



## Equal Employment Opportunity Policy (EEO)

Jackson Area Transportation Authority is committed to equal employment opportunity and dedicated to creating a work environment that fosters diversity and promotes excellence.

FY2022

2350 East High Street  
Jackson, Michigan 49203

<b>Revision Date</b>	<b>Authors</b>	<b>Version</b>	<b>Section</b>	<b>Summary</b>
9/29/2021	Ryan F. Smith	V2	All	Updated organizational chart, updated policy statement, and made general edits for content and grammar as needed.
3/30/2022	Ryan F. Smith	V3	Org. Structure	Updated organizational chart to reflect changes in positions.

# Statement of Policy



## Equal Employment Opportunity Policy Statement

The Jackson Area Transportation Authority (JATA) has a strong commitment to the community we serve and our employees. JATA is an Equal Employment Opportunity (EEO) employer for all employees and applicants for employment, regardless of their race, religion, color, sex (including pregnancy, gender identity and sexual orientation), national origin, age, genetic information, veteran status, disability or other protected class. All employees will have the freedom to compete on a fair and level playing field with equal opportunity for competition.

JATA's EEO policy applies to all personnel/employment programs, management practices and decisions, including but not limited to; recruitment/hiring, selection for training, merit promotion, transfer, reassignments, career development, benefits, separation, demotion, rates of pay or other forms of compensation, and use of facilities.

Workplace harassment will not be tolerated, and JATA will correct the harassing conduct before it becomes severe or pervasive. Reprisal against one who engaged in protected activity will not be tolerated, and JATA supports the rights of all employees to exercise their rights under the civil rights statutes. All applicants and employees have the right to file complaints alleging discrimination. As JATA's Executive Director, I maintain overall responsibility and accountability for JATA's compliance with its EEO Policy and Program. To ensure day-to-day management, including program preparation, monitoring, and complaint investigation, I have appointed the Government and Community Relations Manager, as JATA's EEO Officer. The Government and Community Relations Manager will report directly to me and acts with my authority with all levels of management, labor unions, and employees.

