



LEE COUNTY TRANSIT EQUAL EMPLOYMENT OPPORTUNITY PROGRAM

UPDATE 2022

Prepared for:  lee tran

Prepared by:  Kimley»Horn



Table of Contents

Background	2
Equal Employment Opportunity Policy Statement.....	5
Dissemination Of Policy.....	6
Designation Of Personnel Responsibility	7
Complaint Procedures	9
Utilization Analysis.....	11
Employment Practices.....	13
Goals And Timetables	18
Monitoring and Reporting System.....	19
Subrecipients/Contractors	22

Appendix A – LeeTran Utilization Analysis and Lee County EEO Utilization Report

Appendix B – Employment Practices Assessment

Appendix C – LeeTran’s Current Workforce

Appendix D – Organizational Charts

Appendix E – Goals and Timetables from LeeTran March 2018 EEO Program Update



Background¹

The Federal Transit Administration (FTA) is one of 12 operating administrations within the U.S. Department of Transportation (DOT) headed by an Administrator who is appointed by the President of the United States. FTA functions through a Washington, DC, headquarters office, ten regional offices, and five metropolitan offices that assist transit agencies in all 50 states, the District of Columbia, Puerto Rico, the U.S. Virgin Islands, Guam, Northern Mariana Islands, and American Samoa.

Since 1977, DOT has required recipients of transit funding meeting certain criteria to establish Equal Employment Opportunity (EEO) Programs and to comply with applicable laws and regulations.

LeeTran is a recipient of FTA funding assistance and is therefore subject to EEO compliance conditions associated with the use of these funds pursuant to 49 U.S.C. Section 5332 and FTA Circular 4704.1A.

As a recipient of FTA funding assistance, LeeTran is required to submit an updated Equal Employment Opportunity Program (EEO Program) to the FTA every four years or as major changes occur in the work force or employment.

Under Federal Transit Laws, FTA is responsible for ensuring that its recipients do not engage in employment discrimination:

A person may not be excluded from participating in, denied a benefit of, or discriminated against under a project, program, or activity receiving financial assistance under this chapter because of race, color, religion, national origin, sex, disability, or age. (49 U.S.C. § 5332(b))

This provision applies to employment opportunities and supplements employment protections found in Title VI of the Civil Rights Act of 1964 (Title VI). The Title VI regulations prohibiting employment discrimination are found at 49 CFR § 21.5(c) – Nondiscrimination in Federally Assisted Programs of the Department of Transportation. It is important to note that while Title VI and 49 CFR Part 21 only prohibit discrimination based on race, color, and national origin, Federal Transit Laws (49 U.S.C. § 5332) includes protections on the basis of religion, sex, disability, and age. In this context, the term “sex” includes pregnancy, childbirth, or related medical conditions; gender identity; and sexual orientation.

Title VII of the Civil Rights Act of 1964 (Title VII), as amended by the Equal Employment Opportunity Act of 1972 and the Civil Rights Act of 1991, prohibits discrimination on the basis of race, color, religion, national origin, or sex in all institutions with 15 or more employees—including state and local governments and labor organizations. (42 U.S.C. §§ 2000e et seq.) Title II of the Genetic Information Nondiscrimination Act of 2008 (GINA) applies to private employers and state and local government employers with at least 15 employees, regardless of whether they receive federal financial assistance. It prohibits covered employers from discriminating on the basis of an applicant’s or employee’s genetic information (such as the results of genetic tests or family medical history),

¹ This “Background” section of the LeeTran Equal Employment Opportunity Program contains excerpts from FTA Circular 4704.1A, *Equal Employment Opportunity Requirements and Guidelines for Federal Transit Administration Recipients*, Rev. 1, April 20, 2017.



generally prohibits employers from acquiring genetic information of applicants and employees, and requires employers to keep genetic information confidential, with very limited exceptions.

The U.S. Equal Employment Opportunity Commission (EEOC) is the enforcement authority for Title VII and provides official interpretation of employment laws that prohibit discrimination as outlined in 29 CFR Part 1600. EEOC enforces not only Title VII and GINA, but also the Equal Pay Act of 1963, the Age Discrimination in Employment Act of 1967, Title I of the Americans with Disabilities Act of 1990, Sections 501 and 505 of the Rehabilitation Act of 1973. FTA defers to the most current regulations and guidance issued by EEOC when making complaint and compliance determinations. EEOC regulations and guidance are incorporated by reference.

Section 503 of the Rehabilitation Act of 1973, as amended by the Rehabilitation Act of 1993, requires firms holding federal contracts or subcontracts in excess of \$10,000 to “take affirmative action to employ and advance in employment qualified individuals with disabilities.” (29 U.S.C. § 793)

Section 504 of the Rehabilitation Act of 1973 states, “No otherwise qualified individual with a disability in the United States ... shall, solely by reason of her or his disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” (29 U.S.C. § 794)

DOT regulations implementing provisions of the Rehabilitation Act are contained in 49 CFR Part 27 – Nondiscrimination on the Basis of Disability in Programs or Activities Receiving Federal Financial Assistance:

No qualified person with a disability shall, solely by reason of his disability, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity that receives Federal financial assistance administered by the Department of Transportation. (49 CFR § 27.7(a))

Other nondiscrimination laws may also apply to recipients of federal assistance. The Equal Pay Act of 1963, as amended, requires employers to provide equal pay to men and women who perform substantially equal work in the same establishment. (29 U.S.C. § 206(d)) The Age Discrimination in Employment Act of 1967, as amended, prohibits employment discrimination against employees based on age. (29 U.S.C. §§ 621 et seq.) Title IX of the Education Amendments of 1972, as amended, prohibits discrimination based on sex in education programs or activities receiving federal assistance. (20 U.S.C. §§ 1681 et seq.) The Americans with Disabilities Act of 1990, as amended, prohibits discrimination against persons with disabilities. (42 U.S.C. §§ 12101 et seq.) Military veterans’ employment and reemployment rights are covered under the Uniformed Services Employment and Reemployment Rights Act of 1994. (38 U.S.C. §§ 4301 et seq.)

All of the above-listed federal nondiscrimination statutes and regulations will be referred to, collectively, as “EEO statutes and regulations.”



This LeeTran Equal Employment Opportunity (EEO) Program supersedes the March 2018 EEO Program. It includes the following program elements:

1. Statement of Policy;
2. Plan for dissemination of information both internally and externally;
3. Designation of appropriate personnel responsible for carrying out the EEO Program, including the designation of an EEO Officer;
4. Utilization Analysis;
5. Goals and timetables to correct identified areas of underutilization or concentration;
6. Assessment of LeeTran's employment practices; and,
7. Plan for monitoring and reporting on the EEO Program.



Equal Employment Opportunity Policy Statement

Lee County and LeeTran, collectively referred to as “we,” have a strong commitment to the community we serve and our employees. As an equal opportunity employer, we strive to have a workforce that reflects the community we serve. No person is unlawfully excluded from employment opportunities based on race, sex (including gender identity, sexual orientation, and pregnancy), religion, color, national origin, ancestry, disability, age, veteran status, or any other categories protected under federal or state law.

LeeTran’s Equal Employment Opportunity (EEO) Program applies to all employment actions, including but not limited to: recruitment, hiring, selection for training, promotion, transfer, demotion, layoff, termination, rates of pay, or other forms of compensation, benefits, use of facilities, and service.

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

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

As Lee County’s County Manager, I maintain overall responsibility and accountability for LeeTran’s compliance with its EEO Program. To ensure day-to-day management, including program preparation, monitoring, and complaint investigation, I have appointed as LeeTran’s EEO Officer, Joan D. LaGuardia, Title VI Nondiscrimination Coordinator [2115 Second Street, Fort Myers, FL 33902; Phone: 239-533-2314; E-mail: jlguardia@leegov.com]. Joan LaGuardia reports directly to me on EEO matters and operates under my direct authority with all levels of management, labor unions, and employees.

All LeeTran executives, management, and supervisory personnel, however, share in the responsibility for implementing and monitoring LeeTran’s EEO Program within their respective areas and will be assigned specific tasks to ensure compliance is achieved. LeeTran will evaluate its managers’ and supervisors’ successful implementation of LeeTran’s EEO Program, in the same way LeeTran assesses their performance regarding other agency goals.

LeeTran is committed to undertaking and developing a written nondiscrimination program that sets forth the policies, practices and procedures, with goals and timetables, to which the agency is committed. In turn, LeeTran’s EEO Program is available for inspection by any employee or applicant for employment upon request.

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

Roger Desjarlais, Lee County Manager

Roger Desjarlais
Signature

2-14-22
Date



Dissemination Of Policy

In furtherance of LeeTran's EEO Program and its commitment to promote the concepts of EEO for all employees, applicants, and potential applicants for employment, LeeTran's EEO Program is available for review through various means within Lee County government, LeeTran, and Lee County at large.

Internal

- LeeTran's EEO Policy Statement by the County Manager will be posted in conspicuous locations so that employees, applicants, and potential applicants are aware of LeeTran's commitment to EEO.
- The EEO Policy Statement will be included in LeeTran's *Employee Policies and Procedures Manual*.
- Federal and Labor Law posters will be reproduced and posted on bulletin boards, in the Human Resources Division, and in areas where employees normally congregate.
- The EEO officer will meet with top management officials, semiannually, at a minimum, to discuss the EEO Program and its implementation.
- New LeeTran employees will be given the County Manager's EEO Policy Statement in employee orientation materials and will be required to sign a form acknowledging that they have read and understand the policy.
- The EEO Officer will meet with all employees and affinity groups to seek input on the EEO Program implementation.
- Lee County will conduct periodic EEO training for employees and managers.
- EEO training for all new LeeTran supervisors and managers will be conducted within 90 days of their appointment.
- The EEO Program is available on the LeeTran Intranet and the Lee County Human Resources Department Intranet.
- LeeTran will maintain appropriate documentation that the EEO Program has been brought to the attention of employees and managers, including maintaining agendas and sign-in sheets for meetings conducted when the EEO policy and its implementation are explained.

External

- The County Manager's EEO Policy Statement and Program is available on LeeTran's website at <https://www.leegov.com/leetrans/compliance>.
- All LeeTran job postings include the following statement: "LeeTran is an equal opportunity employer." Veteran's Preference is also communicated via the website and job postings. The Lee County job opportunities website also indicates that Lee County is an at-will employer.
- The EEO Policy Statement is posted at various locations countywide.
- LeeTran's EEO Program is provided to Lee County Public Libraries.
- The EEO Policy is disseminated to recruitment entities (e.g., employment agencies, educational institutions, etc.) whenever outreach or advertising is directed to those entities.



Designation Of Personnel Responsibility

All LeeTran's executives, management, and supervisory personnel share in the responsibility for implementing and monitoring LeeTran's EEO Program within their respective departments and areas of supervisory responsibilities.

While the ultimate responsibility and accountability for implementing LeeTran's EEO Policy and Program resides with the Lee County Manager, he is assisted by EEO Officer Joan D. LaGuardia. Ms. LaGuardia is the County Title VI Nondiscrimination Coordinator, who reports directly to the County Manager on EEO matters to further LeeTran's EEO Policy and Program objectives using LeeTran resources and personnel. LeeTran organizational charts are provided in Appendix D.

The EEO Officer's program responsibilities include the following:

- Develop LeeTran's EEO Policy Statement and written EEO Program.
- Assist LeeTran management in the collection and analysis of employment data, identifying problems or opportunity areas, setting goals and timetables, and developing programs to achieve goals.
- Design, implement, and monitor the internal audit and reporting system to measure program effectiveness and determine where progress has been made and where proactive action is needed.
- Review LeeTran's nondiscrimination plan with all managers and supervisors to ensure that the policy is understood.
- Concur in the hiring and promotion process.
- In conjunction with human resources, periodically review employment practice policies (e.g., hiring, promotions, training), complaint policies, reasonable accommodation policies, performance evaluations, and grievance procedures.
- Report, at least semiannually, to the Lee County Manager, LeeTran's progress in relation to LeeTran's goals and contractor and vendor compliance.
- Serve as the liaison between Lee County and federal, state, county, and local governments; regulatory agencies; community groups representing minorities, women, and persons with disabilities; and others.
- Maintain awareness of current EEO laws and regulations and ensure the laws and regulations affecting nondiscrimination are disseminated to responsible officials.
- Investigate complaints of EEO discrimination and take appropriate action.
- Provide EEO training for LeeTran employees and managers.
- In conjunction with Human Resources, advise LeeTran employees and applicants about available training programs, professional development opportunities, and entrance requirements.
- Audit postings of the EEO policy statement to ensure compliance information is posted and up to date.

EEO responsibilities for LeeTran executives, managers, and supervisors include the following:

- Participate actively in periodic audits of all aspects of employment to identify and remove barriers obstructing the achievement of specified goals and objectives.
- Hold regular discussions with other LeeTran managers, supervisors, employees, and affinity groups to ensure agency policies and procedures are being followed.



- In conjunction with the EEO Officer, maintain and update the personnel database for generating reports required for the nondiscrimination program.
- Cooperate with the EEO Officer in reviewing information and investigating complaints.
- Encourage LeeTran employee participation to support the advancement of the EEO Program (e.g., professional development and career growth opportunities, posting of promotional opportunities, shadowing, mentoring).



