



EQUAL EMPLOYMENT OPPORTUNITY SUBMISSION
AUGUSTA GEORGIA PUBLIC TRANSIT DEPARTMENT
AUGUSTA GEORGIA COUNTY COMMISSION
AUGUSTA, GEORGIA

October 2011 – October 2014

Contact Information:

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Equal Employment Opportunity (EEO) Director
Augusta, Georgia
Office: (706)826-4789
jhumphrey@augustaga.gov



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION IV
Alabama, Florida, Georgia,
Kentucky, Mississippi,
North Carolina, Puerto
Rico, South Carolina,
Tennessee, Virgin Islands

230 Peachtree St., N.W.,
Suite 800
Atlanta, GA 30303
404-865-5600
404-865-5605 (fax)

23 September 2011

Ms. Jacqueline Humphrey
EEO Director
August Public Transit/Mobility Transit #2016
501 Greene Street, Suite 314
Augusta, Georgia 30901-4414

Re: EEO Program Approval

Dear Ms Humphrey,

This letter is to inform you that we received the August Public Transit/Mobility Transit's Equal Employment Opportunity (EEO) program on 15 September 2011. This submission is required pursuant to Title VII of the Civil Rights Act of 1964; Title 49, Chapter 53, Section 5332 of the United States Code; and the Federal Transit Administration's (FTA) Circular 4704.1, "Equal Employment Opportunity Program Guidelines for Grant Recipients," dated July 26, 1988.

We have reviewed your program and determined that it meets the requirements set forth in the FTA's EEO Circular 4704.1. Your EEO program will need to be updated 15 September 2014. Please plan to submit an updated EEO program within thirty days advance of the expiration date or by 15 August 2014.

If you have any questions regarding this approval, please do not hesitate to contact me directly at 404-865-5471 or email Jimmy.Moore@dot.gov.

Sincerely,

Jimmy Moore

Regional Civil Rights Officer/Equal Opportunity Specialist (ARRA)

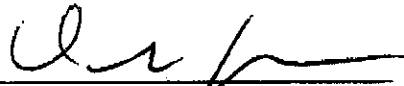
cc: Dr. Yvette Taylor, FTA Region 4 Regional Administrator

Augusta Georgia's Equal Employment Opportunity (EEO) Office

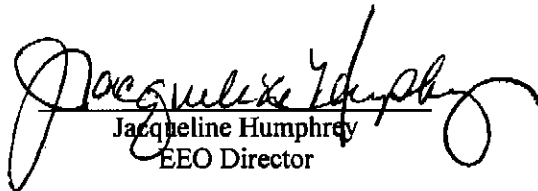
AUGUSTA GEORGIA PUBLIC TRANSIT DEPARTMENT

AUGUSTA, GEORGIA

October 2011 – October 2014



Deke S. Copenhaver
Mayor of Augusta Georgia



Jacqueline Humphrey
EEO Director

September 21, 2011

Date Submitted

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AUGUSTA GEORGIA PUBLIC TRANSIT DEPARTMENT
EQUAL EMPLOYMENT OPPORTUNITY PROGRAM COMPONENTS

AUGUSTA GEORGIA COUNTY COMMISSION

AUGUSTA, GEORGIA

UMTA C 4701.1
CHAPTER III

Overview

The Augusta Public Transit is a department of the Augusta-Richmond County consolidated government. Although the Transit Department has long employed more than 50 persons, it only met the second threshold requirement for compliance, as outlined in the U. S. Department of Transportation's Urban Mass Transportation Administration (UMTA) Circular (cir) 4704.1 (Equal Employment Opportunity Program Guidelines for Grant Recipients), with the approval of Federal Transportation Administration (FTA) Grant GA-90-X300 in June . At that time, the department obtained a grant containing an excess of \$3,000,000 (3.8) in FTA operating monies and capital assistance. As a result of meeting this monetary threshold, the Augusta Public Transit Department must now comply with certain requirements.

This submission has been prepared to provide an overview of the Augusta Public Transit Department's compliance with Chapter III, FTA, cir 4704.1. The Augusta Public Transit department has undergone a major change in the operation of their program, as of August 1, 2011. The Augusta Public Transit is currently operated by a sub contractor, MOBILITY Transit Services LLC. The Augusta Public Transit is responsible for oversight and compliance of this sub contractor on all FTA regulatory guidelines to ensure compliance.

