

Metropolitan Atlanta Rapid Transit Authority 2022 Equal Employment Opportunity Plan



May 1, 2022 – April 30, 2026



Metropolitan Atlanta Rapid Transit Authority

Equal Employment Opportunity Plan

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PREFACE

The Metropolitan Atlanta Rapid Transit Authority (MARTA or the Authority) is fully committed to the concept, principles and practice of equal opportunity in all aspects of employment. Equal Employment Opportunity and engaging a highly qualified diverse workforce are central to MARTA's strategic goals, business objectives and core organizational values. The Authority's creation and execution of equal employment plans satisfy regulatory compliance requirements and additionally assist with building and monitoring the progress of programs which enhance equity, sustain diversity and promote inclusion across all sectors of MARTA's workforce.

In preparation of MARTA's Equal Employment Opportunity Plan (EEO), 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," "concentration", "goal", "problem area", etc., should not be construed as an admission by MARTA, 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 this EEO or its supporting data should be construed as an admission by MARTA, in whole or in part, that it has contravened such federal, state or local employment practice laws.

In developing and implementing this EEO, MARTA has been guided by an established policy of providing Equal Employment Opportunity. Any placement goals that have been established herein are not intended as rigid, inflexible quotas that must be met, but rather as targets reasonably attainable by applying every good faith effort in implementing this EEO. The use of placement goals is not intended, nor is the effect of such placement goals intended, to discriminate against an individual or group of individuals with the respect to any employment opportunities for which he, she, or they are qualified because he, she, or they are not the beneficiaries of affirmative action themselves. Nothing herein is intended to sanction the discriminatory treatment of any person. Employment decisions at MARTA are made based on objective job-related criteria and implementation of this EEO will comply with applicable local, state and federal laws, statutes and guidelines for non-discrimination in employment.

This Equal Employment Opportunity Plan has been developed in strict reliance with the guidelines on Affirmative Action issued by the Equal Employment Opportunity Commission (EEOC) (29 C.F.R. Part 1608), the Department of Transportation and the Federal Transit Administration.

EXECUTIVE SUMMARY

The Metropolitan Atlanta Rapid Transit Authority (MARTA or the Authority) is a transit agency that employs over 50 transit-related employees and receives Federal capital and operating assistance of more than one million dollars. MARTA also receives planning assistance of more than two hundred and fifty thousand dollars. Therefore, MARTA meets the Federal Transit Administration (FTA) threshold and must submit an EEO Plan Update to the FTA every four years. MARTA's Equal Employment Opportunity Plan fulfills FTA regulatory compliance requirements for affirmative action planning applicable to federal fund recipients and further complies with Department of Transportation (DOT), Federal Transit Administration (FTA) Civil Rights requirements set forth in (FTA) Circular 4704.1 (July 26, 1988) and other federal, state, and local regulations and laws prohibiting discrimination. This EEO Plan updates MARTA's 2018-2022 EEO Plan consistent with (FTA) Circular 4704.1.

The Office of Diversity and Inclusion has been assigned the responsibility of preparing MARTA's 2022 EEO Update. Under the direction of the General Manager and CEO, this office is charged with the development, implementation, coordination, and monitoring of all equal opportunity, affirmative action and civil rights programs required by Federal Regulations, Company and Board Policies.

MARTA's 2022 EEO Plan formalizes the Authority's commitment to diversity and equal employment opportunity. It demonstrates MARTA's efforts to monitor the composition of its EEO occupational categories and its overall workforce by racial, ethnic, and gender classifications. In addition, the plan demonstrates MARTA's efforts to identify and correct areas of underutilization. MARTA takes specific steps to eliminate unlawful discrimination, as well as the effects and appearance of unlawful discrimination. The equal employment steps taken by MARTA ensure that company policies, practices, and programs facilitate non-discriminatory efforts to establish and maintain a workforce that reflects the availability of minority and female individuals ready, willing and able to work. Additionally, the 2022 EEO Plan will be utilized as a management tool to build, improve, implement and monitor compliance and inclusion programs.

MARTA's statement and reaffirmation of Equal Employment Opportunity is issued by the Interim General Manager and CEO, Collie Greenwood and is found in **Exhibit 1**. In keeping with this policy, MARTA continues to recruit, hire, train and promote the most qualified persons in all job titles without regard to race, color, religious creed, gender, national origin, age (40 and over), disability, ancestry, medical condition, marital status, sexual orientation, gender identity, gender expression, genetic information, military or veteran status or any other basis protected by federal or state statute.

All personnel matters such as compensation, benefits, transfers, terminations and tuition assistance continue to be administered in accordance with MARTA's commitment to equal opportunity and non-discrimination. MARTA continues to base employment decisions on job-related criteria to ensure adherence to equal employment opportunity principles.

MARTA'S SERVICE PROFILE

The **Metropolitan Atlanta Rapid Transit Authority (MARTA)** is the principal public transport operator in the Atlanta Metropolitan Area. Established in 1965 by the Georgia General Assembly as an independent single-purpose Authority, MARTA was designed to plan, construct, finance and operate public transit within the region. MARTA operates a network of bus routes linked to a rapid transit system consisting of 48 miles of rail track with 38 train stations, MARTA Mobility Para-transit and The Streetcar light rail system. It is the twelfth-largest rapid transit system in the United States by ridership.

MARTA's heavy rail rapid transit, light rail transit, and bus transit systems operate almost exclusively within the boundaries of Fulton, Clayton and DeKalb counties. In addition to Atlanta itself, the transit agency serves various suburbs within its service area, including Alpharetta, Avondale Estates, Brookhaven, Chamblee, Clarkston, College Park, Decatur, Doraville, Dunwoody, East Point, Ellenwood, Fairburn, Forest Park, Hapeville, Jonesboro, Lake City, Lovejoy, Lithonia, Morrow, Palmetto, Riverdale, Roswell, Sandy Springs, Stone Mountain, and Union City. MARTA also serves the airport via a station located next to the main terminal. Although Cobb County is not part of the MARTA system, the agency operates one bus route to the Cumberland Boulevard Transfer Center and another to Six Flags Over Georgia. MARTA also operates a separate paratransit service for disabled customers. The FY21 annual average weekday ridership for the system (bus and rail) was 143,000 passengers.

The MARTA rapid heavy rail system extends 48 miles and operates 312 rail cars out of 38 rail stations located on four service lines: the Red Line (formerly the North-South Line), the Gold Line (formerly the Northeast-South Line), the Blue Line (formerly the East-West Line), and the Green Line (formerly the Proctor Creek Line). Tracks for this system are a combination of elevated, ground-level, and underground tracks. All rapid transit lines have an ultimate nexus at the Five Points station, located in downtown Atlanta. MARTA trains are operated using the Automatic Train Control system, with one human operator per train to make announcements, operate doors, and to operate the trains manually in case of a control system malfunction or an emergency.

MARTA's bus system serves a wider area than the rail system. As of June 30, 2021, MARTA's service covers 113 bus routes supported by a fleet of 539 buses operating over 25 million annual vehicle miles. All MARTA bus lines feed into or intersect MARTA rail lines as well.

In compliance with the Americans with Disabilities Act (ADA), MARTA provides paratransit services (MARTA Mobility) for those persons defined as disabled by the ADA. MARTA Mobility uses 240 special lift-equipped vehicles for this service, and can either deliver passengers to their final destination (curb-to-curb service) or can deliver the passenger to the closest accessible bus stop or rail station (feeder service). MARTA Mobility provides an average of 32,000 trips monthly.

The Streetcar is MARTA's light rail service, a modern streetcar route that is powered by overhead catenary and operates in mixed vehicle traffic. Operating on a 2.7-mile loop system in Downtown Atlanta, the system was constructed by the City of Atlanta and was integrated into MARTA operations on July 1, 2018.

In 2021, MARTA had 4,193 full and part-time employees, of whom 1,432 were bus or train operators. Rail and bus operators, the station agents, the rail maintenance workers, and many other employees of MARTA are represented in negotiations by the Amalgamated Transit Union's Local 732.

MARTA has its own police department with 265 badge-wearing officers, making it the ninth-largest police department in Georgia.

MARTA's EXECUTIVE STAFF PROFILE

MARTA is led by two groups of dedicated professionals, The Board of Directors and the Executive Management Team. The executive staff for the Metropolitan Atlanta Rapid Transit Authority is led by:

MARTA's Board of Directors

MARTA's Board is composed of 15 members: 12 members representing the City of Atlanta, Fulton County, DeKalb County, and Clayton County; 2 members representing the Georgia Regional Transportation Authority and the Georgia Department of Transportation; and 1 member appointed by the Governor. They meet regularly to address the latest issues of importance concerning ridership, safety, economics, new technology, government regulations and more.

The Board of Directors is comprised of five committees:

- Audit Committee
- Business Management Committee
- Operations and Safety Committee
- Planning and Capital Programs Committee
- External Relations Committee

MARTA's Executive Management Team

MARTA's Executive Management Team (EMT) is led by MARTA's Interim General Manager (GM)/Chief Executive Officer (CEO), Collie J. Greenwood, and his Chief Team consisting of the Interim Chief Operating Officer, Chief Counsel, Chief Financial Officer, Chief Administrative Officer, Chief of Staff, Chief Customer Experience Officer, Chief of Safety and Quality Assurance, and Chief of Capital Programs, Expansion and innovation. The EMT also includes leaders of MARTA Departments and the Executive Director of Diversity and Inclusion. Attached as **Exhibit 2** is the Executive Leadership Organizational Chart.

Through their commitment to Equal Employment Opportunity (EEO) and the EEO Program, the MARTA Board of Directors, the General Manager/CEO and the Executive Management Team set EEO standards and model Authority wide compliance expectations.

EQUAL EMPLOYMENT OPPORTUNITY PROGRAM

The following information is intended to meet the EEO reporting requirements set forth in (FTA) Circular 4704.1.

STATEMENT OF POLICY

An essential component of MARTA'S EEO Program is a comprehensive policy and procedure prohibiting discrimination and harassment in the workplace based on EEO protected status. MARTA'S CEO issues an Equal Employment Opportunity Statement regarding EEO policy affecting all employment practices.

MARTA'S Office of Diversity and Inclusion is responsible for the implementation of this mandate. The Office of Diversity and Inclusion has made all MARTA employees aware of its commitment to EEO by posting the EEO statement of policy in all the Authority's facilities, and on its website. The EEO Statement of Policy is found in **Exhibit 1**.

DISSEMINATION PLAN

An effective EEO Program requires that it be known and understood by persons responsible for its administration, employees, recruitment sources, subcontractors, vendors, suppliers, and the community-at-large. MARTA has established various channels of communication to ensure that employees and the community are aware of its commitment to EEO policies and procedures.

MARTA widely publicizes and disseminates its EEO Policy Statement and associated documents to employees, subcontractors, applicants, and potential applicants, both internally and externally. EEO materials are available in both print and electronic formats and can be found posted on bulletin boards throughout the workplace, as well as on the Authority's website.

Internal Dissemination

1. MARTA's EEO Policy Statement, signed by the GM/CEO, is disseminated throughout the Agency in both print and electronic formats.
2. The Authority's EEO Policy Statement, along with federal and state labor law notices, are prominently displayed on bulletin boards, in employee break rooms and other common workspaces throughout the Authority's facilities.
3. The Authority's EEO Policy Statement is available on MARTA's intranet and is posted on the Office of Diversity and Inclusion webpage.
4. The Executive Director of Diversity and Inclusion provides periodic briefings to top management (semiannually) and the Board of Directors on the EEO Program.
5. All new employees receive EEO training and are informed of MARTA's EEO policies during new employee orientation sessions. Managers are required to take EEO training. Employees periodically take refresher EEO training. All employees sign a form acknowledging that they have been informed of MARTA's EEO policies.
6. An electronic roster is kept for all employees regarding their attendance at MARTA training sessions, including EEO training.

External Dissemination

1. MARTA's Office of Diversity and Inclusion (ODI) regularly partners with organizations such as the Georgia Hispanic Construction Association, National Association of Asian American Professionals, Japan American Society of Georgia, National Black MBA Association, Disability Link, and the Georgia Diversity Council to promote the diversity of its workforce. When doing so, MARTA regularly disseminates its EEO policies to these organizations.
2. All recruitment advertisements, on all platforms from newspapers to on-line job postings, state that MARTA "is an equal opportunity employer." (**Exhibit 3**)

DESIGNATION OF PERSONNEL RESPONSIBILITY

Although the Office of Diversity and Inclusion leads the development, coordination and effectuation of the Authority's EEO Program¹, there are numerous departments that have collaborative and supportive EEO program responsibilities. This supports MARTA's belief that that Equal Employment is an organizational responsibility.

The importance MARTA places on the EEO Program and Plan is demonstrated by MARTA Interim GM/CEO Collie Greenwood's affirmation in his EEO Statement of Policy (**Exhibit 1**). This statement of policy is posted on the agency's intranet, internet and in conspicuous workplaces throughout the agency.

EEO Program Responsibility and Accountability

General Manager/CEO – Collie Greenwood, has the ultimate responsibility for ensuring that Equal Employment Opportunity receive the highest level of priority. The GM/CEO responsibilities include, but are not limited to:

- a. Appointing the Executive Director of Diversity and Inclusion as the Authority's Chief EEO Officer.
- b. Delegating the responsibility for overseeing, administering, implementing, and monitoring the EEO Program to designated personnel;
- c. Ensuring that adequate funding, staffing and resources are provided to the Office of Diversity and Inclusion to successfully implement, monitor and manage EEO Plan and Program as mandated by the FTA;
- d. Imparting direction to the Executive Management Team that assures total involvement and commitment to Equal Employment Opportunity. Reviewing EEO Plan Goals with executive leaders and board members. Providing, supporting and enforcing EEO Plan goals throughout MARTA.
- e. Ensuring Board of Director alignment and support of EEO principles, plans and programming;
- f. Valuing and modeling the principles of Equal Employment Opportunities and Diversity and Inclusion by proactively promoting MARTA's EEO plan and related programs. Leading equality and diversity related initiatives.

Executive Director Diversity & Inclusion/Chief Diversity Officer – Paula Nash has been appointed by the GM/CEO as the Authority's Chief Compliance/EEO Officer. MARTA's Chief Compliance/EEO Officer has the primary and direct leadership responsibility and authority to ensure full compliance with the provisions of Executive Order 11246, as amended, and it's implementing regulations. The responsibilities of the Chief Compliance/EEO Officer include, but are not limited to²:

- a. Developing and administering MARTA's EEO Policy, a written EEO program and internal and external communication procedures;
- b. Providing updates on Civil Rights Compliance and EEO/AA Program goals and progress for every business unit with the General Manager/CEO, executive management team and Board of Directors. Keeps CEO abreast of new developments in EEO that may require amendments to MARTA policies.

¹ The Office of Diversity and Inclusion Organizational Chart is attached as **Exhibit 4**.

² Job descriptions for MARTA's EEO staff are provided in **Exhibit 5**.

- c. Ensuring that Office of Diversity and Inclusion designated personnel responsible for the EEO Plan and Program are provided with the staff and resources necessary to successfully implement, monitor and manage assigned responsibilities;
- d. Ensuring program effectiveness. Designing, implementing, and monitoring internal audit and reporting systems to measure program effectiveness and progress;
- e. Serving as liaison between the Authority, Federal, State and local governments, regulatory agencies. Serving as the Authority's chief representative with diversity and community organizations;
- f. Assuring that current legal information affecting equal employment is disseminated to responsible officials;
- g. Providing direction to the Human Resources Department regarding underrepresented groups and utilization goals. Advising the Human Resources Department's on diversity in employment practices. Ensuring the establishment of outreach sources. Concurring in the hiring and promotion process;
- h. Ensuring established investigations processes and management for EEO complaints.
- i. Designing and implementing an internal audit and reporting system that: 1) measures the effectiveness of the MARTA program; 2) determines the degree to which EEO Goals and Objectives are met; and 3) identifies the need for remedial action;
- j. The development of education and training programs to provide managers and supervisors with EEO-related information to assist them in their compliance efforts;
- k. Directs, interprets and enforces MARTA EEO policies, procedures and guidelines in compliance with state and federal law.

Assistant General Manager Human Resources – Calvin Wright. The Assistant General Manager for Human Resources is charged with supporting EEO Plan, program and policies established by the Office of Diversity and Inclusion. Primary supporting responsibilities include:

- a. Ensuring the establishment and ongoing effectiveness of employment programs, policies and practices that accomplish the goals and objectives of MARTA's EEO Plan for both applicants and MARTA employees.
- b. Ensuring the Authority's Human Resources Information Systems captures EEO related information for all individuals in MARTA's employment life cycle (applicant, hire, compensation, transfer, promotion, disciplinary, demotion and termination data).
- c. Advising employees and of available training programs and professional development opportunities, and advising applicants of entrance requirements.

Manager, Diversity and Inclusion – Adoraue Jouett. The Manager Diversity and Inclusion is responsible for leading the day to day management and execution of Civil Rights compliance and MARTA's EEO Programs, as follows:

- a. Manages the development, preparation and update of MARTA's EEO Plan. Collects and analyzes employment data. Sets goals and develops timetables and programs to achieve goals. Develops policy statements and new programs;
- b. Has direct oversight of MARTA's EEO complaint and investigation processes. Approves case determinations concerning any allegations of discrimination, both internally and in connection with regulatory agencies;

- c. Identifies and conveys problem areas along with recommended solutions, to the Executive Director Diversity and Inclusion and key organizational leaders;
- d. Assists with development, establishment and enforcement of MARTA goals and objectives;
- e. Assists employees with discrimination complaints;
- f. Assists in the development and facilitation of training programs to provide managers, supervisors, and employees with EEO information to assist them in their compliance efforts and daily workplace conduct;
- g. Guides and counsels MARTA leaders and employees on EEO related matters and MARTA's nondiscrimination plan;
- h. Reviews employment practices policies, complaint policies, performance evaluations process, reasonable accommodation policies, grievance procedures and union agreements; and
- i. Manages routine internal EEO audits to ensure MARTA's compliance with Title VII of the Civil Rights Act of 1964, and to ensure the Authority is positioned to execute an effective EEO Program.

Data Analytics Administrator – The Data Analytics Administrator replaces the Workforce Planning Administrator position present in MARTA's organizational structure during the preceding plan period. This position is responsible for monitoring the Equal Employment Opportunity Plan, monitoring the related program and reporting progress to management. The position implements components of the EEO Program and:

- a., Supporting automated systems and communication channels for EEO initiatives including the EEO Plan;
- b. Perform data and predictive analytics. Assists management in identifying problem areas;
- c. Assist and guide MARTA leaders in their management of EEO related matters;
- d. Ensure the proper display of up to date EEO posters, policies and policy statement; and
- e. Assist the Manager Diversity and Inclusion with EEO Program enhancements.

Managers and Supervisors – MARTA employees, at all managerial and supervisory levels, are responsible for ensuring that subtle and overt forms of discrimination are eliminated within their respective work areas by:

- a. Providing equal opportunity for promotions, transfers, and training to all qualified employees regardless of sex, including sexual orientation, race, color, ancestry, religious creed, national origin, physical disability (including HIV and AIDS), mental disability, medical condition, age (40 & over), marital status, veteran status or any other status protected by federal or state laws;
- b. Initiating, guiding, and taking necessary actions to implement equal employment opportunities at all grade levels;
- c. Ensuring nondiscrimination in any employment practice including, but not limited to, recruitment, selection, assignment, transfer, promotion, discipline, layoff, termination, compensation, benefits, social and recreational programs, training and commendation;

- d. Supporting MARTA's EEO policies by understanding the intent and goals of the EEO program, participating in EEO training, and assisting EEO staff in monitoring the progress of the EEO Plan; and
- e. Attending specific training on diversity, discrimination and the prevention of sexual harassment.
- f. Performing the following responsibilities to comply with the MARTA EEO Program:
 - 1. Identify problem areas that could prevent compliance with EEO goals and objectives;
 - 2. Cooperate with local minority organizations, women's and disability organizations, and community programs to promote equal employment opportunities;
 - 3. Participate in periodic audits of all aspects of employment to identify and remove barriers obstructing the achievement of specified goals and objectives;
 - 4. Hold regular discussions with other managers, supervisors and employees to ensure that MARTA EEO policies and procedures are followed;
 - 5. Review the qualifications of all employees to ensure that minorities, individuals with disabilities and women are given full opportunities for transfers, promotions, training, salary increases and other forms of compensation;
 - 6. Participate in the review and investigation of complaints alleging discrimination;
 - 7. Conduct and support career counseling for all employees; and
 - 8. Participate in audits to ensure compliance with EEO policies and EEO Plan.

WORKFORCE AND UTILIZATION ANALYSIS

The purpose of the Utilization Analysis is to identify those job categories where there is underutilization and/or concentration of certain demographic groups within MARTA's workforce, in comparison to their availability in the relevant labor market. It is also used to establish a set of goals and timetables to address any underutilization and/or concentration.

The Utilization Analysis consists of a workforce analysis and an availability analysis. The workforce analysis provides a statistical breakdown of MARTA's workforce by EEO-4 job categories, cross-referenced by gender and race/ethnicity. The availability analysis draws from US Census Bureau statistics on the demographics of the available workforce, primarily in the metropolitan Atlanta area, but also in the state of Georgia and the United States as a whole, for certain job categories.

Based on a comparison between the demographic profile of MARTA's workforce and the demographic profile of the available workforce, this analysis identified areas of underutilization and concentration. These figures were used as a baseline from which goals and timetables were developed.

Description of Data Sources

Workforce Data:

Workforce data is derived from MARTA's 2021 EEO-4 report (**Exhibit 6**), which accounts for a snapshot of the workforce on June 30, 2021. All full-time, part-time, permanent, and temporary MARTA employees are captured in the dataset for this Utilization Analysis. Contractors are not included in the data.

MARTA assigns similar or related job titles to job groups that mirror the EEO-4 job categories. As MARTA only categorized four employees as Paraprofessionals, data on these employees have been incorporated into the Administrative Support job category for the purposes of this analysis.

Availability Data:

MARTA obtained availability data from the U.S. Census Bureau's 2014-2018 American Community Survey. This analysis employs the EEO6w State and Local Government Job Groups by Gender, and Race/Ethnicity for Worksite Geography data tables. This is the most recent source of EEO tabulation data by State and Local Government job groups.

This analysis uses the same geographic areas as MARTA's 2022 EEO Program Report. The Authority elected to use the entire United States as the appropriate labor market for the Officials and Administrators job category. MARTA seeks and recruits candidates from throughout the U.S. for its executive management positions, due to the relatively small pool of people qualified to take on these senior management roles. For the Protective Service Workers job category, the Authority selected the entire state of Georgia as the supply area. Based on historical talent acquisition data, MARTA widens its search parameters to recruit enough candidates for this category. For the remaining job categories, this analysis uses the Atlanta-Sandy Springs-Alpharetta, GA Metropolitan Statistical Area (29 county area in north Georgia, hereinafter referred to as "Atlanta MSA") as the appropriate labor market. The Authority has historically been able to meet its hiring needs for these job categories by recruiting from the 2.7 Million population of the Atlanta MSA's labor force.

Findings

Total Workforce & Availability Analysis:

MARTA's total workforce, on June 30, 2021, comprised 4193 individuals. This figure includes all full time, part time, permanent, and temporary employees. Of the total workforce, 2564 employees were male, composing 61% of MARTA's workforce. 1629 employees were female, representing 39% of the workforce. 3882 employees were minorities, composing 93% of the workforce. 311 employees were Caucasian, representing 7.4% of the workforce (Figure 1).

Composing a total of 86% of MARTA's workforce, African Americans were highly represented in the Authority. In comparison, African American availability in the workforce in the Atlanta MSA is 31.8%. Neither male nor female African Americans were underutilized in any workforce category. African Americans were most highly represented in the Professionals (76%), Service-Maintenance (97%), Administrative Support (90%), and Protective Service (80%) categories.

There were 101 Hispanic/Latino males and 38 Hispanic/Latino females working at MARTA on June 30, 2021. Combined, Hispanic/Latino made up 3.3% of the Authority's workforce. This figure is considerably smaller than the 9.8% availability of Hispanic/Latino in the overall workforce in the Atlanta MSA. Hispanic/Latino males were underutilized in several job categories. These were Skilled Craft (18% underutilized), Service/Maintenance (9% underutilized), Officials and Administrators (5.7% underutilized), Technician (2.4% underutilized) and Administrative Support (1.3% underutilized). Hispanic/Latino females were also underutilized in five job categories. These were Service-Maintenance (5.5% underutilized), Technicians (2.5%

underutilized), Skilled Craft (2.0% underutilized), Administrative Support (2.3% underutilized) and Professionals (1.3% underutilized).

There were 95 Asian males and 17 Asian females employed at MARTA on the reporting date. Combined, Asians represented 3% of the workforce. This percentage is less than the 5.8% availability figures for Asians in the Atlanta MSA. Asian males were underutilized in four job categories. These were Officials and Administrators (1.8% underutilized), Service/Maintenance (2.1% underutilized), Professionals (1.9% underutilized) and Administrative Support (1.7% underutilized). Asian females were underutilized in most job categories. These were Officials and Administrators (2.6% underutilized), Technicians (2.9% underutilized), Service-Maintenance (2.5% underutilized), Professionals (2.5% underutilized), Skilled Craft (0.7%) underutilized, and Administrative Support (1.6% underutilized).

American Indians or Alaskan Natives represented 0.45% of MARTA's workforce. This figure is larger than the 0.14% availability of American Indians or Alaskan Natives in the overall workforce of the Atlanta MSA. This group is not underutilized in MARTA's workforce. (Figure 3).

The largest deficiencies amongst all demographic groups, and across most EEO-4 job categories, were Caucasian females.³ Caucasian females made up only 1.19% of the MARTA workforce, whereas they compose 23% of the available workforce in Atlanta MSA. Caucasian females were underutilized in all job categories. These were Professionals (29.2% underutilized as compared to 31.2% underutilized in 2017), Administrative Support (28% underutilized as compared to 30.9% underutilized in 2017), Technicians (16.5% underutilized), Officials and Administrators (14.6% as compared to 20.2% underutilized in 2017), Service-Maintenance (14.6% underutilized), Protective Service (8.0% underutilization), and Skilled Craft (2.6% underutilized as compared to 2.7% underutilized in 2017).

³ Caucasian males also have a large deficiency in MARTA's workforce, but since this group is not included in the FTA's definition of underutilization, it will not be individually addressed.

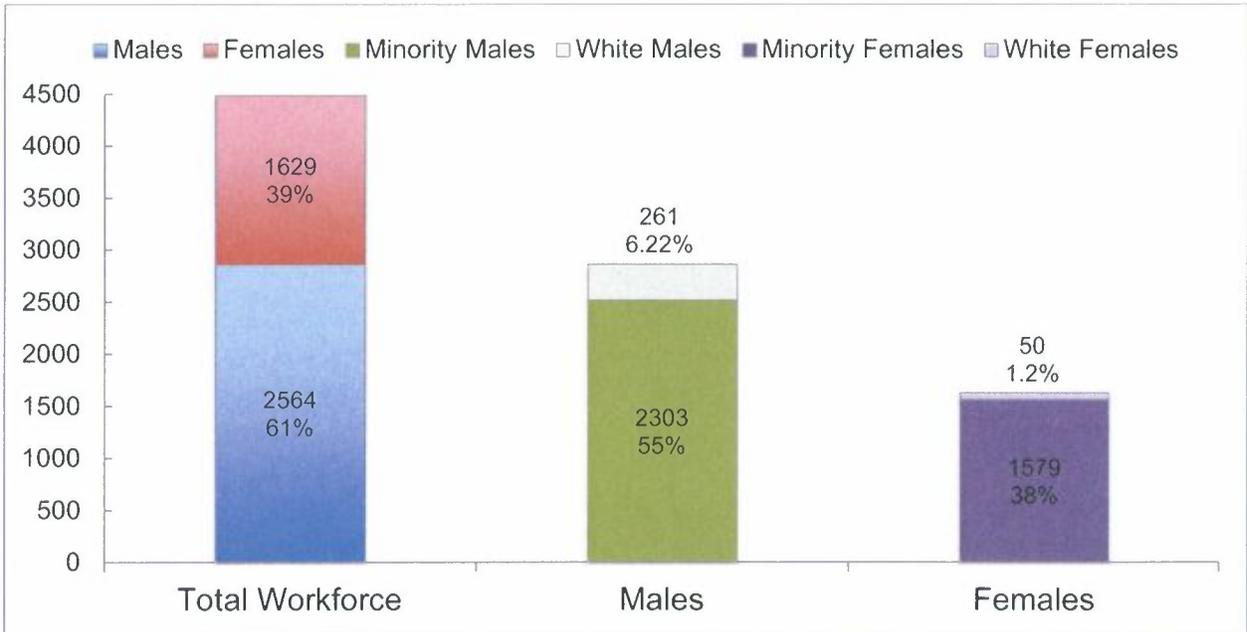


Fig. 1 - MARTA Workforce Snapshot
6/30/2021

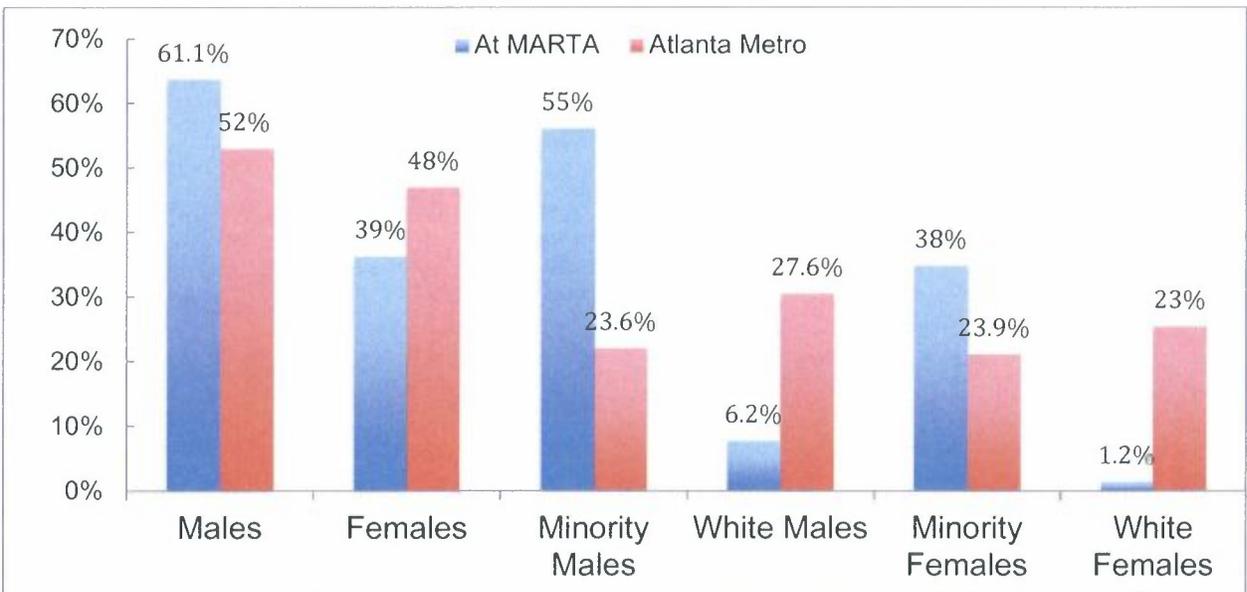


Fig. 2 - MARTA Workforce in Comparison to Workforce Availability in the Atlanta MSA
By Gender and Minority Status

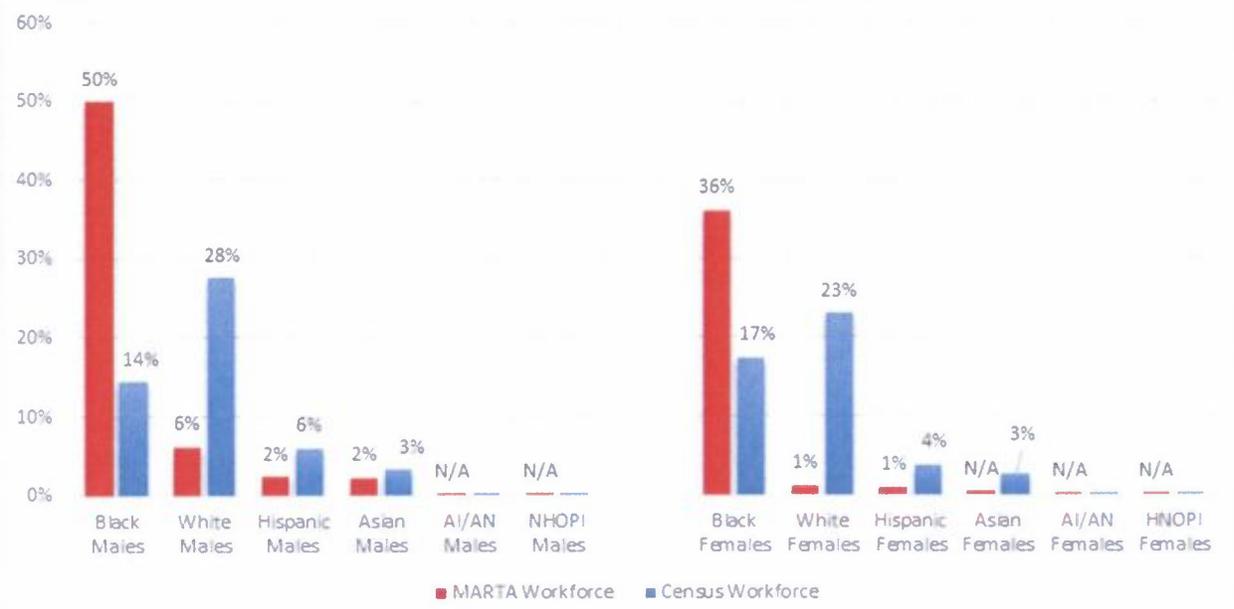


Fig. 3 - MARTA Workforce in Comparison to Workforce Availability in the Allanta MSA By Demographics

Job Group Analysis

Officials and Administrators

The Officials and Administrators job category contained 59 MARTA employees, with annual salaries ranging from approximately \$70,000 plus. Of these 59 employees, 34 (58%) were male, and 25 (42%) were female; 33 (56%) were minorities, and 26 (44%) were Caucasian.

Four protected class groups were underutilized in the Officials and Administrators job category. These include Hispanic/Latino males, Asian males and females, and Caucasian females.

Demographic	Underutilization
Hispanic/Latino Males	5.72%
Asian Males	1.8%
Asian Females	2.6%
Caucasian Females	14.5%

Professionals

There were 923 MARTA employees classified in the Professionals job category, with annual salaries ranging from approximately \$15,999 to \$70,000. Of these 923 employees, 584 (63%) were male, while 339 (37%) were female; 782 (85%) were minorities, and 141 (15%) were Caucasian.

Three protected class groups were underutilized in the Professionals job category. These include Hispanic/Latino females, Asian males and females and Caucasian females.

Demographic	Underutilization
Hispanic/Latino Females	1.3%
Asian Males	1.9%
Asian Females	2.5
Caucasian Females	29.2%

Technicians

The Technicians job category included 85 MARTA employees, with annual salaries ranging from approximately \$33,000 to \$70,000 plus. Of these 85 employees, 58 (68%) were male, while 27 (32%) were female; 71 (84%) were minorities, and 14 (16%) were Caucasian.

Four protected class groups were underutilized in the Technicians job category. These include Hispanic/Latino males and females, Asian females, and Caucasian females.

Demographic	Underutilization
Hispanic/Latino Males	2.4%
Hispanic/Latino Females	2.5%
Asian Females	2.9%
Caucasian Females	23.4%

Protective Service

There were 241 MARTA employees counted in the Protective Service job category, with annual salaries ranging from approximately \$33,000 to \$70,000. Of these 241 employees, 171 (71%) were male, while 70 (29%) were female; 224 (93%) were minorities, and 17 (7%) were Caucasian.

Only one protected class group was underutilized in the Protective Service job category. This was Caucasian females.

Demographic	Underutilization
Caucasian Females	8.0%

Paraprofessionals

MARTA placed only four employees in the Paraprofessional job category. As this number is too small to be statistically significant, for the purposes of this analysis, these four employees have been grouped into the Administrative Support job category.

Administrative Support

There were 318 MARTA employees (including the 4 included from the Paraprofessionals job category) classified in the Administrative Support job category, with annual salaries ranging from approximately \$15,999 to \$70,000 plus. Of these 318 employees, 88 (28%) were male, while 230 (72%) were female; 304 (96%) were minorities, and 14 (4%) were Caucasian.

Three protected class groups were underutilized in the Administrative Support job category. These include Hispanic/Latino males and females, Asian Males and Females and Caucasian females.

Demographic	Underutilization
Hispanic/Latino Males	1.3%
Hispanic/Latino Females	2.3%
Asian Males	1.7%
Asian Females	1.6%
Caucasian Females	28%

Skilled Craft

The Skilled Craft workers job category included 705 MARTA employees, with annual salaries ranging from approximately \$33,000 to \$70,000. Of these 705 employees, 682 (97%) were male, while 23 (3%) were female; 622 were minorities (88%) and 83 (12%) were Caucasian.

Three protected class groups were underutilized in the Skilled Craft job category. Hispanic/Latino males and females, Asian females, and Caucasian females.

Demographic	Underutilization
Hispanic/Latino Males	18%
Hispanic /Latino Females	2%
Asian Females	0.7%
Caucasian Females	2.6%

Service-Maintenance

There were 1862 MARTA employees counted in the Service-Maintenance job category, with annual salaries ranging from approximately \$20,000 to \$54,999. Of these 1862 employees, 947 (51%) were male, while 915 (49%) were female. 1846 (99%) were minorities and 16 (1%) were Caucasian.

Three protected class groups were underutilized in the Service-Maintenance category. These include Hispanic/Latino males and females, Asian Males and Females, and Caucasian Females.

Demographic	Underutilization
Hispanic Males	9%
Hispanic Females	5.5%

Asian Males	2.1%
Asian Females	2,5%
Caucasian Females	14.6%

Refer to **Exhibit 14** for MARTA’s Utilization Analysis by job category.

GOALS AND TIMETABLES

MARTA’S EEO efforts are directed toward achieving gender and minority representation in all job groups that is equivalent to availability. Goals and timetables are excellent management tools that assist in the optimum utilization of human capital. Specific and detailed percentages and numerical goals with timetables must be set to correct any underutilization of specific affected classes of persons identified in the utilization analysis.

In establishing placement goals, MARTA applied the following principles:

1. When the percentage of minorities or women employed in a job group was less than would reasonably be expected given their availability percentage in that job group, MARTA established a percentage placement goal using statistically significant methods (the whole person rule). These goals consider the availability of qualified persons in the local labor market and the anticipated employment opportunities with MARTA.
2. Placement goals are not quotas that must be met, nor are they to be considered as either a ceiling or a floor for the employment of particular groups. The placement goals are guideposts that may be used as a measure of MARTA’s progress in remedying areas of underutilization in our workforce.
3. In all employment decisions, MARTA makes selections in a nondiscriminatory manner. Placement goals do not provide a justification to extend a preference to any individual, select an individual, or adversely affect an individual’s employment status, based on that individual’s race, color, religion, sex, age, disability, veteran status, or national origin.
4. Placement goals do not create set asides for specific groups, nor are they intended to achieve proportional representation or equal results.
5. Placement goals are not used to supersede merit selection principles, nor do these placement goals require the Company to hire a person who lacks qualifications to perform the job successfully or hire a less qualified person in preference to a more qualified one. MARTA believes that by making a good faith effort to making all aspects of our EEO Plan work, we will achieve our placement goals. MARTA’s placement goals are attainable with continued outreach and recruitment efforts targeted towards increasing a diverse pool of qualified applicants and with the implementation of action-oriented programs.

2022 EEO Plan Progress Against Goals

There was a slight change in the gender breakdown of the MARTA workforce between 2017 and 2021.

MARTA Workforce Overview			
Year	Total Workforce	Males	Females
2017	4492	64%	36%
2021	4193	61%	39%

Between 2017 and 2021 MARTA saw a slight change in race within its workforce. The percentage of both Hispanics/Latinos and Asians rose slightly. The largest increase in representation occurred in the "African American" category.

MARTA Workforce by Race and Ethnicity		
	2017	2021
African American	83.7%	86.1%
Caucasian	9.1%	7.4%
Hispanic/Latino	3.0%	3.3%
Asian	2.4%	2.7%
Native American	0.4%	0.45%

2018 Established Goals

The 2018 EEO Program Report set goals for twenty-four demographic groups across seven job categories. The Authority made some progress in twelve of the twenty-four categories and experienced a slight decline in utilization across eleven. A summary of progress against goals established in the 2018 report is captured in Figure 4.

