



**ALASKA RAILROAD CORPORATION
EQUAL EMPLOYMENT OPPORTUNITY
PROGRAM / AFFIRMATIVE ACTION PLAN**

2020 - 2024

FTA Vendor 5806

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The Federal Transit Administration has revised its EEO program submission dates to conform to a 4-year cycle. ARRC's EEO Plan for 2024-2028 is due to FTA on or before March 1, 2024.

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I. DEFINITIONS

The following definitions apply to this Plan:

- A. Affirmative Action (AA) Plan.** A written, detailed, results-oriented set of procedures designed to achieve prompt and full utilization of minorities and women at all levels and in all parts of ARRC's workforce.
- B. ARRC.** The Alaska Railroad Corporation.
- C. Availability Analysis.** A comparison of the participation rates of minorities and women at various levels in the work force with their availability in relevant labor markets.
- D. Available Labor Force (ALF).** The composition of the labor force that has the requisite skills for a specific position, a class of positions or an EEO job category.
- E. Discrimination.** Any act, or any failure to act, that has the purpose or effect of limiting, excluding, or denying a person equal employment opportunity because of race, color, religion, national origin, sex (including pregnancy, sexual orientation and gender identity), age, genetic information, veteran status, or mental or physical disability.
- F. DOT.** The United States Department of Transportation.
- G. Equal Employment Opportunity (EEO).** Equal Employment Opportunity ("EEO") is a condition under which all employment practices, including selection, transfer, promotion, termination, compensation, and other benefits, are implemented without regard to race, color, religion, national origin, sex (including pregnancy, sexual orientation and gender identity), age, genetic information, veteran status, or mental or physical disability.
- H. Goal.** A numerical or percentage objective established by ARRC that represents the good faith efforts that ARRC will make to correct any areas of underutilization that may exist at ARRC.
- I. Good Faith Efforts.** Those actions taken to achieve the objectives of this AA Plan.
- J. Minority.** The term "minority" or "minority group persons" includes the following:
 - 1. American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America) and who maintain tribal affiliation or community attachment;
 - 2. Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent;
 - 3. Black or African American, which refers to peoples having origins in any of the Black racial groups of Africa;
 - 4. Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race;

5. Native Hawaiian or Other Pacific Islander, which refers people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands; and
6. Multiracial populations, which include individuals with origins in more than one of the federally designated racial categories.

- K. National Origin.** The particular nation where a person was born or where the person's parents or ancestors were born.
- L. Parity.** A situation in which the percentage of an EEO group within a given specific position, a class of positions, or an EEO job category is equal to the corresponding percentage in the ALF.
- M. Underutilization.** A condition where there are fewer minorities or women in a particular job category than would reasonably be expected based on their availability in the relevant labor force.
- N. Utilization Analysis.** An analysis of the work force, consisting of a Work Force Analysis and an Availability Analysis, conducted to determine whether there is an underutilization of women and minorities in the work force in relation to their availability in the relevant labor market.
- O. Work Force Analysis.** A statistical breakdown of the work force by job category cross-referenced by ethnicity and gender.

II. STATEMENT OF EEO POLICY

As an equal opportunity employer, the Alaska Railroad Corporation (ARRC) strives to have a workforce that reflects the community we serve. No person is unlawfully excluded from employment opportunities based on race, color, religion, national origin, sex (including gender identity, sexual orientation, and pregnancy), age, genetic information, mental or physical disability, veteran status, or other protected class. This policy applies to all employment practices (including recruitment, hiring, training, promotion, transfer, demotion, layoff, termination, and compensation) and business opportunities and is in addition to and not in lieu of the ARRC's obligations and responsibilities under Title VI of the Civil Rights Act of 1964. ARRC is committed to providing reasonable accommodations to applicants and employees who need them because of a disability or to practice or observe their religion, absent undue hardship.

The ARRC is fully committed to, and has adopted, an Equal Employment Opportunity Program setting forth the policies, practices and procedures, and goals and timetables for the benefit of ARRC, its employees and applicants, and to making the EEO Program available for inspection by any employee or applicant for employment upon request. At any time, the ARRC's EEO Program is available to ARRC employees and the public on the ARRC's corporate website at www.alaskarailroad.com.

All employees and applicants have the right to file complaints alleging discrimination with ARRC or with the Federal Transit Administration with regard to this Program (see Section X of the EEO Program for further information regarding complaints). Retaliation against an individual who makes a charge of employment discrimination, participates in an employment discrimination proceeding (such as an investigation or lawsuit) or otherwise engages in protected activity is strictly prohibited and will not be tolerated.

As ARRC's President and CEO, I maintain overall responsibility and accountability for ARRC's compliance with its EEO Program. The responsibility for implementation of the ARRC's EEO Program, including program preparation, monitoring, and oversight of complaint investigation, is primarily assigned to the ARRC's Deputy Chief Counsel, Tina Sellers Wareham. In this capacity, the Deputy Chief Counsel reports directly to me. All management personnel share in the ARRC's EEO responsibility, however, and will be assigned specific tasks to ensure that compliance is achieved. Managers and supervisors will be evaluated on the success of the ARRC's EEO Program in the same way as their performance on other ARRC goals.

I am personally committed to a workplace that acts upon its daily responsibility to treat all applicants and employees with dignity and respect, as well as equitably under the guidelines of our EEO Program.

ALASKA RAILROAD CORPORATION

Dated: _____

2/21/2020



Bill O'Leary

President and Chief Executive Officer

III. PURPOSE OF THE EEO PROGRAM

The purpose of the EEO Program is:

- A. DOT Assurance.** To provide a mechanism for implementing and monitoring ARRC's assurance to DOT that it will not discriminate against anyone on the basis of race, color, religion, national origin, sex, age, genetic information, veteran status, or mental or physical disability by prohibiting anyone from participating in, denying them the benefits of, or subjecting them to discrimination under any project, program, or activity funded in whole or in part by DOT; and
- B. Affirmative Action Plan.** To implement an Affirmative Action (AA) Plan to ensure that applicants are employed, and that employees are treated during employment, without regard to race, color, religion, national origin, age, sex, genetic information, veteran status, or physical or mental disability. The actions covered by the AA Plan include, but are not limited to hiring, promotion or upgrading, demotion, transfer, recruitment or recruitment advertising, layoff or termination, disciplinary actions, rates of pay or other forms of compensation, and selection for training, including apprenticeship.
- C. To Supplement ARRC Policy No. 62-1 (Attachment A).** ARRC Policy 62-1 is used as a day-to-day guide for ARRC employees and supervisors on the appropriate way to conduct themselves and their business decisions in the workplace. This EEO Program is supplemental to, and is not in lieu of, Policy 62-1.

IV. DISSEMINATION OF EEO PROGRAM

ARRC's program will be disseminated both internally and externally to employees and applicants for employment and will be published on ARRC's external corporate website.

- A. Internal Dissemination.**
 - 1. ARRC managers and supervisors will be informed of ARRC's EEO policy and program by actions such as:
 - a. Written communication from the President and CEO;
 - b. Discussions of the EEO Program and its implementation at ARRC Senior Staff meetings, at least semi-annually;
 - c. Participation in training within 90 days of appointment as a supervisor or manager and periodically thereafter; and
 - d. Broad electronic dissemination via the ARRC corporate website, which is available to all employees.

2. ARRC non-supervisory staff will be informed of the ARRC's EEO policy and program by actions such as:
 - a. Posting official EEO posters and ARRC's Policy Statement on bulletin boards and in the ARRC Human Resources Department;
 - b. Providing written communication from the President and CEO;
 - c. Discussing the ARRC EEO Program as part of employee orientation and training sessions;
 - d. Posting the ARRC EEO Policy on the internal employee web page and posting the EEO Plan on the ARRC's corporate website; and
 - e. Meeting with all employees and affinity groups to seek input on program implementation.

B. External Dissemination.

1. ARRC will post information about its EEO Plan on its corporate website.
2. All ARRC advertisements for personnel will include a statement that the ARRC is an "Equal Employment Opportunity Employer."
3. ARRC will disseminate its EEO policy to recruitment entities (e.g., employment agencies, educational institutions, and minority and women's organizations) when it performs outreach or distributes advertising to those entities.