Complaint Procedures

Employees or applicants for employment having reason to believe they may have been subjected to discrimination prohibited by EEO statutes and regulations are urged to bring those concerns to the attention of their immediate supervisor, department director, the Director of Human Resources or designee(s), the Lee County EEO Officer, or the County Manager, as appropriate, as provided in the Lee County Policies and Procedures Manual and detailed in Section 202:3. As stated in that section, complainants are urged to report such concerns within 15 days of the occurrence of the incident(s) in question. Prompt reporting allows for timely investigation and quick resolution of complaints.

Incidents may be reported, as appropriate, in person, by phone, by interoffice mail, or U.S. Mail to:

Lee County Department of Human Resources

1825 Hendry Street, Suite 200
Fort Myers, FL 33901
Phone: 239-533-2245
E-mail: jlguardia@leegov.com

Lee County Equal Opportunity Officer

2115 Second Street, Fourth Floor
Fort Myers, FL 33901
Phone: 239-533-2314
E-mail: jlguardia@leegov.com

In addition, such employees or applicants for employment may file a written complaint with the Florida Commission on Human Relations (FCHR), Federal Transit Administration (FTA), or Equal Employment Opportunity Commission (EEOC).

A complaint must be filed with FCHR no later than 365 days after the date of the alleged discrimination. A complaint must be filed with FTA and EEOC no later than 180 days after the date of the alleged discrimination, unless extended by the respective agency.

Florida Commission on Human Relations

4075 Esplanada Way, Unit 110
Tallahassee, FL 32399
Phone: 850-488-7082
Toll-Free: 800-342-8170 | Fax: 850-487-1007
TDD ASCII: 800-955-1339
TDD Baudot: 800-955-8771
Web Site: <http://fchr.state.fl.us>
E-mail: fchrinfo@fchr.myflorida.com

Federal Transit Administration

Office of Civil Rights Attention: Complaint Team East Building, Fifth Floor
TCR 1200 New Jersey Avenue, SE
Washington, DC 20590
Web Site:
<https://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/file-complaint-fta>

Equal Employment Opportunity Commission

Miami District Office
100 SE Second Street, Suite 1500
Miami, FL 33131
Phone: 800-669-4000 | Fax: 305-808-1855 | TTY: 800-669-6820
Web Site: <http://eeoc.gov/field-office/miami/location>



Utilization Analysis

In accordance with federal regulations, utilization analyses are completed semiannually and with each EEO program update to identify job categories within the LeeTran workforce that are experiencing underutilization in terms of their gender or minority composition.

The utilization analysis was completed to identify job categories within the LeeTran workforce that are underutilized compared to the Lee County labor market. The utilization analysis includes a statistical breakdown of LeeTran's workforce by job category, cross referenced by gender and race, and is shown in Appendix A. The LeeTran workforce included for the analysis presented in Appendix A is based on Lee County employment records as of November 3, 2021. Lee County is identified as the labor market for the utilization analysis and the composition of the Lee County labor market is based on 2014 to 2018 5-year American Community Survey (ACS) data which is the most recent available data that describes the demographic make-up of the available labor market by job category, gender and race.

To complete the utilization analysis, the percentages of employees by gender and race for each job category were compared between the LeeTran workforce and the Lee County labor market. The comparison is used to identify underutilized groups and areas of deficiency and to identify goals to improve parity across demographics and job categories. The results of the analysis are provided in Appendix A.

Based on the utilization analysis, demographic groups within each job category that exhibit greater than 10 percent underutilization and that require more than 3 employees to reach parity are identified as potential focus areas for increasing overall representation. The focus areas identified are listed in Table 1. Salient conclusions from the utilization analysis include the following:

- The Technicians job category includes fleet technicians, and this is a critical job function where most transit agencies find underutilization within the proportion of female staff.
- The Paraprofessional category includes staff serving in a variety of roles but that consists primarily of supervisor staff (i.e., 15 out of 20 staff). Only 2 of LeeTran's 15 supervisor and senior supervisor staff in the Paraprofessional category are female.
- The Service Maintenance category includes the greatest number of employees within LeeTran, 206, as it includes bus operators. The larger number of employees needed for bus operator positions provides for more opportunity for diversifying the staff in this category.

Importantly, the underutilization of White females did improve within this job category (i.e., from 21% to 10%) when compared to LeeTran's 2018 EEO report which demonstrates that LeeTran has acknowledged this underutilization and is making gains in improving parity.



Table 1: Utilization Focus Areas

Job Category	Demographic	Underutilized (Employees to reach parity)	Notes
Technician	White Female	27% (4)	Improved utilization since 2017
Paraprofessional	White Female	43% (8)	Reduced utilization since 2017*
Service Maintenance	White Female	10% (20)	Improved utilization since 2017**

* The paraprofessional LeeTran workforce is compared to the overall Lee County labor market average by gender and race based on the available data for this job category

** Bus operators were categorized in the Skilled Craft job category in 2017 and in the Service Maintenance job category in 2021. Consequently, those two categories are used for this comparison.

As a reference, overall demographic information for LeeTran employees is compared to the overall Lee County labor market in Table 2. As shown, LeeTran's employee racial composition is similar to the Lee County labor market except for Black or African American persons. LeeTran employs approximately 23 percent Black or African American persons which is much higher than the Lee County labor market estimate of 9 percent. In addition, as shown in Table 2, LeeTran's workforce is approximately 30 percent female which is lower than what is available in the Lee County labor market at approximately 50 percent. It is important to note that Lee County is making gains in increasing the number of females in their workforce as the percentage of female workers did increase between 2018 and 2022, from 23 percent to 28 percent.

Table 2: Overall Employee Demographic Comparison

Demographic	LeeTran Employees		Lee County Labor Market	
	Male	Female	Male	Female
White	39.3%	13.6%	33.6%	32.4%
Native American/Alaskan Native	0.4%	0%	0.1%	0.1%
Black/African American	14.3%	8.9%	4.0%	4.5%
Hispanic/Latino	16.1%	4.6%	12.7%	9.4%
Asian	0.7%	0.4%	0.7%	1.0%
Multiple Races/Other	1.1%	0.7%	0.8%	0.6%
Total	72%	28%	52%	48%



Employment Practices

A review of LeeTran employment practices was completed to identify potential impacts to achieving diversity across hiring, promotions, training, terminations, and disciplinary actions. LeeTran's applicants and hires, promotions, terminations, and disciplinary actions data is provided for January 2018 to October 2021, by gender and race and cross referenced by job category, as shown in Appendix B. The employment practices charts in Appendix B identify potential adverse impact, as defined by FTA and the EEOC website, using the following four step process:

1. Calculate the rate of selection for each group (divide the number of persons selected from a group by the number of applicants from that group)
2. Observe which group has the highest selection rate
3. Calculate impact ratios by comparing the selection rate for each group with that of the highest group (divide the selection rate for a group by the selection rate for the highest group)
4. Observe whether the selection rate for any group is substantially less (i.e., usually less than 4/5ths or 80 percent) than the selection rate for the highest group. If it is, an adverse impact is possible and further evaluation should be performed.

Based on the resulting analysis, any potential adverse impacts were further reviewed to identify feasible action toward improving diversity across employment practice categories. That review was based on an understanding of the Lee County labor market, LeeTran's historical employment practices, and other important employment considerations by job category. The following section is a summary of the employment practices and statistical analysis of demographics by job category, including informed conclusions to set attainable goals as described in the Goals and Timetables section. In addition, Appendix C includes the current workforce in order of lowest- to highest-paid positions, including details on staff race and gender.

Hiring

Available positions within LeeTran are posted on the Lee County Recruitment webpage (www.governmentjobs.com/careers/leecounty), and through the Hispanic Chamber of Commerce and local colleges. Fleet technician positions have also been posted at local vocational schools. If there is an insufficient number of applicants for a vacant position, Lee County will look at other options to increase the quality and diversity of the applicant pool.

A review of job applicants and hires from January 2018 to October 2021 was completed to identify if persons applying for jobs within LeeTran are underrepresented and if the hiring rate among those applicants reflects a potential adverse impact across a demographic category. This review helps to determine what strategies should be developed to reach certain groups and make them aware of LeeTran's job opportunities.

It is important to note that on the LeeTran job application, applicants are not required to indicate their race or gender. Consequently, approximately 67 percent (2,226 of 3,336 applications) and 5 percent (164 of 3,336) of LeeTran applicants did not indicate gender or race, respectively. These applications were not included in the Hiring Employment Analysis. This is important in that exclusion



of the demographic make-up of those applicants results in an incomplete picture of who applicants are and also the hiring rate for LeeTran. This hiring analysis includes 1,100 applications.

Based on the 4/5ths rule, a potentially adverse impact is identified for hiring rates in the Professional, Technician, Paraprofessional, Administrative Support, Skilled Craft, and Service Maintenance job categories as shown in Appendix B. The demographic groups with the highest potential of adverse impact are listed below and should be included as a goal for increased representation.

- Professionals – When compared to the other race and gender categories, Black or African American Males exhibit a low selection rate given the number of applicants. No Black or African American males were hired out of 17 applicants.
- Technicians – Female applicants have a lower selection rate (3.3% average) than Male applicants (11% average) for all races that applied.
- Paraprofessional – Black or African American Males exhibit a low selection rate given the number of applicants and when compared to the other race and gender categories. No Black or African American males were hired out of 19 applicants.

It is important to reiterate that applicant information is incomplete for this hiring practice analysis as only about 33 percent of applicants indicated their gender and/or race when submitting an employment application to LeeTran.

In addition to the hiring analysis, a comparison between the applicants and the available Lee County Workforce was completed. As shown in Table 3, the percent composition of applicants and the percent composition of the Lee County Workforce across demographics is similar. However, the percent of female applicants is greater than the percent of available within the Lee County Workforce. This allows for an opportunity to increase the hiring rate of female employees across all races.

Table 3: Applicants and Lee County Labor Force

Demographic	Applicants		Lee County Labor Market	
	Male	Female	Male	Female
White	30.5%	20%	33.6%	32.4%
Native American/Alaskan Native	0.9%	0.2%	0.1%	0.1%
Black/African American	12.1%	14.9%	4.0%	4.5%
Hispanic/Latino	9%	7.3%	12.7%	9.4%
Asian	0.3%	0.5%	0.7%	1.0%
Multiple Races	1.4%	2.9%	0.8%	0.6%
Total	54%	46%	52%	48%



Individuals with Disabilities and Veterans

On June 14, 2021, the Federal Transit Administration (FTA) required LeeTran to obtain statistical data to include individuals with disabilities and veterans in order to accurately identify trends that include all data that could lead to employment barriers. At the time of preparation of this EEO Program Update, only three months of data were available covering the period between July 2021 through October 2021. During that period, 215 employment applications were received by LeeTran.

Individuals with Disabilities

On September 29, 2021, LeeTran implemented a Voluntary Self-Identification of Disability Status form to its employment application. The Voluntary Self-Identification form is confidential and will not be seen by selecting officials or anyone else involved in making personnel decisions. Based on the applications received between September 29, 2021 and October 2021, no applicants indicated having a disability.

Veterans

Between July 2021 and October 2021, 20 applicants claimed Veterans Preference and six were considered eligible. Within that timeframe, two people with Veterans Preference Eligibility were hired, one as a Bus Operator and one as a Fleet Technician. A summary of applicants and hires by demographic category is shown in Appendix B and Table 4.

Table 4: Veteran Applicants and Hires

Demographic	Applicants	Hires
White Male	10	2
White Female	5	0
Black/African American Male	4	0
Hispanic/Latino Male	1	0

Promotions

A review of promotions from January 2018 to October 2021 was completed to identify if any demographic groups are underrepresented in terms of promotions and if there is a potential adverse impact across a demographic group. Based on the 4/5ths rule, a potentially adverse impact is identified based on selection rates in the Professionals, Technicians, Paraprofessionals, Administrative Support, and Service Maintenance job categories as shown in Appendix B.

Further analysis of the promotions data reveals several important aspects from the three-year data:

- Only a small number of promotions were issued over the analysis period within each job category identified for a potential adverse impact and this equates to a small number bias which push statistical results over the 4/5ths thresholds for potentially adverse impacts.
- Within each category, the available promotions are evenly distributed among the applicant demographic groups. For example, the four total promotions afforded within the analysis period to Technicians occurs across four of six different applicant groups. This is also true for Paraprofessionals and Administrative Support promotions.
- The potential adverse impacts under the Professionals job category are offset in that three of only four promotions given over the three-year analysis period were to Black or African American Females, a historically underrepresented group.



For the analysis, the number of applicants for a promotion is based on the number of employees in that demographic and job category, as of November 3, 2021. Table 5 below summarizes the overall promotion rate by demographic group compared to the LeeTran workforce. In general, the promotion rate for female employees is much greater than the percent composition of females in the workforce.

Table 5: Promotion Rate

Demographic	Promotion Rate		LeeTran Employees	
	Male	Female	Male	Female
White	25.8%	19.4%	39.3%	13.6%
Native American/Alaskan Native	0%	0%	0.4%	0%
Black/African American	6.5%	25.8%	14.3%	8.9%
Hispanic/Latino	12.9%	6.5%	16.1%	4.6%
Asian	0%	0%	0.7%	0.4%
Multiple Races	0%	3.2%	1.1%	0.7%
Total	45%	55%	72%	28%

In terms of reclassifications, all employee reclassifications are reviewed and approved by Lee County Human Resources through the Position Analysis Questionnaire Process. Any employee promoted to or hired for a LeeTran position that is not due to reclassification applies for and interviews for the open position. It is Lee County’s policy that no employment decisions are based on protected-class status. LeeTran’s employment practice is to hire the most qualified applicant for the position. LeeTran also has an Employee Policies and Procedures Manual to further identify how employees should perform.

