

# **Metro**

**Affirmative Action Program  
for  
Minorities and Women**

**January 1, 2016 through December 31, 2016  
Plan Year**

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## **AFFIRMATIVE ACTION PROGRAM FOR MINORITIES AND WOMEN**

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## **Introduction**

Metro is a regional governmental entity that provides a forum by which cities, counties and citizens can resolve issues related to growth and transportation planning, protecting streams and open spaces, land-use choices and regional environmental management such as increasing recycling efforts.

Metro serves 1.3 million people who live in Clackamas, Multnomah, and Washington Counties, and the 25 cities in the Portland Metropolitan Area. Metro manages the Regional Parks & Greenspaces and the Oregon Zoo. Through the Metropolitan Exposition-Recreation Commission, Metro oversees the operations of the Oregon Convention Center, The Portland Center for the Performing Arts, and the Portland Metropolitan Exposition Center.

It is the policy of Metro to ensure that equal employment opportunities and affirmative action practices exist for all applicants and employees without regard to race, color, religion, sex, national origin, age, marital status, familial status, gender identity, sexual orientation, disability for which a reasonable accommodation can be made, or any other status protected by law.

The policies, practices and procedures established by this program apply to all Metro departments and project areas. They are intended to be an integral part of personnel policy and practice of Metro.

“Affirmative Action” is defined as a set of specific and result-oriented procedures to which Metro commits itself to apply every good faith effort.

This program has been adopted in order to voluntarily comply with requirements of the Office of Federal Contract Compliance Programs (OFCCP) and Executive Order 11246, as amended. Certain terminology, such as “underutilization” is used only because of those requirements. The adoption of the Affirmative Action Program (AAP) and the setting of goals and timetables is not to be interpreted as an admission that Metro has discriminated against any person or individuals at any time.

This Affirmative Action Program is not intended to create contract rights between Metro and its employees or any other third party, including applicants, by which any employee or applicant is entitled to any beneficial interest.

Metro is not currently a Federal contractor; however, Metro has prepared this Affirmative Action Program (AAP) for the period of 1/1/2016 - 12/31/2016, reaffirming its voluntary commitment to the spirit and letter of affirmative action law, including those administered by the U. S. Department of Labor’s Office of Federal Contract Compliance Programs (OFCCP). Through the implementation of this AAP Metro continues its efforts to voluntarily comply with appropriate government regulations and to make the best possible use of personnel while contributing to the betterment of society and the community.

In developing this AAP Metro recognizes its duty to ensure equal employment opportunity. The following statement of policy reinforces that belief.

## **Reaffirming Commitment to Equal Employment Opportunity**

In setting forth this AAP Metro reaffirms its belief in equal employment opportunity for all employees and applicants for employment in all terms and conditions of employment.

Through the affirmative action program. Metro:

- Expresses its strong commitment to provide equal employment opportunities and to take affirmative action to ensure nondiscrimination in employment practices;
- Informs all Metro elected officials and employees, governmental agencies and the general public of its intent to implement this policy statement; and
- Assures voluntary conformity with applicable federal regulations as they exist or may be amended.

See Appendix A for the Equal Opportunity Policy.

Metro Council President of Metro, designated The Human Resources Director as the Equal Employment Opportunity Administrator (EEO Administrator). The EEO Administrator oversees the AAP development, modification, implementation, and reporting requirements and conducts management updates. The EEO Administrator also analyzes Metro's selection process in order to further the principles of equal employment opportunity.

As part of Metro's commitment to this overall process, it will seek to ensure affirmative action to provide equality of opportunity in all aspects of employment, and that all personnel activities, such as the recruitment, selection, training, compensation, benefits, discipline, promotion, transfer, layoff and termination processes remain free of illegal discrimination and harassment based upon race, color, religion, sex, sexual orientation, gender identity, and national origin. Regular review by Metro, as described in this AAP, helps to ensure compliance with this policy.

## Definitions

For the purposes of this program, the following definitions shall apply:

- (a) “Affirmative Action” – a set of specific and result-oriented procedures to which Metro commits itself to apply every good faith effort to remove identified barriers and to ensure equal employment opportunity and nondiscriminatory practices and compliance.
- (b) “Discrimination” – act or failure to act, intentional or unintentional, the effect of which is that a person, because of their race, color, religion, sex, national origin, age, marital status, familial status, gender identity, sexual orientation, disability for which a reasonable accommodation can be made, or any other status protected by law, has been excluded from participation in, denied the benefits of, or has been otherwise subjected to unequal treatment.
- (c) “Equal Employment Opportunity” – employment activities conducted on an equal opportunity basis without discrimination as to race, color, religion, sex, national origin, age, marital status, familial status, gender identity, sexual orientation, disability for which a reasonable accommodation can be made, or any other status protected by law.
- (d) “Goals” – the establishment of good faith efforts such as expanded outreach, recruitment, training and other activities to increase the pool of qualified minorities and females.
- (e) “Minority” or “Minority-Groups” means:
  - a. “Black,” (not of Hispanic origin), which includes persons having origins in any of the black racial groups of Africa;
  - b. “Hispanic,” which includes all persons of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race;
  - c. “Asian or Pacific Islanders,” which includes persons of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands. This area includes, for example, China, Japan, Korea, the Philippine Islands, and Samoa;
  - d. “American Indian or Alaskan Native,” which includes persons having origins in any of the original peoples of North America and who maintain cultural identification through tribal affiliation or community recognition.
- (f) “Protected groups” or “class status” – women, persons with a disability for which a reasonable accommodation can be made, and those persons cited in “(c)” above.
- (g) “Utilization Analysis” – current incumbency within a departmental job group as compared to projected availability. Underutilization exists when there is a statistical adverse impact. Metro utilizes the 80% rule to determine underutilization.
- (h) 80% rule - “a selection rate for any race, sex, or ethnic group which is less than four-fifths (or 80%) of the rate for the group with the highest rate.

## DESCRIPTION OF JOB CATEGORIES

1. Officials and Administrators: Occupations in which employees set broad policies, exercise overall responsibility for execution of these policies, or direct individual departments or special phases of the agency's operations, or provide specialized consultation on a regional, district or area basis.
2. Professionals: Occupations which require specialized and theoretical knowledge which is usually acquired through college training or through work experience and other training which provides comparable knowledge.
3. Technicians: Occupations which require a combination of basic scientific or technical knowledge and manual skill which can be obtained through specialized post-secondary school education or through equivalent on-the-job training.
4. Protective Service Workers: Occupations in which workers are entrusted with public safety , security and protection from destructive forces.
5. Paraprofessionals: Occupations in which workers perform some of the duties of a professional or technician in a supportive role, which usually require less formal training and/or experience normally required for professional or technical status. Such positions may fall within an identified pattern of staff development and promotion under a "New Careers" concept.
6. Administrative Support(Including Clerical and Sales): Occupations in which workers are responsible for internal and external communication, recording and retrieval of data and/or information and other paperwork required in an office.
7. Skilled Craft Workers: Occupations in which workers perform jobs which require special manual skill and a thorough and comprehensive knowledge of the process involved in the work which is acquired through on-the-job training and experience or through apprenticeship or other formal training programs.
8. Service-Maintenance: Occupations in which workers perform duties which result in or contribute to the comfort, convenience, hygiene or safety of the general public or which contribute to the upkeep and care of buildings, facilities or grounds of public property. Workers in this group may operate machinery.

## **Internal Dissemination of EEO Policy**

### **41 C.F.R. § 60-1.42**

Metro posts copies of the equal employment opportunity notices that comply with 41 C.F.R. § 60-1.42(a) in conspicuous places (including, where applicable, electronic websites) available to employees, applicants for employment, and (if applicable) representatives of each labor union or other organization representing its employees with which Metro has a collective-bargaining agreement or other contract or understanding. The following exemplify the methods and locations Metro may use in its ongoing efforts to ensure continuing dissemination of its policy and AAP, although Metro may not always use each or any of the below methods, and it may use other methods not listed below:

1. Internal employee manuals contain the policy statement.
2. The policy statement is posted on bulletin boards accessible to employees.
3. Metro references the policy and progress in its annual report, newspaper, magazine and other publications.
4. Orientation meetings for new employees and in-house employment-related training include references to Metro's policy.
5. Metro publications, if any, including those with photographs, generally feature individuals of diverse gender, race, color, and national origin, where feasible.
6. Pertinent portions of Metro's Affirmative Action Program are available during regular business hours for inspection by employees and applicants for employment.

## **External Dissemination of EEO Policy**

### **41 C.F.R. § 60-1.41; 41 C.F.R. § 60-1.5**

1. In solicitations or advertisements for employees placed by or on its behalf, Metro complies with at least one of the following methods regarding the dissemination of its equal employment opportunity clause:
  - a. Metro states expressly in the solicitations or advertising that all qualified applicants will receive consideration for employment without regard to race, color, religion, sex, sexual orientation, gender identity, or national origin. 41 C.F.R. § 1.41(a).
  - b. Metro uses display or other advertising that includes an appropriate insignia prescribed by the Deputy Assistant Secretary, subject to the provisions of 18 U.S.C. § 701. 41 C.F.R. § 1.41(b).

- c. Metro uses a single advertisement, and the advertisement is grouped with other advertisements under a caption which clearly states that all employers in the group assure all qualified applicants equal consideration for employment without regard to race, color, religion, sex, sexual orientation, gender identity, or national origin. 41 C.F.R. § 1.41(c).
  - d. Metro uses a single advertisement in which appears in clearly-distinguishable type the phrase “an equal employment opportunity employer.” 41 C.F.R. § 1.41(d). When pictures are included in these media, where feasible, efforts will be made to include pictures of individuals of diverse gender, race, and national origin.
2. The following exemplify the methods and locations Metro may use in its ongoing efforts to ensure continuing dissemination of its policy and AAP, although Metro may not always use all of the below methods, and it may use other methods not listed below:
  - a. Metro notifies subcontractors, suppliers and vendors of the policy about both its obligations to equal employment opportunity and about Metro’s AAP.
  - b. Metro advises recruitment sources, minority and female organizations, community agencies, leaders, secondary schools and colleges annually in writing of its commitment to this policy and AAP. Metro informs these sources that job applicants will be treated fairly without regard to their race, color, religion, sex, sexual orientation, gender identity, and national origin.
  - c. Metro communicates with the state employment security office in writing regarding the policy.
  - d. Metro advises prospective employees of the existence of the AAP and makes pertinent portions of it available upon request, during regular business hours.
3. In addition, Metro incorporates by reference the equal employment opportunity and affirmative action clauses into each of its covered Government contracts and subcontracts, including Government bills of lading, transportation requests, contracts for deposit of Government funds, and contracts for issuing and paying U.S. savings bonds and notes and such other contracts and subcontracts as required by law, purchase orders, lease agreements, Government contracts, and other covered contracts (and modifications thereof if not included in the original contract) in accordance with 41. C.F.R. § 60-1.4 (a) – (c) (unless exempted under 41 C.F.R. § 60-1.5).

## **Establishment of Responsibility for Implementation of the AAP**

### **41 C.F.R. § 60-2.17(a)**

#### **A. Identification and Responsibilities of EEO Administrator**

Overall responsibility for Metro's AAP rests with the EEO Administrator, The Human Resources Director. The Human Resources Director ensures that the AAP complies with all applicable laws, orders and regulations, including but not limited to, Executive Orders 11246, 13496, and their progeny. Specifically, The Human Resources Director or the designated representative's duties include:

1. Developing, maintaining and, where appropriate, modifying Metro's AAP to ensure compliance with the EEO/AA law.
2. Developing and, where appropriate, modifying procedures for effectively communicating the AAP and its elements both internally and externally.
3. Advising management on EEO/AA progress, reporting potential EEO/AA problem areas, and assisting management in finding equitable solutions, where feasible, to any identifiable EEO/AA problem areas.
4. Evaluating the effectiveness of Metro's AAP on a regular basis, and reporting to management.
5. Designing, implementing, and overseeing audit and reporting systems that periodically measures the effectiveness of the total affirmative action program. 41 C.F.R. § 2.17 (d)(1)-(4), identifying need for remedial action, and determining the degree to which objectives have been achieved.
6. Acting as organization representative and liaison with any government agencies regarding this AAP.
7. Monitoring organization policies and procedures with regard to terms and conditions of employment to attempt to ensure compliance with affirmative action obligations.
8. Auditing the content of Metro's bulletin board and electronic policies, as appropriate, to ensure compliance information is posted and up to date.
9. Keeping management up to date on the latest developments in the areas of EEO and affirmative action.
10. Serving as a liaison between Metro and organizations, such as minority organizations and women's organizations.
11. When necessary, developing sales and management training programs to increase protected-group participation.
12. Assisting in the investigation, handling and disposition of employee harassment and discrimination complaints.

13. Discussing EEO/AA policies with all personnel, including management, to ensure that Metro's policies and the need for their support are understood at all levels.
14. Reviewing Metro's AAP for qualified women and minorities with all managers and supervisors to ensure the policy is understood and followed in all personnel actions.
15. Conducting periodic reviews of offices to ensure compliance in the areas of proper display of posters and notices, comparable facilities for both sexes, and opportunity for participation in Metro-sponsored recreational, educational and social activities.
16. Auditing training programs, hiring, and promotion patterns.

**B. Management Responsibilities**

Line and upper management share responsibility for the AAP, including but not limited to the following:

1. Assisting in auditing AAP progress, including identifying problem areas, formulating solutions, establishing appropriate goals, and developing necessary training programs.
2. Reviewing the qualifications of applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner in hiring, promotion, transfers, and termination actions.
3. Making available career counseling, when appropriate.
4. Reviewing the job performance of each employee to assess whether personnel actions are justified based on the employee and his or her duties.
5. Reviewing position descriptions of the jobs in the manager's area or department to see that they adequately reflect the job to be performed.
6. Assisting subordinates and upper management in the prevention of harassment.

## Identification of Areas for Discussion

### 41 C.F.R. § 60-2.17(b)

Metro's commitment to fully implement this policy and AAP include periodic reviews of processes, including performing an analysis of its total employment process to determine whether and where impediments to equal employment opportunity exist. These analyses include::

1. The workforce by organizational unit and job group of minority or female utilization and distribution;
2. Personnel activity to determine whether there are selection disparities;
3. Compensation systems to determine if there are gender-, race-, or ethnicity-based disparities;
4. Selection, recruitment, referral, and other personnel procedures to determine whether they result in employment or placement disparities of minorities or women; and,
5. Any other areas that might impact the success of the affirmative action program. 41 C.F.R. § 2.17 (b)(1)-(5), including, for example, Metro's review of:
  - a. The workforce composition by race and sex to compare it to the availability of these groups;
  - b. Metro's applicant flow compared to the availability for the protected groups;
  - c. A comparison of hires to applicants pertaining to minorities and women;
  - d. Selection forms, such as applications for employment, to ensure they comply with federal and state employment laws;
  - e. Processes to ensure there are no artificially-created barriers or restrictive seniority provisions; and,
  - f. Training opportunities to ensure they are available to minorities and women.

Identification of problem areas are discussed in the next section titled Narrative Discussion of Goals.

## **Narrative Discussion of Goals**

The Oregon Metro plan has 1776 employees, including 304 minorities and 938 females, including regular, variable hour and temporary employees. The following goals exist for minorities and/or women:

- 1 - Officials and Administrators - This group consists of 199 employees, of whom 20 are minorities and 89 are females. There is a goal of 15.4% for minorities, but there is no underutilization at this time for females.
- 2 - Professionals - This group consists of 284 employees, of whom 34 are minorities and 158 are females. There is a goal of 19.7% for minorities, but there is no underutilization at this time for females.
- 3 - Technicians - This group consists of 135 employees, of whom 20 are minorities and 50 are females. There is no underutilization at this time for minorities or females.
- 4 - Protective Service - This group consists of 64 employees, of whom 19 are minorities and 12 are females. There is no underutilization at this time for minorities, but there is a goal of 47.3% for females.
- 5 - Paraprofessionals - This group consists of 114 employees, of whom 23 are minorities and 75 are females. There is no underutilization at this time for minorities or females.
- 6 - Office/Clerical - This group consists of 158 employees, of whom 28 are minorities and 136 are females. There is no underutilization at this time for minorities or females.
- 7 - Skilled Craft - This group consists of 76 employees, of whom 8 are minorities and 6 are females. There is a goal of 17.0% for minorities and a goal of 25.9% for females.
- 8 - Service Maintenance - This group consists of 746 employees, of whom 152 are minorities and 412 are females. There is no underutilization at this time for minorities or females.

Metro will use alternate recruitment sources when necessary to attract more qualified external applicants to achieve our targeted goals. In those instances where statistical adverse impact is indicated when applying the 80% rule, Metro will take action steps to address the underutilization.

## **Development & Execution of Action-Oriented Programs**

### **41 C.F.R. § 60-2.17(c)**

Metro intends to comply with § 60-2.17(b), by institution action-oriented programs designing to eliminate problem areas should they exist. Metro also makes a good-faith effort to remove identified barriers, expand employment opportunities, and produce measurable results. An additional detailed list of action items is contained in Metro's Diversity Action Plan. These programs may include items such as:

1. Conducting periodic reviews of job descriptions attempting to ensure they accurately reflect job-related duties and responsibilities.
2. Making job descriptions and qualifications available to recruiting sources and to all members of management involved in the recruiting, screening, selection, and promotion processes.
3. Making good-faith efforts to select the most qualified candidates. Metro recognizes the duty, should the need arise, to make good faith efforts to remedy any statistically significant underutilization of minorities and women. Accordingly, Metro commits to evaluating the total selection process to ensure selections are made in a nondiscriminatory manner through:
  - a. Reviewing the job applications and other pre-employment forms to ensure information requested is job-related;
  - b. Evaluating selection methods to ensure that there is not disparate impact and that they are job-related and consistent with business necessity;
  - c. Providing assistance, such as training and guidance on proper interviewing techniques and EEO training, to employees, management, and supervisory staff, including, but not limited to, those who are involved in the recruitment, selection, discipline and other related processes, so that personnel actions are made in a nondiscriminatory manner; and
  - d. Reviewing selection techniques and employment standards.
  - e. As outlined in Metro's Diversity Action Plan 2.1.4 Include diversity language in classifications, job announcements and hiring panel questions as appropriate.
4. Metro employs appropriate methods to attempt to improve recruitment and increase the flow of qualified minorities and women applicants in its recruiting process, including a number of the following actions:
  - a. Including the phrase, "Equal Opportunity/Affirmative Action Employer" in printed employment advertisements;
  - b. Placing help-wanted advertisements, when appropriate, in local minority news media and women's interest media;

- c. Disseminating information on job opportunities to organizations representing minorities, women, and employment development agencies when job opportunities occur;
  - d. Encouraging all employees to refer qualified applicants;
  - e. Actively recruiting in secondary schools, junior colleges, colleges and universities with predominantly minority or female enrollments where underutilization exists in such areas, and
  - f. Requesting employment agencies to refer qualified minorities and women.
  - g. Metro considers using special employment programs designed to deal with underutilization. Business conditions and other feasibility matters remain the key factor in any decision to develop/implement such programs.
  - h. Whenever feasible and appropriate, Metro participates in job fairs, career days, youth-motivation programs and other programs that foster exposure for qualified minorities and women consistent with the Diversity Action Plan item 2.1.5: Attend a variety of job fair and ensure diverse employee representation at the events.
  - i. Metro encourages minorities and women to participate in Metro-sponsored activities and programs.
  - j. Metro utilizes various community organizations and schools as referral sources.
5. Metro reviews promotion criteria and procedures so that job qualifications form the basis for the promotional decisions. Metro may employ one or more of the following procedures::
- a. Providing job training, job-related courses or certificate programs.
  - b. Reviewing work specifications and job qualifications to ensure job-relatedness.
  - c. Reviewing promotion decisions for possible impact on women or minorities.
  - d. Conducting career coaching, where appropriate, during performance evaluations.
  - e. Informing employees about educational programs and other opportunities available to improve their employment prospects.
  - f. Reviewing Metro -sponsored social and recreational activities to ensure non-discriminatory participation and availability.
  - g. Ensuring that all employees are given equal opportunity for promotion. This is achieved by:
    - 1. Generally posting or otherwise announcing most promotional opportunities.