V. RELEVANT CORPORATE ORGANIZATION CHART

The relevant portion of the ARRC Corporate Organization Chart is attached as **Attachment B**.

VI. DESIGNATION OF PERSONNEL RESPONSIBILITIES

The ARRC Deputy Chief Counsel currently serves as the ARRC EEO Manager and is responsible, along with other ARRC staff, for monitoring ARRC's accomplishments under this AA Plan and for ensuring that the appropriate information required by the Plan is maintained. The Deputy Chief Counsel, in conjunction with ARRC's Human Resources Department, will maintain and monitor accurate and up-to-date records on all applicants, hiring decisions, promotions, transfers, and terminations by race and gender.

All required documentation for ARRC's reporting obligation to DOT and all documentation that may be necessary in the event of a DOT compliance review will be maintained.

A. ARRC's Deputy Chief Counsel.

The EEO Manager responsibilities of the Deputy Chief Counsel include:

1. Developing a written and approved EEO policy statement and EEO Program/AA Plan;
2. Distributing the EEO Program internally and externally, to include auditing postings of the EEO policy statement to ensure it is posted and up to date;
3. In conjunction with HR, periodically reviewing employment practices policies (e.g., hiring, promotions, training) complaint policies, reasonable accommodation policies, performance evaluations, grievance procedures, and union agreements;
4. Overseeing the investigation and processing of internal complaints of discrimination, and monitoring the complaint process to ensure that all individuals investigating EEO complaints receive EEO investigative training and that the process is conducted within established timeframes;
5. With the help of HR, collecting and analyzing employment data, identifying problem areas, setting goals and timetables, and developing programs to achieve goals;
6. Designing, implementing, and monitoring internal audit and reporting systems to measure Plan effectiveness and to determine where progress has been made and where further action is needed;
7. With HR, reporting at least semiannually to ARRC's President and CEO on each department's progress in relation to ARRC's goals;
8. Serving as liaison between the ARRC, federal, local, and state governments, regulatory agencies, minority, women's and disability organizations, and other community groups;
9. Coordinating with HR to advise employees and applicants of available training programs and professional development opportunities, and their entrance requirements;
10. Assisting the ARRC Manager, Training and Development with training managers and employees on EEO requirements, policies and responsibilities;
11. Assuring legal information affecting affirmative action is disseminated to responsible officials;
12. Concurring in the hiring and promotion process;
13. Reviewing ARRC's nondiscrimination plan with all managers and supervisors to ensure that the policy is understood; and

14. Maintaining distance between the fact-finding and defensive functions of the ARRC Legal Department by ensuring that any attorney who provides legal expertise to the EEO Manager is not the same attorney who represents ARRC in an EEO complaint arising from the same case.

B. Other ARRC Personnel.

Although the ARRC Deputy Chief Counsel has primary responsibility for implementing ARRC EEO Program, carrying out EEO and affirmative action is an integral function of all officials, managers, and supervisors. All of management bears the responsibility for ensuring that ARRC complies with all of its EEO policies and programs. Managers and supervisors are required to ensure all employees are provided equal opportunity with regard to all employment-related decisions, including transfers, hiring, promotions and training.

1. Managers and supervisors are expected to carry out the following responsibilities, as part of their job, in implementing the ARRC EEO Program:
 - a. Participating actively in periodic audits of all aspects of employment in order to identify and remove barriers obstructing the achievement of specified goals and objectives;
 - b. Reviewing the qualifications of all employees to ensure that minorities and women are given full opportunities for transfers, promotions, training, salary increases, and other forms of compensation;
 - c. Holding regular discussions with other managers, supervisors, and employees to assure ARRC's policies and procedures are being followed;
 - d. Participating in the review or investigation of complaints of discrimination;
 - e. Conducting and supporting career counseling for all employees; and
 - f. Participating in periodic audits to ensure that ARRC is in compliance with its EEO obligations.
2. ARRC's Human Resources Department will:
 - a. Assist in identifying problem areas and establishing corporate goals and objectives;
 - b. Coordinate with the Deputy Chief Counsel on the types of information and statistics required by this AA Plan;
 - c. Compile and maintain all such information and statistics;
 - d. In conjunction with the Deputy Chief Counsel, review all selection, promotional, and training procedures to ensure that they are nondiscriminatory;

- e. Ensure that there is no conflict of interest between the EEO Manager's duties and responsibilities and those of the Chief Human Resources Officer or other HR staff member; and
 - f. The Chief Human Resources Officer will make a presentation to ARRC's President/CEO and the members of the Senior Staff every six months to brief them on ARRC's EEO Program. This presentation will include:
 - 1. ARRC's over/underutilization status at the beginning of the six month period;
 - 2. The hiring, promotional, or transfer opportunities that arose during the previous six months;
 - 3. The outcome of the hiring, promotional, or transfer opportunities that occurred during the previous six months; and
 - 4. The effect of those employment actions on ARRC's over/underutilization status and ARRC's short and long term EEO goals.
3. ARRC Employees will support and adhere to the EEO Program by:
- a. Exhibiting and maintaining an atmosphere free from all forms of unlawful discrimination;
 - b. Exhibiting an attitude of respect, courtesy, and cooperation toward fellow employees, contractors and the public;
 - c. Assisting supervisors and managers in carrying out their responsibilities with regard to the EEO Program; and
 - d. Understanding and complying with the EEO Policy and Procedures and AA Plan.

VII. ASSESSMENT OF EMPLOYMENT PRACTICES

- A. General.** As part of its efforts to carry out this EEO Program and AA Plan, ARRC will conduct a detailed assessment of present employment practices to identify those practices that may operate as employment barriers and unjustifiably contribute to underutilization. All problem areas will be identified and a proposed program of remedial, affirmative actions established.

See also the narrative descriptions in subsections E through N below and the statistical analyses contained in **Attachment C**.

- B. Conducting the Assessment.** The assessment and identification of problem areas will evaluate the impact of the ARRC's employment practices on all of its employment patterns including recruitment, selection, promotion, termination, transfer, layoff, disciplinary action, compensation and benefits, and training. This assessment will be conducted using the following guidelines and should include:

1. A narrative description and an analysis of current recruitment and selection policies and procedures, to include a careful evaluation and review of every step of the employee selection process to ensure that job requirements, hiring standards, and methods of selection and placement are nondiscriminatory. This assessment may include a review of position descriptions, application forms, recruitment methods and sources, interview procedures, test administration and a determination of their nondiscriminatory impact and validity, educational prerequisites, referral procedures, and final selection methods;
2. A narrative description and analysis of seniority practices and provisions where they differ for union and non-union workers;
3. A narrative description and analysis of policies and standard procedures for promotions and transfers, with an explanation of the criteria for advancement and the manner in which employees are made aware of the standards to meet;
4. Descriptions of formal and informal training programs and policies and procedures for selection of training candidates, with an evaluation of the impact of training practices on promotion opportunities and a description of efforts to locate, qualify, and train employees in protected classes;
5. A narrative description and analysis of procedures and practices regarding wages, salary levels, and other forms of compensation and benefits, to include review of wage and salary structure to ensure discrimination is not occurring with respect to compensation and review of all benefits (e.g., retirement and medical plans) to confirm they are equally available to all employees;
6. A narrative description and analysis of disciplinary procedures and discharge and termination practices, with separate analyses for employees subject to different disciplinary processes (e.g., represented and non-represented employees); and
7. A reasonable assessment to determine if the employment of affected classes of persons is inhibited by external factors (e.g., not knowing where to apply for jobs or the availability of bilingual materials and information).

The narrative descriptions and analyses should be presented in a detailed fashion. Where written, formal, or scored tests are used in the employment selection process, the ARRC should identify the test, describe the procedures followed in administering and scoring the test, the weight that is given to test scores, how a cut-off score is established, and whether the test has been validated to predict or measure job performance and if so, an assessment of its nondiscriminatory impact, and a description of the validation study. All other selection procedures must comply with the requirements of 29 CFR Part 1607, the Uniform Guidelines for Employee Selection (“Guidelines”). In general, the Guidelines require that a selection procedure that has an adverse impact on the employment of minorities or women must be validated or otherwise justified as necessary for successful job performance, in accordance with procedures specified in the Guidelines.

