

**EQUAL EMPLOYMENT OPPORTUNITY AND  
AFFIRMATIVE ACTION PLAN**

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## **1.0 SECRETARIAT**

### **1.1 SECRETARIAT POLICY AND PROCEDURE**

As used herein, the Executive Office of Transportation (“EOT”) refers to all the state agencies of the Secretariat, including the Executive Office, the Massachusetts Highway Department (“MHD”), the Registry of Motor Vehicles (“RMV”) and the Massachusetts Aeronautics Commission (“MAC”). The Executive Office of Transportation Affirmative Action Plan (“the Plan”) is designed to track personnel actions, inform EOT, the Office of Diversity and Equal Opportunity (“ODEO”), and local communities of programs and procedures undertaken by EOT to ensure equal employment opportunity and to ensure the implementation of all applicable state and federal laws and regulations. The Plan specifically describes the delegation of responsibilities to various individuals within EOT for the implementation of affirmative action and equal employment opportunity programs, workforce availability data and utilization analysis, biennial placement goals and action-oriented programs.

Federal affirmative action regulations and state policy stipulate that the Plan must be evaluated, monitored and updated biennially. To this end, progress toward program goals will be assessed at regular intervals, deficiencies identified, and corrective adjustments made.

Policies and procedures pertaining to personnel and human resources shall reflect EOT’s commitment to affirmative action and equal employment opportunity by integrating pertinent aspects of the Plan. The Civil Rights Officer may propose additional activities for the purpose of strengthening EOT’s commitment to equal opportunity/affirmative action (“EO/AA”).

## **2.0 DISSEMINATION**

The Office of Civil Rights (“OCR”), in conjunction with appropriate staff, shall see that EOT’s commitment to equal employment opportunity and affirmative action is communicated in the following ways:

### **2.1 INTERNAL**

- (1) The Statement of Policy shall be posted on all bulletin boards where official notices are displayed.
- (2) Meetings shall be held with managerial personnel to clarify the intent of the policy and to outline each manager’s responsibilities in his/her role as an equal employment opportunity supervisor.
- (3) The Statement of Policy shall be discussed in employee orientation and training programs. A summary of the key provisions shall be made available during employee orientation.
- (4) Within 30 days after approval of the plan by the Director of the ODEO, EOT will advise ODEO of the dates when meetings are scheduled with union officials to inform them of the policy and to request their cooperation. EOT shall make every effort within its authority to include nondiscrimination clauses in all union collective bargaining agreements. In addition, current union contract provisions shall be reviewed to ensure they are nondiscriminatory.
- (5) The Plan shall be made available to employees via EOT’s IntraWay to inform them that violations may be addressed through EOT’s Resolution Process (as referenced in sec. 6.0 below).

## **2.2 EXTERNAL**

- (1) The public shall be notified of EOT's Plan through postings and publications. The Statement of Policy and a summary of the key provisions of the Plan shall be made available to the public upon request.
- (2) A variety of recruitment sources shall be notified of EOT's Plan. These groups are encouraged to refer minorities, women, Vietnam-era veterans, and persons with disabilities for job openings.
- (3) All communication with the public in regard to recruitment, jobs, interviews, and employment shall emphasize that EOT is an EO/AA/VEV/Disabled employer.
- (4) EOT employment applications shall include a statement that it is an EO/AA/VEV/Disabled employer.
- (5) Recruitment advertisements shall include a statement of EOT's commitment to the Plan.
- (6) Job applicants may obtain a copy of EOT's Plan through a website on all job postings, and will be eligible to use the resolution process contained therein.

## **3.0 DESIGNATION OF AFFIRMATIVE ACTION AND EQUAL OPPORTUNITY RESPONSIBILITIES**

### **3.1 CHIEF EXECUTIVE OFFICER**

The Secretary, as the Chief Executive Officer, has overall responsibility for ensuring equal employment opportunity and affirmative action within EOT.

### **3.2 CIVIL RIGHTS OFFICER**

**3.2.1** The Director of OCR, Angela Hemingway Rudikoff (617-973-7024), as the **Civil Rights Officer**, reports directly to the Secretary. The Civil Rights Officer is responsible for implementing the Plan, and has the day-to-day responsibilities for its development, coordination and monitoring.

The Civil Rights Officer is provided with sufficient authority, as well as top management support and staffing, to enable her/him to execute her/his responsibilities, and is identified in all internal and external communications regarding EOT's program.