Augusta Public Transit Statement of EEO Policy

The Augusta Transit Department provides equal employment opportunity to all qualified employees and applicants for employment and does not discriminate on any basis prohibited by law, including race, color, creed, national origin, sex, age or disability (the fore mentioned categories are considered to be protected classes). Therefore, it is the policy of the department not to tolerate illegal discrimination. Employment decisions for the Transit Department are based only on job-related criteria and the ability to perform the essential functions of a job. All personnel actions or programs that affect qualified individuals, such as employment, upgrading, demotion or transfer, recruitment, advertising, termination, rate of pay, other forms of compensation and selection for training, are made in a manner that does not illegally discriminate against individuals.

EEO Policy Statement

1. The Augusta Public Transit Department is committed to providing equal employment opportunities for people with disabilities. In keeping with our commitment to the inclusion of people with disabilities, the Augusta Public Transit Department makes reasonable accommodations impose an undue hardship on the department.
2. In addition, the Augusta Public Transit Department is committed to administering an ongoing Equal Employment Plan (EEO) in order to overcome the effects of past discrimination on minorities and women. The responsibility for implementing the Augusta Public Transit EEO Program is assigned to the Augusta Georgia Equal Opportunity (EEO) Director. Data in relation to the demographics collected and reviewed on an annual basis and as needed throughout the year (see Appendix A).
3. The EEO Director and Mobility's Transit General Manager share and will be responsible for ensuring EEO compliance.
4. The Mobility Transit managers will be assigned specific tasks to assure that compliance is achieved.
5. Any Mobility Transit applicant or employees who believe that they have been discriminated against on the basis of their race, color, creed, national origin, sex, age or disability has the right to file a complaint through the use of the Augusta Georgia's EEO Compliant Process (see Appendix B). A complaining party may file a formal written discrimination claim with Jacqueline Humphrey, the Augusta Georgia EEO Director. The contact information for the EEO Office is: 501 Greene Street, Suite 314, Augusta, Georgia, 30901, Phone: 706-826-4789 or E-mail: jhumphrey@augustaga.gov. Retaliation against a complaining individual is strictly prohibited.
6. All Mobility Transit managers, supervisors and employees are evaluated on the success of the EEO program with equal weight being given to their evaluation on the performance of other Augusta Georgia EEOP goals in accordance with UTMA C4704.1
7. Through the successful achievement of established EEO goals, a fuller utilization and development of previously underutilized human resources will be obtained by the Augusta Georgia EEO Office in accordance with UTMA C4704.1



Mayor Deke Copenhaver

9/11/11
Date



Jacqueline Humphrey, EEO Director

2 Sep 11
Date

B. Dissemination

Several formal communication mechanisms are used to disseminate the Augusta Georgia EEO Policy and programs to MOBILITY Transit Service, LLC employees and the general public. A written Augusta Public Transit Policy of Affirmative Action Letter is disseminated throughout the organizational structure and in the general public sector (See Appendix C).

Other forms of dissemination of this policy include the following internal and external processes:

Internally:

- The EEO Director sends out a written EEO-related communications to both the employees and the managers.
- The EEO Policies and Procedures Handbook. This section includes references to the current EEO Policy and the right of employees and applicants to file grievances based on alleged discrimination.
- The MOBILITY Transit Service Director will initiate and arrange semi-annual meetings with the EEO Director and the MOBILITY Transit Service Managers to discuss the implementation of the EEO Program.
- Included are non-discrimination clauses in all contractual provisions and agreements.
- All non-supervisory staff is informed of the EEO Policy by posters which are posted in the employee break room areas.
- The Augusta Georgia EEO Director arranges semi-annual meetings with all staff members to discuss EEO Policy and guidelines.
- The EEO Office provides ongoing training sessions for employees in the MOBILITY Transit Service, LLC.
- All new-hire employees are required to attend an orientation program at which the EEO handbook is reviewed. The review includes the Equal Employment Opportunity and Non-Discrimination section of the manual.

Externally:

- Augusta Georgia/MOBILITY Transit Service, LLC provides in all notices of job opportunities, that MOBILITY Transit Service, LLC is an Equal Employment Opportunity employer and does not discriminate in its hiring practices.
- Recruitment efforts and vacancy postings are located on the MOBILITY Transit Service, LLC Transit Service website. Included in every announcement is the statement of the policy that MOBILITY Transit Service, LLC is an Equal Employment Opportunity employer.