2018 EEO Plan Goals endeavored to address and close the entire variance in some underrepresented categories and partially close the variance in others, with a well-intended objective of reaching full parity between MARTA's workforce and the labor market within a four-year period for several categories and partial parity in others. Full parity is the long-range objective. Although full parity was reached in areas shown in green in Figure 4, neither full parity nor the set goal was reached in many categories. However, MARTA did make positive strides in several categories. In eleven areas (marked in red), MARTA lost ground. This can largely be explained through the staffing shortage that MARTA faced during the pandemic and still currently. A large percent of the shortage is in the Service/Maintenance section which accounts for half of MARTA's personnel. MARTA is making every effort to fill these positions by conducting job fairs, giving hiring bonuses and recommendation bonuses.

Figure 4

Progress Against Goals 2017 – 2021 By Job Category			
	2017 Actual	Goal Set for 2021	2021 Actual Goal
Officials & Administrators			
▪ Asian	3.33%	2.5%	1.69%
▪ Hispanic/Latino	1.67%	2.83%	5.0%
▪ Caucasian Female	10%	30.2%	15.3%
Professionals			

▪ Female	33.54%	56%	37%
▪ Asian	5.35%	3.8%	4.9%
▪ Hispanic/Latino	3.09%	2.74%	3.14%
▪ Caucasian Female	2.8%	12.9%	2.6%
Technicians			
▪ Female	28.0%	54.1%	32%
▪ Asian	3.0%	4.7%	3.53%
▪ Hispanic/Latino		2.7%	5.9%
Protective Service			
▪ Caucasian Female	2.1%	6.1%	0.8%
Administrative Support			
▪ Asian	2.21%	2.4%	1.57%
▪ Hispanic/Latino	4.67%	3.3%	3.45%
▪ Caucasian Female	3.4%	10.8%	2.5%
Skilled Craft Workers			
▪ Female	3.68%	7.0%	3.26%
▪ Hispanic	4.60%	5.2%	5.53%
▪ Caucasian Female	0%	2.6%	0%
▪ Hispanic Male	4.6%	5.3%	5.5%
Service/ Maintenance			
▪ Female	41.01%	43.5%	49.2%
▪ Asian	0.43%	3.3%	0.27%
▪ Hispanic	1.83%	4.86%	1.45%
▪ Caucasian Female	0.4%	6.3%	0.3%
▪ Hispanic Male	1.2%	5%	0.8%
▪ Hispanic Female	0.7%	4.3%	0.6%

Utilization Goals 2022-2025

MARTA believes that by making a good faith effort to making all aspects of our EEO plan work, we will achieve our placement goals. MARTA's placement goals are attainable with continued execution of workforce strategies that include outreach and recruitment efforts targeted towards increasing a diverse pool of qualified applicants and with the implementation of action-oriented programs.

Long Term Placement Goals

MARTA's Long Term Placement Goals are established to correct areas of underutilization in our EEO categories. According to currently underutilized areas, specific goals have been established for Caucasian Females, Hispanic/Latino Males, and Hispanic/Latino Females which are short of full parity with the Atlanta MSA. However, these long-term goals are established for achievement in a four-year period:

- **Caucasian Female Professionals.** Increase by 72)
- **Caucasian Female Administrative Support.** Increase by 27.
- **Caucasian Female Officials and Administrators.** Increase by 5.
- **Caucasian Female Service Maintenance.** Increase by 75.
- **Caucasian Female Protective Service.** Increase by 8.

- **Caucasian Female Technician.** Increase by 7
- **Caucasian Female Skilled Craft.** Increase by 10.
- **Hispanic/Latino Male Skilled Craft.** Increase by 32.
- **Hispanic/Latino Male Officials and Administrators.** Increase by 2.
- **Hispanic/Latino Male Technicians.** Increase by 2
- **Hispanic/Latino Male Administrative Support.** Increase by 5
- **Hispanic/Latino Male Service Maintenance.** Increase by 70.
- **Hispanic/Latino Female Service Maintenance.** Increase by 50.

The underutilization of Asian males and females in most job categories was around 2%. Asian Males represent 2.3 of MARTA's workforce and Asian Females represent 0.4%. MARTA's Asian female and male workforce has increase by .3% since 2017.

Caucasian Females

Caucasian females are the most underutilized demographic group within MARTA's workforce. On June 30, 2021, there were only 50 Caucasian females employed at MARTA, representing 1.19% of the workforce, whereas in the Atlanta MSA, Caucasian females made up 25.4% of the workforce. MARTA has set job category specific goals to increase the percentage of Caucasian females within its workforce over the next four years as follows:

Professionals

Caucasian females were underutilized by 23% in 2021 in comparison to 31% in 2017 in the Professionals Category. MARTA has decreased its underutilization in Caucasian females by 8% since 2017. However, an addition of 266 Caucasian females would be needed to reach full parity with the supply in the Atlanta MSA. As this is not attainable MARTA sets the utilization goal at 10.4% which will require an increase of 72 Caucasian females in this category over the next 4 years (18 per year). To reach full parity with the available supply in the region over four years would be unrealistic, due to the large total numbers of Caucasian females that would have to be added to the Authority's workforce. MARTA has deemed that reaching a utilization rate of 10.4% to be attainable given hiring and turnover rates, and the availability of Caucasian females with professional skills in the Atlanta MSA.

Technicians

Caucasian females were underutilized by 16.5% in 2021 in the Technician Category. An addition of 14 Caucasian females would be needed to reach parity with the supply in the Atlanta MSA. As this is believed to be unattainable and unrealistic for this category, MARTA sets the utilization goal at 10.6% which will require an increase of 7 Caucasian females in this category over the next 4 years (2 per year for the first two years and 3 for the second two years).

Administrative Support

Caucasian females were underutilized by 28% in 2021 in comparison to 31% in 2017 in the Administrative Support Category. MARTA has decreased its underutilization in Caucasian females by 3% since 2017. However, an addition of 90 Caucasian females would be needed to reach full parity with the supply in Atlanta MSA. As this is not attainable MARTA sets the utilization goal at 11% which will require an increase of approximately 28 Caucasian females in this category over the next 4 years (7 per year). To reach full parity with the available supply in the region over four years would be unrealistic, due to the large total numbers

of Caucasian females that would have to be added to the Authority's workforce. MARTA has deemed that reaching a utilization rate of 11% to be attainable given hiring and turnover rates, and the availability of Caucasian females with administrative support skills in the Atlanta MSA.

Officials and Administrators

Caucasian females were underutilized by 9.05% in 2021 in comparison to 20% in 2017 in the Officials and Administrators category. MARTA has decreased its underutilization of Caucasian females by 11% since 2017. However, an addition of 9 Caucasian females would be needed to reach parity with national levels. As it is believed that this is not attainable in 4 years, MARTA set the utilization goal at 23.7% which will require an increase of 5 Caucasian females in this category over the next 4 years (1 per year for the first two years, and 3 for the following two years).

Service-Maintenance

Caucasian females were underutilized by 15% in 2021 in comparison with 17% in 2017 in the Service-Maintenance category. MARTA has decreased its underutilization rate by 2%. However, an addition of 275 Caucasian females would be needed to reach parity with the supply in the Atlanta MSA. As this is not attainable MARTA has set the utilization goal at 4.3% which will require an increase of 75 Caucasian females in this category over the next 4 years. To reach full parity with the available supply in the region over four years would be unrealistic, due to the large total numbers of Caucasian females that would have to be added to the Authority's workforce. MARTA has deemed 75 (18 per year for the first two years, and 39 for the remaining two years) additional Caucasian females in this category a reasonable effort given the positions that fall within this category and the availability of Caucasian females with service-maintenance skills in the Atlanta MSA.

Protective Service

Caucasian females were underutilized by 6% in 2021 in comparison with 7% in 2017 in the Protective Service category. MARTA has decreased its rate of underutilization by 1%. However, an addition of 19 Caucasian females would be needed to reach parity with the supply in the state of Georgia. As this is not believed to be attainable given the difficulty of currently hiring any employees in the Protective Service field MARTA has set the utilization goal at 4.1% which will require an increase of 8 Caucasian females in this category over the next 4 years (2 per year).

Skilled Craft

Caucasian females were underutilized by 2% in 2021 in comparison with 3% in 2017 in the Skilled Craft category. MARTA has decreased its underutilization by 1% based on a decrease in the Atlanta MSA. An addition of 18 Caucasian females would be needed to reach parity with the supply in the Atlanta MSA. Currently, MARTA has no Caucasian females in this category, and it is not believed that hiring 18 Caucasian females is attainable. MARTA has set the utilization goal at 1.4 (instead of full parity of 2.6%). This will require an increase of 10 Caucasian females in this category over the next 4 years (2 per year for the first two years, and 3 per year for the second two years).

Hispanic/Latino Males

The second most underutilized demographic group within MARTA's workforce were Hispanic/Latino males. On June 30, 2021 there were 101 Hispanic/Latino males employed at MARTA, representing 2.4% of the

workforce, whereas in the Atlanta MSA, Hispanic/Latino males made up 6.2% of the workforce. MARTA has set the following goals to increase the percentage of Hispanic males within its workforce over the next four years.

Skilled Craft

Hispanic/Latino males were underutilized by 17.9 % in the Skilled Craft category in 2021 and in 2017. An addition of 123 Hispanic/Latino males would be needed to reach parity with the supply in the Atlanta MSA. As this is not attainable MARTA has set the utilization goal at 10% which will require an increase of 32 Hispanic/Latino males in this category over the next 4 years (8 per year). This 10% utilization goal is less than the 23.5% goal needed to reach full parity.

Technicians

Hispanic/Latino males were underutilized by 2.4% in the Skilled Craft category in 2021. An addition of 2 Hispanic/Latino males would be needed to reach parity with the supply in the Atlanta MSA. MARTA has set a goal to close the gap in the utilization rate, and to hire 2 male Hispanic/Latino Technicians over the next two years (1 per year).

Administrative Support

Hispanic/Latino males were underutilized by 1.3% in the Administrative Support category in 2021. An addition of 5 Hispanic/Latino males would be needed to reach parity with the supply in the Atlanta MSA. MARTA has set a goal to close the gap in the utilization rate, and to hire 5 male Hispanic/Latino Administrative Support over the next four years (1 per year for the first two years, and 3 for the following two years).

Service-Maintenance

Hispanic/Latino males were underutilized by 9% in 2021 in comparison with 12% in 2017 the Service-Maintenance category. MARTA decreased its underutilization in the category by 3%. However, an addition of 168 Hispanic/Latino males would be needed to reach parity with the supply in the Atlanta MSA. As this is not attainable MARTA has set the utilization goal at 4.6% which will require an increase of 70 Hispanic/Latino males in this category over the next 4 years. This 4.6% goal is less than the 9.8% goal needed to reach full parity 17 per year for the first two years, and 36 for the following two years.

Officials and Administrators

Hispanic/Latino males were underutilized by 3.30% in 2021 in comparison with 4% in 2017 the Officials and Administrators category. There are no male Hispanic/Latino Officials and Administrators at MARTA, and an addition of 3 Hispanic/Latino males would be needed to reach parity with the national average. MARTA has set a goal to close the gap in the utilization rate, and to hire 2 male Hispanic/Latino Officials and Administrators over the next two years (1 per year).

Hispanic/Latino Females

The third most underutilized demographic group within MARTA's workforce were Hispanic/Latino females. On June 30, 2021 there were 38 Hispanic/Latino females employed at MARTA, representing 0.90% of the workforce, whereas in the Atlanta MSA Hispanic/Latino females made up 3.0% of the workforce.

Service-Maintenance

Hispanic/Latino females were underutilized by 6.2% in the Service-Maintenance category. An addition of 103 Hispanic/Latino females would be needed to reach parity with the supply in the Atlanta MSA. As this is not attainable MARTA has set the utilization goal at 3.3% which will require an increase of 50 Hispanic/Latino females in this category over the next 4 years (12 per year for the first two years, and 26 for the following two years). This is less than the 6.1% goal needed to reach full parity.

Short Term Placement Goals

MARTA's Short Term Placement Goals are established to address the immediate actions required to help achieve our Long-Term Placement Goals. The Short-Term Goals are set in increments of one (1) year and aligned with MARTA's fiscal year objective setting process. These objectives include but are not limited to the following:

- Internal in-depth organizational review and assessment of all company policies, programs, practices, processes and systems to identify potential impediments to a highly effective EEO Program and identification of root cause issues and solutions.
- Building a Culture Transformation Initiative that assists the organization in optimally shifting the diversity representation in the present workforce.
- Identifying and implementing systems and processes that support sustainable plans and change.

MARTA has established short term and long-term efforts to correct the areas of individual gender, racial and ethnic underutilization in our EEO categories and additionally increase diversity in our applicant pool. Our commitment to EEO efforts is continuous.

Employment Practices – Statistical Summary

Data Sources and Methodology

All tables used for the Employment Practices analyses are based on the sample charts provided by the FTA. While some minor changes have been made to the labeling and formatting of the sample charts, all formulas and calculations provided in the sample charts have been left intact. These completed charts can be found in **Exhibits 14 & 15**.

The Promotions, Training, Terminations, and Discipline (Demotions) tables use Total Workforce figures as a baseline for this analysis. The data in the Total Workforce row captures a snapshot of the MARTA workforce on 7/1/2021 plus all hires between 7/1/2017 and 6/30/2021. In other words, the Total Workforce figures account for all employees who worked at MARTA at any time during the reporting period, from 7/1/2017 and 6/30/2021.

For all tables, a selection rate for each demographic group is determined by dividing the number of people selected (promoted, trained, etc.) by a total pool of applicants or employees. For all tables, an impact ratio is determined by comparing the selection rate for each group with that of the highest group (by dividing the selection rate for a group by the selection rate for the highest group). Potential adverse impact is flagged for any group that has a selection rate that is less than 80% of the selection rate for the highest group.

As there were only four employees that MARTA categorized as paraprofessionals on 6/30/2021, data on paraprofessionals are reflected in the Administrative Support category for this analysis.

In accordance with FTA regulations, which state that analysis for any demographic groups constituting less than two percent of the applicable workforce is not required, selection rates, ratios to highest rate, and potential adverse impacts are not calculated in the tables for groups that constitute less than two percent of the applicable job category. In all tables, calculated fields for these small groups are indicated as N/A.

For Hires and Promotions, the total number of applicants and selected employees who self-identified as veterans are included in the calculations. The hire and promotion rates for self-identified veterans are summarized by gender and ethnicity, but not broken down by individual employment categories.

Statistical data on employees and applicants who self-identified as having a disability are unavailable. This analysis excludes all data on persons with disabilities.

Hires

The hires table accounts for all applicants for all positions (full time, part time, permanent, and temporary) at MARTA and all new hires for these positions during the reporting period of 7/1/2017 to 6/30/2021. The Number Applied row captures all individual applicants for positions at MARTA during the reporting period, and the Total Hires row captures all individual new hires at MARTA during the reporting period.

Refer to Figures 5 - 7 for the Hiring rates for all job categories by demographic group

Training

Statistical data on employee trainings are reliably and consistently tracked at MARTA. Data in the Total Trained Row captures the total number of MARTA employees who received training that fosters promotion at any time during the reporting period. Two hundred and Fourteen (214) MARTA training courses are deemed as having the potential to foster promotion. The training rate is derived by dividing the Total Trained row by the Total Workforce row.

Refer to Figure 8 for the Training rates for all job categories by demographic group.

Promotions

Statistical data on the number of applicants for promotion among existing employees at MARTA is unavailable. Instead, Total Workforce data is used as the baseline figure in the Promotions table. Data in

the Total Promotions row captures all job actions that MARTA deemed as promotions during the reporting period. These job actions include promotions, progressions, and temporary to full-time status changes.

Transfers

Statistical data on the number of applicants for transfers among existing employees at MARTA is unavailable. MARTA deems a wide variety of job actions as transfers, including position changes, bump and rolls, shop postings, part-time to full-time transfers, and full-time to part-time transfers. A statistical table on transfers is not included in this analysis, as data is not available on which transfer-related job actions were voluntary and/or desired by the employee.

Discipline (Demotions)

MARTA currently only consistently and reliably tracks data on demotions. Data on other disciplinary actions is unavailable. The Demotions row captures all employees demoted during the reporting period. The Discipline rate is derived by dividing the Demotions row by the Total Workforce row. As per the FTA sample tables, Potential Adverse Impact is flagged only if substantial disparities are shown in both the Discipline rate and the Not Disciplined Rate.

Terminations

The total number of employees terminated during the reporting period are captured in the Total Involuntary Terminations row of Exhibit 15, however the data is actually both voluntary and involuntary terminations. The Termination rate is derived by dividing the Total Terminations row by the Total Workforce row. As per the FTA sample tables, Potential Adverse Impact is flagged only if substantial disparities are shown in both the Retention Rate and Termination Rate.

Refer to Figures 9 and 10 for the Termination Rates for all job categories by demographic group.

Findings

Hires

A total of 18,104 males, 19,744 females and 1470 unknown persons applied for positions at MARTA during the reporting period of FY 7/1/2017 through 6/30/2021. 1,295 males and 1,143 females were hired at MARTA during this period, representing a (7%) hiring rate for males and a (6%) hiring rate for females.

For the reporting period MARTA hired 105 (8.2%) out of 1267 Caucasian male applicants, and 30 (6.1%) out of 488 Caucasian female applicants. The Authority hired 1190 (7%) out of 16,837 minority male applicants, and 1,113 (6%) out of 19,256 minority female applicants.

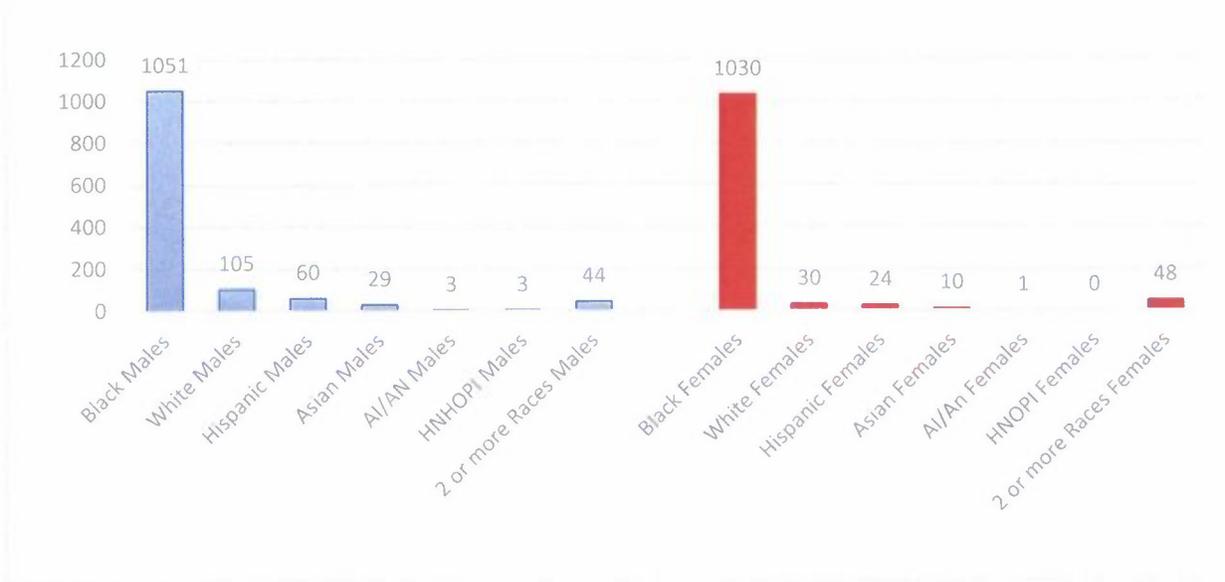


Fig. 5 – MARTA Hires, 7/1/2017 - 6/30/2021. Totals by Demographic Group

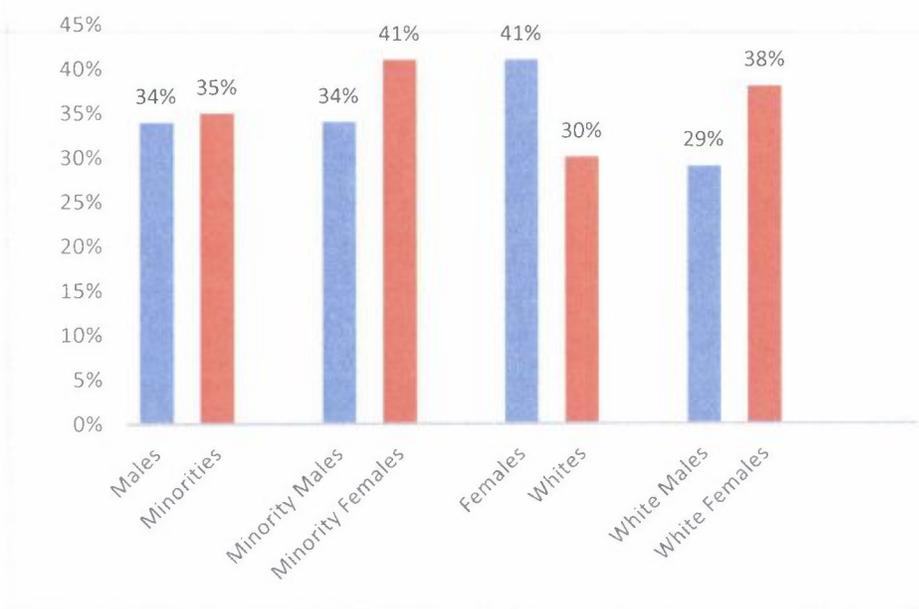


Fig.6 – MARTA Hiring Rates: All Job Categories, 7/1/2017 - 6/30/2021
Applicant to Hire Ratio by Gender and Minority Status

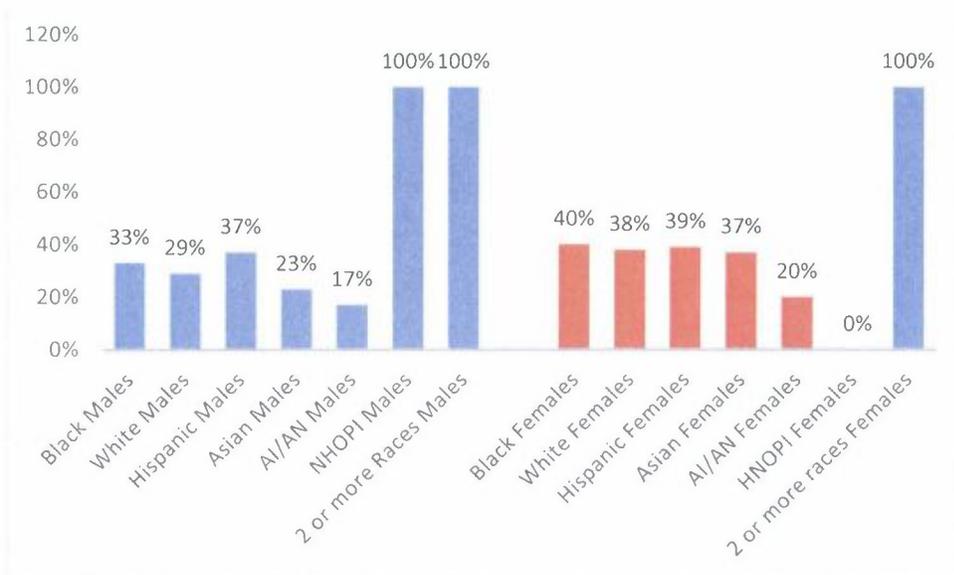


Fig. 7– MARTA Hiring Rates: All Job Categories, 7/1/2017 – 6/30/2021

Officials and Administrators

For the Officials and Administrators job category, MARTA hired 29 (3%) out of 872 male applicants, and 11 (2.2%) out of 494 female applicants. There is potential adverse impact for females in this category as the hiring rate of females was only 73% of the hiring rate of males.

In the Officials and Administrators job category, the demographic group that was hired at the highest rate was Caucasian females (19%). Considering this figure, calculations show potential adverse impact for six demographic groups. These include Caucasian males (9%), Hispanic males (3%) and females (7%), Black females (0.96%), Black males (1.6%), Asian males (4%) Asian females (0%), American Indian males and females (0%) and Native Hawaiian males and females at (0%), all of which were hired at a rate below 80% of Caucasian females in this category.

Professionals

For the Professionals job category, MARTA hired 199 (2.8%) out of 6420 male applicants, and 161 (3%) out of 5380 female applicants. No potential adverse impact against were flagged for males or females for this job category.

In the Professionals job category, the demographic group that was hired at the highest rate was American Indian males (15%). Considering this figure, calculations show potential adverse impact for six demographic groups. These include Caucasian males (7%), Caucasian females (7%), Hispanic males (3%), Hispanic females (5%), Black males (3%), Black females (3%), Asian females (6%), Asian Males (2%), 2 or more races males (3%) and females (2%), and Native Hawaiian males (11%) and females (0%), all of which were hired at a rate below 80% of American Indian males in this category.

Technicians

For the Technicians job category, MARTA hired 9 (6%) out of 121 male applicants, and 2 (2%) out of 137 female applicants. There may be a potential adverse impact against females in this job category, as the hiring rate of females was only 33% of the hiring rate of males.

In the Technicians job category, the demographic group that was hired at the highest rate was Hispanic males and females at (33%). Considering this statistic, calculations show potential adverse impact for five demographic groups. Black males (6%), Black females (.96%), Caucasian males (19%), Caucasian females (0%), Asian males and females (0%) and Indian males and females (0%), all of which were hired at a rate below 80% of Hispanic males and females.

Protective Services

For the Protective Service job category, MARTA hired 126 (25%) out of 453 male applicants, and 57 (4%) out of 1473 female applicants. There may be a potential adverse impact against females in this job category, as the hiring rate of females was only 16% of the hiring rate of males.

In the Protective Service job category, the demographic group that was hired at the highest rate was Hispanic males (100%). Considering this statistic, calculations show potential adverse impact for five demographic groups. Black males (23%), Black females (4%), Caucasian males (69%) and females (0%), Hispanic females (10%), Asian females (0%), and American Indian males (0%), all of which were hired at a rate below 80% of Hispanic males.

Administrative Support

For the Administrative Support job category, MARTA hired 68 (2%) out of 3263 male applicants, and 182 (2%) out of 8086 female applicants. There was no adverse impact against females or males in this job category.

In the Administrative Support job category, the demographic group that was hired at the highest rate was Hispanic males (9%). Considering this figure, calculations show potential adverse impact for six demographic groups. These groups were Caucasian females (3%), Caucasian males (6%) Hispanic females (6%), Black females (2%), Black males (2%), Asian males (1%), Asian females (4.2%), American Indian males and females (0%), Native Hawaiian males and females (0%) and 2 or more races males (0%) and 2 or more races females (3%), all of which were hired at a rate below 80% of Hispanic males.

Skilled Crafts

For the Skilled Craft job category, MARTA hired 194 (6%) out of 3163 male applicants, and 6 (1.1%) out of 534 female applicants. There may be a potential adverse impact against females in this job category, as the hiring rate for females was only 18% of the hiring rate of males.

In the Skilled Craft job category, the demographic group that was hired at the highest rate was Hispanic males and Asian males (13%). Considering this figure, calculations show potential adverse impact for six demographic groups. These groups are Caucasian males (7%), Caucasian females (0%), Hispanic females (0%), Black females (0.8%), Black males (5%) and Asian females (0%), all of which were hired at a rate below 80% of Hispanic and Asian males.

Service-Maintenance

For the Service-Maintenance job category, MARTA hired 674 (17%) out of 3978 male applicants, and 725 (20%) out of 3550 female applicants. No potential adverse impacts were flagged for males or females for this job category.

In the Service-Maintenance job category, the demographic group that was hired at the highest rate was Hispanic males (27%). Considering this figure, calculations show potential adverse impact for six demographic groups. These groups are Caucasian males and females (11%), Hispanic females (13%), Black females (20%), Black males (18%), Asian males (13%), Asian females (0%), American Indian males (3.4%) and females (10%), Native Hawaiian males and females (0%), 2 or more races males (19%), and 2 or more races females (18%), all of which were hired at a rate below 80% of Hispanic males.

Veterans

A total of 178 males and 39 female veterans were hired at MARTA during the reporting period of 7/1/2017 through 6/30/2021. Five (5) Hispanic males and two (2) Hispanic female veterans were hired. One hundred and sixty-two (162) Black males and twenty-four (24) Black female veterans were hired. One (1) Native Hawaiian and nine (9) 2 or more races veterans were hired. Only ten (10) white male veterans were hired, and no white female veterans were reported as hired.

Training

A total of 3859 males and 2772 females were employed at MARTA during the reporting period of 7/1/2017 through 6/30/2021. 997 males and 1,357 females received training that fosters promotion at MARTA during this period, representing a (26%) training rate for males and a (49%) training rate for females.

MARTA trained 163 (45%) out of 366 Caucasian male employees, and 61 (76%) out of 80 Caucasian female employees. The Authority trained 834 (24%) out of 3493 minority male employees, and 1296 (48%) out of 2692 minority female employees.

**(a total of 78 individuals were listed as Not Reporting)*

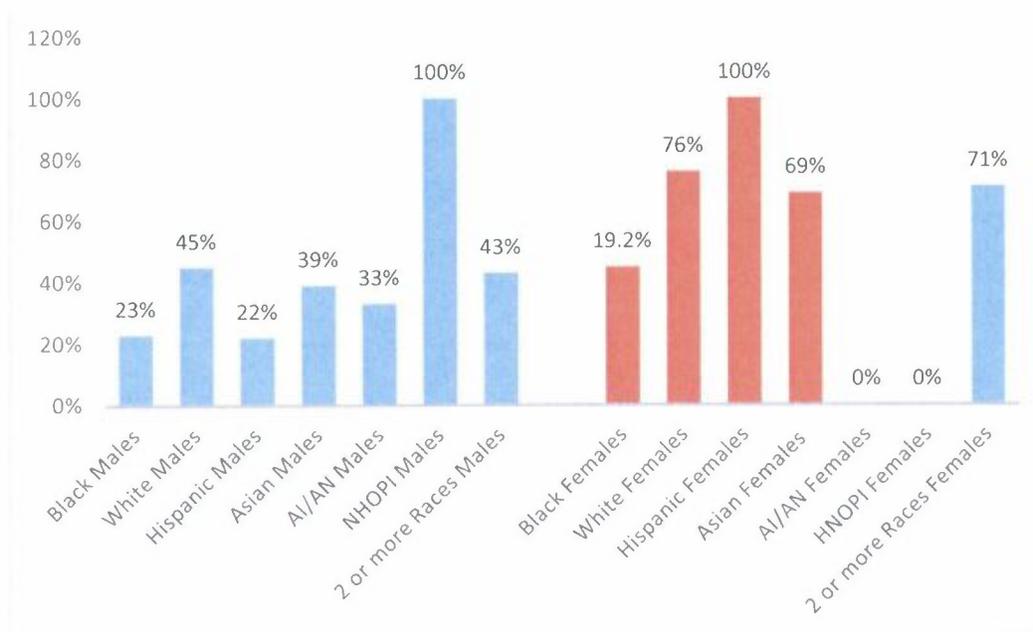


Fig. 8– MARTA Training Rates – All Job Categories, 7/1/2017 – 6/30/2021
Totals by Demographic Group

Promotions

A total of 3859 males and 2772 females were employed at MARTA during the reporting period of 7/1/2017 through 6/30/2021. 576 males and 238 females were promoted at MARTA during this period, representing a (15%) promotion rate for males and a (9%) promotion rate for females. There may be potential adverse impact against females in this job category, as the promotion rate of females was only 60% of the promotion rate of males.

MARTA promoted 62 (17%) out of 366 Caucasian male employees, and 5 (6.2%) out of 80 Caucasian female employees. The Authority promoted 515 (15%) out of 3493 minority male employees, and 233 (7%) out of 2692 minority female employees, showing a potential adverse impact for both Caucasian and minority females.

Officials and Administrators

For the Officials and Administrators job category, MARTA promoted 14 (23%) out of 62 male employees, and 13 (37%) out of 35 female employees. There was not any potential adverse impact against females in this job category.

In the Officials and Administrators job category, the demographic group that was promoted at the highest rate was Hispanic males (100%). Considering this figure, calculations show potential adverse impact for three demographic groups. Black females (59%), Black males (31%), Caucasian females (7%), Caucasian males (12%), Hispanic females (50%), and Asian males and females (0%), all of which were promoted at a rate below 80% of Hispanic males.

Professionals

For the Professionals job category, MARTA promoted 237 (31%) out of 768 male employees, and 125 (25%) out of 495 female employees. No potential adverse impacts were flagged for females for this job category.

In the Professionals job category, the demographic group that was promoted at the highest rate was American Indian males (75%). Considering this figure, calculations show potential adverse impact for three demographic groups: Black males (33%) and females (27%), Caucasian females (8%), Caucasian males (22%), Asian females (5%), Asian males (9%), and Hispanic males (42%), all of which were promoted at a rate below 80% of American Indian males.

Technicians

For the Technicians job category, MARTA promoted 21 (32%) out of 65 male employees, and 15 (52%) out of 29 female employees. No potential adverse impacts were flagged for females for this job category.

In the Technicians job category, the demographic group that was promoted at the highest rate was Black females (54%). Considering this figure, calculations show potential adverse impact for three demographic groups. These include Black males (31%), Asian males and Hispanic females both at (33%), and Caucasian males (31%), all of which were promoted at a rate below 80% of Black females. There was not enough Asian or American Indian representation in the category to conduct an analysis.

Protective Service

For the Protective Service job category, MARTA promoted 1 (0.33%) out of 295 male employees, and 8 (6.4%) out of 124 female employees. There was no adverse impact against females in this job category.

In the Protective Service job category, the demographic group that was promoted at the highest rate was Black females (0.86%). Considering this figure, calculations show potential adverse impact for Black males (0.44%), Hispanic/Latino males and females (0%), Asian males and females (0%), and Caucasian males and females (0%), all of which were promoted at a rate below 80% of Black females.

Administrative Support

For the Administrative Support job category, MARTA promoted 10 (6.7%) out of 150 male employees, and 41 (10%) out of 401 female employees. No potential adverse impacts were flagged for males or females in this job category.

In the Administrative Support job category, the demographic group that was promoted at the highest rate was Black females (11%). Considering this figure, calculations show potential adverse impact for three demographic groups. These include Black males (7%), Hispanic females (6.25%) and Caucasian males (6.25%). Caucasian females, Hispanic males, Asian males and Asian females were all at (0%). All of these groups were promoted at a rate below 80% of Black females.

Skilled Craft

For the Skilled Craft job category, MARTA promoted 260 (11%) out of 868 male employees, and 16 (20%) out of 27 female employees. There was no adverse impact against females in this job category.

In the Skilled Craft job category, the demographic group that was promoted at the highest rate was Black females (59%). Considering this figure, calculations show potential adverse impact for four demographic groups. These groups include Caucasian males (20%), Black males (32%), Asian males (19%), Hispanic males (40%), and Indian males (14%). Caucasian females, Hispanic females and Asian females are at 0%. All of these groups were promoted at a rate below 80% of Black females.

Service-Maintenance

For the Service-Maintenance job category, MARTA promoted 19 (1.1%) out of 1596 male employees, and 15 (0.93%) out of 1611 female employees. There does not appear to be a potential adverse impact against females in this job category.

In the Service-Maintenance job category, the demographic group that was promoted at the highest rate was Asian males (13%). Considering this figure, calculations show potential adverse impact for Black females (.94%) and Black males (1.1%), Caucasian males (4%) and Caucasian females (0%), American Indian males and females, Hispanic males and females and Asian females were promoted at a rate of (0%), all of which were promoted at a rate below 80% of Asian males.

Discipline (Demotions)

A total of 3859 males and 2772 females were employed at MARTA during the reporting period of 7/1/2017 through 6/30/2021. 15 males and 6 females were demoted at MARTA during this period, representing a demotion rate of (0.38%) for males and (0.21%) for females.

MARTA demoted 1 (0.27%) out of 366 Caucasian male employees, and 1 (1.25%) out of 80 Caucasian female employees. The Authority demoted 14 (0.40%) out of 3493 minority male employees, and 5 (0.18%) out of 2692 minority female employees.

A narrative breakdown of demotions by job category will not be presented here, due to the extremely small and negligible number of demotions at MARTA during the reporting period. The analysis showed no adverse impacts on any demographic groups across all job categories.

Terminations⁴

A total of 3859 males and 2772 females were employed at MARTA during the reporting period of 7/1/2017 through 6/30/2021. 1,550 males and 1103 females were terminated at MARTA during this period, representing a termination rate of (40%) for males and (38%) for females. There were no adverse impacts for males or females.

MARTA terminated 187 (51%) out of 366 Caucasian male employees, and 43 (54%) out of 80 Caucasian female employees. The Authority terminated 1363 (39%) out of 3493 minority male employees, and 1060 (39%) out of 2692 minority female employees.

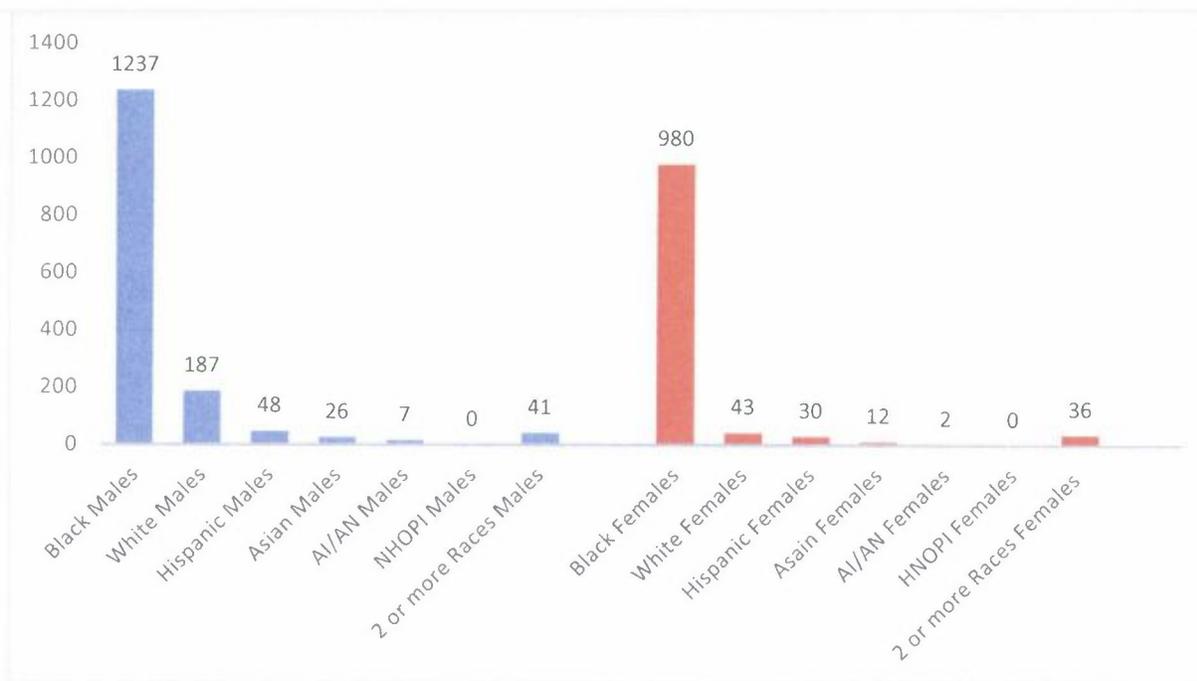


Fig. 9 – Terminations at MARTA – All Job Categories, 7/1/2017 – 6/30/2021
Totals by Demographic Group

⁴ Terminations represent both voluntary and involuntary terminations.