2. Offering counseling to assist employees in identifying promotional opportunities, training and educational programs to enhance promotions and opportunities for job rotation or transfer; and
3. Evaluating job requirements for promotion.

## **Internal Audit and Reporting System**

### **41 C.F.R. § 60-2.17(d)**

1. The Human Resources Director, Metro's EEO Administrator, maintains an internal audit system to attempt to oversee Metro's Affirmative Action Program and assess progress. The EEO Administrator is responsible for ensuring that the formal AAP documents are developed and prepared and for the effective AAP implementation; however, responsibility is likewise vested with each department manager and supervisor, depending upon the specific responsibility. The audit system is designed and implemented to measure the effectiveness of the total affirmative action program [41 C.F.R. § 2.17 (d)(1)-(4)], including:
  - a. Monitoring records of all personnel activity, including: referrals, placements, transfers, promotions, terminations, and compensation, at all levels, to ensure the nondiscriminatory policy is carried out consistent with Metro's Diversity Action Plan item 2.2.1,
  - b. Requiring internal reporting on a scheduled basis as to the degree to which equal employment opportunity and organizational objectives are attained,
  - c. Reviewing reports at all levels of management; and
  - d. Advising top management of the program's effectiveness and submitting recommendations to improve unsatisfactory performance. 41 C.F.R. § 2.17 (d)(1)-(4).
2. Metro reviews various employment decisions, such as job referrals, hiring decisions, transfers, promotions, and terminations. Metro maintains summary data where necessary and feasible, and conducts regular reviews at least annually.
3. There is no "de facto" (in practice without being officially established) segregation. Further, Metro ensures that facilities, as broadly defined in 41 C.F.R. § 60-1.8, provided for employees are provided in such a manner that segregation on the basis of race, color, religion, sex, sexual orientation, gender identity, or national origin cannot result, provided that separate or single-user restrooms and necessary dressing or sleeping areas shall be provided to ensure privacy between the sexes.
4. Metro complies with required records retention provisions set forth in 41 C.F.R. §60-1.12 and elsewhere in the applicable OFCCP regulations, and maintains a) employment applications (generally for two years); b) summary data of applicant flow by identifying, at least, total applicants, total minority applicants, and total female applicants, where necessary and feasible,

and conducts regular reviews at least annually; c) applicant flow showing the name, race, sex, date of application, job title, interview status, and the action taken for all individuals applying for job opportunities, and the relevant applicant/hire decisions; d) summary data of external job offers and hires, promotions, resignations, terminations, and layoffs by job group and by sex and minority group identification; e) and records pertaining to its compensation system.

5. Metro provides needed reports to managers and supervisors regarding the results of the audit as well as Metro's overall progress in the area of EEO/AA. Any recommended actions should be made as well. Reports shall be made to senior management on at least an annual basis.

## **Guidelines for Prevention of Sex Discrimination**

### **41 C.F.R. § 60-20.1 et seq.**

Metro supports the promotion and ensuring of equal employment opportunity of its employees and applicants without regard to sex, and endorses and complies with the following policy statements.

1. Metro employment advertisements do not express a sex preference nor does Metro place advertisements in columns designated "males" or "females", unless sex is a bona fide occupation obligation. 41 C.F.R. §60-20.2(a).
2. Employees of both sexes at Metro shall have an equal opportunity to any available job that he or she is qualified to perform, unless sex is a bona fide occupation obligation. 41 C.F.R. §60-20.2.
3. Metro maintains gender-neutral personnel policies that expressly indicate that there shall be no gender discrimination against employees. The terms and conditions of any written collective bargaining agreements shall not be inconsistent with these guidelines. 41 C.F.R. §60-20.3(a).
4. Metro makes no distinction based upon sex in employment opportunities, wages, hours, or other conditions of employment. 41 C.F.R §60-20.3(c).
5. Metro will not make any distinction between married and unmarried persons of one sex that is not made between married and unmarried persons of the opposite sex, or deny employment to women with young children unless it has the same exclusionary policies for men, or terminate the employment of an employee of one sex in a job classification upon reaching a certain age unless the same rule is applicable to members of the opposite sex. 41 C.F.R. § 60.20.3(d).
6. Metro has policies and practices to ensure appropriate physical facilities to both sexes. 41 C.F.R. § 60-20.3(e).
7. Metro will not deny a female employee the right to any job she is qualified to perform in reliance on a State "protective" law regarding, for example, prohibiting women from performing work such as a bartender, or for working at jobs requiring more than a certain number of hours or lifting above a certain weight. 41 C.F.R. § 60-20.3(f).

8. Metro endorses and complies with the 1978 Pregnancy Discrimination Act, as it amended Title VII of the Civil Rights Act of 1964. Metro applies any leave of absence policy uniformly, regardless of sex. 41 C.F.R. § 60-20.3(g).
9. Metro must not specify any differences for male and female employees on the basis of sex in either mandatory or optional retirement age. 41 C.F.R. § 60-20.3(h).
10. Metro's seniority lines and lists must not be based on sex. 41 C.F.R. § 60-20.4.
11. Metro's wage schedules are not related to or based on the sex of an employee. 41 C.F.R. § 60-20.5(a). Further, Metro does not discriminatorily restrict one sex to certain job classifications, and instead must take steps to make jobs available to all qualified employees in all classifications without regard to sex. 41 C.F.R. § 60-20.5(b).
12. When appropriate, Metro makes affirmative efforts to increase the number and percentage of women in the workforce, including, but not limited to the following:
  - a. Metro recruits women and encourages existing women employees to apply for positions historically labeled by society as "traditionally male".
  - b. Metro guarantees equal, gender-neutral access to training and tuition reimbursement programs, including management training, and other types of workplace training programs.
  - c. Metro informs management of its affirmative action responsibilities. 41 C.F.R. § 60-20.6.

See Appendix for Discrimination and Harassment Policy

## **Policy with Respect to Religion/National Origin**

### **41 C.F.R. § 60-50.1 et seq.**

Pursuant to the guidelines prohibiting discrimination on the basis of religion or national origin, 41 C.F.R. § 60-50.1, et seq., Metro hereby reaffirms that it does not discriminate against employees, or applicants for employment, because of religion or national origin. Metro takes affirmative action to seek to ensure that employees or applicants for employment are treated without regard to their religion or national origin in all aspects of the terms and conditions of employment, such as upgrading, demotion, transfer, recruitment, recruitment advertising, layoff, termination, rates of pay (or other forms of compensation), and selection for training.

Metro has reviewed its employment practices and determined that its employees, including those who belong to religious or ethnic groups, have received fair consideration for job opportunities. Based upon its review, and depending upon the circumstances, Metro will undertake appropriate actions, which may include one or more of the following activities:

1. Issuing a policy directive to employees reaffirming Metro's obligation to provide equal employment opportunity without regard to religion or national origin. This policy will be communicated in such a manner as to foster understanding, acceptance, and support among executives, managers, supervisors, and other employees, and to encourage such persons to take the necessary action to aid Metro in meeting its obligations.
2. Developing internal procedures to seek to ensure that Metro's obligation to provide equal employment opportunity, without regard to religion or national origin, is being fully implemented. Specifically, employment activities are reviewed by the EEO Administrator.
3. Informing management annually of its commitment to equal employment opportunity, without regard to religion or national origin.
4. Enlisting the assistance and support of recruitment sources for this commitment.

Metro acknowledges its responsibility to make reasonable accommodations for the religious observances and practices of its existing or prospective employees under the terms of Title VII of the Civil Rights Act of 1964. An accommodation for religious purposes will be denied should Metro determine that it would have to suffer undue hardship. During this accommodation evaluation, the following factors will continue to be considered by Metro:

1. Business necessity;
2. Financial costs and expenses; and
3. Resulting personnel problems.

# Utilization Analysis

Plan Date: 01/01/2016

Oregon Metro

Job Group	Group Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	199	10.1	44.7	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
2 - Professionals	284	12.0	55.6	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	
3 - Technicians	135	14.8	37.0	16.4	45.7	No <sup>1</sup>	No <sup>1</sup>		
4 - Protective Service	64	29.7	18.8	19.7	47.3	No <sup>1</sup>	Yes <sup>1</sup>		47.3
5 - Paraprofessionals	114	20.2	65.8	14.6	62.0	No <sup>1</sup>	No <sup>1</sup>		
6 - Office/Clerical	158	17.7	86.1	17.5	60.5	No <sup>1</sup>	No <sup>1</sup>		
7 - Skilled Craft	76	10.5	7.9	17.0	25.9	Yes <sup>1</sup>	Yes <sup>1</sup>	17.0	25.9
8 - Service Maintenance	746	20.4	55.2	22.5	49.9	No <sup>1</sup>	No <sup>1</sup>		

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Accounting Services Division*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	4	0.0	75.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
2 - Professionals	10	40.0	70.0	19.7	55.0	No <sup>1</sup>	No <sup>1</sup>		
6 - Office/Clerical	7	14.3	100.0	17.5	60.5	No <sup>1</sup>	No <sup>1</sup>		

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Acquisition - Open Spaces*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
2 - Professionals	6	0.0	33.3	19.7	55.0	Yes <sup>1</sup>	Yes <sup>1</sup>	19.7	55.0

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Administration-Open Spaces Acq*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	0.0	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Animal Care*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
3 - Technicians	4	0.0	75.0	16.4	45.7	Yes <sup>1</sup>	No <sup>1</sup>	16.4	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Applications Develop and Maint*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	100.0	0.0	15.4	44.0	No <sup>1</sup>	Yes <sup>1</sup>		44.0
2 - Professionals	8	0.0	75.0	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Blue Lake Park*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
8 - Service Maintenance	1	0.0	0.0	22.5	49.9	Yes <sup>1</sup>	Yes <sup>1</sup>	22.5	49.9

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Budget and Financial Mgmt*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	2	0.0	0.0	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0
2 - Professionals	3	0.0	33.3	19.7	55.0	Yes <sup>1</sup>	Yes <sup>1</sup>	19.7	55.0

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Built Environment & Landscapes*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
2 - Professionals	2	0.0	0.0	19.7	55.0	Yes <sup>1</sup>	Yes <sup>1</sup>	19.7	55.0

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Cash Vault*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
6 - Office/Clerical	1	0.0	100.0	17.5	60.5	Yes <sup>1</sup>	No <sup>1</sup>	17.5	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## Communication Design & Stds

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
2 - Professionals	5	20.0	60.0	19.7	55.0	No <sup>1</sup>	No <sup>1</sup>		
5 - Paraprofessionals	1	0.0	100.0	14.6	62.0	Yes <sup>1</sup>	No <sup>1</sup>	14.6	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Communications*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	0.0	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0
2 - Professionals	2	0.0	50.0	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Community Involvement*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
2 - Professionals	1	0.0	100.0	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Construction Proj Mgmt Office*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	100.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
2 - Professionals	3	66.7	33.3	19.7	55.0	No <sup>1</sup>	Yes <sup>1</sup>		55.0

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Consumer Goods*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	3	0.0	66.7	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
2 - Professionals	7	28.6	57.1	19.7	55.0	No <sup>1</sup>	No <sup>1</sup>		
5 - Paraprofessionals	3	33.3	33.3	14.6	62.0	No <sup>1</sup>	Yes <sup>1</sup>		62.0
6 - Office/Clerical	10	0.0	70.0	17.5	60.5	Yes <sup>1</sup>	No <sup>1</sup>	17.5	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Council - District 1*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	100.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Council - District 2*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	100.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Council - District 3*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	0.0	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Council - District 4*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	100.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Council - District 5*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	0.0	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Council - District 6*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	0.0	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Council - General/Staff*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	2	0.0	50.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
2 - Professionals	5	0.0	60.0	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	
5 - Paraprofessionals	2	0.0	100.0	14.6	62.0	Yes <sup>1</sup>	No <sup>1</sup>	14.6	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Council President*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	0.0	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Development Center*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	100.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
2 - Professionals	4	0.0	75.0	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## Education

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	3	0.0	0.0	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0
2 - Professionals	2	0.0	50.0	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	
5 - Paraprofessionals	4	0.0	75.0	14.6	62.0	Yes <sup>1</sup>	No <sup>1</sup>	14.6	
6 - Office/Clerical	3	0.0	100.0	17.5	60.5	Yes <sup>1</sup>	No <sup>1</sup>	17.5	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Education Administration*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
5 - Paraprofessionals	1	0.0	100.0	14.6	62.0	Yes <sup>1</sup>	No <sup>1</sup>	14.6	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## Engineering & Tech Support

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
2 - Professionals	3	0.0	0.0	19.7	55.0	Yes <sup>1</sup>	Yes <sup>1</sup>	19.7	55.0

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Equity, Diversity, Inclusion*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	100.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
5 - Paraprofessionals	1	100.0	0.0	14.6	62.0	No <sup>1</sup>	Yes <sup>1</sup>		62.0
6 - Office/Clerical	1	100.0	100.0	17.5	60.5	No <sup>1</sup>	No <sup>1</sup>		

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Expo Center Administration*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	0.0	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0
6 - Office/Clerical	2	50.0	100.0	17.5	60.5	No <sup>1</sup>	No <sup>1</sup>		

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## Expo Center Operations

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	100.0	0.0	15.4	44.0	No <sup>1</sup>	Yes <sup>1</sup>		44.0
6 - Office/Clerical	1	100.0	100.0	17.5	60.5	No <sup>1</sup>	No <sup>1</sup>		
7 - Skilled Craft	6	16.7	16.7	17.0	25.9	No <sup>1</sup>	Yes <sup>1</sup>		25.9
8 - Service Maintenance	6	0.0	33.3	22.5	49.9	Yes <sup>1</sup>	Yes <sup>1</sup>	22.5	49.9

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Expo Center Ticket Services*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	3	0.0	33.3	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0
6 - Office/Clerical	5	20.0	100.0	17.5	60.5	No <sup>1</sup>	No <sup>1</sup>		

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## *Expo Event Coordination*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	100.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
2 - Professionals	2	0.0	0.0	19.7	55.0	Yes <sup>1</sup>	Yes <sup>1</sup>	19.7	55.0
6 - Office/Clerical	2	50.0	100.0	17.5	60.5	No <sup>1</sup>	No <sup>1</sup>		

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Expo Events - Admissions*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
6 - Office/Clerical	2	0.0	100.0	17.5	60.5	Yes <sup>1</sup>	No <sup>1</sup>	17.5	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## Expo Marketing & Sales

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	100.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
6 - Office/Clerical	1	0.0	100.0	17.5	60.5	Yes <sup>1</sup>	No <sup>1</sup>	17.5	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Expo Parking*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	0.0	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## Facilities Management

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	2	0.0	50.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
2 - Professionals	1	0.0	0.0	19.7	55.0	Yes <sup>1</sup>	Yes <sup>1</sup>	19.7	55.0
6 - Office/Clerical	1	0.0	100.0	17.5	60.5	Yes <sup>1</sup>	No <sup>1</sup>	17.5	
7 - Skilled Craft	22	4.5	0.0	17.0	25.9	Yes <sup>1</sup>	Yes <sup>1</sup>	17.0	25.9
8 - Service Maintenance	2	0.0	0.0	22.5	49.9	Yes <sup>1</sup>	Yes <sup>1</sup>	22.5	49.9

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Food System*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
2 - Professionals	1	0.0	100.0	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Government Affairs & Policy D*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	3	0.0	0.0	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0
2 - Professionals	2	0.0	100.0	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	
6 - Office/Clerical	1	0.0	0.0	17.5	60.5	Yes <sup>1</sup>	Yes <sup>1</sup>	17.5	60.5

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## Guest Services Division

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	12	0.0	25.0	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0
2 - Professionals	3	0.0	33.3	19.7	55.0	Yes <sup>1</sup>	Yes <sup>1</sup>	19.7	55.0
4 - Protective Service	19	0.0	15.8	19.7	47.3	Yes <sup>1</sup>	Yes <sup>1</sup>	19.7	47.3
6 - Office/Clerical	13	7.7	76.9	17.5	60.5	Yes <sup>1</sup>	No <sup>1</sup>	17.5	
7 - Skilled Craft	3	0.0	33.3	17.0	25.9	Yes <sup>1</sup>	No <sup>1</sup>	17.0	
8 - Service Maintenance	452	19.5	58.2	22.5	49.9	No <sup>1</sup>	No <sup>1</sup>		

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## Hazardous Waste

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	0.0	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Horticulture*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
8 - Service Maintenance	1	0.0	100.0	22.5	49.9	Yes <sup>1</sup>	No <sup>1</sup>	22.5	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*HR - Benefits*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
2 - Professionals	1	100.0	100.0	19.7	55.0	No <sup>1</sup>	No <sup>1</sup>		
5 - Paraprofessionals	2	0.0	50.0	14.6	62.0	Yes <sup>1</sup>	No <sup>1</sup>	14.6	
6 - Office/Clerical	1	100.0	100.0	17.5	60.5	No <sup>1</sup>	No <sup>1</sup>		

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*HR - Classif, Comp, Recruit*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	100.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
2 - Professionals	5	20.0	100.0	19.7	55.0	No <sup>1</sup>	No <sup>1</sup>		
6 - Office/Clerical	2	0.0	100.0	17.5	60.5	Yes <sup>1</sup>	No <sup>1</sup>	17.5	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*HR - Labor & Employee Relation*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	2	0.0	50.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
5 - Paraprofessionals	1	0.0	100.0	14.6	62.0	Yes <sup>1</sup>	No <sup>1</sup>	14.6	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*HR - Organizational Develop*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
2 - Professionals	1	0.0	100.0	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	
5 - Paraprofessionals	1	0.0	100.0	14.6	62.0	Yes <sup>1</sup>	No <sup>1</sup>	14.6	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*HR - Payroll*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
2 - Professionals	1	0.0	100.0	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## Human Resources - Director

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	100.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
6 - Office/Clerical	1	0.0	100.0	17.5	60.5	Yes <sup>1</sup>	No <sup>1</sup>	17.5	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Information Services*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	100.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
6 - Office/Clerical	1	0.0	100.0	17.5	60.5	Yes <sup>1</sup>	No <sup>1</sup>	17.5	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Internal Sustainability Coord*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
2 - Professionals	2	0.0	50.0	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Investment Areas (Planning)*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	100.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
2 - Professionals	8	0.0	25.0	19.7	55.0	Yes <sup>1</sup>	Yes <sup>1</sup>	19.7	55.0
5 - Paraprofessionals	1	0.0	100.0	14.6	62.0	Yes <sup>1</sup>	No <sup>1</sup>	14.6	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*IS Project Management Office*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	0.0	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0
2 - Professionals	2	0.0	100.0	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*IS Technical Services*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	0.0	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0
2 - Professionals	5	0.0	20.0	19.7	55.0	Yes <sup>1</sup>	Yes <sup>1</sup>	19.7	55.0
3 - Technicians	4	25.0	25.0	16.4	45.7	No <sup>1</sup>	Yes <sup>1</sup>		45.7

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Landfill Operations*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	0.0	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0
2 - Professionals	1	0.0	0.0	19.7	55.0	Yes <sup>1</sup>	Yes <sup>1</sup>	19.7	55.0
3 - Technicians	3	0.0	33.3	16.4	45.7	Yes <sup>1</sup>	Yes <sup>1</sup>	16.4	45.7
5 - Paraprofessionals	1	0.0	0.0	14.6	62.0	Yes <sup>1</sup>	Yes <sup>1</sup>	14.6	62.0

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Latex Paint Facility*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	0.0	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0
3 - Technicians	3	0.0	0.0	16.4	45.7	Yes <sup>1</sup>	Yes <sup>1</sup>	16.4	45.7
6 - Office/Clerical	1	100.0	0.0	17.5	60.5	No <sup>1</sup>	Yes <sup>1</sup>		60.5