The Civil Rights Officer and appropriate staff shall work with commitment to this program, and shall possess an ability to effectively communicate and work with others to achieve EOT's goals. The Civil Rights Officer shall be assisted in all aspects of program administration by the Director of Affirmative Action. The support staff shall possess sensitivity and awareness relative to the various ways in which discrimination occurs, with extensive knowledge and experience in civil rights precepts, policies, rules, regulations and guidelines.

The Civil Rights Officer, in conjunction with appropriate staff, shall be responsible for:

- Planning, developing and implementing AA policies involving budget, personnel, recruitment, contract compliance and consultant contracts;
- Conducting quarterly audits of hiring and promotion patterns and training programs, in order to remove barriers to AA goals and objectives;

- Submitting Reduction in Force proposals to the State Director of ODEO;
- Reviewing EOT's budget and policies to ensure EO/AA for protected groups and to recommend ways to prevent possible adverse impact on these groups;
- Holding monthly meetings with appointing authorities to review progress toward AA goals;
- Participating in all programs pertinent or particular to EOT that may impact on protected group members, especially in the area of the policy and procedure development (i.e., training, recruitment, classification, etc.);
- Scheduling confidential meetings with employees who request information on EOT policies (i.e., promotions, training, etc);
- Holding periodic meetings and discussions with managers and supervisors to advise them of their responsibilities and accountability in the area of AA;
- Reviewing the progress of AA goals to ensure implementation of EOT AA policies;
- Meeting with protected group member organizations and other organizations concerned with issues of importance to members of protected groups;
- Monitoring and reviewing, where appropriate, the qualifications of all employees to assure that protected group members are given full opportunities for training and promotion;
- Implementing Persons with Disabilities and Vietnam Era Veterans Programs, as well as the Resolution Process;
- Utilizing all means authorized by all applicable laws, regulations and executive orders, which are necessary and appropriate for carrying out the Plan.
- Recommending approval or disapproval and signing off on all appointments and personnel requisitions and layoffs;
- Reporting disapprovals to the State Director of ODEO, as defined in Executive Order 227;
- Reporting to the State Director of ODEO any problems that s/he experiences in enforcing and administering EOT's Plan, as defined in Executive Order 227.

### **3.2.2 STAFF RESPONSIBILITIES**

The Civil Rights Officer is assisted by EOT staff, as required, which are assigned specific responsibilities with respect to EO/AA.

The individuals listed below are responsible for the areas noted. In the event of information or staffing changes, the Civil Rights Officer shall communicate such changes in writing to ODEO and the appropriate federal authority as required:

The **Director of Human Resources** is responsible for the development of an appropriate mechanism to ensure that protected class individuals are informed of employment opportunities within EOT and that recruitment sources for protected groups are fully utilized for vacancies.

George Reed, Director of Human Resources (617) 973-7166

The **General Counsel** provides legal counsel on EO/AA issues to the Civil Rights Compliance staff and any other staff.

David Veator, General Counsel, (617) 973-7813

Additional AA responsibility specifically falls to the following individuals:

<b>AA RESPONSIBILITY</b>	<b>NAME</b>	<b>TITLE</b>	<b>PHONE</b>
ADA (Americans with Disabilities Act) Coordinator	Juan Flores	Director, AA	(617) 973-7281
Chief Financial Officer	Susan Bristol	Undersecretary	(617) 973-7404
Contract Compliance Director	Miguel Fernandes	Director, Contract Compliance	(617) 973-7139
Minority Business Enterprise Coordinator	Angela H. Rudikoff	Director, OCR	(617) 973-7024
Recruitment Coordinator	Lynne Heard	Outreach Recruiter	(617) 973-7829
Sexual Harassment Officers	Angela H. Rudikoff Juan Flores Christopher Groll	Director, OCR Director, AA Director, OLR	(617) 973-7024 (617) 973-7281 (617) 973-7159
Vietnam Era Veteran Coordinator	Juan Flores	Director, AA	(617) 973-7281

**Supervisory/Managerial Personnel**

Managerial personnel, in day-to-day contact with OCR staff, are assigned major responsibilities to ensure compliance with equal employment opportunity policies and to implement affirmative action programs within their areas of supervision. It is the responsibility of supervisory and management personnel to help implement the Plan where appropriate. In their role as supervisors, they will provide assistance to the Civil Rights Officer including, but not limited to:

