



**Virginia Regional Transit**

**EQUAL EMPLOYMENT OPPORTUNITY POLICY**

**DECEMBER 2021**

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## Section 1 - Policy Statement

Virginia Regional Transit (VRT) has a strong commitment to the community we serve and our employees. As an equal opportunity employer, we strive to have a workforce that reflects the community we serve. No person is unlawfully excluded from employment opportunities based on race, (which includes discrimination on the basis of traits historically associated with race, such as hair texture, hair type, and protective hairstyles such as braids, locks, and twists) color, religion, national origin, sex (including gender identity, sexual orientation, pregnancy, childbirth or related medical conditions, including lactation), age, marital status, genetic information, disability, veteran status, or other protected class.

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

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

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

As Virginia Regional Transit's Chief Executive Officer (CEO), I maintain overall responsibility and accountability for Virginia Regional Transit's compliance with its EEO policy and plan. To ensure day-to-day management, including program preparation, monitoring, and complaint investigation, I have appointed the Director of Financial Services and Human Resources as Virginia Regional Transit's EEO officer. The Director of Financial Services will report directly to me and acts with my authority with all levels of management and employees.

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

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

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



06/30/2021

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Bruce Simms  
Chief Executive Officer

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[Date]

Guiding Legislation:

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

## Section 2 - Dissemination

According to the U.S. Department of Transportation's FTA C 4701.1A circular dated October 31, 2016 and revised April 1, 2017, public transit agencies receiving federal funding assistance in excess of \$1,000,000 in the previous federal fiscal year and employing 50 or more transit-related employees must prepare, implement, and evaluate a formalized EEO Plan (EEO Plan). Formalized communication mechanisms have been established to publicize and disseminate VRT's policies to its employees, applicants, and the general public.

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

### External Dissemination

The EEO Plan will be disseminated under the guidance of the Virginia Regional Transit's Chief Executive Officer. The general guidelines for external dissemination shall be:

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

### Internal Dissemination

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

### **Section 3 - Designation of Responsibility**

The Chief Executive Officer is recognized as the point of final authority and responsibility for Virginia Regional Transit's EEO Plan. The Director of Finance and Human Resources will serve as the EEO Officer and has immediate and continuing administrative responsibility and authority, which is delegated by the CEO, in matters related to Virginia Regional Transit's total equal employment affirmative action obligations. Each Virginia Regional Transit Senior Staff team member will be responsible within his/her respective duties for EEO plan implementation and progress.

#### EEO Officer

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

- Developing the EEO policy statement and a written EEO plan.
- Assisting management in collecting and analyzing employment data, identifying problem areas, setting goals and timetables, and developing programs to achieve goals.
- Designing, implementing, and monitoring internal audit and reporting systems to measure program effectiveness and to determine where progress has been made and where proactive action is needed.
- Reviewing the agency's nondiscrimination plan with all managers and supervisors to ensure that the policy is understood.
- Concurring in the hiring and promotion process.
- In conjunction with human resources, periodically reviewing employment practices policies (e.g., hiring, promotions, and training), complaint policies, reasonable accommodation policies, performance evaluations, and grievance procedures.
- Reporting at least semiannually to the Executive Director on progress in relation to the agency's goals and on contractor and vendor compliance.
- Serving as liaison between the agency; Federal, state, county, and local governments; regulatory agencies; and community groups representing minorities, women, and persons with disabilities, and others.
- Maintaining awareness of current EEO laws and regulations, and ensuring the laws and regulations affecting nondiscrimination are disseminated to responsible officials.
- Investigating complaints of EEO discrimination.
- Providing EEO training for employees.
- In conjunction with human resources, advising employees and applicants of available training programs and professional development opportunities and the entrance requirements.
- Conducting EEO training for all new supervisors or managers within 90 days of their appointment
- Maintaining agendas and sign-in sheets for meetings conducted when the EEO policy and its implementation are explained
- Auditing postings of the EEO policy statement to ensure compliance information is posted and up to date.
- EEO Officer and all individuals investigating EEO complaints must have EEO investigative training provided by a qualified instructor