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## Living Collections Division

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	8	12.5	62.5	15.4	44.0	No <sup>1</sup>	No <sup>1</sup>		
2 - Professionals	4	0.0	25.0	19.7	55.0	Yes <sup>1</sup>	Yes <sup>1</sup>	19.7	55.0
3 - Technicians	23	8.7	82.6	16.4	45.7	Yes <sup>1</sup>	No <sup>1</sup>	16.4	
5 - Paraprofessionals	7	0.0	85.7	14.6	62.0	Yes <sup>1</sup>	No <sup>1</sup>	14.6	
6 - Office/Clerical	6	0.0	100.0	17.5	60.5	Yes <sup>1</sup>	No <sup>1</sup>	17.5	
8 - Service Maintenance	48	8.3	54.2	22.5	49.9	Yes <sup>1</sup>	No <sup>1</sup>	22.5	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Local Share - Open Spaces*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
2 - Professionals	1	100.0	100.0	19.7	55.0	No <sup>1</sup>	No <sup>1</sup>		

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Marketing Division*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	100.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
2 - Professionals	7	0.0	28.6	19.7	55.0	Yes <sup>1</sup>	Yes <sup>1</sup>	19.7	55.0
3 - Technicians	1	0.0	0.0	16.4	45.7	Yes <sup>1</sup>	Yes <sup>1</sup>	16.4	45.7
5 - Paraprofessionals	1	0.0	0.0	14.6	62.0	Yes <sup>1</sup>	Yes <sup>1</sup>	14.6	62.0
6 - Office/Clerical	1	100.0	100.0	17.5	60.5	No <sup>1</sup>	No <sup>1</sup>		

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## Metro Central Haz Waste

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	100.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
3 - Technicians	34	20.6	47.1	16.4	45.7	No <sup>1</sup>	No <sup>1</sup>		
6 - Office/Clerical	1	0.0	100.0	17.5	60.5	Yes <sup>1</sup>	No <sup>1</sup>	17.5	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## Metro Central Scalehouse

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
3 - Technicians	1	0.0	0.0	16.4	45.7	Yes <sup>1</sup>	Yes <sup>1</sup>	16.4	45.7
6 - Office/Clerical	3	66.7	100.0	17.5	60.5	No <sup>1</sup>	No <sup>1</sup>		

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Metro Reg Ctr - Janitorial Svc*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	100.0	0.0	15.4	44.0	No <sup>1</sup>	Yes <sup>1</sup>		44.0

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Metro Reg. Center Bldg Oper*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	100.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
2 - Professionals	1	0.0	100.0	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	
4 - Protective Service	2	100.0	0.0	19.7	47.3	No <sup>1</sup>	Yes <sup>1</sup>		47.3
6 - Office/Clerical	5	20.0	80.0	17.5	60.5	No <sup>1</sup>	No <sup>1</sup>		
7 - Skilled Craft	1	0.0	0.0	17.0	25.9	Yes <sup>1</sup>	Yes <sup>1</sup>	17.0	25.9
8 - Service Maintenance	7	57.1	28.6	22.5	49.9	No <sup>1</sup>	Yes <sup>1</sup>		49.9

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Metro South Haz Waste*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	100.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
3 - Technicians	20	10.0	15.0	16.4	45.7	Yes <sup>1</sup>	Yes <sup>1</sup>	16.4	45.7

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## Metro South Scalehouse

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	100.0	0.0	15.4	44.0	No <sup>1</sup>	Yes <sup>1</sup>		44.0
3 - Technicians	1	100.0	0.0	16.4	45.7	No <sup>1</sup>	Yes <sup>1</sup>		45.7
6 - Office/Clerical	8	25.0	87.5	17.5	60.5	No <sup>1</sup>	No <sup>1</sup>		

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

NA Communications

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
5 - Paraprofessionals	1	100.0	0.0	14.6	62.0	No <sup>1</sup>	Yes <sup>1</sup>		62.0

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## Natural Areas Capital Grants

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
6 - Office/Clerical	1	0.0	100.0	17.5	60.5	Yes <sup>1</sup>	No <sup>1</sup>	17.5	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Natural Areas Management*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	0.0	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0
2 - Professionals	2	50.0	100.0	19.7	55.0	No <sup>1</sup>	No <sup>1</sup>		
8 - Service Maintenance	9	11.1	33.3	22.5	49.9	Yes <sup>1</sup>	Yes <sup>1</sup>	22.5	49.9

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Nature in Neighborhoods*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
2 - Professionals	1	0.0	100.0	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*OCC Administration*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	2	0.0	0.0	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0
6 - Office/Clerical	2	50.0	100.0	17.5	60.5	No <sup>1</sup>	No <sup>1</sup>		

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## OCC Event Coordination

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	11	9.1	54.5	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
6 - Office/Clerical	8	12.5	62.5	17.5	60.5	Yes <sup>1</sup>	No <sup>1</sup>	17.5	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## OCC Facility Management

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	4	0.0	0.0	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0
2 - Professionals	1	0.0	0.0	19.7	55.0	Yes <sup>1</sup>	Yes <sup>1</sup>	19.7	55.0
6 - Office/Clerical	3	33.3	100.0	17.5	60.5	No <sup>1</sup>	No <sup>1</sup>		
7 - Skilled Craft	9	22.2	0.0	17.0	25.9	No <sup>1</sup>	Yes <sup>1</sup>		25.9

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## OCC Marketing & Sales

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	5	40.0	80.0	15.4	44.0	No <sup>1</sup>	No <sup>1</sup>		
2 - Professionals	2	0.0	100.0	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	
6 - Office/Clerical	2	0.0	100.0	17.5	60.5	Yes <sup>1</sup>	No <sup>1</sup>	17.5	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*OCC Operations - Audio Visual*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	2	0.0	50.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
2 - Professionals	2	50.0	50.0	19.7	55.0	No <sup>1</sup>	No <sup>1</sup>		
3 - Technicians	17	11.8	5.9	16.4	45.7	Yes <sup>1</sup>	Yes <sup>1</sup>	16.4	45.7

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*OCC Operations Utility Serv*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
5 - Paraprofessionals	1	0.0	100.0	14.6	62.0	Yes <sup>1</sup>	No <sup>1</sup>	14.6	
7 - Skilled Craft	6	16.7	0.0	17.0	25.9	No <sup>1</sup>	Yes <sup>1</sup>		25.9

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## OCC Set-up & Housekeeping

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	7	28.6	0.0	15.4	44.0	No <sup>1</sup>	Yes <sup>1</sup>		44.0
8 - Service Maintenance	53	34.0	37.7	22.5	49.9	No <sup>1</sup>	Yes <sup>1</sup>		49.9

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*OCC Special Services*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	100.0	0.0	15.4	44.0	No <sup>1</sup>	Yes <sup>1</sup>		44.0
3 - Technicians	12	33.3	16.7	16.4	45.7	No <sup>1</sup>	Yes <sup>1</sup>		45.7
4 - Protective Service	21	47.6	14.3	19.7	47.3	No <sup>1</sup>	Yes <sup>1</sup>		47.3
6 - Office/Clerical	1	0.0	100.0	17.5	60.5	Yes <sup>1</sup>	No <sup>1</sup>	17.5	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*OCC Telecommunications*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	0.0	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0
3 - Technicians	1	0.0	0.0	16.4	45.7	Yes <sup>1</sup>	Yes <sup>1</sup>	16.4	45.7

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## OCC Ticket Services

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	7	0.0	28.6	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0
6 - Office/Clerical	9	22.2	77.8	17.5	60.5	No <sup>1</sup>	No <sup>1</sup>		

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*OCC Volunteer Services*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
2 - Professionals	1	0.0	100.0	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Office of Chief Operat Officer*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	4	0.0	75.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
2 - Professionals	5	60.0	40.0	19.7	55.0	No <sup>1</sup>	Yes <sup>1</sup>		55.0
6 - Office/Clerical	1	0.0	100.0	17.5	60.5	Yes <sup>1</sup>	No <sup>1</sup>	17.5	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Office of Metro Attorney*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	2	0.0	50.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
2 - Professionals	8	12.5	50.0	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	
5 - Paraprofessionals	2	0.0	100.0	14.6	62.0	Yes <sup>1</sup>	No <sup>1</sup>	14.6	
6 - Office/Clerical	4	25.0	100.0	17.5	60.5	No <sup>1</sup>	No <sup>1</sup>		

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

Office of the Auditor

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	0.0	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0
2 - Professionals	4	25.0	50.0	19.7	55.0	No <sup>1</sup>	No <sup>1</sup>		
6 - Office/Clerical	1	100.0	100.0	17.5	60.5	No <sup>1</sup>	No <sup>1</sup>		

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Office of the CFO*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	3	0.0	0.0	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0
2 - Professionals	1	0.0	100.0	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	
5 - Paraprofessionals	1	0.0	100.0	14.6	62.0	Yes <sup>1</sup>	No <sup>1</sup>	14.6	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## P'5 Administration

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	2	0.0	100.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
2 - Professionals	3	0.0	66.7	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	
6 - Office/Clerical	1	0.0	100.0	17.5	60.5	Yes <sup>1</sup>	No <sup>1</sup>	17.5	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*P'5 Event Coordination*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	3	0.0	33.3	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0
6 - Office/Clerical	1	0.0	100.0	17.5	60.5	Yes <sup>1</sup>	No <sup>1</sup>	17.5	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*P'5 Events - Admissions*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	5	20.0	80.0	15.4	44.0	No <sup>1</sup>	No <sup>1</sup>		
6 - Office/Clerical	6	16.7	50.0	17.5	60.5	No <sup>1</sup>	No <sup>1</sup>		
8 - Service Maintenance	114	14.0	65.8	22.5	49.9	Yes <sup>1</sup>	No <sup>1</sup>	22.5	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## P'5 Facilities Management

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	8	25.0	25.0	15.4	44.0	No <sup>1</sup>	Yes <sup>1</sup>		44.0
6 - Office/Clerical	1	0.0	100.0	17.5	60.5	Yes <sup>1</sup>	No <sup>1</sup>	17.5	
7 - Skilled Craft	13	23.1	0.0	17.0	25.9	No <sup>1</sup>	Yes <sup>1</sup>		25.9
8 - Service Maintenance	29	58.6	27.6	22.5	49.9	No <sup>1</sup>	Yes <sup>1</sup>		49.9

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*P'5 Marketing & Sales*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	3	0.0	66.7	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*P'5 Operations Utility Serv*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
4 - Protective Service	15	26.7	26.7	19.7	47.3	No <sup>1</sup>	Yes <sup>1</sup>		47.3
7 - Skilled Craft	15	0.0	26.7	17.0	25.9	Yes <sup>1</sup>	No <sup>1</sup>	17.0	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*P'5 Special Services*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
4 - Protective Service	1	0.0	0.0	19.7	47.3	Yes <sup>1</sup>	Yes <sup>1</sup>	19.7	47.3

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*P'5 Ticket Services*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	10	20.0	80.0	15.4	44.0	No 1	No 1		
6 - Office/Clerical	14	21.4	78.6	17.5	60.5	No 1	No 1		

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*P'5 Volunteer Services*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
2 - Professionals	1	0.0	100.0	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Parks & Natural Areas Educ*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
2 - Professionals	2	0.0	100.0	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	
6 - Office/Clerical	1	0.0	100.0	17.5	60.5	Yes <sup>1</sup>	No <sup>1</sup>	17.5	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## *Parks & Natural Areas Planning*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	100.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
2 - Professionals	4	25.0	25.0	19.7	55.0	No <sup>1</sup>	Yes <sup>1</sup>		55.0
5 - Paraprofessionals	1	0.0	0.0	14.6	62.0	Yes <sup>1</sup>	Yes <sup>1</sup>	14.6	62.0

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## *Parks & Nature Admin Services*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	3	33.3	100.0	15.4	44.0	No 1	No 1		
6 - Office/Clerical	4	25.0	100.0	17.5	60.5	No 1	No 1		

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## *Parks & Visitor Services*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	3	0.0	33.3	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0
2 - Professionals	2	0.0	100.0	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	
6 - Office/Clerical	3	0.0	100.0	17.5	60.5	Yes <sup>1</sup>	No <sup>1</sup>	17.5	
7 - Skilled Craft	1	0.0	0.0	17.0	25.9	Yes <sup>1</sup>	Yes <sup>1</sup>	17.0	25.9
8 - Service Maintenance	18	16.7	50.0	22.5	49.9	Yes <sup>1</sup>	No <sup>1</sup>	22.5	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Parks and Property Stewardship*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	0.0	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Parks Construction*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
2 - Professionals	3	0.0	66.7	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	
3 - Technicians	1	0.0	100.0	16.4	45.7	Yes <sup>1</sup>	No <sup>1</sup>	16.4	
5 - Paraprofessionals	1	0.0	0.0	14.6	62.0	Yes <sup>1</sup>	Yes <sup>1</sup>	14.6	62.0

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Parks Science and Stewardship*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	0.0	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0
2 - Professionals	5	0.0	40.0	19.7	55.0	Yes <sup>1</sup>	Yes <sup>1</sup>	19.7	55.0
3 - Technicians	2	0.0	50.0	16.4	45.7	Yes <sup>1</sup>	No <sup>1</sup>	16.4	
6 - Office/Clerical	1	0.0	100.0	17.5	60.5	Yes <sup>1</sup>	No <sup>1</sup>	17.5	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Parks Volunteer Management*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
2 - Professionals	2	0.0	100.0	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*PES Administration (SW)*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	2	0.0	50.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
6 - Office/Clerical	3	0.0	100.0	17.5	60.5	Yes <sup>1</sup>	No <sup>1</sup>	17.5	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*PES Finance (SW)*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	100.0	100.0	15.4	44.0	No <sup>1</sup>	No <sup>1</sup>		
2 - Professionals	2	0.0	50.0	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	
5 - Paraprofessionals	5	0.0	80.0	14.6	62.0	Yes <sup>1</sup>	No <sup>1</sup>	14.6	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*PES Sales & Services*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
6 - Office/Clerical	1	100.0	100.0	17.5	60.5	No <sup>1</sup>	No <sup>1</sup>		

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## *Pioneer Cemeteries Program*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	100.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
2 - Professionals	3	0.0	100.0	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Plan and Dev Director's Office*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	2	0.0	50.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Plan Dev Budget and Finance*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
2 - Professionals	3	0.0	100.0	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	
5 - Paraprofessionals	1	0.0	100.0	14.6	62.0	Yes <sup>1</sup>	No <sup>1</sup>	14.6	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## Planning Administration

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	100.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
6 - Office/Clerical	6	0.0	100.0	17.5	60.5	Yes <sup>1</sup>	No <sup>1</sup>	17.5	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## Policy & Planning Comm

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	100.0	0.0	15.4	44.0	No <sup>1</sup>	Yes <sup>1</sup>		44.0
2 - Professionals	3	33.3	66.7	19.7	55.0	No <sup>1</sup>	No <sup>1</sup>		
5 - Paraprofessionals	2	0.0	50.0	14.6	62.0	Yes <sup>1</sup>	No <sup>1</sup>	14.6	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Procurement*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	100.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
2 - Professionals	6	16.7	83.3	19.7	55.0	No <sup>1</sup>	No <sup>1</sup>		

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Program & Facility Comm*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	3	33.3	100.0	15.4	44.0	No 1	No 1		
2 - Professionals	14	28.6	78.6	19.7	55.0	No 1	No 1		

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Property Management*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
2 - Professionals	1	0.0	100.0	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Records Information Management*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	100.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
2 - Professionals	2	0.0	50.0	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Reg Disaster Debris Planning*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
2 - Professionals	1	0.0	0.0	19.7	55.0	Yes <sup>1</sup>	Yes <sup>1</sup>	19.7	55.0

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Research Center - Modeling*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	0.0	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0
2 - Professionals	8	0.0	37.5	19.7	55.0	Yes <sup>1</sup>	Yes <sup>1</sup>	19.7	55.0
3 - Technicians	3	33.3	33.3	16.4	45.7	No <sup>1</sup>	Yes <sup>1</sup>		45.7

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Research Ctr - Director's off*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	2	0.0	50.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
2 - Professionals	1	100.0	0.0	19.7	55.0	No <sup>1</sup>	Yes <sup>1</sup>		55.0

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Research Ctr-Client Service*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
2 - Professionals	3	0.0	0.0	19.7	55.0	Yes <sup>1</sup>	Yes <sup>1</sup>	19.7	55.0
3 - Technicians	1	0.0	0.0	16.4	45.7	Yes <sup>1</sup>	Yes <sup>1</sup>	16.4	45.7

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Research Ctr-Enterprise Serv*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	0.0	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0
2 - Professionals	5	0.0	20.0	19.7	55.0	Yes <sup>1</sup>	Yes <sup>1</sup>	19.7	55.0
3 - Technicians	2	0.0	0.0	16.4	45.7	Yes <sup>1</sup>	Yes <sup>1</sup>	16.4	45.7

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Resource Conserv & Recyc Admin*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	0.0	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## Resource Development

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	0.0	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0
2 - Professionals	6	33.3	33.3	19.7	55.0	No <sup>1</sup>	Yes <sup>1</sup>		55.0
6 - Office/Clerical	1	0.0	0.0	17.5	60.5	Yes <sup>1</sup>	Yes <sup>1</sup>	17.5	60.5

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Risk Management*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
2 - Professionals	2	0.0	0.0	19.7	55.0	Yes <sup>1</sup>	Yes <sup>1</sup>	19.7	55.0

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Solid Waste Operations*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	2	0.0	0.0	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0
2 - Professionals	1	0.0	0.0	19.7	55.0	Yes <sup>1</sup>	Yes <sup>1</sup>	19.7	55.0
3 - Technicians	1	0.0	0.0	16.4	45.7	Yes <sup>1</sup>	Yes <sup>1</sup>	16.4	45.7

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Solid Waste Policy*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
2 - Professionals	2	0.0	50.0	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Solid Waste System*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
2 - Professionals	1	0.0	0.0	19.7	55.0	Yes <sup>1</sup>	Yes <sup>1</sup>	19.7	55.0

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Solid Waste System Planning*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
2 - Professionals	1	0.0	0.0	19.7	55.0	Yes <sup>1</sup>	Yes <sup>1</sup>	19.7	55.0

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Stabilization - Open Spaces*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	100.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
2 - Professionals	1	0.0	100.0	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	
8 - Service Maintenance	1	0.0	100.0	22.5	49.9	Yes <sup>1</sup>	No <sup>1</sup>	22.5	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*SW Compliance & Cleanup*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	3	0.0	33.3	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0
2 - Professionals	8	12.5	37.5	19.7	55.0	Yes <sup>1</sup>	Yes <sup>1</sup>	19.7	55.0
6 - Office/Clerical	1	0.0	100.0	17.5	60.5	Yes <sup>1</sup>	No <sup>1</sup>	17.5	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*SW Measurement*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
2 - Professionals	1	0.0	100.0	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## SW Transfer Stations

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
2 - Professionals	1	0.0	100.0	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Transport & Land Use Planning*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	0.0	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0
2 - Professionals	10	0.0	30.0	19.7	55.0	Yes <sup>1</sup>	Yes <sup>1</sup>	19.7	55.0
5 - Paraprofessionals	2	0.0	100.0	14.6	62.0	Yes <sup>1</sup>	No <sup>1</sup>	14.6	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## Volunteer & Youth Programs

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	1	0.0	100.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
2 - Professionals	11	0.0	72.7	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	
5 - Paraprofessionals	31	51.6	48.4	14.6	62.0	No <sup>1</sup>	Yes <sup>1</sup>		62.0
6 - Office/Clerical	1	0.0	100.0	17.5	60.5	Yes <sup>1</sup>	No <sup>1</sup>	17.5	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Zoo Administration Division*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	2	0.0	0.0	15.4	44.0	Yes <sup>1</sup>	Yes <sup>1</sup>	15.4	44.0
2 - Professionals	2	0.0	100.0	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	
6 - Office/Clerical	1	0.0	100.0	17.5	60.5	Yes <sup>1</sup>	No <sup>1</sup>	17.5	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## Zoo Camps and Classes

