A. Current RFTA Job Titles were cross-referenced to the EEO-4 Job Categories, resulting in changes in the workforce statistics. Since the 2014 update there have been some improvements in the underutilization of females in the **Officials and Administrators, Technicians, Administrative Support, Skilled Craft,** and **Service & Maintenance** EEO job categories. Improvements have also been made in the underutilization of minorities in the **Technicians, Administrative Support,** and **Service & Maintenance** EEO job categories. Areas that already meet the requirements, have been given a 0.0% projected goal. RFTA has established the following goals for FY' 2018-2021:

EEO Job Category	Rate of Addition		1 Year Goal		2 Year Goal		3 Year Goal		4 Year Goal	
	Minority	**Female**	**Minority**	**Female**	**Minority**	**Female**	**Minority**	**Female**	**Minority**	**Female**
Officials & Administrators	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Professionals	0.0%	**14.8%**	0.0%	**3.0%**	0.0%	**3.6%**	0.0%	**4.1%**	0.0%	**4.1%**
Administrative Support	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Skilled Craft	**3.2%**	0.0%	**0.5%**	0.0%	**0.7%**	0.0%	**1.0%**	0.0%	**1.0%**	0.0%
Service & Maintenance	**12.9%**	**7.1%**	**2.5%**	**1.0%**	**3.0%**	**1.5%**	**3.5%**	**2.0%**	**3.9%**	**2.6%**

Table 12. 2018-2021 Goals & Timetables

EMPLOYMENT PRACTICES AND PROCEDURES

An assessment of employment practices was conducted in order to ensure that RFTA's commitment to Equal Employment Opportunity and Affirmative Action is being fully implemented and to identify the extent to which problems may arise and/or exist. RFTA's key employment related practices are synopsized below.

Recruitment Plan

RFTA faces significant challenges to retain business and institutional knowledge and expertise within its ranks while at the same time recruiting new employees with diverse experiences and backgrounds that will enable RFTA to be a vibrant successful employer of choice. RFTA has and will continue to actively employ a multifaceted approach to recruit talent, including from protected groups for positions where under-utilization has been identified. Recruiting of individuals with disabilities will also be emphasized. Recruitment for RFTA positions is the responsibility of every director, manager and supervisor who has authority to make hiring decisions. The Department of Human Resources and the EEO Officer will partner with directors, managers, and supervisors establishing recruitment contact relationships within diverse communities, and providing technical support as needed. The recruitment plan will be paired with the retention plan to form a seamless and comprehensive workforce strategy.

RFTA will take a multi-faceted approach to actively recruit protected group members for positions within RFTA. Recruitment of individuals with disabilities will be emphasized. RFTA will engage in mutually beneficial partnerships with community organizations designed to provide employment services to people with disabilities as a part of our recruitment efforts.

Internal Recruitment Activities

RFTA employees will continue to be informed of internal positions in a variety of ways, including:

- Posting on bulletin boards in various work areas;
- Posting at all RFTA maintenance facilities;
- Email notices to all RFTA employees;
- Posting on RFTA's website.

Position announcements will be distributed via the internet, to various and diverse local, regional and community media publications, community groups, and by way of personal contacts in order to ensure receipt by widest possible audience. RFTA will periodically review these recruitment efforts to determine the level of success.

Recruiting Efforts

- Recruiting sources are informed of RFTA's policy of nondiscrimination and affirmative action.
- Personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related employment processes are trained to enhance awareness of our commitments.
- RFTA recruits applicants for employment on the basis of their demonstrated ability and competence and without regard to the applicant's physical or mental disability where that disability does not interfere with the applicant's ability to perform the job.

- RFTA seeks to create opportunities to increase outreach to disabled individuals by offering non-safety sensitive positions with duties that can be performed by individuals with disabilities, with reasonable accommodations.

Recruitment Outreach

The Department of Human Resources along with the EEO Officer will continue to inform collaborative partners and the general community regarding employment opportunities with RFTA. Employment opportunity information will be provided via RFTA's internet website https://www.rfta.com/employment/.

RFTA will provide information to all individuals interested in working for RFTA to educate them of RFTA's career opportunities as these requests occur. This information will also be made available to current temporary and contract staff that want to learn how to gain access to permanent employment with RFTA.

RFTA will continue to enhance its partnership with directors, managers, and supervisors through education regarding recruitment strategies, providing them access to multi-cultural resources, and by encouraging them to participate in various internal and external department recruitment and outreach efforts.

Advertising

In addition to advertising specific vacancies in community newspapers, the Human Resources Department will utilize electronic media, and posting job opportunities with job centers, transit brochures, and various websites. RFTA utilizes the following to advertise its vacancies:

- American Public Transportation Association (APTA);
- Aspen Daily News;
- Aspen Times;
- Colorado Association of Transit Agencies (www.coloradotransit.com);
- Colorado Government Finance Officers Associations (www.cgfoa.org);
- Colorado Job Service Center;
- Colorado Society of CPA's (www.cocpa.org);
- Connecting Colorado (website);
- Coolworks.com;
- Facebook;
- Glenwood Post-Independent;
- Grand Junction Sentinel;
- In-Bus Advertising;
- Indeed.com;
- Instagram;
- KSPN Radio;
- Local Radio Stations;
- Local Spanish (language newspaper(s));
- Mass Transit (website);
- Non-Local Newspapers (Summit County, Vail, Eagle County, and Steamboat);

- Passenger Transport;
- RFTA Website (www.rfta.com/employment);
- Transit Intelligence (website);
- Transit Talent (website).

Visibility
RFTA, the Human Resources Department, the EEO Officer, and other RFTA program staff will continue to partner in representing RFTA at community events.

Relationships
RFTA will strengthen its current relationships with community partners (serving people with disabilities, people of minority groups, and women) as well as develop new ones. These relationships will be cultivated through:

- In-service learning opportunities for RFTA staff;
- Immersion experiences in the Community;
- Partnership with a wide variety of community organizations and programs including:
  - Aspen Chamber/Resort Association;
  - Carbondale Chamber of Commerce;
  - Glenwood Chamber/Resort Association;
  - Jazz Aspen-Snowmass (event);
  - Music Associates of Aspen (Aspen Music Festival and School);
  - Snowmass Resort Association;
  - Disabled Veterans Sports Clinic;
  - The Traveler Program (free transportation for elderly and disabled in Garfield County);
  - Pitkin County Senior Van (free transportation for elderly and disabled in Pitkin County);
  - Winter X Games (Aspen winter sports competition, broadcast on ESPN);
  - Independence Pass Foundation (fund-raiser to rehabilitate eroding river banks, trails, wilderness areas, etc. on Independence Pass);
  - Passage to Freedom (advocates rights for physically disabled individuals in the Roaring Fork Valley);
  - U.S. Forest Service (sightseeing tours of Maroon Bells in Pitkin County);
  - Emergency Evacuation Provider (RFTA assists the evacuation of Roaring Fork Valley citizens and tourists during natural disasters, such as fires, floods, blizzards, etc.).

Implementation of efforts to reduce "avoidable" turnover:
Avoidable turnover includes voluntary resignation of positions. RFTA will also review non-certifications (employees who do not pass the designated probation period). RFTA will continue its efforts to reduce avoidable turnover. The efforts will be based on analysis, which includes but is not limited to:

- Employee Orientation;
- Employee Surveys;
- Performance Management;
- Conflict Intervention;
- Employee Recognition; and

- Professional Development.

Work Environment Improvement
Employers who provide a safe environment where employees are free to share their ideas and opinions are more likely to retain diverse talent. RFTA is committed to workforce development and open communication, and the EEO Officer and Human Resources will partner with departments to accomplish these aims. RFTA will work to implement methods to gather feedback from its employees.

Performance Management
When employees are clear about their expectations, have constructive feedback on an on-going basis and work with their supervisors to construct an individual development plan, they are less likely to leave an organization.

The Human Resources Department provides information to managers, and works towards a goal of assisting and encouraging directors, managers, supervisors, and administrators in the completion of performance review and individual development plans of all RFTA staff during the time period of this Plan. Upon request the Human Resources Department and the EEO Officer will be available to work with directors, managers, and supervisors to identify barriers employees have in meeting performance expectations and work on initiatives that will produce measurable results.

Goals and Timetables
Goals and timetables are depicted in the utilization analysis section of this Affirmative Action Plan. RFTA makes every ***good faith effort*** to recruit qualified minorities and women not presently in the workforce in order to meet hiring goals established through the utilization analysis.

Retention Plan
RFTA will strive to affirmatively ensure Equal Employment Opportunity to retaining a diverse composite of talented and qualified employees, with emphasis on under-represented individuals. The responsibility of these retention efforts to be successful lies with all employees. RFTA's retention strategy is a multi-faceted approach, guided by the EEO Officer, Human Resources, and RFTA management.

Through experience, RFTA has found that the best way to retain valuable employees is to provide them with a variety of mechanisms to feel supported within the workplace. RFTA's primary focus will be: to anticipate future needs for talent, cultivate employee's knowledge, skills, and abilities in order to prepare them for advancement opportunities, and to continuously enhance all RFTA efforts so that employees view RFTA as a preferred place in which to work.

To improve the rate of retention of talented employees, RFTA will continue with current efforts and integrate new approaches. These efforts will consist of:

- Conducting analyses of RFTA turnover;
- Advising RFTA leadership and management of trends and solutions;
- Implementation of efforts to reduce turnover in areas identified through analysis;
- Implementation of efforts to create and promote employee development opportunities; and
- Encourage employees to seek out career development opportunities.

New Hires

Data regarding new hires reflects 120 new employees were hired during the plan period. The breakdown of new hires by gender and race are shown in the two tables below.