C. Statistical Data. ARRC's analyses will contain statistical data to document, at no less than an annual basis, the impact of the employment practices by minority status and sex. At a minimum, the analyses will contain the following:

1. The number of applicants for employment in each job category and the number hired within the past year, cross-referenced by sex and race (**Attachment C**);
2. The number of employees in each job category who applied for promotion or transfer within the past year and the number in each job category promoted or transferred, cross-referenced by sex and race (**Attachment C**);
3. The number and types of disciplinary actions (e.g., notation of oral warning, suspension, termination) within the past year, tailored to the language used in union contracts and ARRC policies and procedures (**Attachment C**).
4. The number of involuntary terminations, cross-referenced by sex and race (**Attachment C**).
5. Job category training that fosters promotion potential, cross-referenced by sex and race (**Attachment C**).

In collecting employment practice data, ARRC will (1) follow privacy protocols that comply with applicable law, (2) protect self-identifying information by keeping it separate from application materials, and (3) clearly explain such protocols to any applicants and employees invited to self-identify.

To complete the statistical assessment of employment practices each year, ARRC will complete spreadsheets by providing current, accurate, and relevant data accompanied by a narrative explaining the source of the data and the results of the analysis, without (as permitted by FTA) analysis for any groups constituting less than 2 percent of the applicable workforce.

D. Affirmative Action To Remedy Problem Areas. In the event that ARRC's analyses indicate that any of ARRC's employment practices operate as an employment barrier or unjustifiably contribute to underutilization, ARRC will develop affirmative action steps to correct the problem areas.

E. Recruitment.

1. Represented Positions - ARRC has five collective bargaining agreements that dictate recruitment efforts for represented positions. To fill these positions governed by a collective bargaining agreement, the terms and conditions set forth in the respective contracts are followed. Many vacancies are filled first by internal qualified bidders, holding seniority in their respective union. Internal bid bulletins are posted to fill vacancies as well as shift and location assignments. All other position vacancies are posted on Workplace Alaska, the State of Alaska's on-line recruitment and application

system, and if deemed appropriate, local Alaska newspapers, as well as local job services and other organizations to reach women and minorities. Only after it is determined there are no qualified internal applicants may an outside candidate be considered.

2. Non-Represented Positions - Positions may be advertised internally, externally, or both in conformance with ARRC Hiring Policy 64-1. Externally all positions are posted on Workplace Alaska, the State of Alaska's on-line recruiting system, in addition to being distributed to state and local job services and other organizations to reach women and minorities. Additional advertising may be placed in appropriate local and national newspapers, journals and websites.

ARRC participates in career fairs in Anchorage, Alaska (e.g., The Anchorage Citywide Job Fair and/or the Anchorage Daily News Job Fair) and in Fairbanks, Alaska (The UAF Spring Job Fair and/or the Fairbanks Job Center Career Expo), the two main urban locations in the state. When possible, ARRC attends fairs in Seward, Alaska as well. ARRC also participates in the Veterans' and Military Spouses' Job Fair, the Mat-Su Job Fair, and, starting in 2020, the Alaska Federation of Natives Convention. In recent years, the ARRC has begun to post its positions on Glassdoor, Craigslist and other websites. In addition, all vacancy notices at the ARRC are sent to the addresses listed on **Attachment D**, many of whom directly serve both women and minorities.

- F. Selection of Applicants.** All selections are based on applicant's skills, knowledge and abilities as they relate to the position. For represented positions, seniority is a key determinant.
- G. Rating of Applicants.** Ratings are based on the strength of a particular attribute that an applicant possesses in each of the required skills, knowledge and abilities as advertised in the vacancy announcement and position description.
- H. Internal Movements.** All represented or non-represented employees have the opportunity to apply for vacant positions for which they qualify. However, union seniority plays a key role in determining the selection. Selection is based on the applicant's skills, knowledge, and abilities as they relate to the position. In some instances, positions are reclassified to reflect current job duties which may result in a grade change, upward or downward, of the position.

There are a number of positions that are established as flex-staff positions. This means the incumbent is assigned to an initial entry level position and advances based on accomplishment of training and additional assignment levels to intermediate and advanced proficiency levels. Examples of this include: Passenger Service Agent, Track Laborer, Locomotive Engineer Conductor Trainee, Engineering Technician, Service Desk Specialist, Signal Maintainer, Communications Technician, Reservations Inventory Specialist, and Contract Administration Specialist.

- I. Job Evaluation.** ARRC's Chief Human Resources Officer reviews, assesses, clarifies, and approves newly established or updated position descriptions, ensuring they are evaluated based only on the necessary knowledge, skills, and abilities required to perform the essential duties and functions of the position.

J. Application Forms/Packets. In March 2014, ARRC began using Workplace Alaska, the State of Alaska's on-line recruiting system. With the exception of Director or above appointments, all ARRC recruitment bulletins are posted on Workplace Alaska. In accordance with the provisions of the ARRC collective bargaining agreements, in-house bid bulletins to determine shift or location are only posted internally. The public and ARRC employees may access Workplace Alaska online or through ARRC's internal intranet site.

K. Tests. As a method of determining preparedness and qualifications for a specific position, the ARRC may test an applicant's job specific skills, knowledge or abilities as they relate to the position. For example, applicants applying for administrative positions are tested on Microsoft Word and Excel if the position requires such skills. Applicants must visit a Job Center to take the requisite typing test or other skills-based test. If a position requires a particular physical skill or amount of exertion, ARRC may conduct physical demonstrations to determine if an applicant is qualified for the position.

In addition to pre-employment testing, some positions occupied by current employees require periodic testing to maintain various certifications and licensing.

L. Training/Employee Development.

1. Eligibility - The ARRC Training and Development Program is open to all employees, both represented and non-represented, and includes all current full-time and part-time employees with the exception of special services employees.

Each eligible employee can pursue training that is appropriate to the employee's position, skills, and individual/unique developmental needs as assessed and approved by their supervisor. ARRC Training and Development can provide foundation skills that can be used to build quality performance on the job. At the same time, work leaders, foremen, supervisors and managers can obtain training to gain an enhanced understanding of their professional areas through multi-level course offerings.

2. Components of the ARRC Training Program - The ARRC Training and Development Program is comprised of several distinct components that offer a broad array of opportunities to the motivated employee. The employee, in conjunction with their supervisor, can select any or all avenues to foster expansion of their basic skills or professional knowledge. The components of the training and development function include:

- On-the-Job Training
- The ARRC Leading by Design Program
- External Training

3. On-The-Job-Training (OJT) - Departments throughout the railroad offer on-the-job training to keep employees current on the latest systems, technologies and methods used in performing their jobs. Frequently, OJT begins with orientation training focused on the work of the department, the operation of various pieces of equipment, and may

include Safety Training, CPR/AED/First Aid Training, Policy and Procedure training, or other applicable training that provides a basic foundation to the skills needed to perform one's job well. Generally, this training is organized by the supervisor and may be delivered internally or externally.

4. ARRC Leading by Design Program - The ARRC Leading by Design modules are an organized program of courses offered to employees on an ongoing basis throughout the year. The entire curriculum consists of twelve topic areas that contain courses to help advance the professional skills and knowledge of any employee who chooses to participate in course offerings. The ARRC Leading by Design modules are organized and administered by the Human Resources Department and reflect topics that support the business of the organization and the professional skills required in today's business environment.

The Quarterly Training Calendar is published during the first week of the quarter and is posted on the ARRC Intranet. For a complete listing of the available course topics and other training resources, employees and managers can contact the Manager of Training and Development.

Costs: There is no cost for participating in ARRC-sponsored training classes. Supervisors may incur minimum costs for special programs or materials used in presenting courses customized for their department and for the CPR/First Aid courses.