C. Designation of Personnel Responsibility

The Equal Employment Opportunity Director reports directly to the Mayor and Commission of Augusta Georgia IAW FTA Cir 4704.1. Among other work responsibilities, the EEO Office implements policies that will ensure equal employment opportunities in the hiring and promotion process and recommending changes in the employment process to the Mayor and Commission.

The EEO Director and MOBILITY's Transit Services, LLC General Manager works in partnership with the MOBILITY Transit Service, LLC to manage the Augusta Public Transits EEO Plan. In addition, EEO Policy prohibits employees and applicants from being subject to harassment, intimidation, treats, coercion, or discrimination because they have engaged in, or may have engaged in , EEO-related activities such as filing a complaint, assisting or participating in an investigation, compliance review or hearing. Employees are also protected from opposing any act or participate of discrimination. The Augusta Georgia EEO Office has the overall responsibility for implementing the Transit department's EEO Policy and IAW FTA Cir. 4704.1. The Augusta Georgia Commission and the Mayor have given the EEO Director, the primary management responsibility for ensuring that the Augusta Public Transit/ MOBILITY Transit Service, LLC is in full compliance with equal employment opportunity mandates and goals in accordance with FTA Cir 4704.1

D. Utilization Analysis

The following includes a Utilization Analysis of minorities and women included in MOBILITY Transit Service, LLC by job titles as well as minority and female availability analysis.

Tables have been compiled with this report to determine whether there exist conditions within Augusta Public Transit which reflect an underutilization of minorities or females. Underutilization exists when there are fewer minorities and/or women in a particular job category or department than would reasonably be expected based on their presence in the labor force. To make this analysis, the following factors have been considered:

1. A "Work Force Analysis" has been completed for Augusta Public Transit/MOBILITY Transit Services, LLC and is displayed on **Appendix A**. For each job category, the analysis includes the rates of pay for each job category, as well as a breakdown of the total number of employees by gender and by race group. Descriptions for all job positions employed by Augusta Public Transit are available in the Human Resources Department.
2. An "Availability Analysis" has been completed for Augusta Public Transit/ MOBILITY Transit Service, LLC and is shown on **Appendix B**. For each job category, the analysis compares the percentage of available labor force within Augusta-Richmond County against Augusta Public Transit/ MOBILITY Transit Service, LLC existing personnel by job category, by gender and by race.
3. Underutilization is determined by comparing the available total number of minorities in the job group with Augusta Public Transit existing total incumbents.

Augusta Public Transit/MOBILITY Transit Service, LLC is committed to identifying any underutilization and if such is found all measures to correct the issue will be implemented. The goals that will be established will be meaningful, measurable and realistic. They will be attainable and flexible targets, not quotas, which are prohibited by law. Goals may be revised

to accommodate changes that impact Augusta Public Transit/ MOBILITY Transit Service, LLC workforce.

E. **Goals and Timetables**

1. To establish and maintain employment level goals pursuant to joint Federal Equal Employment Opportunity Commission, U. S. Department of Justice, Georgia Department of Labor, Office of Federal Contract Compliance and U. S. Census Bureau, for racial minorities and women.
2. To distribute minority and female employment proportionately throughout job classes in service with Augusta Public Transit/MOBILITY Transit Service, LLC.
3. To make continuous effort to eliminate artificial barriers to employment and to prevent occurrence of arbitrary discrimination practices relating to employment or access to promotion with in this agency.
4. To provide an atmosphere of acceptance and understanding in which differences of race, gender, creed, religion, color, national origin, age or sexual orientation contribute to, rather that distract from effective job relations.
5. To eliminate physical barriers and constraints in both facilities and job composition which work against employment of the disabled?

F. **Assessment of Employment Practices to Identify Causes of Underutilization: Affirmative Action to Remedy Problems areas**

1. **Recruitment and Employment Selection Procedures**

Augusta Public Transit recruitment methods are focused upon drawing candidates from the largest available source of candidates possible. Job listings outside of the agency are posted with a variety of sources including the Georgia Department of Labor, Monster and Yahoo website, Augusta Staffing Job Agency and the Augusta Chronicle newspaper, that provide job openings in the government/public sector exclusively and web-based employment posting boards. Included in every job announcements, is the statement of the policy the Augusta Public Transit is an EEO employer.

2. **Seniority Practices and Provisions**

Augusta Transit currently does not have a seniority practices or provisions in place. Open positions are posted for all Augusta Transit employees to see and to apply. Any interested candidate who applies for a position is interviewed and provided the same opportunity to prove their capabilities of being the best candidate for the open position.