Job Categories			Females			
	White	AI/AN	Black	Asian	Hispanic	**Total**
Professionals	1					**1**
Administrative Support	4					**4**
Skilled Craft	1					**1**
Service & Maintenance	17	1	4	1	4	**26**
Grand Total	**23**	**1**	**4**	**1**	**4**	**33**

Table 13. Female New Hires

Job Categories					Males		
	White	AI/AN	Black	Asian	Other	Hispanic	**Total**
Professionals	1						**1**
Skilled Craft	6						**6**
Service & Maintenance	61	1	3	1	1	13	**80**
Grand Total	**68**	**1**	**3**	**1**	**1**	**13**	**87**

Table 14. Male New Hires

The overall hire rate of females during the Plan period has been 27.5%

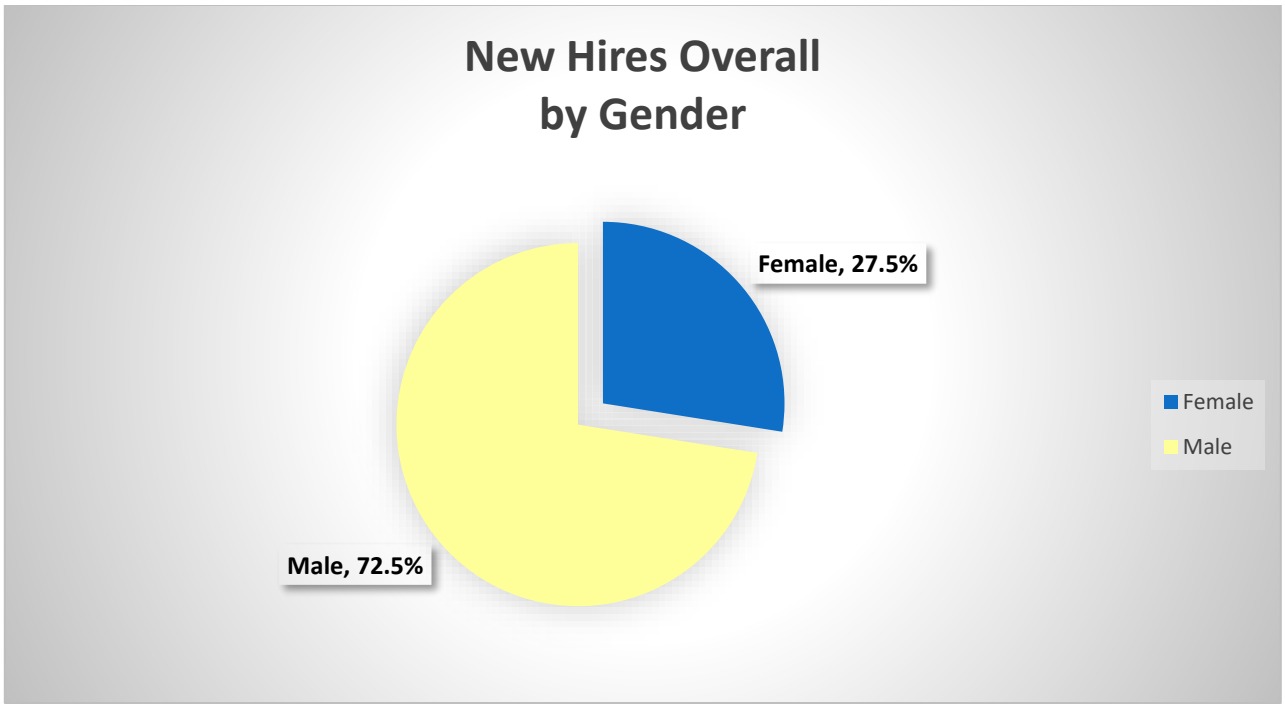


Figure 19. Overall New Hires

Given the underutilization of females in two (2) job groups, Professionals and Service & Maintenance, it should be noted for the Professionals and Service & Maintenance job groups females were hired at a percentage rate higher than the overall representation of females within RFTA. This evidences RFTA's commitment to solicit and recruit female applicants across all job groups.

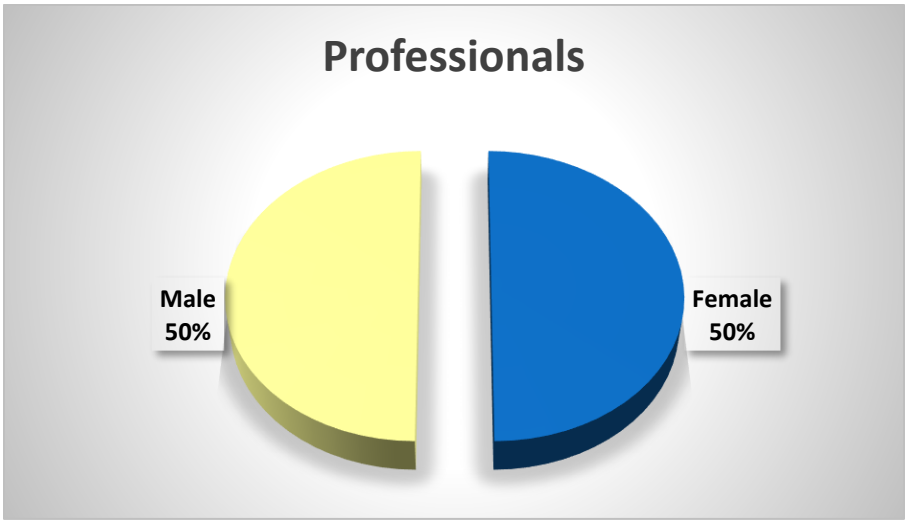


Figure 20. New Hires-Professionals

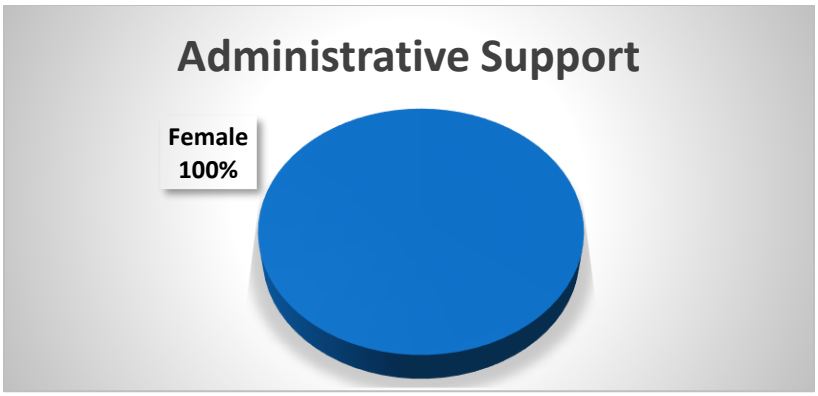


Figure 21. New Hires-Administrative Support

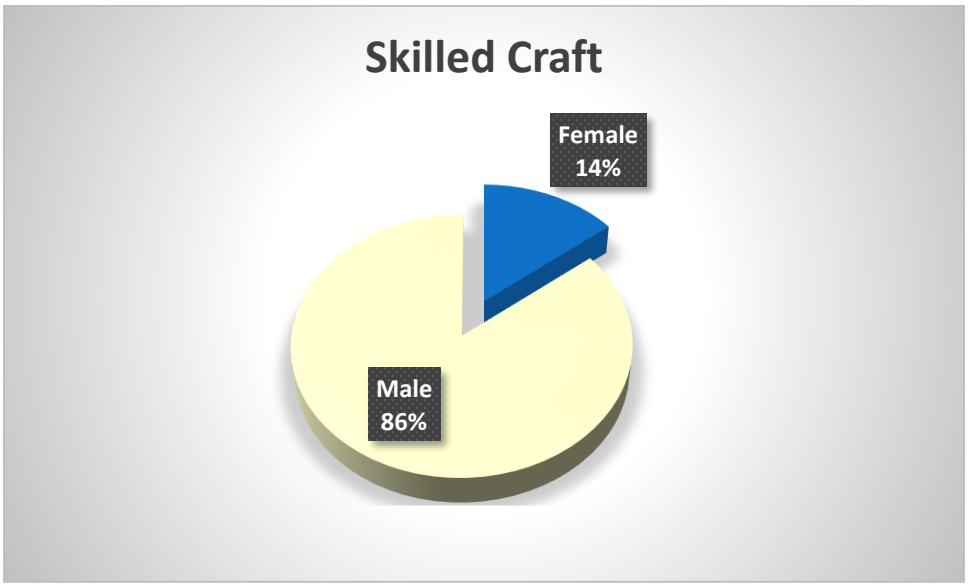


Figure 22. New Hires-Skilled Craft

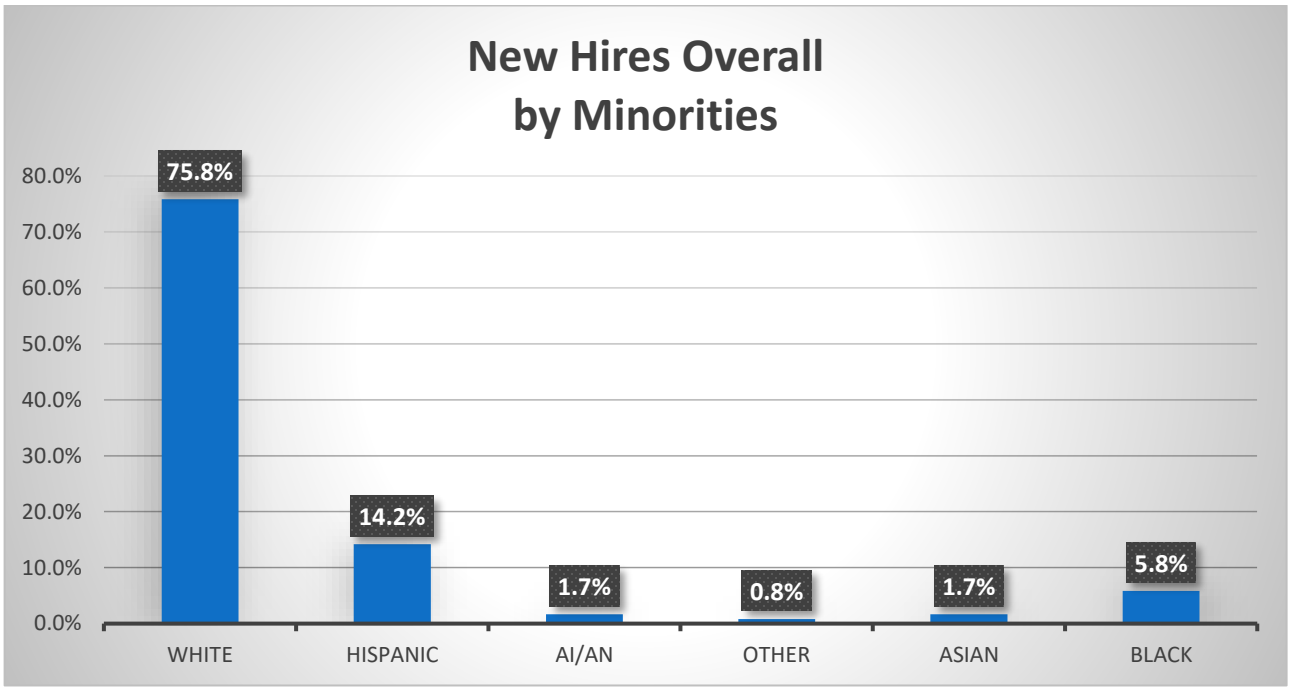


Figure 23. New Hires by Minority

The overall hire rate of minorities during the Plan period has been 24.2%.