#### Senior Staff (as defined by the CEO)

- Ensuring that hiring, training, promotion, and development opportunities at all levels of his or her area of responsibility are made without regard to race, color, religion, national origin, sex (including gender identity, sexual orientation, and pregnancy), age, genetic information, disability, veteran status, or other protected class.
- Assisting in identifying problem areas.
- Reviewing qualifications of employees in areas of responsibility to ensure minorities and women are given full opportunity for transfers and promotions.
- Participating in periodic audits to ensure that each agency unit is in compliance.
- Taking action to prevent discriminatory behavior in their areas of responsibility, including, but not limited to, sexual harassment.
- Ensuring that posters and notices are properly displayed in areas of responsibility.
- Ensuring that management and supervisory personnel in their areas of responsibility comply with the spirit and policies of the EEO.
- Reporting any claim of discrimination to the Director of Finance.
- Cooperating with compliance reviews, government funding agencies, government investigation agencies, and/or the Office of Civil Rights and Labor Relations relative to the discharge of their duties.

#### All Staff

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

## Section 4 - Utilization Analysis

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

EEO Job Categories:

Job Group	Category	Number of Virginia Regional Transit employees as of 12/21
1	Executive/Senior Level Officials and Managers	3
2	First/Mid-Level Officials and Managers	7
3	Professionals	1
4	Technicians	0
5	Sales Workers	0
6	Administrative Support Workers	13
7	Craft Workers	5
8	Operatives	122
9	Laborers and Helpers	0
10	Service Workers	0

*Definitions of categories found in Appendix A*

### Availability Analysis

See attached Utilization Analysis worksheet.



## Section 5 - Goals and Timetables

Virginia Regional Transit's Equal Employment Opportunity Program has been established to ensure a diverse workforce. As of June 2021, Virginia Regional Transit employed a total of 154 employees. Of the 154 employees, 55 are female, which is 36% of the workforce. Of the 135 employees that opted to self-identify ethnic origin, 41 identified as a minority, which is 27% of the workforce.

Virginia Regional Transit employs workers in six of the ten job group categories. Using 2016 data provided by the Virginia Department of Rail and Public Transportation, VRT has exceeded the availability of females in job groups 1/2(Exec/ Officials and Managers) and 6 (Admin support workers) and exceeded the availability of minorities in job groups 3 (Professionals) and 8 (Operatives).

Due to the underutilization of females in job groups 2, 7 and 8 and the underutilization of minorities in job groups 1, 6 and 7, Virginia Regional Transit has set the following goals:

**Goal 1:** Virginia Regional Transit's goal is to increase the number of females employed in the Job Group 1 workforce to 30% by year 2024.

This job group includes administrative personnel such as Finance Manager, HR Generalist and Accountant. Due to low turn-over rate for these positions, a long term goal of 2024 was set.

**Goal 2:** Virginia Regional Transit's goal is to increase the number of Male and Female Hispanic/Latino employees employed in the Job Group 8 workforce to 18 % by year 2024.

This job group includes drivers, which is currently a difficult position to recruit. Competition is with the school systems that offer schedules and hours that meet part-time employees' schedules. Due to the low turn-over rate for these positions, a long term goal of 2024 was set.

## Section 6 - Assessment of Employment Practices

Virginia Regional Transit is fully committed to a workforce that reflects the community we serve. Virginia Regional Transit will not tolerate any person being unlawfully excluded from employment or promotion opportunities based on race (which includes discrimination on the basis of traits historically associated with race, such as hair texture, hair type, and protective hairstyles such as braids, locks, and twists) color, religion, sex (including gender identity, sexual orientation, pregnancy, childbirth or other related medical conditions, including lactation), age, marital status, genetic information, national origin, disability, veteran status or any other protected characteristic as established by law.