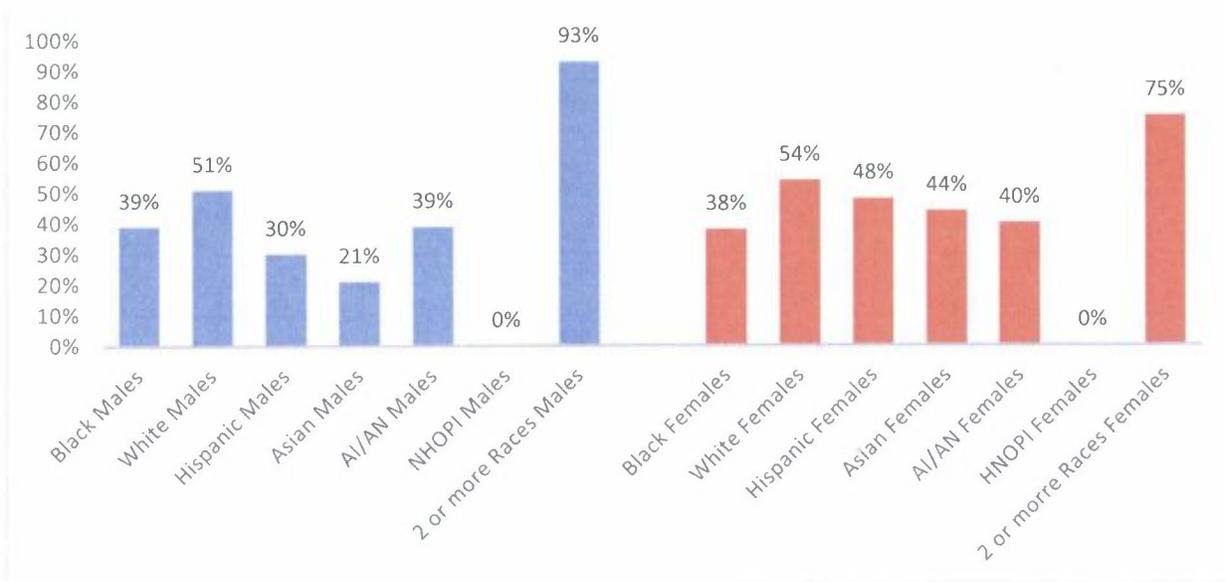


Fig. 10 – Termination Rates at MARTA – All Job Categories, 7/1/2017 – 6/30/2021
Percentages by Demographic Group

Officials and Administrators

In the Officials and Administrators job category, MARTA terminated 31 (50%) out of 62 male employees, and 18 (51%) out of 35 female employees. There were no adverse impacts flagged for females.

In the Officials and Administrators job category, the demographic groups that were retained at the highest rates were Hispanic females and Asian females (100%). Potential adverse impacts were shown for Caucasian males (55%) Caucasian females at (79%), Black males (46%), and Black females (18%) and Hispanic males (0%), all retained at a rate below 80% of Hispanic and Asian females.

Professionals

In the Professionals job category, MARTA terminated 335 (44%) out of 768 male employees, and 193 (39%) out of 495 female employees. No potential adverse impacts were flagged for males or females for this job category, as termination and retention rates were comparable between the genders.

In the Professionals job category, the demographic group that was terminated at the highest rate was Hispanic females at (73%). Caucasian males were terminated at (49%). Caucasian females were terminated at (42%), and Black males and females were terminated at (43%) and (38%) respectively. Hispanic males were terminated at (38%). Asian females and males were terminated at the rate of (30%) and (36%) respectively. American Indian female were terminated at a rate of (50%), while American Indian males were terminated at a rate of (33%).

Based on retention rates there is potential adverse impact for the Hispanic females, Caucasian males, and American Indian females.

Technicians

In the Technicians job category, MARTA terminated 26 (40%) out of 65 male employees, and 12 (41%) out of 29 female employees. No potential adverse impacts were flagged for females for this job category, as termination and retention rates were comparable between the genders.

In the Technicians job category, the demographic group that was terminated at the highest rate was Caucasian males (62%). Caucasian females were at (50%). Black females and males were terminated at (42%) and (40%) respectively. Hispanic females were terminated at (33%) and Hispanic males, and Asians and American Indians were at (0%). Based on retention rates, all groups have potential adverse impacts, except Hispanic males, Asians and American Indians.

Protective Service

In the Protective Service job category, MARTA terminated 156 (53%) out of 295 male employees, and 63 (50%) out of 124 female employees. No potential adverse impacts were flagged for males or females for this job category, as termination and retention rates were comparable between the genders.

In the Protective Service job category, the demographic group that was terminated at the highest rate was Caucasian females (100%). Caucasian males were terminated at the rate of (92%), Black males at (53%) and Black females at (47%). Hispanic males and females were terminated at (28%) and (43%) respectively. Asian males were terminated at (29%) and there were no terminations reported for Asian females.

Based on retention rates there is potential adverse impact for the following demographic groups: Caucasian males, Caucasian females, Black males at, Black females and Hispanic females.

Administrative Support

In the Administrative Support job category, MARTA terminated 103 (69%) out of 150 male employees, and 203 (51%) out of 401 female employees. There may be an adverse impact for males for this job category, as retention rates were at (63%) of females.

In the Administrative Support job category, the demographic group that was terminated at the highest rate was Caucasian males (94%). Hispanic/Latino males were terminated at a rate of (73%) and Hispanic females were at a rate of (56%). Black males and females were terminated at the rate of (63%) and (49%) respectively. Caucasian females were terminated at a rate of (85%), Asian males were at (67%) and Asian females were at (83%).

The highest retention rate was Black females at 51%, which means that all above demographic groups have potential adverse impacts except Hispanic females.

Skilled Craft

In the Skilled Craft job category, MARTA terminated 181 (21%) out of 868 male employees, and 6 (22%) out of 27 female employees. No potential adverse impacts were flagged for males or females for this job category, as termination and retention rates were comparable between the genders.

In the Skilled Craft job category, the demographic group that was terminated at the highest rate was Caucasian males (35%). Black males and Black females were at (20%) and (22%) respectively. Hispanic males were at (15%), and Hispanic females were at (0%). Asian males were at (9%) and Asian females were at (0%) and American Indian males were at (14%). There were no terminations reported for Caucasian females, Asian females and Hispanic females.

Based on retention rates, there is a potential adverse impact for Black females and Caucasian males.

Service-Maintenance

In the Service Maintenance job category, MARTA terminated 672 (42%) out of 1596 male employees, and 570 (35%) out of 1611 female employees. No potential adverse impacts were flagged for females for this job category.

In the Service-Maintenance job category, the demographic group that was terminated at the highest rate was Caucasian females (80%). Black males and females were terminated at a rate of (42%) and (35%) respectively. Hispanic males and females were at both terminated at a rate of (35%). Caucasian males were terminated at a rate of (60%), and Asian males at (25%), and no terminations were reported for Asian females.

Based on retention rates, there is a potential adverse impact for all above demographics groups except Asian females.

ASSESSMENT OF EMPLOYMENT PRACTICES

FTA guidelines mandate that recipients, sub-recipients and contractors must conduct a detailed assessment of present employment practices to identify those that operate as employment barriers and unjustifiably contribute to underutilization. As a direct recipient of FTA funding, MARTA complies with this directive. Additionally, MARTA has established and complies with internal Agency employment practice policies. MARTA's 2022 EEO Plan includes a summary of the following company employment practices: recruitment, application, selection and hiring, total rewards, promotions, training and terminations.

Recruitment Process

MARTA is committed to attracting, selecting and employing the most qualified candidates. Our Human Resource Department and Office of Diversity and Inclusion carry primary responsibility for ensuring the Authority executes programs and activities that support effective diversity recruitment. The Office of

Diversity and Inclusion also provides direction to the Human Resources Department on hiring targets for underrepresented groups. Recruiting activities support establishment of Qualified Candidate Pools (QCP) that include diverse demographic representation. MARTA's Office of Diversity and Inclusion guides and partners with the Department of Human Resources (HR) to engage diversity organizations, and sponsor and participate in diversity outreach initiatives to encourage and promote diverse internal candidate pools. HR Recruiters are responsible for developing and conducting objective recruitment processes in compliance with applicable employment laws, regulations and MARTA's HR Policies. HR Department representatives represent the hiring authority as subject matter experts in recruiting and selecting candidates to fill Authority wide vacancies. A list of MARTA's recruitment outreach lists is found in **Exhibit 9**.

Application Procedures

All candidates for MARTA employment must complete and submit an employment application online through MARTA's website during the established posting timeframe. Employment opportunities post for a specified number of no less than five days and all applicants that apply using the established online application process, are established as the candidate pool. Candidates may find step-by-step instructions on how to apply using MARTA's on-line application system, on MARTA's Career website: <https://www.itsmarta.com/how-to-apply.aspx>. Computers are available in MARTA's Office of Diversity and Inclusion for applicants needing access to a computer, or assistance with completing their application.

Position Profile Review

MARTA reviews position descriptions prior to posting a bulletin for recruitment purposes. The hiring department reviews the job specification to ensure it is accurate. If the hiring department determines that the job specification requires revision(s), the department will make necessary changes that are then reviewed by Human Resources Classification & Compensation staff. Once the hiring department and Human Resources concur with the changes, updates are made.

Selection Standards and Procedures

The HR Recruiting representatives consult with each hiring representative (who serve as technical subject matter experts) to determine selection process components. The recruiting representative ensures compliance with MARTA policy, federal and state equal employment opportunity and labor laws, and the federal guidelines on employee selection. Based on the recruiter and hiring representative consultation, the recruiter uses objective criteria to establish a qualified candidate pool. This pool is reviewed with the hiring representative and both parties then establish the candidate interview list

The total candidate evaluation process may consist of, but not be limited to, any combination of the following: standard and supplemental application information; written, multiple choice, essay, performance and/or physical agility tests, review of performance evaluation for internal candidates, and panel interviews. The selection process is competitive, objective, related to the job criteria and based on the knowledge, skills, and abilities required for the position.

Interview Procedures

MARTA employs a two-tier interview process for non-represented positions. The first tier involves a three to four-member evaluation panel that interviews selected QCP applicants using objective behavioral interview questions and a five-tier quantified rating system. The second tier is established as a final functional fit with two members of the hiring department: A representative of the hiring department at a

compensation grade one level higher than the position being interviewed and a representative from the hiring department at a compensation grade two levels higher than the position being interviewed. A Recruiting representative meets with interview panelists prior to the interview to explain all aspects of the interview process. Post interview, the recruiter conducts a debriefing with the interview panel to ensure that all candidates have been scored. Efforts are made in the selection of the interview panel to reflect diverse demographics. Office of Diversity staff is available to monitor the interview process. The Recruiting Representative ensures diversity representation of the employee selection interview panels and The Manager of Diversity and Inclusion holds discussions with Human Resources to address underutilization.

Compensation

Wages and salary structure for union personnel are outlined in union contracts. The salary structure is seniority based and the collective bargaining agreement outlines seniority practices. MARTA union personnel are represented by the Amalgamated Transit Union (ATU) collective bargaining unions

Wages for non-represented (nonunion) classifications are determined by evaluating the education, experience, and other qualifications of an individual and comparing those qualifications to the qualifications of other individuals in the same job classification. If the candidate is being hired into a single position classification, that candidate's qualifications are compared with the qualifications of others in similar positions, salary grades, and cost centers. Each salary grade has a minimum, mid-point, and maximum salary. Placement in the grade is determined by the qualifications of each candidate. HR Policies can be found in **Exhibit 7**.

Training

Employees may access the MARTA Intranet, Training & Development site, and select free classes that cover topics such as workplace safety, leadership development, public speaking, team building, customer protocols and business etiquette. MARTA also has tuition reimbursement for employees who wish to pursue higher education.

Additionally, MARTA offers the MAX Program (Multiple Agency Exchange). The Max Program is a partnership between MARTA, Denver Rapid Transit, Dallas Area Rapid Transit and Los Angeles County Metro Transit Authority (LCMTA). Each agency sends eight high potential management employees to participate in an exchange program with the other partner transit agencies. The goal of the Max Program is to prepare transit employees for promotion into leadership roles. Improving the Authority's internal pool of qualified diverse candidates is a significant factor in the selection of participants. Examples of MARTA's training and development opportunities are found in **Exhibit 8**.

Transfers

MARTA allows non-represented employees to transfer from one department or division to another non-represented position in accordance with HR procedures. Transfers for represented employees occurs according to the governing union contract established between the Amalgamated Transit Union (ATU) and MARTA.

There are three types of transfers:

Employee-Initiated Transfer: If an employee wishes to move to another department, the employee must submit a Transfer Request Form and current resume to the Human Resources Department. Employees are eligible to transfer to positions at or below their current salary grade, which are either the same classification as the employee's current position, or a comparable position which requires the same or similar knowledge, skills, and abilities, and for which the employee meets the minimum qualifications. An employee must have received "Meets Expectations" or better on his or her most recent individual performance evaluation to be eligible to request an Employee-Initiated Transfer to an equivalent salary-grade position. When a vacancy occurs, those candidates on the transfer list who most closely match the Ideal Candidate Profile for the vacancy being filled will be certified to the hiring authority for an interview.

Management-Initiated Transfer: Executive Officers or higher in the MARTA management hierarchy may initiate a transfer when necessitated by changes in workloads, reorganization, or any other business reason.

Disability Transfer: If an employee becomes permanently disabled and unable to perform the essential functions of his/her job, as part of a reasonable accommodations process, the employee may be transferred into a vacant position with essential duties the employee can perform.

Performance Management

Performance Assessments

MARTA purchased licensing to Halogen Performance for the execution of our performance appraisal process. Halogen provides us with cloud-based performance management software that aligns individual performance and goals to company strategy, connects development to performance, provides a structured evaluation tool, and promotes our feedback culture. It additionally provides us with a single repository and methodology for collecting appraisal-based employment data and compliance with regulatory record keeping requirements. The tool is utilized in the appraisal process for non-represented employees.

Discipline

MARTA provides a progressive disciplinary process to correct unacceptable employee performance and/or behavior. This provides employees the opportunity to address performance gaps and/or correct improper conduct or conduct that violates MARTA policy, before receiving more severe disciplinary action. Commission of the following offenses may result in the offending employee's suspension, demotion or discharge: acts that significantly and negatively impact MARTA's day-to-day operations; serious MARTA policy violations; violations of state or federal law, and other conduct adversely affecting the employee's work performance or environment. The collective bargaining agreement outlines disciplinary practices, for union represented employees.

Terminations

Generally, terminations may be either voluntary or involuntary and are as follows:

- **Voluntary Termination:** Resignation, retirement, job abandonment, and expiration of medical disability leave.
- **Involuntary Termination:** Discharge and reduction in force.

MONITORING AND REPORTING SYSTEMS

MARTA will develop and implement enhanced monitoring and reporting systems that ensure the effectiveness of our EEO Program through routine monitoring and measurement. While not all the EEO categories show that MARTA met all the labor market standards, The Metropolitan Atlanta Rapid Transit Authority is committed to making good faith efforts to achieve our goals. MARTA views the monitoring activities that are listed below as critical to the success of our EEO Program.

1. The Executive Director of Diversity and Inclusion provides EEO progress reports to MARTA's Chief Executive Officer/GM. The Executive Director reports on the effectiveness of the program and submits recommendations for improvement. Progress updates will be issued to the Board of Directors as well.
2. the Office of Diversity and Inclusion increased diversity representation in employee selection interview panels and discussions with Human Resources to correct underutilization.
3. The Office of Diversity and Inclusion will concur on MARTA's hires and promotions.
4. EEO staff monitors and conducts EEO Title VII and Title VI investigations for MARTA.
5. Top management is and will continue to be informed of any problems that arise in their respective areas so that immediate and appropriate steps can be taken to resolve any issues.
6. MARTA recognizes its responsibility to affirmative action and is committed to fulfilling this responsibility by complying with all government regulations and laws pertaining to equal employment opportunity. As part of this commitment, management will be kept abreast of developments in the affirmative action area. The primary vehicle for communication with management will be periodic affirmative action briefings.
7. The Office of Diversity and Inclusion will circulate internal reports on a regular basis to evaluate the degree to which equal employment opportunity and organizational objectives are being obtained.
8. MARTA will review report results with all levels of management as to the degree to which their affirmative action goals and compliance are being attained, and will design and implement corrective actions, including adjustments in programs, as needed.
9. Progress on MARTA's EEO Program will be discussed at leadership meetings, and relevant information will be communicated to employees during regular departmental meetings as appropriate.

Subrecipient and Contractor Monitoring

The Metropolitan Atlanta Rapid Transit Authority is committed to ensuring that our subrecipients and contractors carry out the EEO provisions outlined in FTA CFR 4704.1 regarding Equal Employment Opportunity Program Guidelines for Grant Recipients. MARTA's Office of Diversity and Inclusion currently oversees subrecipients and contractors' compliance and will ensure an enhanced EEO Plan monitoring program which includes the following:

1. A thorough review of the subrecipients and contractor's EEO/Affirmative Action Programs or Plans. If MARTA finds deficiencies in the subrecipient or contractor's EEO program, based on our interpretation of Circular 4704.1, MARTA will inform the subrecipient or contractor of the

deficiencies in writing and provides a time frame and a due date for the subcontractor to remedy the deficiency.

2. Site visit of the subrecipients or contractors' worksites to ensure compliance with EEO Statement of Policy and other antidiscrimination and anti-harassment policies, posting requirements.
3. Documentation of subrecipient or contractor's compliance with Circular 4704.1.

The Authority monitors subrecipients to ensure their compliance with the Authority's EEO Program. The Authority also monitors its contractors who are required to provide Affirmative Action Plans or EEO policies. Contractors are also required to provide EEO-1 data. A list of subrecipients and contractors is attached as **Exhibit 10**. As there are too many contractors to provide all subrecipient and contractor monitoring documents, a sample of monitoring documents are provided in **Exhibit 11**. The Authority has and will continue to provide subrecipients and contractors with technical assistance in the form of direct guidance in addition to supplemental resources, such as sample documents (copies of MARTA's EEO Statement of Policy and Sample EEO/Affirmative Action Plans).

EQUAL EMPLOYMENT OPPORTUNITY COMPLAINT PROCEDURES

A priority of MARTA's Office of Diversity and Inclusion is to conduct EEO investigations and make recommendations on corrective actions. MARTA is aware that discrimination or the perception of discrimination, can be detrimental to the work environment and therefore we strive to maintain a working environment that values diversity in which all its employees are free from discrimination and harassment. The Office of Diversity and Inclusion works closely with department and division managers, supervisors, and employees to resolve all EEO Title VII complaints. EEO staff thoroughly and promptly investigate the merit of each complaint in a confidential manner employing a process that is respectful to all parties involved. All employees are made aware of their EEO protections and rights at new employee orientations, sexual harassment prevention trainings, and through MARTA's EEO policies and EEO Policy Statement posted in multiple Authority sites. A copy of MARTA's EEO policies are included under **Exhibit 12**. A copy of MARTA's EEO Complaint Procedures and Complaint form is found in **Exhibit 13**.

EXHIBIT 1

MARTA's Equal Employment Opportunity Policy Statement

**NOTICE
EQUAL EMPLOYMENT OPPORTUNITY
POLICY STATEMENT**

To all MARTA Employees, Contractors, and Subcontractors:

MARTA will comply with all applicable federal and state statutes, executive orders, and regulations regarding equal employment opportunity. These laws prohibit discrimination, require selection of individuals for employment to be based on job related criteria, and require posting or notices of employee's rights.

MARTA is committed to ensuring equal employment opportunity in all personnel actions, including recruitment, selection, hiring, transfers, training, promotion, compensation, benefits, layoffs, demotions, terminations, and evaluation of all qualified persons, as provided for in applicable federal and state laws. MARTA is further committed to undertake a nondiscrimination program, including policies, procedures, practices, goals and timetables, in order to overcome the effects of past discrimination on minorities and women.

MARTA, sub-recipients, and contractors will select employees according to the requirements of the job and are committed to hiring, promoting, and retaining the best qualified persons for all positions regardless race, color, religion, national origin, sex, age, disability, genetic information, pregnancy, sexual orientation, gender identity, veteran status, military service and/or marital status. MARTA will not discriminate based on any of these characteristics. This applies to every personnel action including, but not limited to: promotion, transfer, demotion, disciplinary action, recruitment, reduction in force/recall, compensation, benefits, selection for training, and testing.

The MARTA policy on equal employment opportunity (EEO) is disseminated to all new hires and posted at prominent locations throughout its facilities and on its intranet and website. Management is responsible for ensuring that policy statements remain prominently displayed on all official facility bulletin boards. Management and supervisors share in EEO compliance responsibility and their performance will be evaluated on the success of the equal employment opportunity program the same way as their performance on other Authority goals and objectives.

I, as the General Manager/CEO have the ultimate responsibility for implementing and ensuring that equal employment opportunity and affirmative action receive the highest level of priority. Paula Nash has been appointed the Executive Director of the Office of Diversity and Inclusion (ODI) as the Authority's Chief Compliance Officer.

The Office of Diversity and Inclusion (ODI) strives to affect cultural and organizational changes to achieve a workplace that embraces diversity, professional and personal integrity, and is conducive to maximizing the potential of all employees.

ODI offers the following services to all MARTA employees:

- Individual and Group Counseling on civil rights and employee responsibilities
- Conflict Resolution and Mediation Services
- Management Consultations on EEO concepts and applications
- Diversity Initiatives to increase cultural awareness
- Complaint Investigations, Determinations, and Corrective Actions
- Guidance on the Affirmative Action Plan and Compliance reports for Title VI/VII
- Coordination of the Americans with Disabilities Act (activities) and monitoring Authority-wide Compliance
- Training on Prevention of Sexual Harassment, Valuing Diversity/Respect in the Workplace, ADA Sensitivity, and Lawful Interviewing Techniques in conjunction with the Human Resource Department
- Assistance with reasonable Disability or Religious Accommodations

For assistance or review of MARTA's Diversity and Inclusion Program and if you wish to file a complaint, you have a right to do so by contacting Paula Nash, Executive Director of the Office of Diversity and Inclusion at 404-848-5240 or pmnash@itsmarta.com. Retaliation against individuals engaging in protected activity is strictly prohibited.


 Collie J. Greenwood
 Interim General Manager/Chief Executive Officer

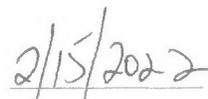

 Date

EXHIBIT 2

**Executive Leadership
Organizational Chart**

FY2022 ORGANIZATION CHART



METROPOLITAN ATLANTA RAPID TRANSIT AUTHORITY

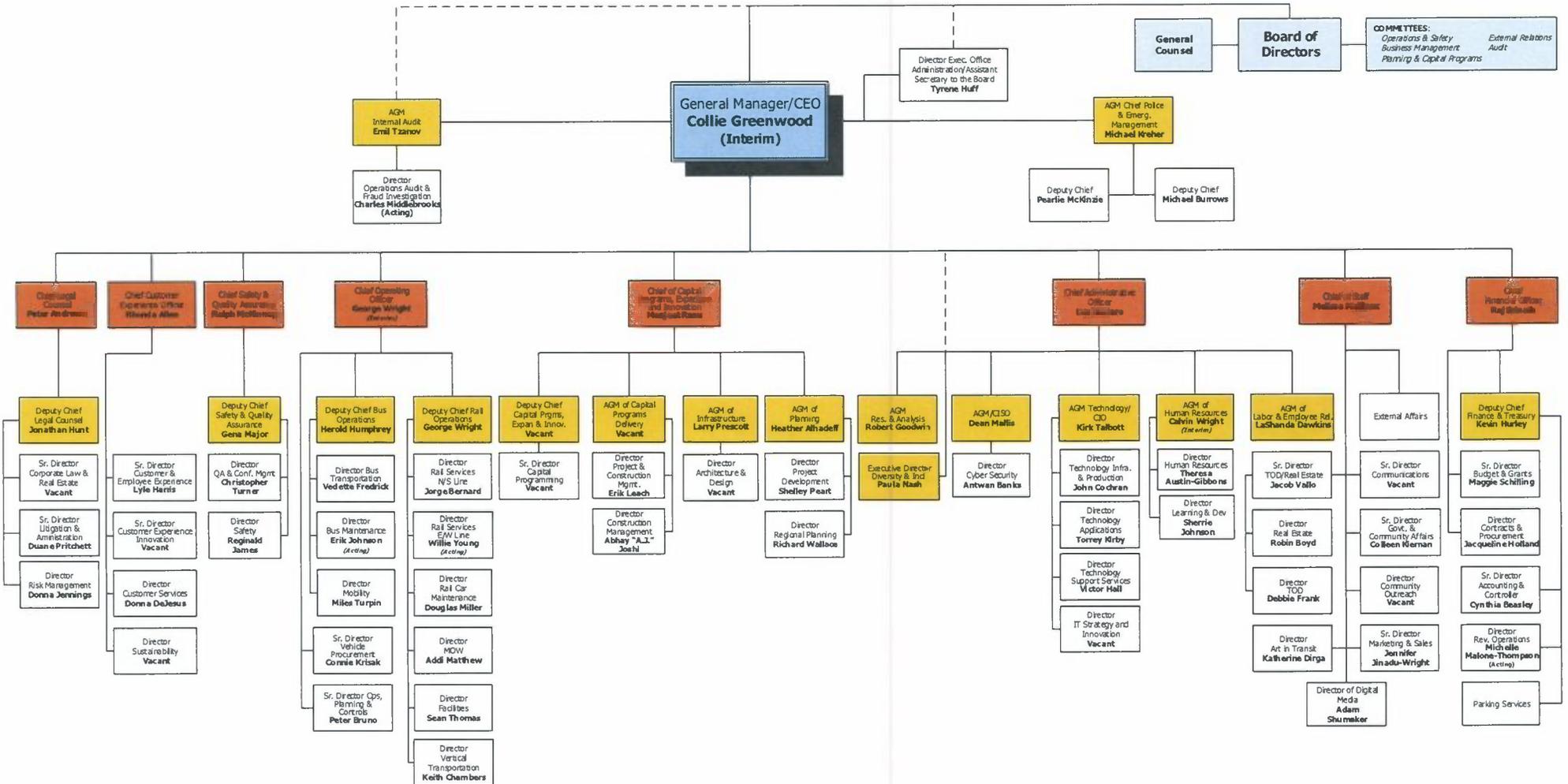


EXHIBIT 3

Equal Employment Opportunity Recruiting Statement

MARTA is an Equal Opportunity Employer and does not discriminate against any employee or applicant for employment because of race, color, sex, age, national origin, religion, sexual orientation, gender identity and/or expression, status as a veteran, and basis of disability or any other federal, state or local protected class.

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Description

Position Title Accountant II
 Location Atlanta, GA, US
 Organization Name Accounting - General Accounting
 Date Start 20-Feb-2022
 Closing Date 13-Mar-2022

Qualifications

EDUCATION and/or EXPERIENCE

Bachelor's degree in Accounting, Finance, or related field and two years of professional accounting experience. Designation as a Certified Public Accountant or a master's degree in a related field can substitute for one-year of experience. Good analytical and interpersonal skills and a broad understanding of the fundamental theories, doctrines, and principles of accounting are required. MS Office skills and experience with online financial systems required. In lieu of a degree, experience may be substituted on a year-for-year basis.

Basic Functions

SUMMARY

Under the general direction of Senior Cost Analyst and with a comprehensive knowledge of accounting theory, principles, and practices, performs a variety of complex functions in accordance with generally accepted accounting principles (GAAP), MARTA policies and procedures and federal and state regulatory requirements; Interprets record and analyzes financial transactions and prepares reports using Metify activity based costing software and various Oracle Enterprise Resource Planning (ERP) modules, including General ledger, Assets, Payables, Payroll, Labor Distribution, Investments, Projects and Receivables/Revenue. Reconciles financial data interfaced from other systems, including the Breeze fare system and the Enterprise Asset Management (EAM) FASuite. Reconciles voluminous multi-million-dollar transactions from subsidiary ledgers to general ledger control accounts, including banking, investment, sales tax bonds, revenue, activity-based costing, project and asset activity

ESSENTIAL DUTIES AND RESPONSIBILITIES

1. Performs financial analysis in assigned area to support preparation of Office's production of biweekly, monthly, quarterly and annual financial reports and the Comprehensive Annual Financial Reports (CAFR) with a

total of \$1.3 billion net assets. Prepare Multi-Million Dollar journal entries for month-end and year-end accruals.

2. Records and analyzes accounting activity via journal entries and maintains integrity of complex financial subsystems, including investments, inventory, accounts receivable, payables, payroll, assets, projects and activity-based costing.
3. Analyzes and records revenue from various sources (FTA and State of Georgia grants, the local sales tax, Breeze Fare system, real estate leases, lease leaseback activity and advertising) in compliance with MARTA policies and procedures, GAAP and statutory requirements.
4. Determines proper account classifications, verifies authorization and approves funding in processing disbursements to vendors. Maintains contract payment record for Board approved multi-million-dollar contracts and provides records to internal and external auditors as requested.
5. Supports the Payroll accounting function in accurately processing the biweekly payroll for MARTA's 4,600+ employees, determining third party deductions and performing tax reporting requirements in accordance with MARTA policies and procedures, the Amalgamated Union contract agreement and applicatory Federal and State statutory requirements.
6. Analyzes financial transactions of multi-million-dollar sales tax bonds and other creative capital financing transactions to assure proper reporting. Analyzes bank activities in the complex concentration account. Reconciles general ledger accounts against subsidiary ledgers and/or external sources.
7. Extracts information from the Oracle ERP system to determine whether applicable expenditures are capital or operating; maintains subsidiary fixed assets ledger and balances to general ledger; performs inventory of capital assets.
8. Performs research and analysis of revenue, expense and balance sheet accounts to ensure accuracy of accounting information.
9. Performs other duties as assigned.

Special Requirements

COMPUTER SKILLS

Ability to work in an ERP and/or EAM system. Must be skilled in Microsoft Word, Excel and Access. Must possess the ability to analyze financial accounting systems and ensure the accuracy of date.

CERTIFICATES, LICENSES, REGISTRATIONS

Designation as a Certified Public Accountant or a master's degree in a related field preferred.

Please be advised that a COVID-19 vaccination is a condition of employment. A copy of your COVID-19 Vaccination Record Card will be required on your employment start date. MARTA will make accommodations for medical and religious-based exemptions.

MARTA is an Equal Opportunity Employer and does not discriminate against any employee or applicant for employment because of race, color, sex, age, national origin, religion, sexual orientation, gender identity and/or expression, status as a veteran, and basis of disability or any other federal, state or local protected class.

Classification Exempt
Exempt

Number of Openings 1
Reports To SR COST ANALYST
SR COST ANALYST
Salary Range \$43,998-\$54,997-\$65,000
Salary Grade 00015
00015
Work Hours 37.5
Work Days
Posting Type Both Internal and External

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EXHIBIT 4

Office of Diversity and Inclusion Organizational Chart

OFFICE OF DIVERSITY & INCLUSION

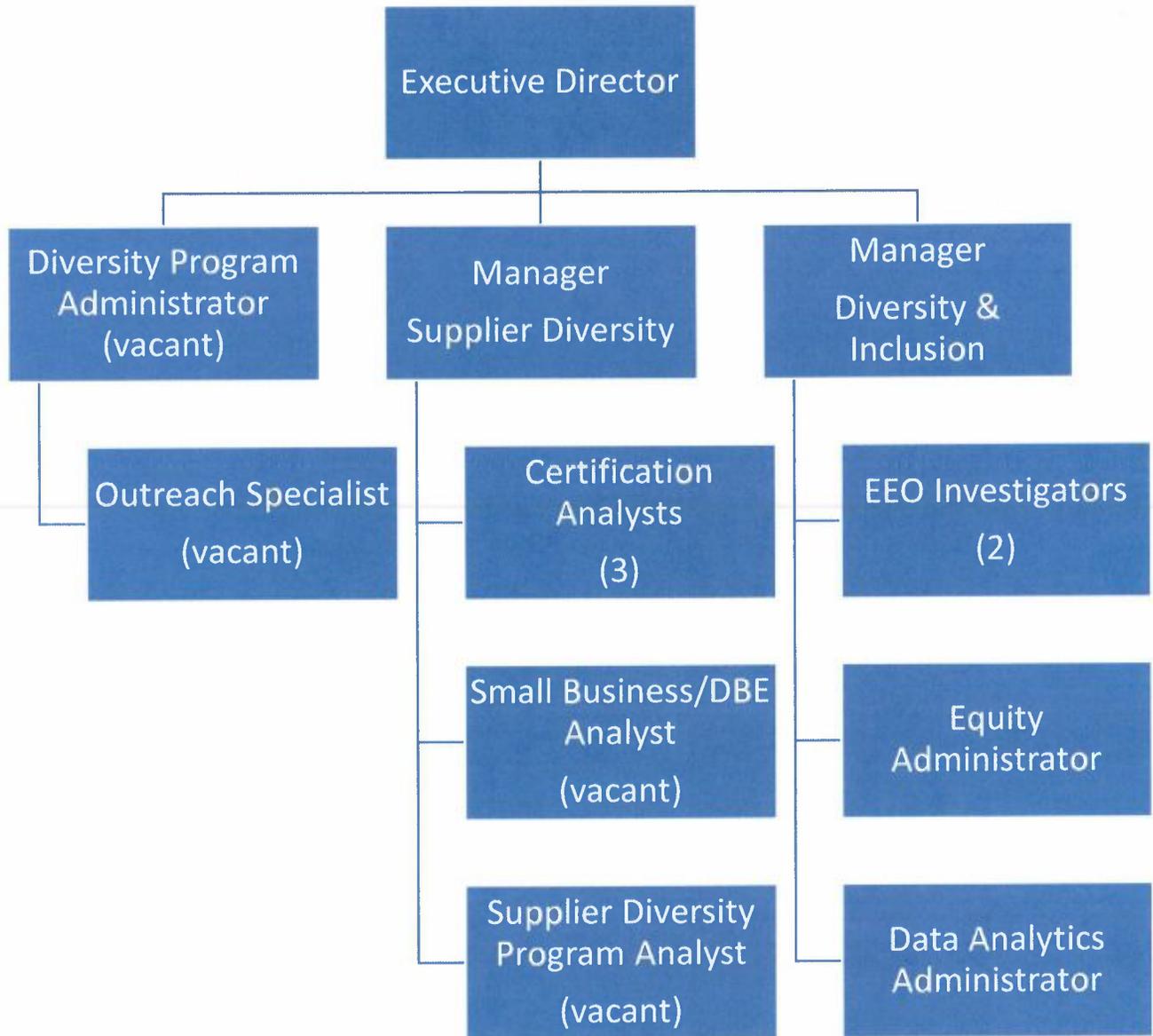


EXHIBIT 5

EEO Staff Job Descriptions

Metropolitan Atlanta Rapid Transit Authority Position Description

Job Code: 1EDR4452EN
Job Title: Executive Director of Diversity and Inclusion
Office: Diversity and Inclusion
Reports To: GM/CEO
FLSA Status: Exempt
Grade: 24
Approved By: DRE
Approved Date: 02/28/01
Revised: 5/25/16 - CW
Safety Sensitive: No

SUMMARY

Develops and implements diversity and inclusion strategies and equal employment opportunity (EEO) programs for the Authority and serves as the Chief Compliance Officer (CCO) for those programs. This position works in close collaboration with Executive Diversity Council to ensure that all decisions, activities, programs, policies, procedures, processes and services are equitable and do not discriminate (or adversely impact) current (or potential) employees, customers, communities, businesses, or stakeholders. This position provides oversight for the Authority's Americans with Disabilities Act (ADA), Affirmative Action (AA)/Equal Employment Opportunity (EEO) Program, Disadvantaged Business Enterprise (DBE) Program, Small Business Enterprise (SBE) Program, Supplier/Workforce Diversity, Title VI Program and Limited English Proficiency Plan, workplace violence prevention, conflict resolution and contract compliance.

The position monitors, tracks, evaluates and reports all matters pertaining to workforce diversity and regulatory compliance directly to the General Manager. The position ensures that the strategies and goals of the Authority and its business units are compliant with local, state, and federal regulations pertaining to equal employment opportunity, equity in service delivery, equal access to MARTA activities, disadvantaged/small business enterprise, cultural diversity and all aspects of the Americans with Disabilities Act (ADA). The position investigates, mediates, conciliates and seeks resolution of all complaints of inequitable treatment and allegations of discrimination and harassment.

ESSENTIAL DUTIES AND RESPONSIBILITIES

1. Leads the General Manager's Diversity and Inclusion Strategic Plan for the Authority to ensure that all decisions, activities, programs, policies, procedures, processes and services are equitable and do not discriminate (or adversely impact) current (or potential) employees, customers, communities, businesses, or stakeholders. Plans, develops, and oversees implementation of long and short-range EEO/DBE/SBE strategies and programs for the office to support the Authority's goals, objectives, and strategic plan.
2. Monitors the Authority's climate and advances strategies that demonstrate and promote

MARTA's commitment to serving as a diverse and inclusive equal opportunity employer and service provider.

3. Collaboratively consults with constituents, departments and all other MARTA work units to foster diversity inclusion, intercultural awareness, training programs and partnerships.
4. Serves as the Authority's Diversity and Inclusion Ambassador and may be required to represent the Authority to federal agencies, local groups and organizations, professional associations, and other similar groups.
5. Oversees and directs the investigation, mediation, and resolution of all complaints of inequitable treatment, as well as allegations of discrimination and harassment on behalf of the General Manager/CEO. Develops relevant policies and procedures that effectively and efficiently ensure equitable treatment and equal access to the benefits of employment and/or service delivery are carried out in a non-discriminatory manner.
6. Responsible for implementation of the Authority's Americans with Disabilities Act, Disadvantaged/Small Business Enterprises, Supplier Diversity, Title VI/Environmental Justice Program, Equal Employment Opportunity, Workforce Diversity, Affirmative Action and, Limited English Proficiency Programs. Establishes procedures to ensure that the Authority's staff and contractors comply with applicable policies, procedures and federal regulations.
7. Maintains accurate records and reporting according to all applicable laws of federal, state, and local statutes dealing with equal and/or equity in the provision of transit services pursuant to Title VI of the Civil Rights Act of 1964.

SUPERVISORY RESPONSIBILITIES

Primary duty is the management of an Office of the Authority. Directs and manages staff of managers and professionals. Interviews, hires and develops subordinate personnel; sets standards and evaluates performance of employees; provides feedback, coaches, disciplines and discharges as appropriate.

SAFETY RESPONSIBILITIES

Take every reasonable precaution given the circumstances to ensure the protection of employees, patrons, and members of the public. Identify and inform employees of hazards in the workplace. Determines safe work methods and ensures that employees are notified of new and modified methods. Ensures that employees are trained on safety policies and procedures. Ensures that employees follow procedures. Responds to health and safety concerns of employees in a timely manner.

QUALIFICATIONS

To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

EDUCATION and/or EXPERIENCE

Bachelor's Degree in Business, Public Administration, or a related Social Sciences field. Advanced degree desirable. Minimum of 8 years experience planning and directing equal

employment opportunity, workforce diversity, affirmative action, human resources, contract compliance, ADA, employee relations, workplace violence prevention and/or minority/disadvantaged business enterprise programs. Extensive knowledge of federal, state, and local statutes dealing with equality and/or equity in the provision of transit services pursuant to Title VI of the Civil Rights Act of 1964. Must possess strong oral and written communication skills. A minimum of six years of experience successfully managing staff and/or programs involved in the above areas. In lieu of degree, directly related work experience may be substituted on a year-for-year basis.

LANGUAGE SKILLS

Ability to read, analyze, and interpret common scientific and technical journals, financial reports, and legal documents. Ability to respond to common inquiries or complaints from customers, regulatory agencies, or members of the business community. Ability to write speeches and articles for publication that conform to prescribed style and format. Ability to effectively present information to top management, public groups, and/or boards of directors.

MATHEMATICAL SKILLS

Ability to work with mathematical concepts such as probability and statistical inference, and fundamentals of plane and solid geometry and trigonometry. Ability to apply concepts such as fractions, percentages, ratios, and proportions to practical situations.

REASONING ABILITY

Ability to define problems, collect data, establish facts, and draw valid conclusions. Ability to interpret an extensive variety of technical instructions in mathematical or diagram form and deal with several abstract and concrete variables.

CERTIFICATES, LICENSES, REGISTRATIONS

Professional certification(s) in any of the following: SHRM Professional Human Resources (PHR) or Senior Professional Human Resources (SPHR); Certified Diversity Professional; Certified Diversity Executive (CDE); Cornell Certified Diversity Professional (CCDP) or any other related diversity/mediation certification would be a plus.

PHYSICAL DEMANDS

The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. While performing the duties of this job, the employee is regularly required to sit; use hands to finger, handle, or feel; reach with hands and arms; and talk or hear.

WORK ENVIRONMENT

The work environment characteristics described here are representative of those an employee encounters while performing the essential functions of this job. Work is ordinarily performed in a standard office environment.

AMERICANS WITH DISABILITIES ACT

If you are a qualified individual with a disability, you have a right to request that MARTA make reasonable accommodations in order to help you accomplish your work, which must still be performed in all its essential functions.