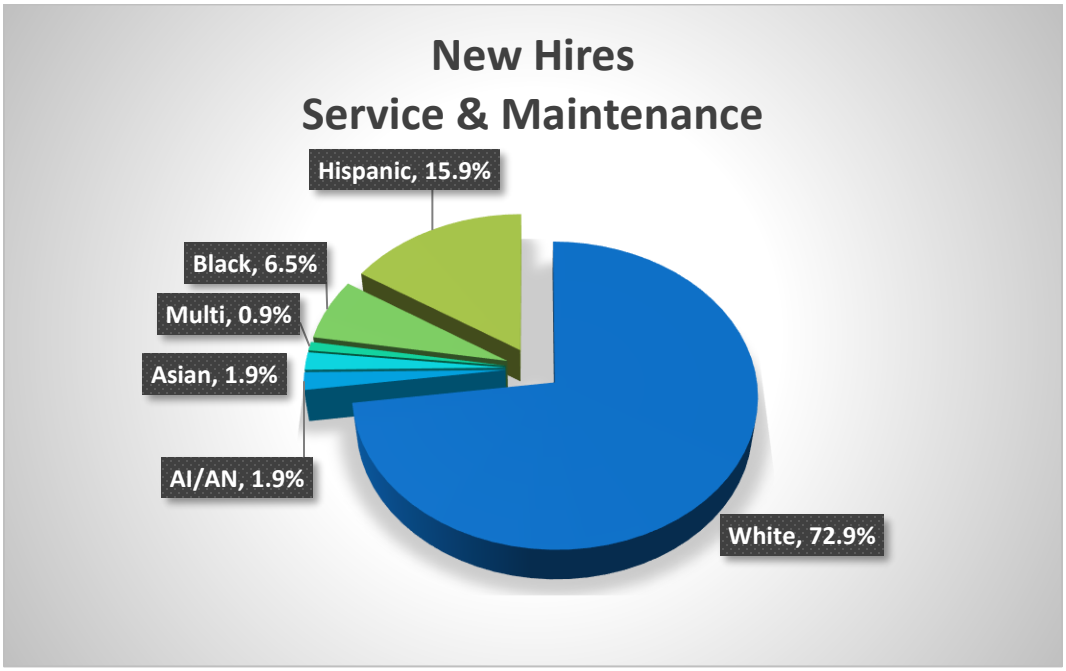


Figure 24. New Hires by Job Group-Race/Ethnicity

Terminations and Separations

During the Plan period 5 employees were involuntarily terminated from their position at RFTA. RFTA does not currently track the reason for termination/separation of employees, however a process is currently being reviewed to track this information.

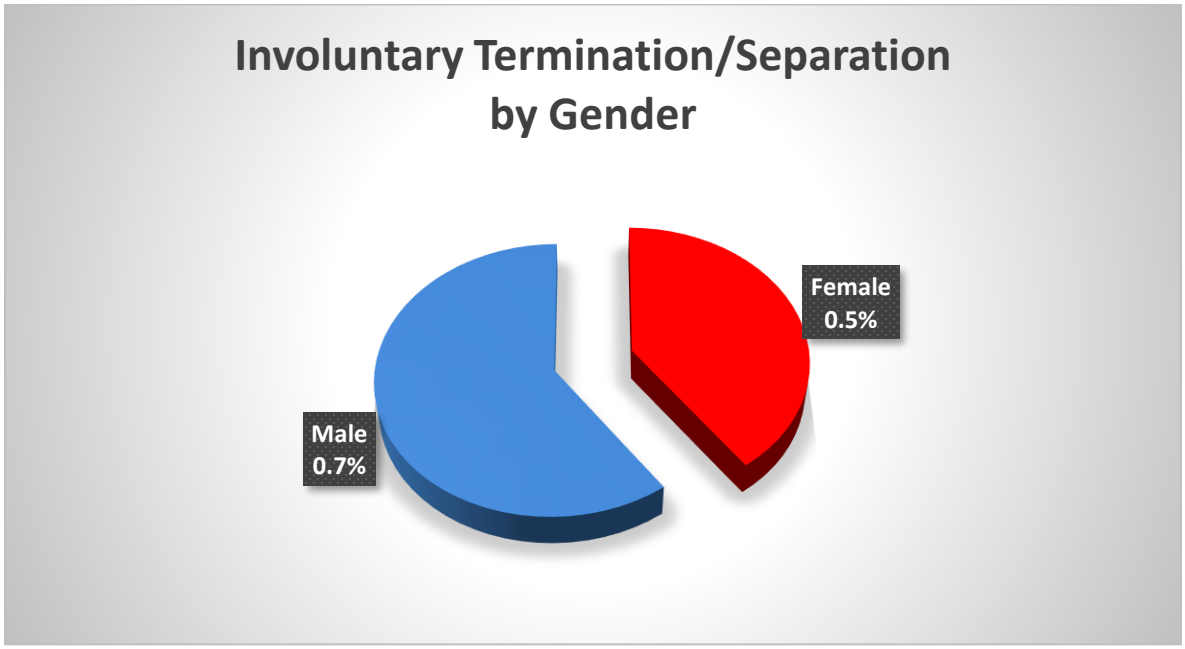


Figure 25. Termination/Separation by Gender

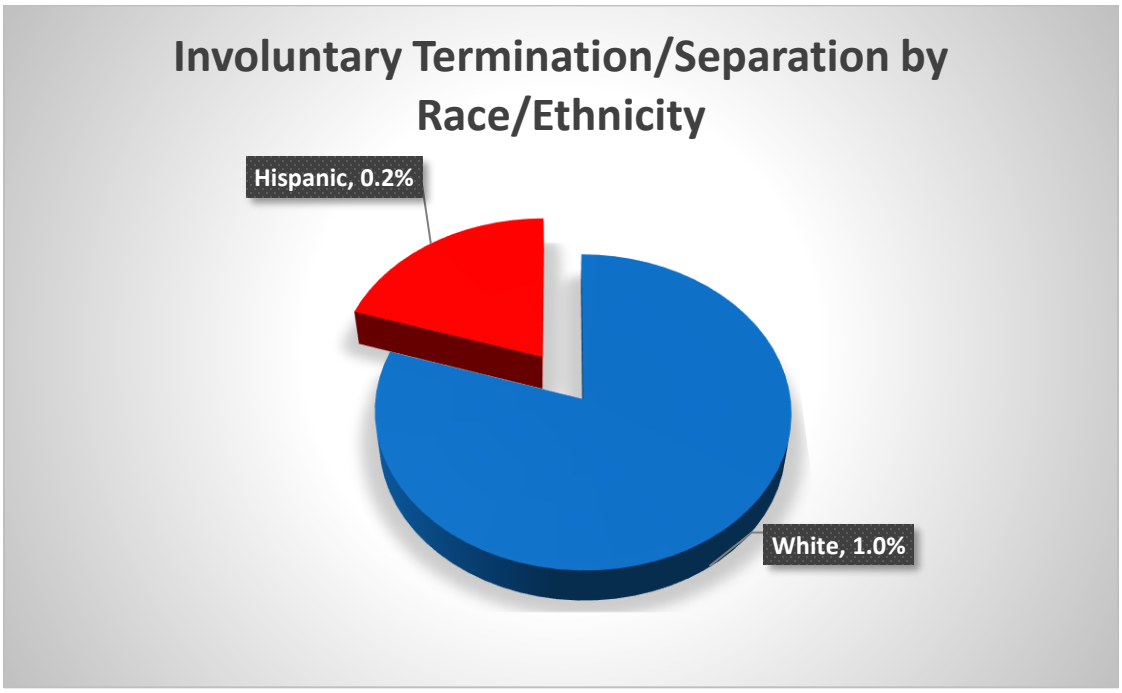


Figure 26. Termination/Separation-Race/Ethnicity

Training

A healthy and respectful work environment is essential for the recruitment of a highly qualified diverse candidate pool as well as for on-going good employee morale, retention, and productivity. As diversity grows within the RFTA workforce, the need for awareness and mutual respect also increases.

Workforce education is a continuous process with the threefold objective of improving the internal work environment, improving the inclusiveness of under-represented persons in RFTA's employment community, and improving customer service to our growing and diverse customer base.

Employee Orientation Efforts

RFTA continues to require new employees, including directors, managers and supervisors, to attend new employee orientation. This opportunity is currently organized by RFTA's Human Resources Department with collaboration from a number of departments. The New Employee Orientation Session is a full-day program that provides information about RFTA's resources (including EEO/AA, Title VI, LEP, ADA, and diversity). With limited training resources RFTA continues to provide in-house training opportunities to RFTA employees at all levels.

ASSESSMENT OF RFTA'S EMPLOYMENT PRACTICES

Recruitment

The composition of the employee population at RFTA is approximately 88% hourly and 12% salaried. The largest classification of work exists at the Bus Operator level. RFTA recruits Bus Operators on an ongoing and as needed basis by posting positions on the RFTA website (www.rfta.com) and by using various types of media that produce a diverse pool of applicants. RFTA generally hires 40-50 seasonal Bus Operators (temporary, full-time positions) each fall to drive during the winter ski season (approximately Thanksgiving to Easter), which is RFTA's busiest time of year. RFTA places employment ads in local newspapers and other print media as well as on local radio stations and with local employment agencies. In the past, during periods in which RFTA has had problems recruiting qualified Bus Operators (generally periods with a very strong economy and low unemployment), RFTA has sent recruiters to Alaska and Puerto Rico to recruit winter seasonal Bus Operators who may have had summer driving jobs in those locales but not winter driving jobs. In many instances, Bus Operators hired as winter seasonal drivers are promoted to permanent, full-time Bus Operator positions at the end of the winter season. The second largest classification of work at RFTA is Mechanics. While RFTA recruits qualified mechanics from the local workforce, it also heavily recruits from regional vocational and technical schools that offer automotive maintenance programs. Wyoming Technical College in Laramie, Wyoming, in particular, has proven to be a very successful recruitment base for RFTA Mechanics. Salaried employees are recruited in many of the same ways as hourly employees, but positions that require specialized skills are often recruited statewide and nationally as well as locally.

