

ASUCD-Unitrans  
2022 Equal Employment Opportunity  
Program  
May 2022



**asucd** CITY OF DAVIS  
**UNITRANS**



**ASUCD-UNITRANS  
2022 EQUAL EMPLOYMENT OPPORTUNITY PROGRAM  
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## INTRODUCTION

On behalf of the City of Davis, ASUCD-Unitrans provides mass transportation services paid in large part by the City via pass-through of Federal Transit Administration (FTA) operating and capital assistance grants. Unitrans employs an average of 250 employees annually. Of this amount, 21 employees are “career” (non-student) staff and as such are covered in the “Affirmative Action Program for Minorities and Females” and the “Affirmative Action Plan for Veterans and Individuals with Disabilities” published annually by the University of California-Davis. The remainder of the Unitrans workforce is comprised of students hired to cover most facets of the operation, maintenance, and administration of public transit services. Because Unitrans employs more than 50 transit related employees and receives in excess of \$1 million in FTA funds annually, Unitrans is required to prepare an Equal Employment Opportunity (EEO) Program and submit the program to the City of Davis and the Federal Transit Administration (FTA) on behalf of our student workforce. For the purpose of this report, the terms “affirmative action” and “equal employment opportunity” are interchangeable.

Unitrans is a unit of the Associated Students of the University of California-Davis (ASUCD), and as such must abide by policies and commitments set forth by the University of California, Davis. This Equal Employment Opportunity (EEO) program for Unitrans fully incorporates by reference the Affirmative Action Personnel Program Plan (AAPPP) of the University.

The University’s Affirmative Action Personnel Program Plan (AAPPP) is prepared in accordance with the guidelines set forth by the U.S. Department of Labor, Office of Federal Contract Compliance Programs, and is consistent with FTA guidance as set forth in FTA Circular 4704.1.

As an active plan, the University’s AAPPP is updated annually. The workforce analysis is completed for a twelve-month period, and annual percentage placement goals are established and in effect for the Plan year coverage dates. The analysis and affirmative action goals are used by each Affirmative Action Unit and its departments, including Student Affairs/ASUCD, for all employment actions related to faculty and staff campus-wide.

As a department of the University, Unitrans shares the commitment of the University to create and maintain a community in which students, faculty, and staff can work together in an environment free of discrimination, harassment, and other artificial barriers to individual success and fulfillment. We believe that each person affiliated with the University bears a responsibility to adhere to the policy of equal opportunity and to promote Affirmative action efforts.

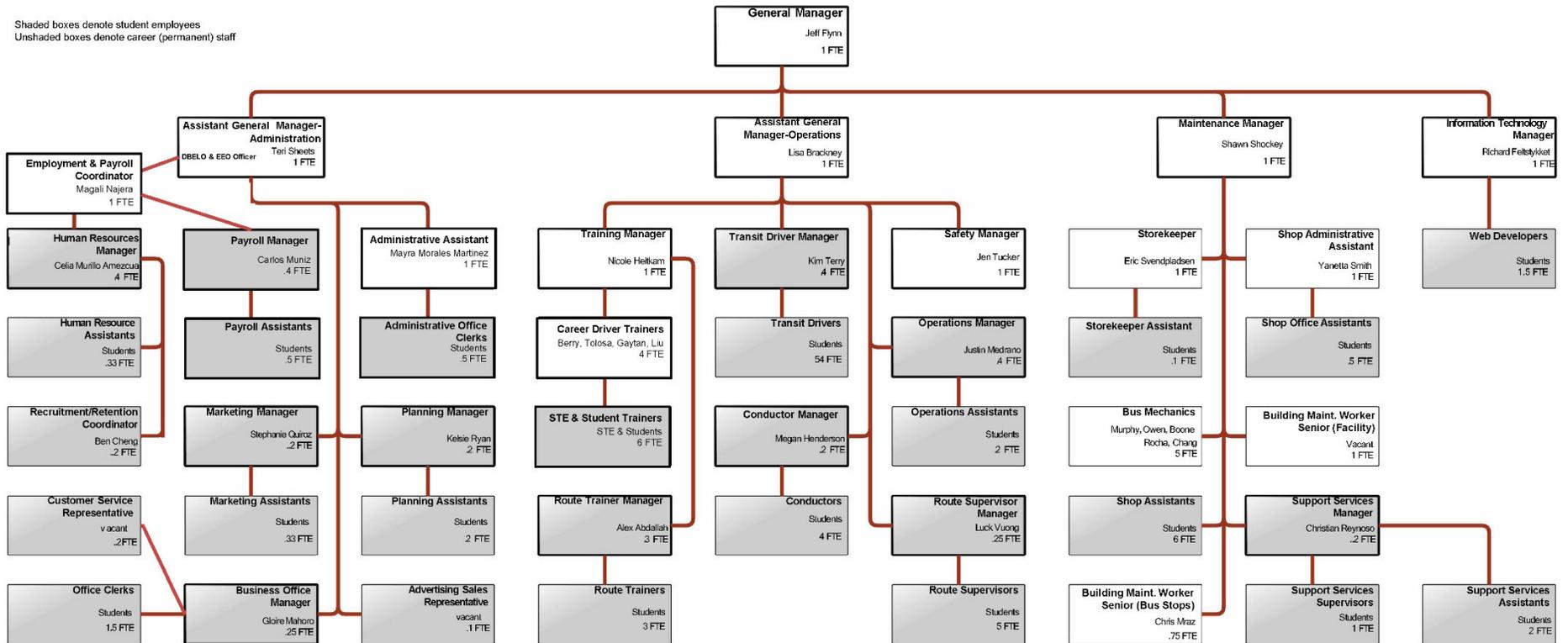
In compliance with federal and University policies, Unitrans does not discriminate on the basis of race, color, religion, national origin, sex (including gender identity, sexual orientation, and pregnancy), age, genetic information, disability, veteran status, or other protected class in any of its policies, procedures, or practices. This nondiscrimination policy includes fair treatment in all Unitrans programs and activities including the application process, employment, promotion, and termination. Unitrans is an affirmative action/equal opportunity employer.

Within Unitrans, the designated EEO Officer is the Assistant General Manager- Administration, who reports directly to the Unitrans General Manager (see Unitrans organizational chart). It is the responsibility of the EEO Officer to ensure that employee actions (including hiring, promotion, and separation) are implemented in accordance with all applicable laws, regulations, and University policy, and to disseminate Unitrans’ Statement of Policy to all employees. The EEO Officer also serves as the first point of contact to address questions or concerns that Unitrans employees may have regarding hiring, promotional, or separation decisions, identify potential employee development resources, and if necessary assist employees who wish to file a formal EEO complaint with the University. Inquiries regarding Unitrans’ implementation of equal opportunity/affirmative action policies may be directed to Teri Sheets, Assistant General Manager-Administration, ASUCD-Unitrans, 5 South Hall, (530) 752-6525, or e-mail [agma@unitrans.ucdavis.edu](mailto:agma@unitrans.ucdavis.edu).

Unitrans Organization Chart

# Unitrans Organizational Chart 2021-2022

Shaded boxes denote student employees  
 Unshaded boxes denote career (permanent) staff



ASUCD-UNITRANS  
EEO POLICY STATEMENT

Unitrans has a strong commitment to the community we serve and our employees. As an equal opportunity employer, we strive to employ a workforce that reflects the community we serve. No person is unlawfully excluded from employment opportunities based on race, color, religion, national origin, sex (including gender identity, sexual orientation, and pregnancy), age, genetic information, disability, veteran status, or other protected class.

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

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

Unitrans 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 the Unitrans General Manager, I maintain overall responsibility and accountability for ASUCD-Unitrans' compliance with its EEO Policy and Program. To ensure day-to-day management, including program preparation, monitoring, and complaint investigation, I have appointed Ms. Teri Sheets, Assistant General Manager-Administration as Unitrans' EEO Officer. Ms. Sheets reports directly to me and acts with my authority with all levels of management and employees.

Inquiries regarding Unitrans' implementation of equal opportunity/affirmative action policies may be directed to Teri Sheets, Assistant General Manager-Administration, ASUCD-Unitrans, 5 South Hall, (530) 752-6525, or e-mail [agma@unitrans.ucdavis.edu](mailto:agma@unitrans.ucdavis.edu). In addition, any employee or individual may request a copy of the EEO Program by contacting the EEO Officer.

All Unitrans management and supervisory personnel share in the responsibility for implementing and monitoring the EEO Policy and Program within their respective areas.

Unitrans is committed to undertaking and developing a written non-discrimination program that sets forth the policies, practices and procedures, with goals and timetables, to which the agency is committed and make the EEO Program available for inspection by any employee or applicant for employment upon request. I am personally committed to a workplace that acts upon its daily responsibility to treat all applicants and employees with dignity and respect, as well as equitably under the guidelines of our EEO Policy and Program.

Signature



Unitrans General Manager

5/3/2022

Date

## OBJECTIVES OF THE EEO PROGRAM

Consistent with University policy, ASUCD-Unitrans is committed to the following objectives:

- Unitrans is committed to equal employment opportunity, affirmative action, and compliance with all related laws and regulations. Unitrans policy is to provide employment, training, compensation, and other conditions or opportunities associated with employment without regard to race, color, religion, gender, national origin, genetic information (including family medical history), disability status, veteran status, or any other basis protected by law. UC Davis hires, assigns work, promotes, compensates, and retains employees only on the basis of their qualifications and performance, and our business needs.
- Unitrans is committed to engaging in good faith efforts toward improving the representation of women and minorities in all units and in all job groups where underutilization exists.
- Unitrans recognizes that commitment to equal employment opportunity and affirmative action goes beyond formal programs. Each employee has the right to be treated with dignity and respect for individual differences. Likewise, each Unitrans employee makes an important contribution to a business environment in which equal opportunity is present for all.
- Unitrans strives to provide a work environment for all employees free of harassment based on race, color, religion, national origin, sex (including gender identity, sexual orientation, and pregnancy), age, genetic information, disability, veteran status, or other protected class. protected by law.
- Unitrans personnel policies and practices are designed to ensure that each employee is accorded full consideration and opportunity, and that all policies and practices are administered without discrimination based on race, color, religion, national origin, sex (including gender identity, sexual orientation, and pregnancy), age, genetic information, disability, veteran status, or other protected class. or any other basis protected by law.
- Unitrans policy also prohibits retaliation against any employee or person seeking employment for bringing a complaint of discrimination or harassment pursuant to this policy, or against a person who assists someone with a complaint of discrimination or harassment, or who participates in any manner in an investigation or resolution of a complaint of discrimination or harassment.