Metropolitan Atlanta Rapid Transit Authority Position Description

Job Title: Manager of Diversity & Inclusion
Job Code: 1MGR4453EN
Department: Human Resources
Reports To: Executive Director - Diversity & Inclusion
FLSA Status: Exempt
Grade: 21
Approved by: CW
Approved date: August - 2016
Revised: February – 2019
Safety Sensitive: No

SUMMARY

Responsible for planning, developing and implementing activities related to the creation and sustainability of the Authority's diversity, inclusion, accessibility and equal employment opportunity (EEO) and affirmative action (AA) programs. Monitors and reviews agency practices, policies and programs to ensure organizational efforts are aligned to promote equitable employment and an inclusive and diverse workforce. Ensures that programs and activities are designed to address the needs of the organization as they relate to EEO/AA (Equal Employment Opportunity/Affirmative Action), ADFA (Age Discrimination in Employment Act), ADA (Americans with Disabilities Act), Environmental Justice, Sections 503 and 504 of the Rehabilitation Act, and guidelines established by Title VI, Title VII and Federal Transit Administration (FTA). Collaboratively partners with internal/external stakeholders to develop strategies, processes and programs to proactively foster diversity engagement. Compiles, analyzes and maintains EEO and diversity statistical data necessary for FTA reporting and regulatory requirements, laws, and court agreements.

ESSENTIAL DUTIES AND RESPONSIBILITIES

1. Manages all EEO, Title VI and accessibility programs.
2. Translates strategy into specific actions with clear accountability; makes decisions based on best available information; and communicates priorities clearly and concisely to management.
3. Works with various HR functions to ensure that processes are in place to maintain the appropriate data necessary for EEO and Diversity reporting.
4. Develops training schedules to educate employees and managers on how to recognize, accommodate and appreciate individual differences and how these can be bridged back to assist in meeting the Authority's strategic goals.
5. Manages the development and updating of the EEO/AA, Title VI and Limited English Proficiency (LEP) Programs; and oversees the responsibilities of such programs.
6. Plans, develops and implements programs and activities that address the needs of the organization as they relate to Equal Employment Opportunity/Affirmative Action (EEO/AA), Americans with Disabilities Act (ADA), Environmental Justice, Title VI and Title VII guidelines, and the Federal Transit Administration's guidelines.
7. Collaborates with constituents to create strategies and tools to develop our leaders, managers, and staff, increasing individuals' intercultural competencies and institutional knowledge about issues associated with inclusion.
8. Collects, analyzes, and presents data to the Executive Director for reporting to the Federal Transit Administration, the General Manager/Chief Executive Officer, and other sources as required. Maintains accurate records and files based on regulatory requirements, laws, and court agreements.
9. Develops strategic relationships with internal and external groups that develop policies, procedures, practices, training workshops, trend analyses and programs. Reviews agency publications, policies, procedures, and practices that have the potential to raise Title VI, ADA, ADEA, Section 503 and Section 504, Environmental Justice and/or Title VII concerns.

10. Develops robust knowledge sharing mechanisms to ensure the Executive Director and colleagues are briefed and the principles of equality, diversity and inclusion are embedded and inform every aspect of the office's work.
11. Performs other duties as assigned.

SUPERVISORY RESPONSIBILITIES

Manages the D&I staff to include: Workforce Planning Administrator, Diversity-EEO Investigator, Equity Administrator and Mystery Customer Program Analyst.

SAFETY RESPONSIBILITIES

Takes every reasonable precaution given the circumstances to ensure the protection of employees, patrons, and members of the public. Identifies and informs employees of hazards in the workplace. Determines safe work methods and ensures that employees are notified of new and modified methods. Ensures that employees are trained on safety policies and procedures. Ensures that employees follow procedures. Responds to health and safety concerns of employees in a timely manner.

QUALIFICATIONS

To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. In addition, the incumbent must be able to cope with conflicting points of view, function under pressure, and demonstrate discretion, integrity, fair-mindedness, and a persuasive, congenial personality. The requirements listed below are representative of the knowledge, skill, and/or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

EDUCATION and/or EXPERIENCE

A bachelor's degree in Human Resources, Business and/or a related field is required. Seven years of directly related experience in managing the development and administration of diversity and inclusion related activities including but not limited to: the administration of practices, policies and procedures relating to EEO/AA, ADA, ADEA, Section 503 and Section 504, Title VI, Title VII and Cultural Diversity Initiatives. Knowledge of federal regulations and laws governing all affected areas (EEO/AA, Title VII, Title VI, ADEA, Workplace Violence Prevention, Cultural Diversity Initiatives, and ADA) is required. Must possess (5) years of experience with direct supervision of staff and their professional development. Excellent verbal and written communication skills are required. In lieu of degree, directly related work experience may be substituted on a year-for-year basis.

LANGUAGE SKILLS

Must lead and direct the preparation (inclusive of development) of presentations for the MARTA Board of Directors, CEO Team, special internal program committees, employee training groups, contractors doing work for MARTA, business associations, and community groups. Must also prepare presentations for local and national training programs such as the Conference of Minority Transportation Officials, American Public Transit Association, SHRM conferences, WTS and AAA training classes/workshops.

Must prepare letters and reports for the MARTA Board of Directors, CEO Team, Federal Transit Administration, Federal Department of Transportation, other transit entities, and agencies with which MARTA has developed liaisons, partnerships, co-operative agreements and/or memoranda of understanding, and various MARTA departments. Must prepare written responses to "Call for Papers" or articles from SHRM, the Conference of Minority Transportation Officials, and the American Public Transit Administration. Must prepare other written correspondence to complainants and witnesses, take written statements, and develop complaint reports.

MATHEMATICAL SKILLS

Ability to work with mathematical concepts such as probability and statistical inference, and fundamentals of plane and solid geometry and trigonometry. Ability to apply concepts such as fractions, percentages, ratios, and proportions to practical solutions.

REASONING ABILITY

Must be able to decipher and analyze conflicting information in a variety of situations where compliance and other standards are the criteria for decision making.

COMPUTER SKILLS

Must use Microsoft (1) Word to prepare letters, reports, position papers, articles, and training workshop materials; (2) Excel to set up schemes for monitoring and measuring programmatic status and success; (3) PowerPoint to develop presentations for conferences, MARTA Board reports, and training workshops.

CERTIFICATES, LICENSES, REGISTRATIONS

N/A

OTHER SKILLS AND ABILITIES

Ability to develop liaisons, partnerships, memoranda of understanding and co-operative relationships with diverse organizations, communities, and cultures. Ability to make recommendations to the Executive Director regarding complaints of discrimination, employee relations matter, and cultural diversity program activities that are based on applicable legal premises, best practices, and relevant evidence/information obtained during an investigation or survey. Ability to identify or detect a known pattern (a figure, object, word, or sound) that is hidden in other distracting material or seemingly unrelated events. Ability to verify that a MARTA project or program guarantees equal assess, equitable treatment and the equitable distribution of benefits to minorities and transit dependents. Ability to determine the environmental justice impacts of a MARTA project on the minority community, low income persons and transit dependents.

OTHER QUALIFICATIONS

Must have knowledge and understanding of the following:

1. Planning requirements and steps to develop and implement transportation improvement programs.
2. Equal Employment Opportunity Commission processes, procedures, and time frames for action.
3. Interview and investigation best practices and procedures.
4. Process for developing and implementing public policy, employee relations procedures, corrective programs that facilitate open and constructive communication, as well as, organizational interventions and problem solving.
5. Specialized EEO/AA audit and tracking programs and analytic techniques.
6. Business and management principles involved in strategic planning, resource allocation, human resource modeling, leadership technique, production methods, and coordination of people and resources.
7. The use of logic and reasoning to identify the strengths and weaknesses of alternative solutions, conclusions or approaches to problems.
8. Determining how a system should work and how changes in conditions, operations, and the environment will affect outcomes.

PHYSICAL DEMANDS

The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

While performing the duties of this job, the employee is regularly required to: Use hands to finger, feel, and talk or hear more than 75% of the time; stand/sit, reach with hands and arms, and lift up to 10 pounds 25% to 75% of the time; walk, climb or balance, stoop, kneel or crawl, and lift up to 50 pounds less than 25% of the time. Specific vision requirements include the ability to adjust and focus vision.

WORK ENVIRONMENT

The work environment characteristics described here are representative of those an employee encounters while performing the essential functions of this job.

AMERICANS WITH DISABILITIES ACT

If you are a qualified individual with a disability, you have the right to request that MARTA make reasonable accommodations in order to help you accomplish your work, which must still be performed in all

its essential functions.

Metropolitan Atlanta Rapid Transit Authority Job Description

Job Title: Equity Administrator
Job Code: 1PRO3510EN
Department: GM/Diversity & Inclusion
Reports To: Manager of Equal Opportunity & Conflict Resolution
FLSA Status: Exempt
Grade: 19
Approved By: B. Kirkland
Approved Date: November, 2002
Revised By: C. Williams
Revised Date: 12/14/15
Safety Sensitive: No

SUMMARY

Responsible for the administration and compliance management of the Authority's plans and programs as it relates to: Title VI of the Civil Rights Act of 1964, Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act, Environmental Justice, Limited English Proficiency (LEP) requirements, civil rights legislation and FTA regulations. Performs audits and prepares comprehensive reports to track and measure the Authority's performance and compliance as it relates to Federally-regulated reporting requirements. Provides advisory and consultative assistance to Department personnel to ensure that Authority-wide policies, procedures, and programs are equitable, non-discriminatory, and comply with federal regulations.

ESSENTIAL DUTIES AND RESPONSIBILITIES

1. Administers the Authority's Title VI, Environmental Justice and Limited English Proficiency plans/programs in a fair, consistent and non-discriminatory manner.
2. Provides advisory and consultative assistance to Department personnel in the interpretation and implementation of all policies and procedures pertaining to Title VI programs that include ADA/Section 504 and LEP.
3. Audits and monitors the administration of program policies, practices and procedures to ensure equity and nondiscrimination in the delivery of agency services, programs and benefits. Provides documentation for defense and makes recommendations, when necessary.
4. Monitors provisions of fixed bus, rail and para-transit services to ensure equitable accessibility and delivery of transit services and accommodations.
5. Conducts community outreach services with various social, economic, and minority and ethnic interest groups in efforts to ensure that MARTA's commitment to equity, diversity and inclusion is achieved through its plans and services.
6. Serves as a liaison with local, state and national committees, civic groups and organizations to foster partnerships regarding issues of Environmental Justice, Limited English Proficiency and Title VI.
7. Maintain local labor force data and other pertinent statistical information to advise and assist sub-recipients/contractors toward implementation of Title VI programs.
8. Monitors and ensures that all documents and materials of the Authority are alternatively formatted (braille or other languages) as needed.

9. Maintains customer service-related ADA and Title VI complaints/allegations and researches and resolves matters in a timely manner. Prepares files for investigations and compiles and analyzes data for federally regulated reporting.
10. Performs other duties as assigned.

SUPERVISORY RESPONSIBILITIES

None

QUALIFICATIONS

The successful candidate must possess exceptional written, oral, group and interpersonal communication skills for coordinating collaborative efforts and maintaining effective working relationships; excellent project coordination skills and presentations skills. The candidate selected for this position must be self-directed, self-motivated and can prioritize and keep projects on task and on time. A thorough knowledge of Title VI, Limited English Proficiency, equal opportunity, ADA and civil rights laws, statutes, and regulations are essential for peak performance in this position. A high level of technical expertise demonstrated through advanced problem solving, planning, investigative and analytical skills are critical for successful development and administration of compliance programs. To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

EDUCATION and/or EXPERIENCE

Bachelor's degree in Human Resources, Legal Affairs, Public Administration or related field and five (5) years of directly related experience in federal civil rights compliance, Transit Authority work experience desired. Directly related experience required in the areas of administering the Americans with Disabilities Act, Title VI of Civil Rights Act of 1964, Environmental Justice and Limited English Proficiency in a legal, human resources, or transit environment. Must possess excellent written and verbal communication skills along with a minimum of two (2) years of supervisory experience. In lieu of degree, directly related experience may be substituted on a year for year basis.

LANGUAGE SKILLS

Ability to read, analyze, and interpret common scientific and technical journals, financial reports, planning documents, statistical census data, demographic profiles and legal documents. Ability to respond to common inquiries or complaints from customers, regulatory agencies, or members of the business community. Ability to write speeches and articles for publication that conform to prescribed style and format. Ability to effectively present information to top management, public groups, and/or boards of directors.

MATHEMATICAL SKILLS

Ability to work with mathematical concepts such as probability and statistical inference, and fundamentals of plane and solid geometry and trigonometry. Ability to apply concepts such as fractions, percentages, ratios, and proportions to practical situations.

REASONING ABILITY

Ability to solve practical problems and deal with a variety of concrete variables in situations where only limited standardization exists. Ability to interpret a variety of

instructions furnished in written, oral, diagram, or schedule form.

CERTIFICATES, LICENSES, REGISTRATIONS

None Required

PHYSICAL DEMANDS

The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

WORK ENVIRONMENT

The work environment characteristics described here are representative of those an employee encounters while performing the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

AMERICANS WITH DISABILITIES ACT

If you are a qualified individual with a disability, you have a right to request that MARTA make reasonable accommodations in order to help you accomplish your work, which must still be performed in all its essential functions.

**Metropolitan Atlanta Rapid Transit Authority
Position Description**

Job Title: Data Analytics Administrator
Job Code: 1PRO4704EN
Department: GM/CEO
Reports To: Manager of Diversity & Inclusion
FLSA Status: Exempt
Grade: 19
Approved By: DRE
Approved Date: 02/28/01
Safety Sensitive: No
Revised: 19-Feb-21 - CW

SUMMARY

Ensures that Authority-wide policies, procedures and practices comply with MARTA and governmental equal employment opportunity and affirmative action requirements. Prepares and monitors the Affirmative Action Plan of the Authority to ensure its successful implementation. Educates employees on equal employment opportunity, cultural diversity and affirmative action requirements, applications and initiatives. Provides consultation or expert advice to management. Monitors the Authority's Mystery Customer Program. Processes and analyzes mystery customer data using statistical methods. Serves as liaison for respective operations departments in providing and conducting comprehensive statistical analysis of daily related performance indicators. Reports mystery customer information to the CEO Team and Board of Directors and provides continual assessment of performance standards and associated financial implications. Conducts quarterly validation of consultant findings and submits conclusions to other MARTA departments and various committees.

ESSENTIAL DUTIES AND RESPONSIBILITIES

1. Maintains knowledge of the Authority's EEO policies, relevant federal, state and local laws and regulations, and disseminates information to management. Monitors the implementation of the Affirmative Action plan, including the achievement of employment goals.
2. Prepares various statistical reports and analyses pertaining to MARTA's workforce including applicants for employment, new hires, promotions, testing, training, transfers, voluntary and involuntary termination and salary adjustments.
3. Performs complex data analysis to develop presentations for the Director on matters as it relates to research findings, annual updates of the underutilization analysis, including relevant workforce data availability by race, sex, job classification and organizational unit.
4. Identifies job categories where underutilization exists in relation to their availability in the relevant labor market. Conducts detailed narrative and statistical assessments of employment practices that may contribute to underutilization.
5. Develops goals and timetables to correct employment practices that contribute to underutilization.
6. Analyzes demographic data and trends to forecast workforce planning needs and develops strategies to promote a diverse workforce and inclusive workplace.
7. Makes recommendations regarding the adoption of employment goals for inclusion in the Authority's Affirmative Action Plan; and in conjunction with HR administration.
8. Facilitates the development of EEO awareness training to educate management and employees on affirmative action goals and equal opportunity policies and principles.

9. Monitors the Mystery Customer Program by overseeing data collection efforts, compliance methodology and ensuring that shops related to ADA non-compliance are reported within twenty-four hours so that timely actions may be taken.
10. Processes and analyzes Mystery Customer data using statistical methods. Oversees the development and change of survey mechanisms through which the Authority's responsible parties will be able to receive information regarding non-compliance issues within twenty-four hours of the shop.
11. Conducts quarterly validation of consultant findings and submits conclusions to various departments and committees.
12. Collects ADA-related data from various departments and combines it with Mystery Customer data to develop quarterly reports for federal court monitors.
13. Performs other duties assigned.

SUPERVISORY RESPONSIBILITIES

None

SAFETY RESPONSIBILITIES

Take every reasonable precaution given the circumstances to ensure the protection of employees, patrons, and members of the public. Identify and inform employees of hazards in the workplace. Determines safe work methods and ensures that employees are notified of new and modified methods. Ensures that employees are trained on safety policies and procedures. Ensures that employees follow procedures. Responds to health and safety concerns of employees in a timely manner.

QUALIFICATIONS

To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

EDUCATION and/or EXPERIENCE

Bachelor's degree in Human Resources, Business Administration, Marketing, Statistics or a related field and a minimum of 5 years experience in human resources, market research, data analysis or EEO. Experience must include the design and implementation of qualitative and quantitative research methods. Highly effective verbal, written, analytical and problem-solving skills required. One-year experience performing related work in the transportation industry preferred. Extensive working knowledge required of federal, state laws, regulations, policies and guidelines relating to EEO. Must possess intermediate to advanced computer skills. In lieu of degree, directly related experience may be substituted on a year for year basis.

LANGUAGE SKILLS

Ability to read, analyze, and interpret common scientific and technical journals, financial reports, and legal documents. Ability to respond to common inquiries or complaints from customers, regulatory agencies, or members of the business community. Ability to write speeches and articles for publication that conform to prescribed style and format. Ability to effectively present information to top management, public groups, and/or boards of directors.

MATHEMATICAL SKILLS

Ability to work with advanced mathematical concepts such as probability and statistical inference using descriptive statistical methods, regressions, correlations, and factor analysis. Ability to apply concepts such as fractions, percentages, ratios, and proportions to practical situations.

REASONING ABILITY

Ability to solve practical problems and deal with a variety of concrete variables in situations where only limited standardization exists. Ability to interpret a variety of instructions furnished in written, oral, diagram, or schedule form.

CERTIFICATES, LICENSES, REGISTRATIONS

None Required.

PHYSICAL DEMANDS

The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job.

While performing the duties of this job, the employee is regularly required to sit; use hands to finger, handle, or feel; reach with hands and arms; and talk or hear.

WORK ENVIRONMENT

The work environment characteristics described here are representative of those an employee encounters while performing the essential functions of this job. Work is ordinarily performed in a standard office environment. Must be able to conduct site visits to satellite work locations and garages.

AMERICANS WITH DISABILITIES ACT

If you are a qualified individual with a disability, you have a right to request that MARTA make reasonable accommodations in order to help you accomplish your work, which must still be performed in all its essential functions.

Metropolitan Atlanta Rapid Transit Authority Job Description

Job Title: Diversity and Equal Opportunity Investigator
Job Code: 1PRO3402EN
Department: GM/CEO
Reports To: Manager - Diversity & Inclusion
FLSA Status: Exempt
Grade: 17
Approved By: S. Jones
Approved Date: November 8, 2004
Revised: 06/15/18 - CW
Safety Sensitive: No.

Summary

Leads and conducts workplace investigations for the Office of Diversity & Inclusion regarding complex and sensitive equal employment matters with an emphasis on discrimination, sexual harassment, employment policy violations and retaliation allegations. Coordinates investigative research (i.e. interviews, fact finding, etc.) needed to evaluate, mitigate and resolve complaints. Provides employee counseling, management guidance and agency training on policies and procedures that pertain to equal employment opportunity. Addresses external equal opportunity concerns related to customer inquiries, complaints, charges and investigations. Provides proper management of caseload reporting and tracking. Prepares written findings, conclusions and recommendations of resolutions for internal and external investigations. Monitors, analyzes, and tracks data trends. Ensures that employment practices, policies, and procedures are consistently and fairly applied in a manner that promotes an inclusive and diverse workforce.

Essential Duties and Responsibilities

1. Conducts formal intake of internal/external equal employment opportunity complaints. Assesses complaint and determines the most appropriate resolution process and/or procedural protocol to be followed.
2. Leads and conducts well-documented and impartial investigations of discrimination, sexual harassment and related retaliation complaints in accordance with MARTA's Non-Discrimination and Anti-Harassment Policy and Compliant Procedures and all applicable federal, state and local regulations.
3. Develops and documents action plans for investigations. Determines, gathers and analyzes evidentiary information to evaluate claims. Identifies and interviews complainant, witnesses and respondent(s) to accurately document investigation findings, facts and relevant information in accordance with the Office of Diversity & Inclusion process format.
4. Prepares written findings, conclusions and recommendations for complaint remediation and resolution. Provides regular updates to Manager - Diversity & Inclusion and the Executive Director – Diversity & Inclusion regarding case management approach, status and progress.

5. Provides consultation, subject matter expert guidance and education to employees, management and customers on discrimination, sexual harassment, retaliation, policy violations and options for complaint resolution.
6. Collaborates with internal and external stakeholders and partners (as appropriate) in performing investigative research and resolution duties to address complaints and/or respond to charges raised by applicable agencies, organizations and constituencies (i.e. EEOC, FTA and DOL).
7. Proactively tracks and monitors internal and external complaints in order to perform data analytics. Generates and delivers reports in narrative, database, spreadsheet and other formats. Identifies root causes and trends. Provides recommendations to reduce complaints, mitigate risk and create a more inclusive culture.
8. Works in collaboration with internal business units to assist in the development and facilitation of equal employment opportunity compliance, diversity, and inclusion training.
9. Performs other duties as assigned.

Supervisory Responsibilities

N/A

Qualifications

To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

Education and/or Experience

Bachelor's degree in business administration, public administration, human resources or related field. Four years of progressively responsible experience as an EEO investigator, human resources professional or employee relations representative in a transit, governmental or related industry highly preferred. Experience must include a minimum of 2 years of investigating, counseling and/or providing conflict resolution and mediation on equal employment issues. Demonstrated ability to resolve conflict with culturally diverse individuals and employees at all levels of the organization required. Must possess excellent verbal and written communications skills. Knowledge of federal, state and local EEO laws, guidelines and procedures required. Demonstrated ability to effectively manage high-volume workload with competing priorities required. Must possess Microsoft Office proficiency and strong records management skills. Directly related work experience may be substituted on a year-for-year basis in lieu of a degree.

Language Skills

Ability to interpret, analyze, and advise on the application of EEO/AA laws and regulations to all employment issues. Ability to apply EEO/AA considerations when reviewing policies and procedures. Strong interpersonal and communications skills and the ability to work effectively with a wide range of constituencies in a diverse workforce. Interviewing and data collection skills. Ability to create, compose, and edit written materials. Ability to develop and present educational programs and/or workshops. Ability to write reports containing technical information. Ability to communicate

effectively, both verbally and writing. Records management skills. Knowledge of federal, state and local EEO/AA laws, guidelines and procedures. Ability to train diverse groups of employees.

Mathematical Skills

Ability to work with mathematical concepts such as probability and statistical inference, and fundamentals of plane and solid geometry and trigonometry.

Reasoning Ability

Ability to solve practical problems and deal with a variety of concrete variables in situations where only limited standardization exists. Ability to interpret a variety of instructions furnished in written, oral, diagram, or schedule form.

Physical Demands

The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

Work Environment

The work environment characteristics described here are representative of those an employee encounters while performing the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

EXHIBIT 6

2021 EEO-4 Report

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION				OMB Control No. 3046-0008	
STATE AND LOCAL GOVERNMENT INFORMATION REPORT (EEO-4) EEOC Form 164					
Control Number: 13502880 Reporting Year: 2021					
A. TYPE OF GOVERNMENT (Check one box only)					
<input type="checkbox"/> 1. State		<input type="checkbox"/> 2. County		<input type="checkbox"/> 3. City	
<input type="checkbox"/> 6. Other (Specify)				<input type="checkbox"/> 4. Township	
<input checked="" type="checkbox"/> 5. Special District					
B. IDENTIFICATION					
1. NAME OF POLITICAL JURISDICTION METRO ATLANTA RAPID TRANSIT					
2. MAILING ADDRESS		CITY/TOWN	COUNTY	STATE	ZIP
2424 PIEDMONT RD NE		ATLANTA	DEKALB	GA	30324
C. FUNCTION					
1. FINANCIAL ADMINISTRATION. Tax billing and collection, budgeting, purchasing, central accounting and similar financial administration carried on by a treasurer's, auditor's or comptroller's office and; GENERAL CONTROL. Duties usually performed by boards of supervisors or commissioners, central administration offices and agencies, central personnel or planning agencies, all judicial offices and employees (judges, magistrates, bailiffs, et al.)			8. HEALTH. Provision of public health services, outpatient clinics, visiting nurses, food and sanitary inspections, mental health, alcohol rehabilitation service, etc.		
			9. HOUSING. Code enforcement, low-rent public housing, fair housing ordinance enforcement, housing for elderly, housing rehabilitation, rent control.		
2. STREETS AND HIGHWAYS. Maintenance, repair, construction and administration of streets, alleys, sidewalks, roads, highways, and bridges.			10. COMMUNITY DEVELOPMENT. Planning, zoning, land development, open space, beautification, preservation.		
3. PUBLIC WELFARE. Maintenance of homes and other institutions for the needy; administration of public assistance. (Hospitals should be reported under function 7.)			11. CORRECTIONS. Jails, reformatories, detention homes, halfway houses, prisons, parole and probation activities.		
4. POLICE PROTECTION. Duties of a police department, sheriff's, constable's, coroner's office, etc. Including technical and clerical employees engaged in police activities.			<input checked="" type="checkbox"/> 12. UTILITIES AND TRANSPORTATION. Includes water supply, electric power, transit, gas, airports, water transportation and terminals.		
5. FIRE PROTECTION. Duties of the uniformed fireforce and clerical employees. (Forest fire protection activities should be reported under function 6.)			13. SANITATION AND SEWAGE. Street cleaning, garbage and refuse collection and disposal. Provision, maintenance and operation of sanitary and storm sewer systems and sewage disposal plants.		
6. NATURAL RESOURCES. Agriculture, forestry, forest fire protection, irrigation drainage, flood control, etc., and; PARKS AND RECREATION. Provision, maintenance and operation of parks, playgrounds, swimming pools, auditoriums, museums, marinas, zoos, etc.			14. EMPLOYMENT SECURITY. State governments only.		
			15. OTHER (Specify.)		
7. HOSPITALS. Operation and maintenance of institutions for inpatient medical care.					

D. EMPLOYMENT DATA AS OF JUNE 30										Function 12 - UTILITIES AND TRANSPORTATION						
1. FULL-TIME EMPLOYEES																
JOB CATEGORY	ANNUAL SALARY (in thousands 000)	RACE/ETHNICITY													TOTALS	
		HISPANIC OR LATINO		NOT-HISPANIC OR LATINO												
		MALE	FEMALE	MALE				FEMALE								
		WHITE	BLACK OR AFRICAN AMERICAN	ASIAN	NATIVE HAWAIIAN OR OTHER PACIFIC ISLANDER	AMERICAN INDIAN OR ALASKA NATIVE	TWO OR MORE RACES	WHITE	BLACK OR AFRICAN AMERICAN	ASIAN	NATIVE HAWAIIAN OR OTHER PACIFIC ISLANDER	AMERICAN INDIAN OR ALASKA NATIVE	TWO OR MORE RACES			
ADMINISTRATIVE SUPPORT	41. \$0.1 - 15.9			1	4					21	1				27	
	42. \$16.0 - 19.9				1					1					2	
	43. \$20.0 - 24.9									2					2	
	44. \$25.0 - 32.9		2		4					14					20	
	45. \$33.0 - 42.9	3	2	1	9		1		3	64					83	
	46. \$43.0 - 54.9		3	3	30	1	1		1	50	2				91	
	47. \$55.0 - 69.9				16					49					65	
	48. \$70.0 PLUS			1	1	1		1	1	2					7	
SKILLED CRAFT	49. \$0.1 - 15.9														0	
	50. \$16.0 - 19.9														0	
	51. \$20.0 - 24.9														0	
	52. \$25.0 - 32.9														0	
	53. \$33.0 - 42.9	1			8					2					11	
	54. \$43.0 - 54.9	14		11	161	11				8					205	
	55. \$55.0 - 69.9	24		72	337	37		6		13					489	
	56. \$70.0 PLUS														0	
SERVICE - MAINTENANCE	57. \$0.1 - 15.9														0	
	58. \$16.0 - 19.9														0	
	59. \$20.0 - 24.9	1	1	1	43					49			1		96	
	60. \$25.0 - 32.9				1										1	
	61. \$33.0 - 42.9	2	4	5	265	2			2	334					614	
	62. \$43.0 - 54.9	12	7	5	606	2		2	3	513	1				1151	
	63. \$55.0 - 69.9														0	
	64. \$70.0 PLUS														0	
65. TOTAL FULL-TIME (LINES 1-64)	99	38	252	2055	91	0	15	0	47	1504	17	0	4	0	4122	
2. OTHER THAN FULL-TIME EMPLOYEES																
66. OFFICIALS - ADMINISTRATORS															0	
67. PROFESSIONALS	1		5	13	4					4					27	
68. TECHNICIANS															0	
69. PROTECTIVE SERVICE			4	18					1	4					27	
70. PARAPROFESSIONALS															0	
71. ADMINISTRATIVE SUPPORT	1			6					2	8					17	
72. SKILLED CRAFT															0	
73. SERVICE - MAINTENANCE															0	
74. TOTAL OTHER THAN FULL-TIME (LINES 66 - 73)	2	0	9	37	4	0	0	0	3	16	0	0	0	0	71	

Control Number: 13502880

Reporting Year: 2021

Jurisdiction: METRO ATLANTA RAPID TRANSIT

D. EMPLOYMENT DATA AS OF JUNE 30										Function 12 - UTILITIES AND TRANSPORTATION				
		RACE/ETHNICITY												
HISPANIC OR LATINO		NOT-HISPANIC OR LATINO											TOTALS	
		MALE						FEMALE						
MALE	FEMALE	WHITE	BLACK OR AFRICAN AMERICAN	ASIAN	NATIVE HAWAIIAN OR OTHER PACIFIC ISLANDER	AMERICAN INDIAN OR ALASKA NATIVE	TWO OR MORE RACES	WHITE	BLACK OR AFRICAN AMERICAN	ASIAN	NATIVE HAWAIIAN OR OTHER PACIFIC ISLANDER	AMERICAN INDIAN OR ALASKA NATIVE		TWO OR MORE RACES
3. NEW HIRES DURING EEO-4 FISCAL YEAR (JULY 1 - JUNE 30)														
75. OFFICIALS - ADMINISTRATORS			2	2	1			1						6
76. PROFESSIONALS	1	1	11	20				1	30	1				65
77. TECHNICIANS		1	2	1					1					5
78. PROTECTIVE SERVICE			1	16	1				14					32
79. PARAPROFESSIONALS				1					1					2
80. ADMINISTRATIVE SUPPORT		2		6					11					19
81. SKILLED CRAFT	3		3	43	5				2					56
82. SERVICE - MAINTENANCE		1		54				1	89			1		146
83. TOTAL NEW HIRES	4	5	19	143	7	0	0	0	3	148	1	0	1	331
(LINES 75 - 82)														
E. DEPARTMENTS/AGENCIES INCLUDED IN THIS FUNCTION REPORT														
N/A														
F. DEPARTMENTS/AGENCIES NOT INCLUDED IN THIS FUNCTION REPORT														
G. REMARKS ABOUT THIS FUNCTION REPORT														

Control Number: 13502880

Reporting Year: 2021

Jurisdiction: METRO ATLANTA RAPID TRANSIT

SUMMARY OF FUNCTIONS			
1 - FINANCIAL ADMINISTRATION/GENERAL CONTROL			9 - HOUSING
2 - STREETS AND HIGHWAYS			10 - COMMUNITY DEVELOPMENT
3 - PUBLIC WELFARE			11 - CORRECTIONS
4 - POLICE PROTECTION		✓	12 - UTILITIES AND TRANSPORTATION
5 - FIRE PROTECTION			13 - SANITATION AND SEWAGE
6 - NATURAL RESOURCES/PARKS AND RECREATION			14 - EMPLOYMENT SECURITY
7 - HOSPITALS			15 - OTHER
8 - HEALTH			
COMMENTS			
CERTIFICATION. I certify that the information given in this report is correct and true to the best of my knowledge and was reported in accordance with accompanying instructions. (Willfully false statements on this report are punishable by law, US Code, Title 18, Section 1001.)			
NAME OF CERTIFYING OFFICIAL Adoraeu Jouett		TITLE Manager	
MAILING ADDRESS 2424 PIEDMONT RD NE ATLANTA GA, 30324		TELEPHONE NUMBER 404-848-4423	
DATE 12/8/2021	EMAIL ADDRESS ajouett@itsmarla.com		TYPED NAME Adoraeu Jouett

EXHIBIT 7

Human Resources Policies



DEPARTMENTAL PROCEDURE

REFERENCE NUMBER

TITLE

RECRUITING-POSTING/ADVERTISING A POSITION

I.B

POLICY

1. Position vacancies should be posted/advertised internally for seven (7) calendar days in areas visible to all MARTA employees. Current MARTA employees may apply for any posted/advertised position for which they qualify.
2. The position may be advertised externally concurrent with internal postings at MARTA's discretion.
3. Concurrent advertising may be requested by the hiring Authority and approved by the Manager of Recruiting.
4. Positions may be posted/advertised using whatever means is deemed most effective in attracting qualified candidates in sufficient numbers to meet hiring needs and provide adequate commitment to equal opportunity employment.

The Hiring Authority is responsible for completing a Requisition for Personnel form. The Requisition for Personnel must represent a request to fill a new requirement or a replacement for a vacant position(s). The Requisition for Personnel form must be signed and approved by the Office of Financial Planning and Analysis.

The Compensation Branch is responsible for reviewing all requisitions for additional or replacement personnel and will verify whether the requisition(s) represent a new requirement or a replacement position.

For either a new requirement or a replacement position they will do the following:

- Assure position is approved, budgeted, and vacant
- Assist hiring Manager in developing job description if job is new or changed
- Evaluate job if ungraded
- Forward approved requisition to the Recruiting Branch for review and posting.

REVISION NO.	ISSUE DATE	REVIEW DATE	PREPARED BY	APPROVED BY
3	4/10/07		Human Resources	<i>Barbara Kirkland</i>

PAGE 1 OF 2

EXCEPTIONS TO POSTING/ADVERTISING POLICY

The following chart shows the times when a position need not be posted.

JOB NOT POSTED WHEN	CONDITIONS
Transfer within the Division/Department	<ul style="list-style-type: none"> No increase in salary or salary grade Approval of Hiring Authority/Department Head and Director of Compensation, Recruiting and Support Services is required Affirmative Action goals are met
Voluntary/Involuntary Demotion with Division/Department	<ul style="list-style-type: none"> Approval of the Hiring Authority and/or Department head Approval of the Director of Compensation, Recruiting and Support Services
Established approved career progressions	<ul style="list-style-type: none"> Employee received a minimum rating of satisfactory on most recent appraisal Employee has received no significant disciplinary actions within last six months
Employee displaced due to reduction in staff or disability beyond employee's control	<ul style="list-style-type: none"> Employee received a minimum rating of satisfactory on most recent appraisal Employee has received no significant disciplinary actions within last six months
Regular employee can fill the position on a temporary basis (Acting or relief assignment)	<ul style="list-style-type: none"> Temporary assignment should not exceed six months unless approved by the Director of Compensation, Recruiting and Support Services Additional compensation may be given when approved by the Director of Compensation, Recruiting and Support Services
Contract/Temporary Clerical Pool Employees	<ul style="list-style-type: none"> Approval of Director of Compensation, Recruiting and Support Services is required Appointed under a letter of agreement for up to six months, renewable in increments of six months or less and terminable at will by hiring Department.
General Manager/CEO Team appointments (Director and above)	<ul style="list-style-type: none"> Employee received a minimum rating of satisfactory on most recent appraisal Employee has received no significant disciplinary actions within last six months
Reclassification of a Position	<ul style="list-style-type: none"> Core functions of the position have not changed Reporting relationship (level) of the position has not changed



METROPOLITAN ATLANTA RAPID TRANSIT AUTHORITY

RECRUITING

SCREENING OF

APPLICANTS

PREPARED BY: HUMAN RESOURCES - RECRUITING

DIRECTOR: STEVEN B. McCLURE

DATE: DECEMBER 2020



METROPOLITAN ATLANTA RAPID TRANSIT AUTHORITY

 PROCEDURE	ISSUE DATE 12-31-2020	REFERENCE NO. HR-PPO-1040	Page 2 of 5
TYPE: RECRUITING – Screening of Applicants			

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	<i>B. Purpose</i>	3
	<i>C. Review</i>	3
	<i>D. Applicability</i>	3
	<i>E. Responsibilities</i>	3
II.	Process	3
III.	Process Flow	4
IV.	Hiring Authority Responsibilities	5
V.	Supporting Documents	5

 PROCEDURE	ISSUE DATE 12-31-2020	REFERENCE NO. HR-PPO-1040	Page 3 of 5
TYPE: RECRUITING – Screening of Applicants			
ISSUING DEPARTMENT: Human Resources			
PREPARED BY: Director, Human Resources			
APPROVED BY:			
Steven B. McClure <i>Director of Human Resources</i>		DocuSigned by:  1/24/2021 <small>A368GDBB28E7E4BA...</small> Signature Date	
LaShanda R. Dawkins <i>Assistant General Manager of Human Resources</i>		DocuSigned by:  1/24/2021 <small>87E39EC22EE7499...</small> Signature Date	
SUPERSEDES: RECRUITING – Screening of Applicants, I.D.			

I. General

A. Scope

This document covers the criteria that the applicant is reviewed on.

B. Purpose

The purpose of the Screening of Applicants Procedure is to provide guidance on required qualifications that candidates must meet.

C. Review

The contents of this document will be reviewed on **12-31-2022** and **06-30** of each odd numbered year, thereafter. The **Recruiting Manager** and the **Director of Human Resources** will review this document with recommendations for revisions forwarded to the **Assistant General Manager of Human Resources** by **08-01**.

D. Applicability

This procedure shall apply to all MARTA employees.

E. Responsibilities

- Recruiting Officer
- Hiring Manager

II. Process

This procedure is performed whenever applications and/or resumes are being screened. The screening process is the primary responsibility of the recruiting officer. Applications and/or resumes may be screened using the following criteria:

 PROCEDURE	ISSUE DATE 12-31-2020	REFERENCE NO. HR-PPO-1040	Page 4 of 5
TYPE: RECRUITING – Screening of Applicants			

- Written or performance testing proposed
- Interviewing in person or by teleconference/video
- Evaluation of education, training and experience (see note below)
- Employment verifications and criminal background investigations
- Physical examination
- Performance and/or attendance records

III. Process Flow

The recruiting officer will evaluate the applicant's qualifications to determine if they meet the minimum qualifications for the positions. All eligible internal applicants meeting the minimum qualifications will be forwarded to the hiring manager for interview consideration. All applicants will be notified if they meet or do not meet the minimum qualifications with a status update through oracle I-recruitment.

NOTE: In order to recognize individual achievements and to promote the use of tuition reimbursement as an available benefit to career advancements, HR will grant credit towards the required experience for a specific position as follows:

- If the position requires an Associate degree and the applicant was awarded a bachelor's degree in an unrelated discipline, 1 year of experience will be credited; 2 years will be credited for a related degree.
- If the position requires a bachelor's degree and the applicant was awarded an associate degree in an unrelated discipline – 1 year of experience will be credited; 2 years of experience will be credited for a related degree.
- If the applicant was awarded a bachelor's degree in an unrelated discipline, 2 years of experience will be credited.
- If the position requires a bachelor's degree and the applicant was awarded a master's degree in the same discipline, 2 years of experience will be credited. If the master's degree is not related, 1 year of experience will be credited.

**These considerations will only be given if an in lieu of clause applies to the position.

**No more than two years of experience will be awarded to an applicant based on educational credentials. Part-time experience will be prorated and credited in lieu of, but not in addition to, full-time experience during the same period.

**Educational credentials must be substantiated by original documentation and will be verified by the Recruiting Officer.

marta  PROCEDURE	ISSUE DATE 12-31-2020	REFERENCE NO. HR-PPO-1040	Page 5 of 5
TYPE: RECRUITING – Screening of Applicants			

IV. Hiring Authority Responsibilities

The Hiring Authority will review only the resumes forwarded by the Recruiting Branch for interview consideration. The Hiring Authority is not required to interview all the internal/external applicants meeting the minimum qualifications. Hiring Authority includes any department, office, business unit, committee, group, individual, or designated entity responsible with making a hiring decision.

