

Title VII (EEO) Program Checklist

Pursuant to Title VI of Civil Rights Act of 1964 (42 USC 2000e); Equal Pay Act of 1963, 29 U.S.C. 201; Age Discrimination in Employment Act of 1967, 29 U.S.C. 6331; Title IX of the Education Amendments of 1972, Public Law 92-318; Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. 794; Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d; 28 CFR Part 42, Subpart F, "Coordination of Enforcement of Nondiscrimination in Federally Assisted Programs"; 29 CFR Part 1605, "Guidelines on Discrimination Because of Religion"; 29 CFR Part 1605; 29 CFR Part 1606, "Guidelines on Discrimination Because of National Origin"; 29 CFR Part 1607, "Uniform Guidelines on Employee Selection Procedures"; and UMTA C 4704.1 "Equal Employment Opportunity Program Guidelines for Grant Recipients" dated July 26, 1988.

Recipient Name:	
Recipient Vendor/TrAMS ID:	
Date EEO Program was received:	
EEO Program initial review date:	
EEO Program final review date:	
Review conducted by:	
Date Letter of Approval issued:	
Date TrAMS data entered:	

TITLE VII (EEO) PROGRAM - FTA Threshold Requirements: Employs 50 or more transit-related employees; **and** request or receives capital or operating assistance in excess of \$1 million **or** requests or receives planning assistance in excess of \$250,000. All subreipients or contractors who meet the threshold are required to submit a program to the FTA recipient. The recipient or sub recipient shall monitor the contractor's EEO program plan to ensure compliance and affirmative action efforts are met.

Recipient programs shall be submitted to the FTA Regional Civil Rights Officer (RCRO) every three years or whenever significant changes have occurred in their organization. State DOTs are required to submit annual update reports to the U. S. Federal Highway (Highway) in their respective districts or regions. The Highway EEO Specialist would provide a copy of the state DOT's report to the FTA RCRO for review and comments and coordination. The Highway Civil Rights Office will review and approve the state DOT's EEO program report and will issue a Letter of Approval to the state DOT with a copy to the FTA RCRO.

Chapter/Section	Status	Description	Corrective Action
OVERALL EEO PROGRAM			
The required EEO Program Components are described in Chapter III, Section 2, Program Requirements.			

Chapter/Section	Status	Description	Corrective Action
STATEMENT OF POLICY - 2a			
a. Is there a written statement issued by the chief executive officer regarding EEO policy affecting employment practices, including recruitment, selection, promotions, terminations, transfers, layoffs, compensation, training, benefits, and other terms and conditions of employment?			
Does the statement include:			
(1) the recipient/subrecipient /contractor's commitment to EEO for all persons, regardless of race, color, national origin, sex, creed, or age. At its discretion, it may include handicap.			
(2) a commitment to have an affirmative action program, including goals and timetables?			
(3) a statement that the responsibility for the implementation of the EEO program is assigned to an agency executive?			
(4) a statement that all management personnel must share in this responsibility to assure compliance?			

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(5) a statement that applicants and employees have a right to file discrimination complaints?			
(6) a statement that managers, supervisors, etc. will be evaluated on the program success as their performance of other agency's goals?			
(7) a statement that achievement of EEO goals will benefit recipient/subrecipient/contractor through fuller utilization and development of previously underutilized human resources?			
Are there other written policies, i.e., sexual harrassment, ADA. These are nto required for the circular, but as part of a EEO compliance review, they do ask to review their ADA policy.			

Chapter/Section	Status	Description	Corrective Action
DISSEMINATION - 2b			
Are there internal and external formal communication mechanisms to publicize and disseminate the recipient's EEO policy?			
(1) Internally , are managers and supervisors fully informed of the agency's policy by actions such as:			
a) written communication from the CEO/GM			
b) Inclusion of the EEO Program in personnel and operations manuals			
c) Meetings held at least semiannually to discuss the program and its implementation?			
Internally , is non-supervisory staff informed by actions such as (d):			
<u>1</u> Posting of EEO posters and policy statements in conspicuous and accessible locations			
<u>2</u> Including EEO policy in employee handbooks, reports, manuals and union contracts,			
<u>3</u> meeting with minorities, and females for program suggestions			

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4 Presentation of EEO program as part of employee orientation and in all training programs.			
(2) Externally , is the EEO policy and programs disseminated to regular			
a) employment agencies, hiring halls, unions, educational institutions, minority, persons with disabilities groups, and women’s organizations, civil rights organizations, community action groups, training organization and others who refer applicants.			
b) public media sources, radio, television stations, newspapers, magazines and other journals (oriented to the handicapped and minority populations)			
c) does the advertisement and vacancy announcements state the recipient is an Equal Employment Opportunity Employer?			