Virginia Regional Transit's commitment to EEO compliance is demonstrated in the success the organization has achieved in meeting or exceeding the availability of females in five of the seven job categories and six of the seven job categories for minorities. To continue Virginia Regional Transit's successes and meet the goals previously stated, Virginia Regional Transit will:

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

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### Testing

After completing training, bus driver candidates complete a written test to ensure knowledge of Virginia Regional Transit policies, rules, regulations, and information.

The determination of a bus driver candidate passing the practical job activities analysis is pass/fail. The test is based upon the Vehicle Operator's Manual. If the candidate is unable to complete more than one activity, this will be considered a fail. The only exception is the wheelchair manipulation activities as these are critical job duties. Information is given to the Road Supervisor concerning the candidate's demonstrated level of function and if they were able to complete all activities or not. Additionally, information regarding demeanor, work pace, and any volunteered information relevant to successful employment is conveyed. The test administrator does not inform the candidate whether they passed or failed the test. The Road Supervisor is provided a copy of the analysis and informs the candidate of the results. Bus driver trainees complete the test to ensure knowledge of policies, rules, regulations, and information. If a bus driver does not achieve the minimum score he/she will go through a remediation lesson/class to ensure understanding prior to a retest.

### Promotions and Transfers

Virginia Regional Transit encourages its current employees to advance within the organization. As stated in Virginia Regional Transit's Personnel Policy, job openings are posted internally for qualified candidates to apply. Additionally, bus operators are encouraged to learn, and offered training, to work in the office. This cross-training increases the employee's skills and makes them more marketable and competitive for promotions and transfer opportunities. Additionally, leadership training is scheduled for employees with identified talent. Such training is provided through the local Community College, Community Transportation Association of America, National Transit Institute, or other recognized training programs.

### Seniority Practices

Virginia Regional Transit uses seniority to determine work assignments and vacation selection for all employees.

### Training

Beyond required training to perform the duties required of each position, Virginia Regional Transit works within its budget to offer additional training opportunities. Bus operators are encouraged to learn, and are offered training to work in administrative positions. This cross training increases the employee's skills and makes them more marketable and competitive for future opportunities as they become available. Office staff identified for increased responsibilities is offered formal supervisory training based on their existing skills and abilities. Through outreach efforts, Virginia Regional Transit works with female and minority groups to identify skills needed to fill vacancies and options to gain those skills.

### Compensation and Benefits

It is Virginia Regional Transit's policy to administer wages and salaries based on the duties of the job performed and the individual's prior work experience, education, performance, and training. Virginia Regional Transit requests salary market surveys yearly. These surveys ensure each person is paid a competitive salary compared to similar jobs in the area. The Director of Human Resources shall, prior to the preparation of yearly budget estimates, make an analysis and recommendation on the pay plan. This analysis may include such items as changes in prevailing rates of pay in comparable positions in the public sector, and in the local private sector; recruitment and retention experience; and internal pay relationships among classes.

### Disciplinary Procedures and Termination Practices

Virginia Regional Transit recognizes the need for clearly defined disciplinary procedures and termination practices. Therefore, these procedures and practices are defined in Virginia Regional Transit's personnel handbook.

### Statistical Impact of Employment Practices on Minorities and Women

Statistical data that show any potential impact of an agency's employment practices on minorities and women.

VRT realized in late 2021 that it did not have a sufficient mechanism in place to accurately track employment practices and document statistical data and trends. VRT realized the importance of being able to accurately track:

- the number of applicants for employment in each job category and the number hired, cross-referenced by sex and race;
- the number of employees in each job category who applied for promotion or transfer, cross-referenced by sex and race;
- the number of employees in each job category promoted or transferred, cross-referenced by sex and race;
- the number and types of disciplinary actions (e.g., indefinite suspension, loss of pay, demotion), cross-referenced by sex and race;
- the number of voluntary/involuntary terminations, cross-referenced by sex and race;
- training that fosters promotion potential, cross referenced by sex and race;

Individuals with Disabilities and Veterans - statistical data that show any potential impact of an agency's employment practices on persons with disabilities and veterans including:

- number of applicants for employment and promotions in each job category
- the number hired and promoted, cross-referenced by sex and race

Utilizing our payroll provider Paycom, VRT will track and monitor these data points to the extent possible given the voluntary nature of some of the data.