V. Supporting Documents

- Recruiting Standard Operating Procedures

POLICY

When the Hiring Authority makes a selection, he or she obtains agreement from the Department Head concurring with the decision and then submits to the Manager of Recruiting a selection package that will include the following:

- Selection and recommendation memorandum detailing the rationale for selecting the recommended applicant
- Applicant Evaluation Form for each applicant interviewed
- If a panel was used to interview the applicants, copy of the Interview Recommendation Memorandum from the panel chairperson stating exactly what action the panel was convened to complete
- The Applicant Flow Report
- Copy of interview questions of all applicants interviewed
- Any written exercises or tests applicants were required to complete
- The interview panel's or hiring manager's scoring matrix
- Summary report of the rating of each applicant
- Any other information or documentation pertinent to the interview and selection process

The Director of Compensation, Recruiting, and Support Services may require written or oral evidence in support of the selection should there be any questions are to the hiring decision.



DEPARTMENTAL PROCEDURE

REFERENCE
NUMBER

TITLE
RECRUITING-REVIEWING QUALIFICATION DECISIONS

I.F

POLICY

The Manager of Recruiting may convene a Qualifications Review committee comprised of the Executive Director of DEO, the Director of Compensation, Recruiting and Support Services, and a member of management familiar with the position under consideration to review any disqualification resulting from:

- Employee not meeting minimum qualifications for position
- Evidence obtained from the background investigation
- Falsification of education, training, or experience

The purpose of the committee shall be to provide additional objective oversight in sensitive hiring decisions. It can also act as a review for any case in which a question is raised as to application of screening criteria or a requirement for hiring. The decision of the committee shall be by majority vote and shall be recorded in writing and retained in the recruiting files for the position.

REVISION NO.	ISSUE DATE	REVIEW DATE	PREPARED BY	APPROVED BY	PAGE
2	11/01/03		Human Resources		1 OF 1

POLICY

The Recruiting Officer is responsible for assembling all necessary documentation in support of the hiring decision before extending an offer of employment. The package should contain the following:

- Selection package
- Approved requisition
- Copy of the Posting
- Copy of the Job Description
- Evidence of employment and education verification
- GCIC results (if required)
- Physical examination results (if required)
- Any clearances, licenses, certificates and needed or required

OFFER OF EMPLOYMENT

Once the package has been assembled, Offer of Employment, Offer of Promotion, or Offer of Transfer letter will be prepared.

The letter will detail the conditions of employment as follows:

- Starting salary
- Effective date
- Place and time to report for orientation or to work
- All other information needed by employee



METROPOLITAN ATLANTA RAPID TRANSIT AUTHORITY

CONDITIONS OF EMPLOYMENT

RESOLUTION OF EMPLOYEE COMPLAINTS

**PREPARED BY: EMPLOYEE RELATIONS
MANAGER: MICHAEL FYFFE
DATE: FEBRUARY 2022**

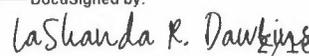


METROPOLITAN ATLANTA RAPID TRANSIT AUTHORITY

 PROCEDURE	ISSUE DATE 02-16-2022 Revision No: 05	REFERENCE NO. HR-PPO-4290	Page 2 of 6
TYPE: CONDITIONS OF EMPLOYMENT: Resolution of Employee Complaints			

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Employees	4
Managers and supervisors	4
II. Process	4
A. Employee's Right to File a Complaint	4
B. Types of Complaints Determinations	5
III. Summary of Investigation Process	5
IV. Complaint Determination	5
1. Reasonable Cause	6
2. No Reasonable Cause	6
3. Settlement	6
4. Withdrawn	6
5. Administrative Closure	6
6. Closed	6
V. Confidentiality	6

 PROCEDURE	ISSUE DATE 02-16-2022 Revision No: 05	REFERENCE NO. HR-PPO-4290	Page 3 of 6	
TYPE: CONDITIONS OF EMPLOYMENT: Resolution of Employee Complaints				
ISSUING DEPARTMENT: Labor & Employee Relations				
PREPARED BY: Employee Relations				
APPROVED BY:				
Michael Fyffe <i>Manager of Employee Relations</i>		DocuSigned by:  2/16/2022 <small>08062B846A6F4E7...</small> Signature Date		
LaShanda R. Dawkins <i>Assistant General Manager of Labor & Employee Relations</i>		DocuSigned by:  2/16/2022 <small>87E39EC22EE7499...</small> Signature Date		
SUPERSEDES: IV.Q-Resolution of Employee Complaints				

I. General

A. Scope

All Metropolitan Atlanta Rapid Transit Authority (MARTA) employees.

B. Purpose

The purpose of the Conditions of Employment-Resolution of Employee Complaints Procedure (Procedure) is to establish a process for handling and resolving internal complaints brought by employees who believe that they were mistreated, in violation of MARTA's Standards of Conduct Procedure. MARTA encourages the resolution of complaints at the department level. However, this Procedure shall address situations where parties are unable to reach resolution.

C. Limitations

Complaints related to the following type of issues are not covered under this Procedure: disparate treatment claims based on membership in an EEO protected class, annual performance evaluations (unless the employee proves preliminarily the evaluation to be arbitrary and capricious), probationary evaluations and terminations, Performance Improvement Plans (PIPs), involuntary separation of non-represented employees designated as "Employees at Will" under Georgia doctrines and laws, lay-offs, demotions, suspensions, transfers, reassignments, reductions in the workforce, job abolishment, decisions concerning the planning, direction or control of the MARTA operations, and Department of Human Resources position classification and salary decisions.

D. Review

The contents of this document will be reviewed on **06/30/2024** and **06/30** of each even number year, thereafter. The Manager of Employee Relations will review this document with recommendations for revisions forwarded to the Assistant General Manager of Labor and Employee Relations by **08/01**.

 PROCEDURE	ISSUE DATE 02-16-2022 Revision No: 05	REFERENCE NO. HR-PPO-4290	Page 4 of 6
TYPE: CONDITIONS OF EMPLOYMENT: Resolution of Employee Complaints			

E. Definitions

Term	Definition
Complainant	An employee who has filed a complaint with the Department of Labor & Employee Relations.
Internal Complaint	Written allegations by an employee that assert a violation of MARTA policy, procedure, and/or objects to conduct or behavior of a coworker or member of supervision.
Respondent	The party against whom a complaint is filed.

F. Responsibilities/Applicability

Employees

Every employee is required to give his/her full cooperation to the Department of Labor and Employee Relations as it carries out its responsibilities under this Procedure. Employees shall not impede or interfere with an investigation by the Department of Labor and Employee Relations. Examples of prohibited conduct include, but are not limited to, reprisals against or interference with a complainant's right to file a complaint or any person's participation as a witness in an investigation.

Employees should report when they have either witnessed or been subjected to a violation of MARTA's Standards of Conduct Procedure, Workplace Violence Policy, bullying, or intimidation. Examples of types of complaints that fall under this procedure include but are not limited to violations of MARTA policies and/or procedures, verbal abuse, threats, and acts of mistreatment.

All parties are expected to hold issues, interviews, and other investigatory matters in full confidence.

Managers and Supervisors

All managers and supervisors have a duty to take appropriate action to promote a positive workplace. Managers and supervisors, especially through their own conduct, should create an environment where employees have mutual respect for each other.

Managers and supervisors are required to respond promptly to all complaints in accordance with the guidance set out below. Managers and supervisors are expected to release requests for information within ten (10) days.

II. Process

A. Employee's Right to File a Complaint

Employees are encouraged to initially bring complaints to their immediate manager or supervisor, when possible. If the matter cannot be resolved at the management level, or the complaint is being brought against their immediate supervisor or manager, then the employee may contact Employee Relations to seek appropriate intervention, including consultation, negotiation, mediation, and investigation.

Each department must provide an employee who feels that he/she has been mistreated sufficient time off from work to file a formal complaint with the Department of Labor and

 PROCEDURE	ISSUE DATE 02-16-2022 Revision No: 05	REFERENCE NO. HR-PPO-4290	Page 5 of 6
TYPE: CONDITIONS OF EMPLOYMENT: Resolution of Employee Complaints			

Employee Relations. All MARTA employees have the right to meet privately with Employee Relations staff during office hours to discuss issues or concerns.

Employees must first obtain approval from their manager/supervisor before leaving their worksite but are not required to disclose the reason for their meeting with Employee Relations staff.

Managers and supervisors are reminded that an employee's right to file a complaint is guaranteed and must be exercised freely without retaliation, penalty, or any resulting adverse difference in treatment.

B. Time Period for Filing a Complaint

All complaints must be filed within 180 days of the alleged occurrence. If activity is believed to be continuous, employees have 180 days from the date of the most recent occurrence to file a complaint.

III. **Summary of Investigation Process**

Generally, the complainant is required to do the following before a complaint is accepted by the Department of Labor and Employee Relations: 1) submit a written statement to the Department of Labor and Employee Relations containing detailed information about the perceived violative conduct (such request should include the complainant's full name, job title, supervisor's full name, contact information for the complainant's supervisor, the complainant's work shift times, work location and the complainant's full mailing address); and 2) meet with Labor and Employee Relations staff for an intake interview about the complaint.

Anonymous complaints are investigated by the Department of Labor and Employee Relations when the complaint provides sufficient information for a prompt and fair investigation. Employees may utilize the Employee Relations Hotline any time of day at 1-404-848-HELP (4357).

If the Employee Relations investigator, in consultation with the Manager of Employee Relations, concludes that a complaint set forth allegations which may constitute a violation of MARTA Standards of Conduct Procedure or Workplace Violence Policy, it will be accepted for investigation.

Employees who deliberately make false or malicious complaints may be subject to disciplinary action.

The complainant, respondent, and department head or designee will be advised of the acceptance of the complaint in writing.

The Employee Relations investigator will conduct a prompt and thorough investigation of the complaint. The investigation will include interviewing relevant parties, compiling and analyzing data and documents, preparing a written investigatory report on the findings from the investigation and making recommendations.

IV. **Complaint Determination**

A. Determination by the Department of Labor and Employee Relations

 PROCEDURE	ISSUE DATE 02-16-2022 Revision No: 05	REFERENCE NO. HR-PPO-4290	Page 6 of 6
TYPE: CONDITIONS OF EMPLOYMENT: Resolution of Employee Complaints			

All complaint determinations will be issued to the complainant and respondent in writing. The Department of Labor and Relations will make every reasonable effort to issue the determination within 90 business days after the acceptance of the complaint.

The determination issued by the Department of Labor and Employee Relations shall be final and is not subject to further review within MARTA.

B. Types of Complaint Determinations

1. Reasonable Cause – Based on the investigation, there is sufficient evidence to reasonably believe that MARTA's Standards of Conduct Procedure and/or Workplace Violence Policy has been violated.

If in connection with a reasonable cause determination, a recommendation is made for the discipline of an employee, that employee shall be afforded all rights applicable to his/her position.

2. No Reasonable Cause – Based on the investigation, there is insufficient evidence to reasonably believe that MARTA's Standards of Conduct Procedure and/or Workplace Violence Policy has been violated. If, after investigation, a "no reasonable cause" determination is issued to the parties, the case will be closed.
3. Settlement – An agreement has been reached that settles the complaint. The Department of Labor and Employee Relations will not issue a determination on the merits of the complaint.
4. Withdrawn – The complainant has made a written request to voluntarily withdraw his or her complaint.
5. Administrative Closure – The Department of Labor and Employee Relations has closed the case without reaching a determination about the allegations of the complaint.
6. Closed – The case was closed for a reason deemed appropriate by the Department of Labor and Employee Relations.

V. **Confidentiality**

The investigation shall be conducted in a confidential manner as deemed appropriate by the Department of Labor and Employee Relations under the circumstances of each complaint.



METROPOLITAN ATLANTA RAPID TRANSIT AUTHORITY

CONDITIONS OF EMPLOYMENT

REDUCTION IN FORCE

**PREPARED BY: HUMAN RESOURCES
MANAGER: LASHANDA R. DAWKINS
DATE: JULY 2021**



METROPOLITAN ATLANTA RAPID TRANSIT AUTHORITY

 PROCEDURE	ISSUE DATE 7/30/2021 Rev 07	REFERENCE NO. HR-PPO-4330	Page 2 of 7
TYPE: Conditions of Employment - Reduction in Force			

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marta  **PROCEDURE**

ISSUE DATE
7/30/2021
Rev 07

REFERENCE NO.
HR-PPO-4330

Page 3 of 7

TYPE: Conditions of Employment - Reduction in Force

ACKNOWLEDGEMENT OF REVIEW

REVIEWER	SIGNATURE	DATE
ELIZABETH M. O'NEILL CHIEF LEGAL COUNSEL	DocuSigned by: <i>Elizabeth M. O'Neill</i> 6D49C2012083429...	8/9/2021

 PROCEDURE	ISSUE DATE 7/30/2021 Rev 07	REFERENCE NO. HR-PPO-4330	Page 4 of 7
TYPE: Conditions of Employment - Reduction in Force			
ISSUING DEPARTMENT: Human Resources			
PREPARED BY: Human Resources			
APPROVED BY: LaShanda R. Dawkins <i>Assistant General Manager of Human Resources</i>		DocuSigned by:  2021 <small>87E39EC22EE7499...</small> Signature _____ Date _____	
Luz Borrero <i>Chief Administrative Officer (CAO)</i>		DocuSigned by:  8/16/2021 <small>22935AEC2B57433...</small> Signature _____ Date _____	
SUPERSEDES: IV.U Conditions of Employment – Reduction in Force			

I. General

A. Scope

The General Manager may authorize a reduction in the work force, which is accomplished by the separation of personnel to address: (1) adverse financial conditions, (2) technological or organizational changes, or (3) changes in the legal and regulatory environment in which the Authority must operate. The Board will be advised in advance of any reduction in force that involves more than 25 employees.

MARTA will attempt to avoid reductions in force and, whenever possible, will consider alternatives to reductions in force before any final decisions are made. In the event that a reduction in force is expected, MARTA will attempt to communicate information as soon as possible. However, management reserves the right to alter the reduction in force procedure and withhold information as permitted by law in order to protect the Authority's business interests.

Whenever it becomes necessary to reduce the number of positions, MARTA will consider the job function and the nature of the work that is needed to serve the Authority's mission. The guidelines in this procedure will be followed to identify personnel for separation.

The General Manager will designate senior management positions (director level and above) to be affected by a reorganization or reduction in force. All other non-represented Authority employees other than temporary and contract are subject to the provisions of this reduction in force procedure.

MARTA may amend this procedure or terminate it at any time, prospectively or retroactively, for any reason without notice.

B. Purpose

This procedure provides guidelines for a reduction in the Authority's non-represented workforce.

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TYPE: Conditions of Employment - Reduction in Force			

C. Review

The contents of this document will be reviewed on **07/30/2023** and **06/30** of each odd number year and thereafter. The **Director of Human Resources** will review this document with recommendations for revisions forwarded to the **Assistant General Manager of Human Resources** by **08/01**.

D. Definition

Term	Definition
Non-Represented Regular Employees	A regular employee is a full-time or part-time employee that is not in a temporary or contracted status and is regularly scheduled to work a full-time or less than full-time schedule each week.

E. Applicability

This policy applies to all employees: full-time, part-time, contract, temporary, represented and non-represented including all levels of management.

II. Process

A. Reduction in Force - Represented Positions

Reductions in force, general or targeted, that affect represented positions will be conducted in accordance with applicable labor agreement provisions.

B. Reduction in Force - Non-Represented Positions

Prior to the implementation of a non-represented reduction in force involving multiple position within one department or throughout the Authority, the General Manager will review those area that are to be affected by the reduction in force. The foregoing process does not apply to the elimination of a single position within a department.

Specific guidance for reduction plans, in accordance with the designations of the General Manager, will be issued to all Senior Staff. In the event of a reduction in force resulting from the elimination of non-represented positions where there are multiple incumbents in a particular job title, the following factors will be taken into consideration, as appropriate, to determine which employee(s) will be affected: performance as measured through the annual performance evaluation system, length of service with the Authority, length of service in the position, length of service in the affected office, attendance, safety record (where applicable), job experience prior to employment at the Authority, and commendations for exceptional performance.

In cases where job positions being eliminated are common to multiple business units but are being eliminated only in specific business units only incumbents of that position within an Office will be reviewed to determine those employees to be separated.

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C. Recall - Represented Positions

Recall of represented employees separated due to a reduction in force will be in accordance with the applicable labor agreement provisions.

D. Recall - Non-Represented Positions

An employee identified to be separated will be given an opportunity to apply for other positions within the business unit if the employee has the necessary qualifications for such position. For one year from the date of separation, a regular non-represented

employee, separated as a result of an Authority-wide reduction in force, has a right to be recalled to an Authority vacancy posted in the same job classification held by the employee at the time of separation if no changes have been made to the job function or description. If more than one employee is eligible for recall to a particular job position, the criteria previously used for determining those employees that were separated will be used to determine those employees to be recalled first. The service date for those employees re-employed within one year will be readjusted in accordance with the Authority's compensation policy. Re-employed employees will be required to serve a new, original probationary period if they are re-employed in a different job classification.

The Authority will establish a portal on the internet available to employees affected by the Reduction in Force listing those positions for which separated employees may qualify. If vacancies in the position the employee occupied at the time of the reduction in force become available, notice of recall will be sent by registered mail, return receipt requested, to the current home address on record with the MARTA records branch.

Unless an employee responds to the recall notice within seven calendar days following delivery, or attempted delivery, of the notice, the employee's name will be removed from the recall list and the employee will no longer retain any job recall rights with the Authority.

III. Responsibilities

1. General Manager

- Authorizes the reduction in force and approves final plan for implementation.

2. Department AGM and Office Director

- Prepares staff summary sheet identifying employees within an office who hold job classifications subject to a RIF.
- Provide performance documentation as requested by Human Resources for all employees in the same job classification for positions to be eliminated.

3. Human Resources

- Develops timeline and plans for notifying affected employees;
- Provides affected Department or Office with training and administrative assistance in implementing the RIF and separations for their employees.

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- Tracks and administers guidelines for RIF separated employees' recall/rehire; Establishes internet portal with vacancy listing; Notifies eligible former employees of recall opportunities.

IV. Separation Benefits

To be entitled to any of the separation benefits detailed in this procedure, other than wholly self-paid COBRA rights, an employee affected by a reduction in force must sign a release of claims against MARTA after his/her last day of work. MARTA will prepare this agreement. The employee affected by a reduction in force must sign this agreement and file it with MARTA by the deadline noted in the release. If the employee changes his/her mind, he/she may revoke the agreement within eight (8) days of filing it with the company. The separation benefits will be paid to the affected employee, in a lump sum less required withholding tax and health benefit contributions, approximately nine (9) days after filing the release, unless he/she has revoked it.

Non-represented regular employees separated due to a reduction in force shall receive a separation package comprised of the separation benefits outlined below. When deemed in the best interest of the Authority, the General Manager is authorized to grant alternative separation benefits when, in his or her judgment, payment of such benefits is warranted.

Every non-represented employee (excluding director and above), who has worked for the Authority for more than one (1) year, will receive a base separation benefit of 4 weeks' pay plus one week pay per additional year of continuous employment up to a maximum of 13 weeks' pay. The General Manager may authorize alternative separation benefits to individual employee(s), if such action is determined to be in the best interest of the Authority.

All non-represented employees occupying Director level positions and above, who have a minimum of one (1) year service with the Authority, will receive a base separation benefit of 6 weeks' pay plus two weeks' pay per additional year of continuous employment up to a maximum of 24 weeks' pay. The General Manager may authorize alternative separation benefits to individual employee(s) if such action is determined to be in the best interest of the Authority.

No separation package will be offered to employees with less than one year of continuous employment with the Authority; however, the General Manager may authorize, if it is determined to be in the best interest of the Authority, separation benefits to individual employee(s) with less than one year of continuous employment.

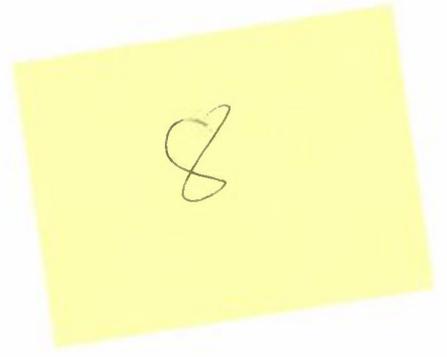
If an employee is notified of the elimination of their position prior to the actual date of separation of employment, to be eligible for the severance benefit as outline above, the employee must continue to satisfactorily perform their job duties and maintain MARTA property and information in their possession in accessible condition.

EXHIBIT 8

Training and Development

C

Direct
Indirect



O

TRAINING THAT FOSTERS PROMOTION

C

**MARTA Internal Training Courses
Fostering Promotional Opportunity**

1	9560/PC Timeclock
2	AC Traction Motor Rebuild
3	ATC Logic and Control
4	ATC Orientation and Safety
5	ATC Relay Test Certification
6	ATC Wayside Equipment
7	ATC/Automatic Train Operation
8	ATDAS
9	ATO/ATS (Cabmatic #1) T/S
10	Administrative Assistant
11	Air Brakes Theory and Operation
12	Air Compressor & Brake System Maintenance (Mechanics)
13	Air and Brake Training for Inspector Candidate
14	Allison B400 Transmission Diagnostics
15	Automatic Train Control System (Technicians)
16	Auxiliary Power System Operations
17	BUS Coolant Sys Pressure Test (JUST)
18	BUS Ford IDS Log in (JUST)
19	BUS OPERATIONS SUPERVISORS TRAINING
20	BUS SR1736 ABS
21	BUS Steering and Suspension (2 yr. POI)
22	Base Radio--HRTF-6014
23	Basic PLC
24	Brake System Troubleshooting (Mechanics MST)
25	Braking Systems
26	Bus Air Brake Systems (2 yr POI)
27	Bus Air Brake Systems (6 months POI)
28	Bus Basic Mechanics / Shop Safety (2 yr POI)
29	Bus Battery Maintenance Procedures
30	Bus Body
31	Bus Destination Signs
32	Bus EMP System (Vendor)
33	Bus Electrical Systems (2 yr POI)
34	Bus Electrical Systems (6 month POI)
35	Bus Engine Dynamometer (TEST)
36	Bus Engine Systems
37	Bus Engine Systems (6 month POI)
38	Bus HVAC (6 months POI)
39	Bus HVAC Diagnostics
40	Bus HVAC EPA 608 Certification
41	Bus HVAC TK IntelligAIRE III
42	Bus Kranking Kart
43	Bus Lift Safety
44	Bus MAN Warranty Training
45	Bus Maintenance Articulated Bus Familiarization
46	Bus New Air/Brake System Differences
47	Bus Power Brake Overhaul
48	Bus Preventative Maintenance (6 months POI)
49	Bus Preventative Maintenance (A Inspection)
50	Bus Radius Rod Bushing

**MARTA Internal Training Courses
Fostering Promotional Opportunity**

51	Bus Ramp Preventative Maintenance
52	Bus Ramp System (6 month POI)
53	Bus Ramps & Signs (2yr POI)
54	Bus SR1736 Disc Brakes
55	Bus SR1736 Doors and Ramp
56	Bus SR1736 Gen 2 Air System
57	Bus SR1736 Vansco
58	Bus Safety and Orientation (6 months POI)
59	Bus Service Procedures
60	Bus Supervisor Certification
61	Bus TouchMate Training
62	Bus Transmission Specialist (TEST)
63	Bus Transmission Systems (6 mo. POI)
64	Bus Wheel Polisher Training
65	Bus e-Stroke
66	CCTV Maintenance
67	CDL Class with Endorsement Testing
68	CDL Training
69	CPR Instructors Course
70	CQ310 APSE Refresher Training - Technicians
71	CQ310 Rehab HVAC (Mechanics)
72	CQ310, CQ311 & CQ312 Auxiliary Power Supply System (Technicians)
73	CQ310/CQ311 Rehab Auxiliary Power Supply (Technicians)
74	CQ310/CQ311 Rehab Brakes (Mechanics)
75	CQ310/CQ311 Rehab Cab Signal & ATC (Technicians)
76	CQ310/CQ311 Rehab Diagnostics and FIMS (Technicians)
77	CQ310/CQ311 Rehab HVAC (Technicians)
78	CQ310/CQ311 Rehab Passenger Door (Technicians)
79	CQ310/CQ311 Rehab Trucks & Suspension (Mechanics)
80	CQ312 Door Troubleshooting
81	CQ312 Side Door System Refresher Training (Mechanics)
82	Cab Control Logic Unit Refresher Skills Training
83	Cabmatic Equipment (Technicians)
84	Cabmatic Train Operation
85	Change Management
86	Chief of Strategic Training
87	Coaching and Counseling Employees for Supervisors
88	Coaching for Supervisors (Change and Motivation)
89	Coaching for Supervisors (Conflict)
90	Coaching for Supervisors (Delegation and Star Model)
91	Coaching for Supervisors (Problem Solving)
92	Code of Ethics
93	Cooling System Filling and De-aeration Procedures by New Flyer
94	Cummins C8.3 CNG
95	Cummins C8.3 Diesel
96	Cummins C8.3 ISL Fuel System
97	Cummins ISL-G Training by Tactical Training Strategies
98	Customer Service Impact
99	Customer Service Impact - Professional Bus Operators
100	Data Communication Interfaces
101	Defensive Driving Maintenance

**MARTA Internal Training Courses
Fostering Promotional Opportunity**

102	Defensive Driving for Inspector Candidates
103	Director of Bus Transportation
104	Director of Real Estate
105	Door Control (Technicians)
106	Effective Communication for Managers
107	Effective Communication for Station Agents
108	Effective Communication for Supervisors
109	Effective Communication for Supervisors and Managers
110	Electro-pneumatic Couplers and Semi-permanent Draw Bars
111	FMLA Manager
112	FTA Post Accident Decision
113	Fiber Certification
114	Fire Systems--HRTF-6021
115	Forklift Training for Inspector Candidates
116	Fueling and Servicing Training for Inspector Candidate
117	Globally Harmonized System
118	Group Dynamics
119	HP 8000 series Printer
120	HVAC (Technicians)
121	HVAC EPA 608 Certification
122	HVAC Systems Diagnostics
123	HVAC Systems Operation
124	Incident Report Writing
125	Internal Customer Service
126	Introduction to Air Conditioning
127	Introduction to Refrigeration and Air Conditioning (Mechanics)
128	Introduction to Wireless Networking
129	John Deere Engines
130	Ladder Safety - Fall Protection
131	Layman Traction & Auxiliary/Facility Power System Overview
132	Level 1 Wayside Access Certification
133	Level 1-2 Wayside Access Recertification
134	Level 2 Wayside Dedicated Lookout Certification
135	Level 3 Wayside Flagperson Certification
136	Level 3 Wayside Flagperson Field Evaluation
137	Level 3 Wayside Flagperson Recertification
138	Locomotive Certification
139	Lost and Found Coordinator
140	M.A.N. Axle Service and Repair
141	Managerial Roles & Responsibilities
142	Managing Conflict
143	Managing Conflict for Supervisors
144	Material Controller
145	Meridian Switch
146	Mobile Radio--HRTF-6012
147	Mobility Battery (Rush Truck)
148	Mobility Brakes (Rush Truck)
149	Mobility Bus Electrical Systems
150	Mobility Bus HVAC Systems
151	Mobility Intermotive System
152	Mobility International Orientation

**MARTA Internal Training Courses
Fostering Promotional Opportunity**

153	Mobility Ricon Lift Orientation
154	Mobility Scheduler I
155	Mobility Service Agent
156	Mobility ThermoKing Orientation
157	Networks & Multiplexing
158	OTE Re-certification
159	On-Track - Equipment (OTE)
160	On-Track Equipment (OTE) Field Evaluation
161	On-Track Equipment (OTE) Recertification
162	On-Track Equipment Operator Certification
163	Onboarding for Managers
164	Operations--HRTF-6015
165	Oxyacetylene Torch Use, Soldering Procedures, Safety & Operation
166	PA Equipment
167	PBO RTW (Return to Work)
168	PBO Recertification
169	PBO Retraining 2 hrs Bus
170	PBO Smith System Defensive Driving Certification (8 hours)
171	Portable Radio--HRTF-6013
172	Preventive Maintenance Inspection Procedures
173	Professional Bus Operator Candidate Certification
174	Quester Tangent FIMS Training
175	Rail Car AC Traction and Controls (Technicians)
176	Rail Car Air Comfort/ HVAC (Mechanics)
177	Rail Car Apprentice Electronics Tech Program Review & Final Exam
178	Rail Car Apprentice Mechanic Program Review & Final Exam
179	Rail Car Cab Controls and FIMS (Technicians)
180	Rail Car Cleaner Certification
181	Rail Car Motor Maintenance (Mechanics)
182	Rail Car Side Door Maintenance (Mechanics)
183	Rail Car Truck Assemblies Maintenance (Mechanics)
184	Rail Fire Department Training (Simulations)
185	Rail Line Supervisor TCSU Mini Fleet/FIMS Training
186	Rail Locomotive Certification
187	Rail Locomotive Recertification
188	Rail Operations Recertification HRTT 3005-3105-3205-4005
189	Rail Operator - Supervisor Certification
190	Rail Operator Certification
191	Rail Operator Recertification
192	Rail Operator Refresher
193	Rail Operator Retraining
194	Rail Service Communications Console Certification
195	Rail Service Communications Console Recertification
196	Rail Service Control Center Certification
197	Rail Service Control Center Recertification
198	Rail Service Control Center Refresher Training
199	Rail Service Control Center Retraining
200	Rail Service Network Computers
201	Rail Service Supervisor Certification
202	Rail Service Supervisor Refresher
203	Rail Service Supervisor Retraining

**MARTA Internal Training Courses
Fostering Promotional Opportunity**

204	Rail Yard Supervisor Certification
205	Rail Yard Supervisor Refresher
206	Rail Yard Supervisor Retraining
207	Reasonable Suspicion Training for Supervisors
208	Remote Terminal Units
209	Robinair 17800B
210	Safety Applications
211	Safety First for Supervisors
212	Safety and Orientation Training for Inspector Candidate
213	Safety in Communication Crafts
214	Sexual Harassment Refresher for Supervisors
215	Shop On The Job Training RCM
216	Shop Safety & Equipment Operation
217	System Security Awareness
218	TCP/IP
219	TDS1000/TDS2000 -SCOPE
220	Telephone SONET/DACS--HRTF-6042
221	Telephone T-1/PCM--HRTF-6041
222	Telework Informational Sessions
223	Terminal Servers
224	Traction Power Systems Operations
225	Train Radio--HRTF-6011
226	Train the Trainer for Instructors
227	Trainline Interface
228	Transit Vehicle Overview (Technicians)
229	Transitioning To Supervision
230	Troubleshooting Friction Brake (Technicians)
231	Tunnel Fan Operations
232	Undercar Cleaning Process (Service Persons)
233	Wayside Access Level I Re-certification
234	Wayside Access Level II Re-certification
235	Wayside Access Level III Re-certification
236	Wayside Access--Level I Certification
237	Wayside Access--Level III Certification
238	Wayside Access--Level IV Certification
239	Wayside Access--Level IV Field Certification
240	Wayside Access--Level IV Re-certification
241	Wheel Truing



**LATINOS
IN TRANSIT**

LEADERSHIP DEVELOPMENT ACADEMY

ACCEPTING APPLICATIONS

MARTA offers a new professional development opportunity for Latino and minority professionals to participate in the **Latinos In Transit Leading in Middle Management Program**.

**CLICK HERE TO
LEARN MORE**

Promoting the advancement and development of Latinos & other minorities in transportation.

**DEADLINE TO
APPLY IS FRIDAY,
JANUARY 28TH**

Learning & Development
Learn. Grow. Excel.

EXHIBIT 9

Outreach Initiatives

EEO Partnership Directory: Outreach Efforts

Organization
Atlanta Area Council American Business Women's Association
Atlanta Independent Women's Network
Atlanta Women's Network
BWEP- Business Women Empowerment Project, Inc
Georgia Federation of Business & Professional Women's Clubs, Inc.
Greater Women's Business Council
Red Door Consulting
National Association of Professional Women - Atlanta Chapter
National Association of Women Business Owners - Atlanta
National Organization for Women - Georgia Chapter
Service Women's Action Network - Atlanta
Society of Women Engineers - Atlanta
The Links, Incorporated - Atlanta Chapter
WICERS: Women in Construction, Engineering and Related Services
Women in Technology (WIT)
Women in Transit Seminar (WTS)
Alliance for Women's Equality
American Association of University Women
American Society of Women's Accountants
Association for Women in Science
Business and Professional Women/USA
Catalyst
Center for American Women and Politics GH Award for Women in Government (Eagleton Institute of Politics)
Center for Health and Gender Equity
Center for Women Policy Studies
Hispanic Women's Corporation
Institute for Women's Policy Research
Mexican American Women's National Association (MANA)
Minnesota Women's Press, Inc.
Ms. Foundation for Women
National Council for Research on Women
National Council of Women's Organizations
National Hispana Leadership Institute
National Women's History Project
The Women's Committee of 100
The Women's Research and Education Institute
Women in Military Service for America Memorial, Inc.
Women in Science and Engineering (WISE)
Women Work! The National Network for Women Employment
Women's Bureau - US Department of Labor
Women's Policy, Inc.
Association of Latino Professionals For America (ALPFA)
Georgia Association of Latino Elected Officials (GALEO)
Georgia Hispanic Chamber
Georgia Hispanic Construction Association (GHCA)
Georgia Tech Society of Hispanic Professional Engineers
Hispanic Alliance for Career Advancement
Hispanic Corporate Council of Atlanta
HispanicPro
International Brotherhood of Electrical Workers - Local Union 613 (IBEW)

EEO Partnership Directory: Outreach Efforts

Latin American Chamber of Commerce of Georgia
League of United Latin American Citizen (LULAC)
Mundo Hispanico
National Association of Hispanic-American Real Estate Professionals (NAHREP Atlanta)
National Black & Latino Council
Prospanica (formerly National Society of Hispanic MBAs)
Society of Hispanic Professional Engineers - Atlanta Professional Chapter (SHPE Atlanta)
Korean American Association of Greater Atlanta
Korean American Bar Association of Georgia
Korean-American Coalition - Atlanta
Maharashtra Mandal of Atlanta
Malaysian Association of Georgia
National Association of Asian American Professionals - NAAAP Atlanta Chapter
National Association of Chinese Americans
Nepalese Association in Southeast America
Network of Indian Professionals (NIP) Atlanta
Organization of Chinese Americans-Georgia
Pujari Atlanta
Rajasthan Association of Georgia
Raksha, Inc.
Sindhi Sabha of Georgia
South Asian Bar Association of Georgia
Telugu Association of Metro Atlanta
United States Hindu Alliance
American-Arab Anti-Discrimination Committee
Arab American Institute
Asian American Government Executives Network
Asian American Institute
Asian American Justice Center
Asian American Legal Defense & Education Fund
Asian Pacific American Heritage Council
Asian Pacific American Institute for Congressional Studies
Asian Pacific American Network
Asian Pacific Islander American Health Forum
Asian Pacific Policy and Planning Council
Asian Women in Business
Association of Asian Pacific Community Health Organizations
Center for Asian American Media
Committee of 100
Federal Asian Pacific American Council
Golden Spike National Historic Site
Japanese American Citizens League
American Legion - Buckhead
Another Chance of Atlanta, Inc.
Atlanta Veterans Association
Atlanta Vietnam Veterans Association
Disabled American Veterans (DAV)
Gary Sinise Foundation
Georgia Department of Veterans Services

EEO Partnership Directory: Outreach Efforts

Georgia Veterans Education Career Transition Resource (VECTR) Center
HOPE Atlanta
Manager, Center for Career Planning & Workforce Strategies
Middle Tennessee State University
New Horizons Computer Learning Center
North Georgia Veterans
Operation Homefront
Operation Workforce (Georgia Department of Economic Development, Workforce Division)
Team RWB Atlanta
The Safe American Foundation
The Women's Consortium of Georgia
Trident University
U.S. Department of Veteran Affairs
Veterans Administration Regional Office
Veterans Empowerment Organization
Veterans Empowerment Organization
College and University
Agnes Scott College
American Intercontinental University
Art Institute of Atlanta
Ashworth University
Allanta Metropolitan State College
Allanta Technical College
Bauder College
Brenau University (Gainesville)
Chamberlain College of Nursing
Chattahoochee Technical College (Marietta)
Clark Atlanta University
Clayton State University
Clayton State University (Morrow)
Columbia Theological Seminary (Decatur)
DeVry University
Emory University
Emory University
Georgia Gwinnett College (Lawrenceville)
Georgia Institute of Technology
Georgia Perimeter College (Decatur)
Georgia State University
Gwinnett College - Sandy Springs (Sandy Springs)
Gwinnett Technical College (Lawrenceville)
Herzing College
Interdenominational Theological Center
John Marshall Law School
Kennesaw State University
Kennesaw State University (Marietta Campus)
Laurus Technical Institute (Decatur and Jonesboro)
Life University (Marietta)
Mercer University (Cecil B. Day Graduate and Professional Campus)
Metropolitan Atlanta State College (Atlanta, GA.)
Morehouse College

EEO Partnership Directory: Outreach Efforts

Morehouse School of Medicine
Morris Brown College
Oglethorpe University (Brookhaven)
Point University (West Point)
Savannah College of Art and Design - Atlanta Campus
Southern Polytechnic State University (Marietta)
Spelman College
University of West Georgia (Carrollton)

EXHIBIT 10

Subrecipients and Contractors List

List of Subrecipients

Dekalb County, GA

Cobb County, GA

Sandy Springs, GA

List of Contractors on Federally Funded Procurements

R.L. Banks & Associates, Inc.	–	Advisory Service for Commuter Rail Coordination
Advantage Graphics & Signs	--	Refurbishment of Area Signs
Woolpert, Inc.	--	Topography Surveying Services
KCI Technologies, Inc.	--	Overhead Subsurface Utility Engineering
Railworks Track System, Inc.	--	Track Renovation Phase IV
Cleveland Electric Company	--	Emergency Trip Station Replacement
Dell Marketing, L.P.	--	Microsoft 365 Licenses
IA Advanced Telecom Solutions	--	Online Security Training
Center for Transportation & Environ	--	Consulting Services for Zero Emission Buses
New Flyer of America	--	Bus Purchases
Autaco Development, LLC	--	Bus Stop Amenities
Kimley-Horn & Associates, Inc.	--	Design Services for Summerhill BRT
Vanasse Hangen Brustlin, Inc. (VHB)	--	Beltline LRT Feasibility Study
C3M Power Systems, LLC	--	Emergency On-call Repairs for Light Rail
Edgewood TOD III, LLC	--	Reimbursement for Edgewood-Candler TOD
Galls, LLC	--	Police Ballistic Vests & Carriers
Clyde Armory, Inc.	--	Police Tactical Rifles
Remotec, Inc.	--	Andros Spartan Robot Upgrade
Cardinal Infrastructure, LLC	--	Federal Advisory Services
Gresham Smith	--	Right of Way Consulting Services

Skidmore, Owings & Merrill, LLC	--	Five Points Station Transformation
IDOM, Inc.	--	Design Concept Services for Atlanta Beltline
The Aftermarket Parts Co., LLC	--	Bus Midlife Overhaul Parts Kits
HNTB, Corp	--	System Engineering Services
WSP USA, Inc.	--	System Engineering Services

EXHIBIT 11

**Subrecipients and Contractors
EEO Monitoring**

**NEW FREEDOM
Subgrant Recipient
Site Visit Checklist**

Name of Grantee: **Dekalb County**

Location of Site Visit: *MARTA at Lou Walker Senior Center*

Date of Site Visit : **July 24 2019**

Grantee Representatives in Attendance Sign in Sheet attached separately
MARTA Representatives in Attendance

Documents and Policies on File at MARTA Grant Programs and Grantee Office

Highlighted Policies and Procedures were presented as hard copy documentation at the beginning of the meeting. We will review and concur by e-mail within 30 days of this report.