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
2 - Professionals	24	16.7	75.0	19.7	55.0	No <sup>1</sup>	No <sup>1</sup>		
5 - Paraprofessionals	38	7.9	76.3	14.6	62.0	Yes <sup>1</sup>	No <sup>1</sup>	14.6	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Zoo Construction & Maintenance*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
1 - Officials and Administrators	2	0.0	50.0	15.4	44.0	Yes <sup>1</sup>	No <sup>1</sup>	15.4	
2 - Professionals	2	0.0	0.0	19.7	55.0	Yes <sup>1</sup>	Yes <sup>1</sup>	19.7	55.0
5 - Paraprofessionals	2	50.0	50.0	14.6	62.0	No <sup>1</sup>	No <sup>1</sup>		

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## Zoo Elephant Collection

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
3 - Technicians	1	0.0	100.0	16.4	45.7	Yes <sup>1</sup>	No <sup>1</sup>	16.4	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

*Zoo Event Technical Support*

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
8 - Service Maintenance	1	0.0	0.0	22.5	49.9	Yes <sup>1</sup>	Yes <sup>1</sup>	22.5	49.9

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

Zoo Marketing Administration

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
2 - Professionals	1	0.0	100.0	19.7	55.0	Yes <sup>1</sup>	No <sup>1</sup>	19.7	

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

## Zoo Safety & Security

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
4 - Protective Service	5	40.0	40.0	19.7	47.3	No 1	No 1		
8 - Service Maintenance	4	25.0	50.0	22.5	49.9	No 1	No 1		

1 - 80% Rule

# Representation Analysis

Plan Date 01/01/2016

Oregon Metro

Zoo Security

Job Group	Size	Employment		Availability		Underutilization		Annual Goal	
		Minority	Female	Minority	Female	Minority	Female	Minority	Female
4 - Protective Service	1	100.0	0.0	19.7	47.3	No <sup>1</sup>	Yes <sup>1</sup>		47.3

1 - 80% Rule

# Progress Toward Goals Report

Oregon Metro

Job Group	Prior Year 2015			Opportunities			Minority Goal	Female Goal	Current Year 2016			Progress (Y/N)	
	Total	Minority	Females	Total	Minority	Females			Total	Minority	Females	Minority	Females
1 - Officials and Administrators	188	19	82	51	7	25	N/A	N/A	199	20	89	N/A	N/A
2 - Professionals	258	28	145	83	8	51	13.9	N/A	284	34	158	N	N/A
3 - Technicians	134	17	47	37	6	17	N/A	N/A	135	20	50	N/A	N/A
4 - Protective Service	64	17	15	18	5	7	N/A	46.4	64	19	12	N/A	N
5 - Paraprofessionals	104	21	70	61	7	38	N/A	N/A	114	23	75	N/A	N/A
6 - Office/Clerical	162	23	142	49	14	40	N/A	N/A	158	28	136	N/A	N/A
7 - Skilled Craft	72	7	5	10	1	0	16.0	25.2	76	8	6	N	N
8 - Service Maintenance	598	111	323	426	84	222	N/A	N/A	746	152	412	N/A	N/A

Goals were not met due to a limited number of openings and a lack of qualified applicants. The company will continue to monitor its activity and apply good faith measures designed to alleviate these goals.

# Adverse Impact Analysis

Date Range: 1/1/2015 - 12/31/2015

Metro

<b>Hires - Female</b>											
Job Group	Total Hires	Total Apps w/Sex	Unknown Apps	Female Hires	Female Apps	Select. Rate (%)	Male Hires	Male Apps	Select. Rate (%)	2SD	Adverse Impact
1 - Officials and Administrators	21	1214	13	11	492	2.24	10	722	1.39	-1.12	No
2 - Professionals	55	2388	62	34	1298	2.62	21	1090	1.93	-1.12	No
3 - Technicians	31	1294	21	14	651	2.15	17	643	2.64	0.58	No
4 - Protective Service	14	202	3	4	55	7.27	10	147	6.80	-0.12	No
5 - Paraprofessionals	53	1476	29	30	947	3.17	23	529	4.35	1.17	No
6 - Office/Clerical	35	4015	60	28	2891	0.97	7	1124	0.62	-1.06	No
7 - Skilled Craft	9	132	0	0	6	0.00	9	126	7.14	0.68	No
8 - Service Maintenance	396	3376	54	203	1628	12.4	193	1748	11.0	-1.29	No

# Adverse Impact Analysis

Date Range: 1/1/2015 - 12/31/2015

Metro

<b>Hires - Male</b>											
Job Group	Total Hires	Total Apps w/Sex	Unknown Apps	Male Hires	Male Apps	Select. Rate (%)	Female Hires	Female Apps	Select. Rate (%)	2SD	Adverse Impact
1 - Officials and Administrators	21	1214	13	10	722	1.39	11	492	2.24	1.12	No
2 - Professionals	55	2388	62	21	1090	1.93	34	1298	2.62	1.12	No
3 - Technicians	31	1294	21	17	643	2.64	14	651	2.15	-0.58	No
4 - Protective Service	14	202	3	10	147	6.80	4	55	7.27	0.12	No
5 - Paraprofessionals	53	1476	29	23	529	4.35	30	947	3.17	-1.17	No
6 - Office/Clerical	35	4015	60	7	1124	0.62	28	2891	0.97	1.06	No
7 - Skilled Craft	9	132	0	9	126	7.14	0	6	0.00	N/A	No
8 - Service Maintenance	396	3376	54	193	1748	11.0	203	1628	12.4	1.29	No

# Adverse Impact Analysis

Date Range: 1/1/2015 - 12/31/2015

Metro

<b>Hires - Minority</b>											
Job Group	Total Hires	Total Apps w/Race	Unknown Apps	Minority Hires	Minority Apps	Select. Rate (%)	White Hires	White Apps	Select. Rate (%)	2SD	Adverse Impact
1 - Officials and Administrators	21	1198	29	2	194	1.03	19	1004	1.89	0.84	No
2 - Professionals	55	2348	102	5	455	1.10	50	1893	2.64	1.95	No
3 - Technicians	31	1284	31	6	220	2.73	25	1064	2.35	-0.33	No
4 - Protective Service	14	204	1	5	77	6.49	9	127	7.09	0.16	No
5 - Paraprofessionals	53	1457	48	6	257	2.33	47	1200	3.92	1.23	No
6 - Office/Clerical	35	3964	111	10	935	1.07	25	3029	0.83	-0.70	No
7 - Skilled Craft	9	132	0	1	15	6.67	8	117	6.84	0.02	No
8 - Service Maintenance	396	3343	87	82	769	10.6	314	2574	12.2	1.16	No

# Adverse Impact Analysis

Date Range: 1/1/2015 - 12/31/2015

Metro

<b>Hires - White</b>											
<b>Job Group</b>	<b>Total Hires</b>	<b>Total Apps w/Race</b>	<b>Unknown Apps</b>	<b>White Hires</b>	<b>White Apps</b>	<b>Select. Rate (%)</b>	<b>Minority Hires</b>	<b>Minority Apps</b>	<b>Select. Rate (%)</b>	<b>2SD</b>	<b>Adverse Impact</b>
1 - Officials and Administrators	21	1198	29	16	1004	1.59	5	194	2.58	0.96	No
2 - Professionals	55	2348	102	49	1893	2.59	6	455	1.32	-1.61	No
3 - Technicians	31	1284	31	24	1064	2.26	7	220	3.18	0.81	No
4 - Protective Service	14	204	1	9	127	7.09	5	77	6.49	-0.16	No
<b>5 - Paraprofessionals</b>	<b>53</b>	<b>1457</b>	<b>48</b>	<b>34</b>	<b>1200</b>	<b>2.83</b>	<b>19</b>	<b>257</b>	<b>7.39</b>	<b>3.54</b>	<b>Yes</b>
<b>6 - Office/Clerical</b>	<b>35</b>	<b>3964</b>	<b>111</b>	<b>20</b>	<b>3029</b>	<b>0.66</b>	<b>15</b>	<b>935</b>	<b>1.60</b>	<b>2.70</b>	<b>Yes</b>
7 - Skilled Craft	9	132	0	8	117	6.84	1	15	6.67	-0.02	No
8 - Service Maintenance	396	3343	87	305	2574	11.8	91	769	11.8	-0.01	No

# Adverse Impact Analysis

Date Range: 1/1/2015 - 12/31/2015

Metro

<b>Hires - Black</b>												
Job Group	Total Hires	Total Apps w/Race	Unknown Apps	Black Hires	Black Apps	Select. Rate (%)	All Other Hires	All Other Apps	Select. Rate (%)	2SD	Adverse Impact	
1 - Officials and Administrators	21	1198	29	0	39	0.00	21	1159	1.81	0.85	No	
2 - Professionals	55	2348	102	0	97	0.00	55	2251	2.44	1.56	No	
3 - Technicians	31	1284	31	1	29	3.45	30	1255	2.39	-0.37	No	
4 - Protective Service	14	204	1	3	28	10.7	11	176	6.25	-0.87	No	
5 - Paraprofessionals	53	1457	48	1	50	2.00	52	1407	3.70	0.63	No	
6 - Office/Clerical	35	3964	111	2	239	0.84	33	3725	0.89	0.08	No	
7 - Skilled Craft	9	132	0	1	3	33.3	8	129	6.20	-1.84	No	
8 - Service Maintenance	396	3343	87	29	252	11.5	367	3091	11.8	0.17	No	

# Adverse Impact Analysis

Date Range: 1/1/2015 - 12/31/2015

Metro

<b>Hires - Hispanic</b>											
Job Group	Total Hires	Total Apps w/Race	Unknown Apps	Hispanic Hires	Hispanic Apps	Select. Rate (%)	All Other Hires	All Other Apps	Select. Rate (%)	2SD	Adverse Impact
1 - Officials and Administrators	21	1198	29	1	63	1.59	20	1135	1.76	0.10	No
2 - Professionals	55	2348	102	4	123	3.25	51	2225	2.29	-0.69	No
3 - Technicians	31	1284	31	3	78	3.85	28	1206	2.32	-0.85	No
4 - Protective Service	14	204	1	2	26	7.69	12	178	6.74	-0.18	No
5 - Paraprofessionals	53	1457	48	2	78	2.56	51	1379	3.70	0.52	No
6 - Office/Clerical	35	3964	111	3	281	1.07	32	3683	0.87	-0.34	No
7 - Skilled Craft	9	132	0	0	3	0.00	9	129	6.98	0.47	No
8 - Service Maintenance	396	3343	87	21	234	8.97	375	3109	12.0	1.41	No

# Adverse Impact Analysis

Date Range: 1/1/2015 - 12/31/2015

Metro

<b>Hires - Asian</b>											
<b>Job Group</b>	<b>Total Hires</b>	<b>Total Apps w/Race</b>	<b>Unknown Apps</b>	<b>Asian Hires</b>	<b>Asian Apps</b>	<b>Select. Rate (%)</b>	<b>All Other Hires</b>	<b>All Other Apps</b>	<b>Select. Rate (%)</b>	<b>2SD</b>	<b>Adverse Impact</b>
1 - Officials and Administrators	21	1198	29	1	41	2.44	20	1157	1.73	-0.34	No
2 - Professionals	55	2348	102	0	130	0.00	55	2218	2.48	1.82	No
3 - Technicians	31	1284	31	1	50	2.00	30	1234	2.43	0.19	No
4 - Protective Service	14	204	1	0	1	0.00	14	203	6.90	0.27	No
5 - Paraprofessionals	53	1457	48	3	62	4.84	50	1395	3.58	-0.52	No
6 - Office/Clerical	35	3964	111	1	167	0.60	34	3797	0.90	0.40	No
7 - Skilled Craft	9	132	0	0	2	0.00	9	130	6.92	0.39	No
8 - Service Maintenance	396	3343	87	16	85	18.8	380	3258	11.6	-2.02	No

# Adverse Impact Analysis

Date Range: 1/1/2015 - 12/31/2015

Metro

<b>Hires - American Indian</b>											
<b>Job Group</b>	<b>Total Hires</b>	<b>Total Apps w/Race</b>	<b>Unknown Apps</b>	<b>Am. Indian Hires</b>	<b>Am. Indian Apps</b>	<b>Select. Rate (%)</b>	<b>All Other Hires</b>	<b>All Other Apps</b>	<b>Select. Rate (%)</b>	<b>2SD</b>	<b>Adverse Impact</b>
1 - Officials and Administrators	21	1198	29	0	20	0.00	21	1178	1.78	0.60	No
2 - Professionals	55	2348	102	1	30	3.33	54	2318	2.33	-0.36	No
3 - Technicians	31	1284	31	0	16	0.00	31	1268	2.44	0.63	No
4 - Protective Service	14	204	1	0	7	0.00	14	197	7.11	0.73	No
5 - Paraprofessionals	53	1457	48	0	15	0.00	53	1442	3.68	0.76	No
6 - Office/Clerical	35	3964	111	1	81	1.23	34	3883	0.88	-0.34	No
7 - Skilled Craft	9	132	0	0	0	N/A	9	132	6.82	N/A	No
8 - Service Maintenance	396	3343	87	5	68	7.35	391	3275	11.9	1.16	No

# Adverse Impact Analysis

Date Range: 1/1/2015 - 12/31/2015

Metro

<b>Hires - Hawaiian</b>											
<b>Job Group</b>	<b>Total Hires</b>	<b>Total Apps w/Race</b>	<b>Unknown Apps</b>	<b>Hawaiian Hires</b>	<b>Hawaiian Apps</b>	<b>Select. Rate (%)</b>	<b>All Other Hires</b>	<b>All Other Apps</b>	<b>Select. Rate (%)</b>	<b>2SD</b>	<b>Adverse Impact</b>
1 - Officials and Administrators	21	1198	29	0	12	0.00	21	1186	1.77	0.47	No
2 - Professionals	55	2348	102	0	16	0.00	55	2332	2.36	0.62	No
3 - Technicians	31	1284	31	0	4	0.00	31	1280	2.42	0.32	No
4 - Protective Service	14	204	1	0	3	0.00	14	201	6.97	0.47	No
5 - Paraprofessionals	53	1457	48	0	7	0.00	53	1450	3.66	0.52	No
6 - Office/Clerical	35	3964	111	1	48	2.08	34	3916	0.87	-0.89	No
7 - Skilled Craft	9	132	0	0	1	0.00	9	131	6.87	0.27	No
8 - Service Maintenance	396	3343	87	5	40	12.5	391	3303	11.8	-0.13	No

# Adverse Impact Analysis

Date Range: 1/1/2015 - 12/31/2015

Metro

<b>Hires - Two or More Races</b>											
<b>Job Group</b>	<b>Total Hires</b>	<b>Total Apps w/Race</b>	<b>Unknown Apps</b>	<b>2 or More Hires</b>	<b>2 or More Apps</b>	<b>Select. Rate (%)</b>	<b>All Other Hires</b>	<b>All Other Apps</b>	<b>Select. Rate (%)</b>	<b>2SD</b>	<b>Adverse Impact</b>
1 - Officials and Administrators	21	1198	29	0	19	0.00	21	1179	1.78	0.59	No
2 - Professionals	55	2348	102	0	59	0.00	55	2289	2.40	1.20	No
3 - Technicians	31	1284	31	1	43	2.33	30	1241	2.42	0.04	No
4 - Protective Service	14	204	1	0	12	0.00	14	192	7.29	0.97	No
5 - Paraprofessionals	53	1457	48	0	45	0.00	53	1412	3.75	1.32	No
6 - Office/Clerical	35	3964	111	2	119	1.68	33	3845	0.86	-0.94	No
7 - Skilled Craft	9	132	0	0	6	0.00	9	126	7.14	0.68	No
8 - Service Maintenance	396	3343	87	6	90	6.67	390	3253	11.9	1.54	No

# Adverse Impact Analysis

Date Range: 1/1/2015 - 12/31/2015

Metro

<b>Promotions - Female</b>										
<b>Job Group</b>	<b>Total Proms</b>	<b>Total Pool</b>	<b>Female Proms</b>	<b>Female Pool</b>	<b>Select. Rate (%)</b>	<b>Male Proms</b>	<b>Male Pool</b>	<b>Select. Rate (%)</b>	<b>2SD</b>	<b>Adverse Impact</b>
1 - Officials and Administrators	19	188	9	82	10.9	10	106	9.43	-0.35	No
2 - Professionals	21	258	12	145	8.28	9	113	7.96	-0.09	No
3 - Technicians	14	134	8	47	17.0	6	87	6.90	-1.83	No
4 - Protective Service	4	64	3	15	20.0	1	49	2.04	-2.51	No
5 - Paraprofessionals	13	104	12	70	17.1	1	34	2.94	-2.05	No
6 - Office/Clerical	18	162	16	142	11.2	2	20	10.0	-0.17	No
7 - Skilled Craft	2	72	0	5	0.00	2	67	2.99	0.39	No
8 - Service Maintenance	30	598	16	323	4.95	14	275	5.09	0.08	No

Promotions identified from the job group  
 The pool consists of those employees present in the job group on 01/01/2015

# Adverse Impact Analysis

Date Range: 1/1/2015 - 12/31/2015

Metro

<b>Promotions - Male</b>										
<b>Job Group</b>	<b>Total Proms</b>	<b>Total Pool</b>	<b>Male Proms</b>	<b>Male Pool</b>	<b>Select. Rate (%)</b>	<b>Female Proms</b>	<b>Female Pool</b>	<b>Select. Rate (%)</b>	<b>2SD</b>	<b>Adverse Impact</b>
1 - Officials and Administrators	19	188	10	106	9.43	9	82	10.9	0.35	No
2 - Professionals	21	258	9	113	7.96	12	145	8.28	0.09	No
3 - Technicians	14	134	6	87	6.90	8	47	17.0	1.83	No
<b>4 - Protective Service</b>	<b>4</b>	<b>64</b>	<b>1</b>	<b>49</b>	<b>2.04</b>	<b>3</b>	<b>15</b>	<b>20.0</b>	<b>2.51</b>	<b>Yes</b>
<b>5 - Paraprofessionals</b>	<b>13</b>	<b>104</b>	<b>1</b>	<b>34</b>	<b>2.94</b>	<b>12</b>	<b>70</b>	<b>17.1</b>	<b>2.05</b>	<b>Yes</b>
6 - Office/Clerical	18	162	2	20	10.0	16	142	11.2	0.17	No
7 - Skilled Craft	2	72	2	67	2.99	0	5	0.00	N/A	No
8 - Service Maintenance	30	598	14	275	5.09	16	323	4.95	-0.08	No

Promotions identified from the job group  
 The pool consists of those employees present in the job group on 01/01/2015

# Adverse Impact Analysis

Date Range: 1/1/2015 - 12/31/2015

Metro

<b>Promotions - Minority</b>										
<b>Job Group</b>	<b>Total Proms</b>	<b>Total Pool</b>	<b>Minority Proms</b>	<b>Minority Pool</b>	<b>Select. Rate (%)</b>	<b>White Proms</b>	<b>White Pool</b>	<b>Select. Rate (%)</b>	<b>2SD</b>	<b>Adverse Impact</b>
1 - Officials and Administrators	19	188	3	19	15.7	16	169	9.47	-0.87	No
2 - Professionals	21	258	2	28	7.14	19	230	8.26	0.20	No
3 - Technicians	14	134	0	17	0.00	14	117	11.9	1.51	No
4 - Protective Service	4	64	0	17	0.00	4	47	8.51	1.24	No
5 - Paraprofessionals	13	104	2	21	9.52	11	83	13.2	0.46	No
6 - Office/Clerical	18	162	6	23	26.0	12	139	8.63	-2.47	No
7 - Skilled Craft	2	72	0	7	0.00	2	65	3.08	0.47	No
8 - Service Maintenance	30	598	2	111	1.80	28	487	5.75	1.72	No