### Gender Discrimination Prevention

In keeping with University policies with regard to gender and gender identity, Unitrans is committed to assuring that gender discrimination of any kind is not present in any personnel practice. Specifically, Unitrans is committed to the following:

- Assures that no job is restricted by gender. Advertisements do not list a gender preference, and state that Unitrans is an equal opportunity employer.
- Assures that personnel policies do not discriminate against employees on the basis of gender or gender identity.
- Provides equal opportunity for both all applicants and employees for any available position they are qualified to fill. Wages, hours, conditions of employment, and all other benefits are administered without regard to gender or gender identity.

- Treats persons married or unmarried equally in all personnel actions and with no distinctions based on gender or gender identity.
- Grants employees a leave as provided in policy regardless of gender and/or marital status in accordance with applicable law.
- Establishes lines of seniority and lists without regard to gender.
- Assures appropriate physical facilities for both genders, including inclusive facilities to the degree possible.
- Administers wage and compensation program equally for both genders performing duties of the same content and responsibility.
- Administers training programs without regard to gender.
- Implements policies and procedures to eliminate sexual harassment.
- Supports the University's extensive education programs on sexual violence and harassment prevention.

#### National Origin Discrimination Prevention

In keeping with the University's stated policy, Unitrans provides equal opportunity for all applicants and employees without regard to religious beliefs or national origin. The policy is available to all employees through the University's website and is posted in all Unitrans primary facilities. No employment decision is based on an individual's religion or national origin. Unitrans will make every effort to accommodate religious observances and practices of prospective employees or employees where accommodation can be accomplished without causing undue hardship on the conduct of its business.

## DISSEMINATION OF INFORMATION

### ASUCD-Unitrans Equal Employment Opportunity Program

The Unitrans Equal Employment Opportunity (EEO) statement of policy is provided on Page 5 of this document and states Unitrans' commitment to equal employment. The policy is readily available at Unitrans facilities and online.

#### Internal Dissemination

1. Internally, the EEO Policy Statement, in addition to other office EEO materials such as state labor laws, is posted at each of the primary Unitrans facilities (Unitrans Maintenance Facility and Unitrans Business Office).
2. Each student and career employee with supervisory or management responsibility receives training on Unitrans EEO policies and procedures in conjunction with annual leadership training (usually conducted during the summer) and receives refresher training throughout the academic year.
3. All new employees are informed of and have input on Unitrans EEO policies and procedures. A statement of policy and information concerning Unitrans' EEO program is included in the Unitrans employee manual and in the official hiring packet distributed to all new hires.
4. All student and career employee groups receive an update and information on the EEO program annually (typically at the fall company-wide "mandatory" meeting) and are provided an opportunity to provide feedback.

#### External Dissemination

1. Unitrans' EEO Policy Statement is posted on the [Unitrans web site](#).
2. All recruitment outreach materials, including job postings, include the statement, "ASUCD-Unitrans is an equal employment employer."

### UC Davis Affirmation Action Personnel Program Plan

Information from the UC Davis Affirmative Action Personnel Program Plan is distributed on the campus through the UC Davis Policy and Procedure Manual and personnel manuals covering academic and staff employees. To publicize the objectives of affirmative action, UC Davis takes the following steps:

#### Internal Dissemination

1. The nondiscrimination/affirmative action policy statement and the text of this Plan are made available on the University's website:
  - a. University of California Policy and Procedure Manual (PPM) 380.10 Affirmative Action in the Workplace - <https://ucdavispolicy.ellucid.com/>
  - b. UC Davis specific EEO and Affirmative Action - <https://compliance.ucdavis.edu/affirmative-action>
2. The policy statements are available to all employees through the University's website.
3. Information about the Affirmative Action Personnel Program Plan is presented at various meetings.

4. Through the campus [Diversity Education Program](#), affirmative action is explained in training and management programs related to recruitment and selection of staff and at faculty development workshops, such as the New Chairs Workshop and Search Chairs Workshop for academic searches.
5. The Plan is distributed and discussed with Academic Affirmative Action Unit Heads at annual meetings.
6. Information regarding equal employment opportunity and affirmative action is displayed on bulletin boards and other areas designated for general information.
7. UC Davis seeks input on program development and implementation through its [Campus Council on Community and Diversity \(CCC&D\)](#), which is an advisory body to the Chancellor and the Provost and Executive Vice Chancellor.

#### External Dissemination

1. An announcement that UC Davis is an equal opportunity/affirmative action employer is included on all recruitment materials, the Staff Employment Opportunities website, and general information publications made available to applicants and the general public.
2. The consolidated equal opportunity/affirmative action clause is included, either by reference or in its entirety, in all subcontracts covered by Executive Order 11246, including all contracts issued by ASUCD-Unitrans.

## DESIGNATION OF EEO RESPONSIBILITY

The responsibilities of the Unitrans EEO Officer include, but are not limited to, the following:

- Developing the EEO policy statement and a written EEO Program
- Collecting and analyzing employment data, identifying problem areas, setting goals and timetables, and developing programs to achieve goals
- Maintaining and updating the personnel database for generating reports required for the nondiscrimination program
- Designing, implementing, and monitoring internal audit and reporting systems to measure program effectiveness and to determine where progress has been made and where proactive action is needed
- Overseeing ongoing maintenance and updates of the company personnel database to generate reports required for monitoring Unitrans' success in meeting EEO goals and objectives
- Reviewing the agency's nondiscrimination plan and holding discussions with all managers and supervisors, employees, and affinity groups to ensure that the agency policies and procedures are understood and being followed
- Periodically reviewing the hiring and promotion process for consistency with the EEO Program

- In conjunction with human resources staff, periodically reviewing employment practices policies (e.g., hiring, promotions), complaint policies, and reasonable accommodation policies including periodic audits of all aspects of employment to identify and to remove barriers obstructing the achievement of specified goals and objectives
- Periodic reporting to the General Manager, senior management, and student managers on Unitrans' progress on implementation of the EEO Program, including progress toward achieving stated goals.
- Maintaining awareness of current EEO laws and regulations, and ensuring the laws and regulations affecting nondiscrimination are disseminated to responsible staff
- Investigating complaints of discrimination or harassment
- Providing EEO training for employees and managers and encouraging employee participation to support the advancement of the EEO Program
- Auditing postings of the EEO policy statement to ensure compliance information is posted and up to date

### Assignment of Responsibilities for EEO Program Implementation

All Unitrans employees are responsible for complying with both the UC Davis and Unitrans EEO and Affirmative Action programs and policies. It is the EEO Officer's responsibility to ensure that all staff and student managers/supervisors are trained on EEO hiring and employment practices, and then to assist management and supervisory staff on proper implementation. All student managers and supervisors are expected to cooperate with the EEO Officer in the process of investigating claims of discrimination or harassment. Also, student managers and supervisors are strongly encouraged to provide input and suggestions for ways to remove real or perceived barriers that may obstruct the achievement of EEO goals and objectives.

Because of the cyclical nature of Unitrans' student workforce, many student managers and supervisors do not remain in their positions long enough to allow for implementation of a regular, structured performance evaluation process. Therefore, the performance of managers and supervisors is not evaluated based on the success of the EEO Program. For this reason, the responsibility for ensuring effective implementation, review, and evaluation of the EEO Program on a consistent basis rests with the designated EEO Officer, who is a full-time, permanent staff person who reports directly to the Unitrans General Manager. Student supervisor and managers are however expected to uphold and implement EEO policies. Supervisor and managers not following EEO policies are subject to review, reinstruction, and progressive discipline procedures.

All senior management staff, who are also full-time permanent employees, receive annual performance evaluations that include a "diversity and inclusion" performance standard.

### UTILIZATION ANALYSIS

FTA requires agencies who meet the EEO Program threshold requirements to complete a utilization analysis as part of their EEO Program submission. A completed utilization analysis identifies job categories that have an underutilization or concentration of minorities and women in relation to their availability in the relevant labor market. The analysis also establishes the framework for goals and timetables to correct employment practices that contributed to any identified underutilization or concentration.

## Workforce Analysis

Student Workforce Profile: This program includes a workforce analysis to identify the Unitrans student workforce profile by gender and race/ethnicity in each job category as follows:

- Management: All student managers
- Supervisors: All student operations and support services supervisors
- Technicians: All student trainers and IT assistants
- Administrative Support: All student administrative clerks, assistants, and activity coordinators
- Maintenance: All student shop and support services assistants
- Service: All student bus drivers and conductors.

Table 3 at the end of this document shows the total number of employees and the number of male and female employees by job category and ethnicity categories as follows:

- White/Caucasian
- American Indian/Native Alaskan
- Black/African American
- Hispanic
- Native Hawaiian/Pacific Islander
- Two or more races

Unitrans' student workforce is unique in that a student may hold more than one job role at a time. For example, a student can be a bus driver, a route supervisor, and a trainer working at different times of the day or week. The workforce analysis takes into account the different job roles that individual employees may hold, resulting in a total count that is higher than the actual number of students employed by Unitrans. At the time of the analysis in summer 2021, 286 student employees hold approximately 413 job roles at Unitrans.

Student Workforce Turnover: Because only registered students at UC Davis are eligible to hold Unitrans student jobs, Unitrans experiences a very high employee turnover rate. Currently, Unitrans retains a student employee for an average of approximately 18-20 months. Generally, Unitrans experiences a complete turnover of student employees approximately every 2.5 to 3.0 years.

Student Wages: All student employees are part-time, non-exempt staff not represented by collective bargaining units. Per University of California-Davis policy, all student employees accrue sick leave but not vacation leave. For all Unitrans student positions, employees are paid the base wage rate for their respective positions, as there are no salary scales for each position. For each year of service, employees are paid an additional \$0.25/hour to the base rate. Table 2 at the end of this document contains a list of all Unitrans student job titles and wage rates.

Minimum Qualification/Experience Specifications: The majority of service, maintenance, and administrative support positions do not have minimum experience requirements. All management, supervisory, and non-IT technician positions have some minimum requirements or experience specifications consistent with their subject areas.