Name of Document/Policy	Does MARTA Grant Programs Have a Copy?	Date of Copy on File	Is the Copy on File the Most Recent?
Administrative Documents			
1. ADA Policies	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2. Bus Schedules if Applicable	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No
3. Certification of Equivalent Service	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No
4. Code of Ethics	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
5. Contracts or Subcontracts for Service	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
6. Customer Complaint/Comment Process	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
7. Disadvantaged Business Enterprise Plan	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No
8. Drug and Alcohol Policy	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
9. Equal Opportunity Employment Policy	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
10. Job Description for Grant Funded Positions	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
11. Policy Prohibiting Harassment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
12. Purchasing Policy	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
13. Regional Transportation Plan	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No
14. Single Audit Report	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
15. Title VI Plan	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
16. Unfair Competition Complaint Process	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No
Capital Documents			
17. Asset Management Plan	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No
18. Vehicle Maintenance Plan	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No
Financial Documents			

19. Indirect Cost Allocation Plan or Rate	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A		<input type="checkbox"/> Yes	<input type="checkbox"/> No
20. In-Kind Valuation Plan	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A		<input type="checkbox"/> Yes	<input type="checkbox"/> No
21. Volunteer Drive Policy	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A		<input type="checkbox"/> Yes	<input type="checkbox"/> No
Topic						
1) Civil Rights						
What effort does your organization make to reach out to minorities for employment and to serve as members of your policy and/or advisory committees? The program coordinator, mobility manager and directors do outreach services on a weekly basis.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
How do you ensure that the services provided by your organization are accessible to all people regardless of race, color, religion, sex, national origin or disability? Handouts and bulletin boards.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Does your organization have a written policy in place to prevent harassment, intimidation and coercion in any form? Bulletin Board.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
a. Has the policy been updated since the date shown on the front of this checklist? (if no, skip to b.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
b. Does the policy cover all forms of harassment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Has your organization received any written complaints alleging discrimination in its employment practices or services provided within the last twelve months? (if no, skip a and b)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
a. Describe the complaint:						
b. What is the status of the complaint?						
Follow-up Action:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
2) Title VI See Plan in the Manual Provided						
Does your organization have a written Title VI policy?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
a. Has the policy been updated since the date shown on the front of this checklist? (if no, skip b.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
b. Does the plan cover the following elements?						
Maintaining a list of any active investigations, lawsuits or complaints name the grantee or MARTA?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Reasonable steps to ensure meaningful access for persons with limited English proficiency (LEP)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
c. Does your organization have a Title VI/EEO coordinator	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
d. Is there a specific non-English speaking population in your service area that exceeds either 1,000 people or 5% of the population (whichever is less)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
e. Are vital documents translated into that language?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
f. Describes how your organization notifies the public of their rights under Title VI See manual provided.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>

Follow Up Action (Required, Recommended, and other comments) https://www.dekalbcountyga.gov/title-vi/title-vi	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
3) Americans with Disabilities Act (ADA)	
What types of services are provided with the operating funds or the equipment purchased under the grant(s)	<input type="checkbox"/> Fixed Route <input checked="" type="checkbox"/> Demand Response
Are ADA accessible vehicles used for all grant funded services? (if yes skip the next two questions)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
How do you ensure that equivalent services are provided to persons with disabilities?	
Have you filed a certificate of equivalent service?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Has the certificate been updated since the date shown on the front of this checklist?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Do you have the following ADA related policies? A process to address ADA related complaints? Would not directly apply to the voucher program.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Service Animals – are service animals allowed in vehicles and facilities?	
Are there any restrictions placed on service animals (i.e. type of disability, advanced notice, type of animals allowed, etc.)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
The procedure to determine eligibility for complementary paratransit service (fixed route services only)?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
The process used to handle ADA complaints? See manual provided	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Does your organization have an ADA compliance officer? See manual provided	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Do you provide training to employees and contractors regarding safety, respect, courtesy, and sensitivity in transporting persons with disabilities?	
Are lifts and securement systems used for persons with disabilities?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Can lifts be used by ambulatory persons (persons not using mobility devices)?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
How do you ensure that your employees and/or contractors comply with ADA service requirements?	
Have any facilities been modified? If yes, were the modifications in accordance with 49 CFR Part 37. "ADA Accessibility Guidelines?"	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Are all facilities ADA accessible?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Are your transportation services provided to persons who use portable oxygen or respirators?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Is information about your services made available to the public in accessible formats? Describe. Handouts - See manual provided.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Is there a written policy on service animals?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A

Are fares charged for Personal Care Attendants?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
How do you ensure there is no pattern or practice of trip denials? Untimely pick-ups? Missed trips? Excessively long trips?			
4) ADA (Fixed route services only)			
Do you provide complementary paratransit service extending ¼ mile outside the fixed route?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
What system do you use to track, monitor, and analyze service denials?			
Do drivers announce major stops, transfer stations, requested stops and destination points?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
Are routes clearly identified at multi-route stops?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
Can lifts be deployed at all stops?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
Are persons with disabilities allowed adequate time to board and disembark the vehicles?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
Are other accessibility features used (i.e. stop request buttons)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
Follow Up Action (Required, Recommended, and other comments)			
5) Disadvantaged Business Enterprise (DBE)			
Does your organization expect to award contracts with a combined total of or exceeding \$250,000 in FTA funds during the current fiscal year (excluding rolling stock)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
Does your organization have a Disadvantaged Business Enterprise (DBE) plan approved by FTA?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
What is your DBE goal?			
Do you submit DBE reports directly to FTA?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
Do the reports include FTA funding received through a grant with MARTA?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
Is your organization currently meeting its goal for purchasing from DBE sources?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
Did you or will you adopt the MARTA DBE plan?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
Do you update your agency's goal annually?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
Is your agency currently meeting your agency's goal?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
Does your organization have a DBE coordinator?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
Please describe your good faith effort to purchase from DBE vendors?			
Does your organization use the Supplier Diversity Office on-line resources?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A

Follow Up Action (Required, Recommended, and other comments)	
Employment Practices	
Do all employees working on the project receiving minimum wage or higher?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Are any employees working on the project subject to overtime under state or FTA law?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
Do they receive overtime at a rate of time and a half for hours worked in excess of 40 hours per week?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Does your organization have a job description for each position or group of positions?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Have the descriptions been updated since the date shown on the front of this list?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
Specify if the position is exempt or non-exempt from the Fair Labor Standards Act.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Clearly describe the physical requirements associated with the position.	See Job Descriptions provided in the manual.
Do the staff receive professional training on a regular basis? Describe.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Was your organization awarded \$1M or more in FTA funds for operating or capital activities of \$250,000 or more in planning funds in the last year?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
Specify if the position is subject to FTA drug and alcohol testing.	
Does your agency have 50 or more public transportation related employees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
Does your agency have an Equal Employment Opportunity Plan?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Has it been updated since the date shown on the front page of the checklist?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
Does your organization have a Drug and Alcohol Program Coordinator?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Does your organization have a System Safety and Security Officer?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Follow Up Action (Required, Recommended, and other comments)	
Code of Ethics	
Does your organization have a written Code of Ethics?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Does the Code of Ethics include all the required elements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Personal Conflict of Interest?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Organizational Conflict of Interest?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Identification and Prevention?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Does the Code of Ethics cover all employees, officers, board members and agents?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Follow Up Action (Required, Recommended, and other comments)	

6) FY 2019 Triennial Review	
Progress Reports Prepared Quarterly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Are requests for reimbursements submitted regularly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Are transit program vendors and employees paid in a timely manner?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Lobbying Certification in the Subagreement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Do we monitor pass through sub recipient capital projects?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Have any transit-related lawsuits/complaints been filed over the last three years? If yes, please give details including date, name of complainant, and summary of allegation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
Follow Up Action (Required, Recommended, and other comments)	

Next Steps –

1. MARTA will forward contact links for DHS and ARC. Sent via e-mail
2. MARTA will forward assessment reports from similar programs. Sent via e-mail
3. Briefly review DeKalb's last FTA 5310 application and give feedback We are reviewing and will respond in the next two weeks.
4. DeKalb will provide a lessons learned or assessment report in their September 2019 Financial and Milestone Report.

Cobb County Department of Transportation
Subgrant Recipient
Pre-Site and Site Visit Checklist

Location of Site Visit: Virtual on Teams Meetings Date of Site Visit June 24, 2021

Grantee Representatives in Attendance: Andrea Foard, Lorraine Vance, Mark Lambert

MARTA Representatives in Attendance: Yvonne DeBellotte, Eileen Schwartz-Washington, Michael Bradley,
Veronica Ulam

Documents and Policies on File at MARTA Grant Programs and Grantee Office: All documents requested were received prior to the date of this review.

Name of Document/Policy	Does MARTA Grant Programs Have a Copy?	Date of Copy on File	Is the Copy on File the Most Recent?
Administrative Documents			
1. ADA Policies	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2. Bus Schedules if Applicable	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
3. Certification of Equivalent Service	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No
4. Code of Ethics	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No
5. Contracts or Subcontracts for Service (s)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No
6. Customer Complaint /Comment Process	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No
7. Disadvantaged Business Enterprise Plan	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No
8. Drug and Alcohol Policy	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No
9. Equal Opportunity Employment Policy	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No
10. Job Description for Grant Funded Positions	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No
11. Hiring Policy and Advertisement for Grant Funded Positions	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No
12. Policy Prohibiting Harassment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No
13. Purchasing Policy	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No
14. Regional Transportation Plan	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No
15. Single Audit Report	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No
16. Title VI Plan	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No
17. Unfair Competition Complaint Process	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No
Capital Documents			
18. Asset Management Plan	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No
19. Vehicle Maintenance Plan	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No
20. Were any federally funded vehicles or assets disposed	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No

of since our last visit? (August, 2019)			
Financial Documents			
21. Indirect Cost Allocation Plan or Rate	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
22. In-Kind Valuation Plan	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
23. Volunteer Drive Policy	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
Topic			
1) Civil Rights			
What effort does your organization make to reach out to minorities for employment and to serve as members of your policy and/or advisory committees?	Information available in the Title VI Plan.		
How do you ensure that the services provided by your organization are accessible to all people regardless of race, color, religion, sex, national origin or disability?	Cobb Transportation uses all available social media, including media ads on their buses.		
Does your organization have a written policy in place to prevent harassment, intimidation and coercion in any form?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
a. Has the policy been updated since the date shown on the front of this checklist? (if no, skip to b.) 2021-2024	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
b. Does the policy cover all forms of harassment?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Has your organization received any written complaints alleging discrimination in its employment practices or services provided within the last twelve months? (if no, skip a and b)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A
a. Describe the complaint:			
b. What is the status of the complaint?			
Follow-up Action:	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
2) Title VI			
Does your organization have a written Title VI policy?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
a. Has the policy been updated since the date shown on the front of this checklist? (if no, skip b.)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A
b. Does the plan cover the following elements:			
Maintaining a list of any active investigations, lawsuits or complaints name the grantee or MARTA?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
Reasonable steps to ensure meaningful access for persons with limited English proficiency (LEP)?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
c. Does your organization have a Title VI/EEO coordinator	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
d. Is there a specific non-English speaking population in your service area that exceeds either 1,000 people or 5% of the population (whichever is less)	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
e. Are vital documents translated into that language?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A

f. Describe how your organization notifies the public of their rights under Title VI	
Follow Up Action (Required, Recommended, and other comments)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
3) Americans with Disabilities Act (ADA)	
What types of services are provided with the operating funds or the equipment purchased under the grant(s)	<input checked="" type="checkbox"/> Fixed Route <input checked="" type="checkbox"/> Demand Response
Are ADA accessible vehicles used for all grant funded services? (if yes skip the next two questions)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
How do you ensure that equivalent services are provided to persons with disabilities?	Paratransit Guide Brochures available. The paratransit service operates within the ¼ mile area surrounding the existing bus routes.
Have you filed a certificate of equivalent service?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Has the certificate been updated since the date shown on the front of this checklist?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Do you have the following ADA related policies: A process to address ADA related complaints?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Service Animals – are service animals allowed in vehicles and facilities?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Are there any restrictions placed on service animals (i.e. type of disability, advanced notice, type of animals allowed, etc.)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
The procedure to determine eligibility for complementary paratransit service (fixed route services only)?	Instructions located on Cobb Linc's Paratransit Section "How to Apply"
The process used to handle ADA complaints?	Instructions located on Cobb Linc's Paratransit Section "How to Apply" Standard transit requirements per FTA guidelines.
Does your organization have an ADA compliance officer?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Do you provide training to employees and contractors regarding safety, respect, courtesy, and sensitivity in transporting persons with disabilities?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Are lifts and securement systems used for persons with disabilities?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Can lifts be used by ambulatory persons (persons not using mobility devices)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
How do you ensure that your employees and/or contractors comply with ADA service requirements?	ADA Contractor, First Transit has weekly (4-hours on Tuesdays) etiquette training for its employees. The curriculum covers 60 modules on various topics including overviews of the ADA and the Americans with Disabilities Travel Training Program Staff have attended the training.
Are all facilities ADA accessible?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

Are your transportation services provided to persons who use portable oxygen or respirators?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Is information about your services made available to the public in accessible formats? Describe.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
4) ADA (Fixed route services only)			
Do you provide complementary paratransit service extending ¼ mile outside the fixed route?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
What system do you use to track, monitor, and analyze service denials?	Eligibility Assessment Criteria		
Do drivers announce major stops, transfer stations, requested stops and destination points?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Are routes clearly identified at multi-route stops?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Can lifts be deployed at all stops?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Are persons with disabilities allowed adequate time to board and disembark the vehicles?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Are other accessibility features used (i.e. stop request buttons)?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Follow Up Action (Required, Recommended, and other comments)			
5) Disadvantaged Business Enterprise (DBE)			
Does your organization expect to award contracts with a combined total of or exceeding \$250,000 in FTA funds during the current fiscal year (excluding rolling stock)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
Does your organization have a Disadvantaged Business Enterprise (DBE) plan approved by FTA?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
What is your DBE goal?	7%		
Do you submit DBE reports directly to FTA?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
Do the reports include FTA funding received through a grant with MARTA?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
Is your organization currently meeting its goal for purchasing from DBE sources?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
Did you or will you adopt the MARTA DBE plan?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
Do you update your agency's goal annually?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Is your agency currently meeting your agency's goal?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Does your organization have a DBE coordinator?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Please describe your good faith effort to purchase from DBE vendors?			
Does your organization use the Supplier Diversity Office on-line resources?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A

Follow Up Action (Required, Recommended, and other comments)	
Employment Practices	
Do all employees working on the project receiving minimum wage or higher?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Are any employees working on the project subject to overtime under state or FTA law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Do they receive overtime at a rate of time and a half for hours worked in excess of 40 hours per week?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Does your organization have a job description for each position or group of positions?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Have the descriptions been updated since the date shown on the front of this list?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Specify if the position is exempt or <u>non-exempt</u> from the Fair Labor Standards Act.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Clearly describe the physical requirements associated with the position.	Job Description Provided
Was your organization awarded \$1M or more in FTA funds for operating or capital activities of \$250,000 or more in planning funds in the last year?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Specify if the position is subject to FTA drug and alcohol testing.	Cobb County Transit Policies for Drug and Alcohol Testing.
Does your agency have 50 or more public transportation related employees?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Does your agency have an Equal Employment Opportunity Plan?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Has it been updated since the date shown on the front page of the checklist?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
Does your organization have a Drug and Alcohol Program Coordinator?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Does your organization have a System Safety and Security Officer?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Follow Up Action (Required, Recommended, and other comments)	
Code of Ethics	
Does your organization have a written Code of Ethics?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Does the Code of Ethics include all the required elements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Personal Conflict of Interest?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Organizational Conflict of Interest?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Identification and Prevention?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Does the Code of Ethics cover all employees, officers, board members and agents?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Follow Up Action (Required, Recommended, and other comments)	

<p>Are you familiar with the updates to 2 CFR 200 regarding grant awards, contractors, pass-thru entities and subrecipients? Which clauses? What is the effective date of the 2 CFR 200? Cobb Linc attendees are knowledgeable regarding the updates for subrecipient monitoring and procurements.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>

Nash, Paula

From: Smith, Pamela
Sent: Tuesday, March 1, 2022 2:47 PM
To: Nash, Paula
Subject: FW: [External] D&I Evaluation/Request for Additional Information B45064 Emergency On-Call Repairs and Maintenance for MARTA's Light Rail Overhead Contact System and Traction Power Substations
Attachments: EEO&AA policy CCG.pdf

Paula, please see the attached.
Pam

From: Michael Deer <mike.deer@c3mpowersystems.com>
Sent: Thursday, August 27, 2020 9:01 AM
To: Smith, Pamela <ptsmith@itsmarta.com>
Cc: Clifton, Rae <rclifton@itsmarta.com>
Subject: Re: [External] D&I Evaluation/Request for Additional Information B45064 Emergency On-Call Repairs and Maintenance for MARTA's Light Rail Overhead Contact System and Traction Power Substations

Pamelia:

Here is our full EEO/AA Plan. It goes in conjunction with the signed 2 page statement form for EEO/AA. (C3M Power Systems being a wholly owned subsidiary of Clark Construction Group).

I believe this covers your list of requirements. I'm told the corporate office is updating the plan, but no time frame was given to me on completion. Hopefully this one takes care of your needs for this RFP.

Hoping to get the updated EEO form back from the office today as well.

Thanks,

Thanks,

Michael Deer | Sr. Project Manager
C3M POWER SYSTEMS LLC
1030 Hampton Park Boulevard, Suite 200 | Capitol Heights, MD | 20743
m. 571.437.0885
Be sure to visit our new website: www.c3mpowersystems.com

On Thu, Aug 27, 2020 at 8:51 AM Smith, Pamela <ptsmith@itsmarta.com> wrote:

Great!

From: Michael Deer <mike.deer@c3mpowersystems.com>
Sent: Thursday, August 27, 2020 8:47 AM
To: Smith, Pamela <ptsmith@itsmarta.com>
Cc: Clifton, Rae <rclifton@itsmarta.com>

Subject: Re: [External] D&I Evaluation/Request for Additional Information B45064 Emergency On-Call Repairs and Maintenance for MARTA's Light Rail Overhead Contact System and Traction Power Substations

Working on the EEO/AA Plan now. We are getting it together now.

Michael Deer | Sr. Project Manager
C3M POWER SYSTEMS LLC
1030 Hampton Park Boulevard, Suite 200 | Capitol Heights, MD | 20743
m. 571.437.0885
Be sure to visit our new website: www.c3mpowersystems.com

On Thu, Aug 27, 2020 at 8:27 AM Smith, Pamela <ptsmith@itsmarta.com> wrote:

Good morning.

Thanks for the update; do you have an estimated ETA?

Pamela T. Smith • Manager, Supplier Diversity, MBA, CCA, MCA

Office of Diversity and Inclusion

 **MARTA** METROPOLITAN ATLANTA RAPID TRANSIT AUTHORITY

2424 Piedmont Road, NE • Atlanta, Georgia, 30324-3330

(404) 848-4646 • ptsmith@itsmarta.com • www.itsmarta.com

  Please consider the environment before printing this email.

From: Michael Deer <mike.deer@c3mpowersystems.com>

Sent: Wednesday, August 26, 2020 4:14 PM

To: Smith, Pamela <ptsmith@itsmarta.com>

Cc: Clifton, Rae <rclifton@itsmarta.com>

Subject: Re: [External] D&I Evaluation/Request for Additional Information B45064 Emergency On-Call Repairs and Maintenance for MARTA's Light Rail Overhead Contact System and Traction Power Substations

Pamelia:

I'm being told we do indeed have a corporate AAP, and we have emailed them to send the full doc over. I'll get it to you once I receive. I'm doubtful to see it today.

Thanks,

Michael Deer | Sr. Project Manager

C3M POWER SYSTEMS LLC

1030 Hampton Park Boulevard, Suite 200 | Capitol Heights, MD | 20743

m. 571.437.0885

Be sure to visit our new website: www.c3mpowersystems.com

On Wed, Aug 26, 2020 at 11:26 AM Smith, Pamelia <ptsmith@itsmarta.com> wrote:

Yes, this is an Equal Employment Policy statement as requested, but as you can see from the information provided to you regarding Affirmative Action Programs (AAP), more information will be needed.

Pamelia T. Smith • Manager, Supplier Diversity, MBA, CCA, MCA

Office of Diversity and Inclusion

 METROPOLITAN ATLANTA RAPID TRANSIT AUTHORITY

2424 Piedmont Road, NE • Atlanta, Georgia, 30324-3330

(404) 848-4646 • ptsmith@itsmarta.com • www.itsmarta.com

    Please consider the environment before printing this email.

From: Michael Deer <mike.deer@c3mpowersystems.com>
Sent: Wednesday, August 26, 2020 11:05 AM
To: Smith, Pamela <ptsmith@itsmarta.com>
Cc: Clifton, Rae <rclifton@itsmarta.com>
Subject: Re: [External] D&I Evaluation/Request for Additional Information B45064 Emergency On-Call Repairs and Maintenance for MARTA's Light Rail Overhead Contact System and Traction Power Substations

Pamelia,

First, I do have the corporate EEO and AA policy, signed by our corporate President.

This is from Clark Construction Group, which C3M Power Systems is a wholly owned subsidiary, so it is our policy as well.

Working on the EEO form, hopefully they get that back to me corrected as well today.

Thanks,

Michael Deer | Sr. Project Manager
C3M POWER SYSTEMS LLC
1030 Hampton Park Boulevard, Suite 200 | Capitol Heights, MD | 20743
m. 571.437.0885
Be sure to visit our new website: www.c3mpowersystems.com

On Wed, Aug 26, 2020 at 10:32 AM Smith, Pamela <ptsmith@itsmarta.com> wrote:

Good morning, Mr. Deer.

Thank you for speaking with me this morning regarding the additional items of information needed for the above MARTA solicitation per the bid submitted by C3M Power Systems, LLC.

Per our discussion, the following items of clarification/information are needed:

1. Updated EEO-1 form to clearly indicate the total number of males and females to include minority and ethnic employees. Currently as submitted, the form does not include the number of minority employees under the respective male and female categories for ALL EMPLOYEES so the total of males and females under ALL EMPLOYEES does not add up to the TOTAL OF ALL MALE AND FEMALE EMPLOYEES indicated as 192. The data indicated under Male and Female under the ALL EMPLOYEES category only adds up to 132 (124 Males +8 Females). Please update the attached form and re-submit.
2. The submitted EEO-1 form does not clearly indicate more than fifty (50) employees located at an outside of the Atlanta area location; therefore, I do need to request a copy of your firm's CURRENT Affirmative Action Program (AAP) which should also include the firm's Equal Opportunity Policy Statement signed by the authorized official.

Per our conversation, you indicated that you should be able to provide the requested items to me by the close of business today. Please advise if you are unable to do so within this timeframe.

Thank you for your time and attentiveness.

Please contact me directly with any need for additional information.

Pamelia T. Smith • Manager, Supplier Diversity, MBA, CCA, MCA

Office of Diversity and Inclusion

marta METROPOLITAN ATLANTA RAPID TRANSIT AUTHORITY

2424 Piedmont Road, NE • Atlanta, Georgia, 30324-3330

(404) 848-4646 • ptsmith@itsmarta.com • www.itsmarta.com



Please consider the environment before printing this email.

Nash, Paula

From: Smith, Pamela
Sent: Tuesday, March 1, 2022 2:41 PM
To: Nash, Paula
Subject: FW: MARTA APP for Peraton Quote 7958
Attachments: Peraton Remotec 2021 AAP.pdf

Paula, this was one of the awardees that we had to go back and forth with to even get an AAP.

From: Holmes, Rhonda <rholmes@itsmarta.com>
Sent: Friday, October 8, 2021 3:08 PM
To: Smith, Pamela <ptsmith@itsmarta.com>
Subject: RE: MARTA APP for Peraton Quote 7958

Hi Pamela,
Please confirm whether the attached AAP is acceptable associated with RFPP P48547 Andros Spartan Robot Upgrade.

Thanks,
Rhonda

From: Williams, Cynthia (PERATON) <Cynthia.Williams@peraton.com>
Sent: Friday, October 8, 2021 3:06 PM
To: Holmes, Rhonda <rholmes@itsmarta.com>
Cc: Smith, Pamela <ptsmith@itsmarta.com>
Subject: MARTA APP for Peraton Quote 7958

CAUTION: EXTERNAL SENDER Do not click any links, open any attachments, or REPLY to the message unless you trust the sender and know the content is safe.

Rhonda,

Attached is Remotec's AAP that you requested.

If you have any questions, please don't hesitate to contact me.

Thank you,

Cindy Williams

Contract Administrator
Mobile: 865.719.6680

DO THE CAN'T BE DONE.

Peraton

CONFIDENTIALITY NOTICE: This email and any attachments may contain material that is "Peraton Proprietary Information," confidential, privileged, and/or attorney work product for the sole use of the intended recipient. Any review, reliance, distribution, disclosure, or forwarding without expressed permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies without reading, printing or saving in any manner.

Nash, Paula

From: Smith, Pamela
Sent: Wednesday, February 23, 2022 10:43 AM
To: Smith, Pamela
Subject: FW: D & I Evaluation for Kimley-Horn Proposal submitted for AE46406, Design Services for Summerhill Bus Transit
Attachments: Kimley-Horn Schedule B.pdf; Kimley-Horn Southeast AAP Narrative 2020.pdf; Kimley-Horn Southeast AAP Technical 2020.pdf

From: Lickliter, Ashley <Ashley.Lickliter@kimley-horn.com>
Sent: Friday, January 15, 2021 11:30 AM
To: Smith, Pamela <ptsmith@itsmarta.com>; Atta, Kwadwo <Kwadwo.Atta@kimley-horn.com>
Cc: Cannon, Peris <pcannon@itsmarta.com>; McCombs, Kelli <Kelli.McCombs@kimley-horn.com>
Subject: RE: D & I Evaluation for Kimley-Horn Proposal submitted for AE46406, Design Services for Summerhill Bus Transit

Good Morning Pamela,

Hope you've had a wonderful week! Please find attached the additional information you've requested.

We've also put together a table illustrating the relevant NAICS code and services from the GDOT database should this be helpful in your evaluation. For Rohadfox specifically, the communications and systems integration design would fall under engineering services.

Firm	Services	Relevant NAICS Code	Relevant NAICS Services
Accura Engineering and Consulting Services, Inc.	Survey and Subsurface Utility Engineering (SUE)	54136 54137	Geophysical Surveying and Mapping Services Surveying and Mapping (except Geophysical) Services
Brindley Pieters & Associates, Inc. (BPA)	Drainage design, utility coordination, and permitting	54133 54134	Engineering Services Drafting Services
Cincar Consulting Group (C2G)	Agency coordination and approvals	54133 541611	Engineering Services Administrative Management and General Management Consulting Services
GO Systems and Solutions, LLC	Fare Collection Policy and Integration	54133 541611	Engineering Services Administrative Management and General Management Consulting Services
MC Squared, Inc. (MC2)	Geotechnical engineering (including soil testing)	54133 54138	Engineering Services Testing Laboratories
Rohadfox Construction Control Services	Project controls, project scheduling, document control, communications and systems	54133	Engineering Services

Please let us know if we can provide any additional clarification on the services our team and our critical DBE partners will be providing.

Thanks so much!

Ashley

Ashley C. Lickliter, P.E. | Vice President
Kimley-Horn | 1700 Willow Lawn Drive, Suite 200, Richmond, VA 23230
Direct: 804 672 4712 | Mobile: 757 560 0381

Celebrating 13 years as one of FORTUNE's 100 Best Companies to Work For

From: Smith, Pamela <ptsmith@itsmarta.com>
Sent: Friday, January 8, 2021 11:52 AM
To: Atta, Kwadwo <Kwadwo.Atta@kimley-horn.com>; Lickliter, Ashley <Ashley.Lickliter@kimley-horn.com>
Cc: Cannon, Peris <pcannon@itsmarta.com>
Subject: D & I Evaluation for Kimley-Horn Proposal submitted for AE46406, Design Services for Summerhill Bus Transit

Good day, ALL!

I am finalizing D & I's evaluation for the above MARTA solicitation and need some additional information as it relates to DBE participation and Equal Employment Opportunity, please.

1. Please provide an updated **Schedule B** (see attachment) to more clearly explain the tasks for which each DBE to be utilized to meet the established project DBE Goal (15%). Please use layperson's terms where possible and please in particular explain how the current NAICS codes for which Rohadfox is currently DBE certified relate to communications and systems integration in particular.
Rohadfox is currently certified under the following NAICS codes: 236220-Commercial and Institutional Building Construction; 237110-Water and Sewer Line and Related Structures Construction; Highway, Street and Bridge Construction and 541330-Engineering Services.
2. Please also update the **Schedule B** to reflect the **official** name under which each currently certified DBE received DBE certification.
3. Please provide a copy of the **currently** dated **Affirmative Action Plan (AAP)** for Kimley-Horn and Associates, Inc.

Please provide this information to me by the close of business on **Friday, January 15, 2021.**

You are welcome to contact me directly with any need for clarification at the e-mail and/or telephone number listed below.

Thank you.

Pamela T. Smith • Manager, Supplier Diversity, MBA, CCA, MCA
Office of Diversity and Inclusion

 **MARTA** METROPOLITAN ATLANTA RAPID TRANSIT AUTHORITY

2424 Piedmont Road, NE • Atlanta, Georgia, 30324-3330

EXHIBIT 12

EEO Policies



POLICY

DISCRIMINATION, HARASSMENT, AND RETALIATION PREVENTION

PREPARED BY: DIVERSITY & INCLUSION

EXECUTIVE DIRECTOR: PAULA NASH

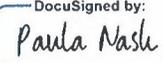
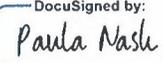
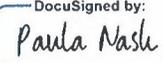
DATE: February 2021



 POLICY	ISSUE DATE 02-22-2021 Revision No.: 0	REFERENCE NO. DEO-PO-0040	Page 2 of 7
TITLE: Discrimination, Harassment, and Retaliation Prevention Policy			

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 POLICY	ISSUE DATE 02-22-2021 Revision No.: 0	REFERENCE NO. DEO-PO-0040	Page 3 of 7								
TITLE: Discrimination, Harassment, and Retaliation Prevention Policy											
ISSUING DEPARTMENT: Diversity and Inclusion											
PREPARED BY: Paula Nash, Executive Director of Diversity & Inclusion											
APPROVED BY: <table border="0" style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> Paula Nash <hr/> <i>Executive Dir of Diversity & Inclusion</i> </td> <td style="width: 50%; vertical-align: top;"> DocuSigned by:  <hr/> <i>Signature</i> </td> <td style="width: 50%; vertical-align: top;"> 2/11/2021 <hr/> <i>Date</i> </td> <td style="width: 50%; vertical-align: top;"> </td> </tr> <tr> <td style="vertical-align: top;"> Jeffrey A. Parker <hr/> <i>General Manager/CEO</i> </td> <td style="vertical-align: top;"> DocuSigned by:  <hr/> <i>Signature</i> </td> <td style="vertical-align: top;"> 2/12/2021 <hr/> <i>Date</i> </td> <td style="vertical-align: top;"> </td> </tr> </table>				Paula Nash <hr/> <i>Executive Dir of Diversity & Inclusion</i>	DocuSigned by:  <hr/> <i>Signature</i>	2/11/2021 <hr/> <i>Date</i>		Jeffrey A. Parker <hr/> <i>General Manager/CEO</i>	DocuSigned by:  <hr/> <i>Signature</i>	2/12/2021 <hr/> <i>Date</i>	
Paula Nash <hr/> <i>Executive Dir of Diversity & Inclusion</i>	DocuSigned by:  <hr/> <i>Signature</i>	2/11/2021 <hr/> <i>Date</i>									
Jeffrey A. Parker <hr/> <i>General Manager/CEO</i>	DocuSigned by:  <hr/> <i>Signature</i>	2/12/2021 <hr/> <i>Date</i>									
Supersedes:											

General

A. Policy Statement

The Metropolitan Atlanta Rapid Transit Authority (“MARTA” or the “Authority”) does not tolerate and prohibits discrimination or harassment of or against our job applicants, contractors, interns, volunteers, or employees by another employee, supervisor, vendor, customer, or any third party on the basis of race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth and related medical conditions), gender identity or gender expression (including transgender status), sexual orientation, marital status, military service and veteran status, physical or mental disability, genetic information, or any other characteristic protected by applicable federal, state, or local laws and ordinances (referred to as “protected characteristics”). The Authority also prohibits retaliation as defined below.

B. Purpose

MARTA is committed to a workplace free of discrimination, harassment and retaliation. These behaviors are unacceptable in the workplace and in any work-related settings such as business trips and Authority sponsored social functions, regardless of whether the conduct is engaged in by a supervisor, co-worker, client, customer, vendor or other third party. MARTA further prohibits discrimination, harassment and retaliation which affects any aspect of employment including hiring, assignments, working conditions, salary and benefits, performance evaluations, promotions, training, transfers, discipline, terminations, and any other terms and conditions of employment. In addition to being a violation of this policy discrimination, harassment or retaliation based on any protected characteristic pursuant to applicable federal, state, or local laws and ordinances also is unlawful. For example, retaliation against an individual because the individual filed a complaint of sexual harassment

 POLICY	ISSUE DATE 02-22-2021 Revision No.: 0	REFERENCE NO. DEO-PO-0040	Page 4 of 7
TITLE: Discrimination, Harassment, and Retaliation Prevention Policy			

or because an individual aided, assisted or testified in an investigation or proceeding involving a complaint of sexual harassment is unlawful.

C. Revision/Review

The contents of this document will be reviewed on **01-31-2022** and **01-31** of each even numbered year, thereafter. The **Executive Director of Diversity & Inclusion** will review this document and forward for revisions to the **General Manager** by **02-01**.

D. Applicability

MARTA employees, job applicants, contractors, interns, volunteers, vendor, customer, or any third-party.

E. Definitions

Discrimination	Discrimination under this policy means treating differently or denying or granting a benefit to an individual because of the individual's protected characteristic.
Harassment	<p>Harassment generally is defined in this policy as unwelcome verbal, visual or physical conduct that denigrates or shows hostility or aversion towards an individual because of any protected characteristic where such conduct is severe or pervasive and has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.</p> <p>Harassment can be verbal (including slurs, jokes, insults, epithets, gestures or teasing); visual (including offensive posters, symbols, cartoons, drawings, computer displays, text messages, social media posts or e-mails); non-verbal (leers, staring); physical (threats, movement towards others in a hostile manner, assaults, touching, pushing, brushing against another employee's body or poking another employee's body; blocking someone's ability to enter or leave; or assaults resulting in rape, molestation, touching of a sexual nature).</p> <p>Even if such foregoing conduct may not rise to the level of being unlawful in a given instance, such conduct nonetheless violates MARTA policy and will be subject to disciplinary action. Because it can be difficult to define unlawful harassment, employees are expected to behave at all times in a manner consistent with the intended purpose of this policy.</p>
Sexual Harassment	Sexual harassment can include all of the above actions when taken on the basis of the person's gender, as well as other unwelcome conduct, such as unwelcome or unsolicited sexual advances, requests for sexual favors, conversations regarding sexual activities

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TITLE: Discrimination, Harassment, and Retaliation Prevention Policy			

	<p>and other verbal or physical conduct of a sexual nature when:</p> <ul style="list-style-type: none"> • Submission to that conduct or those advances, or requests is made either explicitly or implicitly a term or condition of an individual's employment; or • Submission to or rejection of the conduct or advances or requests by an individual is used as the basis for employment decisions affecting the individual; or • The conduct or advances or requests have the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment. <p>Examples of conduct that violate this policy include:</p> <ul style="list-style-type: none"> • unwelcome sexual advances, flirtations, advances, leering, whistling, touching, pinching, assault, blocking normal movement • requests for sexual favors or demands for sexual favors in exchange for favorable treatment • obscene or vulgar gestures, posters, or comments • sexual jokes or comments about a person's body, sexual prowess, or sexual deficiencies • propositions, or suggestive or insulting comments of a sexual nature • derogatory cartoons, posters, and drawings • sexually explicit e-mails, voicemails, texts, or social media memes or posts • uninvited touching of a sexual nature • unwelcomed sexually related comments • conversation about one's own or someone else's sex life • conduct or comments consistently targeted at only one gender, even if the content is not sexual • teasing or other conduct directed toward a person because of the person's gender
Retaliation	Retaliation means adverse action taken because an individual reported an actual or perceived violation of this policy, opposed practices prohibited by this policy, or participated in the reporting and investigation process described below. "Adverse conduct" includes but is not limited to: any action that would discourage an employee from reporting discrimination, harassment or retaliation; shunning and avoiding an individual who reports discrimination, harassment or retaliation or encouraging or permitting others to shun or avoid an individual who reported or participated in an investigation of a

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TITLE: Discrimination, Harassment, and Retaliation Prevention Policy			

	violation of this policy; express or implied threats or intimidation intended to prevent an individual from reporting discrimination, harassment or retaliation; or denying employment benefits because an applicant or employee reported discrimination, harassment or retaliation or participated in the reporting and investigation process described below.
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II. Reporting Procedure

If an employee believes someone has violated this policy or our Equal Employment Opportunity Policy, the employee should promptly bring the matter to the immediate attention of his or her supervisor, the supervisor's manager or MARTA's Office of Diversity and Inclusion. Your initial complaint may be verbal, written or by phone (404-848-5240). MARTA's Office of Diversity and Inclusion maintains a report form if you would prefer to use it as a guide. Simply stop by, send an email request for the form, or obtain it online on MARTA's website.

If the employee makes a complaint under this policy and has not received a response of receipt within five (5) business days, the employee should contact Paula Nash, Executive Director of Office of Diversity and Inclusion, pmnash@itsmarta.com.

Every Team Lead, Supervisor, or Manager who learns of any employee's concern about conduct in violation of this policy or our Equal Employment Opportunity Policy, whether in a formal complaint or informally, or who otherwise is aware of conduct in violation of this policy is required to and must immediately report the issues raised or conduct to the Office of Diversity and Inclusion..

III. Investigation Procedures

Upon receiving a complaint, the Authority will promptly conduct a fair and thorough investigation into the facts and circumstances of any report of a violation of this policy or our Equal Employment Opportunity policy to ensure due process for all parties. To the extent possible, the Authority will endeavor to keep the reporting employee's concerns confidential. However, complete confidentiality may not be possible in all circumstances in order to properly investigate the claims. Employees are required to cooperate in all investigations conducted pursuant to this policy.

During the investigation, the Authority generally will interview the complainant and the accused; ask each to identify any witnesses to the conduct; conduct further witness interviews as necessary; and review any relevant documents or other information. Upon completion of the investigation, the Authority will determine whether this policy or our Equal Employment Opportunity policy has been violated based upon its reasonable evaluation of the information gathered during the investigation. The Authority will inform the complainant and the accused of the results of the investigation.

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TITLE: Discrimination, Harassment, and Retaliation Prevention Policy			

The Authority will take corrective measures against any person found to have violated this policy, and/or the Authority's Equal Employment Opportunity policy, as it deems appropriate. Corrective or disciplinary action may include, but is not limited to, training, coaching or counseling, written warning, suspension, or immediate termination. Anyone, regardless of position or title, whom the Authority determines has engaged in conduct that violates this policy or our Equal Employment Opportunity policy will be subject to discipline, up to and including immediate termination. This includes individuals engaging in discrimination, harassment or retaliation, as well as Team Leaders, supervisors, or Managers who fail to report violations of this policy, or knowingly allowed prohibited conduct to continue. Individuals who engage in conduct that rises to the level of a violation of law can be held personally liable for such conduct.

Final Note:

MARTA's policy on Equal Employment Opportunity is posted at prominent locations throughout the Authority's facilities and on its website. Management officials are responsible for ensuring that the policy statement remains posted on all official bulletin boards. Inquiries regarding EEO issues and the procedures to follow for allegations of discrimination should be referred to MARTA's Office of Diversity and Inclusion.

Please keep in mind that MARTA cannot remedy claimed discrimination, harassment, or retaliation unless you bring these claims to the attention of management. The Office of Diversity and Inclusion reserves the right not to investigate complaints brought after 180 days from the last date of occurrence due to untimeliness. It is each person's obligation to timely report conduct to which they were subjected or conduct they witnessed even if not directed to you, if you believe such conduct violates this "Discrimination, Harassment, and Retaliation Prevention Policy" or the Authority's Equal Employment Opportunity policy.

For additional information or assistance, please contact the MARTA Office of Diversity and Inclusion.