Augusta Public Transit is currently in its second year of its Leadership Readiness Program in which employees genuinely seeking promotion and career development may join this program to gain experience through exercises designed to improve their leadership skills. This program is open to all employees.

Augusta Public Transit's promotion practices are conducted following the guidelines spelled out in the Augusta Georgia's Personnel Policy and Procedure Manual, stating that the Augusta Public Transit will not unlawfully discriminate on the basis of race, color, creed, religion, gender, veteran status, national origin, ancestry, citizenship, age, physical disability, mental disability, medical condition or sexual orientation.

3. Procedures and Practices Regarding Wages, Salary Levels
Information regarding the distribution of wages and salary levels is spelled out in the Augusta Georgia's Personnel Policy and Procedure Manual's compensation chapter. For further information regarding the established salary and wages practices of the Augusta Public Transit, please see the Augusta Compensation Plan, Augusta Richmond County Commission meeting (March 2011).
4. Disciplinary Procedures: Discharge; and Termination
The Augusta Public Transit disciplinary process and procedures are outlined in the Augusta Georgia's Personnel Policy and Procedure manual associated with employee discipline, termination and the rules of conduct expected from all employees in the workplace setting. No disciplinary or termination decision should be on the basis of race, color, creed, religion, gender, national origin, age, or disability.
5. Accessibility of Employment Opportunities to Minorities and Women
Augusta Public Transit is an Equal Opportunity employer. Job announcements for available positions are posted on www.augustaga.gov, and the Georgia Department of Labor website.
6. Analysis of Recent Employment Changes
Appendix C (Augusta Public Transit, TBA) presents employment changes undergone over the past year (2011) to show the number of applicants for new employment, promotion or transfer who are from either minority or female. Additionally, individuals who during the same annual period who were subject to involuntary termination, are also presented in an effort to determine whether an unacceptable pattern of new hires, promotions or terminations exist within the Augusta Public Transit.

As **Appendix C** demonstrates, approximately half of the applications received for either employment or promotion were from women applicants and a majority of applicants for employment or promotion were from a minority group. Of the few individuals whose service to the Augusta Public Transit was terminated during 2010 there is no demonstrative racial or gender-based bias supporting such choices and in each case of termination, documentation exists as to the Augusta Public Transit's reasons for releasing such employees of their service to Augusta Public Transit.

In reviewing the results on **Appendix C**, the pattern of new hire applicants, promotion and termination is not a reflection of the race or gender of the individual. This information is reflected of the Augusta Public Transit prior to privatization to MOBILITY Transit Services, LLC effective August, 2011. As a sub-recipient, MOBILITY Transit Services General Manger understands and will be responsible for compliance to the regulatory guidelines as it relates to FTA Cir 4704.1.

Attached is a copy of MOBILITY's Transit Services, LLC EEOP.

G. Augusta Public Transit EEO Monitoring and Reporting Systems

The MOBILITY Transit Service, LLC has developed an internal and workable monitoring and reporting system which measures the effectiveness of its EEO Policies in accordance with FTA Cir 4704.1.

1. Quarterly updates of EEO Information/Review of goals will be provided to the Augusta Georgia EEO. MOBILITY Transit Service, LLC views the activities that are listed below as critical to the success of Equal Employment Opportunities Programs within the Augusta Transit Department/ MOBILITY Transit Service, LLC.
 - The Augusta Georgia EEO Office and MOBILITY Transit Service, LLC will continue to monitor records of applicants flow, referrals, placements, rejected offers, training, transfers, promotions, terminations and any layoffs or recalls to ensure that Augusta Public Transit/ MOBILITY Transit Service, LLC non-discriminatory policy is carried out. MOBILITY Transit Service, LLC EEO Policies and Procedures will be reviewed and revised in accordance with FTA Cir 4704.1.
 - The MOBILITY Transit Service, LLC General Manager and the EEO Director will inform each other of any EEO-related problems that arise in their respective areas so that immediate and appropriate steps can be taken to resolve any issues.
 - The Augusta Public Transit/ MOBILITY Transit Service, LLC recognizes its responsibility to affirmative action and is committed to fulfilling this responsibility by complying with all government regulations and laws pertaining to equal employment opportunity. As part of this commitment management will be kept abreast of developments in the affirmative action area. The primary vehicle for communication with management will be through quarterly reporting.
 - The Augusta Georgia EEO Office will generate internal reports for the Augusta Public Transit/ MOBILITY Transit Service, LLC annually and on a regular basis throughout the year to evaluate the degree to which the Augusta Georgia EEO/Affirmative Action objectives are being obtained.
 - Progress on the Augusta Public Transit/ MOBILITY Transit Service, LLC Affirmative Action Plan will be discussed at supervisors meetings, and relevant information will be communicated to the MOBILITY Transit Service, LLC employees during regular departmental meetings as appropriate.
 - The EEO Director will periodically report information in relation to the Augusta Public Transit/ MOBILITY Transit Service, LLC EEO Plan and progress to the Mayor and the Augusta Georgia Commission through the quarterly statistical data report. The Augusta Georgia EEO Office will oversee the effectiveness of the Augusta Public Transit/ MOBILITY Transit Service, LLC EEO Plan and submit annual recommendations for improvements to the Augusta Public Transit/ MOBILITY Transit Service, LLC. The Augusta Public Transit/ MOBILITY Transit Service, LLC EEO plan will be examined every three years in accordance with FTA Cir 4704.1.