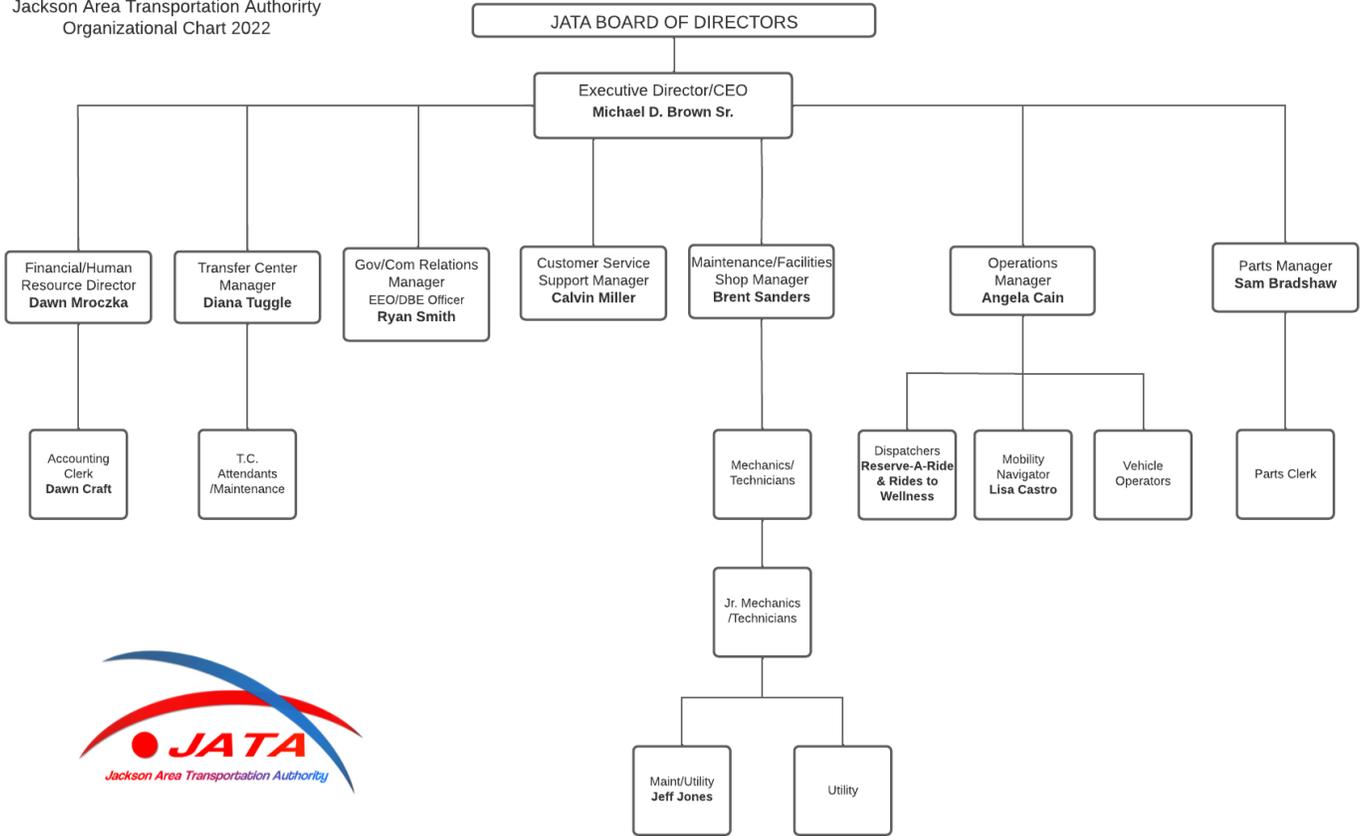
All JATA executives, management, and supervisory personnel, however, share in the responsibility for implementing and monitoring JATA's EEO Policy and Program within their respective areas and will be assigned specific tasks to ensure compliance is achieved. JATA will evaluate its managers' and supervisors' performance on their successful implementation of JATA's policies and procedures, in the same way JATA assesses their performance regarding other agency's goals. JATA is committed to undertaking and developing a written nondiscrimination program that sets forth the policies, practices and procedures, with goals and timetables, to which the agency is committed and make the Equal Employment Opportunity Program (EEO) available for inspection by any employee or applicant for employment upon request. I am personally committed to a workplace that acts upon its daily responsibility to treat all applicants and employees with dignity and respect, and equitably under the guidelines of our EEO Policy and Program.

  
Michael D. Brown Sr.  
Executive Director

9/29/21  
Date

# Organizational Structure

Jackson Area Transportation Authority  
Organizational Chart 2022



## **EEO Dissemination Plan**

JATA recognizes the value of a diverse workforce and is committed to communicating its EEO policies and procedures to employees and prospective employees. To ensure EEO policies are effectively circulated, JATA has taken the following actions:

### ***Internal Dissemination***

- The Government and Community Relations Manager serves as the EEO Officer for the agency and reports directly to the Executive Director. This individual provides EEO information and updates during weekly administrative meetings and additional information and support to supervisors and managers as needed.
- The Equal Employment Opportunity Program (EEO) is available upon request at our administrative building located at 2350 E. High Street in Jackson or by calling JATA's main line at (517) 787-8363.
- The EEO policy statement is incorporated into the Employee Manual which is provided to all new employees upon hire.
- EEO policies and procedures are discussed during new employee orientation sessions.
- Copies of the EEO policy statement are posted in JATA's two employee lounges.
- Required EEO materials (e.g. Federal and state labor laws posters) are posted in JATA's two employee lounges.
- An EEO Task Force, whose role is to suggest improvements in the program, meets semi-annually. Notes are kept and distributed to officials, and managers, upon request.
- Non-discrimination clauses are included in all collective bargaining agreements.
- Included in all training opportunity announcements, internal job postings and other such notices is a statement that JATA is an equal opportunity employer.

### ***External Dissemination***

- Copies of the EEO policy statement are posted in the public lobby of the administration building, and on the public information board at the Downtown Transfer Center.
- Advertise employment opportunities in local newspapers and on social media as needed.
- Include in all employment advertisements a statement that JATA is an equal opportunity employer.
- Appropriate equal employment opportunity references and clauses are incorporated in contracts and purchase orders.
- All job positions that become available are advertised on the Employment Opportunities section of JATA's website, under the statement "JATA is an equal opportunity employer". A PDF of JATA's EEO Policy is also available for download on the page.

## **Duties and Responsibilities**

### ***JATA Executive Director***

Ultimate responsibility for the implementation of this policy and the Technical Assistance Program Seminars (TAPS) affirmative action program rests with the JATA Executive Director. The Executive Director's responsibilities may include:

- Assisting in identifying problem areas and establishing agency and unit goals and objectives;
- Being actively involved with local minority organizations, women's and handicapped groups, community organizations and community service programs designed to promote EEO;
- Participating actively in periodic audits of all aspects of employment in order to identify and to remove barriers obstructing the achievement of specified goals and objectives;
- Holding regular discussions with managers, supervisors, and employees to assure the agency's policies and procedures are being followed;
- Reviewing the qualifications of all employees to assure that minorities, disabled persons, and women are given full opportunities for transfer, promotions, training, salary increases, and other forms of compensations;
- Participating in the review and/or investigation of complaints alleging discrimination;
- Conducting and supporting career counseling for all employees;
- Participating in periodic audits to ensure that each agency unit complies (e.g., EEO posters are properly displayed on all employees' bulletin boards).

### ***Equal Employment Opportunity (EEO) Officer***

The Government and Community Relations Manager will assume the position of the Equal Employment Opportunity Officer and perform the following duties and functions:

- Developing and recommending an EEO policy, a written program, and internal and external communication procedures;
- Assisting the Office Manager in collecting and analyzing employment data, identifying problem areas, setting goals and timelines, and developing programs to achieve goals; Assuring that current legal information affecting affirmative action is disseminated to responsible officials;
- Providing training and answering staff questions as needed;
- Assisting in recruiting minority, women and disabled applicants and establishing outreach sources;
- Process employment discrimination complaints.

### ***Other Directors, Managers, and Supervisors***

Each member of management and supervision is responsible within his/her area of responsibility for conducting activities in a manner which will ensure compliance with the policy and the EEOP. Furthermore, each is made to understand that his/her work performance in equal employment is being evaluated.

## **Assessment of Employment Practices**

### ***Recruitment***

Applicants for employment are considered and placed without regard to race, color, religion, national origin,

sex (including gender identity, sexual orientation, and pregnancy), age, genetic information, disability, veteran status, or other protected class. JATA displays equal employment opportunity notices in conspicuous places available to all employees and applicants for employment. Employment application forms follow applicable federal laws. A copy of our EEO Policy may be obtained from the EEO Officer or any manager or director.

Applications contain a brief EEO statement and provide an opportunity for applicants to report their race, gender, disability and veteran status. It is made clear that this information is voluntary and is used only for record keeping purposes. The questions are on a separate page from the rest of the application. This page is removed and filed by the Office Manager prior to handing the application over to the hiring manager or supervisor.

To not adversely impact the employment opportunities of minorities and women, hiring managers and supervisors are counseled to develop a better understanding of the characteristics of the minority and women workforce and the conditions, problems, and expectations of minority groups and women. Conviction of a felony shall not automatically disqualify an applicant. JATA shall make an individual assessment of the applicant's nature of the crime, how long ago it occurred, and any relevant positive characteristics.

The recruitment of persons to fill vacancies will be accomplished without regard to race, color, religion, national origin, sex (including gender identity, sexual orientation, and pregnancy), age, genetic information, disability, veteran status, or other protected class. JATA will maintain contacts with various minority and female focused organizations as well as groups serving people with disabilities and use those groups to help spread the word about job opportunities.

Additionally:

- Whenever practical, job openings will be advertised in the news media. Applications submitted in the past year will be reviewed.
- The latest job listings will be posted in such a manner that all employees and potential employees have equal access to this information.
- Communications will be maintained with educational institutions and vocational schools for recruitment.