Promotions identified from the job group  
 The pool consists of those employees present in the job group on 01/01/2015

# Adverse Impact Analysis

Date Range: 1/1/2015 - 12/31/2015

Metro

<b>Promotions - White</b>										
<b>Job Group</b>	<b>Total Proms</b>	<b>Total Pool</b>	<b>White Proms</b>	<b>White Pool</b>	<b>Select. Rate (%)</b>	<b>Minority Proms</b>	<b>Minority Pool</b>	<b>Select. Rate (%)</b>	<b>2SD</b>	<b>Adverse Impact</b>
1 - Officials and Administrators	19	188	16	169	9.47	3	19	15.7	0.87	No
2 - Professionals	21	258	18	230	7.83	3	28	10.7	0.53	No
3 - Technicians	14	134	14	117	11.9	0	17	0.00	N/A	No
4 - Protective Service	4	64	4	47	8.51	0	17	0.00	N/A	No
5 - Paraprofessionals	13	104	11	83	13.2	2	21	9.52	-0.46	No
<b>6 - Office/Clerical</b>	<b>18</b>	<b>162</b>	<b>12</b>	<b>139</b>	<b>8.63</b>	<b>6</b>	<b>23</b>	<b>26.0</b>	<b>2.47</b>	<b>Yes</b>
7 - Skilled Craft	2	72	2	65	3.08	0	7	0.00	N/A	No
8 - Service Maintenance	30	598	28	487	5.75	2	111	1.80	-1.72	No

Promotions identified from the job group  
 The pool consists of those employees present in the job group on 01/01/2015

# Adverse Impact Analysis

Date Range: 1/1/2015 - 12/31/2015

Metro

<b>Promotions - Black</b>										
<b>Job Group</b>	<b>Total Proms</b>	<b>Total Pool</b>	<b>Black Proms</b>	<b>Black Pool</b>	<b>Select. Rate (%)</b>	<b>All Other Proms</b>	<b>All Other Pool</b>	<b>Select. Rate (%)</b>	<b>2SD</b>	<b>Adverse Impact</b>
1 - Officials and Administrators	19	188	1	5	20.0	18	183	9.84	-0.74	No
2 - Professionals	21	258	0	3	0.00	21	255	8.24	0.52	No
3 - Technicians	14	134	0	4	0.00	14	130	10.7	0.69	No
4 - Protective Service	4	64	0	12	0.00	4	52	7.69	0.99	No
5 - Paraprofessionals	13	104	0	4	0.00	13	100	13.0	0.77	No
6 - Office/Clerical	18	162	1	12	8.33	17	150	11.3	0.32	No
7 - Skilled Craft	2	72	0	3	0.00	2	69	2.90	0.30	No
8 - Service Maintenance	30	598	1	48	2.08	29	550	5.27	0.97	No

Promotions identified from the job group  
 The pool consists of those employees present in the job group on 01/01/2015

# Adverse Impact Analysis

Date Range: 1/1/2015 - 12/31/2015

Metro

<b>Promotions - Hispanic</b>										
<b>Job Group</b>	<b>Total Proms</b>	<b>Total Pool</b>	<b>Hispanic Proms</b>	<b>Hispanic Pool</b>	<b>Select. Rate (%)</b>	<b>All Other Proms</b>	<b>All Other Pool</b>	<b>Select. Rate (%)</b>	<b>2SD</b>	<b>Adverse Impact</b>
1 - Officials and Administrators	19	188	0	4	0.00	19	184	10.3	0.68	No
2 - Professionals	21	258	2	8	25.0	19	250	7.60	-1.77	No
3 - Technicians	14	134	0	8	0.00	14	126	11.1	1.00	No
4 - Protective Service	4	64	0	2	0.00	4	62	6.45	0.37	No
5 - Paraprofessionals	13	104	2	13	15.3	11	91	12.0	-0.34	No
6 - Office/Clerical	18	162	4	7	57.1	14	155	9.03	-3.96	No
7 - Skilled Craft	2	72	0	4	0.00	2	68	2.94	0.35	No
8 - Service Maintenance	30	598	1	33	3.03	29	565	5.13	0.54	No

Promotions identified from the job group  
 The pool consists of those employees present in the job group on 01/01/2015

# Adverse Impact Analysis

Date Range: 1/1/2015 - 12/31/2015

Metro

<b>Promotions - Asian</b>										
<b>Job Group</b>	<b>Total Proms</b>	<b>Total Pool</b>	<b>Asian Proms</b>	<b>Asian Pool</b>	<b>Select. Rate (%)</b>	<b>All Other Proms</b>	<b>All Other Pool</b>	<b>Select. Rate (%)</b>	<b>2SD</b>	<b>Adverse Impact</b>
1 - Officials and Administrators	19	188	2	8	25.0	17	180	9.44	-1.43	No
2 - Professionals	21	258	0	16	0.00	21	242	8.68	1.23	No
3 - Technicians	14	134	0	3	0.00	14	131	10.6	0.60	No
4 - Protective Service	4	64	0	2	0.00	4	62	6.45	0.37	No
5 - Paraprofessionals	13	104	0	3	0.00	13	101	12.8	0.66	No
6 - Office/Clerical	18	162	1	4	25.0	17	158	10.7	-0.90	No
7 - Skilled Craft	2	72	0	0	N/A	2	72	2.78	N/A	No
8 - Service Maintenance	30	598	0	21	0.00	30	577	5.20	1.07	No

Promotions identified from the job group  
 The pool consists of those employees present in the job group on 01/01/2015

# Adverse Impact Analysis

Date Range: 1/1/2015 - 12/31/2015

Metro

<b>Promotions - American Indian</b>										
<b>Job Group</b>	<b>Total Proms</b>	<b>Total Pool</b>	<b>Am. Indian Proms</b>	<b>Am. Indian Pool</b>	<b>Select. Rate (%)</b>	<b>All Other Proms</b>	<b>All Other Pool</b>	<b>Select. Rate (%)</b>	<b>2SD</b>	<b>Adverse Impact</b>
1 - Officials and Administrators	19	188	0	2	0.00	19	186	10.2	0.48	No
2 - Professionals	21	258	0	1	0.00	21	257	8.17	0.30	No
3 - Technicians	14	134	0	2	0.00	14	132	10.6	0.49	No
4 - Protective Service	4	64	0	1	0.00	4	63	6.35	0.26	No
5 - Paraprofessionals	13	104	0	1	0.00	13	103	12.6	0.38	No
6 - Office/Clerical	18	162	0	0	N/A	18	162	11.1	N/A	No
7 - Skilled Craft	2	72	0	0	N/A	2	72	2.78	N/A	No
8 - Service Maintenance	30	598	0	9	0.00	30	589	5.09	0.69	No

Promotions identified from the job group  
 The pool consists of those employees present in the job group on 01/01/2015

# Adverse Impact Analysis

Date Range: 1/1/2015 - 12/31/2015

Metro

<b>Promotions - Hawaiian</b>										
<b>Job Group</b>	<b>Total Proms</b>	<b>Total Pool</b>	<b>Hawaiian Proms</b>	<b>Hawaiian Pool</b>	<b>Select. Rate (%)</b>	<b>All Other Proms</b>	<b>All Other Pool</b>	<b>Select. Rate (%)</b>	<b>2SD</b>	<b>Adverse Impact</b>
1 - Officials and Administrators	19	188	0	0	N/A	19	188	10.1	N/A	No
2 - Professionals	21	258	0	0	N/A	21	258	8.14	N/A	No
3 - Technicians	14	134	0	0	N/A	14	134	10.4	N/A	No
4 - Protective Service	4	64	0	0	N/A	4	64	6.25	N/A	No
5 - Paraprofessionals	13	104	0	0	N/A	13	104	12.5	N/A	No
6 - Office/Clerical	18	162	0	0	N/A	18	162	11.1	N/A	No
7 - Skilled Craft	2	72	0	0	N/A	2	72	2.78	N/A	No
8 - Service Maintenance	30	598	0	0	N/A	30	598	5.02	N/A	No

Promotions identified from the job group  
 The pool consists of those employees present in the job group on 01/01/2015

# Adverse Impact Analysis

Date Range: 1/1/2015 - 12/31/2015

Metro

<b>Promotions - Two or More Races</b>										
Job Group	Total Proms	Total Pool	2 or More			All Other			2SD	Adverse Impact
			Proms	Pool	Select. Rate (%)	Proms	Pool	Select. Rate (%)		
1 - Officials and Administrators	19	188	0	0	N/A	19	188	10.1	N/A	No
2 - Professionals	21	258	0	0	N/A	21	258	8.14	N/A	No
3 - Technicians	14	134	0	0	N/A	14	134	10.4	N/A	No
4 - Protective Service	4	64	0	0	N/A	4	64	6.25	N/A	No
5 - Paraprofessionals	13	104	0	0	N/A	13	104	12.5	N/A	No
6 - Office/Clerical	18	162	0	0	N/A	18	162	11.1	N/A	No
7 - Skilled Craft	2	72	0	0	N/A	2	72	2.78	N/A	No
8 - Service Maintenance	30	598	0	0	N/A	30	598	5.02	N/A	No

Promotions identified from the job group  
 The pool consists of those employees present in the job group on 01/01/2015

# Adverse Impact Analysis

Date Range: 1/1/2015 - 12/31/2015

Metro

<b>Terminations - Female</b>										
<b>Job Group</b>	<b>Total Terms</b>	<b>Total Pool</b>	<b>Female Terms</b>	<b>Female Pool</b>	<b>Select. Rate (%)</b>	<b>Male Terms</b>	<b>Male Pool</b>	<b>Select. Rate (%)</b>	<b>2SD</b>	<b>Adverse Impact</b>
1 - Officials and Administrators	21	188	9	82	10.9	12	106	11.3	-0.07	No
2 - Professionals	41	258	28	145	19.3	13	113	11.5	1.70	No
3 - Technicians	22	134	7	47	14.8	15	87	17.2	-0.35	No
4 - Protective Service	9	64	4	15	26.6	5	49	10.2	1.60	No
5 - Paraprofessionals	33	104	20	70	28.5	13	34	38.2	-0.99	No
6 - Office/Clerical	35	162	30	142	21.1	5	20	25.0	-0.39	No
7 - Skilled Craft	8	72	0	5	0.00	8	67	11.9	-0.82	No
8 - Service Maintenance	255	598	126	323	39.0	129	275	46.9	-1.95	No

The pool consists of those employees present in the job group on 01/01/2015

# Adverse Impact Analysis

Date Range: 1/1/2015 - 12/31/2015

Metro

<b>Terminations - Male</b>										
<b>Job Group</b>	<b>Total Terms</b>	<b>Total Pool</b>	<b>Male Terms</b>	<b>Male Pool</b>	<b>Select. Rate (%)</b>	<b>Female Terms</b>	<b>Female Pool</b>	<b>Select. Rate (%)</b>	<b>2SD</b>	<b>Adverse Impact</b>
1 - Officials and Administrators	21	188	12	106	11.3	9	82	10.9	0.07	No
2 - Professionals	41	258	13	113	11.5	28	145	19.3	-1.70	No
3 - Technicians	22	134	15	87	17.2	7	47	14.8	0.35	No
4 - Protective Service	9	64	5	49	10.2	4	15	26.6	-1.60	No
5 - Paraprofessionals	33	104	13	34	38.2	20	70	28.5	0.99	No
6 - Office/Clerical	35	162	5	20	25.0	30	142	21.1	0.39	No
7 - Skilled Craft	8	72	8	67	11.9	0	5	0.00	0.82	No
8 - Service Maintenance	255	598	129	275	46.9	126	323	39.0	1.95	No

The pool consists of those employees present in the job group on 01/01/2015

# Adverse Impact Analysis

Date Range: 1/1/2015 - 12/31/2015

Metro

<b>Terminations - Minority</b>										
<b>Job Group</b>	<b>Total Terms</b>	<b>Total Pool</b>	<b>Minority Terms</b>	<b>Minority Pool</b>	<b>Select. Rate (%)</b>	<b>White Terms</b>	<b>White Pool</b>	<b>Select. Rate (%)</b>	<b>2SD</b>	<b>Adverse Impact</b>
1 - Officials and Administrators	21	188	3	19	15.7	18	169	10.6	0.67	No
2 - Professionals	41	258	6	28	21.4	35	230	15.2	0.85	No
3 - Technicians	22	134	3	17	17.6	19	117	16.2	0.15	No
4 - Protective Service	9	64	2	17	11.7	7	47	14.8	-0.32	No
5 - Paraprofessionals	33	104	6	21	28.5	27	83	32.5	-0.35	No
6 - Office/Clerical	35	162	4	23	17.3	31	139	22.3	-0.53	No
7 - Skilled Craft	8	72	0	7	0.00	8	65	12.3	-0.98	No
8 - Service Maintenance	255	598	46	111	41.4	209	487	42.9	-0.28	No

The pool consists of those employees present in the job group on 01/01/2015

# Adverse Impact Analysis

Date Range: 1/1/2015 - 12/31/2015

Metro

<b>Terminations - White</b>										
<b>Job Group</b>	<b>Total Terms</b>	<b>Total Pool</b>	<b>White Terms</b>	<b>White Pool</b>	<b>Select. Rate (%)</b>	<b>Minority Terms</b>	<b>Minority Pool</b>	<b>Select. Rate (%)</b>	<b>2SD</b>	<b>Adverse Impact</b>
1 - Officials and Administrators	21	188	18	169	10.6	3	19	15.7	-0.67	No
2 - Professionals	41	258	34	230	14.7	7	28	25.0	-1.40	No
3 - Technicians	22	134	18	117	15.3	4	17	23.5	-0.85	No
4 - Protective Service	9	64	7	47	14.8	2	17	11.7	0.32	No
5 - Paraprofessionals	33	104	22	83	26.5	11	21	52.3	-2.28	No
6 - Office/Clerical	35	162	27	139	19.4	8	23	34.7	-1.66	No
7 - Skilled Craft	8	72	7	65	10.7	1	7	14.2	-0.28	No
8 - Service Maintenance	255	598	205	487	42.0	50	111	45.0	-0.57	No

The pool consists of those employees present in the job group on 01/01/2015

# Adverse Impact Analysis

Date Range: 1/1/2015 - 12/31/2015

Metro

<b>Terminations - Black</b>										
<b>Job Group</b>	<b>Total Terms</b>	<b>Total Pool</b>	<b>Black Terms</b>	<b>Black Pool</b>	<b>Select. Rate (%)</b>	<b>All Other Terms</b>	<b>All Other Pool</b>	<b>Select. Rate (%)</b>	<b>2SD</b>	<b>Adverse Impact</b>
1 - Officials and Administrators	21	188	1	5	20.0	20	183	10.9	0.64	No
2 - Professionals	41	258	0	3	0.00	41	255	16.0	-0.76	No
3 - Technicians	22	134	0	4	0.00	22	130	16.9	-0.90	No
4 - Protective Service	9	64	1	12	8.33	8	52	15.3	-0.63	No
5 - Paraprofessionals	33	104	2	4	50.0	31	100	31.0	0.80	No
6 - Office/Clerical	35	162	1	12	8.33	34	150	22.6	-1.16	No
7 - Skilled Craft	8	72	0	3	0.00	8	69	11.5	-0.63	No
8 - Service Maintenance	255	598	15	48	31.2	240	550	43.6	-1.66	No

The pool consists of those employees present in the job group on 01/01/2015

# Adverse Impact Analysis

Date Range: 1/1/2015 - 12/31/2015

Metro

<b>Terminations - Hispanic</b>										
<b>Job Group</b>	<b>Total Terms</b>	<b>Total Pool</b>	<b>Hispanic Terms</b>	<b>Hispanic Pool</b>	<b>Select. Rate (%)</b>	<b>All Other Terms</b>	<b>All Other Pool</b>	<b>Select. Rate (%)</b>	<b>2SD</b>	<b>Adverse Impact</b>
1 - Officials and Administrators	21	188	2	4	50.0	19	184	10.3	2.49	Yes
2 - Professionals	41	258	4	8	50.0	37	250	14.8	2.68	Yes
3 - Technicians	22	134	0	8	0.00	22	126	17.4	-1.29	No
4 - Protective Service	9	64	0	2	0.00	9	62	14.5	-0.58	No
5 - Paraprofessionals	33	104	3	13	23.0	30	91	32.9	-0.72	No
6 - Office/Clerical	35	162	1	7	14.2	34	155	21.9	-0.48	No
7 - Skilled Craft	8	72	0	4	0.00	8	68	11.7	-0.73	No
8 - Service Maintenance	255	598	11	33	33.3	244	565	43.1	-1.11	No

The pool consists of those employees present in the job group on 01/01/2015

# Adverse Impact Analysis

Date Range: 1/1/2015 - 12/31/2015

Metro

<b>Terminations - Asian</b>										
<b>Job Group</b>	<b>Total Terms</b>	<b>Total Pool</b>	<b>Asian Terms</b>	<b>Asian Pool</b>	<b>Select. Rate (%)</b>	<b>All Other Terms</b>	<b>All Other Pool</b>	<b>Select. Rate (%)</b>	<b>2SD</b>	<b>Adverse Impact</b>
1 - Officials and Administrators	21	188	0	8	0.00	21	180	11.6	-1.03	No
2 - Professionals	41	258	2	16	12.5	39	242	16.1	-0.38	No
<b>3 - Technicians</b>	<b>22</b>	<b>134</b>	<b>3</b>	<b>3</b>	<b>100</b>	<b>19</b>	<b>131</b>	<b>14.5</b>	<b>3.95</b>	<b>Yes</b>
4 - Protective Service	9	64	1	2	50.0	8	62	12.9	1.49	No
5 - Paraprofessionals	33	104	1	3	33.3	32	101	31.6	0.06	No
6 - Office/Clerical	35	162	2	4	50.0	33	158	20.8	1.40	No
7 - Skilled Craft	8	72	0	0	N/A	8	72	11.1	N/A	No
8 - Service Maintenance	255	598	12	21	57.1	243	577	42.1	1.37	No

The pool consists of those employees present in the job group on 01/01/2015

# Adverse Impact Analysis

Date Range: 1/1/2015 - 12/31/2015

Metro

<b>Terminations - American Indian</b>										
<b>Job Group</b>	<b>Total Terms</b>	<b>Total Pool</b>	<b>Am. Indian Terms</b>	<b>Am. Indian Pool</b>	<b>Select. Rate (%)</b>	<b>All Other Terms</b>	<b>All Other Pool</b>	<b>Select. Rate (%)</b>	<b>2SD</b>	<b>Adverse Impact</b>
1 - Officials and Administrators	21	188	0	2	0.00	21	186	11.2	-0.50	No
2 - Professionals	41	258	0	1	0.00	41	257	15.9	-0.44	No
3 - Technicians	22	134	0	2	0.00	22	132	16.6	-0.63	No
4 - Protective Service	9	64	0	1	0.00	9	63	14.2	-0.41	No
5 - Paraprofessionals	33	104	0	1	0.00	33	103	32.0	-0.69	No
6 - Office/Clerical	35	162	0	0	N/A	35	162	21.6	N/A	No
7 - Skilled Craft	8	72	0	0	N/A	8	72	11.1	N/A	No
<b>8 - Service Maintenance</b>	<b>255</b>	<b>598</b>	<b>7</b>	<b>9</b>	<b>77.7</b>	<b>248</b>	<b>589</b>	<b>42.1</b>	<b>2.15</b>	<b>Yes</b>

The pool consists of those employees present in the job group on 01/01/2015

# Adverse Impact Analysis

Date Range: 1/1/2015 - 12/31/2015

Metro

<b>Terminations - Hawaiian</b>										
<b>Job Group</b>	<b>Total Terms</b>	<b>Total Pool</b>	<b>Hawaiian Terms</b>	<b>Hawaiian Pool</b>	<b>Select. Rate (%)</b>	<b>All Other Terms</b>	<b>All Other Pool</b>	<b>Select. Rate (%)</b>	<b>2SD</b>	<b>Adverse Impact</b>
1 - Officials and Administrators	21	188	0	0	N/A	21	188	11.1	N/A	No
2 - Professionals	41	258	0	0	N/A	41	258	15.8	N/A	No
3 - Technicians	22	134	0	0	N/A	22	134	16.4	N/A	No
4 - Protective Service	9	64	0	0	N/A	9	64	14.0	N/A	No
5 - Paraprofessionals	33	104	0	0	N/A	33	104	31.7	N/A	No
6 - Office/Clerical	35	162	0	0	N/A	35	162	21.6	N/A	No
7 - Skilled Craft	8	72	0	0	N/A	8	72	11.1	N/A	No
8 - Service Maintenance	255	598	0	0	N/A	255	598	42.6	N/A	No

The pool consists of those employees present in the job group on 01/01/2015

# Adverse Impact Analysis

Date Range: 1/1/2015 - 12/31/2015

Metro

<b>Terminations - Two or More Races</b>										
<b>Job Group</b>	<b>Total Terms</b>	<b>Total Pool</b>	<b>2 or More Terms</b>	<b>2 or More Pool</b>	<b>Select. Rate (%)</b>	<b>All Other Terms</b>	<b>All Other Pool</b>	<b>Select. Rate (%)</b>	<b>2SD</b>	<b>Adverse Impact</b>
1 - Officials and Administrators	21	188	0	0	N/A	21	188	11.1	N/A	No
2 - Professionals	41	258	0	0	N/A	41	258	15.8	N/A	No
3 - Technicians	22	134	0	0	N/A	22	134	16.4	N/A	No
4 - Protective Service	9	64	0	0	N/A	9	64	14.0	N/A	No
5 - Paraprofessionals	33	104	0	0	N/A	33	104	31.7	N/A	No
6 - Office/Clerical	35	162	0	0	N/A	35	162	21.6	N/A	No
7 - Skilled Craft	8	72	0	0	N/A	8	72	11.1	N/A	No
8 - Service Maintenance	255	598	1	0	N/A	254	598	42.4	N/A	No

The pool consists of those employees present in the job group on 01/01/2015

# **Metro**

**Affirmative Action Program  
For Protected Veterans**

**January 1, 2016 through December 31, 2016  
Plan Year**

# **Metro**

## **AFFIRMATIVE ACTION PROGRAM FOR PROTECTED VETERANS**

**January 1, 2016 through December 31, 2016  
Plan Year**

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## **Introduction**

Metro is not currently a Federal Contractor; however, Metro sets forth this affirmative action program (“AAP”) for the year from January 1, 2016 through December 31, 2016, reaffirming its voluntary commitment to the spirit and letter of affirmative action law. Through the implementation of this voluntary plan Metro continues its voluntary efforts to comply with appropriate government regulations and to make the best possible use of personnel while contributing to the betterment of society and the community.