Terminations

A review of terminations from January 2018 to October 2021 was completed to identify if employee terminations within LeeTran have a potential adverse impact across a demographic group. Within this timeframe, 9 terminations, 5 males and 4 females, occurred within the Service Maintenance job category. The Service Maintenance job category includes the highest number of employees (206 of 281 total employees) at LeeTran, demonstrating that four percent of employees were terminated within the job category and three percent were terminated agency wide. Potential adverse impact based on gender or race is not identified based on the 4/5ths rule. A summary of the Terminations by gender and race is shown in Appendix B.

Disciplinary Action

Lee County’s Corrective Action/Disciplinary Procedure Number 601 identifies the processes to be taken at various discipline levels to assist in transparency in the steps taken and achieve fair and equitable application. Policy Number 601 is available to all employees so that management and staff are aware of the disciplinary processes and ensure that actions are followed. LeeTran’s *Policies and Procedures Manual* also identifies disciplinary actions and is provided to all LeeTran employees.

A review of the disciplinary actions from January 2018 to October 2021 was completed to identify if disciplinary actions within LeeTran have a potential adverse impact across a demographic group. As shown in Appendix B, a potentially adverse impact is identified based on discipline rates in the Technicians, Paraprofessionals, Administrative Support, and Service Maintenance job categories. Based on the analysis, the highest potential of adverse impact is identified in the Service Maintenance job category for Black or African American male and female employees.



Further analysis of the disciplinary action data reveals several important aspects from the three-year data:

- White males make up the majority of total disciplinary actions identified within the Technician and Paraprofessional categories, 10 out of 13 and six out of 11, respectively. The small number of disciplinary actions taken over the three-year evaluation period proves difficult to draw firm conclusions about potentially adverse impacts.
- For the Administrative Support category, all three disciplinary actions were issued to White females. The small number of disciplinary actions taken over the three-year evaluation period proves difficult to draw firm conclusions about potentially adverse impacts.
- The distribution of total disciplinary actions within the Service Maintenance category sums to 143 for White employees (50%), 85 for Black or African American employees (30%), and 57 for Hispanic or Latino employees (20%). These percentage totals are in line with the demographic composition of LeeTran's service maintenance workforce (i.e., 49.5% White, 26.3% Black or African American, and 21.9% Hispanic or Latino).

Training

Lee County conducts in-house training using classroom and webinar techniques to provide its employees with additional training opportunities which employees can sign up for using WebConnect. Examples of training opportunities provided for staff include the following:

- Proper interview techniques
- Counseling to assist employees in identifying promotional opportunities
- Training and educational programs to increase promotion and transfer opportunities
- Retraining and counseling to increase job performance and job knowledge
- Leadership training for identified talent

Importantly, LeeTran does not screen or select employees for specific job category trainings that result in promotional potential. Training and educational programs are made available to staff and staff are encouraged to apply and participate at their own discretion. In addition, and as indicated under the promotions section of this EEO Program Update, all employees apply for and interview for open positions, except those that are due for a reclassification. LeeTran's employment practice is to hire the most qualified applicant for the position and does not make employment decisions based on protected-class status.

A number of other important and required trainings that impact day-to-day operations are afforded to employees. For example, Lee County staff receive harassment avoidance training on an annual basis and LeeTran bus operators attend refresher and annual retraining. All LeeTran staff receive drug-free workplace and distracted driving training.



Goals And Timetables

LeeTran has created goals and timetables to assure continued equitable utilization as well as improve areas of identified weakness of minority and/or female representation. The utilization analysis concluded that females are underrepresented among the bus operator (Service Maintenance), fleet mechanic (Technician), and supervisor (Paraprofessional) staff. The analysis of applicants and hires, as documented in the Employment Practices section, indicates that an increased hiring rate for female applicants and Black or African American applicants would improve utilization and is consistent with the available number of applicants applying for positions at LeeTran.

Goals and Timetables have been established to assist with recurring efforts to encourage a larger and more diversified pool of applicants. The established goals are a guidepost and are reasonably attainable by means of applying a good faith effort.

Attainment of 2018 EEO Program goals are included in Appendix E and Table 6 and Table 7 identifies new or revised goals based on the utilization and employment practices analyses presented.

Table 6: Short Term Goals

Goal	Accomplished
Coordinate with Florida Gulf Coast University (FGCU), technical schools, local colleges, and Florida's historically Black colleges and universities to distribute information on LeeTran's services and career opportunities to increase the pool of potential applicants.	<input type="checkbox"/>
Continue to attend job fairs and other events at the Hispanic Chamber of Commerce, as available and within budget.	<input type="checkbox"/>
Provide employment opportunity information, including current vacancy listings as well as a listing of the various job classifications available within the County, to local minority groups, including the Hispanic Chamber of Commerce.	<input type="checkbox"/>
Provide internal employment branding to inform all current employees of Lee County benefits to create a positive reputation in the community as a great place to work and, in turn, improve applicant pool and retention.	<input type="checkbox"/>
Examine Professional and Paraprofessional job applications and job descriptions in order to determine if barriers exist for Black or African American male applicants, and, if so, what actions can be taken to reduce those barriers.	<input type="checkbox"/>

Table 7: Long-Term Goals

Goal	Accomplished
Make available and encourage opportunities for female employees with an interest in technical positions.	<input type="checkbox"/>
Coordinate with local colleges, universities, and technical schools when FTA has grant programs for training in transit to increase the LeeTran applicant pool.	<input type="checkbox"/>
Continue to increase overall representation of female staff within bus operator and supervisor job classifications as positions are available and qualified applications are received.	<input type="checkbox"/>
Increase overall representation of Hispanic or Latino, Black or African American, Asian, and American Indian or Alaska Native in customer service, management, and fleet mechanic positions, or a proportionate rate of population available positions ratio, as positions are available and qualified applications are received.	<input type="checkbox"/>



Monitoring and Reporting System

An important part of any successful EEO program is the establishment of an effective and implementable internal monitoring and reporting process. This determines if the EEO Program is accomplishing equity in employment. To monitor the LeeTran EEO Program and guarantee accurate reporting, the following steps will be taken:

1. The Lee County EEO Officer will meet with the County Manager to discuss the progress of the EEO Program and results of program monitoring.
2. LeeTran shall document the sources utilized for advertising job openings and include sources that are specific to protected groups. The Lee County EEO Officer shall review these sources semiannually to determine if the level of advertising for open positions is being completed to promote applicants in areas where there is underutilization. In support of advertising LeeTran vacant positions, Lee County's process is to advertise positions through www.governmentjobs.com. Lee County will also send information regarding job classifications and instructions for accessing current position listings on www.governmentjobs.com to the Hispanic Chamber of Commerce, and local colleges.
3. The minority/gender identities of applicants and new hires shall be reviewed semiannually to assure that sufficient numbers are applying for jobs and to assure that the selection process is not adversely impacting the County's ability to meet its EEO program goals.
4. All employees engaged in rendering hiring and promotion decisions shall be trained to assure nondiscrimination in decision-making. The hiring and promotion results shall be reviewed periodically to ensure that nondiscrimination is a fact. Annually, those in hiring- and termination-level positions shall confirm their knowledge of EEO Program goals through participation in a training class and/or an electronic or hard-copy signature acknowledging their understanding.
5. Information collected for EEO purposes only, regarding applicants who have protected group membership, shall be maintained in a file separate from applications.
6. The Lee County EEO Officer will coordinate semiannually with the LeeTran Director and the Lee County Human Resources Office to review underutilization, review current EEO goals and statistics on employment practices and policies, and promote the EEO Program with hiring managers and externally.
7. Promotional opportunities, where any issue of unequal consideration or opportunity arises, shall be reviewed by the Office of Human Resources to assure that qualified applicants are given equal consideration and opportunities for upgrades, promotions, and transfers.
8. Where additional training and experience would be helpful for advancement, LeeTran and Human Resources will coordinate appropriate options to counsel and assist employees.
9. It is necessary for good working relationships to continue between the County and the community to inform the protected groups of the employment opportunities.
10. The appraisal of equal employment opportunity efforts and results, along with other important criteria, will be factored into the employee's job performance results and satisfactory outcomes.
11. Exit interviews shall be requested and conducted when employment ends for any reason. Any comments regarding EEO will be documented and provided to the Lee County EEO Officer and as related specifically to LeeTran, provided to the Transit Director while maintaining any necessary employee confidentiality guidelines.



Reporting will be maintained to allow for review of LeeTran's EEO Program performance throughout the year to determine where, if any, corrective actions may be needed. For LeeTran to assess its objective of achieving, within a reasonable period, an employment profile with respect to protected groups in each job category, a systematic approach must be taken to monitor the results of the EEO Program. The internal reporting completed by the Lee County EEO Officer in coordination with Human Resources and/or personnel designated by the LeeTran Director shall be completed annually and will include tracking of the following information related to protected classes:

- Permanent full-time employees;
- Permanent part-time employees;
- Permanent full-time employees grouped by occupational category and salary level;
- New hires;
- Promotions;
- Training opportunities and training completed;
- Disciplinary actions;
- Annual evaluations;
- Any management level employee not accomplishing the EEO goals as identified through review of their performance; and,
- Any EEO complaints received, whether or not they are substantiated.



Complaints

It shall be the objective of LeeTran to resolve issues of discrimination, disparate treatment, and/or harassment in an informal manner by involving the immediate supervisor and/or the Lee County EEO Officer, as deemed appropriate. The Lee County EEO Officer is responsible for mediating complaints of discrimination at the early stages by counseling employees in matters of discrimination in employment, disparate treatment, adverse impact, sexual harassment, and the like, and by advising or assisting management in the complaint resolution process before a formal grievance is filed by an employee. Formal complaint procedures have been established and are communicated so that any employee may elevate a complaint for review if they believe the informal process is not successfully addressing their discrimination, disparate impact, or harassment concerns. The Complaint Resolution Procedure outlined in Table 8 may also be utilized. However, employees are informed that nothing in LeeTran’s EEO Program’s informal or formal processes prevents an employee from initiating a discrimination complaint, at any time, with any civil rights agency, nor are time limits for such agencies waived by any of the County’s procedures or EEO policies.

Complaints are handled on a case-by-case basis, and variations in complexity will impact the time it takes to complete an investigation and recommend a course of action. The reporting system will provide documentation to support actions that affect applicants or employees from protected groups. Management will be informed of program effectiveness.

Between January 2018 and October 2021, no EEO complaints were received by LeeTran.

Table 8: Complaint Resolution Procedure

Responsibility	Step	Action
Complainant	Report complaint of alleged unlawful discriminatory act, disparate treatment, or harassment.	
Lee County EEO Officer	Review complaint and determine if additional action is required.	
Lee County EEO Officer	Consult County Attorney for review of complaint and determination of whether EEO Officer’s decision on next steps are appropriate.	
Lee County EEO Officer	If determined that additional action is warranted, conduct an investigation and consult with any impacted or participatory party to resolve complaint, documenting all steps taken.	
Lee County EEO Officer	Provide human resources with recommendations for review.	
Human Resources	Review EEO Officer’s recommendations and take next steps, as appropriate and consistent with Lee County EEO, Harassment, Age, and Disciplinary policies.	



Subrecipients/Contractors

It shall be the objective of LeeTran to ensure that all its subrecipients and contractors who meet the FTA threshold requirements are in full compliance with all Equal Employment Opportunity statutes and regulations. This refers to any subrecipient/contractor who:

1. Employs 100 or more transit-related employees; and,
2. Requests or receives capital or operating assistance more than \$1 million in the previous federal fiscal year, or requests or receives planning assistance in excess of \$250,000 in the previous federal fiscal year.

LeeTran will request and review the EEO program of each subrecipient and contractor. In addition, records of all subrecipients/contractors will be maintained documenting the name, address, type of services provided, contract work performed, correspondence regarding their EEO program, and proof of review (letter or memo to the subrecipient/contractor), as well as the date of review.

Currently LeeTran subrecipients and subcontractors do not meet the FTA threshold requirements to implement the EEO program elements.