Training: All non-driver student employees are provided training for their positions typically through a "shadowing" process, whereby a new employee is paired with an existing employee for a period of time to learn job requirements and tasks. All employees hired as bus drivers go through an extensive training program to become licensed commercial vehicle operators.

## Availability Analysis

Per University policy, positions that are designated as student jobs must be filled by registered students with the University of California-Davis, with few exceptions approved on a case-by-case basis. All of the job roles shown in Table 2 are designated student jobs. Therefore, the “local labor market” for the purpose of this availability analysis is the population of enrolled undergraduate students at the University of California-Davis.

Table 1 shows demographic information for enrolled UCD undergraduate students as of the 2020-2021 academic year, which is the latest year for which this information is available.

## Comparing Incumbency to Availability to Establish Workforce Utilization Patterns

Table 3 shows a detailed analysis that compares Unitrans’ student workforce with the corresponding labor market data shown in Table 1 above. In accordance with FTA requirements, underutilization exists when the number of minority or female incumbents is at least one whole person lower than the number predicted by the availability percentages.

A review of Table 3 shows that the Unitrans student workforce has some imbalances in representation on both gender and ethnicity lines. The number of Unitrans female employees of Asian descent is underrepresented across all job categories except administrative roles. Unitrans has included goals and action steps in this EEO Program to achieve parity in our workforce utilization.

Note that the proportion of employees who identify as multi-racial, as a gender identity other than male or female, and declining to state their gender and/or ethnicity has increased significantly since the last program update.

| <b>Table 1<br/>Demographic Profile of Enrolled Undergraduate Students<br/>at the University of California-Davis, Fall 2020</b> |                   |             |
|--|-------------------|-------------|
| <b>By Gender</b>   | <b>Population</b> | <b>%</b>    |
| Female   | 19,016            | 61%         |
| Male   | 12,146            | 39%         |
| <b>Total</b>   | <b>31,162</b>     | <b>100%</b> |
| <b>By Race/Ethnicity</b>   | <b>Population</b> | <b>%</b>    |
| Asian/Pacific Islander   | 8,924             | 29%         |
| Black/African American   | 633               | 2%          |
| Native American/Alaskan Native   | 46                | 0%          |
| Hispanic/Latinx/Chicanx  | 7,457             | 24%         |
| White/Caucasian (not of Hispanic Origin)   | 6,674             | 21%         |
| Other/Declined to State  | 7,428             | 24%         |
| <b>Total</b>   | <b>31,162</b>     | <b>100%</b> |

## GOALS AND TIMETABLES

### 2018 Unitrans Workforce Utilization Goals

The 2018 Unitrans EEO Program identified the following workforce availability and utilization goals:

- Management – One male of Asian/Pacific Islander identity
  - Unitrans hired two Asian/Pacific Islander males into the Management group.
- Technician – Three males identifying as Asian/Pacific Islander
  - Unitrans hired seven Asian/Pacific Islander males into the Technician group
- Supervisor – Six females identifying as Asian/Pacific Islander
  - Unitrans hired three Asian/Pacific Islander females into the Supervisor group
- Administrative – One male of Asian/Pacific Islander identity
  - Unitrans hired four Asian/Pacific Islander males into the Administrative group
- Maintenance – Two females identifying as Asian/Pacific Islander
  - Unitrans hired two Asian/Pacific Islander females
- Service – 16 females identifying as Asian/Pacific Islander
  - Unitrans hired 16 Asian/Pacific Islander females into the Service group.

Unitrans performed employment outreach to our campus focused initiatives focused on our students who identify as Asian and other minorities to further engage and get more applicants. While we achieved many of our recruitment objectives, the COVID-19 pandemic significantly impacted Unitrans' ability to recruit and retain staff which has led to some staffing imbalances and shortages. Unitrans lost approximately a third of all driving staff when the COVID-19 pandemic began and has a shortage of approximately 50 drivers as of winter 2022. One hundred seventy-five drivers are needed for full, regular service. Recruitment was challenged from winter 2020 through fall 2021 as UC Davis classes were held remotely and a large portion of students was not present on campus. Recruitment activity is improving but is still below pre-pandemic levels.

### 2022 Unitrans Workforce Utilization Goals

In addition to showing workforce utilization and availability data, Table 3 also shows calculations of the numbers of individuals by gender and ethnicity that are needed to achieve a workforce that reflects the demographic profile of the UC Davis undergraduate student population. Specifically, Table 3 shows that Unitrans needs to set goals to hire at least:

- Management – One male of Hispanic/Latinx/Chicanx identity and one female of Asian/Pacific Islander identity
- Technician – Four males identifying as “Other” identity, six females identifying as Asian/Pacific Islander, and two females identifying as “Other” identity
- Supervisor – One male identifying as “Other” identity, one female identifying as Asian/Pacific Islander, and two females identifying as “Other” identity
- Administrative - Two males identifying as Hispanic/Latinx/Chicanx, three males identifying as “Other” identity, two females identifying as white, and two females identifying as “Other” identity
- Maintenance – Four females identifying as Asian/Pacific Islander
- Service – Two females identifying as Hispanic/Latinx/Chicanx and 18 females identifying as Asian/Pacific Islander

Unitrans has chosen to state utilization goals in terms of numbers rather than percentages. The frequency by which Unitrans student jobs become available lends itself to the development of recruitment goals and outreach plans that outline clear steps for outreach to organizations on campus that represent persons of all genders and ethnicities. The EEO Officer will incorporate the data showing the effectiveness of all Unitrans outreach efforts into the workforce utilization analysis to update the percentages of women and minorities by job category compared to labor market availability.

Unitrans seeks to attain reasonable goals based on the availability figure derived for women and/or minorities, as appropriate for each job group. These goals take into account the availability of basically qualified persons within our labor market area. They also take into account anticipated employment opportunities within Unitrans, which occur frequently throughout each academic year. Because of the cyclical nature of Unitrans' student employees, Unitrans recruits for administrative and maintenance positions at least twice a year. For bus operators, Unitrans recruits at least quarterly (and sometimes more frequently) based on forecasted graduation or attrition rates. Due to a large pandemic related driver shortage, Unitrans is currently continuously recruiting drivers. Management, supervisory, and technician jobs are posted at least annually, or more frequently depending on forecasted graduation rates.

Unitrans plans to reach these goals primarily through recruiting and advertising to increase the pool of qualified applicants. Every good-faith effort will be made to recruit new employees from the very diverse pool of individuals on campus, with focused efforts to reach out to cultural/ethnicity based registered student organizations on campus.

Hiring selections will occur only from among qualified applicants, keeping in mind that goals are not rigid and inflexible quotas which must be met, but are instead targets reasonably attainable by means of applying every good faith effort to ensure a diverse workforce. Goals do not require the hiring of a person when there are no vacancies. Further, goals do not require the hiring of a person who is less likely to do well on the job ("less qualified") over a person more likely to do well on the job ("better qualified"), under valid selection procedures. Goals do not require that Unitrans hire a specified number of minorities or women. However, by setting realistic goals, Unitrans will strive to meet them using effective recruitment and advertising efforts to ensure an adequate pool and qualified minority and/or female applicants.

## EMPLOYMENT PRACTICES

FTA requires agencies to document their employment practices in both narrative and statistical formats with sufficient detail to identify trends and any practices that may operate as employment barriers. Further, agencies are required to identify all problem areas and propose a program of corrective actions as part of their EEO Program.

ASUCD, Unitrans' parent department, does not collect demographic data from job applicants for any ASUCD student job due to student privacy concerns. Therefore, Unitrans does not have data on the gender and ethnic make-up of persons who applied for jobs but were not hired. The University, however, does provide demographic data for Unitrans employees, which will allow Unitrans to develop a mechanism to evaluate the success of employment practices in meeting EEO goals and objectives.

### Recruitment and Selection

All open student jobs at Unitrans are posted online at [vacancy.ucdavis.edu](http://vacancy.ucdavis.edu), which is the job portal for all open positions within the Associated Students of the University of California-Davis (ASUCD). The majority of service, maintenance, and administrative support positions do not have minimum experience requirements. All management, supervisory, and non-IT technician positions have some minimum requirements or experience specifications consistent with their subject areas.

All student job descriptions are written to accurately reflect job functions and are consistent for all employees hired into their respective job roles.

Unitrans strives to maintain balanced representation on all interview panels, which are comprised primarily by current student employees across all functional areas. Because of academic schedule

constraints, Unitrans works to schedule interview panels on days and times at which both candidates and interview panelists are available, including weekends and evenings as necessary. All interview panelists are instructed on proper interview procedures and deliberation procedures to eliminate any bias in hiring decisions. In 2020, Unitrans implemented a new requirement that all interview panelists are required to complete anti-bias training before participating on interview panels. The Unitrans Human Resources Manager or designee sits on every interview panel to ensure that all proper procedures are implemented and objective hiring decisions are made.

### Promotions and Transfers

Recruitment for all Unitrans student jobs takes place on a competitive basis, with rare exceptions made for the completion of short-term assignments on a case-by-case basis. Requests for such an exception must be approved by senior management staff, taking into account the extraordinary nature and duration of the assignment and qualifications of the individual to be appointed.

For all Unitrans jobs with minimum requirements and/or skills or previous experience specifications, Unitrans ensures that all of these job qualifications are clearly identified on the job postings and made available to all interested current and potential student employees. While Unitrans does not have a formal transfer policy, all current Unitrans employees are eligible and encouraged to apply for other Unitrans student jobs for which they meet the specified qualifications.

For Unitrans student jobs that require the accumulation of driving hours, such as training and some management positions, the Unitrans Human Resources or Operations Management staff reaches out to all employees who have accumulated the requisite driving hours to inform them of their eligibility to apply for open positions.

### Seniority Practices

Unitrans employs a seniority practice for student employees based on an employee's "lifetime hours," or for driving positions the number of an employee's "safe driving hours." Unitrans recognizes student employees at increments of 500 lifetime hours for their contributions to the company and recognizes bus drivers in increments of 500 safe driving hours for their contributions toward the company's safety-first culture.

### Training

All non-driver student employees are provided training for their positions typically through a "shadowing" process, whereby a new employee is paired with an existing employee for a period of time to learn job requirements and tasks. All employees hired as bus drivers go through an extensive training program to become licensed commercial vehicle operators.