Participation: To enroll in any ARRC-sponsored training class, employees simply call the Human Resources Department in advance of the class to secure a place in the training session of their choice. Employees may also email the Training and Development Manager to enroll in the training session of their choice.

5. Internal Bidding Opportunities. ARRC also provides opportunity for on-the-job training geared primarily for represented employees. For example, employees are trained internally on the operation of various pieces of equipment. Once qualified on the equipment, the respective collective bargaining agreement allows the individual to bid on openings and when awarded receive a higher rate of pay. The specific terms and conditions for internal bidding are outlined in the respective collective bargaining agreements.
6. External Training. Employees may be required to attend certain courses that are not offered in-house. Programs that are offered through the community, through professional organizations, or through public vendors may be attended by employees with permission from their supervisor and the Department Executive.

Costs: The cost of attending public training or educational programs is the responsibility of the department authorizing the training. Employees attending external training must complete the Training Request/Authorization form, which identifies all educational fees, per diem costs, and travel costs required for course attendance.

- 7 Learning Management System. Data is not currently collected on job training participation by sex and race. However, ARRC will employ its Learning Management System (LMS), initially launched in 2019, to begin compiling these data parameters. The LMS provides the ability to track training requirements and attendance, and gives ARRC the option to deliver training online. The LMS is accessible to all employees.

M. Wages, Salaries, Other Forms of Compensation and Benefits.

1. Represented Employees - Salaries and benefits are governed by the individual terms and conditions outlined within the respective collective bargaining agreements. They vary among unions and positions and are generally seniority based. Negotiated employee benefits include health and life insurance, defined benefit retirement plan and optional participation in a 401(k) deferred savings plan. Employees are also eligible for annual and sick leave accrual at varying rates depending on length of service.
2. Non-Represented Employees - Salaries fall within a range depending on the scope, responsibility and grade of the position. Non-represented wages are reviewed by the Chief Human Resources Officer to ensure there is no unlawful discrimination. Non-Represented employees are entitled to health insurance, life insurance, defined benefit retirement plan, and 401(k) and 457 tax deferred savings options. In addition, non-represented employees accrue annual and sick leave at varying rates based upon years of service.

N. Discipline.

1. Employees represented by a union.

The ARRC has a collective bargaining relationship with five separate unions. Although the disciplinary procedures may vary in minor detail from union to union, the basic format is the same for all represented employees.

Disciplinary actions include Notations of Oral Warning, Letters of Reprimand, Suspension, and Termination. Disciplinary actions are taken only for just cause and are issued in accordance with the theories of progressive discipline.

Employees who are to be terminated or suspended are entitled to a formal hearing before their suspension or termination. Employees are entitled to union or co-worker representation at the formal hearing, and all hearing procedures comply with the principles of due process.

Employees who believe that discipline issued to them is a violation, misinterpretation or misapplication of the collective bargaining agreement may grieve the actions taken against them at Step One of the grievance process, which involves the employee's immediate supervisor. If the employee's grievance is not granted at Step One, the union may advance the grievance to higher steps, and ultimately to arbitration. The decision of the arbitrator is final and binding on the parties.

In addition to the above disciplinary procedures, each collective bargaining agreement at the ARRC also contains a provision for Alternative Discipline, which allows management and union representatives to agree upon disciplinary actions other than the traditional ones set forth in the collective bargaining agreement.

2. Employees not represented by a union.

All ARRC employees not subject to a collective bargaining agreement are covered by ARRC Policy 61-1, "Corrective Action and Disciplinary Action for Non-Represented Employees." Under this policy, non-represented employees are divided into two categories of employees: Key Executive employees and Executive employees. Key Executive employees occupy positions at a high level of management that require a harmonious working relationship with, and the confidence of, all levels of management. All other non-represented employees are Executive employees.

Key Executive employees serve at the pleasure of the President and CEO and may be disciplined and terminated at will. Executive employees may be disciplined if the corporation is, in good faith, dissatisfied with their performance, conduct, or attitude.

Disciplinary actions under Policy 61-1 include Major Disciplinary Actions (termination, involuntary demotion with a reduction in pay, and suspension without pay), Minor Disciplinary Actions (written reprimand), and Corrective Action (generally verbal discussions). Major Disciplinary Actions begin with written notice to the employee of the proposed disciplinary action. A hearing is then scheduled to allow the employee to present evidence and witnesses to support his or her position. After the hearing, the impartial hearing officer issues findings determining whether the charges brought against the employee have been sustained. If they have not, the charges are dismissed and the employee's record is cleared of references to the charges. If they have, the findings are submitted to the relevant Vice President, who determines what level of discipline is warranted.

The decision to terminate a non-represented employee is "final agency action" for the purpose of judicial review of administrative action. Accordingly, a non-represented employee may file an action in the Superior Court for the State of Alaska seeking review of the employee's termination from the ARRC.

VIII. UTILIZATION ANALYSIS

- A. Purpose.** ARRC will perform a Utilization Analysis, consisting of a Work Force Analysis and an Availability Analysis, in order to identify any job categories in which there may be an underutilization of minorities and women in relation to their availability in the relevant labor market. The utilization analysis is also used to help formulate the need for timetables, goals, and other affirmative actions to correct employment practices that may have contributed to any identified underutilization.

1. Work Force Analysis. ARRC will perform a statistical breakdown of its work force by department, job category, and job title, and cross reference this breakdown by minority status and sex. This analysis is based on categories and data used in the EEOC EEO-4 report.
2. Availability Analysis. ARRC will perform an availability analysis that compares the participation rates of women and minorities at various levels in the ARRC work force with their availability in relevant labor markets, using both the geographic and occupational components of the labor market.

See **Attachment E.**

The ARRC's analysis is performed using the following job group definitions:

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. Includes: department heads, bureau chiefs, division chiefs, directors, deputy directors, controllers, wardens, superintendents, sheriffs, police and fire chiefs and inspectors, examiners (bank, hearing, motor vehicle, warehouse), inspectors (construction, building, safety, rent-and-housing, fire, A.B.C. Board, license, dairy, livestock, transportation), assessors, tax appraisers and investigators, coroners, farm managers, and kindred workers.

Professionals: Occupations that require specialized and theoretical knowledge which is usually acquired through college training or through work experience and other training which provides comparable knowledge. Includes: personnel and labor relations workers, social workers, doctors, psychologists, registered nurses, economists, dietitians, lawyers, systems analysts, accountants, engineers, employment and vocational rehabilitation counselors, teachers or instructors, police and fire captains and lieutenants, librarians, management analysts, airplane pilots and navigators, surveyors and mapping scientists, and kindred workers.

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. Includes: computer programmers, drafters, survey and mapping technicians, licensed practical nurses, photographers, radio operators, technical illustrators, highway technicians, technicians (medical, dental, electronic, physical sciences), police and fire sergeants, inspectors (production or processing inspectors, testers and weighers), and kindred workers.

Protective Service Workers: Occupations in which workers are entrusted with public safety, security and protection from destructive forces. Includes: police patrol officers, firefighters, guards, deputy sheriffs, bailiffs, correctional officers, detectives, marshals, harbor patrol officers, game and fish wardens, park rangers (except maintenance), and kindred workers.

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. Includes: bookkeepers, messengers,

clerk-typist, stenographers, court transcribers, hearing reporters, statistical clerks, dispatchers, license distributors, payroll clerks, office machine and computer operators, telephone operators, legal assistants, sales workers, cashiers, toll collectors, and kindred workers.

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. Includes: mechanics and repairers electricians, heavy equipment operators, stationary engineers, skilled machining occupations, carpenters, compositors and typesetters, power plant operators, water and sewage treatment plant operators, and kindred workers.

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. Includes: chauffeurs, laundry and dry cleaning operatives, truck drivers, bus drivers, garage laborers, custodial employees, gardeners and groundkeepers, refuse collectors, construction laborers, park rangers (maintenance), farm workers (except managers), craft apprentices/trainees/helpers, and kindred workers.