The RFTA employment application is available on the RFTA web site (www.rfta.com) and at RFTA's two Bus Operations and Maintenance Facilities in Aspen and Glenwood Springs, Colorado. RFTA accepts employment applications by walk-in; at facilities located in Aspen and Glenwood Springs, on-line, and by mail. Applicants for salaried positions are often allowed to initially submit resumes via e-mail in lieu of a RFTA employment application. RFTA offers applicants opportunities to express the need for the removal of barriers that constrict the availability to full access employment. Because of the nature of our work, we do not receive many requests for accommodations.

Selection

RFTA Department of Human Resources personnel screen applications based on the criteria cited in each job description and on every job vacancy notice. All applications that meet the qualifications for a particular vacancy are sent as a group to the hiring manager. The hiring manager is given the opportunity to look through all applications, not just those that are pre-screened. Whether selected for an interview or not, applicants are sent a notification of the receipt of their credentials.

Applicants who reach the interviewing phase of selection for a Bus Operator or Mechanic position must either possess a Commercial Driver's License (CDL) or be willing and able to obtain one. Bus Operator and Mechanic applicants, who do not pass a thorough background check through RFTA's outside vendor (including a Motor Vehicle Record) or meet the qualifications established by the United States Department of Transportation (USDOT), are not interviewed.

Applicants for Bus Operator positions are interviewed by an Operations Director, Manager or Supervisor or a combination thereof. Applicants for Mechanic positions are interviewed by one or more of RFTA's

Maintenance Foremen. Applicants are provided with information on benefits and work rules during the interview process. Once the interviewers decide who should be hired, the information is sent to the Department of Human Resources and the applicant is given a chain of custody form and sent to get the required pre-employment drug test. Once the drug test comes back with no findings and the background check (including a Motor Vehicle Record) conducted by RFTA's outside vendor reveals the same, the applicant is given a verbal employment offer by phone, followed by a written offer.

Recruitment and selection procedures for the salaried workforce are consistent with the procedures used for the hourly workforce except for a few differences. The major difference is that salaried applicants are generally not required to carry a CDL. The interview process is basically the same as well as the background check (including the Motor Vehicle Record); however, only safety-sensitive positions, as defined by the USDOT, are required to undergo a drug test. The Bus Operations and Maintenance Departments are the only two departments who employ safety-sensitive employees. The offer notification process is similar.

Decisions to hire are at the sole discretion of the Director or hiring manager of a specific department. The Bus Operations and Maintenance Departments at RFTA are the only two departments to regularly utilize hiring managers in lieu of hiring decisions being made by the department head (Director).

Promotions

Promotions within RFTA are driven by the Internal Job Placement policy. When a position becomes available for which there may be qualified internal applicants, RFTA will first post the position internally to current RFTA employees. If there are no qualified internal applicants, or an insufficient number of such, RFTA will then conduct an external recruitment of applicants. All qualified employees are invited to submit a RFTA Employment Application for posted vacancies. RFTA posts vacancies internally on bulletin boards and via e-mail and gives employees five (5) days to demonstrate an interest. Exceptions are made for employees who are sick or out on vacation during the posting period. The Internal Job Placement policy utilizes procedures similar to the ones designed for external recruitments. Employees who apply for another position within RFTA must go through an interview process.

Benefits

RFTA offers each full-time employee a full complement of health, welfare and retirement benefits including a non-contributory 401(A) retirement plan funded at 12.5% of the employee's base salary. The 401(A) retirement plan is an approved social security replacement plan. Employees are fully vested in the 401(A) retirement plan after five (5) years of service. RFTA also offers full-time employees a contributory 457 retirement plan; however, RFTA does not contribute to this plan.

Bilingual documents

RFTA makes every effort to ensure that bilingual written materials are available as requested. Written benefit materials have been and continue to be made available in Spanish and RFTA conducts several Benefits Open Enrollment sessions in Spanish each year. At the current time, the Human Resources Department has one bilingual, Spanish-speaking employee and a second Spanish-speaking employee in RFTA's Marketing and Communications Department is available to assist with translation services as needed.

Disciplinary procedure

RFTA's disciplinary procedures are outlined in RFTA's 3 Departmental Handbooks for the Operations, Maintenance and Administrative/Facilities Departments. The Departmental Handbooks address employee infractions that lead to disciplinary actions or terminations and explain RFTA's progressive disciplinary procedures. Managers and supervisors are trained to coach employees in a timely manner to prevent ongoing disciplinary actions. We encourage directors, managers and supervisors to work closely with employees along a pathway that leads to enhanced performance and proper skills development.

Training

RFTA recognizes its responsibility to train and develop its employees. EEO-related training is routinely offered to employees of the Bus Operations and Maintenance Departments (RFTA's two largest departments) during annual mandatory In-Service Training sessions. EEO-related training is also offered to RFTA executive, management and supervisory personnel during regular supervisory training sessions and through external training sources as needed. Training objectives include teaching our employees about creating an environment that is free from all types of harassment, and one that values diversity and inclusion, is free from bias in which all employees are able to succeed.

Summary

An assessment of RFTA's recruitment, selection and promotions has not revealed any barriers that have inhibited recruitment, selection and promotion of protected classes. Our applicant flow remains diverse (consistent with RFTA's relevant labor market) and a qualified pool of candidates is generated for all advertised positions through our website, print media, and employee referrals.

RFTA hires an outside consultant to review internal and external data for the sole purpose of recommending a salary structure appropriate for the transportation industry and the geographic region served. RFTA last conducted a compensation analysis in October 2015. Department of Human Resources staff analyzes each position and implements salary adjustments as needed.

RFTA's disciplinary procedures are progressive in nature and include methods used to improve performance and avoid termination.

COMPENSATION

RFTA utilizes an outside consultant to review internal and external data for the sole purpose of recommending a salary structure appropriate for the transportation industry and the geographic region served. These policies, procedures and salary structures are outlined in policy statements and are available to all employees. RFTA is committed to having a total compensation program that attracts, retains, and motivates a highly qualified and competent workforce and provides employees with a total compensation package that is competitive with other leading organizations.

Compensation Program

- RFTA's compensation program includes wages and salary ranges that reflect the values of RFTA, as determined by a system of job evaluations and reviews, taking into account education, experience, skills, job complexity, problem solving skills, level of supervision required, accountability for planning, and budgetary impact of decision-making.
- RFTA ensures that compensation practices comply with all federal and state laws and support RFTA's on-going commitment to equal employment opportunity initiatives.
- All full-time, part-time, and seasonal employees are assigned a pay grade and/or appropriate pay rate, based on duties, responsibilities, and internal and external equity based on current pay rates of comparable positions.

RFTA has a conventional grade structure that aligns each position with the requirements of the job as outlined in the job description. Range spreads are analyzed and revised based upon market data. The consultant disseminates a survey of benchmarked positions, requesting agencies to determine comparable levels of work within their organizations. The consultant uses the survey results along with comprehensive local, state, regional and national salary database information to determine RFTA salary ranges.

RFTA's most recent compensation analysis was completed in October 2016. RFTA's compensation philosophy is to ensure employee salaries do not fall below the minimum of the salary range. Department of Human Resources staff analyzes each position, recommends salary adjustments, as needed, and reports the findings and conclusions to the CEO for approval. RFTA continues to meet the demands of the Roaring Fork Valley, by keeping salaries competitive.

During the course of any given calendar year, Department of Human Resources staff reviews employee salary levels to ensure they remain consistent with the marketplace. Recommendations for adjustments are made as needed. In addition, if the job responsibilities of a particular employee changes, the Department of Human Resources will work with the department head (Director) to revise the job description for the position and then sends the revised job description to the compensation consultant to determine if any adjustment to the salary range for the position is needed.

Comparative Salary Analyses

The charts below reflect a comparative analysis of salaries paid by job group, gender and race/ethnicity for all full-time RFTA employees.

Average of Annual Salary	Male	Female	Overall Average
Officials & Administrators	$127,615	$121,777	$124,696
Professionals	$74,417	$65,092	$69,755
Administrative Support	$43,001	$45,604	$44,303
Skilled Craft	$57,714	$49,823	$53,769
Service & Maintenance	$49,181	$45,336	$47,259
Grand Total	**$70,386**	**$65,526**	**$67,956**

Table 15. Salary Analyses by Job Group & Gender

Average of Annual Salary	White	Black	Hispanic	Asian	AI/AN	Multi-Racial	Overall Average
Officials & Administrators	$125,687	$0	$0	$138,861	$0	$0	$132,274
Professionals	$68,925	$58,510	$59,561	$0	$0	$0	$62,332
Administrative Support	$47,138	$0	$32,261	$0	$0	$0	$39,700
Skilled Craft	$58,052	$0	$54,465	$48,568	$0	$0	$53,695
Service & Maintenance	$51,415	$39,874	$46,360	$38,813	$39,666	$40,362	$42,748
Total Average	**$68,243**	**$49,192**	**$48,162**	**$75,414**	**$39,666**	**$40,362**	**$66,150**

Table 16. Salary Analyses by Job Group & Race/Ethnicity

MONITORING PROCEDURES

An internal monitoring and evaluation system to audit personnel policy, practices, and decisions is essential to ensure non-discrimination and the achievement of objectives and timetables. Additionally, an evaluation of progress is essential for assessing the overall effectiveness of RFTA's EEO/AAP and providing data upon which to base recommendations for future actions. To carry out these objectives, RFTA's monitoring and evaluation procedures include the following:

- A semiannual review and evaluation of RFTA's EEO/AAP activities by the EEO Officer with an annual summary to the CEO.
- Quarterly analysis of trends in workforce, hiring, promotions, and disciplinary actions with a quarterly report to the CEO.
- Semiannual attendance of Executive Leadership Team Meetings on progress and recommendations for problem areas.
- Annual assistance to management in establishing goals and objectives for the coming review cycle.

Measuring Success and Accountability

RFTA measures its Affirmative Action success in a variety of ways. Specific actions include:

- Creating and auditing RFTA's overall goals and department goals;
- Reviewing outreach efforts;
- Reviewing the diversity of applicant pools;
- Reviewing departmental employment data on a semi-annual basis as it relates to departmental goals;
- Sharing employment data related to RFTA and departmental goals with department leaders and executive leaders, semi-annually;
- The ability of RFTA to attract, welcome and succeed with a more diverse workforce;
- Promote an environment of respect and professionalism. Maintain a harassment-free and discrimination-free workplace.