Unitrans operates a fleet of both vintage and modern double-deck buses as part of our fixed route transit bus fleet. In order to qualify to train as a double-deck driver, student employees must have a minimum of 500 safe driving hours.

### Compensation and Benefits

All student employees are part-time, non-exempt staff not represented by collective bargaining units. Per University of California-Davis policy, all student employees accrue sick leave but not vacation leave. For all Unitrans student positions, employees are paid the base wage rate for their respective positions, as there are no salary scales for each position. For each year of service, employees are paid an additional \$0.25/hour to the base rate.

Table 2 at the end of this document contains a list of all Unitrans student job titles and wage rates.

## Progressive Discipline/Termination Procedures

All Unitrans student employees are considered casual or “at will” employees by UC Davis and therefore may be released at management’s discretion. However, because of the significant amount of initial and refresher training invested in our student employees, Unitrans management chooses to implement a progressive discipline program similar to that used by most transit agencies, thus allowing Unitrans to not only train but also coach and mentor student employees, for many of whom Unitrans may be their first employment experience. Unitrans’ objective is to develop and maintain a well-trained student workforce and provide them with skills and experience that will be valuable as they launch their careers after graduation.

Unitrans enforces a system of strikes assessed against employees for inappropriate behavior that is verifiable. Examples of such behavior include not showing up (or showing up late) for scheduled shifts, and “shift negligence” such as not properly completing required paperwork or for non-compliance with established rules and procedures. An employee is placed on “strike probation” after accruing a specified number of strikes. Employees who violate safety procedures are placed on “safety probation” for a specified amount of time. Continued violation of company rules and procedures will result in termination. Descriptions of the strike and safety probation process, including thresholds for violation, are detailed in Unitrans’ employee manuals provided to each individual.

## AGENCY MONITORING & REPORTING

### Complaint Filing and Resolution

For Unitrans, the designated EEO Officer serves as the first point of contact to address questions or concerns that Unitrans employees may have regarding hiring, promotional, or separation decisions, and to identify potential employee development resources.

Inquiries regarding Unitrans’ implementation of equal opportunity/affirmative action policies may be directed to Teri Sheets, Assistant General Manager-Administration, ASUCD-Unitrans, 5 South Hall, (530) 752-6525, or e-mail [agma@unitrans.ucdavis.edu](mailto:agma@unitrans.ucdavis.edu).

Any person who feels he, she, or they are being subjected to discriminatory or unprofessional behavior of any kind is encouraged to report the behavior either in writing or in person to his/her supervisor, Unitrans’ EEO Officer, or the General Manager. The EEO Officer will immediately initiate an investigation to ascertain the facts of the specific issue and prepare/present findings to the complainant, his/her immediate supervisor, and to appropriate senior management staff. Unitrans will endeavor to address EEO complaints as soon as practicable but in no case in excess of 30 days.

An applicant or employee who has an EEO complaint may also file their complaint with an appropriate outside agency, or pursue other legal recourse. Under federal law, a discrimination complaint must be filed with the Equal Employment Opportunity Commission (1-800-669-4000, [www.eeoc.gov](http://www.eeoc.gov)) within 180 days of the unlawful conduct (unless a state complaint has been filed, in which case the complaint must be filed within 300 days) and that a state complaint must be filed with the California Department of Fair Employment and Housing (1-800-884-1684, TIY 1-800-700-2320, [www.dfeh.ca.gov](http://www.dfeh.ca.gov)) within a year of the unlawful conduct.

Retaliation against the complainant or any other individual involved in the complaint or investigation process will not be tolerated. Anyone found to be engaged in retaliatory behavior will be subject to discipline, up to and including termination and referral to appropriate University adjudication offices.

Unitrans will maintain a log that documents the name of the complainant, basis of the complaint, the protected group, date of initial contact, date of resolution, the resolution reached, and the name of the investigator.

### Data Collection and Reporting

The EEO Officer is responsible for establishing procedures and practices to meet all EEO internal audit/reporting requirements. Unitrans currently maintains the following data/information:

- The number of new hires
- The number of employees who apply for and receive other open positions within Unitrans
- The number and types of disciplinary actions
- The number of voluntary and involuntary separations

At the present time, Unitrans does not collect or maintain gender or ethnicity data for applicants due to ASUCD policy and procedure interpretation. Because of this, Unitrans does not currently have good data on the gender and ethnicity of persons who are not hired for Unitrans job. The EEO Officer will work with employee onboarding officials with the Associated Students of the University of California-Davis (ASUCD) to create a mechanism for collecting such information that is compliant not only with federal law and FTA regulations but consistent with University policy and procedures as well.

Unitrans does not have a formal promotion or transfer policy, but employees who meet the minimum qualifications for open positions are eligible and encouraged to apply. The number of employees who do so are included in the number of employees who apply for other open positions within Unitrans.

The EEO Officer is responsible for and maintains records of the following:

- All training provided on implementation of the EEO Program, including presentation materials and agenda/sign-in sheets as appropriate
- All published job postings, ensuring that each contains the sentence, "Unitrans is an equal opportunity employer."
- The location and dates of all campus recruitment activities.
- Verification that job descriptions contain position-appropriate requirements.

### Internal Reporting

The EEO Officer is responsible for reporting the results of monitoring of all Unitrans employment actions to the General Manager, senior management staff, and student management. Past reporting has taken place but not on a regular or consistent schedule. The EEO Officer will initiate a process to prepare and present monitoring reports on an annual basis, in conjunction with the annual reporting requirement developed through agreement with the City of Davis. These reports will contain at least the following information:

- The number of applicants for each open student job
- The number of applicants selected for interviews, cross-referenced by gender and ethnicity
- The number of applicants selected for each open job, cross-referenced by gender and ethnicity
- The number of employees who have voluntarily resigned, cross referenced by gender and ethnicity
- The number of employees who have been involuntarily separated, cross referenced by gender and ethnicity.
- Unitrans' progress in meeting the recruitment/hiring goals identified in the EEO Program
- Recommendations for appropriate follow-up actions to make continued progress on EEO Program implementation

The EEO Officer reviews this information at least annually with Unitrans human resources staff (includes hiring staff) to assess current EEO goals, policies, practices, and performance.

#### Sub-Recipient Monitoring/Reporting

As the sole sub-recipient to the City of Davis, Unitrans is responsible for reporting to the City's designated EEO official on the status of implementation and monitoring of this EEO Program. Unitrans submits regular reports to the City of Davis on the status of implementation of all FTA regulatory requirements and reports as needed when specific issues arise, including complaint investigations, findings, and resolutions.

#### Union Contracts

Unitrans staff is not involved in the negotiation or development of collective bargaining agreements and has no ability to influence negotiations or possible impacts. The University of California, Davis Employee & Labor Relations department performs all collective bargaining related issues. Once collective bargaining agreements are implemented, Unitrans staff is responsible for reviewing, understanding, and implementing required provisions and ensuring employee and management compliance of collective bargaining agreements with support and oversight from Employee & Labor Relations.

**Table 2**  
**UNITRANS JOB TITLES AND PAY RATES**  
**As of 7/28/2021**

| <b>POSITION</b>                           | <b>TITLE CODE</b> | <b>BASE PAY RATE</b> | <b>EEO Category</b> |
|---|-------------------|----------------------|---------------------|
| Administrative Office Clerk (AOC)         | 4920              | \$15.50              | Administration      |
| Advertising Sales Representative          | 4921              | \$15.50              | Administration      |
| Customer Outreach Representative          | 4920              | \$16.00              | Administration      |
| Human Resources Assistant (HRA)           | 4329              | \$15.75              | Administration      |
| Marketing Design Assistant                | 4920              | \$15.75              | Administration      |
| Office Clerk (OC)                         | 4920              | \$15.25              | Administration      |
| Op. Admin. Assist. (OAA)                  | 4920              | \$15.50              | Administration      |
| Operations Assistant (OA)                 | 4920              | \$16.25              | Administration      |
| Payroll Assistant (PRA)                   | 4920              | \$16.75              | Administration      |
| Planning Assistant (PLA)                  | 4920              | \$15.75              | Administration      |
| Recruitment & Retention Coordinator       | 4920              | \$16.00              | Administration      |
| Route Supervisor Manager Assistant (RSMA) | 4920              | \$18.25              | Administration      |
| Shop Office Clerk                         | 4920              | \$15.50              | Administration      |
| Transit Driver Manager Assistant (TDMA)   | 4329              | \$15.75              | Administration      |
| Shop Assistant                            | 4920              | \$16.75              | Maintenance         |
| Support Services Assistant                | 4920              | \$16.25              | Maintenance         |
| Business Office Manager                   | 4920              | \$17.75              | Management          |
| Charter Manager                           | 4920              | \$18.25              | Management          |
| Conductor Manager                         | 4920              | \$18.25              | Management          |
| Human Resources Manager                   | 4920              | \$20.00              | Management          |
| Marketing Design Manager                  | 4920              | \$17.75              | Management          |
| Operations Manager                        | 4920              | \$20.00              | Management          |
| Payroll Manager                           | 4920              | \$18.25              | Management          |
| Route Supervisor Manager                  | 4920              | \$19.75              | Management          |
| Route Training Manager                    | 4920              | \$19.25              | Management          |
| Support Services Manager                  | 4920              | \$18.75              | Management          |
| Transit Driver Manager                    | 4920              | \$20.00              | Management          |
| Transit Planning Manager                  | 4920              | \$17.75              | Management          |
| Conductor                                 | 4921              | \$15.25              | Service             |
| Driver                                    | 4920              | \$17.25              | Service             |
| Route Supervisor (Supe)                   | 4920              | \$18.25              | Supervisor          |
| Support Services Supervisor               | 4920              | \$16.75              | Supervisor          |
| Driver Trainer (DT)                       | 4920              | \$18.25              | Technician          |
| IT Assistant                              | 4920              | \$19.25              | Technician          |
| Route Trainer (RT)                        | 4920              | \$18.00              | Technician          |