B. Determination of Underutilization. After completing the Work Force and Availability Analyses, ARRC will determine whether the analyses show that ARRC is underutilized in job categories.

1. Definition of Underutilization. For purposes of this Plan, the term “underutilization” means having fewer minorities or women in a particular group than would reasonably be expected by their availability.
2. Effect of Determination. A determination that ARRC is underutilized in a particular job category does not amount to an admission of impermissible conduct. It is neither a finding of discrimination nor a finding of a lack of good faith affirmative action efforts. Rather, “underutilization” is a technical targeting term used by ARRC in seeking to apply good faith efforts to increase the percentage utilization of women and minorities in its work force.

C. Availability Analysis.

The availability analysis incorporates information on the availability of women and minorities in the workforce at large and analyzes their participation rates at the various levels of the workforce in comparison with their availability in the relevant labor market.

Work force data for the labor area are obtained from the most recently available United States Census, Equal Opportunity File for Alaska, which was prepared and provided by the Alaska Department of Labor, Research and Analysis Section in September 2016. Alaska unemployment information was also obtained from the Department of Labor and Workforce Development, Research and Analysis Section.

For the purposes of this analysis, the surrounding labor area and the immediate labor area are the State of Alaska census area. This is also the area in which ARRC can reasonably recruit for each EEO Category.

1. Population For Alaska by Ethnic Group and Gender - This data provides the percentage of the minority and female population of the State Alaska, which is obtained by dividing the minority and female population by the total population. ARRC uses the percentage which considers the availability of minorities and women seeking employment in the State of Alaska, rather than the entire percentage population figure used for the minority calculation. The female unemployment rate for the State of Alaska is used to determine female availability for this factor.
2. ARRC's Workforce Compared to the Available Labor Force - The percentage of the minority and female work force as compared with the total work force in the State of Alaska. The percentage of availability is derived by dividing the total minority and female work force by the total work force.
3. Internal Opportunities - The availability of promotable and transferable minorities and women within ARRC. The availability figure is calculated by conducting an Internal Availability Analysis that examines each EEO Category for the percentage of minorities and women eligible for promotions or transfers to each EEO Category.
4. Universities or Institutions of Higher Learning - In the State of Alaska there are numerous institutions of higher learning including: Alaska Pacific University, University of Alaska (UA), with campuses throughout the State of Alaska; Alaska Vocational Technical Center, Ilisagvik College, Charter College, Alaska Job Corps, and options for travel industry training. In addition there are opportunities for apprenticeships and training in trades such as electrical, plumbing, and truck driving.

IX. Goals and Timetables

A. Establishment. If ARRC's Utilization Analysis indicates that ARRC is underutilized in one or more job categories, ARRC will establish percentage and numerical goals (using the whole-person rule), along with timetables for the next four-year period, for any categories of underutilization identified in the utilization table. ARRC will record its short and long term goals in the utilization table.

1. Long Range Goals. ARRC will establish long range goals to be attained within a period of two to four years, taking into consideration both the current and future projected availability of traditionally underutilized groups and opportunities to add employees due to any projected increases in capital or operating funds.
2. Short Term Goals. ARRC will establish short term goals representing anticipated net changes in the number and percentage of women and minority employees by job category in the next year. Short term goals will be based on anticipated job openings,

job group availability, and long term goals set by the ARRC for minorities and women in the particular job category.

3. Developing Goals and Timetables. In developing goals and timetables to correct underutilization, the ARRC will:
 - a. Involve the Management Team, Human Resources staff, department heads, managers, and supervisors;
 - b. Establish goals that are significant, measurable, and attainable;
 - c. Develop specific goals with timetables geared for planned results;
 - d. Consider anticipated attrition, expansion, use of contract labor, succession planning, and turnover statistics in the context of availability of persons with required skills;
 - e. Consider the effects of changes in existing employment practices that may contribute to underutilization in increasing availability of minorities and women; and
 - f. Set flexible goals that are reasonably attainable by applying every good faith effort to make all aspects of the nondiscrimination program work.

B. ARRC Goals and Timetables for FY 2016-2020. Attachment F.

For a Report on ARRC's Short Term Goals for 2016-2020, see **Attachment G**.
ARRC Goals and Timetables for FY 2020-2024, see **Attachment E**.

EFFECT OF ESTABLISHMENT OF PLACEMENT GOAL. The establishment of a goal by ARRC is not an admission of impermissible conduct. It is neither a finding of unlawful discrimination nor a finding of lack of good faith efforts on the part of ARRC. Rather, the establishment of a goal is a good faith effort by ARRC to increase, in the future, the percentage utilization of minorities and women in the workplace.

C. ARRC Good Faith Efforts to Correct Underutilization and Ensure Non-Discrimination.

ARRC undertakes the following good faith efforts to correct underutilization and ensure non-discrimination:

1. First and foremost, ARRC strives to build and maintain a diverse workforce in which everyone, regardless of age, race, sex, national origin, color, religion, disability, or gender, can feel valued as an individual, work together in an environment in which they are treated with dignity and respect, and have the opportunity and the freedom to exchange ideas and contribute to ARRC's mission.

2. ARRC endeavors to ensure that ARRC is free from discrimination, harassment, and unlawful bullying through the enforcement of the ARRC EEO Policy and the provision of an open complaint process.
3. ARRC regularly reviews its recruitment strategies to ensure that it is reaching broad segments of the population.
4. ARRC exerts retention efforts and provides professional development opportunities for underutilized groups equal to the efforts and opportunities afforded others in the workforce.
5. ARRC is developing a succession plan that includes the consideration of and opportunity for the upward mobility of internal employees.
6. ARRC reviews its benefit packages and its employee compensation for purposes of attracting and retaining qualified applicants and employees.
7. ARRC ensures that background checks and their results are narrowly tailored and used to meet the business demands of the position in order to avoid any disparate impact on minorities and women;
8. ARRC's hiring practices provide that, where appropriate, the educational requirements of positions may be substituted by job-related experience to avoid any adverse impact on minorities and women.
9. ARRC Human Resource Department works closely with hiring supervisors and hiring committees to draft job-related, non-discriminatory interview questions for the hiring process.
10. ARRC participates in local career fairs to inform the public about employment opportunities at ARRC and attract interested applicants from all segments of the community and state.
11. The Chief Human Resources Officer reviews and approves all salaries for new hires, promotions, and transfers to ensure that there are no unlawful differences between the wages offered to men, women, minorities, and non-minorities for positions requiring the same work.
12. All applications for all position vacancies are carefully reviewed by HR to ensure that every applicant, regardless of EEO status, is given a full opportunity for hire, transfer, and promotion.
13. Although ARRC does not have a formal career counseling program, the HR Department does have an open door policy for all employees and applicants for employment who wish to learn how to better their chances for advancement or for hire.
14. Performance evaluations are mandatory for all ARRC employees not represented by a union. ARRC evaluates the performance of non-represented employees based on the success of the EEO Program in the same manner as ARRC evaluates their performance in other ARRC programs.

15. The ARRC prohibition of nepotism applies to all employees and all supervisors at all levels.
16. The ARRC HR Department uses media such as LinkedIn.com and other popular job search websites as an outlet for finding and contacting potential top managerial applicants as well as passive and active candidates.
17. ARRC advertises all of its vacancy notices on Workplace Alaska, the State of Alaska's large, all-encompassing website for employee recruitment. This site is available to everyone in the public at large.
18. In an effort to reach out to a broad recruitment audience, including all minorities and women, ARRC sends all of its vacancy notices to the entities listed in **Attachment D**.

X. MONITORING & REPORTING

- A. Establishment.** ARRC will establish an effective and workable internal monitoring and reporting system to:
 1. Assess the results of actions plans taken since the last program submission;
 2. Enable ARRC to evaluate (semi-annually, at a minimum) its EEO Program during the year and to take any necessary corrective action regarding the development and execution of programs, goals, and timetables; and
 3. Produce documentation that supports actions to implement the EEO Program for minority and female applicants or employees and informs management of the program's effectiveness.
- B. Monitoring.** Various monitoring responsibilities are specified Section VI of ARRC's EEO Program. Additionally, the Deputy Chief Counsel, as EEO Manager, will confirm and maintain a record of EEO Program dissemination upon release of new or updated Program documents, and will monitor EEO complaints on an ongoing basis to ensure they are processed in accordance with the provisions of the ARRC's Equal Employment Opportunity Policy and Procedures (see Section XI).