APPENDIX A

LEETRAN UTILIZATION ANALYSIS
AND
LEE COUNTY EEO UTILIZATION REPORT

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
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	Multi	W	AI/AN	B	H/L	A	NHOPI	Multi
3	1 - Officials & Administrators																				
4	Current Workforce	(\$149,000-\$149,000)	1	0	1	0	0			1		-	-	-	-	-	-	-	-	-	-
5	Percent in Category	^Entry			100.0%			0.0%	0.0%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
6	Percent of Availability							47.2%	0.0%	1.9%	5.4%	0.7%	0.0%	0.9%	34.6%	0.1%	2.5%	5.4%	1.0%	0.0%	0.3%
9	Percent Underutilized																				
10	Underutilized (Yes/No)																				
11	Number Needed to Reach Parity									No	No	No	No	No	No	No	No	No	No	No	No
12	Planned percent increase Year 1									-	-	-	-	-	-	-	-	-	-	-	-
13	Planned percent increase Year 2																				
14	Planned percent increase Year 3																				
15	Planned percent increase Year 4																				
16																					
17	2 - Professionals																				
18	Current Workforce	(\$41,000-\$96,000)	19	3	4	6	6	3	-	1	2	1	-	-	6	-	4	1	1	-	-
19	Percent in Category	^Entry		15.8%	21.1%	31.6%	31.6%	15.8%	0.0%	5.3%	10.5%	5.3%	0.0%	0.0%	31.6%	0.0%	21.1%	5.3%	5.3%	0.0%	0.0%
20	Percent of Availability							30.0%	0.0%	2.6%	4.9%	1.1%	0.0%	0.5%	45.4%	0.0%	4.2%	8.3%	1.8%	0.0%	1.2%
23	Percent Underutilized														14%			3%			
24	Underutilized (Yes/No)									No	No	No	No	No	Yes	No	No	No	No	No	No
25	Number Needed to Reach Parity									-	-	-	-	-	2	-	-	-	-	-	-
26	Planned percent increase Year 1																				
27	Planned percent increase Year 2																				
28	Planned percent increase Year 3																				
29	Planned percent increase Year 4																				
30																					
31	3 - Technicians																				
32	Current Workforce	(\$33,000-\$64,000)	17	9	4	1	3	9		1	2	-	-	1	1	-	1	2	-	-	-
33	Percent in Category	^Entry		52.9%	23.5%	5.9%	17.6%	52.9%	0.0%	5.9%	11.8%	0.0%	0.0%	5.9%	5.9%	0.0%	5.9%	11.8%	0.0%	0.0%	0.0%
34	Percent of Availability							31.2%	0.0%	4.0%	11.4%	0.8%	0.0%	0.5%	32.5%	0.2%	7.0%	11.2%	0.7%	0.0%	0.5%
37	Percent Underutilized														27%		1%				
38	Underutilized (Yes/No)									No	No	No	No	No	Yes	No	No	No	No	No	No
39	Number Needed to Reach Parity									-	-	-	-	-	4	-	-	-	-	-	-
40	Planned percent increase Year 1																				
41	Planned percent increase Year 2																				
42	Planned percent increase Year 3																				
43	Planned percent increase Year 4																				
44																					

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
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	Multi	W	AI/AN	B	H/L	A	NHOPI	Multi
45	4 - Protective Service																				
46	Current Workforce		0	0	0	0	0				-		-	-	-	-	-	-	-	-	-
47	Percent in Category	^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%
48	Percent of Availability							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%
51	Percent Underutilized																				
52	Underutilized (Yes/No)								No	No	No	No	No	No	No	No	No	No	No	No	No
53	Number Needed to Reach Parity								-	-	-	-	-	-	-	-	-	-	-	-	-
54	Planned percent increase Year 1																				
55	Planned percent increase Year 2																				
56	Planned percent increase Year 3																				
57	Planned percent increase Year 4																				
58																					
59	5 - Paraprofessional																				
60	Current Workforce	(\$34,000-\$68,000)	20	12	4	1	3	12	-	-	4	-	-	-	1	-	2	-	-	-	1
61	Percent in Category	^Entry		60.0%	20.0%	5.0%	15.0%	60.0%	0.0%	0.0%	20.0%	0.0%	0.0%	0.0%	5.0%	0.0%	10.0%	0.0%	0.0%	0.0%	5.0%
62	Percent of Availability							33.6%	0.1%	4.0%	12.7%	0.7%	0.0%	0.0%	48.1%	0.1%	4.5%	9.4%	1.0%	0.0%	0.0%
65	Percent Underutilized														43%			9%			
66	Underutilized (Yes/No)								No	No	No	No	No	No	Yes	No	No	Yes	No	No	No
67	Number Needed to Reach Parity								-	-	-	-	-	-	8	-	-	1	-	-	-
68	Planned percent increase Year 1																				
69	Planned percent increase Year 2																				
70	Planned percent increase Year 3																				
71	Planned percent increase Year 4																				
72																					
73	6 - Administrative Support																				
74	Current Workforce	(\$36,000-\$60,000)	12	5	0	4	3	5	-	-	-	-	-	-	4	-	1	2	-	-	-
75	Percent in Category	^Entry		41.7%		33.3%	25.0%	41.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	33.3%	0.0%	8.3%	16.7%	0.0%	0.0%	0.0%
76	Percent of Availability							26.2%	0.2%	2.5%	5.5%	0.4%	0.0%	0.9%	45.3%	0.1%	5.1%	11.8%	1.0%	0.0%	1.0%
79	Percent Underutilized														12%						
80	Underutilized (Yes/No)								No	No	No	No	No	No	Yes	No	No	No	No	No	No
81	Number Needed to Reach Parity								-	-	-	-	-	-	1	-	-	-	-	-	-
82	Planned percent increase Year 1																				
83	Planned percent increase Year 2																				
84	Planned percent increase Year 3																				
85	Planned percent increase Year 4																				
86																					

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
1	Job Category	Salary Range	Total Workforce					Male							Female						
2	Use EEO-4	(\$XX,000-XX,000)	All	WM	MM	WF	MF	W	AI/AN	B	H/L	A	NHOPI	Multi	W	AI/AN	B	H/L	A	NHOPI	Multi
87	7 - Skilled Craft																				
88	Current Workforce	(\$56,000-\$75,000)	6	6	0	0	0	6	-	-	-	-	-	-	-	-	-	-	-	-	-
89	Percent in Category	^Entry		100.0%				100.0%	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%
90	Percent of Availability							52.8%	0.1%	4.9%	35.1%	0.4%	0.0%	0.8%	3.7%	0.0%	0.4%	1.6%	0.1%	0.0%	0.1%
93	Percent Underutilized										35%										
94	Underutilized (Yes/No)								No	No	Yes	No	No	No	No	No	No	No	No	No	No
95	Number Needed to Reach Parity								-	-	2	-	-	-	-	-	-	-	-	-	-
96	Planned percent increase Year 1																				
97	Planned percent increase Year 2																				
98	Planned percent increase Year 3																				
99	Planned percent increase Year 4																				
100																					
101	8 - Service-Maintenance																				
102	Current Workforce	(\$28,000-\$49,000)	206	75	78	27	26	75	1	37	37	1	-	2	27		17	8		-	1
103	Percent in Category	^Entry		36.4%	37.9%	13.1%	12.6%	36.4%	0.5%	18.0%	18.0%	0.5%	0.0%	1.0%	13.1%	0.0%	8.3%	3.9%	0.0%	0.0%	0.5%
104	Percent of Availability							29.1%	0.0%	6.7%	20.0%	1.0%	0.0%	0.9%	23.3%	0.1%	5.5%	12.1%	0.9%	0.0%	0.4%
107	Percent Underutilized										2%	1%			10%			8%	1%		
108	Underutilized (Yes/No)								No	No	Yes	Yes	No	No	Yes	No	No	Yes	Yes	No	No
109	Number Needed to Reach Parity								-	-	4	1	-	-	20	-	-	16	1	-	-
110	Planned percent increase Year 1																				
111	Planned percent increase Year 2																				
112	Planned percent increase Year 3																				
113	Planned percent increase Year 4																				
114																					
115	Notes: LeeTran workforce is based on employment records as of November 3, 2021. Workforce availability is based on 2014 to 2018 5-year ACS data.																				
116																					
117																					
118																					

EEO Utilization Report

Organization Information

Name: Lee County Board Of County Commissioners

City: Fort Myers

State: FL

Zip: 33901

Type: County/Municipal Government (not law enforcement)

Step 1: Introductory Information

Policy Statement:

It is the policy of Lee County BoCC to provide equal opportunity in employment to all employees and applicants for employment. No person is to be discriminated against in any and all terms, conditions and privileges of employment as defined by local, state and federal laws, rules or regulations based upon race, sex, religious belief, color, national origin, ancestry, disability, age or any other category of protected persons.

Following File has been uploaded:201 Equal Employment Opportunity.pdf

Step 4b: Narrative of Interpretation

Lee County Human Resources Compliance & Investigation Partner reviewed the Utilization Analysis (comparing the County's workforce with the relevant labor market), and noted the following:

1. Hispanic or Latino males were significantly underutilized in the job category Skilled Craft (-15%)
2. White females were significantly underutilized in the following job categories: Officials/Administrators (-14%), Professionals (-7%), Technicians (-13%) and Service/Maintenance (-16%).
3. Hispanic or Latino females were significantly underutilized in the job category Service/Maintenance (-7%)
4. Black or African American females were significantly underutilized in the job category Technicians (-8%)

When compared to the 2017 EEOP, improvement in utilization was noted in the following:

1. Hispanic or Latino males increased by 6% in the Officials/Administrators category bringing them to 2% above CLS, and by 3% in the Skilled Craft category and have been removed from the Significantly Underutilized list for Service Maintenance category.
2. Black or African American males increased by 3% in the Official/Administrator category bringing them to 2% above CLS.

In 2018, Lee County finalized a classification review/study for every County position resulting in the reclassification of a large number of our positions. This reclassification has, in part, impacted the EEOP statistics. The next review in 2021 will provide a better indication of the effectiveness of our Objectives and Steps. With this in mind, Lee County will continue with the formulated Objectives and Steps below to continue to improve in all utilization statistics.

Step 5: Objectives and Steps

1. 1. To encourage increased application for all underutilized categories while maintaining effective utilization where it currently exists, Lee County will increase communication of employment opportunities by:

- a. continuing to attend a diverse array of local job fairs such as the Hispanic Chamber of Commerce Job Fair;
- b. meeting with Career Counselors of local Technical Schools, Colleges and Universities and providing them with a list of County position classifications along with a link to the associated position descriptions and vacancy postings;
- c. utilizing our County Libraries as well as Parks and Recreation facilities located throughout Lee County (the relevant labor market) to provide equal access to information about available positions;
- d. meeting with minority organizations such as the Hispanic Chamber of Commerce, the Lee County NAACP, Southwest Florida Dress for Success, as well as College and University Diversity and Inclusion Councils and providing to them a list of County position classifications along with a link to the associated position descriptions and vacancy postings
- e. Human Resources Talent Acquisition staff will review the applicant pool for positions that have shown significant underutilization for the specific race/gender groups noted above to determine if these groups were under-represented in the applicant pool. Based on the findings of their review, the Talent Acquisition staff will create a recruitment plan for implementation within six months to improve participation by under-represented groups

Step 6: Internal Dissemination

- 1) A copy of this EEOP will be on file in Human Resources.
- 2) A copy of this EEOP will be provided to Lee County's Administration Department.
- 3) A copy of this EEOP will be provided to the Chairman of the Lee County Board of County Commissioners.
- 4) A copy of this EEOP will be posted on the Lee County Intranet.
- 5) A copy of this EEOP will be provided to all Department Directors.

Step 7: External Dissemination

- 1) A copy of this EEOP will be posted on the Lee County public website.
- 2) A link to this EEOP will be placed on the Lee County public Job Vacancies website page.
- 3) A copy of this EEOP will be provided to members of the public upon request.

Requests may be made via phone at 239-533-2245 and via e-mail to oeo@leegov.com.

Utilization Analysis Chart
Relevant Labor Market: Lee County, Florida

Job Categories	Male							Female								
	White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Asian	Native Hawaiian or Other Pacific Islander	Two or More Races	Other	White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Asian	Native Hawaiian or Other Pacific Islander	Two or More Races	Other
Officials/Administrators																
Workforce #/%	62/59%	8/8%	4/4%	0/0%	0/0%	1/1%	1/1%	2/2%	19/18%	2/2%	3/3%	0/0%	0/0%	0/0%	0/0%	3/3%
CLS #/%	15,055/54%	1,550/6%	390/1%	35/0%	115/0%	0/0%	124/0%	8,885/32%	910/3%	495/2%	40/0%	120/0%	0/0%	65/0%	15/0%	
Utilization #/%	5%	2%	2%	-0%	-0%	1%	1%	-14%	-1%	1%	-0%	-0%	0%	-0%	3%	
Professionals																
Workforce #/%	271/35%	42/5%	12/2%	0/0%	6/1%	0/0%	5/1%	331/42%	44/6%	35/4%	1/0%	7/1%	0/0%	7/1%	15/2%	
CLS #/%	10,695/33%	785/2%	515/2%	0/0%	500/2%	0/0%	100/0%	16,110/50%	1,715/5%	1,175/4%	45/0%	440/1%	0/0%	165/1%	75/0%	
Utilization #/%	2%	3%	-0%	0%	-1%	0%	0%	-7%	0%	1%	-0%	-0%	0%	0%	2%	
Technicians																
Workforce #/%	300/43%	78/11%	18/3%	3/0%	1/0%	0/0%	10/1%	211/31%	38/6%	8/1%	1/0%	2/0%	0/0%	8/1%	5/1%	
CLS #/%	1,965/30%	360/5%	175/3%	0/0%	4/0%	0/0%	0/0%	2,825/43%	455/7%	585/9%	0/0%	110/2%	0/0%	30/0%	10/0%	
Utilization #/%	13%	6%	-0%	0%	0%	0%	1%	-13%	-1%	-8%	0%	-1%	0%	1%	1%	
Protective Services: Sworn																
Workforce #/%	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	
CLS #/%	3,740/66%	505/9%	265/5%	0/0%	60/1%	0/0%	130/2%	770/14%	60/1%	130/2%	0/0%	15/0%	0/0%	0/0%	0/0%	
Utilization #/%																
Protective Services: Non-sworn																
Workforce #/%	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	0/	
Civilian Labor Force #/%	235/44%	25/5%	65/12%	0/0%	0/0%	0/0%	0/0%	180/34%	24/5%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%	
Utilization #/%																
Administrative Support																
Workforce #/%	30/16%	1/1%	2/1%	0/0%	1/1%	0/0%	0/0%	116/62%	21/11%	6/3%	1/1%	1/1%	0/0%	3/2%	3/2%	
CLS #/%	21,070/28%	3,295/4%	1,305/2%	80/0%	425/1%	80/0%	70/0%	36,675/50%	7,090/10%	3,115/4%	45/0%	330/0%	0/0%	155/0%	235/0%	