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DESIGNATION OF PERSONNEL - 2c			
• Does the manager/director of EEO report directly to the agency's CEO/GM?			
• Are the specific responsibilities of EEO personnel listed? They should include the following, at a minimum:			
(1) Developing and recommending EEO policy, a written EEO program, and internal and external communication procedures;			
(2) Assisting management in collecting and analyzing employment data, identifying problem areas, setting goals and timetables, and developing programs to achieve goals;			
(3) Designing, implementing, and monitoring internal audit and reporting systems to measure program effectiveness and to determine where progress has been made and where further action is needed;			
(4) Reporting periodically to the CEO on progress of each unit in relation to the agency's goals;			

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(5) Serving as a liaison between the agency, Federal, State, and local governments, regulatory agencies, minority, handicapped and women's organizations, and other community groups;			
(6) Assuring that current legal information affecting affirmative action is disseminated to responsible officials;			
(7) Assisting in recruiting minority, handicapped and women applicants and establishing outreach sources for use by hiring officials;			
(8) Concurring in all hires and promotions; and			
(9) Processing employment discrimination complaints.			
Managers are expected to carry out the following responsibilities, as part of their job, in implementing the agency's EEO Program:			
(1) Assist in identifying problem areas and establishing agency and unit goals and objectives;			

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(2) Being actively involved with local minority organizations, women's and disabled groups, community action organizations and community service programs designed to promote EEO:			
(3) 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;			
(4) Holding regular discussions with other managers, supervisors, and employees to assure the agency's policies and procedures are being followed;			
(5) Reviewing the qualifications of all employees to assure that minorities, people with disabilities, and women are given full opportunities for transfers, promotions, training, salary increases, and other forms of compensation;			
(6) Participating in the review and/or investigation of complaints alleging discrimination;			
(7) Conducting and supporting career counseling for all employees; and			

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(8) Participating in periodic audits to ensure that each agency unit is in compliance (e.g. EEO posters are properly displayed on all employee bulletin boards).			

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UTILIZATION ANALYSES			
Does the work force analysis include a statistical breakdown of the recipients' workforce by each department job category and job title?			
Is the aforementioned cross-referenced by race and sex?			
Is the current percent of employees for each category cross referenced by group?			
Is there an availability percentage identified for each category cross referenced by group?			
Is the percentage of underutilization for each category cross referenced by group?			
Are there numbers for anticipated openings for each category cross referenced by group? It can be either by attrition or expansion.			
Are there numbers for jobs that will be filled by recruitment, transfers, promotions and new hires for each category cross referenced by group?			

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GOALS AND TIMETABLES			
<p>Are there specific and detailed percentage and numerical goals with timetables set to correct any underutilization of specific affected classes of persons identified in the utilization analysis? There should be long term (in percentages) and short term (numbers and percentages)</p>			

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EMPLOYMENT PRACTICES			
Is there a detailed narrative assessment of present employment practices to identify those practices that operate as employment barriers and unjustifiably contribute to underutilization?			
The detailed narrative should include procedures for: recruitment and employment selection, position descriptions, recruitment methods, interview procedures, test administered, seniority practices, promotional procedures, transfer procedrues, training programs; procedures regarding wage and salary levels and other other benfits; a narrative of disciplinary procedrues and discharge and termination practices.			
Are problem areas identified and a plan of action proposed?			

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Do the analyses contain statistical data to document the impact of the employment practices by race and sex?			
Does this analysis contain:			
The number of individuals by race and sex apply for employment within the past year?			
The number by race and sex of those who were actually hired?			
The number of employees in each job category by race and sex who have applied for promotion or transfer within the past year and those who were promoted.			
The number and types of disciplinary actions and terminations by race and sex.			

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MONITORING AND REPORTING SYSTEMS			
Is there a system for reporting, monitoring and evaluating improvement in hiring, training, transfer and promotions in areas of under participation?			
Does it discuss periodic reports collected from supervisory personnel?			
Does it discuss how upper echelon management are informed of progress and problems and solicitation of recommendations. Are there meetings and how often?			
Does it contain mechanisms for tracking disciplinary actions, i.e. terminations, suspensions, demotions, etc. with breakdown on race, color or sex?			
Does it discuss how EEO complaints are tracked?			