REFERENCES

1) 28 CFR Part 42, Subpart F, Coordination of Enforcement of Nondiscrimination in Federally Assisted Programs
2) 29 CFR Part 1604, Guidelines on Discrimination Because of Sex
3) 29 CFR Part 1605, Guidelines on Discrimination Because of Religion
4) 29 CFR Part 1606, Guidelines on Discrimination Because of National Origin
5) 29 CFR Part 1607. Uniform Guidelines on Employee Selection Procedures
6) 29 CFR Part 1620, The Equal Pay Act
7) 29 CFR Part 1625, Age Discrimination in Employment Act
8) 29 CFR Part 1630, Regulations to Implement the Equal Employment Provisions of the Americans with Disabilities Act
9) 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
10) 49 CFR Part 27, Nondiscrimination on the Basis of Disability in Programs or Activities Receiving Financial Assistance
11) Age Discrimination in Employment Act of 1967, as amended, 29 U.S.C. § 621 et seq.
12) Americans with Disabilities Act of 1990, as amended, 42 U.S.C. § 12101 et seq.
13) DOT Order 1000.12, "Implementation of the Department of Transportation Title VI Program" (January 19, 1977)
14) DOT Order 1000.18, "External Civil Rights Complaint Processing Manual" (September 2007)
15) Equal Pay Act of 1963, as amended, 29 U.S.C. § 206(d)
16) Executive Order 11246, Equal Opportunity in Federal Employment (September 24, 1965)
17) Federal Transit Laws, 49 U.S.C. § 5301 et seq.
18) FTA Master Agreement
19) Sections 503 and 504 of the Rehabilitation Act of 1973, as amended, 29 U.S.C. §§ 793 and 794
20) Title II of the Genetic Information Nondiscrimination Act of 2008, as amended, 42 U.S.C. § 2000ff et seq.
21) Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000d et seq.
22) Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e et seq.
23) Title IX of the Education Amendments of 1972, as amended, 20 U.S.C. § 1681 et seq.
24) Uniformed Services Employment and Reemployment Rights Act of 1994 (USERRA), as amended, 38 U.S.C. §§ 4301 et seq.

DEFINITION OF TERMS

Affirmative Action: Specific actions in employment designed and taken to: 1) Ensure equal opportunity; 2) Eliminate barriers that prevent full participation in the workforce by members or racial/ethnic groups, women, and individuals with disabilities; 3) Eliminate disparity in the workforce of members of racial/ethnic groups or women in all job families; 4) Eliminate present effects of past discrimination.

Age Discrimination: Per Employment Act of 1967 means an individual who is 40 years or older.

Agency: A recipient or sub-recipient of financial assistance from the Federal Transit Administration (FTA).

Availability: The percentage and number of racial/ethnic group members, women, and individuals with a disability who are available to work and have the requisite job skills in the statewide labor market.

Complainant: A person who makes a complaint that he or she or any specific individual or class of person has been subjected to discrimination or retaliation prohibited by the Equal Employment Opportunity Commission (EEOC), United States Department of Transportation (USDOT), FTA, or any relevant legal authority.

Concentration: A higher participation of a particular group (e.g. African Americans, Hispanics, or women).

Contractor: Any entity or organization that has entered into a contract to perform work or provide services relating to transit service delivery with an applicant, recipient, or sub-recipient.

Direct Recipient: An entity that receives Federal financial assistance directly from the FTA.

Disability: In regards to an individual means 1) physical or mental impairment that substantially limits one or more major life activities; 2) a record or such an impairment; or 3) being regarded as having an impairment that is not transitory and minor. Major life activities include, but are not limited to, caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, working, and the operation of major bodily functions.

Discrimination: Any action or inaction, whether intentional or unintentional, in any program or activity or a recipient, sub-recipient, or contractor that results in disparate treatment or perpetuating the effects of prior discrimination based on race, color, religion, national origin, sex (including pregnancy, childbirth, or related medical conditions; gender identity; and sexual orientation), age (40 years and older), genetic information, disability, veteran status, retaliation, or results in disparate impact based on race, color, religion, national origin, sex (including pregnancy, childbirth, or related medical conditions; gender identity; and sexual orientation), age (40 years and older), genetic information, disability, veteran status, retaliation.

Disparate Impact: Policies or practices that are visibly neutral, but that disproportionately affect protected classes, if such policies and practices are not job related and consistent with business necessity, or, for policies or practices that disproportionately affect individuals age 40 years or older, if such policies or practices are not based on a reasonable factor other than age.

Disparate Treatment: Action that result in circumstances where similarly situated persons are intentionally treated differently (i.e. less favorably) than other because of their race, color, religion, national origin, sex (including pregnancy, childbirth, or related medical conditions; gender identity; and sexual orientation), age (40 years and older), genetic information, disability, or veteran status.

Diversity: Diversity is a broad concept that values all people equally, regardless of their differences.

Equal Employment Opportunity: Equal employment opportunity involves access to all available employment opportunities, under equal terms and conditions, with equal benefits and services without actions, policies, or practices that differentiate among applicants or employees on the basis of race, color, religion, national origin, sex (including pregnancy, childbirth, or related medical conditions; gender identity; and sexual orientation), age (40 years and older), genetic information, disability, or veteran status.

Equal Employment Opportunity Program (EEO Program): A written, detailed, results-oriented set of procedures designed to achieve prompt and full utilization of people within a protected class at all levels and in all parts of the recipient's workforce, including compensation.

Equal Employment Opportunity/Affirmative Action Plan: Is a comprehensive guide developed to reflect RFTA's good faith efforts in ensuring equal opportunity for all. It also identifies areas of minority, women, and disabled persons underrepresentation, as well as evaluates and analyzes personnel actions such as new hires, promotions, training, and disciplinary actions in an effort to attain goals.

Equal Employment Opportunity Statues and Regulations: All statutes and regulations that prohibit employment discrimination and provide employees and job applicants protections and remedies against employment discrimination.

Essential Functions: Essential functions involve fundamental job duties, tasks, or responsibilities which, if eliminated, would substantially alter the nature of the job.

Ethnic/Racial Minorities: The term minority includes people of the following racial/ethnic groups.

Minority Persons:

- *American Indians and Alaska Natives*, refers to individuals with origins in any of the original peoples of North and South America (including Central America) and who maintain tribal affiliation or community attachment;
- *Asians*, refers to individuals with origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam;

- *Blacks or African Americans*, refers to individuals with origins in any of the Black racial groups of Africa;
- *Hispanics or Latinos*, including individuals of Cuban, Mexican, Puerto Rican, South or Central America, or other Spanish culture or origin, regardless of race;
- *Native Hawaiians or other Pacific Islanders*, refers to people with origins in any of the original people of Hawaii, Guam, Samoa, or other Pacific Islands;
- *Multi-racial populations*, include individuals with origins in more than one of the federally designated racial categories.

Four-Fifths Rule: A disparate impact analysis which measures the effect an employment practice has on a protected class. When the selection rate for any race, sex, or ethnic group which is less than four-fifths (4/5) (80%) of the rate for the group with the highest rate will generally be regarded by the Federal enforcement agencies as evidence of disparate impact. A selection rate of greater than four-fifths rate will generally not be regarded by Federal enforcement agencies as evidence of disparate impact.

Goals: Goals are quantitative employment objectives with target dates employers voluntarily set to reduce or eliminate underrepresentation of protected classes in the workforce.

Good Faith Effort (GFE): Additional results-oriented efforts, such as, active and aggressive recruiting efforts designed to achieve diversity in the workplace.

National Origin: The particular nation where a person was born or where the person's parents or ancestors were born, or the common language, culture, ancestry, or other similar social characteristics associated with an ethnic group.

Non-Compliance: Failure to meet the requirements of EEO statutes and regulations or failure to implement an approved EEO Program.

Protected Class: Any category of person or status protected by any EEO statute or regulation.

Reasonable Accommodation: Offered to an individual with a disability is any change to a job, work environment, or the way things are usually done that allow an individual with a disability to apply for a job, perform job functions, or enjoy equal access to benefits and privileges available to other employees. A reasonable religious accommodation is any adjustment to the work environment that will allow an applicant or employee to practice or observe his or her religious beliefs.

Retaliation: Firing, demoting, or otherwise taking adverse action against an applicant or employee because that person filed a charge of discrimination, complained to his or her employer or other covered entity about discrimination, participated in an employment discrimination proceeding (such as an investigation or lawsuit), or otherwise engaged in protected activity.

Sex-Based Discrimination: Treating someone (an applicant or employee) unfavorably because of that person's sex, including pregnancy, childbirth, or related medical conditions. Discrimination against an individual on the basis of gender identity, including transgender status, or because of sexual orientation is also considered discrimination on the basis of sex in violation of Title VII.

Underutilization: A condition in which women and minorities are not being employed at a rate to be expected given their availability in the relevant labor pool.

EEO JOB CATEGORY DEFINITIONS

Officials and Administrators

Occupations requiring administrative personnel who set broad policies, exercise overall responsibility for execution of these policies, and direct individual departments of special phases of an agency's operation. Does not include sworn administrators. This category includes; executives, middle management, plan managers, department managers, superintendents, salaried supervisors who are members of management, purchasing agents, and buyers.

Professionals

An occupation requiring either a college degree or experience of such a kind provides a comparable background. Does not include sworn professionals. This category includes; attorneys, accountants, auditors, airplane pilots, navigators, architects, artists, chemist, designers, dietitians, editors, engineers, librarians, mathematicians, natural scientists, registered professional nurses, personnel and labor relations workers, physical scientist, physicians, social scientist, and teachers, research assistants, medical aides, child support worker, welfare service aides, library assistants and clerks, and ambulance attendants.

Technicians

NO RFTA EMPLOYEES IN THIS JOB GROUP - Occupations which require a combination of basic scientific or technical knowledge and manual skill which can be obtained through specialized post-secondary school education or through equivalent on-the-job training. This category includes; computer programmers, computer operators, drafting aides, electricians, engineering aides, junior engineer, mathematical aides, licensed practical or vocational nurses, photographers, radio operators, scientific assistants, surveyors, technical illustrators, medical technicians, dental technicians, electronic technicians, and physical science technicians.

Protective Service Workers

NOT APPLICABLE TO RFTA - All sworn and non-sworn occupations relating to the protection of people and property. This category includes; police officers, firefighters, security guards, fire protection guards, animal control workers, detectives, sworn investigators, bailiffs, correctional offic3rs, wardens, marshals, sheriffs, deputies, harbor-patrol officers, and park rangers. Protective Service Breakdown: a) Officials – all sworn officers beyond entry-level (Sergeants, Lieutenants, Captains, etc.) b) Patrol officers – all entry-level officers.