**Table 3**  
**ASUCD-Unitrans Workforce Utilization Analysis and Goals**  
 (using whole number test)

For Fiscal Year Ended June 30, 2021

| Job Category                    | Total Workforce |      |       |       |       | Male |       |      |       |       |       | Female |       |      |       |       |       |
|---------------------------------|-----------------|------|-------|-------|-------|------|-------|------|-------|-------|-------|--------|-------|------|-------|-------|-------|
|                                 | All             | WM   | MM    | WF    | MF    | W    | AI/NA | B/AA | H/L/C | As/PI | Other | W      | AI/NA | B/AA | H/L/C | As/PI | Other |
| <b>Management</b>               |                 |      |       |       |       |      |       |      |       |       |       |        |       |      |       |       |       |
| Current Workforce               | 21              | 1    | 4     | 3     | 13    | 1    | 1     | 0    | 0     | 2     | 1     | 3      | 0     | 1    | 6     | 2     | 4     |
| Percent in Category             |                 | 4.8% | 19.0% | 14.3% | 61.9% | 4.8% | 4.8%  | 0.0% | 0.0%  | 9.5%  | 4.8%  | 14.3%  | 0.0%  | 4.8% | 28.6% | 9.5%  | 19.0% |
| Percent of Availability         |                 |      |       |       |       | 8.3% | 0.1%  | 0.8% | 9.3%  | 11.2% | 9.3%  | 13.1%  | 0.1%  | 1.2% | 14.6% | 17.5% | 14.5% |
| Percent Underutilized           |                 |      |       |       |       |      |       |      | 9%    | 2%    | 5%    |        |       |      |       | 8%    |       |
| Underutilized (Yes/No)          |                 |      |       |       |       | No   | No    | Yes  | No    | No    | No    | No     | No    | No   | No    | Yes   | No    |
| Number Needed to Reach Parity   |                 |      |       |       |       | -    | -     | 1    | 0     | -     | -     | -      | -     | 0    |       | 1     |       |
| 2022 EEO Program Underutilized? |                 |      |       |       |       | No   | No    | Yes  | No    | No    | No    | No     | No    | No   | Yes   | No    |       |
| 2022-2025 EEO Program Goals     |                 |      |       |       |       |      |       |      | 1     |       |       |        |       |      |       | 1     |       |

| Job Category                    | Total Workforce |       |       |       |       | Male  |       |      |       |       |       | Female |       |      |       |       |       |
|---------------------------------|-----------------|-------|-------|-------|-------|-------|-------|------|-------|-------|-------|--------|-------|------|-------|-------|-------|
|                                 | All             | WM    | MM    | WF    | MF    | W     | AI/NA | B/AA | H/L/C | As/PI | Other | W      | AI/NA | B/AA | H/L/C | As/PI | Other |
| <b>Technician</b>               |                 |       |       |       |       |       |       |      |       |       |       |        |       |      |       |       |       |
| Current Workforce               | 46              | 6     | 13    | 11    | 16    | 6     | 0     | 0    | 5     | 8     | 0     | 11     | 0     | 0    | 10    | 2     | 4     |
| Percent in Category             |                 | 13.0% | 28.3% | 23.9% | 34.8% | 13.0% | 0.0%  | 0.0% | 10.9% | 17.4% | 0.0%  | 23.9%  | 0.0%  | 0.0% | 21.7% | 4.3%  | 8.7%  |
| Percent of Availability         |                 |       |       |       |       | 8.3%  | 0.1%  | 0.8% | 9.3%  | 11.2% | 9.3%  | 13.1%  | 0.1%  | 1.2% | 14.6% | 17.5% | 14.5% |
| Percent Underutilized           |                 |       |       |       |       |       |       |      |       |       | 9%    |        |       |      |       | 13%   | 6%    |
| Underutilized (Yes/No)          |                 |       |       |       |       | No    | No    | No   | No    | Yes   | No    | No     | No    | No   | Yes   | Yes   |       |
| Number Needed to Reach Parity   |                 |       |       |       |       | -     | -     | -    | -     | 4     | -     | -      | -     | 0    | 0     | 6     | 2     |
| 2022 EEO Program Underutilized? |                 |       |       |       |       | No    | No    | No   | No    | Yes   | No    | No     | No    | No   | Yes   | Yes   |       |
| 2022-2025 EEO Program Goals     |                 |       |       |       |       |       |       |      |       | 4     |       |        |       | -    | -     | 6     | 2     |

| Job Category                    | Total Workforce |      |       |       |       | Male |       |      |       |       |       | Female |       |      |       |       |       |
|---------------------------------|-----------------|------|-------|-------|-------|------|-------|------|-------|-------|-------|--------|-------|------|-------|-------|-------|
|                                 | All             | WM   | MM    | WF    | MF    | W    | AI/NA | B/AA | H/L/C | As/PI | Other | W      | AI/NA | B/AA | H/L/C | As/PI | Other |
| <b>Supervisor</b>               |                 |      |       |       |       |      |       |      |       |       |       |        |       |      |       |       |       |
| Current Workforce               | 28              | 2    | 11    | 5     | 10    | 2    | 1     | 1    | 4     | 4     | 1     | 5      | 0     | 0    | 5     | 3     | 2     |
| Percent in Category             |                 | 7.1% | 39.3% | 17.9% | 35.7% | 7.1% | 3.6%  | 3.6% | 14.3% | 14.3% | 3.6%  | 17.9%  | 0.0%  | 0.0% | 17.9% | 10.7% | 7.1%  |
| Percent of Availability         |                 |      |       |       |       | 8.3% | 0.1%  | 0.8% | 9.3%  | 11.2% | 9.3%  | 13.1%  | 0.1%  | 1.2% | 14.6% | 17.5% | 14.5% |
| Percent Underutilized           |                 |      |       |       |       |      |       |      |       |       | 6%    |        |       |      |       | 7%    |       |
| Underutilized (Yes/No)          |                 |      |       |       |       | No   | No    | No   | No    | Yes   | No    | No     | No    | No   | Yes   | Yes   |       |
| Number Needed to Reach Parity   |                 |      |       |       |       | -    | -     | -    | -     | 1     | -     | -      | -     | -    | 1     | 2     |       |
| 2022 EEO Program Underutilized? |                 |      |       |       |       | No   | No    | No   | No    | Yes   | No    | No     | No    | No   | Yes   | Yes   |       |
| 2022-2025 EEO Program Goals     |                 |      |       |       |       |      |       |      |       | 1     |       |        |       |      | 1     | 2     |       |

**ASUCD-Unitrans Workforce Utilization Analysis and Goals**  
(using whole number test)

For Fiscal Year Ended June 30, 2021

| Job Category                    | Total Workforce |       |       |       |       | Male  |       |      |       |       |       | Female |       |      |       |       |       |
|---------------------------------|-----------------|-------|-------|-------|-------|-------|-------|------|-------|-------|-------|--------|-------|------|-------|-------|-------|
|                                 | All             | WM    | MM    | WF    | MF    | W     | AI/NA | B/AA | H/L/C | As/PI | Other | W      | AI/NA | B/AA | H/L/C | As/PI | Other |
| <b>Administrative</b>           |                 |       |       |       |       |       |       |      |       |       |       |        |       |      |       |       |       |
| Current Workforce               | 33              | 5     | 8     | 2     | 18    | 5     | 0     | 0    | 1     | 7     | 0     | 2      | 0     | 2    | 5     | 9     | 2     |
| Percent in Category             |                 | 15.2% | 24.2% | 6.1%  | 54.5% | 15.2% | 0.0%  | 0.0% | 3.0%  | 21.2% | 0.0%  | 6.1%   | 0.0%  | 6.1% | 15.2% | 27.3% | 6.1%  |
| Percent of Availability         |                 |       |       |       |       | 8.3%  | 0.1%  | 0.8% | 9.3%  | 11.2% | 9.3%  | 13.1%  | 0.1%  | 1.2% | 14.6% | 17.5% | 14.5% |
| Percent Underutilized           |                 |       |       |       |       |       |       |      | 6%    |       | 9%    | 7%     |       |      |       |       | 8%    |
| Underutilized (Yes/No)          |                 |       |       |       |       |       | No    | No   | Yes   | No    | Yes   | Yes    | No    | No   | No    | No    | Yes   |
| Number Needed to Reach Parity   |                 |       |       |       |       |       | -     | -    | 2     | -     | 3     | 2      | -     | -    | 0     | -     | 2     |
| 2022 EEO Program Underutilized? |                 |       |       |       |       |       | No    | No   | Yes   | No    | Yes   | Yes    | No    | No   | No    | No    | Yes   |
| 2022-2025 EEO Program Goals     |                 |       |       |       |       |       |       |      | 2     |       | 3     | 2      |       |      |       |       | 2     |
| <b>Maintenance</b>              |                 |       |       |       |       |       |       |      |       |       |       |        |       |      |       |       |       |
| Job Category                    | Total Workforce |       |       |       |       | Male  |       |      |       |       |       | Female |       |      |       |       |       |
|                                 | All             | WM    | MM    | WF    | MF    | W     | AI/NA | B/AA | H/L/C | As/PI | Other | W      | AI/NA | B/AA | H/L/C | As/PI | Other |
| Current Workforce               | 35              | 2     | 18    | 4     | 11    | 2     | 0     | 0    | 8     | 4     | 6     | 4      | 0     | 0    | 3     | 3     | 5     |
| Percent in Category             |                 | 5.7%  | 51.4% | 11.4% | 31.4% | 8.3%  | 0.1%  | 0.8% | 9.3%  | 11.2% | 9.3%  | 13.1%  | 0.1%  | 1.2% | 14.6% | 17.5% | 14.5% |
| Percent of Availability         |                 |       |       |       |       | 9.0%  | 0.0%  | 1.0% | 9.0%  | 13.0% | 7.0%  | 14.0%  | 0.0%  | 2.0% | 14.0% | 20.0% | 10.0% |
| Percent Underutilized           |                 |       |       |       |       |       |       |      | 2%    |       | 1%    |        |       |      |       | 3%    |       |
| Underutilized (Yes/No)          |                 |       |       |       |       |       | No    | No   | No    | No    | No    | No     | No    | No   | No    | Yes   | No    |
| Number Needed to Reach Parity   |                 |       |       |       |       |       | -     | -    | -     | -     | -     | 0      | -     | -    | 0     | 4     | -     |
| 2022 EEO Program Underutilized? |                 |       |       |       |       |       | No    | No   | No    | No    | No    | No     | No    | No   | No    | Yes   |       |
| 2022-2025 EEO Program Goals     |                 |       |       |       |       |       |       |      |       |       |       |        |       |      |       | 4     |       |
| <b>Service</b>                  |                 |       |       |       |       |       |       |      |       |       |       |        |       |      |       |       |       |
| Job Category                    | Total Workforce |       |       |       |       | Male  |       |      |       |       |       | Female |       |      |       |       |       |
|                                 | All             | WM    | MM    | WF    | MF    | W     | AI/NA | B/AA | H/L/C | As/PI | Other | W      | AI/NA | B/AA | H/L/C | As/PI | Other |
| Current Workforce               | 215             | 22    | 75    | 28    | 90    | 22    | 1     | 3    | 20    | 27    | 24    | 28     | 0     | 3    | 29    | 19    | 39    |
| Percent in Category             |                 | 10.2% | 34.9% | 13.0% | 41.9% | 10.2% | 0.5%  | 1.4% | 9.3%  | 12.6% | ##### | 13.0%  | 0.0%  | 1.4% | 13.5% | 8.8%  | 18.1% |
| Percent of Availability         |                 |       |       |       |       | 8.3%  | 0.1%  | 0.8% | 9.3%  | 11.2% | 9.3%  | 13.1%  | 0.1%  | 1.2% | 14.6% | 17.5% | 14.5% |
| Percent Underutilized           |                 |       |       |       |       |       |       |      | 0%    |       |       | 0%     |       |      | 1%    | 9%    |       |
| Underutilized (Yes/No)          |                 |       |       |       |       |       | No    | No   | No    | No    | No    | No     | No    | No   | Yes   | Yes   | No    |
| Number Needed to Reach Parity   |                 |       |       |       |       |       | -     | 0    | 0     | 0     | 0     | 0      | 0     | 0    | 2     | 18    | -     |
| 2022 EEO Program Underutilized? |                 |       |       |       |       |       | No    | No   | No    | No    | No    | No     | No    | No   | Yes   | Yes   |       |
| 2022-2025 EEO Program Goals     |                 |       |       |       |       |       |       |      |       |       |       |        |       |      | 2     | 18    |       |