METROPOLITAN ATLANTA RAPID TRANSIT AUTHORITY

RELIGIOUS DISCRIMINATION

PREPARED BY: DIVERSITY & INCLUSION
EXECUTIVE DIRECTOR: PAULA NASH
DATE: MARCH 2021



 POLICY	ISSUE DATE 03-08-2021 Revision No.: 00	REFERENCE NO. DI-PO-0041	Page 2 of 8
TYPE: Religious Discrimination			

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TYPE: Religious Discrimination			

ACKNOWLEDGEMENT OF REVIEW

REVIEWER	SIGNATURE	DATE
ELIZABETH M. O'NEILL CHIEF LEGAL COUNSEL	<p>DocuSigned by: <i>Elizabeth M. O'Neill</i> 6D49C2012083429...</p>	3/12/2021

 POLICY	ISSUE DATE 03-08-2021 Revision No.: 00	REFERENCE NO. DI-PO-0041	Page 4 of 8								
TYPE: Religious Discrimination											
ISSUING DEPARTMENT: Diversity and Inclusion											
PREPARED BY: Paula Nash, Executive Director of Diversity & Inclusion											
APPROVED BY: <table border="0" style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> Paula Nash <i>Executive Director, Diversity & Inclusion</i> </td> <td style="width: 50%; vertical-align: top;"> DocuSigned by:  Signature <small>ES2B1E6926F348C...</small> </td> <td style="width: 50%; vertical-align: top;"> 3/9/2021 Date </td> <td style="width: 50%;"></td> </tr> <tr> <td style="vertical-align: top;"> Jeffrey A. Parker <i>General Manager/CEO</i> </td> <td style="vertical-align: top;"> DocuSigned by:  Signature <small>1A3E11CD5F774C9...</small> </td> <td style="vertical-align: top;"> 3/13/2021 Date </td> <td></td> </tr> </table>				Paula Nash <i>Executive Director, Diversity & Inclusion</i>	DocuSigned by:  Signature <small>ES2B1E6926F348C...</small>	3/9/2021 Date		Jeffrey A. Parker <i>General Manager/CEO</i>	DocuSigned by:  Signature <small>1A3E11CD5F774C9...</small>	3/13/2021 Date	
Paula Nash <i>Executive Director, Diversity & Inclusion</i>	DocuSigned by:  Signature <small>ES2B1E6926F348C...</small>	3/9/2021 Date									
Jeffrey A. Parker <i>General Manager/CEO</i>	DocuSigned by:  Signature <small>1A3E11CD5F774C9...</small>	3/13/2021 Date									
SUPERSEDES:											

I. General

A. Scope

MARTA is committed to observing and enforcing policies that establishes the rights of applicants and employees to engage in their respective religious beliefs and practices without discrimination or discriminatory harassment. Additionally, this procedure provides a framework for the request, review, approval, and denial of requests for religious accommodations by MARTA employees and applicants.

B. Purpose

The Metropolitan Atlanta Rapid Transit Authority (MARTA) prohibits discrimination based on religion, in accordance with Title VII of the Civil Rights Act of 1964 (as amended). It is the policy of MARTA to afford any employee every available opportunity to engage in their sincerely held religious beliefs or no beliefs at all, while maintaining their employment. This policy reaffirms MARTA's zero tolerance for discrimination based on religion. MARTA's management will act to ensure the rights and privileges of its employees by fulfilling its duty to provide reasonable accommodation of applicant's and employees' religious observances, practices, and/or beliefs; so long as such accommodation does not present an undue hardship to MARTA, its business practices, operations, or compromise safety or security.

C. Revision/Review

The contents of this document will be reviewed on **03-31-2022** and **03-31** of each even numbered year, thereafter. The **Executive Director of Diversity & Inclusion** will review this document with recommendations for revisions forwarded to the **General Manager** by **03-01**.

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D. *Applicability*

This religious discrimination policy applies to all MARTA employees and applicants for employment.

E. *Definitions*

TERM	DEFINITION
Religious Beliefs	Religion includes not only traditional, organized religions, such as Christianity, Judaism, Islam, Hinduism, and Buddhism, but also religious beliefs that are new, uncommon, not part of a formal church or sect, only subscribed to by a small number of people, or that seem illogical or unreasonable to others. An employee's belief or practice can be "religious" even if the employee is affiliated with a religious group that does not espouse or recognize that individual's belief or practice, or if few – or no – other people adhere to it. Protection also extend to those who are discriminated against or need accommodation because they profess no religious beliefs.
Religious Observances or Practices	This includes, for example, attending worship services, praying, wearing religious garb or symbols, displaying religious objects, adhering to certain dietary rules, proselytizing or other forms of religious expression, or refraining from certain activities. Whether a practice is religious depends on the employee's motivation. The same practice might be engaged in by one person for religious reasons and by another person for purely secular reasons (<i>e.g.</i> , dietary restrictions, tattoos, etc.)
Religious Accommodation	Any change or adjustment to an employment practice, rule, procedure, or condition of employment undertaken to accommodate or permit a prospective or current employee to exercise his/her religious beliefs or practices. Such accommodations may include adjustment to dress code or uniform requirements, shift or work schedule changes, or other adaptations to meet an

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TYPE: Religious Discrimination

TERM	DEFINITION
	employee's religious needs. An accommodation must only meet the prospective or current employee's religious needs and does not have to be the accommodation requested, even if the requested accommodation does not present an undue hardship to the authority. Any accommodation which presents an undue hardship to the authority is not reasonable and will not be approved.
Undue Hardship	Can include, without limitation, any accommodation that results in disruption of MARTA's work environment, impedes the provision of transit services, and/or infringes on the rights and privileges of other MARTA employees, or results in significant financial burden to the authority. Furthermore, undue hardship may refer to accommodations that are unduly expensive, substantial, disruptive, or that would fundamentally alter agency operation requirements, the nature or operation of the MARTA business, or the essential functions of a job. Accommodations which interfere with the safe and efficient operation of the workplace or with a bona fide seniority system will often present an undue hardship.
Religious Discrimination	Any of the following can constitute religious discrimination: 1) treating applicants or employees differently based on their religious beliefs or practices – or lack thereof – in any aspect of employment, including recruitment, hiring, assignments, discipline, demotion, promotion, and benefits (disparate treatment); 2) subjecting employees to harassment because of their religious beliefs or practices – or lack thereof – or because of the religious practices, beliefs, -or lack thereof- of people with whom they associate; 3) denying a requested reasonable accommodation of an applicant's or employee's sincerely held religious beliefs or practices.
De Minimis	Any insignificant incurred costs, in labor or other materials, and any insignificant

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TYPE: Religious Discrimination			

TERM	DEFINITION										
Harassment	disruption to the Authority. An act or pattern of conduct which serves to create an offensive, intimidating, demeaning, or hostile environment, including but not limited to: <table border="0" data-bbox="846 554 1419 726"> <tr> <td>Offensive Comments</td> <td>Epithets</td> </tr> <tr> <td>Offensive Jokes</td> <td>Derogatory Names</td> </tr> <tr> <td>Slurs</td> <td>Insults</td> </tr> <tr> <td>Cartoons & Posters</td> <td>Pictures</td> </tr> <tr> <td>Texts, IMs, Emails</td> <td>Social Media Posts</td> </tr> </table>	Offensive Comments	Epithets	Offensive Jokes	Derogatory Names	Slurs	Insults	Cartoons & Posters	Pictures	Texts, IMs, Emails	Social Media Posts
Offensive Comments	Epithets										
Offensive Jokes	Derogatory Names										
Slurs	Insults										
Cartoons & Posters	Pictures										
Texts, IMs, Emails	Social Media Posts										

F. *Responsibilities*

The individual(s) responsible for performing this policy is/are ...

Employees

Each employee is responsible for his/her own behavior. Employees are expected to respect the religious beliefs of their co-workers. Employees are expected to report any discrimination based on religion which they believe they have been subjected to. Employees are expected to report any discriminatory treatment or harassment, to management or to the Office of Diversity & Inclusion, which they have witnessed or that they feel has occurred.

Managers & Supervisors

All supervisors/managers are responsible for implementation of the Authority's nondiscrimination policies, including this policy, and for ensuring that all employees they supervise have knowledge of and understand the policy. Supervisors/managers shall advise employees seeking religious accommodation to review this policy and complete required forms. After notification or learning of any employee's complaint of discrimination under this policy, the supervisor/manager must immediately report the matter to the Office of Diversity & Inclusion.

Office of Diversity & Inclusion

The Office of Diversity & Inclusion's responsibility will be to conduct training sessions and ensure wide dissemination of this policy and its provisions to all employees.

The Office of Diversity & Inclusion will conduct complete, thorough, and timely investigations of all complaints and alleged instances of religious discrimination and harassment and provide remedies to complaining parties as appropriate.

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TYPE: Religious Discrimination			

II. Process

GUIDELINES ON RELIGIOUS & UNRELIGIOUS EXPRESSION IN THE WORKPLACE:

These guidelines seek to address the religious and unreligious expression of MARTA's prospective and current employees when they are acting in their personal capacity within the workplace. The guidelines do not address whether and when MARTA employees may engage in religious or unreligious speech directed at the public. Such expression may be restricted if it interferes with workplace efficiency.

1. Employees are permitted to engage in private religious or unreligious expression in personal work areas not regularly open to the public to the same extent that they may engage in nonreligious private expression, subject to reasonable restrictions.
2. Employees are permitted to engage in religious or unreligious expression directed at fellow employees, to the same extent that they may engage in nonreligious private expression, subject to reasonable restrictions. Such expression may be restricted if it interferes with workplace efficiency. Employees must refrain immediately from such expression when a fellow employee asks that it stop or otherwise demonstrates that it is unwelcomed or offensive.
3. Employees should not engage in religious or unreligious expression directed at fellow employees when they are already aware that their coworker finds such expression unwelcome or offensive. At all times employees should be guided by general principles of civility and workplace efficiency and tolerance.
4. MARTA's Office of Diversity & Inclusion policies and procedures prohibit employees from being subjected to a hostile work environment or from religious harassment, whether by supervisors or fellow workers. However, a hostile work environment is not created by the bare expression of speech with which some employees might disagree. In a country founded on freedom of speech and religion, employees should at times expect to be exposed to ideas with which they disagree. Please refer to MARTA's policies and/or contact the Office of Diversity & Inclusion for more specific direction.

III. Relevant Policies

The following policies, administrative guidelines and forms are used in conjunction with this procedure:

- Discrimination, Harassment and Retaliation Prevention Policy
- Equal Employment Opportunity Policy
- Religious Accommodation Procedure



METROPOLITAN ATLANTA RAPID TRANSIT AUTHORITY

RELIGIOUS ACCOMMODATIONS

**PREPARED BY: DIVERSITY & INCLUSION
EXECUTIVE DIRECTOR: PAULA NASH
DATE: MARCH 2021**



 PROCEDURE	ISSUE DATE 03-08-2021 Revision No.: 00	REFERENCE NO. DI-PR-0040	Page 2 of 8
TYPE: Religious Accommodations			

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TYPE: Religious Accommodations			

ACKNOWLEDGEMENT OF REVIEW

REVIEWER	SIGNATURE	DATE
ELIZABETH M. O'NEILL CHIEF LEGAL COUNSEL	DocuSigned by: <i>Elizabeth M. O'Neill</i> 6D49C2012083429...	3/12/2021

 PROCEDURE	ISSUE DATE 03-08-2021 Revision No.: 00	REFERENCE NO. DI-PR-0040	Page 4 of 8								
TYPE: Religious Accommodations											
ISSUING DEPARTMENT: Diversity & Inclusion											
PREPARED BY: Executive Director of Diversity & Inclusion											
APPROVED BY: <table border="0" style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> Paula Nash <i>Executive Director, Diversity & Inclusion</i> </td> <td style="width: 50%; vertical-align: top;"> DocuSigned by:  <small>Signature</small> </td> <td style="width: 50%; vertical-align: top;"> 3/9/2021 <small>Date</small> </td> <td style="width: 50%; vertical-align: top;"> <small>ER2B1E68B6F348C...</small> </td> </tr> <tr> <td style="width: 50%; vertical-align: top;"> Jeffrey A. Parker <i>General Manager/CEO</i> </td> <td style="width: 50%; vertical-align: top;"> DocuSigned by:  <small>Signature</small> </td> <td style="width: 50%; vertical-align: top;"> 3/13/2021 <small>Date</small> </td> <td style="width: 50%; vertical-align: top;"> <small>1A3E11CD5F774C9...</small> </td> </tr> </table>				Paula Nash <i>Executive Director, Diversity & Inclusion</i>	DocuSigned by:  <small>Signature</small>	3/9/2021 <small>Date</small>	<small>ER2B1E68B6F348C...</small>	Jeffrey A. Parker <i>General Manager/CEO</i>	DocuSigned by:  <small>Signature</small>	3/13/2021 <small>Date</small>	<small>1A3E11CD5F774C9...</small>
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SUPERSEDES:											

I. General

A. Scope

MARTA is committed to providing a work environment that is respectful of the religious beliefs of its employees. As part of this commitment, MARTA will make good faith efforts to provide reasonable religious accommodation to employees (to include interns and contractors) who's sincerely held religious beliefs conflict with a MARTA policy, procedure, or other academic or employment requirement **unless such an accommodation would create an undue hardship.**

B. Purpose

MARTA is committed to observing and enforcing policies that establishes the rights of applicants and employees to engage in their respective religious beliefs and practices without discrimination or discriminatory harassment. Additionally, this procedure provides a framework for the request, review, approval and denial of requests for religious accommodations by MARTA employees and applicants.

C. Review

The contents of this document will be reviewed on **03-31-2022** and **03-31** of each even numbered year, thereafter. The **Executive Director of Diversity & Inclusion** will review this document with recommendations for revisions forwarded to the **General Manager** by **03-01**.

D. Applicability

This religious accommodations' procedure applies to all MARTA employees and applicants for employment.

 PROCEDURE	ISSUE DATE 03-08-2021 Revision No.: 00	REFERENCE NO. DI-PR-0040	Page 5 of 8
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E. Definitions

TERM	DEFINITION
Religion or Creed	Includes traditional, organized religions but also religious beliefs, including those that are new, uncommon, not part of a formal church or sect. All aspects of religious belief, non-belief, and observance that are sincerely held will be considered as part of this policy.
Religious Accommodation	A reasonable change in the work environment that enables employee, intern or contractor to practice or otherwise observe a sincerely held religious practice or belief without undue hardship on MARTA. A reasonable religious accommodation may include but is not limited to time for prayer during a work day, the ability to attend religious events or observe a religious holiday, or other requirement for an employee's, contractor or intern religious beliefs, non-belief observance or practice, provided such accommodation is reasonable and does not cause undue hardship. A reasonable accommodation may not include permitting one person's religious beliefs to override or interfere with the beliefs of others.
Undue Hardship	Significant difficulty or expense based on MARTA resources and circumstances in relationship to the cost, operation or difficulty of providing a specific accommodation. Undue hardship may refer to financial or operational difficulty in providing an accommodation or accommodations that are unduly expensive, substantial, disruptive, or that would fundamentally alter agency operation requirements, the nature or operation of the MARTA business, or the essential functions of a job. Accommodations which interfere with the safe and efficient operation of the workplace or with a bona fide seniority system will often present an undue hardship.
Religious Accommodation Procedure	The administration of the Religious Discrimination and the Religious Accommodation Procedures are the responsibility of the Office of Diversity & Inclusion (D&I). The following are the listed steps and procedures in an employee requesting religious accommodation:

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F. *Responsibilities*

Employees

1. An employee who is seeking a reasonable change in the work environment to practice or otherwise observe a sincerely held religious practice or belief should request an accommodation from his/her manager, supervisor or the Office of Diversity and Inclusion through the process detailed below.
2. An employee who believes he/she has been improperly denied a religious accommodation should report such religious discrimination to the Office of Diversity and Inclusion.
3. Complaints of religious discrimination or harassment should be brought to the attention of the affected employee's management, and/or the Office of Diversity & Inclusion immediately. All employees are strongly encouraged to use this complaint procedure if they believe they have been subjected to religious discrimination (including the improper denial of religious accommodation), or religious harassment or have knowledge of any such treatment.
4. An employee may also, at any time, file a complaint with the U. S. Equal Employment Opportunity Commission (EEOC) within 180 days of the date of the last occurrence of alleged religious discrimination.

Managers & Supervisors

1. All supervisors/managers are responsible for implementation of MARTA's Religious Discrimination and Religious Accommodation policies and procedures, and for ensuring that all employees they supervise have knowledge of and understand these policies.
2. All supervisors/managers must ensure location(s) are made available for employees seeking a religious accommodation to post notices soliciting for other employees to volunteer to change shifts.
3. After notification or learning of any employee's complaint of religious discrimination or harassment by formal/informal complaint, observation, or other means, the supervisor/manager must immediately report the matter to the Office of Diversity & Inclusion.

Office of Diversity & Inclusion

1. The Executive Director of the Office of Diversity & Inclusion shall ensure prompt and thorough investigation of all complaints of discrimination, harassment, or retaliation covered by Title VII filed by employees/applicants/customers.
2. The Executive Director of the Office of Diversity & Inclusion or designee shall inform the complaining individual of the outcome of the investigation in writing.

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TYPE: Religious Accommodations			

Department of Human Resources

Documentation of all requests for religious accommodation will be forwarded to Human Resources and will be maintained in the confidential section of personnel files of the requesting employee.

II. Process

A. Requesting a Religious Accommodation

1. Any employee seeking a religious accommodation should complete the attached approved request form. Once completed, the employee should submit the completed form to their respective supervisor or manager for review and consideration. An employment applicant seeking a religious accommodation should also complete a request form. Upon completion of the form the applicant should submit the completed form to their Human Resources Recruiter.
2. Upon receipt of a completed form, any member of management should notify the Office of Diversity & Inclusion, via e-mail, of the request. The notice must include the name of the requesting individual, the date the request is received, and the management person who will be rendering the decision on the request. The Office of Diversity & Inclusion will provide guidance to management during the review process. The Office of Diversity & Inclusion will also consult with management to identify possible accommodation options, and management will select the best available option, if any, based on business needs.
3. Applicants' requests will be considered only once the requesting employment applicant has been identified as the candidate for hire. Such a request, however, is not an automatic disqualifier of hiring consideration. Where a Human Resources Recruiter receives a completed form from a selected candidate, he/she should notify the Office of Diversity & Inclusion, via e-mail, of the request. The notice should include the name of the requesting individual, the date the request is received, and the department to which the selected applicant will be assigned. The Human Resources Recruiter shall also forward the request to the hiring manager or training management for consideration and rendering of the decision on the request. Prior to the candidate's start of their work assignment, the Office of Diversity & Inclusion will provide guidance to management during the review process. The Office of Diversity & Inclusion will also consult with management to identify possible accommodation options and management will select the best available option, if any, based on business needs.

B. Approval Procedure

1. Directors/Managers shall review all requests and determine if the requested accommodation would affect the collectively bargained rights of other employees because of negotiated seniority rights or other privileges contained in the labor agreement.
2. If approved by management, an employee may solicit another employee to make any necessary shift change as part of the religious accommodation process. The

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3. requesting employee may post a notice soliciting volunteers to makeshift changes. Any represented employee volunteering to make a shift change will do so, in writing, for the mark-up in question only. Any non-represented employee volunteering to make a shift change must indicate the period for which they are volunteering to change shifts on the form. Management should take note of shift changes resulting in overtime hours.
4. Once the completed form and any volunteer documentation has been completed and submitted, the director/manager will review the request.
 - a) If the requested religious accommodation can be approved, the director/manager will note, on the form, the approval, the date the approved accommodation will begin, and the anticipated duration of the accommodation.
 - b) If the requested religious accommodation will present an undue hardship (i.e., violate any rights or privileges under the negotiated labor agreement, require overtime costs to replace the requesting employee, impede the work unit's performance or productivity, etc.), the director/manager will note on the form the denial of the religious accommodation and the reason.
5. Copies of the approved/denied religious accommodation form will be retained in the employee's departmental file, forwarded to the requesting employee, forwarded to Human Resources for retention in the employee's personnel file, and to the Office of Diversity & inclusion.

III. Enforcement Procedure and Guidelines

MARTA will make every reasonable effort to prevent and detect religious discrimination and harassment. MARTA will conduct complete and thorough investigations of all complaints and alleged instances of religious discrimination and harassment in a timely manner and to provide remedies to complaining parties as appropriate.

IV. Relevant Policies

The following policies, administrative guidelines and forms are used in conjunction with this procedure:

- Discrimination, Harassment and Retaliation Prevention Policy
- Equal Employment Opportunity Policy
- Religious Discrimination Procedure

**Metropolitan Atlanta Rapid Transit Authority
Office of Diversity & Inclusion**



RELIGIOUS ACCOMMODATION REQUEST

EMPLOYEE INFORMATION

Date: _____

Name of Employee/Job Title Requesting Religious Accommodation: _____

Email Address: _____ Phone Number: _____

Employee's Department/ Work Unit: _____

Status: (Check One) Employee __ Intern __ Contract Professional __ Applicant __

Supervisor Name/Title: _____

Phone Number: _____

A reasonable religious accommodation is a change in the work environment or changes in assigned duties and/or responsibility performed that enables an employee to participate in his/her religious practice or belief without creating an undue hardship on MARTA business. In order to consider your request for a religious accommodation, please provide the following information:

ACCOMMODATION INFORMATION

Please specify what workplace accommodation you request: (For example, time to pray, leave work to attend a religious observance, wear religious attire to work, etc.):

Please identify your religious practice or belief and state how this accommodation enables you to participate in your religious practice or belief without impacting your ability to meet the essential functions of your job:

Please state the date[s] or frequency of the requested accommodation (For example, daily, weekly, a specific date):

If you have requested this religious accommodation before, please state when the request was made, and the outcome of the request:

IF NECESSARY, PLEASE USE ADDITIONAL SHEETS FOR ANY OF THE INFORMATION REQUESTED.

If requested, can you obtain documentation or other authority to support the need for an accommodation based on your religious practice or belief? (Check One) Yes _____ No _____

Signature: _____

Date: _____

FOR D&I/EEO USE ONLY

Received by: _____ Date received: _____

ACCOMMODATION IS: GRANTED / DENIED

EXHIBIT 13

Employee Complaint Form and Procedures

COMPLAINT OF DISCRIMINATION



OFFICE OF DIVERSITY & INCLUSION

OFFICE USE ONLY

Case Number: _____

Metropolitan Atlanta Rapid Transit Authority's (MARTA) DISCRIMINATION COMPLAINT FORM

COMPLETED FORM SHOULD BE RETURNED TO:

MARTA OFFICE OF DIVERSITY & INCLUSION

2424 Piedmont Rd., NE, Atlanta, Georgia 30324

Phone (404) 848-4455

PLEASE COMPLETE THE FOLLOWING INFORMATION:

Last Name: _____ First: _____ M.I. _____

Home Telephone: _____ Cell Phone: _____

Work Telephone: _____ Email: _____

Address: _____

Job Title/Classification: _____

Work Unit/Dept.: _____

Supervisor and Job Title: _____

Status (Please check one): Employee Supervisor Contractor Other/External

If Other/External, please specify: _____

WHAT IS THE BASIS OF YOUR COMPLAINT? (CHECK ALL THAT APPLY)

- Race Color Religion National Origin
- Sex Discrimination (Includes Sexual Orientation, Gender Identity, or Pregnancy)
- Age (40 or Older) Disability Veteran Status Marital Status
- Parental Status Retaliation Sexual Harassment Genetic Information
- Other _____

COMPLAINT OF DISCRIMINATION



OFFICE OF DIVERSITY & INCLUSION

WHAT IS THE ISSUE ASSOCIATED WITH YOUR COMPLAINT? (CHECK ALL THAT APPLY)

- | | | |
|--|--|---|
| <input type="checkbox"/> Admission | <input type="checkbox"/> Compensation | <input type="checkbox"/> Demotion |
| <input type="checkbox"/> Discharge/Termination | <input type="checkbox"/> Disciplinary Action | <input type="checkbox"/> Failure to accommodate |
| <input type="checkbox"/> Failure to Hire/Non-selection | <input type="checkbox"/> Grading | <input type="checkbox"/> Harassment |
| <input type="checkbox"/> Hostile Work Environment | <input type="checkbox"/> Non-promotion | <input type="checkbox"/> Performance Evaluation |
| <input type="checkbox"/> Sexual Harassment | <input type="checkbox"/> Transfer | <input type="checkbox"/> Work Conditions |
| <input type="checkbox"/> Other _____ | | |

WHO DO YOU ALLEGE DISCRIMINATED AGAINST YOU (RESPONDENT)?

Name

Job Title

_____	_____
_____	_____
_____	_____
_____	_____

WHEN DID THE ALLEGED DISCRIMINATION OCCUR? _____

DESCRIBE WHAT HAPPENED. (Please provide as much detail as possible and include information such as dates, locations, persons involved or present, behaviors, comments, other incidents, etc. Please attach additional paper if necessary).

COMPLAINT OF DISCRIMINATION



OFFICE OF DIVERSITY & INCLUSION

LIST ALL WITNESSES (IF ANY) TO THE INCIDENTS YOU DESCRIBED:

Name

Contact Number

<hr/>	<hr/>

HAVE EFFORTS BEEN MADE TO RESOLVE THIS COMPLAINT WITH A SUPERVISOR OR OFFICIAL?

(Circle one) Yes No IF YES, PLEASE INDICATE THE INDIVIDUAL(S), DATE OF COMPLAINT, AND THE STATUS OF THE COMPLAINT.

WHAT IS YOUR REQUESTED REMEDY (WHAT CORRECTIVE ACTION DO YOU BELIEVE WOULD RESOLVE YOUR COMPLAINT)?

Are you willing to participate in counseling, mediation, or facilitation to seek an early resolution of your claim(s)? (Check one)

Yes

No

COMPLAINT OF DISCRIMINATION



OFFICE OF DIVERSITY & INCLUSION

If yes, please select which form of early resolution you would prefer (Circle One):

Counseling

Mediation

Facilitation

HAVE YOU FILED A PREVIOUS COMPLAINT OF DISCRIMINATION? (Circle one)

Yes No

IF SO, PLEASE DESCRIBE THE INCIDENT, WHEN IT OCCURRED, WHEN YOU FILED THE COMPLAINT, AND THE STATUS OF THE COMPLAINT.

WHO DID YOU FILE YOUR PREVIOUS COMPLAINT WITH?

MARTA Diversity & Inclusion EEOC Other _____

DO YOU HAVE A REPRESENTATIVE? (Circle one) Yes No IF SO, PLEASE PROVIDE YOUR REPRESENTATIVE'S NAME AND CONTACT INFORMATION.

IS YOUR REPRESENTATIVE AN ATTORNEY? (Circle one) Yes No

AFFIRMATION

I affirm that I have read the above charge and that it is true and correct to the best of my knowledge, information and belief. I am willing to fully cooperate in the D&I investigative process and provide whatever evidence/documents which may be requested of me.

COMPLAINT OF DISCRIMINATION



OFFICE OF DIVERSITY & INCLUSION

Also, I acknowledge my obligation to immediately notify the Office of Diversity and Inclusion of any changes relative to my contact information (e.g. address, telephone numbers, e-mail address) during the investigative period.

Signature

Date

NOTICE CONCERNING YOUR RIGHTS TO FILE A COMPLAINT WITH A CIVIL RIGHTS ENFORCEMENT AGENCY

Any employee or applicant for employment who believes he or she has experienced discrimination has a right to file a formal complaint with a federal civil rights enforcement agency. *A person does not give up this right when he or she files a complaint with the Metropolitan Atlanta Rapid Transit Authority (MARTA).*

The following federal agency enforces laws against discrimination:

U. S. Equal Employment Opportunity Commission (EEOC)
Sam Nunn Atlanta Federal Center
100 Alabama Street, SW, Suite 4R30
Atlanta, Georgia 30303
Phone: 1-800-669-4000
Fax: 1-800-669-6820

STATUTORY TIME PERIODS FOR THE TIMELY FILING OF CHARGES OF DISCRIMINATION (MEASURE FROM THE OCCURRENCE OF A DISCRIMINATORY ACTION):

1. Complaint must be filed within 180 days of the matter alleged to be discriminatory.
2. MARTA Investigator has 90 days to complete the investigation and respond to all parties regarding the findings.

COMPLAINT OF DISCRIMINATION



OFFICE OF DIVERSITY & INCLUSION

AFFIRMATION

I affirm that I have read the above notice concerning my rights to file a complaint with a federal, state, or local civil rights enforcement agency at any time before or after I file a complaint with MARTA Office Diversity and Inclusion, and that I am aware of the filing deadlines for those agencies.

Signature

Date

(Please provide a copy of this form to the Complainant)

**OFFICE OF DIVERSITY AND INCLUSION
COMPLAINT PROCESSING STANDARD OPERATING PROCEDURES**

COMPLAINT PROCESSING STANDARD OPERATING PROCEDURES	
Complaint Assignment	The Manager of Diversity & Inclusion (D&I) or his/her designee, will assign D&I personnel to each complaint received by D&I, whether formal or informal.
Informal Complaint Process	<p>Informal EEO Counseling Process - There is no required prerequisite process to filing a formal complaint of discrimination with the Authority. The process is initiated when an aggrieved party contacts D&I personnel and alleges instances of unlawful discrimination but requests informal inquiry into their concerns prior to filing a formal written complaint. The purpose of informal inquiry is to afford both the aggrieved person and the Authority an opportunity to achieve an informal and amicable resolution of the matter through alternative dispute resolution, while avoiding the necessity of formal complaint processing.</p> <p>A D&I representative will meet with the aggrieved employee. They will discuss in detail the allegations and the D&I representative will advise the aggrieved person of his/her rights to file a complaint and the bases and issues covered under the purview of the relevant laws. The D&I representative will also provide the complainant with a "Notice of Right to File Formal Complaint" (D&I CF-4).</p> <p>The D&I representative will also describe the informal conflict resolution techniques that are offered as a means of attempting to resolve the issue at hand at the lowest level possible (i.e. mediation or facilitation), to achieve an early resolution. The D&I representative will also explain the time frames within which the issue should be resolved, formally or informally, in accordance with the complaint resolution procedure. The D&I representative will then explain to the aggrieved employee that participation in any of the processes is completely voluntary and that the process cannot be successful if all parties are not willingly participating. The D&I representative will explain the perceived advantages and possible disadvantages of utilizing one technique versus another to resolve their issue.</p> <p>Efforts will be made to implement solutions that not only address the problem(s) at hand effectively but eliminate the possibility of similar ones occurring in the future. If the informal procedure fails to resolve the matter to the satisfaction of both complainant and respondent, the former may file a formal complaint of discrimination with D&I.</p> <p>The EEO Investigator shall not attempt to exert any influence on a Complainant's decision to pursue resolution by filing a formal complaint. Additionally, a Complainant may elect to file a formal complaint after the initial intake with the EEO Investigator instead of pursuing alternative dispute resolution.</p>

	<p>During the informal D&I resolution process, the primary focus of counseling, mediation, conciliation or facilitation, is on informal resolution of EEO concerns. In this regard, all individuals involved in the dispute should assist the EEO Investigator in efforts to reach a mutually acceptable solution to the problem by considering all possible alternatives. <u>Whenever possible, the EEO Investigator should complete the informal counseling process within 15 work days of the initial intake interview.</u> The EEO Investigator shall hold a final interview with the aggrieved party to discuss any resolution(s) achieved. These informal resolution options remain available to the parties throughout the intake and investigative phases as long as both are willing to participate.</p> <p>In the event that informal resolution is not selected, successful, or cannot be facilitated, the informal complaint will escalate to the analysis phase. The EEO Investigator will analyze the information gathered during the intake process, then discuss the information gathered with the Manger and/or Executive Director, Diversity & Inclusion to determine if the allegations will be accepted for further investigation. Upon confirmation that the informal complaint will be escalated to the formal complaint stage, the assigned EEO Investigator will begin the investigative process. The investigation may take the form of examination of records and interviews with employees, supervisors or management officials. To be effective in attempts to resolve problems before, or after, they reach the formal complaint stage, the cooperation of MARTA employees at all levels is essential and mandatory.</p> <p><u>Any MARTA employee that refuses to cooperate during any phase of a D&I investigation may be subjected to disciplinary action up to and including termination.</u></p>
Formal Complaint Process	<p>Except as indicated below, the Executive Director or his/her designee is responsible for accepting complaints for formal processing.</p> <p>Complaints filed by or against Board Direct Reports will be accepted by the D&I department and will be referred to an external source for investigation.</p> <p>The Executive Director and/or the Manager of Diversity and Inclusion will review the signed complaint of discrimination and determine whether the requisite conditions specified below are met. If all the specified conditions are met, the formal complaint must be accepted. A complaint may be fully accepted (when all of the allegations meet the specified conditions) or it may be partially accepted (where some allegations meet the specified conditions and others fail to meet one or more of the conditions).</p> <p>Where all allegations are found to be within the guidelines for acceptance of formal complaints, the Manager of Diversity & Inclusion shall assign the complaint to a specified EEO Investigator. For recordkeeping purposes, the date the signed complaint was originally submitted shall be considered the "Filing Date". The appointed EEO Investigator will then notify the Complainant of the complaint's acceptance via D&I CF-7, the Respondent via D&I CF-4A, and the head individual in the office where the alleged discrimination took place via D&I CF-9 to inform him/her of the investigation. These notices should be dispatched within 7 working days of the complaint's acceptance. When notifying management officials of active</p>

investigations via **D&I CF-9** it is **not** necessary to include the parties' names, a case number is sufficient. This will help maintain confidentiality until a determination is made on the case by the Executive Director, D&I.

Where all allegations are believed to be unacceptable, or do not fall within the purview of Title VII, the Executive Director shall notify the complainant, in writing, that his/her claim is dismissed with no further processing by D&I via **D&I CF-7B**. D&I will also detail whether the complaint is being referred to Employment Relations and Development or another MARTA office via **D&I CF-10**.

Where a complaint is partially acceptable, the Executive Director of D&I, shall so notify the complainant in writing, specifying the allegations that are acceptable and those that are not (**D&I CF-7A**).

In the notification to the Complainant and Respondent of the total or partial acceptance of a complaint, the Executive Director will specify the precise allegation(s) that have been accepted and the basis of the allegation(s); i.e., race, color, sex, (including sexual harassment, pregnancy, and sexual orientation), age (40 and over), religion, national origin, veteran status, marital status, parental status, family medical history or genetic information, disability, or retaliation in connection with the Complainant's involvement in a previous discrimination complaint or opposition to perceived discriminatory behavior. The Executive Director will ensure that only allegations accepted for processing will be investigated.

Requisite Conditions for Formal Complaint Acceptance

The following requisite conditions must be met before a complaint may be accepted for formal processing, in its entirety or in part:

Timeliness. To be timely, the Complainant must have contacted D&I personnel within 180 calendar days of the alleged discriminatory act or 180 days from the date the complainant became aware of an unlawful act. The last day of the period (180 days), is to be included unless it is a Saturday, a Sunday, or a legal holiday in which event the period runs until the end of the first workday following the weekend or legal holiday.

Purview. To fall within the purview of D&I's EEO regulations, the complaint must be filed by an employee, former employee, or applicant for employment with MARTA, a MARTA contractor or subcontractor, and must be made in connection with an employment matter over which MARTA has jurisdiction. The alleged discriminatory act must be based upon at least one of the complainant's protected classes. These include race, color, sex, (including sexual harassment, pregnancy, and sexual orientation), age (40 and over), religion, national origin, veteran status, marital status, parental status, family medical history or genetic information, disability, or retaliation. Retaliation refers to a discriminatory act or adverse personnel action that occurred in connection with the complainant's involvement in a previous discrimination complaint or in opposition to perceived discriminatory behavior. Also, there must be a causal connection between the alleged discriminatory act or personnel action and the complainant's protected class(es).

	<p>Specificity. To be acceptable as a formal complaint, the issues must be sufficiently defined so that they may be investigated. If vague or general allegations are listed on the complaint form, the Complainant will receive a “<i>Clarification of Allegation and Issues</i>” letter, (D&I CF-6A).</p> <p>Identical Issues. To be acceptable as a formal complaint, the issues presented must not be identical to those contained in a previous complainant filed by the same complainant, which is pending in the Authority or which has been decided on by the Authority.</p> <p>When the Executive Director provides the complainant an opportunity to clarify the allegations, the complainant will be informed, in writing, that failure to respond within 7 calendar days will likely result in the dismissal of the complaint. The complainant’s response should be in writing and will be made a part of the complaint file. Any changes will be recorded in an amended complaint.</p>
Consolidation of Complaints	<p>Two or more individual complaints of discrimination filed by different employees or applicants, consisting of substantially similar allegations of discrimination may be consolidated for purposes of investigation. However, separate Authority decisions will be submitted for each individual complaint.</p> <p>The Manager of Diversity & Inclusion may at his or her discretion, join for processing multiple individual complaints of discrimination by the same employee or applicant. A notification will be submitted in writing to the complaining party (D&I CF-8).</p>
Complaint Withdrawal	<p>The complainant may withdraw his or her complaint during any stage of the process. The Manager of Diversity & Inclusion, in consultation with the Executive Director, will ensure that the intent to withdraw is clearly expressed as evidenced by a statement with the complainant’s signature on the complaint withdrawal form (D&I CF-7C). They will also ensure that there is no evidence of coercion or intimidation influencing the Complainant’s decision. It is desirable that the statement indicate reasons for withdrawal. The original withdrawal statement should be made a part of the complaint file.</p> <p><u>Withdrawal of a complaint by the Complainant will formally end the investigative process. However, if the Executive Director has reasonable cause to believe an unlawful employment practice has occurred, he or she may file an Executive Director initiated complaint.</u></p>
Executive Director Initiated Complaints	<p>Purpose. Executive Director-initiated complaints are filed to ensure that possible instances of unlawful discriminatory practices are addressed, investigated, and remedied.</p> <p>Process.</p> <ol style="list-style-type: none"> I. Executive Director initiated complaints can be filed in three instances: <ol style="list-style-type: none"> 1. These complaints can be filed in lieu of the withdrawal of a formal complaint of discrimination by a Complainant, when the Executive Director, D&I has reasonable cause to believe that an unlawful discriminatory practice has occurred based on the information obtained during the intake process and/or investigation. 2. Upon receiving pertinent information from an aggrieved party, witness, whistleblower, or management official about a possible unlawful discriminatory act, when the Complainant does not wish to file a Complaint on their own behalf.

	<ol style="list-style-type: none"> 3. When, during the course of their duties or a formal investigation, an EEO Investigator and/or Manager, D&I become aware of possibly discriminatory behavior from witnesses, evidence, or other credible information. This can include credible information from individuals who wish to remain anonymous as a condition of sharing their knowledge of events. II. The administrative process for Executive Director initiated complaints will follow the same administrative process and procedures as a complaint submitted by an aggrieved party. For administrative purposes the MARTA Office of Diversity & Inclusion will be named as the Complainant, and an assigned EEO Investigator will lead the investigation. MARTA employees will also be subject to the same requirements and expectations as they pertain to participation and cooperation with the investigation. <ol style="list-style-type: none"> 1. In that event that the aggrieved party expresses in writing that they do not wish to participate in the investigation as a witness, the EEO Investigator will notate same in the file and collect all other pertinent information. D&I staff should not place undue pressure on the aggrieved party to participate.
<p>Dismissal of Complaints</p>	<p>Purpose. The Executive Director of Diversity and Inclusion has the authority to dismiss a complaint. Complaints that fail to meet the requisite conditions set forth under the “Requisite Conditions for Complaint Acceptance” will be formally dismissed. Where only a part of the complaint is dismissed, the remainder of the complaint will be processed. Similarly, when Complainants fail to comply or respond to D&I staff after several documented attempts to reach them, the complaint will be dismissed. Dismissed complaints that did not clear the acceptance threshold will still be recorded as “Formal Complaints” for recordkeeping purposes.</p> <p>Dismissal Process. Within 7 days of conducting an intake interview with the Complainant the EEO Investigator will analyze the contents of the information provided, then present their initial analysis to the Manager of Diversity & Inclusion; along with their recommendation of whether a formal complaint should be filed; or if the complaint should be dismissed or referred. If the Manager, D&I concludes the complaint should be dismissed, the EEO Investigator who conducted the intake shall prepare a Notice of Dismissal of Complaint (D&I CF-7B), and then dispatch same to the Complainant. The Executive Director, D&I is to be copied on this notice. The Manager, D&I may consult with the Executive Director concerning a complaint dismissal to clarify whether a complaint meets the “Requisite Conditions” threshold.</p> <p>In the event that the EEO Investigator is unable to obtain the full cooperation of the Complainant during an investigation, the EEO Investigator will forward a closeout letter, via email and certified mail, informing the complainant of the intent to close the informal investigation in 7 calendar days (form D&I CF-9B), unless the complainant notifies D&I and indicates a desire to continue the investigation. The Investigator shall copy the Manager and Executive Director, Diversity & Inclusion on the dismissal correspondence.</p>
<p>Referral of Complaints</p>	<p>Purpose. The Executive Director of Diversity and Inclusion has the authority to refer complaints upon their dismissal from D&I. Complaints that fail to meet the “Requisite Conditions for Complaint Acceptance” but contain what D&I staff believe to be possible violations of MARTA’s Policies and Procedures will be referred to the appropriate MARTA office.</p> <p>Referral Process. Prior to dismissing a complaint filed with D&I that may need a referral, the EEO Investigator will submit a draft Referral Notice (D&I CF-10) to the Executive Director of D&I, through the Manager, D&I. This draft notice will contain the proposed MARTA office that will receive the referral. Upon receiving approval from the Executive</p>

	<p>Director, D&I, the Investigator will send the notice to the designated MARTA office. The Investigator must also notify the Complainant of where the complaint was referred in the Notice of Dismissal of Complaint (D&I CF-7B).</p> <p>The Investigator should make themselves available for requests for information from the office receiving the complaint(s). All formal requests for intake information by these prospective offices should be cleared with the Executive Director.</p> <p>Referred inquiries from other MARTA departments such as Employee Relations, Customer Service, or the MARTA Police will be reviewed and undergo the normal D&I intake process. Should the particulars of the complaint not meet the Requisite Conditions outlined by D&I, the Manager and/or Executive Director, D&I will refer the complaint to the appropriate department or dismiss it accordingly.</p>
False Charges	<p>Once a complaint of sexual harassment and/or discrimination has been made, MARTA has an obligation to investigate the matter. Any complaint determined to be intentionally dishonest, or made maliciously without regard for the truth, shall subject such complainant to disciplinary action up to and including termination. The determination as to whether a complaint constitutes a false charge under this section shall be made as part of the complaint resolution process set forth in these procedures.</p>
Priority of Investigations	<p>The general practice is that complaints are handled in the order in which they are received. However, all incoming complaints should be examined to determine if the alleged discrimination demands more prompt remedial action (if any). If such a determination is made, the complaint should be given priority status.</p>
Administering Investigations	<p>Purpose. The purpose of an investigation is (1) to gather facts to determine whether the Respondent may have acted unlawfully and/or in violation of MARTA policy, and (2) if so, to have sufficient factual basis on which to recommend an appropriate remedy.</p> <p>The scope of the investigation is limited to the immediate issues of the complaint, although it may be expanded to include other potential issues that are uncovered during the investigation or matters which are "like or related to" the issues under investigation.</p> <p>The Diversity & Inclusion office will make a good faith effort to complete investigations within 90 days.</p> <p>The Manager of Diversity & Inclusion authorizes the person conducting investigations to:</p> <ul style="list-style-type: none"> • Investigate all aspects of complaints of discrimination; • Notify all employees that they are required to cooperate with the investigator during the course of the investigation; and request employees of the Authority having knowledge of the matter to furnish statements, without the promise of confidentiality. • Submit requests, in writing, for any relevant and necessary documentation to Human Resources or any other MARTA department.