To aid in the monitoring function, ARRC will maintain an EEO Program Implementation Checklist of all activities required to implement the components of its EEO Program. The checklist will identify the persons responsible for fulfilling the range of EEO activities and the intervals at which these activities will take place. This checklist will be reviewed at semi-annual meetings between the Chief Human Resources Officer and Deputy Chief Counsel to ensure that the required activities are being completed and to identify any additional actions or activities that should be added to fulfill ARRC's EEO responsibilities.

C. Reporting. The Chief Human Resources Officer will make a presentation to ARRC's President/CEO and the members of the Senior Staff every six months to brief them on the ARRC's EEO Program. This presentation will include:

1. ARRC's over/underutilization status at the beginning of the six month period;
2. The hiring, promotional, or transfer opportunities that arose during the previous six months;
3. The outcome of the hiring, promotional, or transfer opportunities that occurred during the previous six months; and
4. The effect of those employment actions on ARRC's over/underutilization status and the ARRC's short and long term EEO Goals.

Prior to and in conjunction with this meeting, the Deputy Chief Counsel and Chief Human Resources Officer will meet, also semi-annually, to review current EEO goals and statistics on employment practices and policies and to discuss EEO Program implementation topics.

ARRC will maintain records documenting implementation of the EEO Program, including:

- Completed EEO Program Implementation Checklist for each year, covering EEO-related activities overseen or coordinated by the HR Department and the Deputy Chief Counsel;
- Agendas and sign-in sheets for EEO training sessions or meetings;
- A description of follow-up items and outcomes from meetings related to EEO Program implementation;
- Documentation of EEO complaints and monitoring of the EEO complaint process.

XI. COMPLAINTS OF DISCRIMINATION

A. Complaints to ARRC.

1. Filing of Complaint. Any person who believes that he or she, individually or as a class of individuals, has been subjected to discrimination on the basis of race, color, creed, national origin, sex, age, or mental or physical disability, a complaint with the ARRC in person at 327 West Ship Cree Avenue, Anchorage, Alaska or by mail at P.O. Box 107500, Anchorage, Alaska 99510-7500, or electronically at sellerswareharmt@akrr.com. The ARRC complaint form is available in hard copy in the ARRC Human Resources Department in Anchorage or online on the corporation's website at: <https://www.alaskarailroad.com/corporate/civil-rights>
2. Processing of the Complaint. The complaint will be processed in accordance with the provisions of the ARRC's Equal Employment Opportunity Policy and Procedures, attached to this Plan as **Attachment A**. All EEO complaints received from ARRC employees are investigated, handled, and tracked by spreadsheet by the ARRC Manager, Labor Relations within the Human Resources Department. Working independently with the Deputy Chief Counsel/EEO Manager, the Manager, Labor

Relations will complete the investigation and provide a report to the EEO Manager for a determination. All EEO complaints filed with external antidiscrimination agencies, such as the EEOC or the Alaska State Commission for Human Rights, are handled and investigated by the ARRC Chief Counsel, or his/her designee, with no involvement by the Deputy Chief Counsel. Those charges are tracked in the same manner as other litigation matters and are reported on a regular basis to the ARRC Board of Directors. Those reports are retained on an indefinite basis.

B. Complaints to DOT.

1. Filing of Complaint. Any person who believes that he or she, individually or as a member of a specific class of persons, has been subjected to discrimination on the basis of race, color, creed, national origin, sex, age, or mental or physical disability by the ARRC may file a written complaint with:

Department of Transportation
Office of the Secretary
Departmental Office of Civil Rights
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

or

Director, Office of Civil Rights
Federal Transit Administration
East Building, 1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

or

Director Office of Civil Rights
Region 10, Federal Transit Administration
915 Second Avenue, Suite 3142
Seattle, Washington 98174



2. Time of Filing. The complaint must be filed within 180 days after the date of the alleged discrimination, unless extended by the Secretary of Transportation.
3. Form of Complaint. The complaint must be in writing and signed by the complainant or his/her representative before action can be taken. The complaint shall state, as fully as possible, the facts and circumstances surrounding the alleged discrimination.
4. Processing and Investigation of Complaint. The complaint will be processed and investigated in accordance with the procedures established by DOT.

C. Summary of Complaints Filed 2016-2020. See Attachment H.

ARRC EEO Plan

Attachment A

**ARRC Policy 62-1
Anti-Discrimination and Harassment**

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I. POLICY


The Alaska Railroad Corporation (ARRC) is an equal employment opportunity employer. The ARRC complies with all applicable laws that prohibit discrimination and harassment in the workplace. It is the policy of the ARRC to ensure equal employment opportunity without discrimination or harassment on the basis of race, color, religion, gender, age, disability, genetic information, national origin, marital status, change in marital status, pregnancy or parenthood when the reasonable demands of the position do not require distinction on the basis of age, physical or mental disability, sex, marital status, change in marital status, pregnancy, or parenthood. Through enforcement of this policy and by education of employees, the ARRC will seek to prevent, correct and appropriately address behavior that violates this policy.

The ARRC expects all employees to support this policy and to comply with all applicable laws prohibiting discrimination, harassment, and retaliation in employment

No adverse employment action will be taken against any individual for exercising his or her rights under applicable law, making a good faith complaint, or assisting in an investigation under this policy. Retaliation for any such protected activity is strictly prohibited, is unlawful, and will be dealt with immediately.

ii. PURPOSE:

This policy defines prohibited discrimination and harassment and outlines responsibilities for compliance. This policy clarifies procedures available to ARRC employees and applicants who believe that they have been discriminated against or denied equal employment opportunity in any aspect of employment because of race, color, religion, gender, age, disability, genetic information, national origin, marital status, change in marital status, pregnancy or parenthood, when the reasonable demands of the position do not require distinction on the basis of age, physical or mental disability, sex, marital status, change in marital status, pregnancy, or parenthood. These factors or characteristics are referred to as "protected class status."

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III. COVERAGE:

This policy applies to all ARRC employees and applicants for employment. This policy applies to conduct on ARRC property, on ARRC business, and in any location during work time. It also applies to conduct outside of the ARRC, such as during social or business occasions and events, if the improper conduct adversely impacts the employee's work environment.

IV. DISTRIBUTION:

This policy is provided to all ARRC employees, unions, and to the general public upon request. This policy is available on the ARRC intranet and website. Managers and supervisors must ensure that employees without email access receive a hard copy of this policy.

V. REFERENCES/AUTHORITY:

A. Federal


1. Title VII of the Civil Rights Act of 1964 (as amended)
2. Age Discrimination in Employment Act of 1967
3. Section 504 of the Rehabilitation Act of 1973 Pregnancy Discrimination Act of 1978
4. The Americans with Disability Act
5. Uniform Guidelines on Employee Selection Procedures" 41 CFR Part 60-3, and 29 CFR Part 1607
6. Equal Pay Act of 1963
7. Civil Rights Act of 1991
8. Family & Medical Leave Act
9. Genetic Information Nondiscrimination Act of 2008

B. State

1. Alaska Human Rights Act, Alaska Statutes (AS) 18.80.010 et seq.
2. Pregnancy, Childbirth and Family Leave, AS 23.10.500-23.10.550

VI. RESPONSIBILITIES:


- A. *All Employees* are responsible for supporting and complying with this policy through their individual conduct and by treating each other equitably and respectfully without regard to protected class status.

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- B. *Director, Labor Relations* is responsible for the interpretation of this policy and investigation of complaints of discrimination, harassment, and retaliation.
- C. *Office of the General Counsel* is responsible for the legal interpretation of this policy and for assisting in its implementation.
- D. *Vice Presidents, Directors, Managers, and Supervisors* are responsible for monitoring and addressing unlawful conduct and behavior in the workplace and taking appropriate and timely correction when a problem is discovered.