Table 4  
ASUCD-Unitrans  
EEO Program Checklist

| Sub-Recipient Name:  | ASUCD-Unitrans          |    |  |
|--|-------------------------|----|--|
| 2.2 EEO PROGRAM ELEMENTS   | Applicable to Unitrans? |    | Review Comments  |
|  | Yes                     | No |  |
| <b>STATEMENT OF POLICY–C. 4704.1A 2.2.1</b>  |                         |    |  |
| <b>Is there a written Statement of Policy by the CEO/GM:</b>   |                         |    |  |
| <b>Does the statement:</b>   |                         |    |  |
| Express the agency’s commitment that all employment actions, including but not limited to recruitment or recruitment advertising, hiring, upgrading, selection for training, promotion, transfer, demotion, layoff, termination, rates of pay or other forms of compensation, and treatment of employees will be administered without regard to race, color, religion, national origin, sex (including gender identity, sexual orientation, and pregnancy), age, genetic information, disability, veteran status, or other protected class | √                       |    | Page 5   |
| Commit to develop a written nondiscrimination program that sets forth the policies, practices, and procedures, with goals and timetables, to which the agency is committed and make the EEO Program available for inspection by any employee or applicant for employment upon request  | √                       |    | Page 5   |
| Explain that the responsibility for implementing the EEO Program is assigned to an agency executive who reports directly to the CEO/GM   | √                       |    | Page 5   |
| State that applicants and employees have the right to file complaints alleging discrimination with the EEO Officer or office   | √                       |    | Page 5   |
| State that 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   | √                       |    | Page 5   |
| State the agency’s commitment to provide reasonable accommodations to applicants and employees who need them because of a disability or to practice or observe their religion, absent undue hardship   | √                       |    | Page 5   |
| State that all management and supervisory personnel share in this responsibility and are assigned specific tasks to ensure and achieve compliance  | √                       |    | Page 5   |
| State that the agency evaluates the performance of managers, supervisors, and others based on the success of the EEO Program in the same manner that the agency evaluates their performance in other agency programs   |                         | √  | Unitrans student managers and supervisors are short-term (1-2 year) employees and are therefore not subject to performance evaluations as part of their employment. Career staff coach and mentor employees on effective EEO hiring practices. |

| Sub-Recipient Name:   | ASUCD-Unitrans          |   |                 |
|---|-------------------------|---|-----------------|
| 2.2 EEO PROGRAM ELEMENTS  | Applicable to Unitrans? |   | Review Comments |
| Provide the name and contact information for the EEO Officer  | √                       |   | Page 5          |
| Provide the Signature and Date of GM or CEO   | √                       |   | Page 5          |
| <b>DISSEMINATION—C. 4704.1A 2.2.2</b>   |                         |   |                 |
| <b>Does the dissemination section include:</b>  |                         |   |                 |
| Providing written communications from the CEO/GM (i.e., policy statement)   | √                       |   | Page 8          |
| Posting official EEO materials (e.g., Federal and state labor laws poster(s) and the agency's policy statement) on bulletin boards, near time clocks, in employees' break rooms, and in the employment/personnel office | √                       |   | Page 8          |
| Including the EEO policy statement in the agency's personnel and operations manual, employee handbooks, reports and manuals   | √                       |   | Page 8          |
| Meeting with top management officials (e.g., bus operations, human resources, planning, marketing, etc.) at a minimum semiannually to discuss the EEO Program and its implementation                                    | √                       |   | Page 8          |
| Meeting with all employees and affinity groups to seek input on the program implementation  |                         |   | Page 8          |
| Conducting periodic EEO training for all employees and for managers   | √                       |   | Page 8          |
| Conducting EEO training for all new supervisors or managers within 90 days of their appointment   | √                       |   | Page 8          |
| <b>Externally, does the agency state:</b>   |                         |   |                 |
| When there is outreach or advertising to recruitment entities (e.g., employment agencies, educational institutions, minority, and women organizations), the agency will disseminate their policy to those entities      |                         | √ | NA              |
| All recruitment ads (e.g., newspapers, magazines, websites, and social media) must state that the agency "is an equal employment opportunity employer"  | √                       |   | Page 8          |
| <b>DESIGNATION OF PERSONNEL—C. 4704.1A 2.2.3</b>  |                         |   |                 |
| <b>Do the EEO program office responsibilities include:</b>  |                         |   |                 |
| Developing the EEO policy statement and a written EEO Program   | √                       |   | Page 9          |
| Assisting management in collecting and analyzing employment data, identifying problem areas, setting goals and time tables, and developing programs to achieve goals  | √                       |   | Page 9          |
| Designing, implementing, and monitoring internal audit and reporting systems to measure program effectiveness and to determine where progress has been made and where proactive action is needed                        | √                       |   | Page 9          |
| Reviewing the agency's nondiscrimination plan with all managers and supervisors to ensure that the policy is understood   | √                       |   | Page 9          |
| Concurring in the hiring and promotion process  | √                       |   | Page 10         |

| Sub-Recipient Name:  | ASUCD-Unitrans          |   |  |
|--|-------------------------|---|--|
| 2.2 EEO PROGRAM ELEMENTS   | Applicable to Unitrans? |   | Review Comments  |
| In conjunction with human resources, periodically reviewing employment practices policies (e.g., hiring, promotions, training), complaint policies, reasonable accommodation policies, performance evaluations, grievance procedures, and union agreements | √                       |   | Page 10  |
| Reporting at least semiannually to the CEO/GM on each department's progress in relation to the agency's goals and on contractor and vendor compliance  | √                       |   | Page 10  |
| Serving as liaison between the agency, Federal, state, county, and local governments, regulatory agencies, minority, women, disability organizations, and other community groups   |                         | √ | Does not apply in the context of Unitrans' student employment base. EEO Officer does not serve as a liaison to Federal, state, and local agencies on a variety of issues, including regulatory compliance              |
| Maintaining awareness of current EEO laws, and ensuring the laws affecting nondiscrimination are disseminated to responsible officials   | √                       |   | Page 10  |
| Investigating complaints of EEO discrimination   | √                       |   | Page 10  |
| Providing EEO training for employees and managers  | √                       |   | Page 10  |
| In conjunction with human resources, advising employees and applicants of available training programs and professional development opportunities and the entrance requirements   |                         | √ | Unitrans management provides information on training/development opportunities to student employees as part of their post secondary education career development planning after they leave Unitrans and the University |
| Auditing postings of the EEO policy statement to ensure compliance information is posted and up to date  | √                       |   | Page 10  |
| <b>Do the agency officials, supervisors and managers' responsibilities include:</b>  |                         |   |  |
| Participating actively in periodic audits of all aspects of employment to identify and to remove barriers obstructing the achievement of specified goals and objectives  | √                       |   | Page 10  |
| Holding regular discussions with other managers, supervisors, employees, and affinity groups to ensure agency policies and procedures are being followed   | √                       |   | Page 10  |
| In conjunction with the EEO Officer, maintaining and updating the personnel database for generating reports required for the nondiscrimination program   | √                       |   | Page 9   |
| Cooperating with the EEO Officer in review of information and investigation of complaints  | √                       |   | Page 10  |
| Encouraging employee participation to support the advancement of the EEO Program (e.g., professional development and career growth opportunities, posting promotional opportunities, shadowing, mentoring)   | √                       |   | Page 10  |
| <b>UTILIZATION ANALYSIS—C. 4704.1A 2.2.4</b>   |                         |   |  |
| Does the work force analysis include a statistical breakdown of the recipients' workforce by each department job category?   | √                       |   | Pages 20-21  |
| Is the aforementioned cross-referenced by sex and race?  | √                       |   | Pages 20-21  |
| Is the current percent of employees for each category cross-referenced by group?   | √                       |   | Pages 20-21  |
| Is there an availability percentage identified for each category cross-referenced by group?  | √                       |   | Pages 20-21  |