In developing this AAP, Metro recognizes its duty to ensure equal employment opportunity. The following statement of policy reinforces that belief.

## **Equal Employment Opportunity Policy Statement**

### **41 C.F.R. § 60-300.44(a)**

In setting forth this plan Metro reaffirms its belief and commitment in equal employment opportunity for all employees and applicants for employment in all terms and conditions of employment. The Human Resources Director, as the EEO Administrator, oversees the plan development, modification, implementation, and reporting requirements and conducts management updates. Metro’s leadership supports Metro’s AAP.

Metro provides for an audit and reporting system regarding Metro’s affirmative action responsibilities under the Vietnam Era Veterans’ Readjustment Assistance Act of 1974, as amended (“VEVRAA”) regulations, and assigns overall responsibility for the implementation of affirmative action responsibilities under these regulations and applicable State regulations.

Metro recruits, hires, trains and promotes persons in all job titles, and ensures that all personnel actions are administered without regard to protected veteran status; and ensures that all employment actions are based only on valid job requirements. Metro’s employees and applicants are not subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in any of the following activities:

1. filing a complaint with Metro or with Federal, state, or local agencies regarding the status covered under this AAP;
2. assisting or participating in any investigation, compliance review, hearing, or any other activity related to the administration of any Federal, State, or local law requiring equal employment opportunity for protected veterans;
3. opposing any act or practice made unlawful by VEVRAA or its implementing regulations, or any other Federal, State or local law requiring equal opportunity for protected veterans; or
4. exercising any other right protected by VEVRAA or its implementing regulations.

Metro's full AAP, absent the data metrics required by 41 CFR § 60-300.44(k), is available for inspection upon request at the location and during the hours that are posted at Metro's establishment at Metro's Human Resources Office.

**Definitions.** For the purposes of this AAP, the term "Protected Veteran" shall be defined as follows, according to the VEVRAA regulations:

Active Duty Wartime or Campaign Badge Veteran means a veteran who served on active duty in the U.S. military, ground, naval, or air service during a war or in a campaign or expedition for which a campaign badge has been authorized, under the laws administered by the U. S. Department of Defense.

Armed Forces Service Medal Veteran means any veteran who, while serving on active duty in the U.S. military, ground, naval, or air service, participated in a United States military operation to which an Armed Forces service medal was awarded pursuant to Executive Order 12985.

Disabled Veteran means:

1. A veteran of the U. S. military, ground, naval, or air service who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs, or
2. A person who was discharged or released from active duty because of a service-connected disability.

Protected Veteran means a veteran who is protected under the non-discrimination and affirmative action provisions of VEVRAA; specifically, a veteran who may be classified as a "disabled veteran," "recently-separated veteran," "active duty wartime or campaign badge veteran," and/or an "Armed Forces Service Medal Veteran" as defined by this AAP and VEVRAA.

Recently-Separated Veteran means any veteran during the three-year period beginning on the date of such veteran's discharge or release from active duty in the U.S. military, ground, naval, or air service.

Pre-JVA veterans are those who would be protected by 41 C.F.R. Part 250 if it were not rescinded, but would not be protected under 41 C.F.R. Part 300.

## **Review of Personnel Processes**

### **41 C.F.R. § 300.44(b)**

Please refer to Metro's Diversity Action Plan for additional steps Metro takes to ensure equal opportunity in the employment process.

1. Metro ensures its personnel processes provide for careful, thorough, and systematic consideration of the job qualifications of applicants and employees who are known protected veterans for job vacancies filled either by hiring or promotion, and for all training opportunities offered or available. Please refer to Metro's Diversity Action Plan for additional steps Metro takes to ensure equal opportunity in the employment process
2. Metro also ensures that when a protected veteran is considered for employment opportunities, Metro complies with all applicable State and Federal regulations.
3. Metro ensures that its personnel processes do not stereotype protected veterans in a manner which limits their access to all jobs for which they are qualified.
4. Metro periodically reviews such processes and makes any necessary modifications to ensure that these obligations are carried out. A description of the review and any necessary modifications to personnel processes or development of new processes is included in this AAP.
5. Metro designs procedures that facilitate a review of the implementation of this requirement by Metro and the Government. The procedures Metro uses are as follows:
  - a. The application or personnel form of each known applicant who is a protected veteran is annotated to identify each vacancy for which the applicant was considered, and the form will be quickly retrievable for review by the Department of Labor and Metro's personnel officials for use in investigations and internal compliance activities.
  - b. The personnel or application records of each known protected veteran includes (i) the identification of each promotion for which the protected veteran was considered, and (ii) the identification of each training program for which the protected veteran was considered.
  - c. In each case where an employee or applicant who is a protected veteran is rejected for employment, promotion, or training, Metro prepares a statement of the reason as well as a description of the accommodations considered (for a rejected disabled veteran). The statement of the reason for rejection (if the reason is medically related), and the description of the accommodations considered, is treated as confidential medical records in accordance with § 60-300.23(d). These materials are available to the applicant or employee concerned upon request.
  - d. Where applicants or employees are selected for hire, promotion, or training and Metro undertakes any accommodation which makes it possible for it to place a

disabled veteran on the job, Metro makes a record containing a description of the accommodation. The record is treated as a confidential medical record in accordance with § 60-300.23(d).

## **Physical and Mental Job Qualifications**

### **41 C.F.R. § 300.23 and 44(c)**

1. Metro adheres to a schedule for the periodic review of all physical and mental job qualification standards to ensure that, to the extent qualification standards tend to screen out qualified disabled veterans, they are job-related for the position and are consistent with job necessity.
2. Whenever Metro applies physical or mental qualification standards in the selection of applicants of employees for employment or other change in employment status such as promotion, demotion or training, to the extent that qualification standards tend to screen out qualified disabled veterans, the standards shall be related to the specific job or jobs for which the individual is being considered and consistent with business necessity. Metro reviews its job descriptions and qualifications to ensure they accurately reflect job duties and responsibilities. The schedule is as follows annually; as new job qualifications are established; and/or, when new equipment is installed.
3. No pre-employment physical examinations or questionnaires are used by Metro prior to a job offer contingent on such examinations and other requirements.
4. Metro may use as a defense to a violation of its obligations in Paragraph 2 above that an individual poses a direct threat to the health or safety of the individual or others in the workplace.
5. When Metro conducts a medical examination or inquiry of a protected veteran it will do so according to the terms and conditions of the VEVRAA and Section 503 regulations, and the results of such an examination or inquiry are kept confidential according to federal and state regulations, which includes the following exceptions:
  - a. Supervisors and managers may be informed regarding restrictions on the work or duties of the applicant or employee and necessary accommodations;
  - b. First aid and safety personnel may be informed, when appropriate, if the disability might require emergency treatment; and,
  - c. Government officials engaged in enforcing the laws administered by the OFCCP regarding individuals with disabilities or protected veterans, or enforcing The Americans with Disabilities Act (“ADA”) and The Americans with Disabilities Act Amendment Act of 2008 (“ADAAA”), shall be provided relevant information on request.

## **Reasonable Accommodation**

### **41 C.F.R. §60-300.44(d)**

1. It is Metro's policy as a matter of nondiscrimination to make reasonable accommodation to the known physical and mental limitations of all otherwise qualified disabled veterans unless it can demonstrate that the accommodation would impose an undue hardship on Metro's business, in accordance with the terms and conditions of Section 503 regulations. Undue hardship will be determined by its definition under applicable regulations under Section 503 including, but not limited to the following: Undue hardship means, with respect to the provision of an accommodation, significant difficulty or expense incurred by the contractor, when considered in light of the factors set forth in 41 CFR § 60-300.2 (aa)(2), such as the overall financial resources of the facility and the impact of the accommodation upon the operation of the facility (this is not an all-inclusive list).

## **Anti-Harassment Procedures**

### **41 C.F.R. § 60-300.44(e)**

Metro has developed and implemented procedures to ensure its employees are not harassed because of their status as a protected veteran.

## External Dissemination of Policy, Outreach, and Positive Recruitment

### 41 C.F.R. § 300.44(f)

In addition to the items below, also refer to Metro's Diversity Action Plan for action item to ensure equal opportunity in the employment process.

1. **Written Notification.** Metro sends written notification of its policy related to affirmative action efforts to all subcontractors, including subcontracting vendors and suppliers, requesting appropriate action on their part.
2. **Examples of outreach and recruitment auditing.** undertakes appropriate outreach and positive recruitment activities such as some of those listed below that are reasonably designed to effectively recruit protected veterans. It is not contemplated that Metro will necessarily undertake all the activities listed below or that its activities will be limited to the items listed below. The scope of Metro's efforts shall depend upon all circumstances, including Metro's size and resources and the extent to which existing employment practices are adequate.
  - a. Enlisting the assistance and support of the following persons and organizations in recruiting, and developing on-the-job training opportunities for veterans, in order to fulfill its commitment to provide meaningful employment opportunities for such veterans:
    - i. The Local Veterans' Employment Representative in the local employment service office (i.e. the One-Stop) nearest Metro's establishment;
    - ii. The Department of Veterans Affairs Regional Office nearest Metro's establishment;
    - iii. The veterans' counselors and coordinators ("Vet-Reps") on college campuses;
    - iv. The service officers of the national veterans' groups active in the area of Metro's establishment;
    - v. Local veterans' groups and veterans' service centers near Metro's establishment;
    - vi. The Department of Defense Transition Assistance Program (TAP), or any subsequent program that, in whole or in part, might replace TAP; and
    - vii. Any organization listed in the Employer Resources section of the National Resource Directory (<http://www.nationalresourcedirectory.gov/>), or any future service that replaces or complements it.
  - b. Metro also considers taking the actions listed below, as appropriate, to fulfill its commitment to provide meaningful employment opportunities to protected veterans:

- i. Formal briefing sessions should be held, preferably on Metro's premises, with representatives from recruiting sources.
  - ii. Metro's facility tours, clear and concise explanations of current and future job openings, position descriptions, worker specifications, explanations of the organization's selection process, and recruiting literature are an integral part of the briefing. At any such briefing sessions, the Metro official in charge of its affirmative action program is in attendance when possible. Formal arrangements should be made for referral of applicants, follow up with sources, and feedback on disposition of applicants.
  - iii. Metro's recruitment efforts at all educational institutions incorporate special efforts to reach students who are protected veterans.
  - iv. An effort is made to participate in work-study programs with Department of Veterans Affairs rehabilitation facilities which specialize in training or educating disabled veterans.
  - v. Protected veterans are made available for participation in career days, youth motivation programs, and related activities in their communities.
  - vi. Metro takes any other positive steps it deems necessary to attract qualified protected veterans not currently in the work force who have requisite skills and can be recruited through affirmative action measures. These persons may be located through the local chapters of organizations of and for any of the classifications of protected veterans.
  - vii. Metro, in making hiring decisions, considers applicants who are known protected veterans for all available positions for which they may be qualified when the position(s) applied for is unavailable.
  - viii. Metro considers listing its job openings with the National Resource Directory's Veterans Job Bank, or any future service that replaces or complements it.
3. **Assessment of external outreach and recruitment efforts.** Metro, on an annual basis, reviews the outreach and recruitment efforts it has taken over the previous twelve months to evaluate their effectiveness in identifying and recruiting qualified protected veterans. Metro documents each evaluation, including at a minimum the criteria it used to evaluate the effectiveness of each effort and Metro's conclusion as to whether each effort was effective. Among these criteria shall be the data collected pursuant to 41 C.F.R. § 60-300.44(k) for the current year and the two most recent previous years. If Metro concludes the totality of its efforts were not effective in identifying and recruiting qualified protected veterans, it shall identify and implement alternative efforts listed in paragraphs (f)(1) or (f)(2) of this section in order to fulfill its obligations.
  4. **Recordkeeping obligation.** Metro documents all activities it undertakes to comply with the obligations of this section, and retain these documents for a period of three (3) years.

## **Internal Dissemination of Policy**

### **C.F.R. § 60-300.44(g)**

In addition to the items below, also refer to Metro's Diversity Action Plan for action item to ensure equal opportunity in the employment process.

1. Metro recognizes that a strong outreach program will be ineffective without adequate internal support from supervisory and management personnel and other employees.
2. Metro implements and disseminates this policy internally as follows:
  - a. includes it in Metro's policy manual or otherwise make the policy available to employees; and
  - b. if Metro is party to a collective bargaining agreement, it notifies union officials and/or employee representatives to inform them of Metro's policy, and request their cooperation.
3. Further, in order to assure greater employee cooperation and participation in Metro's efforts, Metro has developed the internal procedures listed in this section of the AAP for communication of its obligation to engage in affirmative action efforts to employ and advance in employment qualified protected veterans. It is not contemplated that Metro's activities will be limited to those listed. These procedures shall be designed to foster understanding, acceptance and support among Metro's executive, management, supervisory and other employees and to encourage such persons to take the necessary actions to aid Metro in meeting this obligation. Metro additionally considers implementing and disseminating this policy internally as follows:
  - a. Informing all employees and prospective employees of its commitment to engage in affirmative action to increase employment opportunities for protected veterans;
  - b. Publicizing it in Metro's newspaper, magazine, annual report and other media;
  - c. Conducting special meetings with executive, management, and supervisory personnel to explain the intent of the policy and individual responsibility for effective implementation, making clear the chief executive officer's support for the affirmative action policy;
  - d. Discussing the policy thoroughly in both employee orientation and management training programs; and
  - e. When employees are featured in employee handbooks or similar publications for employees, including disabled veterans.

## **Audit and Reporting System**

### **C.F.R. § 60-300.44(h)**

1. Metro has designed and implemented an audit and reporting system that:
  - a. Measures the effectiveness of Metro's AAP;
  - b. Indicates any need for remedial action;
  - c. Determines the degree to which Metro's objectives have been attained;
  - d. Determines whether known protected veterans have had the opportunity to participate in all of Metro's sponsored educational, training, recreational and social activities;
  - e. Measures Metro's compliance with the AAP's specific obligations; and
  - f. Documents the actions taken to comply with the obligations of paragraphs (i) through (v) above, and retain these documents as employment records for three years subject to the recordkeeping requirements of § 60-300.80.
2. Where the affirmative action program is found to be deficient, Metro undertakes necessary action to bring the program into compliance.

## **Responsibility for Implementation of the Plan**

### **1. Identification and Responsibilities of EEO/AA Administrator 41 C.F.R. § 60-300.44(i)**

In furtherance of Metro's commitment to Affirmative Action and Equal Employment Opportunity, overall responsibility for implementing Metro's AAP rests with its EEO/AA Administrator, whose identity should appear on all internal and external communications regarding Metro's AAP. The EEO/AA Administrator shall be given top management support and staff to manage the implementation of this program as it pertains to all applicable laws, orders and regulations, including VEVRAA. Specifically, The Human Resources Director or the designated representative's duties include:

- a. Ensures that Metro lists its job openings in accordance with the requirements of 41 C.F.R. § 300.5.
- b. Ensuring Metro posts in conspicuous places, available to employees and applicants for employment, notices in a form to be prescribed by the OFCCP Director provided by or through the contracting officer. Such notices shall state the rights of applicants and employees as well as Metro's voluntary obligation under the law to take affirmative

action to employ and advance in employment qualified employees and applicants who are protected veterans.

- c. Ensuring Metro's applicants or employees who are disabled veterans are provided the notice in a form that is accessible and understandable to the individual applicant or employee (e.g., providing Braille or large print versions of the notice, or posting a copy of the notice at a lower height for easy viewing by a person using a wheelchair) when an applicant or employee requests the poster in an alternative format, or when Metro knows that an applicant or employee is unable to read the poster because of a disability. Metro may also provide the poster to an applicant or employee who is a disabled veteran in other alternate means, such as on disc or in audio recording, as long as the format provided enables the individual who is a disabled veteran to access the contents of a poster.
- d. Ensuring that, with respect to employees, if any, who do not work at a physical location of Metro, Metro satisfies its posting obligations by posting such notices in an electronic format, provided that Metro provides computers, or access to computers, that can access the electronic posting to such employees, or Metro has actual knowledge that such employees otherwise are able to access the electronically posted notices.
- e. Ensuring electronic notices for employees are posted in a conspicuous location and format on Metro's intranet or sent by electronic mail to employees. An electronic posting is used by Metro to notify job applicants of their rights if Metro utilizes an electronic application process. Such electronic applicant notice are conspicuously stored with, or as part of, the electronic application.
- f. Ensuring that to the extent this requirement is applicable to Metro, Metro notifies labor organizations of its EEO policy as required by 41 C.F.R. § 60-300.44(g).
- g. Ensuring Metro includes the provisions of this clause in every subcontract or purchase order in excess of \$100,000, unless exempted by the rules, regulations, or orders of the Secretary of Labor pursuant to VEVRAA, so that such provisions will be binding upon each subcontractor or vendor, under the terms and conditions of 41 CFR § 60-300.5(a).
- h. Ensuring that all solicitations or advertisements for employees placed by or on behalf of Metro, state that all qualified applicants will receive consideration for employment without regard to their protected veteran status.
- i. Developing, maintaining and, where appropriate, modifying Metro's AAP for protected veterans, policy statements, personnel policies, internal and external communication techniques including discussions with managers, supervisors and employees to ensure Metro's policies are followed, and monitoring the effectiveness of these actions.
- j. Advising supervisors that they are responsible to prevent harassment of employees due to their status as a protected veteran.
- k. Identifying problem areas with line management in the implementation of the program, and helping management develop solutions to any identifiable problem area.

- l. Designing, implementing and overseeing an audit and reporting system to monitor the progress of the organization and the AAP's effectiveness, including auditing the contents of Metro's electronic and hard copy bulletin boards on a regular basis to ensure that compliance information that is posted is up to date.
- m. Serving as liaison between Metro and governmental enforcement agencies, community groups, vocational rehabilitation organizations, and organizations for protected veterans.
- n. Evaluating the effectiveness of Metro's plan on a regular basis, and reporting to management.
- o. Monitoring policies and procedures including the selection, evaluation, promotion and training process with regard to the various terms and conditions of employment to attempt to ensure compliance with affirmative action obligations.
- p. Assisting in ensuring that Metro has processes and procedures: a) to ensure career counseling for employees who are protected veterans, when requested and appropriate; and, b) to review personnel actions, policies, procedures, and employee and applicants' qualifications to ensure protected veterans are treated in accordance with anti-discrimination laws when hiring, promotion, transfer, and termination actions occur.
- q. Keeping management up to date on the latest developments in the areas of EEO and affirmative action.
- r. Assisting in the investigation, handling and disposition of employee discrimination and harassment complaints.
- s. Conducting periodic reviews of offices to ensure compliance in the areas of proper display of posters and notices, and opportunity for participation in Metro-sponsored recreational, educational and social activities.
- t. Overseeing and ensuring that the below self-identification procedures are conducted as set forth in the VEVRAA regulations, using the language and manner prescribed by the OFCCP Director and published on the OFCCP Web site, as follows:
  - i. Pre-offer self-identification invitation procedures for Metro's job applicants as set forth in 41 C.F.R. § 60-300.42 (a); and
  - ii. Post-offer identification procedures for Metro's job applicants as set forth in 41 C.F.R. § 60-300.42 (a).

Further, Metro does not compel or coerce an individual to self-identify as a protected veteran. Metro keeps all information on self-identification confidential, and maintains it in a data analysis file (rather than in the medical files of individual employees) as set forth in 41 C.F.R. § 60-300.23(d). Metro only uses the self-identification information may be used only in accordance with the VEVRAA regulations.
- u. Ensuring that Metro achieves, to the extent possible, its commitment to voluntary compliance under 41 C.F.R. § 60-300.45, which requires that Metro establish

benchmarks, the purpose of which is to create a quantifiable method by which Metro can measure its progress toward achieving equal employment opportunity for protected veterans. The benchmarks will be set on an annual basis by using one of two mechanisms described in this AAP, and will be documented also as set forth in this AAP.

- v. If an applicant identifies himself or herself as a disabled veteran in the post-offer self-identification detailed above, Metro inquires of the applicant whether an accommodation is necessary, and, if so, engages with the applicant regarding reasonable accommodation. Metro may make such inquiries to the extent they are consistent with the Americans with Disabilities Act. Metro maintains a separate file in accordance with Section 60-300.23(d) on persons who have self-identified as disabled veterans.

## **2. Management Responsibilities**

### **41 C.F.R. § 60-300.44(i)**

Line and upper management are advised of their responsibilities for Metro's AAP regarding protected veterans within his or her area of responsibility, including but not limited to their obligations to:

- a. Review Metro's AAP for protected veterans with subordinate managers and supervisors to ensure they are aware of the policy, understand their obligation to comply with it in all personnel actions and understand the need for support at all levels.
- b. Assist in the auditing of plan progress, identification of problem areas, formulation of solutions, establishment of departmental goals and objectives, and development of training programs, when appropriate.
- c. Review the qualifications of applicants and employees in their area of responsibility to ensure protected veterans are treated in a nondiscriminatory manner when hire, promotion, transfer, and termination actions occur.
- d. Review employees' performance to ensure that illegal discrimination regarding protected veterans does not occur.
- e. Make available career counseling to employees who are protected veterans, when so requested, and as appropriate.
- f. Review position descriptions to see that they adequately reflect the job to be performed.
- g. Audit training programs, hiring, and promotion patterns.
- h. Assist subordinates and upper management in the prevention of harassment.
- i. Show support for this AAP.

## **Affirmative Action Training**

### **41 C.F.R. § 60-300.44(j)**

Metro provides training to all personnel involved in the recruitment, screening, selection, promotion, disciplinary and other related processes to ensure that its AAP commitments are implemented.

# **Metro**

**Affirmative Action Program  
for  
Individuals with Disabilities**

**January 1, 2016 through December 31, 2016  
Plan Year**

# **Metro**

## **AFFIRMATIVE ACTION PROGRAM FOR INDIVIDUALS WITH DISABILITIES**

**January 1, 2016 through December 31, 2016  
Plan Year**

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## **Introduction**

Metro is not currently a Federal Contractor; however, Metro sets forth this Affirmative Action Program (“AAP”) for the year from January 1, 2016 through December 31, 2016, reaffirming its voluntary commitment to the spirit and letter of affirmative action law. Through the implementation of this voluntary plan Metro continues its efforts to comply with Section 503 of the Rehabilitation Act of 1973 (“Section 503”) and its implementing regulations, as amended, and to make the best possible use of personnel while contributing to the betterment of society and the community.

In developing this plan, Metro recognizes the importance of ensuring equal employment opportunity for, and to prevent discrimination against, individuals with disabilities. The following statement of policy reinforces that belief.

### **Equal Employment Opportunity Policy Statement 41 C.F.R. § 60-741.44(a)**

In setting forth this plan Metro reaffirms its belief and commitment in equal employment opportunity for all employees and applicants for employment in all terms and conditions of employment. The Human Resources Director, as the EEO Administrator, oversees the plan development, modification, implementation, and reporting requirements and conducts management updates. Metro’s leadership supports Metro’s AAP.

Metro provides for an audit and reporting system regarding Metro’s affirmative action responsibilities under Section 503 regulations, and assigns overall responsibility for the implementation of affirmative action responsibilities under these regulations.

Metro recruits, hires, trains and promotes persons in all job titles, and ensures that all personnel actions are administered without regard to disability; and ensures that all employment actions are based only on valid job requirements. Metro’s employees and applicants are not subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in any of the following activities:

1. filing a complaint with Metro or with Federal, state, or local agencies regarding the status covered under this AAP;
2. assisting or participating in any investigation, compliance review, hearing, or any other activity related to the administration of any Federal, State, or local law requiring equal employment opportunity for individuals with disabilities;
3. opposing any act or practice made unlawful by Section 503 or its implementing regulations, or any other Federal, State or local law requiring equal opportunity for individuals with disabilities; or
4. exercising any other right protected by Section 503 or its implementing regulations in this part.

Metro’s full AAP, absent the data metrics required by 41 CFR § 60-741.44(k), shall be available for inspection upon request at the location and during the hours that are posted at Metro’s establishment at Metro’s Human Resources Office.

## **Review of Personnel Processes 41 C.F.R. § 741.44(b)**

1. Metro ensures its personnel processes provide for careful, thorough, and systematic consideration of the job qualifications of applicants and employees with known disabilities for job vacancies filled either by hiring or promotion, and for all training opportunities offered or available. Please also refer to Metro's Diversity Action Plan for additional step Metro takes to ensure equal opportunity in the employment process.
2. Metro also ensures its personnel processes do not stereotype individuals with disabilities in a manner which limits their access to jobs for which they are qualified.
3. Metro also ensures its applicants and employees with disabilities have equal access to its personnel processes, including those implemented through information and communications technologies.
4. Metro provides necessary reasonable accommodation to ensure applicants and employees with disabilities receive equal opportunity in the operation of personnel processes. Metro periodically reviews such processes and makes any necessary modifications to ensure that these obligations are carried out. Metro designs procedures that facilitate a review of the implementation of this requirement by Metro and any regulating body. A description of the review and any necessary modifications to personnel processes or development of new processes are included in this AAP, and are as follows:
  - a. The application or personnel form of each known applicant who is an individual with a disability is annotated to identify each vacancy for which the applicant was considered, and the form is quickly retrievable for review by the Department of Labor and Metro's personnel officials for use in investigations and internal compliance activities.
  - b. The personnel or application record of each known individual with a disability includes: (i) the identification of each promotion for which the individual with a disability was considered, and (ii) the identification of each training program for which the individual with a disability was considered.
  - c. In each case where an employee or applicant who is an individual with a disability is rejected for employment, promotion, or training, Metro prepares a statement of the reason as well as a description of the accommodations considered. The statement of the reason for rejection (if the reason is medically related), and the description of the accommodations considered, are treated as confidential medical records in accordance with 41 C.F.R. § 60-741.23(d). These materials are available to the applicant or employee concerned upon request.
  - d. Where applicants or employees are selected for hire, promotion, or training and Metro undertakes any accommodation which makes it possible for him

or her to place an individual with a disability on the job, Metro makes a record containing a description of the accommodation. The record is treated as a confidential medical record in accordance with § 60-741.23(d).

### **Review of Physical and Mental Job Qualifications 41 C.F.R. § 60-741.44(c)**

1. Metro has the following schedule for its review of physical and mental job qualification standards to ensure that, to the extent qualification standards tend to screen out qualified people with disabilities, such qualifications are job-related for the position in question and consistent with business necessity, and adheres to this schedule. The schedule is as follows; as new job qualifications are established.
2. Whenever Metro applies physical or mental qualification standards in the selection of applicants or employees for employment or other changes in employment status such as promotion, demotion or training, to the extent that qualification standards tend to screen out qualified individuals on the basis of disability, the standards are related to the specific job or jobs for which the individual is being considered and consistent with business necessity.
3. Metro may use as a defense to a violation of its obligations in Paragraph 2 above that an individual poses a direct threat to the health or safety of the individual or others in the workplace.
4. No pre-employment physical examinations or questionnaires are used by Metro prior to a job offer contingent on such examinations and other requirements.
5. When Metro conducts a medical examination or inquiry of a person with a disability, it will do so according to the terms and conditions of the Federal Regulations implementing Section 503 and relevant State laws, and the results of such an examination or inquiry are kept confidential according to Federal regulations, which includes the following exceptions:
  - a. Supervisors and managers may be informed regarding restrictions on the work or duties of the applicant or employee and necessary accommodations;
  - b. First aid and safety personnel may be informed, when appropriate, if the disability might require emergency treatment; and,
  - c. Government officials engaged in enforcing the laws administered by the OFCCP regarding individuals with disabilities, or enforcing The Americans with Disabilities Act (“the ADA”) and The Americans with Disabilities Act Amendment Act of 2008 (“the ADAAA”), shall be provided relevant information on request.

### **Reasonable Accommodation to Physical and Mental Limitations 41 C.F.R. § 60-741.44(d)**

1. It is Metro's policy, as a matter of nondiscrimination, to make reasonable accommodation to the known physical and mental limitations of all otherwise

qualified individuals with a disability, unless Metro can demonstrate that the accommodation would impose an undue hardship on Metro's business. Undue hardship will be determined by its definition under applicable regulations under Section 503 including, but not limited to the following: Undue hardship means, with respect to the provision of an accommodation, significant difficulty or expense incurred by the contractor, when considered in light of the factors set forth in 41 CFR § 741.2 (aa)(2), such as the overall financial resources of the facility and the impact of the accommodation upon the operation of the facility (this is not an all-inclusive list).

### **Anti-Harassment Procedures 41 C.F.R. § 60-741.44(e)**

Metro has developed and implemented procedures to ensure that its employees are not harassed on the basis of disability.

### **External Dissemination of Policy, Outreach, and Positive Recruitment 41 C.F.R. § 60-741.44(f)**

In addition to the items below, also refer to Metro's Diversity Action Plan for action items to insure equal opportunity in the employment process.

1. Notification. Metro undertakes appropriate outreach and positive recruitment activities that are reasonably designed to effectively recruit qualified individuals with disabilities. It is not contemplated that Metro will necessarily undertake all the activities listed in Paragraph (f)(2) of this section or that its activities will be limited to those listed. The scope of Metro's efforts shall depend upon all the circumstances, including the Metro's size and resources and the extent to which existing employment practices are adequate.
2. Examples of outreach and recruitment activities. Below are examples of outreach and positive recruitment activities Metro may undertake in accordance with Paragraph 1 of this section.
  - a. Enlisting the assistance and support of the following persons and organizations in recruiting, and developing on-the-job training opportunities for individuals with disabilities, in order to fulfill its commitment to provide equal employment opportunity for such individuals:
    - i. the State Vocational Rehabilitation Service Agency ("SVRA"), State mental health agency, or State developmental disability agency in the area of the contractor's establishment;
    - ii. the Employment One-Stop Career Center (One-Stop) or American Job Center nearest the contractor's establishment;

- iii. the Department of Veterans Affairs Regional Office nearest Metro's establishment ([www.va.gov](http://www.va.gov));
  - iv. entities funded by the Department of Labor that provide recruitment or training services for individuals with disabilities, such as the services currently provided through the Employer Assistance and Resource Network (EARN) ([www.earnworks.com](http://www.earnworks.com));
  - v. local Employment Network ("EN") organizations (other than Metro, if Metro is an EN) listed in the Social Security Administration's Ticket to Work Employment Network Directory ([www.yourtickettowork.com/endir](http://www.yourtickettowork.com/endir));
  - vi. local disability groups, organizations, or Centers for Independent Living (CIL) near the contractor's establishment;
  - vii. placement or career offices of educational institutions that specialize in the placement of individuals with disabilities; and
  - viii. private recruitment sources, such as professional organizations or employment placement services that specialize in the placement of individuals with disabilities.
- b. In addition, Metro has considered taking the actions listed below to fulfill its commitment to provide equal employment opportunities to individuals with disabilities. It is not contemplated that Metro will necessarily undertake all of the activities listed below.
- i. Formal briefing sessions held, preferably on Metro's premises, with representatives from recruiting sources. Metro's facility tours, clear and concise explanations of current and future job openings, position descriptions, worker specifications, explanations of Metro's selection process, and recruiting literature are an integral part of any such briefing. At any such briefing sessions, Metro's official in charge of Metro's AAP should be in attendance when possible. Formal arrangements are made for referral of applicants, follow up with sources, and feedback on disposition of applicants, from any such briefings.
  - ii. Metro's recruitment efforts at all educational institutions incorporate special efforts to reach students who are individuals with disabilities.
  - iii. Metro makes an effort to participate in work-study programs for students, trainees, or interns with disabilities in programs

found through outreach, such as to State and local schools and universities, and through EARN.

- iv. Individuals with disabilities may be made available for participation in Metro's career days, youth motivation programs, and related activities in Metro's communities.
  - v. Metro takes any other positive steps it deems necessary to attract individuals with disabilities not currently in the work force who have requisite skills and can be recruited through affirmative action measures. These individuals may be located through State and local agencies supported by the U.S. Department of Education's Rehabilitation Services Administration (RSA) (<http://rsa.ed.gov/>), local Ticket-to-Work Employment Networks, or local chapters of groups or organizations that provide services for individuals with disabilities.
  - vi. Metro, in making hiring decisions, considers applicants who are known to have disabilities for all available positions for which they may be qualified when the position(s) applied for is unavailable.
3. Assessment of external outreach and recruitment efforts. Metro on an annual basis, reviews the outreach and recruitment efforts it has taken over the previous twelve months to evaluate its effectiveness in identifying and recruiting qualified individuals with disabilities. Metro documents each evaluation, including at a minimum the criteria it used to evaluate the effectiveness of each effort and Metro's conclusion as to whether each effort was effective. Among these criteria shall be the data Metro collected pursuant to 41 C.F.R. § 741.44(k) for the current year and the two most recent previous years. If Metro concludes the totality of its efforts were not effective in identifying and recruiting qualified individuals with disabilities, it identifies and implements alternative efforts listed in Paragraph 2 above in order to fulfill its obligations.
  4. Written Notification of Policy. Metro sends written notification of its policy relating to its affirmative action efforts to all subcontractors, including subcontracting vendors and suppliers, requesting appropriate action on their part.
  5. Documentation. Metro documents all activities it undertakes to comply with the obligations of this section, and retains these documents for a period of three (3) years.

### **Internal Dissemination of Policy 41 C.F.R. § 60-741.44(g)**

In addition to the items below, also refer to Metro's Diversity Action Plan for action item to insure equal opportunity in the employment process.

1. Metro recognizes that even a strong outreach program for individuals with disabilities may be ineffective without adequate internal support from its supervisors and employees. Therefore, to ensure greater employee cooperation and participation in Metro's efforts regarding its obligation to engage in affirmative action efforts to employ and advance in employment qualified individuals with disabilities, Metro has developed the following internal procedures. These procedures have been designed to foster understanding, acceptance and support among Metro's executive, management, supervisory, and other employees to encourage such persons to take the necessary actions to aid the contractor in meeting this obligation.
2. Metro implements and disseminates this policy internally as follows:
  - a. includes the policy in Metro's policy manual or otherwise makes the policy available to employees; and
  - b. where Metro is a party to a collective bargaining agreement, it notifies union officials and/or employee representatives of the contractor's policy and request their cooperation;
3. Below are some of the other methods Metro may additionally use to implement and disseminate this policy internally:
  - a. informs all employees and prospective employees of Metro's commitment to engage in affirmative action to increase employment opportunities for individuals with disabilities;
  - b. periodically schedules special meetings with all employees to discuss the policy and explain individual employee responsibilities;
  - c. publicizes the policy in Metro's newspaper, magazine, annual report and other media;
  - d. conducts special meetings with executive, management, and supervisory personnel to explain the intent of the policy and individual responsibility for effective implementation making clear Metro's chief executive officer's support for the affirmative action policy;
  - e. discusses the policy thoroughly in both employee orientation and management training meetings;
  - f. includes articles on accomplishments of individuals with disabilities in Metro's publications; and
  - g. when employees are featured in employee handbooks and similar publications, includes individuals with disabilities.

## **Audit and Reporting System 41 C.F.R. § 60-741.44(h)**

Metro has designed and has implemented an audit and reporting systems that:

1. Measures the effectiveness of Metro's affirmative action program.
2. Indicates any need for remedial action.
3. Determines the degree to which Metro's affirmative action objectives have been attained.
4. Determines whether known individuals with disabilities have had the opportunity to participate in all company sponsored-educational, training, recreational and social activities.
5. Measures Metro's compliance with the AAP's specific obligations.
6. Documents the actions taken to comply with the obligations of Paragraphs (1) through (5) of this section, and retain these documents as employment records for a period of three years from the date of making of the record.
7. Where Metro, upon its review, finds its AAP to be deficient and need further progress, Metro undertakes necessary action to bring the program into compliance.

## **Responsibility for Implementation of the Plan 41 C.F.R. § 60-741.44(i)**

### **1. Identification and Responsibilities of the EEO/AA Administrator. 41 C.F.R. § 60-741.44(i)**

In furtherance of Metro's commitment to Affirmative Action and Equal Employment Opportunity, overall responsibility for implementing Metro's AAP rests with its EEO/AA Administrator, whose identity appears on all internal and external communications regarding Metro's AAP. The EEO/AA Administrator has been given the necessary senior management support and staff to manage the implementation of this AAP. Specifically, The Human Resources Director or the designated representative's duties include the following, all of which are administered in accordance with the Section 503 regulations:

- a. Ensuring Metro posts in conspicuous places, available to employees and applicants for employment, notices in a form to be prescribed by the OFCCP Director provided by or through the contracting officer. Such notices shall state the rights of applicants and employees as well as Metro's voluntary commitment under the law to take affirmative action to employ and advance in employment qualified employees and applicants with disabilities.
- b. Ensuring Metro's applicants or employees with disabilities are provided the notice in a form that is accessible and understandable to the individual applicant or employee (e.g., providing Braille or large print versions of the notice, or posting a copy of the notice at a lower height for easy viewing by a person using a wheelchair) when an applicant or employee requests the poster in an alternative format, or when Metro knows that an applicant or employee is unable to read the poster because of a disability. Metro may also provide the poster to an applicant or employee with a disability in other alternate

means, such as on disc or in audio recording, as long as the format provided enables the individual with a disability to access the contents of a poster.