- Understanding that the evaluation of their work performance is based, in part, on their equal employment opportunity efforts and results, as well as other criteria;
- Informing OCR staff of job needs and openings;
- Ensuring that protected group members are provided with EO for hiring, training, promotion, transfer, career counseling and reasonable accommodation;

- Ensuring that all employees are given full opportunities for transfers and promotions;
- Preventing any harassment of employees who are placed through Diversity/Equal Opportunity efforts or who utilize their rights pursuant to the Plan;
- Assisting in the investigation and resolution process of complaints alleging discrimination;
- Assisting in efforts to recruit a diverse workforce, including participation in career fairs;
- Proactively encouraging workforce diversity and employee awareness and acceptance of each other's differences and potential contributions. Managers and supervisors are also expected to exhibit exemplary behavior in treating all employees with equal respect.
- Detecting and addressing discriminatory behavior by taking appropriate preventive and/or remedial action.
- Assisting the OCR in identifying and eradicating barriers to equal opportunity within their departments.

#### **4.0 IDENTIFICATION OF PROBLEM AREAS**

EOT shall adhere to basic EO/AA concepts for employment policies and practices. The EO/AA concept applies to procedures for outreach recruitment, record-keeping, and any training and self-evaluation plans that may be required by such laws. Specifically, all employment policies, practices, and procedures including recruitment, hiring, transfer, promotion, compensation, training, layoff, discipline, downgrading, termination and recall will comply with the spirit and the letter of all applicable federal and state laws.

The Civil Rights Officer will be involved in personnel decisions as required herein. Records of all personnel decisions will be kept for review, including within OCR.

EOT shall identify barriers to equal advancement opportunities for all persons covered by the Plan and initiate remedial action when needed.

#### **4.1 WORKFORCE**

The EOT workforce was analyzed for its representation of women, minorities, Vietnam-era veterans and persons with disabilities within each EEO-4 job category. The EEO-4 classification system contains eight categories of personnel: official administration, professional, technical, protective services (sworn), protective services (non-sworn), administrative support, skilled craft and service maintenance. All job titles are placed in job groups according to job content, wage rates, and opportunity for advancement. Statistics of race, gender, ethnic origin, status as a Vietnam-era veteran, and status as an individual with disabilities are based on information voluntarily disclosed by employees.

*Table 1: Workforce Representation of Protected Group Members by EEO-4 Category*, outlines the representation of protected group members by EEO-4 job category. The workforce data in Table 1 includes the Executive Office, MHD, RMV and MAC. EOT workforce consists of 2815 employees. Of the total workforce, women constitute 34.7%, minorities 18%, Vietnam-era veterans 6.3%, and self-identified persons with disabilities 1.8%.

**Table 1: Workforce Representation of Protected Group Members by EEO-4 Category**

EEO-4 Category	Total		Female		Minority		VEV		Disabled	
	#	#	%	#	%	#	%	#	%	
Official Administrators	187	73	39.0	19	10.2	10	5.3	0	-	
Professional	1522	300	19.7	233	15.3	101	6.6	19	1.2	
Technical	219	75	34.2	36	16.4	14	6.4	4	1.8	
Protective Service (sworn)	1	0	-	0	-	0	-	0	-	
Protective Service (non sworn)	0	0	-	0	-	0	-	0	-	
Administrative Support	633	528	83.4	191	30.2	1	0.2	8	1.3	
Skilled Craft	157	1	0.6	15	9.6	33	21.0	14	8.9	
Service Maintenance	96	1	1.0	11	11.5	19	19.8	5	5.2	
<b>TOTAL</b>	<b>2815</b>	<b>978</b>	<b>34.7</b>	<b>505</b>	<b>17.9</b>	<b>178</b>	<b>6.3</b>	<b>50</b>	<b>1.8</b>	

**4.2 APPLICANTS**

EOT shall consider the composition of applicant flow by minority group status and gender. EO guidelines and AA intentions will be considered before positions are filled externally, as well as when promoting or assigning staff to different positions.

**4.3 SELECTION PROCESS**

EOT shall review the selection process, including position descriptions, position titles, specifications, interview procedures, referral procedures, final selection and similar factors. Interviewers shall uphold EOT’s high standard of professionalism. For any position opening, interviewers will use the same objective, job-related questions for all applicants. EOT maintains records of the interview questions. EOT follows the guidelines set by ODEO for the interviewing individuals with disabilities.

**4.4 PROMOTIONS**

EOT shall review its promotional procedures and methods of assigning staff to different positions.

**4.5 HIRING**

EOT shall analyze all job categories by race, sex, disability and Vietnam Era Veteran status for the past fiscal year to determine where new employees have been placed.

EOT considers EEO policy and applicable AA goals in each hiring decision. Positions are reviewed regularly to assure that all pre-requisites and hiring standards are job-related, reasonable, uniform and objective.

**4.6 OTHER ACTIVITIES**

EOT and its agencies shall review all technical aspects of compliance and take appropriate action to address problem areas identified therein.

## 5.0 DEVELOPMENT AND EXECUTION OF ACTION-ORIENTED PROGRAMS

EOT's offices of Civil Rights and Human Resources ("HR") shall work together to make substantial progress in each of the following areas:

1. Increase representation of women and minorities in the official administration positions, particularly in upper management.

*Action:* EOT shall post management positions throughout the organization and externally through universal postings. It will also continue to strengthen its relations with minority and female organizations to recruit qualified applicants.

*Action:* EOT shall make a concerted effort to recruit minority and women professionals and administrators for hiring and/or promotion to management or upper management positions.

*Action:* EOT shall encourage employees to take advantage of training opportunities offered internally or through the Human Resources Division ("HRD") to increase their eligibility for promotion.

2. Improve retention of protected group members in the overall workforce.

*Action:* EOT shall monitor personnel actions closely. OCR, in conjunction with HR, shall identify methods to better facilitate the analysis of employee retention.

*Action:* EOT shall review employee training patterns to ensure that protected group members are aware of opportunity to increase their skills and eligibility for promotion.

*Action:* EOT, in cooperation with HRD, shall activate the civil service list for all labor series titles, including Maintenance Equipment Operator, to promote employees from current laborer job titles.

*Action:* EOT shall conduct diversity training for all staff.

3. Increase protected group member representation in the overall workforce.

*Action:* EOT shall continue, and increase wherever possible, the recruitment of minorities and women.

*Action:* OCR shall work with HR to coordinate efforts and maximize results.

*Action:* EOT shall continue its attendance at college career and diversity job fairs, and expand its outreach efforts to union halls and targeted community groups.

*Action:* EOT shall activate the civil service list for all labor series titles, including Maintenance Equipment Operator, for new hires with cooperation from HRD.

*Action:* OCR will inform the Secretary on its progress toward attaining its affirmative action goals by presenting a monthly update.

## **5.1 RECRUITMENT AND OUTREACH**

EOT is committed to working with HRD in order to review job prerequisites and to determine the validity of job requirements. All efforts will be made to ensure that the skill requirements are job-related, and are consistent with business necessity and the safe performance of the job. EOT shall consider all qualified applicants for all job categories.

Notification of a position vacancy shall be given to the Civil Rights Officer at least five (5) working days prior to advertising or circulation of an advertisement seeking candidates to fill the vacancy.

To fill non-civil service job classifications, the Civil Rights Officer shall utilize all available sources to reach protected group members. Where there is underutilization of minorities, women, persons with disabilities or Vietnam Era Veterans in any job category, vigorous recruitment efforts shall take place to locate candidates to achieve diversity objectives.

Position vacancy notices shall be posted for a minimum of ten (10) working days and circulated to organizations that serve persons covered by this Plan. When appropriate, media advertising will be utilized, including the use of minority media. Each position vacancy notice shall include the statement:

"AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EMPLOYER"

Sources of recruitment include, but are not limited to:

- The Commonwealth Employment Opportunities (CEO) website, located at: [http://www.hrd.state.ma.us/employment/commonwealth\\_emp\\_opportunities.htm](http://www.hrd.state.ma.us/employment/commonwealth_emp_opportunities.htm)
- Department of Employment and Training job bank referral office.
- Placement offices at colleges and universities with required programs.
- Advertisements in publications for minorities, women, Vietnam Era Veterans and persons with disabilities.
- Community organizations located in areas where protected group members reside or frequent.
- Contacts with protected group members working in the respective field or related fields.
- Contacts with community organizations concerned with issues which affect protected group members.

All unions representing EOT employees will be asked to refer qualified persons covered by this Plan.

For Civil Service classifications, protected group members shall be notified of job openings, and are encouraged to review the CEO website. When there is underutilization of minorities or women in any job category, EOT must consider requesting that HRD apply the provisions of Personnel Administration Rule (PAR) 10. Use of this rule enables a special civil service list to obtain access for minorities or women.

The Recruitment Coordinator will maintain an active listing of recruiting sources. A continuous effort will be made to use, expand and update the list. It is expected that a reasonable percentage of the applicant pool for any job will be composed of protected group members. A record shall be maintained of the applicants who have applied and have been interviewed for a position, using information provided through voluntary self-identification, showing race, gender, certified Vietnam Era Veterans and disability status.

## **5.2 SELECTION**

EOT shall regularly review job descriptions, specifications and classifications to eliminate any artificial barriers.

Specifications for each job title will use only requisite job performance criteria. The specifications are nondiscriminatory with respect to race, color, religion, gender (except where gender is a bona fide occupational qualification) and national origin.

Position descriptions and employee specifications are available to all members of management involved in the recruiting, screening, selection and promotion processes.

EOT shall ensure that its selection process remains nondiscriminatory. Interviewers will be notified that they are to restrict their questions during the interview to topics that relate clearly to expected job performance. Interviewers will be cautioned to use the same set of objective questions for protected group members that they use for all others. Records will be kept of the questions asked during the interview.

## **5.3 HIRING**

The Civil Rights Officer shall have sign-off authority on all appointments. All hiring standards shall be fixed, reasonable, objective and job-related. Using information provided through voluntary self-identification, a record shall be maintained of the applicants who have applied and have been interviewed for a position, showing race, gender, certified Vietnam Era Veterans and disability status.

In cases of underutilization, if a member of a protected group is not hired, a reason for this shall be supplied. A description of the qualifications that are important or necessary for the performance of the job, and the basis on which these qualifications were determined to be important or necessary, will be noted.

Records pertaining to self-identified persons with disabilities shall be maintained in a separate, confidential file within the ADA Coordinator's office, except as allowed under all applicable statutes, regulations and executive orders.

Hiring records shall include the following information:

Fully signed Appointment Authorization Form and Selection Package, with:

- A. Name of selected candidate
- B. Name of each applicant who was interviewed
- C. Position title
- D. Position number
- E. Department/Agency
- F. Location (address)
- G. Date vacancy occurred
- H. Date position was requested
- I. Starting date of new position
- J. Justification for hiring selected candidate
- K. Self-identified race, sex, disability status and Official Certification Number for Vietnam Era Veterans of all applicants.

## **5.4 EMPLOYEE TRAINING**

During the period covered by this Plan, the Civil Rights Officer and Director of Human Resources, in collaboration with appropriate staff, will ensure that all employees attend a Diversity Training Program that enhances respect for diversity in the workplace and has been sanctioned by ODEO.

EOT shall update and implement career development plans for each employee and develop and conduct timely training programs, including Diversity in the Workplace, Sexual Harassment, The Americans With Disabilities Act, AIDS in the Workplace, and other programs as deemed necessary.

The Civil Rights Officer shall ensure that protected group members who are already employed in EOT are informed of opportunities and programs for training and career development.

Supervisors shall notify all employees of opportunities for training and career development either by posting the relevant information in a conspicuous location, through direct memo or by conducting individual and/or EOT-wide training sessions.

In order to ensure that protected group members are participating in training and career programs, records shall be kept at OCR of those receiving training and tuition reimbursements, and shall include information on the race, sex, disability and/or Vietnam Era Veteran status of the training participants.

## **5.5 PROMOTIONS**

EOT shall consider EO guidelines, as well as the purpose of an AA program when promoting or assigning staff to different positions, or filling positions externally, to ensure that a fair promotion procedure is established which benefits all employees.

Job openings and job requirements shall be posted in a conspicuous place. Unless otherwise approved by HRD, postings will be required of all positions for at least ten (10) working days in advance of the application deadline for all positions in order to ensure that all employees are aware of job vacancies.

## **5.6 DISCIPLINE**

All disciplinary actions shall comply with the Plan. When protected group members are disciplined and/or downgraded, the action shall be reviewed by the Civil Rights Officer to determine if such action represents a cause for intervention and/or remedial action.

EOT's records of all disciplinary actions shall contain any self-identified reference to race, sex, disability status and/or Vietnam Era Veteran status, the formal charges, findings, and sanctions imposed.

## **5.7 TERMINATION/DISCHARGE**

All termination/discharge procedures shall comply with EOT's policies. When protected group members are terminated, the action shall be reviewed by the Civil Rights Officer to determine if such action represents a cause for intervention and/or remedial action.

EOT's records of all terminations shall contain any self-identified reference to race, sex, disability status, and/or Vietnam Era Veteran status, the formal charges, findings, and sanctions imposed.

## **5.8 LAYOFFS**

In case of layoffs, employees shall be laid off on a nondiscriminatory basis so that EO principles are maintained. EOT has broad discretion in identifying programs and functions for elimination and/or reduction. The Redeployment/Layoff Procedures issued by ODEO shall be followed. As such, it is important that the Civil Rights Officer be an integral part of the planning process at the outset. The process will be monitored at EOT to identify patterns of adverse impact on protected group members and to ensure that EO/AA laws, rules and regulations are followed, so as to minimize potential negative impacts.

If the Civil Rights Officer identifies a potential for disproportionate impact on any protected group in any EEO-4 job category, that information shall immediately be reported in writing to the Appointing Authority. The Appointing Authority shall require the Directors of OCR, HR and the Office of Labor Relations (“OLR”) to meet jointly to explore alternatives. If the identified matter remains unresolved, EOT shall immediately notify the Civil Rights Officer and ODEO of the anticipated disproportionate layoff impact(s).

All layoff notices will inform employees of their right to appeal layoff decisions to the Office of Employee Relations (“OER”), ODEO, the Massachusetts Commission Against Discrimination (“MCAD”) or other forums as appropriate.

## **6.0 SECRETARIAT RESOLUTION PROCESS**

### **6.1 GENERAL POLICY**

EOT is committed to providing the opportunity for any protected group member to voice and resolve any alleged infringement of Equal Opportunity or Affirmative Action rights that are assured through state or federal laws, executive orders and/or guidelines. Accordingly, EOT has established a uniform grievance procedure that is known as the Resolution Process.

The Resolution Process may be used for allegations of adverse impact, maltreatment or harassment based on race, color, national origin, ancestry, sex, sexual orientation, disability or status as a Vietnam Era Veteran; allegations of failure to make reasonable accommodation for a person’s disability; and/or any and all other issues arising from relevant laws and related to this Plan.

A person who chooses to use the Resolution Process is not precluded from filing a complaint or grievance with any other appropriate agencies or authorities. Anyone using the Resolution Process shall be informed that any discovered information that could constitute a violation of anti-discrimination laws should be referred to the MCAD, the Equal Employment Opportunity Commission (“EEOC”) and/or other appropriate state or federal authority.

### **6.2 PROCEDURE**

The Civil Rights Officer is responsible for implementing and monitoring EOT’s Resolution Process. While doing so, s/he makes and preserves records of complaints, and ensures that applicable laws, regulations and rules concerning confidentiality and privacy are respected. The Resolution Process shall be made available to all employees through a posting on EOT’s Intranet.

## **7.0 ORGANIZATIONAL PROFILE**

### **7.1 WORKFORCE ANALYSIS**

The EOT workforce was analyzed for the representation of protected groups. Within each agency, each job title was reviewed to identify the total number of incumbents, the total number of male and female incumbents, and the total number of male and female incumbents who are Black, Hispanic, American-Indians or Alaskan natives, and Asian or Pacific Islanders. Additionally, a salary range for each job title has also been supplied. (Please see Appendix A - Form 1: WORKFORCE ANALYSIS AAP FORM, attached hereto.)

### **7.2 JOB GROUP ANALYSIS**

A listing of all job groups within the Executive Office is provided in the attached Job Group Analysis, which lists the job titles in each job group and the percentage of minorities and women encumbering each job group. Those jobs having similar content, wage rates and opportunities are grouped together. As a result, the Executive Office has twenty-six (26) employees grouped into three (3) job groups, including the following: Administrator, Professional and Clerical.

MHD is composed of a total of 1901 employees. The attached Job Group Analysis itemizes the job titles in each job group having similar content, wage rates and opportunities, and the percentage of minorities and women encumbering each job group. As a result, there are nineteen (19) identified job groups, including: Administrator, Civil Engineer, Chemist, Electrical Engineer, Environmental Analyst, Environmental Engineer, Transportation Planner, Information System Support, Account/Auditors, Administrator Professional (not elsewhere classified), Engineer Technicians, Administrative Support, Skilled Foreperson, Mechanic, Equipment Operator, Helpers/Construction, Highway/Maintenance/Construction.