| Sub-Recipient Name:   | ASUCD-Unitrans          |   |   |
|---|-------------------------|---|---|
| 2.2 EEO PROGRAM ELEMENTS  | Applicable to Unitrans? |   | Review Comments   |
| Is the percentage of underutilization for each category cross- referenced by group?   | √                       |   | Pages 20-21   |
| <b>GOALS AND TIMETABLES—C. 4704.1A 2.2.5</b>  |                         |   |   |
| Are there specific and detailed percentage and numerical goals with timetables set to correct any underutilization of specific affected classes of persons identified in the utilization analysis? There are long-term (in percentages) and short-term (numbers and percentages). | √                       |   | Page 14   |
| Are previous goals that were not met discussed and a justification given for not meeting those goals?   | √                       |   | Page 13   |
| <b>EMPLOYMENT PRACTICES—C. 4704.1A 2.2.6</b>  |                         |   |   |
| Is there a <b>detailed</b> narrative assessment of present employment practices (e.g., hiring, recruitment, training)?  | √                       |   | Page 14-16  |
| Do the analyses contain statistical data to document the impact of the employment practices by sex and race?  | √                       |   | No – Unitrans will develop a mechanism to evaluate the success of employment practices in meeting EEO goals and objectives. |
| <b>Does the statistical analysis contain:</b>   |                         |   |   |
| The number of applicants for employment in each job category and the number hired, cross-referenced by sex and race   | √                       |   | Unitrans will develop a mechanism to evaluate the success of employment practices in meeting EEO goals and objectives.      |
| The number of employees in each job category who applied for promotion or transfer and the number in each job category promoted or transferred, cross-referenced by sex and race  | √                       |   |   |
| The number and types of disciplinary actions (e.g., indefinite suspension, loss of pay, demotion), tailored to the language used in union contracts and agency policies and procedures  | √                       |   |   |
| The number of voluntary/involuntary terminations (other than graduation), cross-referenced by sex and race  | √                       |   |   |
| Individuals with Disabilities and Veterans, the number of applicants for employment and promotions in each job category and the number hired and promoted, cross-referenced by sex and race   | √                       |   |   |
| Job category training that fosters promotion potential, cross-referenced by sex and race  |                         | √ | NA  |
| <b>MONITORING AND REPORTING SYSTEMS – C.4704.1A 2.2.7</b>   |                         |   |   |
| <b>Is there a monitoring system that describes:</b>   |                         |   |   |
| Methods to monitor the EEO components identified in this chapter (e.g., dissemination, utilization analysis, statistical employment practices, timeframe to reach goals, all identified barriers and the progress of the action plan)   | √                       |   | Pages 17-18   |
| Procedures used to determine EEO compliance of subrecipients and contractors such as collection and review of their EEO Programs, visits to facilities to ensure proper posting of the EEO Policy Statement, etc.   | √                       |   | NA  |
| Procedures for reviewing union contracts, in conjunction with human resources, to ensure there is not a disparate impact  |                         | √ | Unitrans student employees are not represented by collective bargaining units.  |

| Sub-Recipient Name:   | ASUCD-Unitrans          |   |                 |
|---|-------------------------|---|-----------------|
| 2.2 EEO PROGRAM ELEMENTS  | Applicable to Unitrans? |   | Review Comments |
| Process for monitoring complaints (e.g., describe the tracking system, monitoring of trends, timeliness of investigations, resolutions, reporting to management)  | √                       |   | Page 16         |
| <b>Is there a reporting system that describes:</b>  |                         |   |                 |
| Meetings held between the CEO/GM and the EEO Officer to discuss the progress of the EEO Program and the results of the monitoring (including but not limited to, hiring, promotions, status of EEO complaints)  | √                       |   | Page 18         |
| All program EEO-related meetings held between the EEO Officer and management, including topics covered, follow-up actions   | √                       |   | Page 18         |
| EEO Officer's meetings with human resources and hiring officials to review current EEO goals and statistics on employment practices and policies (e.g., verifying that job descriptions contain legitimate position requirements and that all testing has been validated) | √                       |   | Page 18         |
| <b>REQUIRED EEO PROGRAM ATTACHMENTS</b>   |                         |   |                 |
| List of subrecipients and contractors who are being monitored and the services they provide   |                         | √ | NA              |
| Proof of review of subrecipients and contractors' EEO Program (e.g., letter or memo to the subrecipient)  |                         | √ | NA              |
| Organization chart showing the reporting relationships of all directors, department heads, and executive leadership (include names and titles)  | √                       |   | Page 4          |
| A copy of the goals and timetables from the previous program submission   | √                       |   | Page 13         |



**Table 5**  
**2018 EEO Program**  
**Workforce Utilization Goals & Timetables**

**TABLE 3**  
**ASUCD-Unitrans Workforce Utilization Analysis and Goals**  
 (Using whole number test)

| Job Category                  | Total Workforce |    |    |    |    |       | Male  |       |       |       |       |       | Female |       |      |      |       |       |       |      |
|-------------------------------|-----------------|----|----|----|----|-------|-------|-------|-------|-------|-------|-------|--------|-------|------|------|-------|-------|-------|------|
|                               | All             | WM | MM | WF | MF | W/F   | W     | A/AN  | B     | H/L   | A     | NHOPI | M/MI   | W     | A/AN | B    | H/L   | A     | NHOPI | M/MI |
| <b>1 - Management</b>         |                 |    |    |    |    |       |       |       |       |       |       |       |        |       |      |      |       |       |       |      |
| Current Workforce             | 10              | 3  | 2  | 2  | 3  | 30.0% | 30.0% | 20.0% | 20.0% | 20.0% | 0.0%  | 0.0%  | 0.0%   | 20.0% | 0.0% | 0.0% | 10.0% | 10.0% | 20.0% | 0.0% |
| Percent in Category           |                 |    |    |    |    |       |       |       |       |       |       |       |        |       |      |      |       |       |       |      |
| Percent of Availability       |                 |    |    |    |    |       | 11.0% | 0.0%  | 1.0%  | 9.0%  | 14.0% | 0.0%  | 16.0%  | 0.0%  | 0.0% | 2.0% | 12.0% | 21.0% | 0.0%  | 0.0% |
| Percent Underutilized         |                 |    |    |    |    |       |       |       |       |       | 14%   |       |        |       |      |      | 2%    |       |       |      |
| Underutilized (Yes/No)        |                 |    |    |    |    |       |       | No    | No    | No    | Yes   | No    | No     | No    | No   | No   | No    | No    | No    | No   |
| Number Needed to Reach Parity |                 |    |    |    |    |       |       |       |       |       | 1     |       |        |       |      |      |       |       |       |      |
| Planned increase 2017/2018    |                 |    |    |    |    |       |       |       |       |       |       |       |        |       |      |      |       |       |       |      |
| Planned percent 2018/2019     |                 |    |    |    |    |       |       |       |       |       |       |       |        |       |      |      |       |       |       |      |
| Planned percent 2019/2020     |                 |    |    |    |    |       |       |       |       |       |       |       |        |       |      |      |       |       |       |      |
| Planned percent 2020/2021     |                 |    |    |    |    |       |       |       |       |       |       |       |        |       |      |      |       |       |       |      |
| <b>2 - Technicians</b>        |                 |    |    |    |    |       |       |       |       |       |       |       |        |       |      |      |       |       |       |      |
| Current Workforce             | 42              | 9  | 10 | 6  | 17 | 21.4% | 23.8% | 14.3% | 4.8%  | 14.3% | 4.8%  | 0.0%  | 14.3%  | 0.0%  | 0.0% | 2.4% | 16.7% | 21.4% | 0.0%  |      |
| Percent in Category           |                 |    |    |    |    |       |       |       |       |       |       |       |        |       |      |      |       |       |       |      |
| Percent of Availability       |                 |    |    |    |    |       | 11.0% | 0.0%  | 1.0%  | 9.0%  | 14.0% | 0.0%  | 16.0%  | 0.0%  | 0.0% | 2.0% | 12.0% | 21.0% | 0.0%  | 0.0% |
| Percent Underutilized         |                 |    |    |    |    |       |       |       |       |       | 9%    |       |        |       |      |      |       |       |       |      |
| Underutilized (Yes/No)        |                 |    |    |    |    |       |       | No    | No    | No    | Yes   | No    | No     | No    | No   | No   | No    | No    | No    | No   |
| Number Needed to Reach Parity |                 |    |    |    |    |       |       |       |       |       | 3     |       |        |       |      |      |       |       |       |      |
| Planned increase 2017/2018    |                 |    |    |    |    |       |       |       |       |       |       |       |        |       |      |      |       |       |       |      |
| Planned percent 2018/2019     |                 |    |    |    |    |       |       |       |       |       |       |       |        |       |      |      |       |       |       |      |
| Planned percent 2019/2020     |                 |    |    |    |    |       |       |       |       |       |       |       |        |       |      |      |       |       |       |      |
| Planned percent 2020/2021     |                 |    |    |    |    |       |       |       |       |       |       |       |        |       |      |      |       |       |       |      |
| <b>3 - Supervisors</b>        |                 |    |    |    |    |       |       |       |       |       |       |       |        |       |      |      |       |       |       |      |
| Current Workforce             | 25              | 7  | 6  | 6  | 6  | 28.0% | 24.0% | 24.0% | 1.0%  | 12.0% | 12.0% | 0.0%  | 24.0%  | 0.0%  | 0.0% | 4.0% | 20.0% | 0.0%  | 0.0%  |      |
| Percent in Category           |                 |    |    |    |    |       |       |       |       |       |       |       |        |       |      |      |       |       |       |      |
| Percent of Availability       |                 |    |    |    |    |       | 11.0% | 0.0%  | 1.0%  | 9.0%  | 14.0% | 0.0%  | 16.0%  | 0.0%  | 0.0% | 2.0% | 12.0% | 21.0% | 0.0%  | 0.0% |
| Percent Underutilized         |                 |    |    |    |    |       |       |       |       |       | 2%    |       |        |       |      |      |       |       |       |      |
| Underutilized (Yes/No)        |                 |    |    |    |    |       |       | No    | No    | No    | No    | No    | No     | No    | No   | No   | No    | Yes   | No    | No   |
| Number Needed to Reach Parity |                 |    |    |    |    |       |       |       |       |       |       |       |        |       |      |      |       | 5     |       |      |
| Planned increase 2017/2018    |                 |    |    |    |    |       |       |       |       |       |       |       |        |       |      |      |       |       |       |      |
| Planned percent 2018/2019     |                 |    |    |    |    |       |       |       |       |       |       |       |        |       |      |      |       |       |       |      |
| Planned percent 2019/2020     |                 |    |    |    |    |       |       |       |       |       |       |       |        |       |      |      |       |       |       |      |
| Planned percent 2020/2021     |                 |    |    |    |    |       |       |       |       |       |       |       |        |       |      |      |       |       |       |      |



**APPENDIX A**  
**University of California-Davis: Affirmative Action and**  
**Equal Employment Opportunity Policy Statement**



### **A NOTICE AND INVITATION TO ALL EMPLOYEES AND APPLICANTS**

#### **AFFIRMATIVE ACTION AND EQUAL EMPLOYMENT OPPORTUNITY**

##### **POLICY STATEMENT**

UC Davis has been and will continue to be an equal opportunity employer. To assure full implementation of this equal employment policy, we will take steps to assure that:

- a. Persons are recruited, hired, assigned, and promoted without regard to race, religion, color, national origin, citizenship, sex, gender identity, sexual orientation, protected veteran status, age or disability.
- b. All other personnel actions, such as compensation, benefits, transfers, layoffs and recall from layoffs, access to training, education, tuition assistance and social recreation programs are administered without regard to race, religion, color, veteran's status, national origin, citizenship, sex, gender identity, sexual orientation, age or disability.
- c. Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion or discrimination because they have: (1) filed a complaint; (2) assisted or participated in an investigation, compliance review, hearing or any other activity related to the administration of any federal, state or local law requiring equal employment opportunity; (3) opposed any act or practice made unlawful by any federal, state or local law requiring equal opportunity or (4) exercised any other right protected by federal, state or local law requiring equal opportunity.