2. **Monitoring of Sub-Contractor.** Augusta Public Transit will require each of its sub-contracting providers to prepare and share their prospective EEO Plans. The sub-contractor EEO plans are designed to be effective for approximately the same period as Augusta Public Transit EEO Plan, every three years in accordance with FTA Cir 4704.1. Thus, at the time that Augusta Public Transit will revise/update its own EEO Plan and analysis, it will require similar updates from each to its sub-contractors.
 - The separate sub-contractor EEO plans will be provided to FTA office via email as attachments to the.

Augusta Georgia Public Transit Department EEO Title VII Complaint Process

It is the policy of the Augusta Georgia Public Transit Department to protect each individual's civil rights. The department is committed to equal opportunity and equity. Therefore, the Transit Department complies with the provisions of Title VII, of the Civil Rights Act of 1964. These mandates state that no person, on the grounds of race, color, creed, national origin, sex, age or disability, may be excluded from, be denied the benefits of, or be subjected to discrimination.

The Augusta Georgia Public Transit Department is committed to enforcing civil rights provisions and protecting the rights and opportunities of all persons, employees and other associated with the department of affected by its programs. Therefore, the department will take positive and realistic action steps to ensure that all persons and/or firms wishing to participate in the department's program are given and equal and equitable chance to participate and/or receive benefits at each phase of programming.

Any person(s) or firm(s) who feels that they have been discriminated against based on race, color, creed, national origin, sex, age or disability, is encouraged to report such violations to the Augusta Georgia Public Transit Department/ MOBILITY Transit Service, LLC General Manager and the EEO Office.

Individuals who are having Title VII grievances may first speak to the Mobility General Manager on an informal basis to receive information and advertisement in relation to their specific situation without filing a formal grievance. The Augusta Public Transit/ MOBILITY Transit Service, LLC General Manager can be contacted at the following address:

Augusta Georgia Public Transit/ MOBILITY Transit Service, LLC
1535 Fenwick Street
Augusta, Georgia 30904
Phone: 706-821-1721

If the complaining individual does not feel that their concerns have been resolved at the level of the Augusta Public Transit Director, then they may file a formal written discrimination complaint with the Augusta Georgia Equal Employment Opportunity (EEO) Office within 180-days from the date of the last alleged discriminatory act. The complainant is required to provide sufficient information to substantiate discriminatory allegations. Individuals may withdraw a formal grievance and decide to seek mediation or an informal resolution at any point in the process. The EEO Director (Jacqueline Humphrey) can be contacted at the following address:

Augusta Georgia Equal Employment Opportunity Office
501 Greene Street, Suite #314
Augusta, Georgia 30901
Phone: 706-826-4789

All managers, employees, vendors and contractors connected to Augusta Georgia are required:

- To fully cooperate in the investigation process;
- Not to withhold any information (written, e-mailed, or oral) connected to an investigation;
- To make themselves available for questioning within 5 working days of a request for a meeting from the EEO Office;
- To provide truthful statements to the internal investigator;

The charge party will be issued a letter of findings and recommendations within 30 working days after filing a complaint.

Prohibition against Retaliation in Relation

Complaints, other employees, management, participants, and witnesses are protected against any form of organizational, administrative or management retaliation due to /or in any part based on participation in a complaint, inquiry, mediation and/or investigation. No one may not fire, demote, harass or otherwise “retaliate” against an individual for filing a discrimination charge.