Job Categories	Male							Female								
	White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Asian	Native Hawaiian or Other Pacific Islander	Two or More Races	Other	White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Asian	Native Hawaiian or Other Pacific Islander	Two or More Races	Other
	%	%	%	%	%	%	%	%	%	%	%	%	%	%	%	%
Utilization #/%	-12%	-4%	-1%	-0%	-0%	0%	-0%	0%	13%	2%	-1%	0%	0%	0%	1%	1%
Skilled Craft																
Workforce #/%	285/78%	44/12%	15/4%	6/2%	1/0%	0/0%	5/1%	2/1%	7/2%	2/1%	0/0%	0/0%	0/0%	0/0%	0/0%	0/0%
CLS #/%	17,970/60%	8,160/27%	1,565/5%	80/0%	100/0%	0/0%	110/0%	170/1%	1,190/4%	405/1%	125/0%	0/0%	20/0%	0/0%	0/0%	0/0%
Utilization #/%	18%	-15%	-1%	1%	-0%	0%	1%	-0%	-2%	-1%	-0%	0%	-0%	0%	0%	0%
Service/Maintenance																
Workforce #/%	192/52%	57/15%	42/11%	5/1%	1/0%	0/0%	4/1%	0/0%	39/11%	9/2%	18/5%	0/0%	0/0%	0/0%	2/1%	1/0%
CLS #/%	20,145/32%	11,555/18%	2,985/5%	25/0%	630/1%	0/0%	170/0%	270/0%	16,655/26%	5,820/9%	3,790/6%	50/0%	615/1%	15/0%	205/0%	195/0%
Utilization #/%	20%	-3%	7%	1%	-1%	0%	1%	-0%	-16%	-7%	-1%	-0%	-1%	-0%	0%	-0%

Significant Underutilization Chart

Job Categories	Male							Female								
	White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Asian	Native Hawaiian or Other Pacific Islander	Two or More Races	Other	White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Asian	Native Hawaiian or Other Pacific Islander	Two or More Races	Other
Officials/Administrators									✓							
Professionals									✓							
Technicians									✓		✓		✓			
Administrative Support	✓	✓														
Skilled Craft		✓							✓							
Service/Maintenance									✓	✓						



APPENDIX B

EMPLOYMENT PRACTICES ASSESSMENT

**Employment Practices Assessment by Job Category
HIRES**

LEETRAN EEO PROGRAM UPDATE 2022

Job Category (Use EEO-4)	Total		W		A/I/AN		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	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Hires	1	-	-	-	-	-	1	-	-	-	-	-	-	-	-	-
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
2 - Professionals																
Number Applied	51	48	24	27	-	-	17	11	8	8	2	1	-	-	-	1
Total Hires	5	5	3	3	-	-	-	1	1	1	1	-	-	-	-	-
Selection Rate	9.8%	10.4%	12.5%	11.1%	N/A	N/A	0.0%	9.1%	12.5%	12.5%	50.0%	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	94.1%	100.0%	25.0%	22.2%	N/A	N/A	0.0%	18.2%	25.0%	25.0%	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	Yes	Yes	No	N/A	N/A	N/A	N/A	N/A
3 - Technicians																
Number Applied	73	92	37	45	5	-	14	28	15	12	-	-	-	-	2	7
Total Hires	8	3	4	1	-	-	1	1	2	1	-	-	-	-	1	-
Selection Rate	11.0%	3.3%	10.8%	2.2%	0.0%	N/A	7.1%	3.6%	13.3%	8.3%	N/A	N/A	N/A	N/A	N/A	0.0%
Ratio to Highest Rate	100.0%	29.8%	81.1%	16.7%	0.0%	N/A	53.6%	26.8%	100.0%	62.5%	N/A	N/A	N/A	N/A	N/A	0.0%
Potential Adverse Impact (Yes/No)	No	Yes	No	Yes	Yes	N/A	Yes	Yes	No	Yes	N/A	N/A	N/A	N/A	N/A	Yes
4 - Protective Service																
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
5 - Paraprofessional																
Number Applied	55	36	29	21	-	-	19	7	5	7	-	-	-	-	2	1
Total Hires	3	4	3	1	-	-	-	2	-	-	-	-	-	-	-	1
Selection Rate	5.5%	11.1%	10.3%	4.8%	N/A	N/A	0.0%	28.6%	0.0%	0.0%	N/A	N/A	N/A	N/A	0.0%	N/A
Ratio to Highest Rate	49.1%	100.0%	36.2%	16.7%	N/A	N/A	0.0%	100.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	0.0%	N/A
Potential Adverse Impact (Yes/No)	Yes	No	Yes	Yes	N/A	N/A	Yes	No	Yes	Yes	N/A	N/A	N/A	N/A	Yes	N/A
6 - Administrative Support																
Number Applied	46	103	26	57	1	-	7	19	9	19	1	2	-	-	2	6
Total Hires	1	3	1	2	-	-	-	-	-	1	-	-	-	-	-	-
Selection Rate	2.2%	2.9%	3.8%	3.5%	N/A	N/A	0.0%	0.0%	0.0%	5.3%	N/A	N/A	N/A	N/A	N/A	0.0%
Ratio to Highest Rate	74.6%	100.0%	73.1%	66.7%	N/A	N/A	0.0%	0.0%	0.0%	100.0%	N/A	N/A	N/A	N/A	N/A	0.0%
Potential Adverse Impact (Yes/No)	Yes	No	Yes	Yes	N/A	N/A	Yes	Yes	Yes	No	N/A	N/A	N/A	N/A	N/A	Yes
7 - Skilled Craft																
Number Applied	29	4	23	2	1	-	2	1	2	-	-	-	-	-	1	1
Total Hires	2	-	2	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	6.9%	0.0%	8.7%	0.0%	0.0%	N/A	0.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	N/A	0.0%	0.0%
Ratio to Highest Rate	100.0%	NA	100.0%	0.0%	0.0%	N/A	0.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	N/A	0.0%	0.0%
Potential Adverse Impact (Yes/No)	No	No	No	Yes	Yes	N/A	Yes	Yes	Yes	N/A	N/A	N/A	N/A	N/A	Yes	Yes

**Employment Practices Assessment 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
8 -Service-Maintenance																
Number Applied	344	218	196	68	3	2	77	98	60	34	-	-	-	-	8	16
Total Hires	66	33	30	15	-	-	15	14	19	3	-	-	-	-	2	1
Selection Rate	19.2%	15.1%	15.3%	22.1%	N/A	N/A	19.5%	14.3%	31.7%	8.8%	N/A	N/A	N/A	N/A	N/A	6.3%
Ratio to Highest Rate	100.0%	78.9%	48.3%	69.7%	N/A	N/A	61.5%	45.1%	100.0%	27.9%	N/A	N/A	N/A	N/A	N/A	19.7%
Potential Adverse Impact (Yes/No)	No	Yes	Yes	Yes	N/A	N/A	Yes	Yes	No	Yes	N/A	N/A	N/A	N/A	N/A	Yes

Notes: Applicant and Hire data is from January 2018 – December 2021

Job Category	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
Persons with Disabilities																
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																
Number Applied	15	5	10	5	-	-	4	-	1	-	-	-	-	-	-	-
Total Hires	2	-	2	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	13.3%	0.0%	20.0%	0.0%	N/A	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Notes: Applicant and Hire data is from July 2021 – October 2021

**Employment Practices Assessment by Job Category
PROMOTIONS**

LEETRAN EEO PROGRAM UPDATE 2022

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
1 - Officials & Administrators																
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
2 - Professionals																
Number Applied	7	12	3	6	-	-	1	4	2	1	1	1	-	-	-	-
Total Promotions	-	4	-	1	-	-	-	3	-	-	-	-	-	-	-	-
Selection Rate	0.0%	33.3%	0.0%	16.7%	N/A	N/A	0.0%	75.0%	0.0%	0.0%	0.0%	0.0%	N/A	N/A	N/A	N/A
Ratio to Highest Rate	NA	100.0%	0.0%	22.2%	N/A	N/A	0.0%	100.0%	0.0%	0.0%	0.0%	0.0%	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	Yes	Yes	N/A	N/A	Yes	No	Yes	Yes	Yes	Yes	N/A	N/A	N/A	N/A
3 - Technicians																
Number Applied	13	4	9	1	-	-	1	1	2	2	-	-	-	-	1	-
Total Promotions	3	1	1	1	-	-	1	-	1	-	-	-	-	-	-	-
Selection Rate	23.1%	25.0%	11.1%	100.0%	N/A	N/A	100.0%	0.0%	50.0%	0.0%	N/A	N/A	N/A	N/A	0.0%	N/A
Ratio to Highest Rate	92.3%	100.0%	11.1%	100.0%	N/A	N/A	100.0%	0.0%	50.0%	0.0%	N/A	N/A	N/A	N/A	0.0%	N/A
Potential Adverse Impact (Yes/No)	No	No	Yes	No	N/A	N/A	No	Yes	Yes	Yes	N/A	N/A	N/A	N/A	Yes	N/A
4 - Protective Service																
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
5 - Paraprofessional																
Number Applied	16	3	12	1	-	-	-	2	4	-	-	-	-	-	-	-
Total Promotions	2	3	1	1	-	-	1	2	-	-	-	-	-	-	-	-
Selection Rate	12.5%	100.0%	8.3%	100.0%	N/A	N/A	N/A	100.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	12.5%	100.0%	8.3%	100.0%	N/A	N/A	N/A	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	No	N/A	N/A	N/A	No	Yes	N/A	N/A	N/A	N/A	N/A	N/A	N/A
6 - Administrative Support																
Number Applied	5	7	5	4	-	-	-	1	-	2	-	-	-	-	-	-
Total Promotions	2	6	2	3	-	-	-	1	-	1	-	-	-	-	-	1
Selection Rate	40.0%	85.7%	40.0%	75.0%	N/A	N/A	N/A	100.0%	N/A	50.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	46.7%	100.0%	40.0%	75.0%	N/A	N/A	N/A	100.0%	N/A	50.0%	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	N/A	No	N/A	Yes	N/A	N/A	N/A	N/A	N/A	N/A
7 - Skilled Craft																
Number Applied	6	-	6	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Promotions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	0.0%	N/A	0.0%	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	NA	N/A	#DIV/0!	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)	No	N/A	#DIV/0!	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

**Employment Practices Assessment 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
8 -Service-Maintenance																
Number Applied	153	53	75	27	1	-	37	17	37	8	1	-	-	-	2	1
Total Promotions	7	3	4	-	-	-	-	2	3	1	-	-	-	-	-	-
Selection Rate	4.6%	5.7%	5.3%	0.0%	N/A	N/A	0.0%	11.8%	8.1%	12.5%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	80.8%	100.0%	42.7%	0.0%	N/A	N/A	0.0%	94.1%	64.9%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	Yes	Yes	N/A	N/A	Yes	No	Yes	No	N/A	N/A	N/A	N/A	N/A	N/A

Notes: Promotion data is from January 2018 – December 2021. Total workforce data as of November 2021 is used in-lieu of promotion applicants.

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
Persons with Disabilities																
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																
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: Employee promotions were not identified for Persons with Disabilities or Veterans between July 2021 – October 2021

**Employment Practices Assessment 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
1 - Officials & Administrators																
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
2 - Professionals																
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
3 - Technicians																
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
4 - Protective Service																
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

**Employment Practices Assessment 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	-	-					-	-	-	-	-	-	-	-	-	-
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
7 - Skilled Craft																
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
8 -Service-Maintenance																
Total Workforce	153	53	75	27	1	-	37	17	37	8	1	-	-	-	2	1
Total Involuntary Terminations	5	4	3	3	-	-	2	-	-	1	-	-	-	-	-	-
Involuntary Termination Rate	3.3%	7.5%	4.0%	11.1%	N/A	N/A	5.4%	0.0%	0.0%	12.5%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	43.3%	0.0%	0.0%	N/A	N/A	0.0%	100.0%	100.0%	0.0%	N/A	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	No	No	N/A	N/A	N/A	N/A	N/A	N/A