## **Section 7 - Monitoring and Reporting**

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

VRT maintains a complaint log. Upon receipt of an EEO complaint the EEO Officer will complete the log providing the complainant's name, basis of the complaint, protected group, date of initial contact, date of resolution, resolution reached, and the name of the investigator. The EEO Officer will provide a letter within three (3) business days of receipt to the complainant acknowledging receipt of the complaint. The EEO Officer will then investigate the complaint and provide the results to the complainant and CEO.

## **Section 8 - EEO Complaint Process**

Any employee or applicant alleging to be subjected to discrimination, unfair practice, or retaliation on the basis of any of the protected classifications noted in the EEO Policy Statement may file a written complaint within 180 days of the alleged violation to the EEO Officer located at PO Box 2665 Purcellville VA, 20132, or by telephone at 540-338-1610 ext-1102. Upon filing the complaint of alleged discrimination, the EEO Officer will proceed with an investigation to determine if there has been a violation of this policy.

If for some reason an employee or applicant does not want to bring a complaint to the EEO Officer, then the employee or applicant should contact the CEO concerning the complaint. The CEO can be contacted by writing to PO Box 2665 Purcellville VA, 20132, or by telephone at 540-338-1610 ext-2101. The CEO will communicate and provide the results of his or her investigation to the EEO Officer.

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

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

## Section 9 - Policy Execution

This Equal Employment Opportunity policy has been executed this day.

Bruce Simms, CEO

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*Name and Title*

A handwritten signature in black ink, appearing to read "Bruce Simms", is positioned above a horizontal line.

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*Signature*

## **Appendix A – Description of Job Categories**

**Executive/Senior Level Officials and Managers.** Individuals who plan, direct and formulate policies, set strategy and provide the overall direction of enterprises/organizations for the development and delivery of products or services, within the parameters approved by boards of directors or other governing bodies. Residing in the highest levels of organizations, these executives plan, direct or coordinate activities with the support of subordinate executives and staff managers. They include, in larger organizations, those individuals within two reporting levels of the CEO. Examples of these kinds of managers are: chief executive officers, chief operating officers, chief financial officers, line of functional areas or operating groups, chief information officers, chief human resources officers, chief marketing officers, chief legal officers, management directors and managing partners.

**First/Mid Level Officials and Managers.** Individuals who serve as managers, other than those who serve as Executive/ Senior Level Officials and Managers, including those who oversee and direct the delivery of products, services or functions at group, regional or divisional levels of organizations. These managers receive directions from the Executive/Senior Level management and typically lead major business units. They implement policies, programs and directives of executive/senior management through subordinate managers and within the parameters set by Executive/Senior Level management. Examples of these kinds of managers are: vice presidents and directors, Group, regional or divisional controllers; treasurers; human Resources, information systems, marketing, and operations managers. The First/Mid Level Officials and Managers sub-Category also includes those who report directly to middle managers. These individuals serve at functional, line of business segment or branch levels and are responsible for directing and executing the day-to-day operational objectives of officials and managers to subordinate personnel and, in some instances, directly supervising the activities of exempt and non-exempt personnel. Examples of these kinds of managers are: first-line managers; team managers; unit managers; operations and production managers; branch managers; administrative services managers; purchasing and transportation managers; storage and distribution managers; call center or customer service managers; technical support managers; and brand or product managers.

### **Professionals.**

An occupation requiring either a college degree or experience of such a kind provides a comparable background. Does not include sworn professionals. Examples: 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.**

Occupations requiring a combination of basic scientific knowledge and manual skill which can be obtained through two years of post-high school education, such as may be obtained through a junior college, technical institute, or through equivalent on the job training. Examples: 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.