Paraprofessionals

NO RFTA EMPLOYEES IN THIS JOB GROUP - Occupations requiring basic semi-professional skills, which may be obtained through a year of post high school education, such as, may be obtained through a junior college or through equivalent on the job training. This category includes; paralegals, legal assistants, bookkeepers, insurance agents, real estate agents, and personnel assistants.

Office and Clerical

Includes all clerical type work, regardless of the level of difficulty, where the duties are predominantly non-manual, although some manual work not directly involved with altering or transporting the products is included. This category includes; cashiers, bill collectors, account collectors, messengers, office helpers, office machine operators, shipping and receiving clerks, stenographers, typist, secretaries and receptionist.

Skilled Craft

Manual workers who typically operate machine or processing equipment or perform other factory type duties of a skill level that can be mastered after an extensive period of training. This category includes; mechanics, repairers, skilled machine operators, typesetters, engravers, motion picture projectionists, stationary engineers, tailors, apprentices, delivery workers, motor operators, photographic process workers, truck and tractor drivers, welders, flame cutters, plumbers, bricklayers, carpenters, machinists, metalworkers, and auto attendants.

Service/Maintenance

Occupations in which workers perform duties, which result in or contribute to the comfort, convenience, or hygiene of the general public or which contribute to the upkeep and care of buildings, facilities, or grounds of public property. This category includes; cleaners, cafeteria workers, maintenance workers, and garbage laborers.

RFTA 2017 EEO-4 CATEGORIES-CLASSIFICATIONS

1. **Officials-Administrators**

Title	SOC Job Code
Chief Executive Officer	11-1011
Chief Financial Administrative Officer	11-1011
Chief Operations Officer	11-1011
Facilities Director	11-1011
Finance, Assistant Director	11-1011
Finance Director	11-1011
Human Resources & Risk Management Director	11-1011
Information Technology Director	11-1011
Operations Director	11-1011
Planning Director	11-1011
Project Management & Operations Assistant Director	11-1011
Vehicle Maintenance Director	11-1011

2. **Professionals**

Title	SOC Job Code
Application & Technology Specialist	15-1150
Assistant Planner	13-1199
AVL Farebox & Ridership Supervisor	15-1150
AVL Technician	15-1150
Business Specialist	13-1199
Buyer I, II	11-3061
Communications Manager	11-2031
Computer Technician	15-1152
Contract Administrator	11-3061
Executive Assistant to the CEO & Regulatory Compliance Officer	13-1041
Facilities Manager	11-3011
Graphic & Web-Designer & Marketing Assistant	15-1141
Human Resource Generalist	13-1070
Human Resource & Risk Management Analyst	13-1070
Information Technology Manager	11-3021
Information Technology Share-Point Administrator	15-1150

Operations Manager	11-1021
Operations Support Specialist	13-1199
Procurement Manager	11-3061
Project Manager	11-9199
Safety & Training Manager	11-9199
Scheduling & Service Planning Manager	11-9199
Senior Construction Manager	11-9199

3. **Technicians**

   Due to the low number of Technicians, these individuals were categorized under Professionals.

4. **Service Workers**

   NOTE: RFTA does not use Employee Classification Service Workers.

5. **Paraprofessionals**

   RFTA does not currently have any employees in this Classification.

6. **Administrative Support**

Title	SOC Job Code
Accounting Technician I, II	43-3031
Accounts Receivable, Revenue Receipting Specialist	43-3031
Administrative Assistant	43-6010
Customer Service Business Specialist	43-4051
Finance Payroll Specialist	43-3031
Procurement Specialist I, II	43-3061
Revenue Clerk I, II	43-3031

7. **Skilled Craft**

Title	SOC Job Code
EAM & Fuel Systems Administrator	49-3031
Facilities Assistant Manager	49-9071
Facilities Business Specialist II	49-9071
Facilities Maintenance Assistant Manager	49-9071
Facilities Manager	49-9071

Facilities Technician I, II, III	49-9071
Lead Mechanic	49-1011
Shop Foreman	49-1011
Transportation Collision & Service Technician	49-3031
Transportation Mechanic	49-3031
Transportation Service Technician	49-3031
Vehicle Maintenance, Trainer & Foreman	49-1011

8. **Service-Maintenance**

Title	SOC Job Code
CDL Bus Operator	53-3021
CDL Service Worker	53-3021
Janitor	37-2011
Non-CDL Bus Operator	53-3021
Non-CDL Service Worker	53-3021
Relief Supervisor	53-1031
Trails & Corridor Manager II	37-1012
Trails & Corridor Technician	37-3011
Transportation Supervisor	53-1031
Traveler Supervisor	53-1031

.

EXHIBIT 1

Signed Equal Employment Opportunity / Affirmative Action Plan Policy Statement

EQUAL EMPLOYMENT OPPORTUNITY/AFFIRMATIVE ACTION PLAN POLICY STATEMENT

Roaring Fork Transportation Authority (RFTA) is an Equal Employment Opportunity/Affirmative Action employer in compliance with applicable federal, state and local laws.

As RFTA's Chief Executive Officer (CEO), I am committed to ensuring the essential compliance of RFTA's Equal Employment and Affirmative Action Plan. I am dedicated to the principles and spirit of Equal Employment (EEO) and Affirmative Action (AA) for all employees and employment applicants.

RFTA's Equal Employment Opportunity/Affirmative Action Policy and Program is committed to compliance with all anti-discrimination laws, regulations and policies. RFTA will ensure Equal Employment Opportunity/Affirmative Action for all employees and applicants for employment regardless of race, color, religion, national origin, sex (including pregnancy, childbirth, or related medical conditions; gender identity; and sexual orientation), age (40 years and older), genetic information, disability, veteran status, retaliation, or any other applicable status protected by federal, state or local law. No person will be unlawfully excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any RFTA program or activity receiving Federal financial assistance. We will maintain a work environment that is free of discrimination.

RFTA holds all employees, beginning with myself, Chief Executive Officer, accountable for keeping our workplace free from discrimination, and ensuring that we provide equal employment opportunities for all personnel in our workforce and for those seeking to enter our workforce. To ensure day-to-day management, including program preparation, monitoring, compliance, and complaint investigation, I have appointed Nicole Schoon, Regulatory Compliance Officer, as RFTA's Equal Employment/Affirmative Action (EEO/AA) Officer. Ms. Schoon will report directly to me and acts on my authority, with all levels of management, labor unions and employees.

RFTA maintains a responsibility to ensure that equal opportunity is given to all employees so that they may participate, contribute, and advance in our workforce. Executives, Directors, managers, and supervisors are expected to ensure that employees are given equal opportunity for training, career development programs, promotions, transfers, demotion, layoffs, terminations, awards, recognition, rates of pay or other forms of compensation, and other benefits and privileges of employment. Through management practices and decisions, including effective outreach, recruitment, hiring, and employee development we can create an inclusive workforce that reflects a broad range of diversity. Reasonable accommodations for individuals with disabilities or religious practices will be permitted, as long as those accommodations do not create undue hardships on RFTA operations. Equal opportunity to work and advance, based on merit, not unlawful bias or prejudice is the law.

This EEO/AA Policy Statement is a reminder that all RFTA employees and applicants are protected under the laws we enforce and may seek assistance if they believe they have been subject to unlawful employment discrimination. RFTA employees or applicants who believe that they have been discriminated or retaliated against have the right to file a complaint with Nicole Schoon, EEO/AA Officer; the Colorado Civil Rights Division; or the Equal Employment Opportunity Commission (EEOC). Acts of retaliation against employees or applicants, who participate in the complaint or grievance process

(investigation or proceedings), are strictly prohibited and will not be tolerated. RFTA employees share in the responsibility to avoid harassing behavior and to report such conduct.

RFTA Executives, Directors, managers and supervisors will be held accountable and will share in the responsibility of ensuring compliance is achieved through understanding, communicating, monitoring and active involvement in the support of this EEO/AAP. Performance evaluations of Executives, Directors, managers and supervisors will include evaluating the success of the EEO/AAP, in the same manner as performance on other RFTA goals.

RFTA is thoroughly committed to undertaking and establishing a written Equal Employment Opportunity/ Affirmative Action Policy and Program that sets direct, regulated policies, practices and procedures, which include specific goals and timetables.

A copy of this Equal Employment Opportunity/Affirmative Action Plan can be viewed on the RFTA website; www.rfta.com, by requesting a copy by email; nschoon@rfta.com or in writing to:

Roaring Fork Transportation Authority
Attn: Nicole Schoon, EEO/AA Officer
2307 Wulfsohn Road
Glenwood Springs, CO 81601

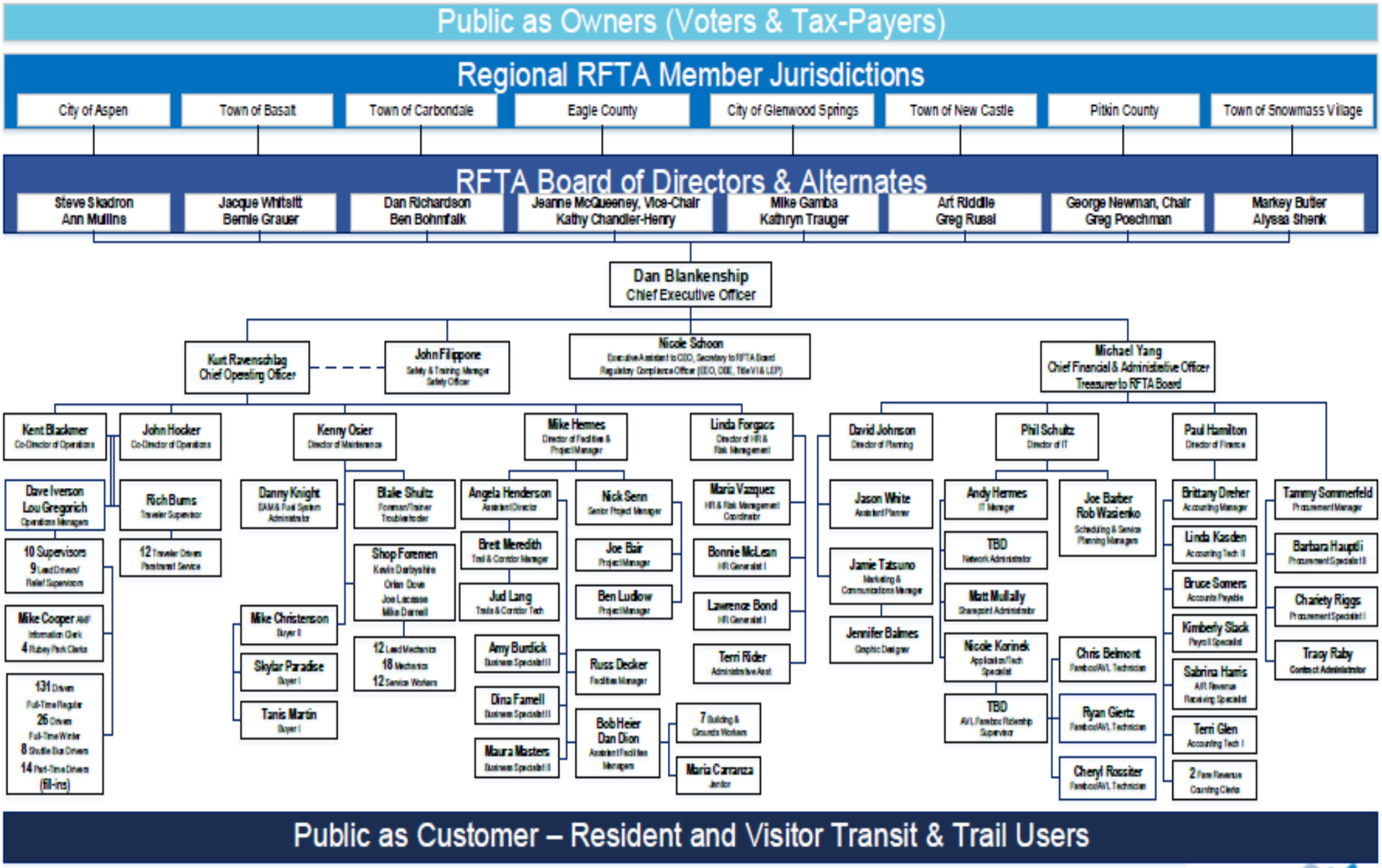
I am personally committed to a workplace that acts upon its daily responsibility to treat all employees and applicants with dignity, respect and equality. I expect all RFTA employees to monitor their conduct and behavior in the workplace and to act in conformance with the laws and guidelines of this Equal Employment Opportunity/Affirmative Action Plan.