Notes: Termination data is from January 2018 – December 2021

**Employment Practices Assessment by Job Category
DISCIPLINARY ACTIONS**

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
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	0.0%	0.0%	0.0%	0.0%	N/A	N/A	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	100.0%	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)	No	No	No	No	N/A	N/A	No	No	No	No	No	No	N/A	N/A	N/A	N/A
3 - Technicians																
Total Workforce	13	4	9	1	-	-	1	1	2	2	-	-	-	-	1	-
Suspension w/o Pay	1	-	1	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	14.3%	0.0%	11.1%	0.0%	N/A	N/A	0.0%	0.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	0.0%	N/A
Ratio to Lowest Rate	0.0%	100.0%	0.0%	100.0%	N/A	N/A	100.0%	100.0%	100.0%	100.0%	N/A	N/A	N/A	N/A	100.0%	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	No	No	No	N/A	N/A	N/A	N/A	No	N/A
Coach and Counsel	5	3	5	2	-	-	-	1	-	-	-	-	-	-	-	-
Discipline Rate	71.4%	25.0%	55.6%	200.0%	N/A	N/A	0.0%	100.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	0.0%	N/A
Ratio to Lowest Rate	35.0%	100.0%	0.0%	0.0%	N/A	N/A	100.0%	0.0%	100.0%	100.0%	N/A	N/A	N/A	N/A	100.0%	N/A
Potential Adverse Impact (Yes/No)	No	No	Yes	Yes	N/A	N/A	No	Yes	No	No	N/A	N/A	N/A	N/A	No	N/A
Warning	4	-	4	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	57.1%	0.0%	44.4%	0.0%	N/A	N/A	0.0%	0.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	0.0%	N/A
Ratio to Lowest Rate	0.0%	100.0%	0.0%	100.0%	N/A	N/A	100.0%	100.0%	100.0%	100.0%	N/A	N/A	N/A	N/A	100.0%	N/A
Potential Adverse Impact (Yes/No)	Yes	No	Yes	No	N/A	N/A	No	No	No	No	N/A	N/A	N/A	N/A	No	N/A
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	0.0%	0.0%	0.0%	0.0%	N/A	N/A	0.0%	0.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	0.0%	N/A
Ratio to Lowest Rate	100.0%	100.0%	100.0%	100.0%	N/A	N/A	100.0%	100.0%	100.0%	100.0%	N/A	N/A	N/A	N/A	100.0%	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	No	No	No	N/A	N/A	N/A	N/A	No	N/A
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	0.0%	0.0%	0.0%	0.0%	N/A	N/A	0.0%	0.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	0.0%	N/A
Ratio to Lowest Rate	100.0%	100.0%	100.0%	100.0%	N/A	N/A	100.0%	100.0%	100.0%	100.0%	N/A	N/A	N/A	N/A	100.0%	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	No	No	No	N/A	N/A	N/A	N/A	No	N/A
4 - Protective Service																
Total Workforce	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline 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
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline 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
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline 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
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline 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

**Employment Practices Assessment by Job Category
DISCIPLINARY ACTIONS**

LEETRAN EEO PROGRAM UPDATE 2022

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
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline 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
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline 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
5 - Paraprofessional																
Total Workforce	16	3	12	1	-	-	-	2	4	-	-	-	-	-	-	-
Suspension w/ Pay	2	-	1	-	-	-	-	-	-	-	1	-	-	-	-	-
Discipline Rate	12.5%	0.0%	8.3%	0.0%	N/A	N/A	N/A	0.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	0.0%	100.0%	0.0%	100.0%	N/A	N/A	N/A	100.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	N/A	No	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Coach and Counsel	2	-	1	-	-	-	-	-	1	-	-	-	-	-	-	-
Discipline Rate	12.5%	0.0%	8.3%	0.0%	N/A	N/A	N/A	0.0%	25.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	0.0%	100.0%	0.0%	100.0%	N/A	N/A	N/A	100.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	N/A	No	Yes	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Warning	3	-	1	-	-	-	1	-	1	-	-	-	-	-	-	-
Discipline Rate	18.8%	0.0%	8.3%	0.0%	N/A	N/A	N/A	0.0%	25.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	0.0%	100.0%	0.0%	100.0%	N/A	N/A	N/A	100.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	N/A	No	Yes	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Termination	2	-	1	-	-	-	-	-	1	-	-	-	-	-	-	-
Discipline Rate	12.5%	0.0%	8.3%	0.0%	N/A	N/A	N/A	0.0%	25.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	0.0%	100.0%	0.0%	100.0%	N/A	N/A	N/A	100.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	N/A	No	Yes	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Other	2	-	2	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	12.5%	0.0%	16.7%	0.0%	N/A	N/A	N/A	0.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	0.0%	100.0%	0.0%	100.0%	N/A	N/A	N/A	100.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	N/A	No	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	0.0%	0.0%	0.0%	0.0%	N/A	N/A	N/A	0.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	100.0%	100.0%	100.0%	N/A	N/A	N/A	100.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	N/A	No	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A
6 - Administrative Support																
Total Workforce	5	7	5	4	-	-	-	1	-	2	-	-	-	-	-	-
Coach and Counsel	-	3	-	3	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	0.0%	42.9%	0.0%	75.0%	N/A	N/A	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	0.0%	100.0%	0.0%	N/A	N/A	N/A	100.0%	N/A	100.0%	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	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A
Warning	-	3	-	3	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	0.0%	42.9%	0.0%	75.0%	N/A	N/A	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	0.0%	100.0%	0.0%	N/A	N/A	N/A	100.0%	N/A	100.0%	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	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	0.0%	0.0%	0.0%	0.0%	N/A	N/A	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	100.0%	100.0%	100.0%	N/A	N/A	N/A	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A

**Employment Practices Assessment by Job Category
DISCIPLINARY ACTIONS**

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
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	0.0%	0.0%	0.0%	0.0%	N/A	N/A	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	100.0%	100.0%	100.0%	N/A	N/A	N/A	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	0.0%	0.0%	0.0%	0.0%	N/A	N/A	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	100.0%	100.0%	100.0%	N/A	N/A	N/A	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	0.0%	0.0%	0.0%	0.0%	N/A	N/A	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	100.0%	100.0%	100.0%	N/A	N/A	N/A	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A
7 - Skilled Craft																
Total Workforce	6	-	6	-	-	-	-	-	-	-	-	-	-	-	-	-
Suspension w/o Pay	2	-	2	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	33.3%	N/A	33.3%	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	100.0%	N/A	100.0%	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)	No	N/A	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
Warning	3	-	3	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	50.0%	N/A	50.0%	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	100.0%	N/A	100.0%	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)	No	N/A	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
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	0.0%	N/A	0.0%	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	100.0%	N/A	100.0%	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)	No	N/A	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
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	0.0%	N/A	0.0%	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	100.0%	N/A	100.0%	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)	No	N/A	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
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	0.0%	N/A	0.0%	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	100.0%	N/A	100.0%	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)	No	N/A	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
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	0.0%	N/A	0.0%	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	100.0%	N/A	100.0%	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)	No	N/A	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
8 -Service-Maintenance																
Total Workforce	153	53	75	27	1	-	37	17	37	8	1	-	-	-	2	1
Suspension w/o Pay	51	15	25	6	-	-	14	7	12	2	-	-	-	-	-	-
Discipline Rate	33.3%	28.3%	33.3%	22.2%	N/A	N/A	37.8%	41.2%	32.4%	25.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	84.9%	100.0%	66.7%	100.0%	N/A	N/A	58.7%	54.0%	68.5%	88.9%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	Yes	Yes	No	No	N/A	N/A	N/A	N/A	N/A	N/A
Coach and Counsel	48	22	31	9	-	-	8	6	9	7	-	-	-	-	-	-
Discipline Rate	31.4%	41.5%	41.3%	33.3%	N/A	N/A	21.6%	35.3%	24.3%	87.5%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	75.6%	52.3%	64.9%	N/A	N/A	100.0%	61.3%	88.9%	24.7%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	Yes	No	N/A	N/A	No	No	No	Yes	N/A	N/A	N/A	N/A	N/A	N/A

**Employment Practices Assessment by Job Category
DISCIPLINARY ACTIONS**

LEETRAN EEO PROGRAM UPDATE 2022

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
Warning	98	40	51	14	-	-	25	21	22	5	-	-	-	-	-	-
Discipline Rate	64.1%	75.5%	68.0%	51.9%	N/A	N/A	67.6%	123.5%	59.5%	62.5%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	84.9%	76.3%	100.0%	N/A	N/A	76.7%	42.0%	87.2%	83.0%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	Yes	No	N/A	N/A	Yes	Yes	No	No	N/A	N/A	N/A	N/A	N/A	N/A
Termination	5	1	4	1	-	-	1	-	-	-	-	-	-	-	-	-
Discipline Rate	3.3%	1.9%	5.3%	3.7%	N/A	N/A	2.7%	0.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	57.7%	100.0%	0.0%	0.0%	N/A	N/A	0.0%	100.0%	100.0%	100.0%	N/A	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	No	No	N/A	N/A	N/A	N/A	N/A	N/A
Last Chance Agreement	-	1	-	-	-	-	-	1	-	-	-	-	-	-	-	-
Discipline Rate	0.0%	1.9%	0.0%	0.0%	N/A	N/A	0.0%	5.9%	0.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	0.0%	100.0%	100.0%	N/A	N/A	100.0%	0.0%	100.0%	100.0%	N/A	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	No	No	N/A	N/A	N/A	N/A	N/A	N/A
Memo of Expectation	2	2	1	1	-	-	1	1	-	-	-	-	-	-	-	-
Discipline Rate	1.3%	3.8%	1.3%	3.7%	N/A	N/A	2.7%	5.9%	0.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	34.6%	0.0%	0.0%	N/A	N/A	0.0%	0.0%	100.0%	100.0%	N/A	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	No	No	N/A	N/A	N/A	N/A	N/A	N/A

**Employment Practices Assessment by Job Category
DISCIPLINARY ACTIONS**

LEETRAN EEO PROGRAM UPDATE 2022

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
Performance Improvement Plan	2	-	1				1					-	-	-	-	-
Discipline Rate	1.3%	0.0%	1.3%	0.0%	N/A	N/A	2.7%	0.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	0.0%	100.0%	0.0%	100.0%	N/A	N/A	0.0%	100.0%	100.0%	100.0%	N/A	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	No	No	N/A	N/A	N/A	N/A	N/A	N/A
Probationary Separation	4	3	1	2			1	1	2			-	-	-	-	-
Discipline Rate	2.6%	5.7%	1.3%	7.4%	N/A	N/A	2.7%	5.9%	5.4%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	46.2%	0.0%	0.0%	N/A	N/A	0.0%	0.0%	0.0%	100.0%	N/A	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	No	No	N/A	N/A	N/A	N/A	N/A	N/A
Voluntary Resignation	1	2		1			1	1					-	-	-	-
Discipline Rate	0.7%	3.8%	0.0%	3.7%	N/A	N/A	2.7%	5.9%	0.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	17.3%	100.0%	0.0%	N/A	N/A	0.0%	0.0%	100.0%	100.0%	N/A	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	No	No	N/A	N/A	N/A	N/A	N/A	N/A
<Enter Discipline Type>	-	-											-	-	-	-
Discipline Rate	0.0%	0.0%	0.0%	0.0%	N/A	N/A	0.0%	0.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	100.0%	100.0%	100.0%	N/A	N/A	100.0%	100.0%	100.0%	100.0%	N/A	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	No	No	N/A	N/A	N/A	N/A	N/A	N/A
<Enter Discipline Type>	-	-											-	-	-	-
Discipline Rate	0.0%	0.0%	0.0%	0.0%	N/A	N/A	0.0%	0.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	100.0%	100.0%	100.0%	N/A	N/A	100.0%	100.0%	100.0%	100.0%	N/A	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	No	No	N/A	N/A	N/A	N/A	N/A	N/A

Notes: Disciplinary Action data is from January 2018 – December 2021



APPENDIX C

LEETRAN'S CURRENT WORKFORCE

Hourly Rate	EEO-4 Job Category	Race	Gender	Job Title
13.54	08-ServiceMaint	White	Female	Maintenance Specialist
13.54	08-ServiceMaint	Black or African American	Male	Maintenance Specialist
13.54	08-ServiceMaint	Hispanic or Latino	Male	Maintenance Specialist
13.94	08-ServiceMaint	Hispanic or Latino	Female	Maintenance Specialist
14.79	08-ServiceMaint	Hispanic or Latino	Male	Maintenance Specialist
15.00	08-ServiceMaint	White	Female	Bus Operator
15.00	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
15.00	08-ServiceMaint	White	Male	Bus Operator
15.00	08-ServiceMaint	Black or African American	Male	Bus Operator
15.00	08-ServiceMaint	White	Male	Bus Operator
15.00	08-ServiceMaint	Black or African American	Female	Bus Operator
15.24	08-ServiceMaint	White	Male	Maintenance Specialist
15.60	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
15.60	08-ServiceMaint	White	Male	Bus Operator
15.60	08-ServiceMaint	White	Male	Bus Operator
15.60	08-ServiceMaint	White	Female	Bus Operator
15.60	08-ServiceMaint	Black or African American	Male	Bus Operator
15.60	08-ServiceMaint	White	Male	Bus Operator
15.60	08-ServiceMaint	White	Male	Bus Operator
15.60	08-ServiceMaint	Black or African American	Female	Bus Operator
15.60	08-ServiceMaint	White	Male	Bus Operator
15.60	08-ServiceMaint	White	Female	Bus Operator
15.60	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
15.60	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
15.60	08-ServiceMaint	White	Male	Bus Operator
15.60	08-ServiceMaint	White	Male	Bus Operator
15.60	08-ServiceMaint	Black or African American	Male	Bus Operator
15.60	08-ServiceMaint	White	Male	Bus Operator
15.60	08-ServiceMaint	Black or African American	Male	Bus Operator
15.60	08-ServiceMaint	Two or more races	Male	Bus Operator
15.60	08-ServiceMaint	Black or African American	Female	Bus Operator
15.60	08-ServiceMaint	White	Male	Bus Operator
15.60	08-ServiceMaint	Two or more races	Female	Bus Operator
15.60	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
15.60	08-ServiceMaint	White	Male	Bus Operator
15.60	08-ServiceMaint	Hispanic or Latino	Female	Bus Operator
15.60	08-ServiceMaint	Black or African American	Female	Bus Operator
15.60	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
15.60	08-ServiceMaint	White	Male	Bus Operator
15.60	08-ServiceMaint	White	Female	Bus Operator
15.60	08-ServiceMaint	White	Female	Bus Operator
15.60	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
15.60	08-ServiceMaint	White	Male	Bus Operator
15.60	08-ServiceMaint	Black or African American	Male	Bus Operator
15.60	08-ServiceMaint	White	Female	Bus Operator
15.60	08-ServiceMaint	Black or African American	Female	Bus Operator
15.60	08-ServiceMaint	Black or African American	Male	Bus Operator
15.60	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
15.60	08-ServiceMaint	Black or African American	Female	Bus Operator
15.60	08-ServiceMaint	White	Female	Bus Operator
15.60	08-ServiceMaint	Black or African American	Male	Bus Operator
15.60	08-ServiceMaint	White	Male	Bus Operator
15.60	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
15.60	08-ServiceMaint	Black or African American	Female	Bus Operator
15.91	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
15.91	08-ServiceMaint	White	Male	Bus Operator
15.91	08-ServiceMaint	White	Male	Bus Operator
15.91	08-ServiceMaint	Black or African American	Female	Bus Operator
15.91	08-ServiceMaint	White	Female	Bus Operator
15.91	08-ServiceMaint	White	Female	Bus Operator
15.91	08-ServiceMaint	White	Male	Bus Operator
15.91	08-ServiceMaint	White	Female	Bus Operator
15.91	08-ServiceMaint	White	Female	Bus Operator
15.91	08-ServiceMaint	Black or African American	Male	Bus Operator
15.91	08-ServiceMaint	Black or African American	Male	Bus Operator
15.91	08-ServiceMaint	Black or African American	Male	Bus Operator