If individuals believe they are being subjected to retaliation, the EEO Office should be notified in writing by the alleged victim of retaliation within 10 working days of the date of the alleged retaliatory act. The written allegation must outline the details of the specific acts that the individual believes are being done in retaliation.

The Augusta Georgia EEO Complaint Process:

Augusta, Georgia transit riders may consult with the EEO Office on an informal basis to receive information and consultation in relation to specific situations without filing a formal EEO complaint or grievance. In addition, they may withdraw a formal EEO complaint and seek mediation or an informal resolution at any point in the process.

Formal complaints must be filed in writing and signed by the citizen. Augusta Georgia transit riders may request to have a formal complaint issued orally and transcribed into written format by the EEO Office. An oral complaint must be transcribed into written format, signed and then submitted by the complaining party. The complainant is responsible for ensuring that their oral complaint is completed, signed, and submitted to the EEO Office within ten days after filing the oral complaint. Once a complainant files a written complaint, a letter is necessary to effectuate the withdrawal of an internal EEO complaint.

The EEO Office reserves the right to conduct an investigation of any and all complaints: formal/informal; written/oral; and pending/withdrawn. The EEO Office also reserves the right to conduct or continue an investigation even in situations where the complaint is withdrawn.



Case#: _____ - _____

EEO Complaint/Intake Form

Complainant: _____ Charged Party: _____

Check if EEO Counselor completed this form during counseling session with complainant.

Please complete this form in its entirety. This will assist the EEO Office in better understanding and handling your complaint. You will be referred to as the complainant, the one who is filing the complaint, throughout the process.

COMPLAINANT INFORMATION

Last, First Name: _____

Street Address: _____ City: _____ State: _____ Zip: _____

Home #: _____ Work #: _____ Cell #: _____ Pager #: _____

Email address: _____

Job Title: _____ Department: _____

Time in Dept.: _____ Years _____ Months Years of Employment: _____ Year _____ Months

Immediate Supervisor: _____ Phone #: _____

Department Manager: _____ Phone #: _____

Chairperson: _____ Phone #: _____

ALLEGED DISCRIMINATION

Check all the categories that apply to your complaint.

- Age
- Color
- Disability
- Gender/Sexual Harassment
- National Origin
- Race/Ethnicity
- Religion
- Retaliation
- Other
- Veteran Status

Check if additional pages are attached

1. Who is your complaint against?

2. Date(s) alleged discrimination occurred.

3. Explain the circumstances surrounding your complaint.

4. Do you have any direct evidence to support your complaint, i.e. memos, recorded conversations performance evaluations, etc.? If so, please explain.

5. In your work environment, has there been a pattern or practice that has occurred similar to the complaint you are filing? If so, please explain.

6. Was there a reason given for the alleged action taken against you? *Ex. Organizational restructuring, reduction in budget, etc.* If so, please explain.

7. Have you discussed your concerns with management?

List persons who may have information related to your complaint:

Name	Job Title	Contact	Relationship to you

What resolution would you like to occur?

- Mediation
- Formal Grievance
- No Further Action
- Departmental Training Session
- Management Meeting with EEO Officer
- Other

Your signature certifies that the information collected on this form is true and accurate.

Signature: _____

Date: _____

EEO Appointment Date _____

Time _____

a.m. p.m.



HR POLICY – Equal Employment Opportunity

Overview

MOBILITY's policy is to promote a culture where the differences of our employees, customers, business partners, and suppliers are recognized and valued. MOBILITY will therefore implement programs, company-wide, that promote diversity and education, acknowledging that a variety of backgrounds, philosophies, and work-styles ultimately lead to a more collaborative environment. This approach, in addition to making us an Equal Opportunity Employer, will allow MOBILITY to be a "thought leader" in the transit industry.

MOBILITY, in accordance with the regulations set forth by the U.S. Equal Opportunity Commission, has adopted and will maintain an Equal Employment Opportunity (EEO) policy.

The following document outlines the rules and regulations set forth by the EEOC and MOBILITY's policy & commitment to adherence. Please note that much of the language used in this document was taken directly from eoc.gov to ensure compliance with the most current rules available.

MOBILITY General Manager and HR specialists, at a minimum, will be familiar with the following policy and guidance.

MOBILITY Transit Services, LLC Statement of EEO Policy

It is the policy of MOBILITY Transit Services, LLC to pursue equal employment opportunity regardless of race, religion, color, sex, height, weight, marital status, national origin, age, or disability as defined by federal and state law in our relationship with applicants for employment, employees of the company, and the public. Therefore, it is the policy of the company not to tolerate illegal discrimination.