**Administrative Support Workers.**

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. Examples: Cashiers, bill collectors, account collectors, messengers, office helpers, office machine operators, shipping and receiving clerks, stenographers, typist, secretaries and receptionist.

**Craft Workers**

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. Examples: 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 Workers**

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. Examples: Bus drivers, cleaners, cafeteria workers, maintenance workers, and garbage laborers.

**Operatives.**

**Laborers and Helpers.**

**Sales Workers.**

Source: <https://www.eeoc.gov/employers/eeo1survey/jobclassguide.cfm>

## **Appendix B - EEO Job Categories at Virginia Regional Transit**

### Job Group 1 - *Executive/Senior Level Officials and Managers*

Chief Executive Officer  
Director of Operations  
Director of Financial Services  
Director of Human Resources

### Job Group 2 – First/Mid Level Officials and Managers

Transit Manager  
Finance Manager  
HR Manager

### Job Group 3 - Professionals

Network Administrator  
Finance Manager

### Job Group 4 – Technicians

Information Technology Specialist

### Job Group 5 – Sales Workers

### Job Group 6 – Administrative Support Workers

Executive Administrative Assistant  
Human Resources Specialist  
Staff Accountant  
DMV Customer Service  
Dispatcher  
Receptionist  
Strategic Partnership Coordinator

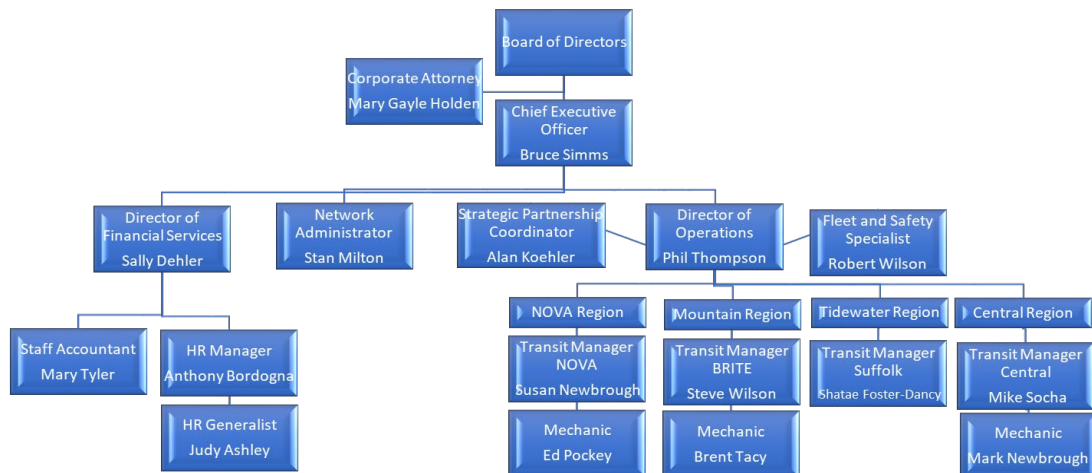
### Job Group 7 – Craft Workers

Mechanic  
Vehicle Emission Agent

### Job Group 8 – Operatives

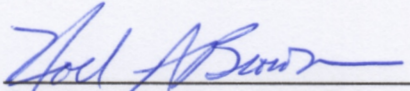
Bus Operators  
Operations Supervisor  
Custodian  
Vehicle Attendant  
Fleet and Safety Training Specialist

## Appendix C – Organizational Chart



## Appendix D – Virginia Regional Transit Board of Directors Acknowledgement

I hereby acknowledge the receipt of the Virginia Regional Transit's EEO Policy and Program. The Virginia Regional Transit Board of Directors has reviewed and approved the EEO Policy and Program. We are committed to ensuring that no person is unlawfully excluded from employment opportunities based on race, color, religion, national origin, sex (including gender identity, sexual orientation, and pregnancy), age, genetic information, disability, veteran status, or other protected class.



Signature of Authorizing Official

Noel A. Brown, Chairman of the Board of Directors

Virginia Regional Transit

12/31/2021

[Date]