VII. DEFINITIONS:

- A. *Age Discrimination* – Is an adverse employment action taken against an employee or applicant for employment that is based upon the individual's age, unless the reasonable demands of the position require distinction on the basis of age or the challenged action is lawfully based upon a reasonable factor other than age. Age discrimination occurs when the individual's age is the "but for" cause of the challenged adverse employment action.
- B. *Color Discrimination* – Color is an unalterable physical characteristic which may or may not be specifically associated with race. Discrimination on the basis of color may occur when individuals are treated differently because of their skin color. For example, color discrimination may occur when African American individuals are treated differently based on their lighter or darker complexion. Color discrimination may occur in the absence of, or in conjunction with, race discrimination.
- C. *Discrimination* – Any act or failure to act based on an individual's protected class status, and/or reprisal, that adversely affects privileges, benefits, working conditions, results in disparate treatment, or has a disparate impact on an individual.
- D. *Disability Discrimination* – Occurs when a qualified individual with a disability is treated less favorably because the individual: (1) has a physical or mental impairment that substantially limits a major life activity; (2) has a record of having had such impairment; or (3) is regarded as having such impairment. Major life activities include, but are not limited to: hearing, speaking, breathing, seeing, learning, walking, etc. An individual who has been discriminated

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against because he or she has a known association or relationship with a disabled individual is also protected under the law.

E. *Disparate Treatment* – The act of treating an employee or applicant for employment differently based up the individual's membership in a protected class.


F. *Disparate Impact* – Results when an employer has policies or practices that are neutral on their face but have the effect of disproportionately impacting an individual or group of individuals based upon their membership in a protected class, and the policy or practice is not job-related for the position and consistent with business necessity.

G. *Equal Employment Opportunity (EEO)* – Is a body of laws that prohibit discrimination with regard to terms, conditions, or privileges of employment, including recruiting, hiring, assignment, compensation, benefits, promotions, demotions, transfers, discipline and termination, and any form of unlawful harassment based on protected class status.

H. *Harassment*


1. *Hostile / Offensive Work Environment* – A hostile work environment results when there is discriminatory conduct or behavior in the work place that is unwelcome and offensive to an individual or a group of individuals based on protected class status. An unlawful work environment may include the inappropriate use of unwelcome slurs, jokes, or other verbal or physical conduct. In order to be unlawful, the conduct must be (a) based upon a protected class status; (b) unreasonable; (c) adversely interfere with an individual's ability to perform his or her job or advance in his or her career; and (d) create an uncomfortable, intimidating and offensive work environment. The law considers a hostile work environment to be one where communication or conduct is "severe" and "pervasive" enough that the employee(s) and a "reasonable person" would find it to be hostile and abusive. In most cases, a single isolated instance does not constitute a hostile work environment.

2. *Sexual (Gender) Harassment* – Sexual harassment can range from unwelcome sexual advances, requests for sexual favors, and/or other

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verbal or physical conduct of a sexual nature based on one or more of the following conditions: (a) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; (b) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (c) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

- I. *National Origin Discrimination* – Occurs when an individual suffers adverse employment treatment based upon the fact that the individual is from a particular country or part of the world, because of the person's ethnicity or accent, because they appear to be of a certain ethnic background, or because the individual is married to or associated with a person of a particular national origin.
- J. *Protected Class* – Is a term used in state and federal anti-discrimination law. The term describes characteristics or factors that cannot be targeted for discrimination and harassment. The following characteristics are considered "protected classes" under law and individuals cannot be discriminated against based on these characteristics: race, color, religion, gender, age, disability, genetic information, national origin, marital status, change in marital status, pregnancy or parenthood.
- K. *Race* – Race may be defined broadly as a group of persons related by a common descent or heredity. The entities that enforce racial discrimination laws include many other factors within the term "race," however, including physical characteristics associated with a particular race; illnesses associated with a race (such as sickle cell anemia); cultural characteristics associated with race, such as one's name, cultural dress, accent, or manner of speech; and an individual's relationship or association with an individual of a particular race.
- L. *Religion* – For purposes of religious discrimination, the term "religion" means all aspects of religious observance and practice, as well as belief. It also includes moral or ethical beliefs as to what is right and wrong that are sincerely held with the strength of traditional religious views.
- M. *Retaliation or Reprisal* – Taking any form of adverse employment action against an individual because he or she filed a complaint of discrimination or served as

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a witness, representative, investigator, or other participant in connection with a complaint of discrimination.

- N. *Sex (Gender) Discrimination* – Occurs when a male or female is treated differently because of his or her gender. Sex discrimination also includes sexual harassment.


VIII. COMPLAINTS OF DISCRIMINATION, HARASSMENT, OR RETALIATION:

The ARRC encourages reporting of all perceived incidents of discrimination, harassment, or retaliation. Individuals who believe they have been the victim of any form of discrimination, harassment, or retaliation may discuss their concerns with anyone in their chain of command, their Union representative (for union members), or the Director of Labor Relations, or they may file a *Complaint of Discrimination*.

The ARRC encourages individuals who believe they are being subjected to harassment to advise the offender(s) promptly that his, her, or their behavior is unwelcome and to request that it stop. This is not, however, a requirement prior to making a complaint, and it is not a substitute for the complaint procedure described above.


A. Complaint Process:

1. Complaints must be filed within 180 calendar days of the alleged incident(s) giving rise to the complaint. Complaints filed outside of this time frame are considered untimely and will not be accepted for review.
2. An individual or applicant for employment (complainant) who believes he or she is being harassed, discriminated or retaliated against may initiate the Complaint Process by filing a written and signed statement with the Director, Labor Relations (Director). The complaint must contain sufficient details to allow the Director to determine if the policy may have been violated. The complainant may be required to complete the ARRC Complaint of Discrimination form.
3. If a complainant needs assistance with the preparation and/or presentation of a discrimination complaint, the complainant may designate a co-worker or a union representative to assist him or her. An applicant for employment may have any non-lawyer individual assist him or her. The representative

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may participate in the complaint process along with the complainant.

4. Within five business days of receipt of a complaint, the Director will notify the applicable vice president (VP) of the complaint.
5. Complaints will be investigated impartially and promptly by the Director. The investigation will include interviews of the complainant, the respondent, and other individuals(s) who may have relevant knowledge. Investigations should be completed within 30 calendar days from receipt of a complaint unless legitimate circumstances necessitate a longer period. The Director will keep the complainant informed of any extra time needed to complete the investigation.
6. Upon conclusion of the investigation, the Director will issue a report of findings which shall include findings, determinations, and recommendations. The Director will meet with the respondent's VP to discuss the report. A copy will be sent to Office of the General Counsel and the Chief Financial Officer. If the Director finds that prohibited conduct has occurred and the conduct constitutes a violation of this Policy, the respondent's VP will take effective and appropriate corrective action. The VP is the responsible authority for determining corrective action but shall confer with the Director and/or the Office of the General Counsel. If the Director finds that prohibited conduct has not occurred, the complainant will be notified and the case will be closed.
7. Corrective action may include discipline up to and including suspension or termination. Corrective action shall be appropriate for the conduct and consistent with this policy. Discipline for non-represented employees must comply with Policy & Procedure 61-1, Corrective Actions and Disciplinary Actions for All ARRC Executive and Key Executive Employees. Discipline for represented employees must comply with the discipline process outlined in the applicable collective bargaining agreement.
8. Disciplinary action which may be taken as a result of an investigation is confidential and shall not be disclosed to another party except on a legitimate need to know basis.
9. Immediately following the meeting with the VP, the Director will issue a notice of findings to the complainant(s) and respondent(s). The notice will

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inform the parties that the investigation has concluded and a report has been submitted to the respondent's VP. The notice will identify the findings, e.g., the alleged conduct constituted a violation of the policy, the alleged conduct did not constitute a violation of the policy. Any party to the complaint may request a meeting with the Director and/or the VP regarding the notice.