Hourly Rate	EEO-4 Job Category	Race	Gender	Job Title
15.91	08-ServiceMaint	Black or African American	Female	Bus Operator
16.02	03-Technicians	Hispanic or Latino	Male	Customer Service Specialist
16.02	03-Technicians	Black or African American	Female	Customer Service Specialist
16.02	03-Technicians	Hispanic or Latino	Female	Customer Service Specialist
16.12	05-ParaProfessional	White	Male	Supply and Inventory Specialist
16.23	08-ServiceMaint	White	Male	Bus Operator
16.23	08-ServiceMaint	Black or African American	Male	Bus Operator
16.23	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
16.23	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
16.23	08-ServiceMaint	White	Male	Bus Operator
16.23	08-ServiceMaint	White	Female	Bus Operator
16.23	08-ServiceMaint	White	Male	Bus Operator
16.23	08-ServiceMaint	White	Male	Bus Operator
16.23	08-ServiceMaint	White	Male	Bus Operator
16.23	08-ServiceMaint	Black or African American	Female	Bus Operator
16.23	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
16.23	08-ServiceMaint	White	Male	Bus Operator
16.23	08-ServiceMaint	Black or African American	Female	Bus Operator
16.23	08-ServiceMaint	Black or African American	Male	Bus Operator
16.23	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
16.23	08-ServiceMaint	Two or more races	Male	Bus Operator
16.23	08-ServiceMaint	White	Male	Bus Operator
16.23	08-ServiceMaint	White	Female	Bus Operator
16.23	08-ServiceMaint	White	Male	Bus Operator
16.23	08-ServiceMaint	White	Female	Bus Operator
16.23	08-ServiceMaint	White	Male	Bus Operator
16.23	08-ServiceMaint	Black or African American	Female	Bus Operator
16.50	05-ParaProfessional	White	Male	Supply and Inventory Specialist
16.56	08-ServiceMaint	White	Male	Bus Operator
16.56	08-ServiceMaint	White	Female	Bus Operator
16.56	08-ServiceMaint	White	Male	Bus Operator
16.56	08-ServiceMaint	White	Female	Bus Operator
16.56	08-ServiceMaint	Hispanic or Latino	Female	Bus Operator
16.56	08-ServiceMaint	Black or African American	Male	Bus Operator
16.56	08-ServiceMaint	White	Male	Bus Operator
16.56	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
16.56	08-ServiceMaint	Black or African American	Male	Bus Operator
16.56	08-ServiceMaint	Black or African American	Female	Bus Operator
16.56	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
16.56	08-ServiceMaint	Black or African American	Male	Bus Operator
16.89	08-ServiceMaint	Black or African American	Female	Bus Operator
16.89	08-ServiceMaint	White	Male	Bus Operator
16.89	08-ServiceMaint	White	Male	Bus Operator
16.89	08-ServiceMaint	White	Male	Bus Operator
16.89	08-ServiceMaint	White	Male	Bus Operator
16.89	08-ServiceMaint	White	Male	Bus Operator
16.89	08-ServiceMaint	White	Female	Bus Operator
16.89	08-ServiceMaint	White	Male	Bus Operator
16.89	08-ServiceMaint	Black or African American	Male	Bus Operator
16.89	08-ServiceMaint	Black or African American	Male	Bus Operator
17.23	08-ServiceMaint	Black or African American	Male	Bus Operator
17.23	08-ServiceMaint	Black or African American	Male	Bus Operator
17.23	08-ServiceMaint	White	Female	Bus Operator
17.23	08-ServiceMaint	Native American or Alaska Native	Male	Bus Operator
17.23	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
17.23	08-ServiceMaint	White	Female	Bus Operator
17.23	08-ServiceMaint	White	Male	Bus Operator
17.23	08-ServiceMaint	Black or African American	Male	Bus Operator
17.23	08-ServiceMaint	Hispanic or Latino	Female	Bus Operator
17.23	08-ServiceMaint	White	Female	Bus Operator
17.23	08-ServiceMaint	Black or African American	Male	Bus Operator
17.23	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
17.23	08-ServiceMaint	White	Male	Bus Operator
17.23	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
17.23	08-ServiceMaint	White	Male	Bus Operator

Hourly Rate	EEO-4 Job Category	Race	Gender	Job Title
17.23	08-ServiceMaint	White	Male	Bus Operator
17.23	08-ServiceMaint	Black or African American	Male	Bus Operator
17.23	08-ServiceMaint	White	Male	Bus Operator
17.23	08-ServiceMaint	Hispanic or Latino	Female	Bus Operator
17.23	08-ServiceMaint	White	Male	Bus Operator
17.23	08-ServiceMaint	White	Male	Bus Operator
17.23	08-ServiceMaint	White	Male	Bus Operator
17.41	06-AdminSupport	White	Male	Administrative Specialist
17.50	03-Technicians	White	Male	Customer Service Specialist
17.50	03-Technicians	White	Female	Customer Service Specialist
17.57	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
17.57	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
17.57	08-ServiceMaint	White	Female	Bus Operator
17.57	08-ServiceMaint	White	Male	Bus Operator
17.57	08-ServiceMaint	White	Female	Bus Operator
17.57	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
17.57	08-ServiceMaint	White	Male	Bus Operator
17.57	08-ServiceMaint	White	Female	Bus Operator
17.57	08-ServiceMaint	White	Male	Bus Operator
17.57	08-ServiceMaint	Black or African American	Male	Bus Operator
17.57	08-ServiceMaint	White	Male	Bus Operator
17.57	08-ServiceMaint	White	Male	Bus Operator
17.57	08-ServiceMaint	White	Female	Bus Operator
17.57	08-ServiceMaint	White	Male	Bus Operator
17.68	08-ServiceMaint	White	Male	Maintenance Specialist
17.93	06-AdminSupport	Hispanic or Latino	Female	Administrative Specialist
17.93	06-AdminSupport	Black or African American	Female	Administrative Specialist
18.03	03-Technicians	Hispanic or Latino	Female	Customer Service Specialist
18.10	08-ServiceMaint	White	Male	Bus Operator
18.10	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
18.10	08-ServiceMaint	White	Male	Bus Operator
18.10	08-ServiceMaint	Black or African American	Male	Bus Operator
18.10	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
18.10	08-ServiceMaint	White	Male	Bus Operator
18.10	08-ServiceMaint	White	Male	Bus Operator
18.10	08-ServiceMaint	White	Male	Bus Operator
18.10	08-ServiceMaint	Black or African American	Male	Bus Operator
18.10	08-ServiceMaint	Black or African American	Male	Bus Operator
18.12	08-ServiceMaint	White	Male	Bus Operator
18.18	08-ServiceMaint	Black or African American	Male	Bus Operator
18.32	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
18.65	08-ServiceMaint	Asian	Male	Bus Operator
18.69	08-ServiceMaint	Black or African American	Male	Bus Operator
18.72	06-AdminSupport	Hispanic or Latino	Female	Administrative Specialist
18.72	06-AdminSupport	White	Female	Administrative Specialist
18.75	08-ServiceMaint	White	Male	Bus Operator
19.02	06-AdminSupport	White	Male	Administrative Specialist
19.07	08-ServiceMaint	Black or African American	Male	Bus Operator
19.08	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
19.14	08-ServiceMaint	Hispanic or Latino	Female	Bus Operator
19.34	08-ServiceMaint	White	Male	Bus Operator
19.42	08-ServiceMaint	Black or African American	Male	Bus Operator
19.46	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
19.51	08-ServiceMaint	White	Male	Maintenance Specialist
19.55	03-Technicians	Two or more races	Male	Technician I
19.58	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
19.66	08-ServiceMaint	White	Male	Maintenance Specialist
19.66	08-ServiceMaint	White	Male	Bus Operator
19.66	08-ServiceMaint	Black or African American	Female	Bus Operator
19.73	08-ServiceMaint	White	Male	Bus Operator
19.76	02-Professionals	Hispanic or Latino	Female	Sales and Marketing Specialist
19.78	08-ServiceMaint	Black or African American	Male	Bus Operator
19.86	06-AdminSupport	White	Male	Administrative Specialist
19.92	08-ServiceMaint		Female	Bus Operator
19.93	05-ParaProfessional	Black or African American	Female	Supervisor, Transit
19.94	02-Professionals	White	Female	Coordinator, Human Services

Hourly Rate	EEO-4 Job Category	Race	Gender	Job Title
20.08	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
20.11	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
20.14	08-ServiceMaint	White	Male	Bus Operator
20.23	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
20.23	08-ServiceMaint	White	Male	Bus Operator
20.33	08-ServiceMaint	Black or African American	Female	Bus Operator
20.53	05-ParaProfessional	White	Male	Supervisor, Transit
20.56	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
20.58	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
20.58	08-ServiceMaint	White	Male	Bus Operator
20.62	08-ServiceMaint	White	Male	Bus Operator
20.63	08-ServiceMaint	White	Male	Bus Operator
20.64	08-ServiceMaint	Black or African American	Male	Bus Operator
20.64	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
20.69	08-ServiceMaint	Black or African American	Male	Bus Operator
20.96	05-ParaProfessional	Two or more races	Female	Fiscal Specialist
20.96	05-ParaProfessional	Black or African American	Female	Fiscal Specialist
21.03	08-ServiceMaint	White	Male	Maintenance Specialist
21.14	08-ServiceMaint	Hispanic or Latino	Female	Bus Operator
21.15	05-ParaProfessional	Hispanic or Latino	Male	Supervisor, Transit
21.44	08-ServiceMaint	Black or African American	Male	Bus Operator
21.78	05-ParaProfessional	White	Male	Supervisor, Transit
22.33	08-ServiceMaint	Hispanic or Latino	Female	Bus Operator
22.38	08-ServiceMaint	White	Male	Bus Operator
22.66	06-AdminSupport	White	Female	Administrative Specialist, Senior
22.81	02-Professionals	Asian	Female	Eligibility Specialist
23.02	08-ServiceMaint	White	Male	Bus Operator
23.02	08-ServiceMaint	White	Female	Bus Operator
23.02	08-ServiceMaint	Black or African American	Female	Bus Operator
23.02	08-ServiceMaint	Hispanic or Latino	Male	Bus Operator
23.02	08-ServiceMaint	Black or African American	Male	Bus Operator
23.02	08-ServiceMaint	Black or African American	Male	Bus Operator
23.02	08-ServiceMaint	White	Male	Bus Operator
23.17	03-Technicians	Hispanic or Latino	Male	Technician II
23.17	03-Technicians	Black or African American	Male	Technician II
23.71	08-ServiceMaint	White	Male	Bus Operator
23.87	03-Technicians	White	Male	Technician II
24.06	06-AdminSupport	White	Female	Administrative Specialist, Senior
24.28	05-ParaProfessional	White	Male	Supply and Inventory Specialist
24.96	03-Technicians	White	Male	Technician II
25.01	06-AdminSupport	White	Male	Administrative Specialist
25.28	05-ParaProfessional	Hispanic or Latino	Male	Supervisor, Transit
25.44	05-ParaProfessional	White	Female	Supervisor, Transit
25.48	03-Technicians	White	Male	Technician II
25.75	02-Professionals	Black or African American	Male	Technology Systems Specialist
26.00	03-Technicians	White	Male	Technician II
26.52	02-Professionals	Black or African American	Female	Risk Management Analyst
26.82	07-SkilledCraft	White	Male	Crew Supervisor
27.05	02-Professionals	Black or African American	Female	Fiscal Officer
27.20	05-ParaProfessional	White	Male	Supervisor, Transit
27.21	03-Technicians	White	Male	Technician II
27.23	06-AdminSupport	White	Female	Administrative Specialist, Senior
27.50	02-Professionals	Asian	Male	Planner
28.48	05-ParaProfessional	White	Male	Supervisor, Transit
28.95	06-AdminSupport	White	Male	Administrative Specialist, Senior
29.22	05-ParaProfessional	White	Male	Supervisor, Transit
29.73	05-ParaProfessional	Hispanic or Latino	Male	Supervisor, Transit
29.79	03-Technicians	White	Male	Technician II
29.80	05-ParaProfessional	White	Male	Supervisor, Transit
30.00	02-Professionals	White	Male	Business, Sports and Tourism Specialist
30.27	05-ParaProfessional	White	Male	Supervisor Senior, Transit
30.34	02-Professionals	Hispanic or Latino	Male	Planner
30.43	03-Technicians	White	Male	Technician II
30.86	03-Technicians	White	Male	Technician II
31.55	07-SkilledCraft	White	Male	Crew Supervisor
31.55	07-SkilledCraft	White	Male	Supervisor, Fleet Management