MOBILITY provides equal employment opportunity to all qualified individuals. The laws set forth by the EEO Commission protect employees and job applicants against employment discrimination when it involves:

- Unfair treatment because of race, color, religion, sex (including pregnancy), national origin, age (40 or older), disability, or genetic information.
- Harassment by managers, co-workers, or others in the workplace, because of race, color, religion, sex (including pregnancy), national origin, age (40 or older), disability or genetic information.
- Denial of a reasonable workplace accommodation that the employee needs because of religious beliefs or disability.
- Retaliation because the employee complained about job discrimination, or assisted with a job discrimination investigation or lawsuit.



HR POLICY – Equal Employment Opportunity

It is the policy of MOBILITY to abide by these rules. We also do not discriminate against applicants or employees on the basis of veteran's status, family care leave status, marital status, sexual orientation, and/or any other legally protected status.

In addition, MOBILITY follows a practice of affirmative action in promoting Equal Employment Opportunity.

A. Dissemination

This Policy Statement will be made available to employees, applicants, and organizations outside the department/agency through employee handbooks, policy directives, posting in conspicuous locations, the Internet, statements on recruitment documents, advertising, etc.

Executive, managerial, and supervisory personnel will be advised of the Policy, through meetings and/or training, with emphasis on individual responsibilities for implementation of the policy. The EEOC has standard protocols and procedures for handling any potential charges that may be made against a company. MOBILITY will explain its EEO policy and cover our commitment to compliance as part of its training programs. Additionally, we will conspicuously display the required EEO posters at our operations as a constant reminder to our employees.

B. Responsibilities

1) Implementation

MOBILITY's General Manager, in cooperation with the Augusta, Georgia EEO Director, shall implement this Equal Employment Opportunity (EEO) Plan and the Augusta EEO Plan. The plan shall be consistent with applicable law.

2) Executives, Managers, and Supervisors

MOBILITY Executives, Managers, and Supervisors are responsible for assuring that ALL recruitment for vacancies is handled in a manner to attract a qualified, diverse applicant pool and that hiring decisions are based on job-related factors.

MOBILITY Executives, Managers, and Supervisors are responsible for making reasonable efforts to assure that ALL Employees are provided a work environment that gives every Employee the opportunity to succeed. Employees shall be treated in a non-discriminatory manner, consistent with applicable laws, rules, regulations, and policies.

3) Administration of Equal Employment Opportunity Activities

MOBILITY's General Manager is responsible for undertaking the steps necessary to implement Equal Employment Opportunity activities consistent with the plan. Overall Equal Employment Opportunity responsibilities shall be coordinated with the Augusta, Georgia EEO Director.

HR POLICY – Equal Employment Opportunity

Activities in this area may include:

- Implementing the EEO Plan through internal and external communication processes.
- Identifying steps that will be taken to assure equal employment opportunity in developing pools of potential qualified employees, including identifying areas where equal employment opportunity improvement is necessary and recommending actions for solving them.
- Reviewing personnel policies, selection processes, and record keeping procedures that affect Equal Employment Opportunity. Employment data, practices, and policies will be analyzed to determine if these afford Equal Employment Opportunity. Appropriate steps to remedy any identified barriers will be taken in accordance with applicable laws, rules, and regulations and as approved by the Augusta Georgia EEO Director.
- Analyzing employment practices, including reassignments and promotions, and programs offered to employees, including training and other professional development activities to ensure that such activities occur in a non-discriminatory manner.
- Reporting data related to the composition of the workforce by job category, by race, and by gender.
- Coordinating Section 504/ADA/reasonable accommodation activities with the Augusta Georgia EEO Director.
- Investigate and report allegations of illegal discrimination and sexual harassment complaints to the Executives of MOBILITY Transit Services, LLC, Augusta Georgia Contract Administrator, and the Augusta Georgia EEO Director.

C. Employment Practices

1. Recruitment

Recruitment is a shared responsibility between MOBILITY and the City of Augusta. Qualified applicants who reflect the composition of all such persons in the relevant labor market will be strongly sought. All personnel involved in the recruiting, screening, and selection processes will be properly trained to ensure the elimination and absence of bias in all personnel actions.