_____

Dan Blankenship Date
Chief Executive Officer
Roaring Fork Transportation Authority

EXHIBIT 2

2018 RFTA Organizational Chart



2018 Organizational Chart

RFTA
ROARING FORK TRANSPORTATION AUTHORITY

EXHIBIT 3

EEO Officer Concurrence Checklist

RFTA EEO OFFICER CONCURRENCE CHECKLIST

To be used by the EEO Officer to ensure concurrence with the hiring and promotion process. Concurring in the hiring and promotion process. Concurrence in the hiring and promotion process means the EEO Officer has reviewed employment documents to ensure the actions are not discriminatory (i.e., does not result in disparate treatment or disparate impact.

NEW EMPLOYEE HIRE AND PROMOTIONS CHECKLIST

To:	EEO Officer
From:	Human Resources
Requisition/Job Posting #	_____
Date received from HR:	_____
Date returned to HR from EEO Officer:	_____
EEO Officer Comments:	

PROPER POSTING	**INITIAL**
Checked requisite posting period	
Compared posting to job description	
Reviewed justification for internal or departmental only posting (if applicable)	
Verified Recruitment Plan - Ensure memo/e-mail is a part of the packet	
JOB DESCRIPTION REVIEW	**INITIAL**
Determine whether this is an (1) existing position tile or a (2) newly created position title	
Examine whether the hiring department currently has incumbents in this position	
Ascertain whether the position title is appropriate for the overall nature of the duties described	
Review job descriptions for similar positions to check for consistency	
Review salary grade; confirm that it is appropriate for job/position title	
Confirm position has been placed in the proper EEO category	
Review general summary section to ascertain whether the description accurately reflects the core essence of the position. Examine each essential duty to determine whether the highest priority duties are consistent with duties ordinarily performed by an employee in this position. The most essential duty will be one which the position would not exist but for that function; it will be the function most frequently performed. Essential functions will be listed in order of priority	
Review the education and experience required by the job description. Verify that it is consistent with level of education and amount of experience typically required by incumbents in this position or similar positions. Determine whether the requisite qualifications are justified by business necessity for performance of this position	
For a supervisory or management position, review the organization chart and confirm that the position is appropriately titled by (1) comparing with similar positions, and (2) identifying the positions which are direct reports and reviewing the level of experience and education required for the subordinate staff. Identify whether supervisory or management experience is required; if so, determine whether the supervisory or management experience is specific and consistent wit the nature of the position	
APPLICANT POOL ANALYSIS	**INITIAL**
Qualification verification of (1) candidates selected for interview, or (2) audit/re-screen all applicants	
Confirm whether all candidates interviewed are eligible; justification for eligible candidates not interviewed	
Diversity check/utilization reviewed	
COMPENSATION ANALYSIS	**INITIAL**
Determination of internal salary parity	
Justification for placement level in range	
INTERVIEW REVIEW PROCESS EXAMINATION	**INITIAL**
Diversity in interview panel	
Interview packet review (questions, ranking, inappropriate remarks)	
FINALIZING REVIEW	**INITIAL**
Identify EEO concerns (if any)	
If rejected, discuss issue with HR representative, if appropriate - Note concurrence on packet or attach justification for rejection if unable to resolve EEO concerns	

EXHIBIT 4
Discrimination Complaint Procedure (English)

Federal law prohibits discrimination on the basis of race, color, religion, national origin, sex (including pregnancy, childbirth, or related medical conditions; gender identity; and sexual orientation), age (40 years and older), genetic information, disability, veteran status, retaliation, or any other applicable status protected by federal, state or local law, in any RFTA program or activity. This prohibition applies to all employees, departments and divisions of RFTA, contractors, consultants, and anyone else who acts on RFTA's behalf.

Anyone who believes they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any RFTA program or activity because of their race, color, religion, national origin, sex (including pregnancy, childbirth, or related medical conditions; gender identity; and sexual orientation), age (40 years and older), genetic information, disability, veteran status, retaliation, or any other applicable status protected by federal, state or local law may file a complaint.

Discrimination includes lack of access, harassment, retaliation and disparate impacts from a program or activity. Harassment includes a wide range of abusive and humiliating verbal or physical behaviors. Retaliation includes intimidating, threatening, coercing, or engaging in other discriminatory conduct against anyone because they filed a complaint or otherwise participated in a discrimination investigation.

Federal law requires that RFTA investigate, track, and report discrimination complaints. Complaints must be filed, in writing, within 180 days from the date of the alleged discrimination. Complaints must be filed in writing and will be investigated within thirty (30) days of submission.

RFTA will make reasonable efforts to assist persons with disabilities, non-English speakers, and others unable to file a written complaint. If you need assistance to file your complaint or need interpretation services, please contact the RFTA EEO Officer at (970) 384-4974.

Este procedimiento de queja y el Formulario de Queja de Discriminación están disponibles en español en www.rfta.com/title-vi (Proceso de queja - Español).

While not required, complainants are encouraged to use the Discrimination Complaint Form which can be found at www.rfta.com/title-vi (EEO Complaint Form).

Complaints may be submitted via email, fax or in person to the following:

Roaring Fork Transportation Authority
Nicole Schoon, Regulatory Compliance/EEO Officer
2307 Wulfsohn Road
Glenwood Springs, CO 81601
Phone: (970) 384-4974
Fax: (970) 384-4937
nschoon@rfta.com

Complaints may also be filed with the following agency:

Federal Transit Administration
Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor-TCR,
1200 New Jersey Ave., SE
Washington, DC 20590
(888) 446-4511

Investigating a complaint includes interviewing all parties involved and key witnesses. The EEO Officer may request relevant information such as books, records, electronic information, and other sources of information from all involved parties. The complainant has thirty (30) days from the original complaint date to respond to RFTA's EEO Officer with the requested information.

If the EEO Officer does not receive the requested information within thirty (30) days from the original complaint date, RFTA can administratively close the complaint. The complainant will be informed of the complaint closure through a; registered, return receipt letter.

After the EEO Officer reviews the complaint and any additional information, one of two letters will be issued to the complainant based on its findings:

1) Complaint Closure Letter: This letter will state that RFTA is found to be in compliance with EEO. The letter will include an explanation of why RFTA was found to be in compliance, and provide notification of the complainant's appeal rights.
2) Letter of Finding: This letter will state that RFTA is found to be in non-compliance with EEO. The letter will include a summary of allegations, each violation referenced, the applicable regulations, and a brief description of proposed remedies and actions taken. If the complainant wishes to appeal the decision contained in the Letter of Finding, he/she will have ten (10) days after receipt of the Letter of Finding to do so.

If the complainant is not satisfied with the findings and/or actions taken by RFTA, the complainant may file his/her complaint with the FTA's Office of Civil Rights.

Federal Transit Administration
Office of Civil Rights
Attention: EEO Officer
East Building, 5th Floor-TCR,
1200 New Jersey Ave., SE
Washington, DC 20590
(888) 446-4511
www.fta.dot.gov

These procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation between the affected parties and RFTA may be utilized for resolution. Complainants may

specify if there is a particular individual(s) that should not investigate your complaint due to conflict of interest or other reasons.

Federal law prohibits retaliation against individuals because they have filed a discrimination complaint of otherwise participated in a discrimination investigation. Any alleged retaliation should be reported in writing to the Title VI Compliance Officer.

EXHIBIT 5
Discrimination Complaint Procedure (Spanish)

Las leyes federales prohíben la discriminación en base a raza, color, origen nacional, sexo, edad o discapacidad en todos los programas y en todas las actividades del RFTA. Esta prohibición se aplica a todos los empleados, departamentos y divisiones de RFTA, contratistas, consultores y cualquier otra persona que actúe en nombre de la RFTA.

Toda persona que piense que ha sido excluida de la participación, que le negaron beneficios o que sufrió discriminación en relación con cualquier programa o actividad del RFTA debido a su raza, color, origen nacional, sexo, edad, o discapacidad puede presentar una queja.

La discriminación incluye falta de acceso, acoso, represalias e impactos desproporcionados en un programa o en una actividad. El acoso incluye una extensa variedad de conductas verbales o físicas abusivas y humillantes. Las represalias incluyen la intimidación, las amenazas, la coacción o las conductas discriminatorias contra una persona por haber presentado una queja o haber participado en una investigación de discriminación.

Las leyes federales requieren que el RFTA investigue, controle e informe las quejas por discriminación. Las quejas deben presentarse por escrito y se investigarán., dentro de los 180 días de la fecha de la supuesta discriminación. Las quejas deben ser presentadas por escrito y serán investigadas dentro de los treinta (30) días de la presentación.