The University's Chief Compliance Officer, Vice Provost of Academic Affairs and Associate Vice Chancellor – Human Resources have the ultimate responsibilities of EEO Coordination under the University's affirmative action program and have further delegated those responsibilities to all managers and supervisors and Human Resources representatives across the campus. The EEO Coordinators will be responsible for the day to day implementation and monitoring of the University's affirmative action program. As part of that responsibility, the EEO Coordinators will periodically analyze the University's personnel actions and their effects to ensure compliance with our equal employment policy and administer the audit and reporting system.

If you, as one of our employees or as an applicant for employment, have any questions about this policy or would like to be considered under our affirmative action Program, please contact the EEO Coordinator during regular business hours.

UC Davis's Chancellor, Gary May endorses our Affirmative Action and Equal Employment Opportunity program. Please continue to assist and support all the University's personnel to attain our objective of equal employment opportunity for all.

## **PAY TRANSPARENCY NONDISCRIMINATION PROVISION**

The contractor will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the contractor's legal duty to furnish information. 41 CFR 60-1.35(c).

# Equal Employment Opportunity is **THE LAW**

## **Private Employers, State and Local Governments, Educational Institutions, Employment Agencies and Labor Organizations**

Applicants to and employees of most private employers, state and local governments, educational institutions, employment agencies and labor organizations are protected under Federal law from discrimination on the following bases:

### **RACE, COLOR, RELIGION, SEX, NATIONAL ORIGIN**

Title VII of the Civil Rights Act of 1964, as amended, protects applicants and employees from discrimination in hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, and other aspects of employment, on the basis of race, color, religion, sex (including pregnancy), or national origin. Religious discrimination includes failing to reasonably accommodate an employee's religious practices where the accommodation does not impose undue hardship.

### **DISABILITY**

Title I and Title V of the Americans with Disabilities Act of 1990, as amended, protect qualified individuals from discrimination on the basis of disability in hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, and other aspects of employment. Disability discrimination includes not making reasonable accommodation to the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or employee, barring undue hardship.

### **AGE**

The Age Discrimination in Employment Act of 1967, as amended, protects applicants and employees 40 years of age or older from discrimination based on age in hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, and other aspects of employment.

### **SEX (WAGES)**

In addition to sex discrimination prohibited by Title VII of the Civil Rights Act, as amended, the Equal Pay Act of 1963, as amended, prohibits sex discrimination in the payment of wages to women and men performing substantially equal work, in jobs that require equal skill, effort, and responsibility, under similar working conditions, in the same establishment.

### **GENETICS**

Title II of the Genetic Information Nondiscrimination Act of 2008 protects applicants and employees from discrimination based on genetic information in hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, and other aspects of employment. GINA also restricts employers' acquisition of genetic information and strictly limits disclosure of genetic information. Genetic information includes information about genetic tests of applicants, employees, or their family members; the manifestation of diseases or disorders in family members (family medical history); and requests for or receipt of genetic services by applicants, employees, or their family members.

### **RETALIATION**

All of these Federal laws prohibit covered entities from retaliating against a person who files a charge of discrimination, participates in a discrimination proceeding, or otherwise opposes an unlawful employment practice.

### **WHAT TO DO IF YOU BELIEVE DISCRIMINATION HAS OCCURRED**

There are strict time limits for filing charges of employment discrimination. To preserve the ability of EEOC to act on your behalf and to protect your right to file a private lawsuit, should you ultimately need to, you should contact EEOC promptly when discrimination is suspected:

The U.S. Equal Employment Opportunity Commission (EEOC), 1-800-669-4000 (toll-free) or 1-800-669-6820 (toll-free TTY number for individuals with hearing impairments). EEOC field office information is available at [www.eeoc.gov](http://www.eeoc.gov) or in most telephone directories in the U.S. Government or Federal Government section. Additional information about EEOC, including information about charge filing, is available at [www.eeoc.gov](http://www.eeoc.gov).

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## Employers Holding Federal Contracts or Subcontracts

Applicants to and employees of companies with a Federal government contract or subcontract are protected under Federal law from discrimination on the following bases:

### **RACE, COLOR, RELIGION, SEX, NATIONAL ORIGIN**

Executive Order 11246, as amended, prohibits job discrimination on the basis of race, color, religion, sex or national origin, and requires affirmative action to ensure equality of opportunity in all aspects of employment.

### **INDIVIDUALS WITH DISABILITIES**

Section 503 of the Rehabilitation Act of 1973, as amended, protects qualified individuals from discrimination on the basis of disability in hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, and other aspects of employment. Disability discrimination includes not making reasonable accommodation to the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or employee, barring undue hardship. Section 503 also requires that Federal contractors take affirmative action to employ and advance in employment qualified individuals with disabilities at all levels of employment, including the executive level.

### **DISABLED, RECENTLY SEPARATED, OTHER PROTECTED, AND ARMED FORCES SERVICE MEDAL VETERANS**

The Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, 38 U.S.C. 4212, prohibits job discrimination and requires affirmative action to employ and advance in employment disabled veterans, recently separated veterans (within

three years of discharge or release from active duty), other protected veterans (veterans who served during a war or in a campaign or expedition for which a campaign badge has been authorized), and Armed Forces service medal veterans (veterans who, while on active duty, participated in a U.S. military operation for which an Armed Forces service medal was awarded).

### **RETALIATION**

Retaliation is prohibited against a person who files a complaint of discrimination, participates in an OFCCP proceeding, or otherwise opposes discrimination under these Federal laws.

Any person who believes a contractor has violated its nondiscrimination or affirmative action obligations under the authorities above should contact immediately:

The Office of Federal Contract Compliance Programs (OFCCP), U.S. Department of Labor, 200 Constitution Avenue, N.W., Washington, D.C. 20210, 1-800-397-6251 (toll-free) or (202) 693-1337 (TTY). OFCCP may also be contacted by e-mail at [OFCCP-Public@dol.gov](mailto:OFCCP-Public@dol.gov), or by calling an OFCCP regional or district office, listed in most telephone directories under U.S. Government, Department of Labor.

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## Programs or Activities Receiving Federal Financial Assistance

### **RACE, COLOR, NATIONAL ORIGIN, SEX**

In addition to the protections of Title VII of the Civil Rights Act of 1964, as amended, Title VI of the Civil Rights Act of 1964, as amended, prohibits discrimination on the basis of race, color or national origin in programs or activities receiving Federal financial assistance. Employment discrimination is covered by Title VI if the primary objective of the financial assistance is provision of employment, or where employment discrimination causes or may cause discrimination in providing services under such programs. Title IX of the Education Amendments of 1972 prohibits employment discrimination on the basis of sex in educational programs or activities which receive Federal financial assistance.

### **INDIVIDUALS WITH DISABILITIES**

Section 504 of the Rehabilitation Act of 1973, as amended, prohibits employment discrimination on the basis of disability in any program or activity which receives Federal financial assistance. Discrimination is prohibited in all aspects of employment against persons with disabilities who, with or without reasonable accommodation, can perform the essential functions of the job.

If you believe you have been discriminated against in a program of any institution which receives Federal financial assistance, you should immediately contact the Federal agency providing such assistance.

# “EEO is the Law” Poster Supplement

## Employers Holding Federal Contracts or Subcontracts Section Revisions

*The Executive Order 11246 section is revised as follows:*

### **RACE, COLOR, RELIGION, SEX, SEXUAL ORIENTATION, GENDER IDENTITY, NATIONAL ORIGIN**

Executive Order 11246, as amended, prohibits employment discrimination based on race, color, religion, sex, sexual orientation, gender identity, or national origin, and requires affirmative action to ensure equality of opportunity in all aspects of employment.

### **PAY SECRECY**

Executive Order 11246, as amended, protects applicants and employees from discrimination based on inquiring about, disclosing, or discussing their compensation or the compensation of other applicants or employees.

*The Individuals with Disabilities section is revised as follows:*

### **INDIVIDUALS WITH DISABILITIES**

Section 503 of the Rehabilitation Act of 1973, as amended, protects qualified individuals with disabilities from discrimination in hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, and other aspects of employment. Disability discrimination includes not making reasonable accommodation to the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or employee, barring undue hardship to the employer. Section 503 also requires that Federal contractors take affirmative action to employ and advance in employment qualified individuals with disabilities at all levels of employment, including the executive level.

*The Vietnam Era, Special Disabled Veterans section is revised as follows:*

### **PROTECTED VETERANS**

The Vietnam Era Veterans’ Readjustment Assistance Act of 1974, as amended, 38 U.S.C. 4212, prohibits employment discrimination against, and requires affirmative action to recruit, employ, and advance in employment, disabled veterans, recently separated veterans (i.e., within three years of discharge or release from active duty), active duty wartime or campaign badge veterans, or Armed Forces service medal veterans.

*Mandatory Supplement to EEOC P/E-1(Revised 11/09) “EEO is the Law” Poster.*

If you believe that you have experienced discrimination contact OFCCP: 1-800-397-6251 | TTY 1-877-889-5627 | [www.dol.gov](http://www.dol.gov).