- c. Ensuring that, with respect to employees, if any, who do not work at a physical location of Metro, Metro satisfies its posting obligations by posting such notices in an electronic format, provided that Metro provides computers, or access to computers, that can access the electronic posting to such employees, or Metro has actual knowledge that such employees otherwise are able to access the electronically posted notices.
- d. Ensuring electronic notices for employees are posted in a conspicuous location and format on Metro's intranet or sent by electronic mail to employees. An electronic posting is used by Metro to notify job applicants of their rights if Metro utilizes an electronic application process. Such electronic applicant notice are conspicuously stored with, or as part of, the electronic application.
- e. Ensuring that to the extent this requirement is applicable to Metro, Metro notifies labor organizations of its EEO policy as required by 41 C.F.R. § 60-741.44(g).
- f. Ensuring Metro includes the provisions of this clause in every subcontract or purchase order in excess of \$10,000 under the terms and conditions of 41 CFR 60-741.5(a).
- g. Ensuring that all solicitations or advertisements for employees placed by or on behalf of Metro, state that all qualified applicants will receive consideration for employment and will not be discriminated against on the basis of disability.
- h. Developing, maintaining and, where appropriate, modifying Metro's AAP for individuals with disabilities, policy statements, personnel policies, internal and external communication techniques including discussions with managers, supervisors and employees to ensure Metro's policies are followed, and monitoring the effectiveness of these actions.
- i. Advising supervisors that they are responsible for preventing harassment of employees due to their status as individuals with disabilities.
- j. Ensuring affirmative action training is conducted in accordance with 41 C.F.R. § 60-741.44(j).
- k. Identifying problem areas with line management in the implementation of the program, and helping management develop solutions to any identifiable problem area.
- l. Designing, implementing and overseeing an audit and reporting system to monitor the progress of Metro and the AAP's effectiveness, including auditing the contents of Metro's electronic and hard copy bulletin boards on a regular basis to ensure that compliance information that is posted is up to date and accessible to applicants and employees with disabilities.
- m. Serving as liaison between Metro and governmental enforcement agencies, community groups, vocational rehabilitation organizations, and organizations for individuals with disabilities.

- n. Evaluating the effectiveness of Metro's plan on a regular basis, as described in this AAP, and reporting to management.
- o. Monitoring policies and procedures including the selection, evaluation, promotion and training process with regard to the various terms and conditions of employment to attempt to ensure compliance with affirmative action obligations.
- p. Overseeing Metro's processes and procedures: a) to ensure that career counseling for employees with known disabilities, when requested and appropriate; and, b) to review personnel actions, policies, procedures, and employee and applicants' qualifications to ensure individuals with disabilities are treated in accordance with anti-discrimination laws when hiring, promotion, transfer, and termination actions occur.
- q. Keeping management up to date on the latest developments in the areas of EEO and affirmative action.
- r. Assisting in the investigation, handling and disposition of employee discrimination and harassment complaints.
- s. Conducting periodic reviews of offices to ensure compliance in the areas of proper display of posters and notices, and opportunity for participation in Metro-sponsored recreational, educational and social activities.
- t. Overseeing and ensuring that the below self-identification procedures are conducted as set forth in the Section 503 regulations, using the language and manner prescribed by the OFCCP Director and published on the OFCCP Web site, as follows:
  - i. Pre-offer self-identification invitation procedures for Metro's job applicants as set forth in 41 C.F.R. § 60-741.42 (a);
  - ii. Post-offer identification procedures for Metro's job applicants as set forth in 41 C.F.R. § 60-741.42 (a); and
  - iii. Self-identification invitation procedures for Metro's employees as set forth in 41 C.F.R. § 60-741.42 (a).

Ensuring that Metro does not compel or coerce an individual to self-identify as an individual with a disability, and that Metro keeps all information on self-identification confidential, and maintains it in a data analysis file (rather than in the medical files of individual employees) as set forth in 41 C.F.R. § 60-741.23(d). Metro only uses the self-identification information may be used only in accordance with the Section 503 regulations.

- u. Ensuring that Metro annually evaluates its utilization of individuals with disabilities in each job group, or in its entire workforce in accordance with 41 C.F.R. § 60-741.45, including the following:
  - i. Ensuring that when the percentage of individuals with disabilities in one or more job groups, or in Metro's entire workforce, as applicable, is less than the utilization goal established in the Section 503 regulations, Metro takes steps to determine whether and where impediments to equal employment

opportunity exist. When making this determination, Metro assesses its personnel processes, the effectiveness of its outreach and recruitment efforts, the results of its affirmative action program audit, and any other areas that might affect the success of its AAP.

- ii. Ensuring that Metro develops and executes action-oriented programs designed to correct any identified problem areas. These action-oriented programs may include the modification of personnel processes to ensure equal employment opportunity for individuals with disabilities, alternative or additional outreach and recruitment efforts from among those listed in 41 CFR § 60-741.44 (f)(1) and (f)(2), and/or other actions designed to correct the identified problem areas and attain the established goal.

## **2. Management Responsibilities 41 C.F.R. § 60-741.44(i)**

Line and upper management are advised of their responsibilities for Metro's AAP regarding individuals with disabilities within his or her area of responsibility, including but not limited to their obligations to:

- a. Review Metro's AAP for individuals with disabilities with subordinate managers and supervisors to ensure they are aware of the policy, understand their obligation to comply with it in all personnel actions and understand the need for support at all levels.
- b. Assist in the auditing of plan progress, identification of problem areas, formulation of solutions, establishment of departmental goals and objectives, and development of training programs, when appropriate.
- c. Review the qualifications of applicants and employees in their area of responsibility to ensure qualified individuals with disabilities are treated in a nondiscriminatory manner when hire, promotion, transfer, and termination actions occur.
- d. Review employees' performance to ensure that illegal discrimination regarding individuals with disabilities does not occur.
- e. Make available career counseling to employees with known disabilities, when so requested, and as appropriate.
- f. Review position descriptions to see that they adequately reflect the job to be performed.
- g. Audit training programs, hiring, and promotion patterns.
- h. Assist employees and other members of management in the prevention of harassment.
- i. Show support for Metro's AAP.

**Affirmative Action Training 41 C.F.R. § 60-741.44(j)**

Metro provides training and guidance to all personnel who are involved in the recruitment, screening, selection, promotion, disciplinary and other related processes to ensure that its AAP commitments are implemented.

# Metro | *Policies and procedures*

**Subject** Discrimination and Harassment  
**Section** Human Resources  
**Approved by** Martha Bennett, Chief Operating Officer; MERC Commission

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## **POLICY**

*Metro is committed to promoting and maintaining a work environment that is free from all forms of discrimination, harassment, intimidation, hostility and offensive behavior.*

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## **Applicable to**

All employees, elected officials, interns, volunteers, visitors, contractors and vendors.

*Where provisions of an applicable collective bargaining agreement directly conflict with this policy, the provisions of that agreement will prevail.*

## **Definitions**

**Discrimination:** An act having adverse effect on one or more individuals because of race, color, religion, sex, national origin, age, marital status, familial status, gender identity, sexual orientation, veteran status, disability or perceived disability, or any other status protected by law. It may be intentional or unintentional.

**Harassment:** Behavior which is reasonably perceived by the recipient as unwelcome and includes, but is not limited to, the use of verbal/written derogatory or discriminatory statements, denigrating jokes, unwelcome touching, offensive remarks, put-downs, epithets, slurs or negative stereotyping, displays, objects or materials which create an offensive work environment. Harassment has the purpose or effect of creating an intimidating, hostile, abusive or offensive work environment; unreasonably interfering with an individual's work performance; or otherwise adversely affecting an individual's employment and employment related opportunities.

Harassment does not refer to behavior or occasional compliments of a socially acceptable nature. It refers to behavior that is not welcome, offensive, fails to respect the rights of others, lowers morale, and/or interferes with work effectiveness.

**Unlawful Harassment:** Any harassment as defined above that is based on a protected class status or singles someone out because of their protected class, and where: 1) enduring the offensive conduct becomes a condition of continued employment, or 2) the conduct is severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive.

**Retaliation:** Treating someone negatively or differently because that person has filed a complaint under this policy, exercised his or her rights under state or federal law, or participated in a harassment investigation.

Protected Class: Any individual or group of individuals for whom there is an established law prohibiting discrimination, harassment, or retaliation. Examples of protected classes are race, color, religion, sex, national origin, age, marital status, familial status, gender identity, sexual orientation, veteran status or disability.

## **Guidelines**

1. Any practice or behavior which acts to discriminate against or harass an employee, intern, volunteer or applicant because of his or her race, color, religion, sex, national origin, age, marital status, familial status, gender identity, sexual orientation, veteran status, disability or perceived disability, or any other status protected by law, is in direct conflict with Metro's commitment to ensuring a discrimination and harassment-free work environment. Such behavior, or tolerance of such behavior, on the part of management or employees violates Metro's policy and may result in disciplinary action up to and including termination, even if the conduct does not necessarily constitute a violation of the law.
2. This policy applies to all conduct on any of Metro's premises and to conduct off Metro's premises that has an effect on an employee's work environment.
3. No employee, elected official, intern, volunteer, visitor, contractor or vendor may engage in any of the following conduct (this list represents examples and is not intended to be all-inclusive):
  - a. Making unwelcome sexual advances, requesting for sexual favors, or engaging in other inappropriate verbal or physical conduct of a sexual nature.
  - b. Making stereotypical offensive comments, jokes, innuendo or threats about a person's protected class status (e.g. race, color, religion, sex, national origin, age, marital status, familial status, gender identity, sexual orientation, veteran status or disability).
  - c. Bringing suggestive or offensive objects or pictures, cartoons, or graphics onto Metro premises, either electronically or otherwise.
  - d. Making suggestive or insulting sounds or obscene gestures, leering, staring, or whistling.
  - e. Making unwanted physical contact with others, such as touching, grabbing, pinching, brushing the body, neck or back rubs, coerced sexual intercourse or assault.
4. Management and elected officials must demonstrate by their own conduct that they support and enforce Metro's policy. For example, managers must take prompt action when they observe inappropriate conduct or when a complaint is made, and are expected to provide leadership in carrying out the policy's intent. If a manager learns of any potential discrimination or harassment in the workplace, they must immediately contact the Metro Human Resources department.

## **Procedures**

### **Complaint Procedure**

1. Any employee, intern, volunteer or elected official subjected to discrimination or harassment is encouraged to proceed under the Complaint Procedure in this policy. Individuals who observe or who are aware of situations involving discrimination or harassment should immediately notify their supervisor, the Human Resources Director, or any other manager at

Metro. Discretion will be used during the investigation in order to maintain as much confidentiality as is possible without compromising the ability to effectively complete the investigation.

- a. If a complaint, whether informal or formal, is concerning a Councilor, the complaint shall be forwarded to the Council President or Human Resources Director. If the complaint, whether informal or formal, is about the Council President, the complaint shall be forwarded to the Deputy Council President or Human Resources Director.
  - b. If a complaint, whether informal or formal, is about the Chief Operating Officer, the complaint shall be forwarded to the Council President or Human Resources Director.
  - c. If a complaint, whether informal or formal, is about the Auditor, the complaint shall be forwarded to the Chief Operating Officer or Human Resources Director.
  - d. If a complaint, whether informal or formal, is concerning the Human Resources Director, the complaint shall be forwarded to the Chief Operating Officer.
  - e. If a complaint, whether informal or formal, is about the Metro Attorney, the complaint shall be forwarded to the Council President or Human Resources Director.
2. Formal Complaint Procedure: A formal complaint alleging an act of discrimination or harassment by an employee, elected official, intern, volunteer, visitor, contractor or vendor may be submitted in writing to the Human Resources Director.
- a. A written complaint should include the following information:
    - i. the complainant's name and protected class status (e.g., race, religion, sex, national origin, disability, age, veteran status, sexual orientation, etc.) if applicable;
    - ii. the nature of the complaint, the date the alleged violation occurred, the name of the person who is the subject of the complaint, and the names of any witnesses present; and
    - iii. if the complaint is in regard to a vendor, contractor or subcontractor, the name of that organization.
  - b. The Human Resources Director or his or her designee shall:
    - i. thoroughly investigate the complaint and establish a file of findings;
    - ii. submit the findings with a recommendation to the Department Director or his or her designee;
    - iii. inform the alleged harasser of the determination and any action to be taken; and
    - iv. notify the complainant that the investigation has been completed and relevant avenues of appeal, if appropriate.
3. Informal Complaint Procedure: Some individuals alleging an act of unlawful discrimination or harassment may wish to go through an informal process. The following informal procedure is established to address that need; however, a person making a complaint is not required to use this procedure either in lieu of or prior to proceeding with a formal complaint.

- a. Any person alleging an act of discrimination or harassment by another employee, elected official, intern, volunteer, visitor, contractor or vendor has occurred, may verbally request an informal investigation of the allegation by either his or her Manager/Director, or the Human Resources Director.
  - b. The Manager/Director, or Human Resources Director or his or her designee shall, after appropriate investigation of the complaint, determine what informal remedial action, if any, shall be taken. The Manager/Director, or Human Resources Director or his or her designee shall inform the complainant and alleged harasser of the determination and any action to be taken. The details of any disciplinary action taken against the alleged harasser will not be disclosed to the complainant.
  - c. If the complainant does not feel that the informal procedure satisfactorily resolves his or her complaint, or if the complainant does not want to initiate the informal procedure, he or she may proceed with the formal complaint procedure described above.
  - d. All management and supervisory personnel who have received a report or complaint of discrimination or harassment shall immediately inform Metro's Human Resources Director. The Human Resources Director shall make arrangements for the prompt and proper investigation of such report or complaint.
  - e. Discretion will be used during the investigation in order to maintain as much confidentiality as possible while still being able to effectively complete the investigation.
4. Job Applicant Complaint Procedure: Any individual who has made application for employment and alleges that an act of unlawful discrimination has occurred may file a complaint in writing to the Human Resources Director as set forth in the formal procedure outlined above.

### **Retaliation**

5. An employee, intern or volunteer who files a complaint of discrimination or harassment, participates in the investigation of a complaint, or reports or opposes harassing or discriminatory behavior shall not be subject to adverse treatment as a result of such activity. In addition, any individual who is the subject of, or is aware of, a complaint must refrain from taking any retaliatory actions against the person who complained, or against others participating in the investigation.
6. Any form of retaliation related to a discrimination or harassment complaint may result in discipline up to and including termination.
7. Any employee, intern or volunteer who believes he or she has been retaliated against for filing a complaint or otherwise participating in any investigation under this policy should immediately report the circumstances to the Human Resources Director.

### **Responsibilities**

#### Employee/Intern/Volunteer:

- Demonstrate support of the policy by your own conduct; refrain from engaging in behaviors which constitute harassment, discrimination or retaliation.

- If you are comfortable doing so, tell employees or other individuals who violate this policy to stop the offensive behavior.
- Immediately notify your supervisor, Human Resources Director or any Metro manager if you observe or are aware of situations involving discrimination, harassment or retaliation in the workplace.

Director/Manager/Supervisor:

- Monitor and ensure that the work environment is free from discrimination, harassment and retaliation.
- Demonstrate support and enforcement of the policy by your own conduct, and provide leadership in carrying out this policy's intent.
- Take all complaints of discrimination or harassment seriously.
- Immediately notify Human Resources if you learn of any actual or potential discrimination, harassment or retaliation in the workplace.

Human Resources:

- Upon notification of potential discrimination, harassment or retaliation in the workplace, immediately conduct a thorough investigation.
- Take appropriate action in order to end discrimination, harassment or retaliation in the workplace.

**References**

Title VII of the Civil Rights Act of 1964 (Pub. L. 88-352) (Title VII), as amended, 42 U.S.C. § 2000e *et seq.*

ORS 659A.030

2013 Oregon Laws Ch. 379 (House Bill 2669)

Additional information can be obtained from the Oregon Bureau of Labor and Industries ([www.boli.state.or.us](http://www.boli.state.or.us)) or the Equal Employment Opportunity Commission ([www.eeoc.gov](http://www.eeoc.gov)).

# Metro | *Policies and procedures*

<b>Subject</b>	Equal Opportunity and Affirmative Action
<b>Section</b>	Human Resources
<b>Approved by</b>	Martha Bennett, Chief Operating Officer; MERC Commission

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## **POLICY**

*It is the policy of Metro to ensure that equal employment opportunity exists for all applicants, employees and interns without regard to race, color, religion, sex, national origin, age, marital status, familial status, gender identity, sexual orientation, disability, veteran status, or any other status protected by law. Equal opportunity and consideration will be given in all phases of employment, including recruiting, selecting, hiring, transferring, promoting, compensating and terminating employees. Metro maintains an affirmative action plan to foster inclusion of under-represented groups in the workforce.*

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## **Applicable to**

All employees, interns and applicants.

## **Definitions**

**Equal Opportunity:** Fair treatment of applicants, interns and employees in all aspects of personnel administration without regard to race, color, religion, sex, national origin, age, marital status, familial status, gender identity, sexual orientation, disability, veteran status, or any other protected class under state and/or federal law.

**Affirmative Action:** A set of specific and result-oriented procedures through which Metro works to promote equal employment opportunities and non-discriminatory practices.

**Affirmative Action Plan:** The affirmative action plan informs and directs the organization to foster inclusion of under-represented groups in the workforce. It includes a biennial report outlining Metro's utilization of women and minorities in its workforce as it compares to the availability of qualified women and minorities in their respective recruitment area. Goals and action items are established based on the utilization data and the Diversity Action Plan.

## **Guidelines**

1. All Metro employees will work to promote the intent and requirements of this policy in all employment, employee relations, internships and personnel practices.
2. Recruitment, selection, and promotion of employees will be based on the employee's knowledge, skills, and abilities as they relate to the requirements of the job, and will be administered without regard to any legally protected class except where there is a bona fide occupational qualification. All other aspects of personnel administration will be administered based on job-related criteria or seniority. Metro internships will also comply with all applicable laws and policies related to equal opportunity and non-discrimination.

## Procedures

1. Metro will update and distribute an agency affirmative action plan on a regular basis; analyze the plan to identify underutilization of women and minorities in the workforce; and provide outreach to underutilized groups.
2. Metro will regularly review recruitment and selection procedures and other personnel processes for instances of perceived disparate impact on protected groups and will revise procedures and processes as appropriate to maintain equity.
3. Metro will provide a complaint procedure to address complaints of discrimination and harassment and will investigate and address complaints as appropriate. (Metro's Discrimination and Harassment policy outlines the complaint procedure).
4. The Human Resources Director will serve as the agency's designated Affirmative Action Officer, and will manage and implement Metro's Affirmative Action Plan.

## Responsibilities

### Employees:

- Help ensure that the work environment is free of discrimination and harassment.
- Adhere to this policy by supporting equal opportunity for all employees and interns.
- Refrain from engaging in harassment and discrimination.
- Uphold all employee values, specifically that of respect.

### Supervisors:

- Make employment-related decisions based on job-related criteria.
- Seek assistance from Human Resources as needed to understand and carry out responsibilities as they relate to equal opportunity.
- Monitor the workplace to help ensure there is no harassment or discrimination.

### Human Resources Department:

- Undertake a program of affirmative action to communicate, particularly to minorities, women, persons with disabilities, and veterans, that employment opportunities are available based on individual merit, and to actively encourage all persons to seek employment and to strive for advancement.
- Update the Affirmative Action Program Utilization and Availability Analysis every two years or as required to maintain effective conformance with this equal opportunity policy.
- Determine appropriate steps and take necessary action if a complaint is initiated relating to this policy.

## References

- Metro Affirmative Action Plan
- Discrimination and Harassment Policy