RMV is composed of a total of 871 employees. The attached Job Group Analysis itemizes the job titles in each job group having similar content, wage rates and opportunities, and the percentage of minorities and women encumbering each job group. As a result, there are six (6) identified job groups, including: Administrator, Professional, Protective Service, Technician, and Clerical, and Service Maintenance.

MAC is composed of a total of ten (10) employees. The attached Job Group Analysis itemizes the job titles in each job group having similar content, wage rates and opportunities, and the percentage of minorities and women encumbering each job group. As a result, there are six (6) identified job groups, including: Administrator, Accountant, Civil Engineer, Aeronautical Inspector, Transportation Program Planner, and Clerical.

(Please see Appendix A - Form 2: JOB GROUP ANALYSIS AAP FORM and Form 3: TWO-FACTOR ANALYSIS AAP FORM, attached hereto).

### **7.3 PLACEMENT GOALS**

To address the under-utilization of women and minorities, the Executive Office of Transportation has set goals for the representation of women and minorities for each job category for the next fiscal year. *Table 2: Placement Goals by Agency*, outlines the placement goals by job group for each agency in EOT where underutilization has been identified. The attached Placement Goals Analysis Form balances organizational representation of minorities and women against availability adjusted in the two factor analyses.

(Please see attached Form 4: PLACEMENT GOALS ANALYSIS AAP FORM).

## **PROGRAM FOR PERSONS WITH DISABILITIES**

### **GENERAL POLICY**

EOT is committed to providing persons with disabilities with equal employment opportunity. In addition to the intrinsic social benefits, EOT recognizes that employing persons with disabilities and their skills is advantageous to EOT's operational efficiency. EOT will act affirmatively to increase employment opportunity for persons with disabilities.

The Americans with Disabilities Act ("ADA") defines an individual with a disability as any person who has a physical or mental impairment that substantially limits one or more major life activities, has a record of such impairment or is regarded as having such impairment. EOT invites all qualified employees and applicants to self-identify as persons with disabilities. No employee is counted in EOT's workforce analysis as a person with a disability unless s/he has completed the process of self-identification, verification, and confirmation established by ODEO. (Please see Appendix B for the Self-Identification forms.) EOT self-identification records are kept confidential to the highest extent required by law.

### **PROGRAM**

In addition to the programs described in the foregoing Plan, EOT will continue to:

1. Ensure that all applicants and employees are treated equitably, and evaluated according to their qualifications, and not mental or physical characteristics.
2. Provide information and awareness training on disability-related issues to supervisors and interviewers.
3. Ensure that all job requirements are essential and job-related.
4. When an opening arises, notify current EOT employees with disabilities of the opportunity for promotion.
5. Provide reasonable accommodation in all areas of accessibility.

### **REASONABLE ACCOMMODATION**

In accordance with all applicable laws, EOT makes reasonable accommodations to the physical and mental limitations of persons with disabilities in employment and in access to its programs. It seeks to remove barriers that prevent or limit employment opportunities for eligible disabled persons. Accommodation includes, but is not limited to: workplace access; modified equipment and support devices; modified work schedules; and provision of support services, such as readers and interpreters. EOT grants appointments and promotions based on a candidate's ability to perform the duties of the position, with or without a reasonable accommodation. EOT makes all accommodations that are reasonable and do not impose an undue hardship on EOT's programs.

## **PROGRAM FOR VIETNAM-ERA VETERANS**

### **GENERAL POLICY**

EOT will not discriminate against any employee or applicant for employment because s/he is a Vietnam-era veteran. In addition, EOT will take affirmative action to employ and advance Vietnam-era veterans in all levels of employment.

### **PROGRAM**

In addition to the programs described in the foregoing Plan, EOT will continue to:

1. Invite all employees and applicants to identify themselves as Vietnam-era veterans. (Please see Appendix C for self-identification forms.)
2. Ensure that all Vietnam-era veterans have the opportunity to participate in all EOT-sponsored educational and training programs.
3. Ensure that compensation for salaried and non-salaried employees will be the same for all employees within a particular salary or wage code, without regard to military pension or disability benefits or any other source of income an employee or applicant may receive.
4. Review and evaluate EOT's employment practices to ensure nondiscrimination of Vietnam-era veterans.

Note: Please see Appendix D for the Policy for the Prevention and Elimination of Sexual Harassment in the Workplace.