D&I investigations are typically performed by D&I personnel trained or experienced in investigating complaints of discrimination. Duties of the investigator include:

Impartiality. The investigator must be thorough, unbiased and objective. The investigator must be neutral in his/her approach to collecting facts. The investigator is not an advocate for any of the parties or interests and should refrain from developing allegiances to them.

Analyzing the Allegations. The investigator receives a copy of the complaint filed by the complainant, to familiarize himself/herself with the environment out of which the complaint arose, and to prepare, when appropriate, a written investigative plan for submission to the Executive Director, D&I and/or Manager, D&I. This plan outlines the strategies which the investigator plans to use to uncover the relevant documentation necessary to facilitate an adjustment of or to make an informed decision on the complaint.

While analyzing the formal complaint, the investigator should also reference D&I case files to determine whether the alleged Respondent was previously found to have violated MARTA's D&I policies. If so, the investigator should make note of that fact and include it in their investigative plan. This information will also be relevant should the complaint be referred to another MARTA office.

Contacting Appropriate Persons. Upon acceptance of the formal complaint, the EEO Investigator contacts the alleged Respondent and the head individual in the office where the alleged discrimination took place to inform him/her of the investigation (**D&I CF-4A** and **CF-9**); if this individual is the Respondent the notification should go to whom they report. The Respondent is required to submit a formal response to the allegations within **five (5) working days** of receipt of the notice or schedule a meeting with the investigator to discuss the allegations and provide a position statement.

The EEO Investigator **shall** issue the Statement of Confidentiality form (**D&I CF-1B**) to the Complainant, Respondent, and **all** relevant witnesses interviewed during the course of the investigation. These forms must be signed by the respective individuals and included in the complaint/investigative file. A copy may be provided to the individuals for their records.

Notifying Witnesses. The EEO Investigator will notify potential witnesses and/or persons with knowledge of relevant facts of the date and time to appear for an interview.

Conducting the Investigation. The EEO Investigator will interview witnesses to explore the allegations made by Complainant and Respondent. Subsequent to each interview, a written summary is prepared and made part of the investigative file. Relevant files and records will also be gathered from the appropriate departments as evidence.

Following the completion of all relevant interviews and analysis, the EEO Investigator will prepare a **Report of Findings** to be submitted to the Executive Director, through the Manager of Diversity & Inclusion.

	<p>Concluding Investigations. The Executive Director, D&I or Manager, D&I will meet with both Complainant and Respondent in separate close-out conferences to inform them of the findings of the investigation, whether or not there was sufficient evidence to support the allegation, whether corrective action is forthcoming, and their right to file with the external entities. If necessary, to implement corrective action, D&I will communicate during the close-out meeting that the AGM or Director of the affected department will provide written notification to the Executive Director, D&I that the recommended corrective action has been taken.</p> <p>Afterwards, the Executive Director, D&I will inform the appropriate members of senior staff of the investigation's outcome and discuss recommendation for corrective action.</p> <p>If no further investigation is needed, the Executive Director, D&I will issue a Letter of Determination (D&I CF-13) on the case. This determination will specify a “cause” or “no cause” finding and will serve to close the case, while also recommending appropriate corrective action. The determination letter may be drafted by the EEO Investigator, Manager, or Executive Director, D&I for review. However, the final version <u>must be reviewed and approved by the Executive Director, D&I.</u></p> <p>The Executive Director, D&I will dispatch the Complainant and Respondent a copy of this determination omitting reference to corrective actions which do not pertain to the Complainant. The Executive Director will also forward a copy of the determination to the Director of the Department where the alleged discrimination took place and, if so directed, the Legal Services department. Additionally, the Executive Director or Manager, D&I will schedule separate closeout meetings with the Complainant, Respondent, and management to discuss the conclusion of the investigation.</p> <p>Whether corrective action is implemented or not, the Respondent and the appropriate management officials will be instructed not to engage in any form of retaliation. The Executive Director, D&I shall include in the letter of determination a directive to forward to the Human Resources Department a copy of the memorandum and/or other record for which corrective action is documented. This shall be included in the confidential section of the affected employee's personnel file.</p>
Corrective Action	<p>Recommendation of Corrective Action. If the evidence gathered during the investigation supports the conclusion that a violation of Title VII and/or MARTA's Equal Employment policies occurred, then corrective action will be warranted. The EEO Investigator and/or Manager, D&I may make a recommendation regarding the form of progressive discipline. However, the final recommendation will be issued by the Executive Director of D&I.</p>
Complaint Processing Contingencies	<p>Purpose. The purpose of complaint processing contingency procedures is to ensure the integrity of the D&I EEO processes, and the rights of MARTA employees in special circumstances.</p> <p>I. For Complainants:</p> <p>a. Former employees: Prospective Complainants who are no longer employed with the company as a result of voluntary resignation (constructive discharge), termination, or retirement have a right to file an EEO complaint with D&I. Their complaint will be subject to the same Requisite Conditions for Formal Complaint Acceptance applied to complaints from current MARTA employees.</p>

	<p>II. For Respondents:</p> <p>a. Former employees: Individuals identified as the Respondent in a D&I EEO complaint who are no longer employed with the company may be still bound to the complaint, depending on the terms of their separation from MARTA and the standing of the complaint.</p> <p>i. Voluntary Resignation:</p> <ol style="list-style-type: none"> 1. Employees who voluntarily resign from MARTA may still be subject to notice of the complaint, and corrective action (if cause is established) if they did so within 180 days of the alleged act of discrimination. The assigned EEO Investigator will also seek to establish whether the resignation was in connection to the allegations made in the complaint. 2. Employees who attempt to voluntarily resign after being named in an accepted D&I complaint may be deemed recalcitrant or an obstruction to the completion of the investigation if it is determined they attempted to do so as a result of the alleged discriminatory act, or complaint. They are still subject to the MARTA D&I process until the completion of the investigation. The EEO Investigator will note this occurrence in the investigative file and seek to establish whether the attempted resignation was in connection with the complaint. <p>ii. Scheduled Retirement:</p> <ol style="list-style-type: none"> 1. Employees whose scheduled retirement goes/went into effect within 180 days of an alleged act of discrimination are still subject to the complaint's allegations unless otherwise released by the Executive Director, D&I. 2. Employees whose scheduled retirement date goes/went into effect after a complaint has been accepted by the Executive Director, D&I or after a cause determination has been issued are still subject to corrective action. This action may include, but is not limited to, a hiring prohibition with MARTA and its affiliates. <p>iii. Expedited Retirement:</p> <ol style="list-style-type: none"> 1. Employees who attempt to expedite their retirement after being named in an accepted D&I EEO complaint may be deemed recalcitrant or an obstruction to the completion of the investigation if it is determined they attempted to do so as a result of the alleged discriminatory act, or the complaint. They are still subject to the MARTA D&I process until the completion of the investigation. The EEO Investigator will note this occurrence in the investigative file and seek to establish whether the attempted resignation was in connection with the complaint.
<p>Disclosure of Investigative Material</p>	<p>Disclosure Protocol.</p> <ol style="list-style-type: none"> I. The Executive Director of D&I will only furnish copies of information contained in the investigative file if legally required to do so.

- a. Discrimination complaint files containing correspondence and investigatory material on EEO complaints are retrieved by either the name of the Complainant or the Complaint File Number only, and the Complainants are the only subjects of the files.
 - b. Any request for information from the investigative file should be made through the MARTA open records process with MARTA's Legal Services department.
 - c. If a Complainant, Witness or Respondent request to see any portion of the D&I file, whether he/she makes the request during the D&I process or after a final decision on the complaint, D&I office need not respond to the request except to indicate that the request has been referred to MARTA's Legal Services department.
- II. At any stage during complaint processing process (informal counseling or investigative stage), designated D&I staff may inform a Complainant, Witness or Respondent who is currently an employee of MARTA about the complaint only to the extent necessary to obtain information from them as a witness. The designated D&I staff include the Executive Director and Manager, D&I, or EEO Investigators. Likewise, at any stage of the process, designated D&I staff may show such a Complainant, Witness or Respondent documents that are from the investigative file or are pertinent to the complaint only to the extent necessary to obtain from the respective party information needed for the complaint process.
- III. When showing documents to a Complainant, Witness or Respondent, designated D&I staff may delete/redact information identifying individuals. In making determinations whether to delete/redact information and, if so, what information to delete, designated D&I staff should consider both the individuals' privacies and the extent to which deletion/redaction would diminish the Complainant, Witness or Respondent's ability to provide information needed for the D&I process.
- a. Following issuance of a final decision on the discrimination complaint, the Complainant, Witness or Respondent has a right of access to portions of the EEO file only if, because of a final agency decision, an adverse or disciplinary action is proposed by his/her supervisor or manager. In addition, the individual (and now subject of a proposed adverse action) may have a right of discovery to the extent allowed by routine use in the Marta open records process. MARTA's Legal Services department will determine whether discovery is warranted.
 - b. Other requesters, such as the public or the media, may request access to EEO files. Any request should be referred to MARTA's Legal Services department, which will determine how to respond.
- IV. Requests by a Complainant, Witness or Respondent for information pertaining to a case or complaint being managed by the EEOC shall be directed to the Marta's Legal Services department and/or the Atlanta Regional Office, in accordance with EEOC's Privacy Act requirements (29 CFR § 1611), and FOIA requirements (5 U.S.C. § 552).

Federal Recordkeeping Compliance

The D&I staff will maintain compliance with all applicable federal recordkeeping requirements. This will be achieved by adhering to the Code of Federal Regulations sections that correspond to the applicable statutes. These statutes include, but are not limited to:

<u>Statute</u>	<u>Recordkeeping Regulation</u>
Title VII of the Civil Rights Act of 1964	(29 CFR 1602.14)
Age Discrimination in Employment Act of 1967	(29 CFR 1626.3)
Americans with Disability Act of 2008, as amended	(29 CFR 1602.14)
Genetic Information Non-Disclosure Act of 2008	(29 CFR 1602.14)
Equal Pay Act of 1963	(29 CFR 1620.32 and 29 CFR 516.1)
Section 504 of the Rehabilitation Act of 1973	(41 CFR 60-741.52)
Executive Order 11246 of 1965	(41 CFR 60-1.7)

Contents of a
Complaint File:

Informal Complaint File. Upon receiving a completed informal complaint, the investigator should immediately create a physical and digital file to keep track of documents related to the complaint. They should also prepare a digital activity sheet to log developments pertaining to the complaint.

If the Executive Director of Diversity and Inclusion chooses not to accept a complaint, the Investigator will place a copy of the complaint in the respective physical and digital folders, along with the Notice of Dismissal sent to the complainant. Afterwards, the hard copies of the complaint, Notice of Dismissal, interview notes, email correspondence pertaining to the case, and all other relevant documents should be gathered and placed in the physical complaint file.

Complaints that have been referred out of the Office of Diversity and Inclusion should be placed in a "Referred Complaints" section of the file room when archived.

Formal Complaint File. Upon acceptance of a formal complaint, the assigned Investigator should immediately create a physical complaint file to accompany the digital file. The EEO Investigator establishes and maintains the complaint file which contains:

- The formal, written complaint signed by the complainant (D&I CF-1);
- Complaint Activity Sheet;
- Advisement of "Notice of Right to File Formal Complaint" (D&I CF-4);
- Any documents submitted by the complainant or the respondent in support of allegation(s) in the complaint;

- A written statement signed by the complainant designating a representative (whenever such a designation is made or modified) and the representative's address and telephone number (D&I CF-5)
- All pertinent official correspondence from D&I, and any other MARTA offices

Organizing the Investigative File. Upon completion of the investigation, the assigned EEO Investigator will prepare the investigative file for review. All materials gathered and generated during the investigation should be included in this file and uploaded to LaborSoft. This includes but is not limited to:

- A case file index at the front of the case file, created at the conclusion of the investigation. D&I staff should reference the Case File Index Template for guidance prior to closure of an investigative file.
- A Determination Letter prepared and signed by the Executive Director, which finalizes the findings by D&I and includes any recommended corrective action.
- A Report of Findings prepared by the investigator pursuant to directions from the Manager of Diversity and Inclusion.
- Interviews and statements of the Complainant, Respondent, and of any witnesses.
- Any documentation, statistical information, or other evidence acquired or generated by the investigation organized to show its relevance to the allegation(s) of the complainant and/or the environment from which the complaint arose.
- If the complaint is withdrawn, a written statement from the complainant or the representative to that effect, signed by the complainant.
- If there is a resolution of the complaint, the terms of the resolution must be in writing and signed by the complainant and the appropriate MARTA officials.

Case Tracking and Management

D&I staff will maintain accurate and accessible logs of all complaints and cases. This includes formal, informal, dismissed, referred and closed cases. These logs should be held digitally on the office's appropriate O: Drive folder, or LaborSoft system. EEO Investigators should take care to ensure that the information in the logs is up to date.

Right to File with External Agencies

The Executive Director of D&I and/or D&I Officer's determination letter will constitute the final internal decision and formally communicate the official findings in the discrimination complaint matter. Aggrieved parties have the right, at any time (within the statute of limitations) before and during the process, to file a complaint with external agencies.

The Complainant may file with the following agencies:

U.S. Equal Employment Opportunity Commission
100 Alabama Street Southwest, Suite 4R30
Atlanta, Georgia 30303
Phone: 1-800-669-4000
ASL Video Phone: 844-234-5122

Federal Transit Administration
Office of Civil Rights
Attention: Complaint Team
East Building, 5th Floor – TCR
1200 New Jersey Avenue, SE
Washington, DC 20590

External Complaint Procedure (EEOC Charges Filed Against MARTA)

Notice of Complaint

- i. Complaint received by MARTA staff
- ii. Receiving party immediately forwards complaint to Legal Department



Complaint Received by Legal

- i. Legal forwards copy of notification to D&I
- ii. Legal opens complaint file
- iii. Legal notes required time limitations, if necessary



Case Investigation

- i. Legal gathers appropriate information or documentation
- ii. Legal speaks to individuals with relevant information
- iii. Legal responds to requests made by EEOC (if required)



Closing of File

- i. Legal follows case until resolution is obtained
- ii. Legal notifies appropriate parties of case completion
- iii. Legal forwards copy of closing documents to D&I
- iv. Legal closes file

EXTERNAL COMPLAINT PROCEDURE (Complaints filed with EEOC)

1. MARTA receives notification from the EEOC that a formal charge has been filed against the Authority
2. If the Notification was not received by the Legal department, the notification is immediately forwarded to MARTA's Legal Department
3. Upon receipt of notification by the MARTA Legal Department, MARTA's D&I Department is forwarded a copy of the notification.
4. MARTA's Legal Department opens a file and notes time requirements for responses, if required (e.g. position statements, mediation, etc.)
5. MARTA's Legal Department notifies the appropriate department head of alleged allegations, if necessary.
6. MARTA's Legal Department takes lead in gathering all information necessary to respond to EEOC requests.
7. MARTA's Legal Department drafts Agency position statement, memos accepting mediation, or other required responses.
8. MARTA's Legal Department follows case until EEOC forwards closing documentation for the claim filed.
9. MARTA's Legal Department notifies appropriate parties of the case resolution and closes file.
10. MARTA's Legal Department sends closing documentation to the D&I Department.

Formal EEO Internal Complaint Procedure

Notice of Complaint

- Complainant requests to see EEO Investigator
- EEO Investigator schedules meeting
- During consultation, Complainant is informed of their rights and issued a Formal Complaint form.
- Respondent is provided consultation and informed of their rights regarding a complaint.

Intake of Complaint

- Upon receipt of complaint, EEO Investigator opens a file, completes activity log, and meets with Manager and/or Executive Director, D&I
- Executive Director, D&I issues acceptance/rejection letter and other notifications
- Complaint is formally assigned to an investigator, and investigative plan developed

Investigation of Complaint

- Fact finding activities initiated
- Witnesses interviewed
- Complainant given opportunity to rebut witness statements
- Report of findings submitted for approval

Closing of Complaint

- Closeout conference with Complainant
- Closeout conference with Respondent
- D&I and Legal attends close-out conference with Sr. Management
- Determination letter sent to parties

If Settlement Required

Legal will draw up all Settlement documents and forward them to the EEO Investigator for distribution to the relevant parties

Remedial Action

If required, Remedial Action form(s) (CF-11) are disseminated at closeout

Upon receipt of Remedial Action form, EEO file will be closed

Additional Action

If new evidence submitted at closeout conference, additional fact finding may be initiated.

FORMAL INTERNAL COMPLAINT PROCEDURE

1. Complainant makes a request to speak with the EEO Investigator.
2. The EEO Investigator contacts Complainant and schedules a meeting time.
3. The EEO Investigator meets with Complainant, answers questions, and takes notes as appropriate.
4. The EEO Investigator informs Complainant of right to file formal complaint and statute of limitation for filing a complaint. EEO Investigator obtains a signature from Complainant that they have been advised of their rights to file. Mediation and Facilitation is offered as forms of resolution.
5. Complainant is given a Formal Discrimination Complaint Form **(D&I CF-1A)**.
6. Upon receipt of the completed Complaint Form, (which has been properly signed by the Complainant), the EEO Investigator opens a file, begins an activity log and meets with Executive Director, D&I to discuss allegations found in the complaint. **Allegations of Sexual Harassment are given top priority for investigative purposes.**
7. The Executive Director, D&I reviews the file and assigns an investigator. If the complaint is accepted for investigation, the EEO Investigator discusses an investigation action plan with the Executive Director.
8. Formal notification of the investigation is issued to the Complainant, Respondent, and relevant management figures.
9. The EEO Investigator gathers documents, speaks with witness and performs analysis, as needed. The EEO Investigator reduces their notes to writing. At all times, the EEO Investigator shall keep the Executive Director, D&I informed on development of the investigations.
10. The EEO Investigator submits a Report of Findings to Executive Director.
11. Upon approval by Executive Director, D&I, Report of Findings is forwarded to MARTA's Legal Department for review.
12. A closeout conference is scheduled with Complainant.
13. If it is determined that there is no need for additional inquiry, close-out meetings are scheduled with Respondent and Sr. Management.
14. If there is corrective action needed, the Executive Director, D&I will discuss these recommendations during the close-out meetings. Relevant Management staff will be responsible for ensuring that D&I is informed that the corrective actions and/or recommendation actions are completed.
15. A Determination Letter is sent to the Complainant and Respondent.
16. Once the Remedial Action information is received, the file is closed by the Office of Diversity and Inclusion.

INTERNAL MONITORING AND REPORTING SYSTEM

The Executive Director of Diversity and Equal Opportunity (D&I) has implemented an internal audit and reporting system to measure the effectiveness of MARTA's Equal Employment Opportunity/Affirmative Action Program. The system identifies areas where remedial action is needed and indicates the degree to which goals and objectives have been attained. The audit system provides for maintenance and/or regular review of the following reports:

- applicant flow by EEO occupational categories (when applicable), disability, gender and minority group identification;
- discrimination complaint logs for internal and external charges;
- EEO occupational categories for sex and race identification;
- data regarding hires, promotions, resignations, terminations, transfers, discipline, corrective actions, layoffs, compensation, training, test administration, and apprenticeships.

Report data will depict EEO occupational categories, gender, and race.

The auditing system will include quarterly reporting of efforts and progress in achieving goals. The Executive Director, D&I will review and analyze the data, report the overall status of the Affirmative Action Program, and make recommendations for corrective action to the General Manager/CEO and other management executives. The Executive Director, D&I will:

- discuss challenges relating to the implementation of the EEO/AA Program with the General Manager/CEO and senior management personnel;
- inform the General Manager/CEO of charges of discrimination;
- investigate all charges of discrimination and submit appropriate responses and determinations on behalf of the Authority;
- serve as a liaison between the Authority and enforcement agencies;
- audit the full selection and placement process, including new hires, promotions, terminations, and transfer patterns, and;
- report the status of the EEO/AA Program on a semi-annual basis to the Board of Directors.

Monitoring Procedures

On an annual basis, the Executive Director, D&I will evaluate and report MARTA's progress in meeting EEO/AA goals. Progress will be measured through audits of specific employment practices and procedures (i.e. job description development and job offers), along with review and analysis of employment data. A Workforce Utilization Analysis, by department and individual EEO job categories, will be conducted to determine areas of concentration and/or under representation of minorities and females. Various lines of progression will be identified and monitored to ensure advancement of minorities and females, in accordance with their underutilization. Necessary adjustments in recruiting efforts will be made to correct potential deficiencies.

On a triennial basis, the Executive Director, D&I will prepare a utilization analysis and establish goals for all job groups showing underutilization. This activity is integrated into the development of an updated affirmative action plan to be submitted for FTA approval.

Index of MARTA Office of Diversity & Inclusion Control Forms

Control Form Number	Form Name	Last Updated
CF-1A	EEO Discrimination Complaint Form	4/2019
CF-1B	Statement of Confidentiality	
CF-2	DEO Customer Complaint	
CF-3	Memo to HR for Request for Records	
CF-4	Notice of Right to File a Complaint	
CF-5	Designation of Representative	
CF-6	Response to Informal Inquiry	
CF-6A	Clarification of Allegations and/or Issues of Complaint	
CF-7	Notice of Acceptance	
CF-7A	Partial Acceptance of Discrimination Complaint	
CF-7B	Notice of Dismissal	
CF-7C	Consolidation of EEO Complaints	
CF-8	Notice of Filing to Respondent	
CF-9	Notice of Investigation to Management	
CF-10	Referral Notice	
CF-15	Complaint of Violence	

This Standard Operating Procedure has been reviewed by the management staff of the **MARTA Office of Diversity & Inclusion** and has been implemented accordingly.

Adoraeu Jouett
Manager, Office of Diversity & Inclusion

Paula Nash
Executive Director, Office of Diversity & Inclusion

Date

Date

EXHIBIT 14

Workforce Utilization Analysis by Job Category

Utilization Analysis by Job Category

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V
1 Job Category	Salary Range (\$XX,000-XX,000)		Total Workforce					Male										Female				
2 Use EEO-4			All	WM	MM	WF	MF	W	AI/AN	B	H/L	A	NHOPI	MuIti	W	AI/AN	B	H/L	A	NHOPI	MuIti	
45 4 - Protective Service	15,999-70,000 plus		241	15	156	2	68	15	-	130	21	5	-	-	2	1	63	4	-	-	-	<-Entry
46 Current Workforce	^Entry			6.2%	64.7%	0.8%	28.2%	6.2%	0.0%	53.9%	8.7%	2.1%	0.0%	0.0%	0.8%	0.4%	26.1%	1.7%	0.0%	0.0%	0.0%	
47 Percent in Category				27.6%	0.1%	14.4%	6.0%	3.2%	0.0%	0.0%	23.0%	0.1%	17.4%	3.8%	2.6%	0.0%	0.0%					<-Entry
48 Percent of Availability																						
51 Percent Underutilized												1%			22%			2%	3%			
52 Underutilized (Yes/No)								No	No	No	Yes	No	No	Yes	No	No	Yes	Yes	No	No		
53 Number Needed to Reach Parity								-	-	-	-	2	-	-	53	-	-	5	6	-	-	
54 Planned percent increase Year 1																						<-Entry
55 Planned percent increase Year 2																						<-Entry
56 Planned percent increase Year 3																						<-Entry
57 Planned percent increase Year 4																						<-Entry
58																						
59 5 - Paraprofessional			0	0	0	0	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	<-Entry
60 Current Workforce	^Entry			0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
61 Percent in Category				0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	<-Entry
62 Percent of Availability																						
65 Percent Underutilized																						
66 Underutilized (Yes/No)								No	No	No	No	No	No	No	No	No	No	No	No	No	No	
67 Number Needed to Reach Parity								-	-	-	-	-	-	-	-	-	-	-	-	-	-	
68 Planned percent increase Year 1																						<-Entry
69 Planned percent increase Year 2																						<-Entry
70 Planned percent increase Year 3																						<-Entry
71 Planned percent increase Year 4																						<-Entry
72																						
73 6 - Administrative Support	15,999-70,000 plus		318	6	82	8	222	6	3	73	4	2	-	-	8	-	212	7	3	-	-	<-Entry
74 Current Workforce	^Entry			1.9%	25.8%	2.5%	69.8%	1.9%	0.9%	23.0%	1.3%	0.6%	0.0%	0.0%	2.5%	0.0%	66.7%	2.2%	0.9%	0.0%	0.0%	
75 Percent in Category				27.6%	0.1%	14.4%	6.0%	3.2%	0.0%	0.0%	23.0%	0.1%	17.4%	3.8%	2.6%	0.0%	0.0%					<-Entry
76 Percent of Availability																						
79 Percent Underutilized												5%	3%		20%			2%	2%			
80 Underutilized (Yes/No)								No	No	Yes	Yes	No	No	Yes	No	No	Yes	Yes	No	No		
81 Number Needed to Reach Parity								-	-	15	8	-	-	-	65	-	-	5	5	-	-	
82 Planned percent increase Year 1																						<-Entry
83 Planned percent increase Year 2																						<-Entry
84 Planned percent increase Year 3																						<-Entry
85 Planned percent increase Year 4																						<-Entry
86																						

EXHIBIT 15

Employment Practices Analysis

**Four-Fifths Adverse Impact Analysis by Job Category
Hires**

Job Category (Use EEO-4)	Total		W		A/IAN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
1 - Officials & Administrators																
Number Applied	844	467	169	31	5	-	607	414	34	14	27	8	2	-	-	-
Total Hires	27	11	16	6	-	-	10	4	1	1	-	-	-	-	-	-
Selection Rate	3.2%	2.4%	9.5%	19.4%	N/A	N/A	1.6%	1.0%	2.9%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	73.6%	48.9%	100.0%	N/A	N/A	8.5%	5.0%	15.2%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	Yes	Yes	No	N/A	N/A	Yes	Yes	Yes	N/A	Yes	N/A	N/A	N/A	N/A	N/A
2 - Professionals																
Number Applied	6,192	5,132	627	201	45	15	5,131	4,701	159	98	221	113	9	4	-	-
Total Hires	180	160	41	14	-	-	130	134	5	5	4	7	-	-	-	-
Selection Rate	2.9%	3.1%	6.5%	N/A	N/A	N/A	2.5%	2.9%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	93.2%	100.0%	100.0%	N/A	N/A	N/A	38.7%	43.6%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	N/A	N/A	N/A	Yes	Yes	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3 - Technicians																
Number Applied	110	127	16	17	-	-	89	104	3	3	2	3	-	-	-	-
Total Hires	9	2	3	-	-	-	5	1	1	1	-	-	-	-	-	-
Selection Rate	8.2%	1.6%	18.8%	0.0%	N/A	N/A	5.6%	1.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	19.2%	100.0%	0.0%	N/A	N/A	30.0%	5.1%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	Yes	No	Yes	N/A	N/A	Yes	Yes	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
4 - Protective Service																
Number Applied	453	1,475	16	17	4	2	402	1,356	10	30	4	5	-	-	17	65
Total Hires	126	56	11	-	-	-	93	52	18	3	3	-	-	-	1	1
Selection Rate	27.8%	3.8%	N/A	N/A	N/A	N/A	23.1%	3.8%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.5%
Ratio to Highest Rate	100.0%	13.6%	N/A	N/A	N/A	N/A	100.0%	16.6%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	6.7%
Potential Adverse Impact (Yes/No)	No	Yes	N/A	N/A	N/A	N/A	No	Yes	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Yes
5 - Paraprofessional																
Number Applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Hires	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
6 - Administrative Support																
Number Applied	3,263	8,099	167	174	33	13	2,728	7,272	76	146	101	71	2	14	156	409
Total Hires	68	171	10	5	-	-	50	154	7	9	1	3	-	-	-	-
Selection Rate	2.1%	2.1%	N/A	N/A	N/A	N/A	1.8%	2.1%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.0%
Ratio to Highest Rate	98.7%	100.0%	N/A	N/A	N/A	N/A	86.5%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.0%
Potential Adverse Impact (Yes/No)	No	No	N/A	N/A	N/A	N/A	No	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Yes
7 - Skilled Craft																
Number Applied	3,151	534	140	4	14	3	2,667	497	69	6	125	-	-	-	136	24
Total Hires	184	4	10	-	-	-	149	4	9	-	16	-	-	-	-	-
Selection Rate	5.8%	0.7%	7.1%	N/A	N/A	N/A	5.6%	0.8%	N/A	N/A	12.8%	N/A	N/A	N/A	0.0%	N/A
Ratio to Highest Rate	100.0%	12.8%	55.8%	N/A	N/A	N/A	43.6%	6.3%	N/A	N/A	100.0%	N/A	N/A	N/A	0.0%	N/A
Potential Adverse Impact (Yes/No)	No	Yes	Yes	N/A	N/A	N/A	Yes	Yes	N/A	N/A	No	N/A	N/A	N/A	Yes	N/A
8 - Service-Maintenance																
Number Applied	3,800	3,517	127	44	29	4	3,394	3,273	70	28	32	9	7	4	141	155
Total Hires	675	725	14	5	2	1	610	685	19	5	4	-	-	-	26	29
Selection Rate	17.8%	20.6%	N/A	N/A	N/A	N/A	18.0%	20.9%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	18.7%
Ratio to Highest Rate	86.2%	100.0%	N/A	N/A	N/A	N/A	85.9%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	89.4%
Potential Adverse Impact (Yes/No)	No	No	N/A	N/A	N/A	N/A	No	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	No

**Four-Fifths Adverse Impact Analysis by Job Category
Hires**

Job Category (Use EEO-4)	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F

Notes:

Persons with Disabilities	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Number Applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Hires	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Veterans	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Number Applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Hires	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Notes:

**Four-Fifths Adverse Impact Analysis by Job Category
Promotions**

Job Category (Use EEO-4)	Total		W		A/IAN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
1 - Officials & Administrators																
Number Applied	62	35	33	14	-	-	26	17	1	4	2	-	-	-	-	-
Total Promotions	13	13	4	1	-	-	8	10	1	2	-	-	-	-	-	-
Selection Rate	21.0%	37.1%	12.1%	7.1%	N/A	N/A	30.8%	58.8%	N/A	50.0%	0.0%	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	56.5%	100.0%	20.6%	12.1%	N/A	N/A	52.3%	100.0%	N/A	85.0%	0.0%	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	Yes	No	Yes	Yes	N/A	N/A	Yes	No	N/A	No	Yes	N/A	N/A	N/A	N/A	N/A
2 - Professionals																
Number Applied	768	495	158	38	4	2	546	420	24	15	36	20	-	-	-	-
Total Promotions	237	125	35	3	3	-	182	112	10	9	7	1	-	-	-	-
Selection Rate	30.9%	25.3%	22.2%	7.9%	N/A	N/A	33.3%	26.7%	N/A	N/A	19.4%	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	81.8%	66.5%	23.7%	N/A	N/A	100.0%	80.0%	N/A	N/A	58.3%	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	Yes	Yes	N/A	N/A	No	No	N/A	N/A	Yes	N/A	N/A	N/A	N/A	N/A
3 - Technicians																
Number Applied	65	29	13	2	-	-	45	24	4	3	3	-	-	-	-	-
Total Promotions	21	15	4	1	-	-	14	13	2	1	1	-	-	-	-	-
Selection Rate	32.3%	51.7%	30.8%	50.0%	N/A	N/A	31.1%	54.2%	50.0%	33.3%	33.3%	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	62.5%	100.0%	56.8%	92.3%	N/A	N/A	57.4%	100.0%	92.3%	61.5%	61.5%	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	Yes	No	Yes	No	N/A	N/A	Yes	No	No	Yes	Yes	N/A	N/A	N/A	N/A	N/A
4 - Protective Service																
Number Applied	288	124	26	2	-	-	223	115	39	7	-	-	-	-	-	-
Total Promotions	1	8	-	-	-	-	1	8	-	-	-	-	-	-	-	-
Selection Rate	0.3%	6.5%	0.0%	N/A	N/A	N/A	0.4%	7.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	5.4%	100.0%	0.0%	N/A	N/A	N/A	6.4%	100.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	Yes	No	Yes	N/A	N/A	N/A	Yes	No	Yes	N/A	N/A	N/A	N/A	N/A	N/A	N/A
5 - Paraprofessional																
Number Applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Promotions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
6 - Administrative Support																
Number Applied	155	401	16	13	3	-	123	366	10	16	3	6	-	-	-	-
Total Promotions	10	41	1	-	-	-	9	40	-	1	-	-	-	-	-	-
Selection Rate	6.5%	10.2%	6.3%	0.0%	N/A	N/A	7.3%	10.9%	N/A	6.3%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	63.1%	100.0%	57.2%	0.0%	N/A	N/A	67.0%	100.0%	N/A	57.2%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	Yes	No	Yes	Yes	N/A	N/A	Yes	No	N/A	Yes	N/A	N/A	N/A	N/A	N/A	N/A
7 - Skilled Craft																
Number Applied	867	31	93	4	7	-	655	27	48	-	64	-	-	-	-	-
Total Promotions	260	16	17	-	1	-	211	16	19	-	12	-	-	-	-	-
Selection Rate	30.0%	51.6%	18.3%	N/A	N/A	N/A	32.2%	59.3%	39.6%	N/A	18.8%	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	58.1%	100.0%	30.8%	N/A	N/A	N/A	54.4%	100.0%	66.8%	N/A	31.6%	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	Yes	No	Yes	N/A	N/A	N/A	Yes	No	Yes	N/A	Yes	N/A	N/A	N/A	N/A	N/A
8 - Service-Maintenance																
Number Applied	1,596	1,611	25	10	4	2	1,525	1,581	34	17	8	1	-	-	-	-
Total Promotions	19	15	1	-	-	-	17	15	-	-	1	-	-	-	-	-
Selection Rate	1.2%	0.9%	N/A	N/A	N/A	N/A	1.1%	0.9%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	78.2%	N/A	N/A	N/A	N/A	100.0%	85.1%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	Yes	N/A	N/A	N/A	N/A	No	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

**Four-Fifths Adverse Impact Analysis by Job Category
Promotions**

Job Category (Use EEO-4)	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F

Notes:

Persons with Disabilities	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Number Applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Promotions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Veterans	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Number Applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Promotions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Notes:

**Four-Fifths Adverse Impact Analysis by Job Category
Terminations**

Job Category (Use EEO-4)	Total		W		A/IAN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
1 - Officials & Administrators																
Total Workforce	62	35	33	14			26	17	1	4	2	-	-	-	-	-
Total Involuntary Terminations	31	17	15	3			14	14	1		1	-	-	-	-	-
Involuntary Termination Rate	50.0%	48.6%	45.5%	21.4%	N/A	N/A	53.8%	82.4%	N/A	0.0%	50.0%	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	97.1%	100.0%	0.0%	0.0%	N/A	N/A	0.0%	0.0%	N/A	100.0%	0.0%	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	Yes	Yes	N/A	N/A	Yes	Yes	N/A	No	Yes	N/A	N/A	N/A	N/A	N/A
2 - Professionals																
Total Workforce	767	495	158	38	3	2	546	420	24	15	36	20	-	-	-	-
Total Involuntary Terminations	336	193	77	16	1	1	236	159	9	11	13	6	-	-	-	-
Involuntary Termination Rate	43.8%	39.0%	48.7%	42.1%	N/A	N/A	43.2%	37.9%	N/A	N/A	36.1%	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	89.0%	100.0%	74.1%	85.8%	N/A	N/A	83.5%	95.4%	N/A	N/A	100.0%	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	No	N/A	N/A	No	N/A	N/A	N/A	N/A	N/A
3 - Technicians																
Total Workforce	65	29	13	2			45	24	4	3	3	-	-	-	-	-
Total Involuntary Terminations	26	12	8	1			18	10	-	1	-	-	-	-	-	-
Involuntary Termination Rate	40.0%	41.4%	61.5%	50.0%	N/A	N/A	40.0%	41.7%	0.0%	33.3%	0.0%	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	96.7%	0.0%	0.0%	N/A	N/A	0.0%	0.0%	100.0%	0.0%	100.0%	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	Yes	Yes	N/A	N/A	Yes	Yes	No	Yes	No	N/A	N/A	N/A	N/A	N/A
4 - Protective Service																
Total Workforce	295	124	26	2			223	115	39	7	7	-	-	-	-	-
Total Involuntary Terminations	156	63	24	4			119	56	11	3	2	-	-	-	-	-
Involuntary Termination Rate	52.9%	50.8%	92.3%	N/A	N/A	N/A	53.4%	48.7%	28.2%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	96.1%	100.0%	30.6%	N/A	N/A	N/A	52.9%	57.9%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	Yes	N/A	N/A	N/A	Yes	Yes	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A

**Four-Fifths Adverse Impact Analysis by Job Category
Terminations**

Job Category (Use EEO-4)	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
5 - Paraprofessional																
Total Workforce	-	-					-	-	-	-	-	-	-	-	-	-
Total Involuntary Terminations	-	-					-	-	-	-	-	-	-	-	-	-
Involuntary Termination Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
6 - Administrative Support																
Total Workforce	156	401	16	13	3		123	366	11	16	3	6	-	-	-	-
Total Involuntary Terminations	103	203	15	11			78	178	8	9	2	5	-	-	-	-
Involuntary Termination Rate	66.0%	50.6%	93.8%	84.6%	N/A	N/A	63.4%	48.6%	N/A	56.3%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	76.7%	100.0%	51.9%	57.5%	N/A	N/A	76.7%	100.0%	N/A	86.5%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	Yes	No	Yes	Yes	N/A	N/A	Yes	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A
7 - Skilled Craft																
Total Workforce	867	27	93		7		655	27	48	-	64	-	-	-	-	-
Total Involuntary Terminations	180	6	33		1		133	6	7	-	6	-	-	-	-	-
Involuntary Termination Rate	20.8%	22.2%	35.5%	N/A	N/A	N/A	20.3%	22.2%	14.6%	N/A	9.4%	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	93.4%	26.4%	N/A	N/A	N/A	46.2%	42.2%	64.3%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	Yes	N/A	N/A	N/A	No	No	No	N/A	No	N/A	N/A	N/A	N/A	N/A
8 - Service-Maintenance																
Total Workforce	1,596	1,608	25	10	4		1,525	1,581	34	17	8	-	-	-	-	-
Total Involuntary Terminations	669	570	15	8	2		638	556	12	6	2	-	-	-	-	-
Involuntary Termination Rate	41.9%	35.4%	N/A	N/A	N/A	N/A	41.8%	35.2%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	84.6%	100.0%	N/A	N/A	N/A	N/A	84.1%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	N/A	N/A	N/A	N/A	No	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Notes: