



Operated By

Transit Management
of Racine, Inc.

Belle Urban System

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Equal Employment Opportunity Policy
Of
Transit Management of Racine, WI
For The
Belle Urban Transit System

March 2014

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Transit Management of Racine Belle Urban System

I. Policy Statement

Equal Employment Opportunity

Transit Management of Racine (TMR), contractors for the operation the Belle Urban System has a policy of providing equal opportunities to all employees.

We recruit, hire, train, promote, compensate, terminate and otherwise treat all individuals without regard to race, sex, religion, color, age, national origin, marital status, veteran status, disability or any other legally protected status, with equal protection.

As required by law, we make reasonable accommodations for all known physical or mental limitations of any applicant or employee. We will recruit, select and place in our workforce, qualified minority group numbers, women, disabled veterans and any other individuals who may have disabilities.

All employees and representatives of the company are expected to act in a respectful manner to our customers, fellow employees and applicants. In addition, we will conduct ourselves in a manner that is consistent with all U.S. Equal Employment Opportunity requirements.

TMR will utilize its best efforts to afford any minority and female business enterprises, the maximum opportunity to participate in the performance of subcontracts pertaining to construction projects that the Transit system engages in.

TMR will evaluate the performance of its management and supervisory personnel on the basis of their involvement in achieving these affirmative action objectives as well as other established criteria. Any employee of the Company or subcontractor of this Company who does not comply with the Equal Employment Opportunity Policies and Procedures as set forth in this statement and plan will be subject to disciplinary action. Any subcontractor not complying with all applicable Equal Employment Opportunity/Affirmative Action laws, directives, and regulations of Federal, State and Local governing bodies or agencies thereof, will be subject to appropriate legal action.

Each and every applicant, including current employees, has the right to file a complaint alleging discrimination with the EEO officer of the Transit System.

TMR will provide various benefits to any and all recipient or sub-recipient contractor who along with Transit Management of Racine fulfills all EEO goals through the enhanced utilization and development of previously underutilized human resources.

TMR has appointed Michelle Sylvester to manage the Equal Employment Opportunity Program. Her responsibilities will include monitoring all equal employment opportunity activities and reporting the effectiveness of this Affirmative Action Program as required by Federal, State, and Local agencies. The General Manager of Transit Management of Racine will receive and review reports on the program from her. If any employee or applicant for employment should believe that he or she has been discriminated against, they should contact:

Michelle Sylvester, H.R. Manager

Transit Management of Racine
1900 Kentucky Street
Racine, WI 53405
Phone: (262) 619-2432

Willie E McDonald Jr.
General Manager
Transit Management of Racine
Belle Urban System

Willie E. McDonald Jr.

II. Equal Employment Opportunity

1. Practices:

It is the policy of TMR to ensure that all employees, applicants and others, are fully aware that TMR is an Equal Opportunity Employer and that it follows a strict, official policy of Equal Employment Opportunity. The following steps illustrate our commitment to this policy and will remain in force:

A. Internal Dissemination

1. Time clocks and bulletin boards: The Affirmative Action Policy will be posted in areas adjacent to time clocks and bulletin boards.
2. Present employees: Each January a copy of the Affirmative Action Program Policy Statement will be mailed to employees.
3. New employees: A full equal employment opportunity briefing will be a part of all new employee's orientation and training programs.
4. Desegregation: All activities will continue to be desegregated.
5. Minorities in advertising: When employees are featured in product or consumer advertising, both minority and non-minority employees will be pictured, whenever possible.

B. External Dissemination

1. Recruiting services: All local recruitment sources will be informed in writing of Transit Management of Racine's Affirmative Action Program Policy stipulating that these sources actively recruit and refer minorities for all positions listed. These sources include:

The Urban League of Racine/Kenosha
718 N. Memorial Drive
Racine, WI 53404

OIC
730 Washington Avenue
Racine, WI 53403

Hispanic Business Professional Assoc.
833 Lombard Avenue
Racine, WI 53402

Gateway Technical College
1001 S. Main Street
Racine, WI 53403

Workforce Development Center
1717 Taylor Avenue
Racine, WI 53403

2. Correspondence: The Equal Employment Opportunity (EEO) clause will be in or attached to all purchase orders, leases, and contracts covered by Executive Order 11246, as amended and implementing regulations.

3. Job Advertisements: The Company will use the tag line "An Equal Opportunity Employer" on all media job advertisement.
4. Vendors and Subcontractors: Written notification of Transit Management of Racine's policy will be sent to all vendors, subcontractors, and suppliers certifying the policy.
5. Minority organizations: The following minority organizations are notified of TMR's policy in writing:

St. Paul Baptist Church 1120 Grand Avenue Racine, WI 53403	Racine County Clubhouse, Inc. 200-17 th Street Racine, WI 53403	Reverend Howard Saints Home Church 1232 Villa Street Racine, WI 53402
Association for Retarded Citizens 818 Sixth Street Racine, WI 53403	Centers for Community Concerns 1501 Villa Street Racine, WI 53403	Urban League of Racine/Kenosha 718 N. Memorial Dr. Racine, WI 53404
Society's Assets 5200 Washington Avenue Racine, WI 53406	NAACP 1325 16 th Street Racine, WI 53403	Cristo Rey Center 800 Wisconsin Ave. Racine, WI 53403
Rev. Elliot Cohen Project New Life 3117 Lathrop Avenue Racine, WI 53405	Community Action Agency 2113 North Wisconsin Street Racine, WI 53402	Developmental Disabilities 800 Center Street Racine, WI 53403
Bray Center, Inc. 924 Center Street Racine, WI 53403	Anita Hardin C/O Faith Christian Fellowship 1200 Racine Street Racine, WI 53403	Alfonso Gardner 5411 Byrd Avenue Racine, WI 53406
Insider News 1661 Douglas Avenue Racine, WI 53404	The Voice 625 17 th Street Racine, WI 53403	Hispanic Business & Professional Assoc. 833 Lombard Avenue Racine, WI 53402

6. Secondary schools and colleges: The following secondary schools and colleges are notified of TMR's policy in writing:

UW- Parkside, Kenosha
Gateway Technical College, Racine and Kenosha
Carthage College, Kenosha

7. Advertising: When employees are pictured in consumer advertising, an attempt will be made to show both minorities and non-minorities.

III. Duties and Responsibilities of Equal Employment Opportunity Officers.

A. Designated EEO Officer

TMR has designated Michelle Sylvester, Human Resource Manager, as EEO/AA Officer. Her responsibilities include, but are not limited to the following:

1. Developing TMR's EEO/AA policy statement and Affirmative Action Plan/Program consistent with the Company's policies and establishing affirmative action goals and objectives.
2. Implementing the Affirmative Action Plan/Program including internal and external dissemination of TMR's EEO/AA policies and plan.
3. Conducting and/or coordinating EEO/AA training and orientation of TMR supervisors, managers, and subcontractors to inform them of their responsibilities pursuant to the Affirmative Action Plan/Program.
4. Ensuring that managers and supervisors understand that it is their responsibility to take action to prevent harassment of protected class employees and applicants for employment.
5. Holding regular discussions with program managers, supervisors, and employees to ensure TMR's equal employment policies are being followed.
6. Ensuring all minorities, women, and disabled employees are provided equal opportunity as it relates to Company sponsored training programs, recreational/social activities, benefit plans, pay and other working conditions without regard to race, sex, color, handicap, etc.
7. Reviewing the qualifications of all employees to ensure that minorities and women are given full opportunities for transfers and promotions.
8. Periodically auditing training programs and hiring and promotion patterns to remove impediments to the attainment goals and objectives.
9. Designing, implementing, and maintaining EEO audits, reporting, and record systems which will measure the effectiveness of a contractor's Affirmative Action Plan/Program. Determining whether or not a contractor's goals and objectives have been attained and making available appropriate enforcement agencies.
10. Maintaining, monitoring, and measuring TMR's progress toward meeting its affirmative action goals.
11. Identifying problem areas and recommending solutions to the problems.
12. Coordinating the implementation of necessary remedial actions to meet compliance requirements and goals.
13. Serving as liaison between TMR and relevant or applicable governmental enforcement agencies.
14. Serving as liaison between protected class groups and TMR.
15. Coordinating recruitment and employment of women, minorities, and disabled persons.
16. Coordinating recruitment and utilization of women, minorities, and disabled-owned businesses.
17. Receiving, investigating, and attempting to resolve all EEO complaints.
18. Keeping management informed of the latest developments in the area of EEO.
19. Monitoring subcontractors and work sites to ensure compliance in areas such as:
 - a. Proper employment of women and minority employees
 - b. Proper posting of EEO posters
 - c. Female and minority employee's working conditions are free of harassment and intimidation

B. EEO Counselor

It is the responsibility of the EEO Counselor to investigate and to resolve all complaints concerning equal employment opportunity/affirmative action issues. This responsibility shall be assigned to TMR's Operations Manager, who shall report on these matters to the EEO/AA Officer. The EEO Counselor shall keep the EEO/AA Officer apprised of all complaints and all actions to resolve complaints.

IV. Employment Policies and Practice

A. Recruiting

TMR will provide employment opportunities to qualified applicants regardless of race, color, religion, sex, national origin, age, disability, or military status.

To this end, TMR employs the following techniques:

- TMR seeks active involvement with various organizations that are prepared to refer the kinds of applicants desired.
- TMR encourages all employees to participate in workshops and seminars designed for career and self development.
- TMR encourages all employees to continue to be a recruiting source by referring qualified minority, female, and disabled candidates.

B. Selection and Hiring Policy and Practices

It is TMR policy that anyone interested in employment may submit an application for employment in response to an advertised position. The company and its managers will give proper consideration to such factors as education, experience, skills, advancement potential and character. All aspects of the selection process will be administered without regard to race, color, religion, sex, national origin, age, disability, or military status. Candidates for employment must possess the basic qualifications required to effectively perform the functions of the position.

- Applications will be accepted in response to the placement of ads in local newspapers including minority publications (if available). They are valid for one year.
- All applications will be accepted by the administration department and prescreened. Once prescreened, all applications will be reviewed by the respective department head. Those applicants selected for testing will be ranked and interviewed by the department head. Testing will be conducted depending upon the position to be filled. Following testing, interviews and completion of other requirements for the job, the highest ranking individual maybe interviewed by the General Manager or designee. Upon agreement between the General Manager or designee and department head, a background check, drug test, and physical will be performed prior to a job offer being made by the respective department head.
- A formal training program of at least two weeks' duration will be held for new B.U.S. operators. Mechanic training is performed on a one-on-one basis with an experienced mechanic during the probationary period. Administrative staff will be training according to their job duties.
- Operator candidates must satisfactorily meet the following basic requirements to be selected for employment:
 - Possess a valid Commercial Driver's License (CDL) with proper classification or obtain same by the end of the training program
 - No felony convictions and verification of criminal background check for the past 7 years
 - No convictions for driving under the influence (DUI) of vehicular homicide or manslaughter
 - No operator's license suspensions in the past five years
 - Pass pre-employment DOT physical including a drug screen
 - Complete an employment application
 - Complete on-board training
 - Acquire Bureau of Motor Vehicle confirmation of a good driving record and have a valid operator's license
 - Pass standard DOT physical exam (administered at TM of R expense)

In accordance with Equal Employment Opportunity Commission guidelines, an applicant log will be maintained showing each applicant's race or national origin and sex, based upon visual observation; he/she may not ask such questions specifically. When applications are not made in person and applicants are not personally known to the manager, he/she may ask each applicant to fill out a self-identification form and advise the applicant that the information is not being sought for employment decisions but to meet Federal record keeping requirements. Any applicant logs or self-identification forms must be kept in completely separate files and must have no bearing on any employment decision. Applicants will be informed of this fact. The role of the EEO/AA Officer shall be to monitor the hiring and selection procedure in such a way that all applicants are given an equal opportunity for employment. In doing so,

- The EEO/AA Officer will have access to files of all applicants interested in employment.
- Resumes of all applicants will be reviewed periodically by the EEO/AA Officer.
- The EEO/AA Officer will review and suggest revisions on all employment procedures to assure that they do not have discriminating effects and that they help attain goals.

C. Transfer and Promotion Policy and Practices

It is TMR's policy to afford current employees the opportunity for transfers and advancements without regard to race, color, religion, sex, national origin, age, disability, or military status.

TMR makes every effort to promote from within and provide employees with transfer opportunities that qualify them for future promotional opportunities. It is the responsibility of management to provide developmental assistance by which minority and female employees can advance within the company.

It is TMR policy and practice to conduct individual performance appraisals after the first few months of employment. Administration and supervisory employees are then reviewed annually coinciding with anticipated salary increases, on or about July 1. Union employees are made aware of job openings via postings. Promotion and transfer opportunities are based on performance.

Promotions from one bargaining unit position to another are selected from those persons who apply from the job posting bulletins. Individuals within the respective department as well as all other employees are eligible to sign job postings. Selection is determined by work performance, expected potential and qualifications for the new position.

Promotions within management are based upon qualifications and potential to handle added responsibilities. The General Manager position is filled through a professional services contract between the City of Racine and TMR.

D. Training and Educational Opportunity Policy and Practices

TMR provides educational and training opportunities to its employees regardless of race, color, religion, sex, national origin, age, disability or military status.

TMR conducts initial orientation sessions with new employees.

It is the responsibility of all department heads to identify, encourage and implement training opportunities for all personnel. This is to be done with the primary goal of increasing the total organizational strength and effectiveness.

The training process could include but is not limited to:

1. One-on one training between management and staff.
2. Local training courses, seminars, community colleges, trade schools, etc.
3. Local, regional and national training courses.

E. Termination and Discharge Policy and Practices

An employee may resign by presenting a written notice of resignation to the employee's supervisor.

An employee may be dismissed for unsatisfactory performance of duties, disciplinary reasons, for reduction in workforce and other just causes.

Employees may be paid upon termination for accumulated vacation and sick leave on a pro-rata basis. Medical and life insurance will be paid through the effective date of termination of the employee.

Appeal Procedures

Any TMR employee who feels that he or she has been unjustly treated or discriminated against has the right to appeal both verbally and in writing, to his or her immediate supervisor. However, TMR

recognizes that using the chain of command is not always appropriate or desirable, so employees may make a complaint to any other Supervisor or the General Manager. The complaint should be as specific as possible in describing the alleged discrimination, giving detailed description of the incident, specifying who was involved, when the incident occurred and providing any other information that may be relevant to the case. The employee's immediate supervisor is therefore required to respond to the appeal within five (5) days after receipt.

If the situation is not resolved at the immediate supervisor's level, the employee has the right to submit a written notice of appeal to the EEO Counselor. The EEO Counselor must respond to the employee's appeal within five (5) working days.

Any union TMR employee who feels that he or she has been unjustly treated has the right to appeal the employment termination decision under the appropriate sections, terms and conditions of the bargaining agreement.

The EEO/AA Officer will be apprised of all verbal and written appeals.

F. Seniority

Teamsters Local 43 represents employees of the transportation and maintenance departments as certified by the U.S. Department of Labor. Seniority practices affecting these employees are agreed to in the labor contract.

G. Wages and Salaries

TMR complies with the Equal Pay Act of 1963 which requires all employers subject to the Fair Labor Standards Act to provide equal pay for men and women performing similar work.

H. Employees with Disabilities

It is the policy of TMR not to discriminate against any employee or applicant for employment because of physical or mental disability in regard to any position for which the employee or applicant for employment is qualified. TMR takes affirmative action to employ, advance in employment and otherwise treat qualified individuals with disabilities, without discrimination based upon their physical or mental disability in all employment practices. TMR provides reasonable accommodations for employees with disabilities.

I. Sexual Harassment Policy and Practices

TMR will not tolerate sexual harassment of its employees by anyone to include supervisors, other employees or clients. Persons harassing others will be dealt with swiftly and vigorously.

Normal, courteous, mutually respectful, pleasant, non-coercive interactions between employees that are acceptable to both parties are not considered to be sexual harassment.

Sexual harassment as defined by the Equal Employment Opportunity Commission is:

- Unwelcome or unwanted sexual advances;
- Requests and demands for sexual favors;
- Verbal abuse or kidding that is sexually oriented and considered unacceptable by another individual;
- Engaging in any type of sexually oriented conduct that would unreasonably interfere with another's work performance; and
- Creating a work environment that is intimidating, hostile, or offensive.

This policy is to protect all employees. If it is proven that an employee has knowingly and intentionally falsely accused another employee of sexual harassment, it will be considered that such employee is guilty of making false accusations and will be appropriately disciplined.

It shall be the responsibility of the EEO/AA Officer to advise any employee who feels she or he has been sexually harassed of the proper procedure for handling the complaint.

J. Affirmative Action Complaint Policy

It is the policy of TMR to provide a pleasant working environment for all employees. The complaint procedure outlined below will address discrimination complaints regarding race, color, religion, sex, national origin, age, disability, or military status.

Utilization of this complaint procedure will not in any way jeopardize current or prospective employment status.

Procedures are as follows:

- EEOC guidelines require the filing of discrimination claims within 300 days of the alleged discriminatory act. TMR also requires the same 300 day (filing/notification) requirement. Extending the time frame beyond the 300 day period makes investigating and resolving alleged cases of discrimination exceedingly difficult and financially burdensome. Provided, however, in appropriate circumstances, the 300 day requirement may be waived. In determining appropriate circumstances TMR will defer to federal and state cases.
- All discrimination complaints filed under this procedure will be accepted for investigation.
- Employees will be advised and counseled as to other avenues of redress including, but not limited to the following:
 - Wisconsin Human Relations Commission
 - Equal Employment Opportunity Commission
- The complainant will receive written notification regarding the results of the investigation and the final disposition of the complaint, including remedial actions to be taken.

K. Confidentiality

TMR will treat all information received in connection with any filing, investigation, resolution, and inquires of as highly sensitive. All persons involved in any proceedings shall maintain confidentiality to the fullest extent possible. Information gathered is not to be shared with anyone other than those persons deemed necessary and on a need to know basis. All records placed in personnel files are protected by the provisions of Wisconsin General Statutes. TMR, however, cannot guarantee complete confidentiality given the nature of the process need to assure a fair and thorough investigation. Examples of situations in which the TMR may not be able to maintain complete confidentiality include but are not limited to:

- Where TMR is required to disclose information, such as in response to a legal process;
- Where and when the law requires disclosure;
- Where disclosure of information appears necessary to conduct a thorough investigation of the complain; or
- Where confidentiality concerns are outweighed by the greater good of the TMR (i.e. interest in protecting the safety of others or where the interest of the public's right to know outweighs an individual's right of confidentiality).

L. Protection from Retaliation

TMR is dedicated to creating an environment that is free from discrimination. Employees and applicants are encouraged to come forward with complaints when they believe that their right to equal employment has been violated under the provisions of this Policy with fear of retaliation.

V. Utilization Analysis

Equal employment opportunity assumes that the workforce of any given business concern should mirror the race and sex composition of the population. A major factor in assessing equal employment opportunity is the skill availability of the labor pool. Equal Employment Opportunity legislation (Title VII of the Civil Rights Act of 1964, as amended) and subsequent executive orders (Executive Order 11246, as amended); require that Federal contractors and subcontractors certify that they do not

discriminate with respect to employment and the conditions thereof. Furthermore, business concerns contracting with the Federal government must take affirmative action to achieve and insure equal employment opportunity.

The assessment below views the total TMR workforce, provides a job classification breakdown according to minorities and non-minority females and the availability of minorities and non-minority females in the Metropolitan Statistical Area (MSA).

A. TMR Workforce

The TMR workforce consists of approximately 90 employees representing four (4) occupational groups: Management/Supervisory/Professional, Office/Clerical/Dispatch, B.U.S. operators, and Mechanics/Helpers. It is the policy of TMR to promote from within. The General Manager, the top management position, is provided through a professional services contract between the City of Racine and TMR.

B. Area Labor Market (Based on the 2010 US Census)

1. Employment Data

Area coverage: Racine and Racine County, Wisconsin – The recruitment of professional and managerial positions for local jobs is carried on in this area with little need to resort to other recruitment. On occasion, an out-of-area recruitment has been done to meet a specific need. With the area experiencing a declining job market over the last several years, there has been little need to go out of the immediate area to recruit workers for positions.

2. Population Data

For Racine, 51.2% of the total population is female, and minorities account for 46.5% of the population. Black Americans are the dominant minority group involving 22.6% of the population; Hispanics constitute 20.7%. Racine's unemployment rate approached 13% in 2011.

3. Minority and Female Data (most recent available data)

The rate of unemployment of both sexes is 12.2% for all minorities, which is three times the jobless for the labor force as a whole. The unemployment rate for minority women is 15.9% compared to 4.3% unemployment rate for all women.

In the transportation and material moving occupations, the rate of employment for minorities is 15%, significantly less than that of white workers, which is 86%. The 90% of white workers employed in clerical jobs is significantly higher than the 11% figure for minorities.

A significantly lower proportion of minorities, 7%, are employed in professional, teaching and related jobs as compared to 94% of white workers. Service workers command a larger percentage of the minority working population, 24%, but still significantly less than the 77% for the white working population.

Nearly 78% of white females are employed in administrative support and clerical jobs. In the service occupations, the employment of female's ratio equals 66% of the working total.

4. Managers, Supervisors, Professionals

At present, (as of March 2014), this category contains Five (5) people including two (2) females, one (1) African-American male, one (1) Hispanic male, and one (1) white male.

Goal: From 2014 to 2016, every effort will be made to maintain this diversity.

5. Office, Clerical and Dispatch

The employees in this category currently number four (4) and exhibit a traditionally low turnover rate. Female utilization is high. There is one (1) white female, two (2) black females, and one (1) black male,

Goal: From 2014 to 2016, every effort will be made to maintain or improve this diversity.

6. Operators

With seventy-four (71) operators, this category represents approximately 78% of Transit Management of Racine's, total number of employees, making it the largest category in the organization. Since minimal education and experience are required and there is periodic turnover, this category will continue to receive the main thrust of recruitment.

Diversity in this category is strong with a majority of positions being held by minorities.

Since 2010, TMR received approximately 2075 applications and resumes for employment in the bus operator category. Of the applications, records show that 29% of these applicants were female and 61% were minorities. Minority utilization is high and a continued faithful effort will be put forth in upcoming recruitments. TMR has encouraged minority application by informing minority groups if possible upcoming openings, providing information on job classifications at TMR, informing minority organizations that TMR accepts applications on an ongoing basis, participation in job fairs, job announcements in minority targeted publications, and providing information as to when and where to file applications for employment at TMR.

Goal: from 2014 to 2016, we will make every effort to maintain or improve this diversity.

7. Mechanics and Helpers (Crafts/Laborers)

Out of the ten (10) mechanics and helpers there is (1) white female and two (2) minorities. The female is not a mechanic but is employed as a cleaner. She has the option to apply for any opening in the mechanical ranks (subject to qualification requirements being met); however, to date she has not chosen to apply for a mechanic job. In general, very few applications from females and/ or minorities are received in this category.

Goal: Past efforts in this category for the employment of females and minorities have met with little success.

C. System Goals

TMR will maintain adequate records, to assure that affirmative action's goals are met. The following will illustrate methods for this goal:

1. Application records: TMR will maintain and update application records. These records will contain the names of persons making application for employment, their sex, race, disability status, application date, and referral source.
2. Hiring Records: TMR will maintain records of all newly hired employees. These records will include the name, sex, race, disability status, job title, date, pay rate, and referral source of all new hires.
3. Promotion Records: TMR will maintain records of all promotions. These records will include the name, sex, race, disability status, job title, date, pay rate, and referral source of all persons promoted.

4. Transfer Records: TMR will maintain records of all transfer records. These records will include the name, sex, race, disability status, job title, date of action, and action taken.
5. Disciplinary Records: TMR will maintain records of all disciplinary actions. These records will include the name, sex, race, disability status, job title, date of action, and action taken.
6. Termination Records: TMR will maintain records of all terminations. These records will include the name, sex, race, disability status, job title, date of termination, pay rate, and reason for termination of employment.
7. Management of the Internal Reporting System: The EEO Officer will be responsible for the monitoring of each record category and will monitor all applicant, new hires, promotions, and terminations to determine if Affirmative Action Program goals are being met.
8. Semiannual Reporting: The EEO Officer will be responsible for fulfilling the reporting requirements as deemed necessary by the State of Wisconsin, Department of Workforce Development, and all other governmental agencies requiring reports. Information from the internal audits and monitoring systems will be used to file these reports with the appropriate governmental agencies in a timely manner.
9. Annual Reporting: The EEO Officer will report program effectiveness, goals and timetables for achievement in correcting underutilization, and current status of employment representation.
10. Quarterly Reporting: The EEO Officer will discuss with the General Manager the status of the Affirmative Action Program and projected goals to correct underutilization.

C₂. Discrimination Guidelines on Religion or National Origin

1. TMR will not discriminate against any employees or applicants for employment because of religion or national origin and will take affirmative action to ensure applicants are employed and that employees are treated during their employment without regard to religion or national origin. Such action includes, but is not limited to, the following: employment, promotion, demotions, transfers, recruiting, advertisement, layoffs, terminations, rate of pay, and selection for training.
2. The Company's internal communication regarding discrimination towards minorities and females shall be expanded to include matters pertaining to religion and national origin. Internal procedures will be developed to ensure the Company's obligation to provide equal employment opportunity without regard to religion or national origin. Recruiting sources, such as employment agencies, college placement, and business associates, will be encouraged to refer employees in accordance with this policy. The Company will attempt to make reasonable and practical accommodations for the religious observances and practices of employees who regularly observe Friday evening and Saturday or some other day of the week as their Sabbath and/or certain religious holidays during the year, and who are conscientiously opposed to performing work or engaging in similar activities on such days, providing such accommodations can be made without hardship to the Company and other employees and are permissible under Federal and State Laws enforced by our courts.

D. Identification and Assessment of Positions

1. Identification

There are four categories of positions within the Company:

- a) Manager/Supervisor/Professional. We are very proud of our diversity in this classification..
- b) Office/Clerical/Dispatch – Female utilization in this category is high. The turnover rate in this category is very low.
- c) Bus Operators - Minority and female representation is strong and we will make every effort to maintain or improve diversity.
- d) Mechanics/Helpers - This category is more heavily weighted toward white males and we will make every effort to improve diversity.

2. Application Forms and Job Descriptions

- a) Application Process – Applications are accepted by the Company Monday through Friday from 8:00 AM to 4:00 PM on an on-going basis to promote the best possible recruitment. A notice is posted on the business office door informing the public of this information. Application forms are not allowed to be taken off the property and must be personally filled out by the applicant. In addition, all local recruiting sources and minority organizations are informed of the above information in an attempt to assure that applicants are not inhibited by external factors from applying for positions with the Company and to seek their assistance in helping to recruit qualified members of minority group.

The structure of the Company's application form is designed to provide data on skills and qualifications of the applicant, educational background, military training records, past employment history, and to supply personal references. The application is in compliance with ADA requirements as well. In addition, the job application form contains a "Release of Information from Past Employers: which is signed by the applicant. Resumes and letters of introduction are accepted at any time and are acknowledged by the Company with a letter informing the applicant that resumes are kept on file for a period of one (1) year.

- b) Application Records – Applicant records have been collected at time of application for employment for several years. Data records for 2010 indicate that approximately twenty-three (298) applications and resumes for employment were received. Of these applications and resumes for employment, the vast majority were from black males and black females looking for employment as bus operators. Of all applications received, 41% were female applicants, 38% were black, and 24% were Hispanic, Native American, or Asian American. Total applications from minority groups represent 64% of all applications received.
- c) Recruitment and Selection – TM of R's recruitment and selection process for hiring: employees are formalized and include forms, interview techniques, and the final selection process. The Company's application form was developed internally with a focus on preventing any type of discrimination. These, plus new interviewing techniques, are continuously reviewed and updated.
1. The Company utilizes a recruitment and selection process for hiring mass transit operators which includes the following: an application form, performance checks with past employers, reference checks, personal interviews, motor vehicle license checks, a comprehensive physical examination, criminal background check and alcohol/drug screening.
 2. Applicants to be given consideration for possible employment are screened by qualifications, skills, and past experience listed on their employment application and by information obtained from past employers regarding their work performance.
 3. After screening of applicants, interviews for the selection of transit operators are conducted by the Operations Manager and Director of Human Resources. At least one interview of approximately 45 minutes is conducted. The interview is a structured questionnaire and discussion to obtain further information and clarification as to the applicant's skills, qualifications, time is spent during the interview explaining the job of mass transit operator so that the applicant can best relate their answers to questions and also help the applicant affirm their desire to be a mass transit operator. Applicants are also requested to bring their motor vehicle license status reports when reporting for the interview. Applicants with serious violations or convictions which would be related to a bus operator's job responsibilities are screened.

3. Assessment and Analysis of Seniority Practices and Provisions

- a) All employees are covered under a contract between the Company and the Teamsters Local Union No. 43. Under the terms of this contract, seniority rights prevail and are used to determine job picks, layoff, and recalls.

4. Promotion and Transfer Procedures

- a) No definitive policy exists with regard to promotion. Among both union and salaried personnel, performance and experience are the overriding considerations. When these factors are near equal, top management will actively affirm its commitment to promote females and minorities. In practice, these have worked as anti-discriminatory factors except to the degree that the present work force from which promotions are made does not contain sufficient or qualified females.
- b) Written transfer requests are required from an employee. Granting a request depends upon the availability of a job position, commensurate skills, and qualifications of the applicant.

5. Formal and Informal Training Programs

- a) All new operators undergo an extensive training program, which lasts approximately three (3) weeks. During the three-week program, about ten (10) days are spent on route practice with various experienced operators. No racial or sex bias exists in this training program.
- b) The only program that approaches an apprenticeship program in the Company is the progression of positions through which the new mechanics typically pass. They often begin as Cleaners/Helpers and progress through the ranks of the Maintenance Department as personnel are needed. They pass through in order of seniority subject to performance qualifications being met. If there are no internal applications then we recruit from the outside. It is not a formal apprenticeship program and to view it as such would be misleading. If no qualified applicants are found, external recruitment efforts are utilized.
- c) Job-related self improvement in an employee's spare time is encouraged by the Company. Workshop and Seminar training attendance is encouraged and in-house training is periodically required for employees.

6. Wage Administration and Benefits Program

- a) The Management Company adheres to a documented Wage Administration Program which includes a listing of each job position and its responsibility category to the organization and a wage range. A full range of benefits is provided to all full-time Management employees of TM of Racine.
- b) For bargaining unit employees, wage administration and benefits are administered under the provisions of the contract agreement between the Company and the Union.

7. Disciplinary Procedures/Discharge and Termination Practices

- a) The Company actively follows a progressive disciplinary and termination procedure as defined in the Collective Bargaining Agreement with Teamsters Local 43.

Appendix:

A. Job Descriptions

1. EEO/AA Officer

General Description

Reporting directly to the General Manager, the Equal Employment Opportunity/Affirmative Action (EEO/AA) Officer is assigned the following duties and responsibilities:

Duties

- Assists in the identification of areas in need of improvement and establishes objectives and goals to implement Affirmative Action (AA) policies.
- Attends related meetings and seminars.
- Participates by active involvement with minority organizations and community action groups.
- Audits hiring and promotion patterns.
- Periodically reviews qualifications of employees to assure that full opportunities for transfers and promotions are given to all minorities and women.
- Meets with new employees to inform them of TMR's Affirmative Action Program.

- Ensures that posters are properly displayed in conspicuous and accessible locations and EEO/AA information is adequately disseminated throughout the organization.
- Counsels all employees regarding career development and promotions.

Responsibilities

- Develops policy statement, AA programs, and internal and external communication techniques.
- Assists in the identification of EEO/AA problem areas.
- Assists corporate management in arriving at solutions to EEO/AA problems.
- Designs and implements audit and reporting systems that will measure the effectiveness of TM of R's AA program, indicate need for remedial action, and determine the degree to which the goals and objectives are progressing.
- Periodically reviews hiring and promotion patterns to ensure objectives are met.
- Serves as liaison between minority organizations and community action groups.
- Keeps management informed of latest developments in the entire EEO/AA area.
- Gives assistance to all management in the establishment of appropriate goals and timetables.
- Discusses the program regularly with management personnel.
- Ensures that minority and women employees are afforded a full opportunity and are encouraged to participate in all company sponsored educational, training, recreational, and social activities.

2. EEO Counselor

General Description

The EEO Counselor shall coordinate directly with the EEO/AA Officer but shall not be under the direction of the EEO/AA Officer in matters concerning the investigation and resolution of EEO/AA complaints. The EEO Counselor is assigned the following duties and responsibilities:

Duties

- Assists in the identification of areas in need of improvement and helps to establish objectives and goals to implement EEO/AA policies.
- Assists in auditing hiring and promotion patterns.
- Receives and investigates complaints concerning EEO/AA matters.
- Works with the complainant and others as necessary to resolve any complaint.
- When required, works with Corporate Counsel, other attorneys and appropriate agencies to resolve any complaint.
- Performs other duties as assigned.

Responsibilities

- Assists in the identification of EEO/AA problem areas.
- Assists corporate management in arriving at solutions to EEO/AA problem areas.
- Keeps the EEO/AA Officer and management informed of the latest developments in the entire EEO/AA area.
- Assists the EEO/AA Officer in the establishment of appropriate goals and timetables.
- Discusses complaints and possible solutions with supervisors and management personnel as necessary.
- Fulfills all necessary investigations and responsibilities connected with grievances that are filed with regard to the EEO/AA Program.

3. Recruitment Sources

Establishment of Job Qualifications – Staff will monitor job descriptions, including minimum experience and training requirements, and any written or oral tests used in screening, in order to detect selection devices that: (a) treat a person that is a member of a protected class applying for the same job differently (i.e., disparate treatment); and/or (b) have a disparate impact, which is not job related, on the basis of a person's membership in a protected class.

Cultivate Recruitment Sources for Minorities and Women – Staff will identify, develop, and maintain relationships with schools, associations, agencies, and other organizations that have the potential to refer members of protected groups as applicants.

Cultivate Recruitment Sources for Persons with Disabilities – In order to increase the applicant pool of persons with disabilities, staff will establish a relationship with the Racine offices of the Division of Vocational Rehabilitation and the Division of Services for the Blind, as well as other organizations that work with persons with disabilities.

High School, Technical School, and College/University Recruitment – Staff through contacts with educational organizations, will continue to develop relationships with appropriate institutions consistent with the employment needs of TMA, including recruiting underutilized groups.

Publicity and Awareness – Staff will continue to identify new advertising venues and promotional opportunities, such as publications whose target audience includes minorities and women.

Appendix A:

Application for Employment submitted as an attachment



Operated By

Belle Urban System

1900 Kentucky St., Racine, WI 53405
Ph: 262-619-2438 www.racinetransit.com



Title VI Statement

Transit Management of Racine, operates its programs without regard to race, color, sex or national origin. Copies of documents related to Title VI, Equal Employment Opportunity, Affirmative Action and Americans with Disabilities Act, are available on request from the office listed below. Any member of the public, who wishes to file a discrimination complaint against the Belle Urban System, should follow the procedure outlined below.

COMPLAINT PROCEDURES

Title VI Discrimination Equal Employment Opportunity (EEO) Americans with Disabilities Act (ADA)

Transit Management of Racine has incorporated appropriate due process standards that provide for the prompt and equitable resolution of complaints alleging any action prohibited by federal, state, or local law or regulations, including, but not limited to, matters related to discrimination, Title VI, Equal Employment Opportunity, and the Americans with Disabilities Act. Resolution of complaints will be handled in the following manner:

1. A complaint may be submitted in writing, by telephone, or in person with a description of the incident to the office of the General Manager at the office or telephone number listed below. The General Manager shall, after investigation, respond to the complainant within thirty days of receiving the complaint.
2. If the complainant is not satisfied with the General Manager's resolution of the issue, the complainant may then appeal the decision to the City of Racine Transit & Parking Commission. The Commission will schedule a hearing at a mutually convenient time with the complainant to consider the issue. If the resolution of the issue by the Commission is not satisfactory to the complainant, an appeal may be made to the U.S. Department of Transportation, Federal Transit Administration.
3. The responsible employee to coordinate efforts to comply with this policy is:

Willie E McDonald Jr.
General Manager
Belle Urban Syst

BELLE URBAN SYSTEM

Title VI Policy

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that “no person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” (42 U.S.C. Section 2000d)

Individuals or organizations who believe they have been denied the benefits of, excluded from participation in, or subject to discrimination on the grounds of race, color or national origin by a recipient of Federal Transit Administration funding can file an administrative complaint with the Belle Urban System. Information on how to file a Title VI complaint can be obtained by contacting:

**The Belle Urban System
EEO Officer at
1900 Kentucky St.
Racine, Wisconsin 53405**