**LeeTran Current Workforce
November 3, 2021**

LEETRAN EEO PROGRAM UPDATE 2022

Hourly Rate	EEO-4 Job Category	Race	Gender	Job Title
31.69	05-ParaProfessional	Hispanic or Latino	Male	Supervisor Senior, Transit
31.83	02-Professionals	White	Female	Procurement Analyst
32.50	07-SkilledCraft	White	Male	Supervisor, Facilities Construction and Management
32.75	07-SkilledCraft	White	Male	Supervisor, Fleet Management
32.89	05-ParaProfessional	White	Male	Supervisor Senior, Transit
32.89	05-ParaProfessional	White	Male	Supervisor Senior, Transit
35.54	02-Professionals	Black or African American	Female	Fiscal Officer, Senior
36.05	02-Professionals	White	Female	Grants/Legislative Analyst
36.15	07-SkilledCraft	White	Male	Supervisor, Fleet Management
37.15	02-Professionals	White	Female	Project Manager
38.19	02-Professionals	White	Female	Planner, Senior
40.84	02-Professionals	Black or African American	Female	Fiscal Manager
41.11	02-Professionals	White	Female	Manager, Transit
43.75	02-Professionals	White	Male	Planner, Principal
45.09	02-Professionals	White	Male	Manager, Transit
46.37	02-Professionals	Hispanic or Latino	Male	Manager, Transit Operations
71.61	01-Officials	Black or African American	Male	Director



APPENDIX D

ORGANIZATIONAL CHARTS

Lee County Board of County Commissioners

County Attorney
Richard Wesch

County Manager
Roger Desjarlais

Hearing Examiner
Donna Marie Collins

Office of Communications
Betsy Clayton

Deputy County Manager
Dave Harner

Assistant County Manager/CFO
Pete Winton

Assistant County Manager
Christine Brady

Assistant County Manager
Marc Mora

Assistant County Manager
Glen Salyer

County Departments

Internal Services
Laurel Chick

Human Resources
Erin Hailstone

Information & Technology
Ashley Mason

Library
Mindi Simon

Parks & Recreation
Jesse Lavender

Public Safety
Ben Abes
Lee Mayfield

Utilities
Pam Keyes

Animal Services
Mack Young

County Lands
Robert Clemens

Facilities Construction Mgmt.
Ehab Guirguis

Fleet
Mack Young

Human & Veteran Services
Roger Mercado

Transit (LeeTran)
Robert Codie

Community Development
Dave Loveland

Economic Development
John Talmage

Performance Management

Solid Waste
Doug Whitehead

Sports Development
Jeff Mielke

Visitor & Convention Bureau
Tamara Pigott

Natural Resources
Roland Ottolini

Transportation (DOT)
Randy Cerchie

Risk Management
Mike Figueroa

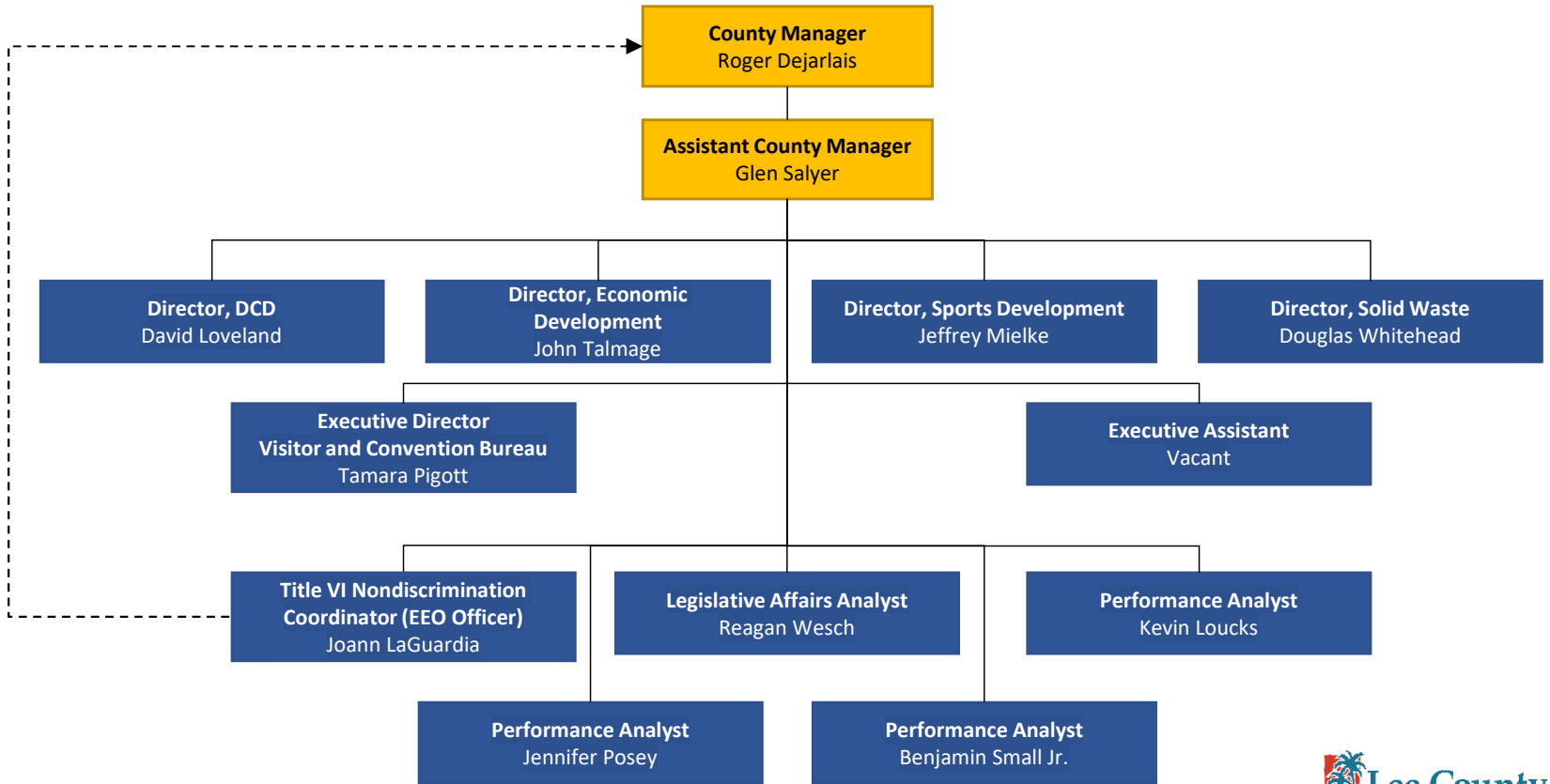
Finance, Accounting, CIP/Major Maintenance

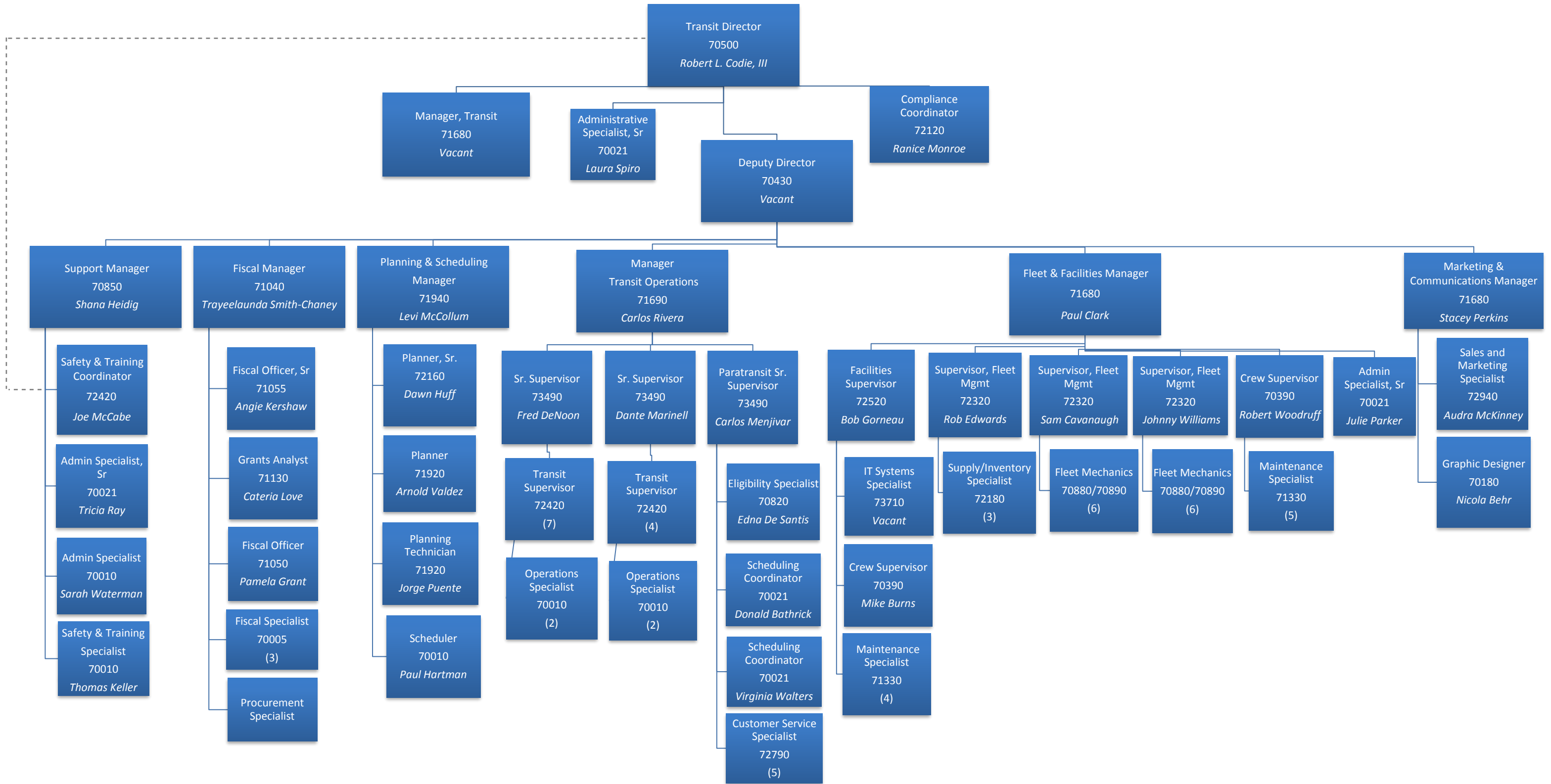
MSTU

Procurement Management
Mary Tucker

Management & Budget

Lee County Assistant County Manager's Office







APPENDIX E

GOALS AND TIMETABLES FROM LEETRAN EEO PROGRAM

MARCH 2018



EEO Program Update

2018 EEO Program Goal Achievement

2018 Goal	Timeframe for Completion	Accomplished	Comments
Coordinate with Florida Gulf Coast University (FGCU), technical schools, local colleges, and Florida's historically Black colleges and universities to distribute information on LeeTran's services and career opportunities to increase the pool of potential applicants.	Short-term	Partially	No outreach with historically Black colleges and universities was performed.
Continue to attend job fairs and other events at the Hispanic Chamber of Commerce, as available and within budget.	Short-term	Yes	
Attend job fairs and events of the Lee County NAACP, as available and within budget.	Short-term	N/A	No Lee County NAACP job fair or related activities were held during the evaluation period.
Provide employment opportunity information, including current vacancy listings as well as a listing of the various job classifications available within the County, to local minority groups, including the Hispanic Chamber of Commerce and the Lee County NAACP.	Short-term	Partially	Employment opportunity information was supplied to a variety of minority advocate organizations except to the Lee County NAACP.
Provide internal employment branding to inform all current employees of Lee County benefits to create a positive reputation in the community as a great place to work to improve applicants and retention.	Short-term	Yes	
Post jobs, as available and within budget, with the National Council of Negro Women.	Short-term	N/A	No job postings were submitted to the NCNW. The nearest chapter is located in St. Petersburg, Florida which is outside of the LeeTran labor pool.
Make available and encourage opportunities for female employees with an interest in technical positions.	Long-term	Yes	
Coordinate with local colleges, universities, and technical schools when FTA has grant programs for training in transit to increase the LeeTran applicant pool.	Long-term	Yes	



EEO Program Update

Increase overall representation of female bus operators as positions are available and qualified applications are received.	Long-term	Yes	Underutilization was reduced from 21% in 2018 to 10% in 2021.
Increase overall representation of Hispanic or Latino, Black or African American, Asian, and American Indian or Alaska Native in customer service, management, and fleet mechanic positions, or a proportionate rate of population available positions ratio, as positions are available and qualified applications are received.	Long-term	Yes	No underutilization was identified for the listed race categories in the corresponding utilization analysis job categories (i.e., Officials/Administrators and Technicians).