## ***Selection***

Individuals will be selected to fill job vacancies through approved procedures following an objective appraisal of each eligible individual interested in the position.

## ***Promotion***

Promotion will be proposed in accordance with applicable rules, on a nondiscriminatory basis. The procedure used in selecting persons for promotion will be evaluated periodically to ensure that they are realistic and relevant. Any employee who feels he or she has not been accorded fair and impractical treatment regarding employment will be offered an opportunity to discuss this problem.

1. Training programs shall be designed to upgrade the skills of employees so that they can improve their performance in their present position.
2. On-the-job training will be designed so that employees have an opportunity to acquire skills needed to qualify for a better position with JATA.

3. Employees with managerial ability will be encouraged to acquire skills on-the-job or through more formalized training prior to the advancement into a management position.

## ***Training***

JATA shall provide training annually to all employees with responsibilities under this policy including the JATA Executive Director, EEO Officer, and Department Heads

## ***Termination and Discharge***

An employee may resign by presenting a written notice of resignation to the employees' supervisor. An employee may be dismissed for unsatisfactory performance of duties, for disciplinary reason, for other just causes under the collective bargaining agreement for reduction in workforce.

## ***Selection Standards & Procedures***

- Selection—in selecting potential employees it shall be the policy to avoid, and eliminate where needed, standards or procedures which tend to screen out minority and female applicants. Selection processes are specifically concerned with preventing selections based on derogatory stereotypical characterizations of individuals based on religion, race, color, national origin, age, sex, height, weight, sexual orientation, or disability.
  - Additional mechanisms such as probationary periods may be used to further examine the suitability of the employee. Probationary periods are clearly defined in employment offer letters, labor contracts, and are applied equally to all employees assigned to positions requiring them.
  - Individuals with handicaps are hired and promoted on merit factors alone and not by arbitrary generalizations, stereotypes, or preconceived notions about handicapped or temporarily disabled individuals.
- Use of EEOC Guidelines—it shall be the policy of JATA to subscribe and comply with the Equal Employment Opportunity Commission's (EEOC) guidelines on employee selection. If testing takes place, tests shall be job related and consistent with the EEOC guidelines on employee selection.
- Application Forms—application forms and pre-employment inquiries shall be conducted in a manner that is neutral and non-discriminatory. Traditional discriminatory barriers—except for bona fide requirements—shall be avoided and corrected when found. JATA provides electronic applications as well as traditional paper application forms.
- Interviews—interviews shall be conducted in an objective manner. It shall be the policy of JATA that the interviewer be qualified and sensitive to the goals and objectives of the Equal Employment Opportunity Policy and Plan.
- Monitoring Process—All steps in the selection process shall be evaluated and monitored by the EEO Officer.

## ***Disciplinary Procedures & Termination Process***

Employees of JATA are required to always conduct themselves in a manner that reflects a positive image for JATA. Staff are expected to perform their duties safely with honesty and integrity. Disciplinary actions (e.g., termination, demotion, discipline, or layoff) will be administered consistently and equitably.

The objective is correcting an employee's deficiencies. The level of discipline is based on the totality of the

circumstances surrounding the issue. Depending on the nature of the infraction or performance deficiency as determined by investigation, the following progressive action may be taken:

- Verbal Warning
- Written Warning
- Suspension Without Pay
- Termination

Layoff guidelines or other clauses in union contracts will be monitored for disparate effects on employees within protected classes. Should any barriers to equal employment be identified, JATA will work to revise any future union agreements within this area.

### ***Compensation & Benefits***

Wages, salary levels, and other forms of compensation shall be consistent with the Equal Pay Act of 1963, as amended, and administered in a non-discriminatory manner. The Equal Pay Act means equal pay for equal work. JATA will review its compensation and benefit structure on an annual basis to ensure protected classes do not fall risk to discrimination. Compensation information is additionally described in the JATA Employee Handbook.

Reviews will also be made to compare job descriptions with actual job functions of positions held by employees of protected classes, comparing length of service and pay rates. All additional benefits, such as retirement plans and medical benefits, will also be reviewed to ensure they are being equally available to all employees.