Recruitment of applicants to assure equal opportunity may include the following employment resources:

- Civil Service Employment Lists (County, Multiple County, Statewide) consistent with Civil Service Rules and Regulations.
- Posting of vacancy(s), internally and/or externally (e.g., targeted newspapers, trade, professional and other journals, e-mail, Internet, MOBILITY Website, Augusta Georgia Website).
- Contacting Universities, Colleges, Schools, Churches, and professional organizations.
- Use of career development programs (e.g., school to work co-ops, internships and student assistants, speaking to schools and youth groups, departmental training programs).
- Referral agencies (e.g., Department of Career Development or other state/local employment agencies, private agencies).



HR POLICY – Equal Employment Opportunity

2. Hiring

MOBILITY will make hiring decisions based upon an evaluation of its workforce needs and an evaluation of a person's qualifications and ability to satisfactorily perform the essential duties of the position, with or without accommodation, consistent with applicable laws, rules, regulations, and if applicable, in accordance with any contractual requirements.

3. Promotions and Career Advancement

In accordance with the principles of Equal Employment Opportunity, MOBILITY will 1) promote employees based on experience, training, and ability to perform duties of a higher level, and 2) encourage employees to participate in available career advancement activities with the department, e.g., training programs (internal and external) and tuition reimbursement (if available).

D. Affirmative Action

MOBILITY will comply with the Affirmative Action reporting requirements in accordance with all the Federal and State regulations and the Augusta Georgia EEO Office. MOBILITY will take the following measure to ensure compliance with Executive Order 11246 and in addition to Equal Employment Opportunity.

- Complete up-to-date workforce profile, which records employees by race or ethnicity, gender and job classification will be maintained and reports submitted as, requested, and/or required.
- Carry out in depth analysis, as requested and/or required that includes an evaluation of the workforce by organizational unit and job group, all personnel activity, compensation systems and personnel procedures.
- Annually review the results of the aforementioned analysis with all levels of management to include effectiveness of the program and suggestions for improvement
- Advise all employees, at time of employment, that the firm is an Equal Opportunity/Reasonable Accommodations Employer and hiring promotion or demotions is based only on the individuals' qualification and ability to perform the essential functions of the job.
- Cooperate with and support apprenticeship training programs, if and when operationally feasible, based on strict non-discrimination
- Appoint an individual to serve as the Equal Employment Officer who is authorized to supply reports and represent the company in all matters regarding the Affirmative Action Plan
- Post the name, address, and telephone number of the Equal Employment Officer in a conspicuous place or places.

General Managers and contract-level HR representatives shall revisit the Department of Labor's web site on a regular basis (<http://www.dol.gov/dol/topic/hiring/affirmativeact.htm>) to ensure MOBILITY's compliance with the most-current regulations.

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E. Reporting of EEO Efforts

- A. A report on the steps taken to achieve MOBILITY's goal of a diverse work force and the performance of MOBILITY toward achieving its EEO goals and policies shall be prepared by the General Manager and submitted to the Augusta Georgia EEO Director per their reporting calendar or at the end of each fiscal year. The analysis and reporting shall include a review of:
1. Recruitment and selection;
 2. Promotions;
 3. Transfers;
 4. Disciplinary action; and
 5. Terminations and discharge from employment
- B. The EEO Plan and annual reports will also be available upon request to any State or Federal agencies that are seeking a review of the MOBILITY's compliance efforts as part of any grant requirements or as part of an investigation of a complaint of unlawful discrimination.

F. Dress Code

In general, an employer may establish a dress code that applies to all employees or employees within certain job categories. However, there are a few possible exceptions.

While an employer may require all workers to follow a uniform dress code even if the dress code conflicts with some workers' ethnic beliefs or practices, a dress code must not treat some employees less favorably because of their national origin. For example, a dress code that prohibits certain kinds of ethnic dress, such as traditional African or East Indian attire, but otherwise permits casual dress would treat some employees less favorably because of their national origin.

Moreover, if the dress code conflicts with an employee's religious practices and the employee requests an accommodation, the employer must modify the dress code or permit an exception to the dress code unless doing so would result in undue hardship.

G. Disciplinary Procedures: Discharge and Termination

MOBILITY's disciplinary processes and procedures are outlined in the MOBILITY Operators Manual associated with employee discipline, termination, and the rules of conduct expected from all Employees in the workplace setting. No disciplinary or termination decision should be based on race, color, creed, religion, gender, national origin, age, or disability.

HR POLICY – Equal Employment Opportunity



APPROVAL of this plan is by the CEO/President of MOBILITY Transit Services, LLC.

A handwritten signature in black ink that reads "Kevin J. Adams".

Sign Name: _____

Print Name: Kevin J. Adams

Date: 9/14/2011