RFTA tomara medidas razonables para asistir a las personas con discapacidades, que no hablan inglés y otros que no pueden presentar una queja por escrito. Para obtener ayuda para presentar una queja o necesita servicios de interpretación, comuníquese con el Oficial de EEO de la RFTA al (970) 384-4974

Aunque esto no es obligatorio, se recomienda a las personas que presentan la queja que usen el formulario de quejas por discriminación que se encuentra en www.rfta.com/title-vi (Proceso de queja - Español).

Las quejas pueden ser enviadas por correo electrónico, fax o en persona a lo siguiente:

Roaring Fork Transportation Authority
Nicole Schoon, Oficial de Cumplimiento/EEO
2307 Wulfsohn Road
Glenwood Springs, CO 81601

Las quejas pueden también ser archivadas con la agencia siguiente:

Federal Transit Administration
Office of Civil Rights
Atención: Coordinador del Programa EEO
East Building, 5th Floor-TCR,
1200 New Jersey Ave., SE
Washington, DC 20590
(888) 446-4511

Investigar una queja incluye entrevistar a todas las partes implicadas ya testigos clave. El Oficial de EEO puede solicitar información pertinente, como libros, registros, información electrónica y otras fuentes de información de todas las partes involucradas. El reclamante tiene treinta (30) días a partir de la fecha original de la queja para responder al Oficial de Cumplimiento de Titulo VI de la RFTA con la información solicitada

Si el Oficial de EEO no recibe la información solicitada dentro de los treinta (30) días de la fecha original de la queja, RFTA puede cerrar administrativamente la queja. El denunciante será informado del cierre de la queja por medio de un; Registrado, carta de recibo de devolución. Después de que el Oficial de EEO revise la queja y cualquier información adicional, una de las dos cartas será enviada al reclamante basado en sus hallazgos

1) Carta de Cierre de Quejas: Esta carta indicará que la RFTA se encuentra en cumplimiento con el EEO. La carta incluirá una explicación de por qué RFTA se encontró en cumplimiento, y proporcionar una notificación de los derechos de apelación del reclamante.
2) Carta de Búsqueda: Esta carta indicará que la RFTA se encuentra en incumplimiento con el EEO. La carta incluirá un resumen de las acusaciones, cada violación mencionada, las regulaciones aplicables, y una breve descripción de los remedios propuestos y las acciones tomadas. Si el reclamante desea apelar la decisión contenida en la carta de hallazgo, tendrá diez (10) días después de recibir la carta de hallazgo para hacerlo

Si el demandante no está satisfecho con las conclusiones y/o acciones tomadas por la RFTA, el querellante puede presentar su queja ante la Oficina de Derechos Civiles del FTA.

Federal Transit Administration
Office of Civil Rights
Attention: EEO Program Coordinator
East Building, 5th Floor-TCR,
1200 New Jersey Ave., SE
Washington, DC 20590
(888) 446-4511
www.fta.dot.gov

Estos procedimientos no niegan el derecho del demandante a presentar quejas formales con otras agencias estatales o federales o buscar un abogado privado para las quejas alegando discriminación. Se hará todo lo posible para obtener una resolución temprana de las quejas al nivel más bajo posible. La opción de mediación informal entre las partes afectadas y la RFTA puede ser utilizada para la resolución. Los reclamantes pueden especificar si hay un individuo en particular que no debe investigar su queja debido a un conflicto de intereses u otras razones.

Las leyes federales prohíben las represalias contra las personas por presentar una queja por discriminación o por participar en una investigación de discriminación Tota presunta represalia debe informarse por escrito al Oficial de Cumplimiento de Título VI.

EXHIBIT 6
EEO Complaint Form (English)

EQUAL EMPLOYMENT OPPORTUNITY (EEO) COMPLAINT FORM

For questions or to request a copy of RFTA's EEO/AAP and Complaint Procedures call Nicole Schoon, EEO Officer and Regulatory Compliance Officer, (970)384-4974 or email nschoon@rfta.com.

Name (Complainant):	
Phone Number: ( )	Email:
Address:	
City: State: Zip Code:	

Reason (basis) for claim of discrimination: (Indicate information requested)	
☐ Race ☐ Color ☐ Religion ☐ National Origin ☐ Genetic Information ☐ Compensation ☐ Retaliation	☐ Sex (including pregnancy, childbirth, or related medical conditions; gender identity; and sexual orientation) ☐ Age (Date of Birth) ☐ Disability ☐ Veteran Status ☐ Sexual Harassment ☐ Other (Explain) _____
What happened to you that you believe was discriminatory? (Include date(s) of harm, actions(s), and names(s) and title(s) of person(s) who you believe discriminated against you.) (Please attach additional pages if needed)	
(1) Action:	Date of incident:
Name/Title:	Title:
(2) Action:	Date of Incident:
Name/Title:	Title:
Briefly explain the situation/incident: (Attach separate sheet(s), if necessary)	

RFTA is an Equal Opportunity/Affirmative Action Employer
RFTA does not discriminate on the basis of race, color, religion, national origin, sex (including pregnancy, childbirth, or related medical conditions; gender identity; and sexual orientation) age (40 years and older), genetic information, disability, veteran status, retaliation, or any other applicable status protected by Federal, State, or Local law.

Witnesses: ☐ YES ☐ NO
List Witnesses: (Use a separate sheet, if necessary)
(1) Name:
Phone Number: ( )
Information witness can provide about event(s):
(2) Name:
Phone Number: ( )
Information witness can provide about event(s):
(3) Name:
Phone Number: ( )
Information witness can provide about event(s):

Individuals you reported the alleged event to; when (dates) and method (verbally, email, etc.)		
Name	Date	Method of Communication
_____	_____	_____
_____	_____	_____
_____	_____	_____

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AFFIRMATION

By signing below, you agree that (1) you have read, understand and accept the terms and procedures for tracking and investigating discrimination complaints and (2) you affirm that the information above is true to the best of your knowledge.

I understand that in addition to actions taken by RFTA in this matter, I have the right to file a complaint with the Colorado Division of Civil Rights (CDCR) and/or the US Equal Employment Opportunity Commission (EEOC).

_____ Signature
_____ Printed Name
_____ Date

Send this completed form along with any written materials or other information that you think is relevant to your complaint to:

Roaring Fork Transportation Authority
Nicole Schoon, Regulatory Compliance/EEO Officer
2307 Wulfsohn Road
Glenwood Springs, CO 81601

Internal Use Only
To be completed by Nicole Schoon, EEO Officer Accepted for formal Investigation _____/_____/_____ Referred to another department on _____/_____/_____ Rejected _____/_____/_____ Reason for Rejection: _____

_____
Nicole Schoon, EEO Officer

_____
Date

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EXHIBIT 7
EEO Complaint Form (Spanish)

LA IGUALDAD DE OPORTUNIDADES DE EMPLEO (EEO) FORMULARIO DE QUEJA

Para preguntas o para solicitar una copia del Plan de EEO/AA de la RFTA y los procedimientos de quejas, contacto Nicole Schoon, Oficial EEO y Oficial de Cumplimiento Regulaciones de RFTA, (970) 384-4974 o correo electrónico a nschoon@rfta.com.

Nombre (de la persona de la queja):		
Teléfono: ( )	Correo Electrónico:	
Dirección:		
Cuidad:	Estado:	Código postal:

Razón del intento de discriminación (indicar con la información requerida)	
☐ Raza ☐ Color ☐ Religión ☐ Origen Nacional ☐ Información Genética ☐ Compensación ☐ Desquite	☐ Sexo (incluyendo embarazo, parto o condiciones médicas relacionadas; identidad de género; y orientación sexual) ☐ Edad (fecha de nacimiento) ☐ Discapacidad ☐ Estatus de Veterano ☐ Acoso Sexual ☐ Otro (especifique) _____
¿Qué paso que usted considera fue discriminatorio? (Incluya la fecha(s) de daño, acciones y nombres y títulos de la persona(s) que cree que fue discriminatorio en su contra.) (Adjunte una hoja aparte, si es necesario)	
(1) Acción:	Fecha del incidente:
Nombre:	Título:
(2) Acción:	Fecha del incidente:
Nombre:	Título:
Explique brevemente la situación/incidente: (Adjunte una hoja aparte, si es necesario)	

RFTA es un Empleador de Igualdad de Oportunidades/Acción Afirmativa

RFTA no discrimina sobre la base de la raza, color, religión, sexo (incluyendo embarazo, parto o condiciones médicas relacionadas; identidad de género; y orientación sexual), edad (40 años y mayores), información genética, discapacidad, estado de veterano, represalias, o cualquier otro estatus aplicable protegido por ley federal, estatal o local.

Testigo(s): ☐ SÍ ☐ NO
Lista Testigo(s): (Adjunte una hoja aparte, si es necesario)
(1) Nombre:
Teléfono: ( )
El testigo de información puede proporcionar el evento(s):
(2) Nombre:
Teléfono: ( )
El testigo de información puede proporcionar el evento(s):
(3) Nombre:
Teléfono: ( )
El testigo de información puede proporcionar el evento(s):

Las personas a las que informo el supuesto suceso; cuando (fechas) y método (verbalmente, correo electrónico, etc.)		
Nombre	Fecha	Método de comunicación
_____	_____	_____
_____	_____	_____
_____	_____	_____

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AFIRMACIÓN

Al firmar a continuación, usted acepta que (1) ha leído, comprendido y acepto los términos y procedimientos para rastrear e investigar las quejas de la discriminación y (2) afirmar que la información anterior es fiel a lo mejor de su conocimiento.

Entiendo que además de las acciones tomadas por RFTA en este asunto, Tengo derecho a presentar una queja ante la División de Derechos Civiles de Colorado (CDCR) y/o la Comisión de Igualdad de Oportunidades de Empleo de los Estado Unidos (EEOC).

_____ Signatura
_____ Nombre impreso
_____ Fecha

Enviar este formulario completo junto con cualquier material escrito o cualquier otra información que usted piensa que es relevante para su queja a:

Roaring Fork Transportation Authority
Nicole Schoon, Oficial de EEO
2307 Wulfsohn Road
Glenwood Springs, CO 81601

SOLO PARA USO INTERNO

Para ser completado por Nicole Schoon Oficial de EEO
Aceptado para investigación formal _____/_____/_____
Remitido a otro departamento en _____/_____/_____
Rechazado _____/_____/_____
Motivo del rechazo: _____

_____
Nicole Schoon, Oficial de EEO

_____
Fecha

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