10. No adverse action will be taken against an individual for exercising his or her rights under applicable law or for making a good faith complaint or assisting in an investigation under this policy. Any threats or attempts at retaliation must be reported to the Director or Human Resources Director immediately.
11. Complaints of discrimination or harassment and any information received during the course of an investigation and the resolution of an investigation will be kept strictly confidential. Availability of this information will only be to those individuals with a legitimate need to know, as determined by the ARRC, unless required by law to be divulged.
12. All individuals, including the complainant, who are involved in the investigation, are expected to use discretion in maintaining the confidentiality of information and documents generated or discussed during the investigation. This provision does not restrict an individual's ability to exercise his or her rights under applicable law.

B. Complaint Appeal:

1. If the complainant is not satisfied with the findings, the complainant may file appeal to the ARRC's President and CEO (CEO) within 15 calendar days of receipt of the notice of findings.
2. The appeal must be submitted in writing and specify the grounds on which the complainant is appealing the notice of findings.
3. The CEO will issue a written decision within 30 calendar days of receipt of the appeal. The CEO may attempt an informal resolution prior to issuing a written decision. The decision of the CEO shall be final.

Nothing in this policy shall prevent the complainant from pursuing formal legal remedies

	ALASKA RAILROAD Corporation	Subject: ANTI-DISCRIMINATION & HARASSMENT POLICY 62-1	Page 9 of 9
		Approved by: Christopher Aadnesen, President & CEO	Effective Date: 3/13/2013

or resolution through state or federal agencies or the court.

IX. RESPONSIBLE DIVISION/DEPARTMENT:

The Labor Relations Department and Office of the General Counsel are responsible for the periodic review and update of this policy and procedure.

X. APPENDICES AND FORMS

- Appendix A – ARRC Complaint of Discrimination Form
- Appendix B – ARRC Designation of Representative Form



Alaska Railroad Corporation Complaint of Discrimination

(Please Type or Print)

1. Complainant's Name: _____ ARRC Location _____

Home Address: _____

State, Zip Code: _____

Home/Cell Phone: _____ Work Phone: _____

2. Individual who you believe discriminated against you?

Division/Office: _____

ARRC Location: _____

3. You believe this individual discriminated against you on the basis of your: (check all that apply)

age race sex color national origin disability religion pregnancy marital status

change in marital status parenthood; or in retaliation for your having engaged in protected activity.

If your complaint is not based upon one of the above protected classes, you may not have an EEO claim. If that is the case, you should refer to ARRC Policy 64-8, ARRC Policy 61-1, or consult with your union representative, whichever is applicable to you.

4. State the facts regarding the specific incident(s) of discrimination that you are claiming, including the date of the incident and the exact way in which you believe you were discriminated against.

5. Have you discussed your complaint with a manager or supervisor? Yes ___ No ___ If yes, with whom and when?

Name: _____ Date _____

6. Have you filed a complaint about this incident with an outside agency (Alaska Human Rights Commission, EEOC, etc.)?

No _____ Yes _____ If yes, which agency? _____

7. Complainant's Signature:

_____ Date _____

Note: The complainant must sign this complaint personally.

For ARRC Use Only:

Date Received:

**ALASKA RAILROAD CORPORATION
COMPLAINT OF DISCRIMINATION
DESIGNATION OF NON-LAWYER REPRESENTATIVE**

I, _____, hereby designate _____, to
(Complainant) (Printed Name/Title of Representative)

Act as my Representative in the matter(s) pertaining to my complaint of discrimination filed with the Alaska Railroad Corporation on the date below. Even though I have a designated representative, I understand it is still my responsibility to cooperatively participate in the investigation of my complaint.

I understand that the authority and responsibilities granted to the above-named individual, by virtue of this designation, may be terminated by me at any time. Should this occur, I will notify the Director of Labor Relations in writing of my decision.

Check one and complete as appropriate:

1. By designating the individual named above as my representative, I understand that all official correspondence will be sent to my representative with copies to me.

Check the preferred method of contact:

Telephone No (w/ area code): _____

Email address: _____

Mailing address: _____

2. I am requesting that all correspondence be sent to:

Check the preferred method of contact:

Individual Name _____

Email address: _____

Mailing address: _____

Complainant Signature: _____ Date: _____

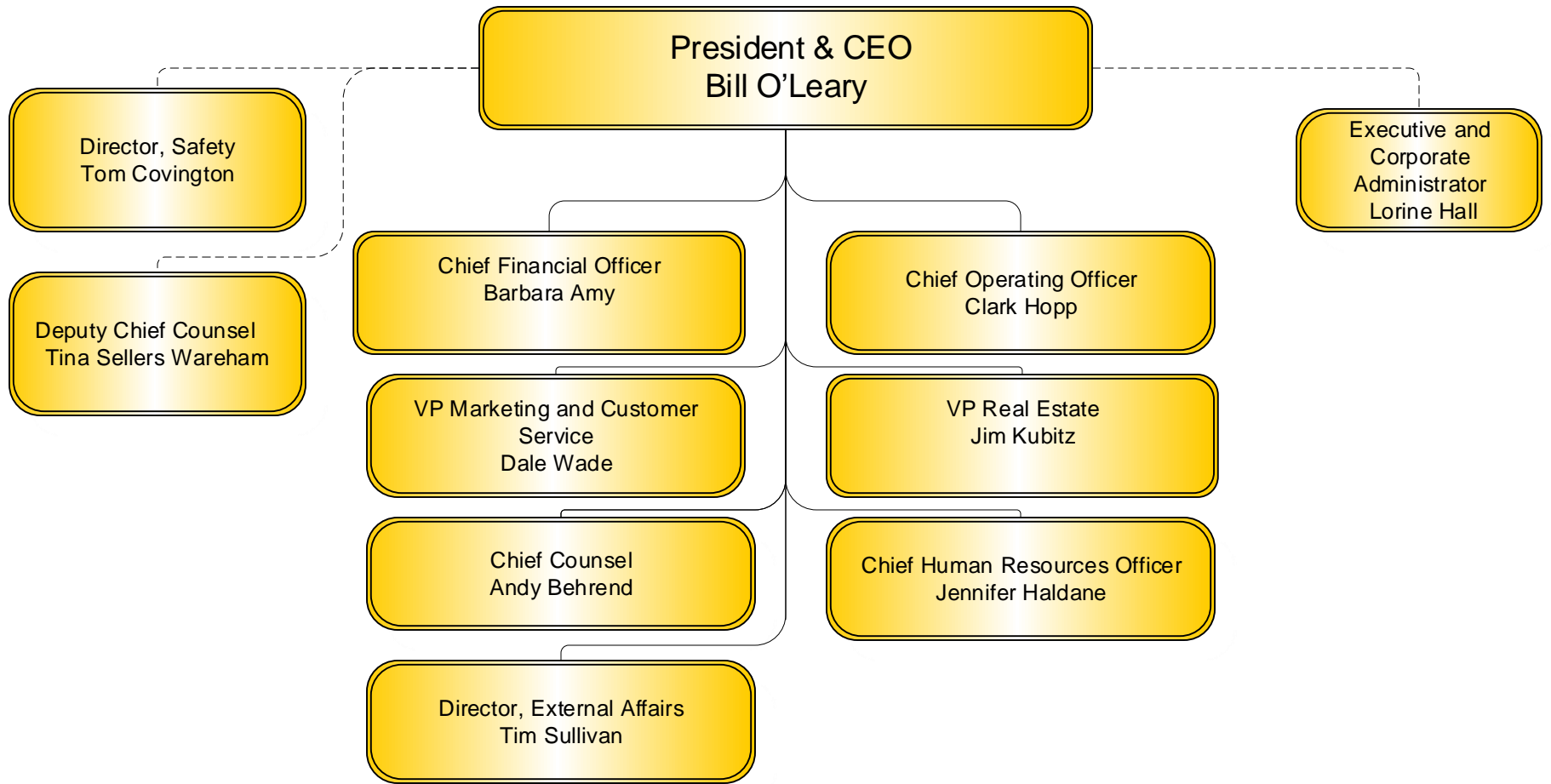
Printed Name: _____

ARRC EEO Plan

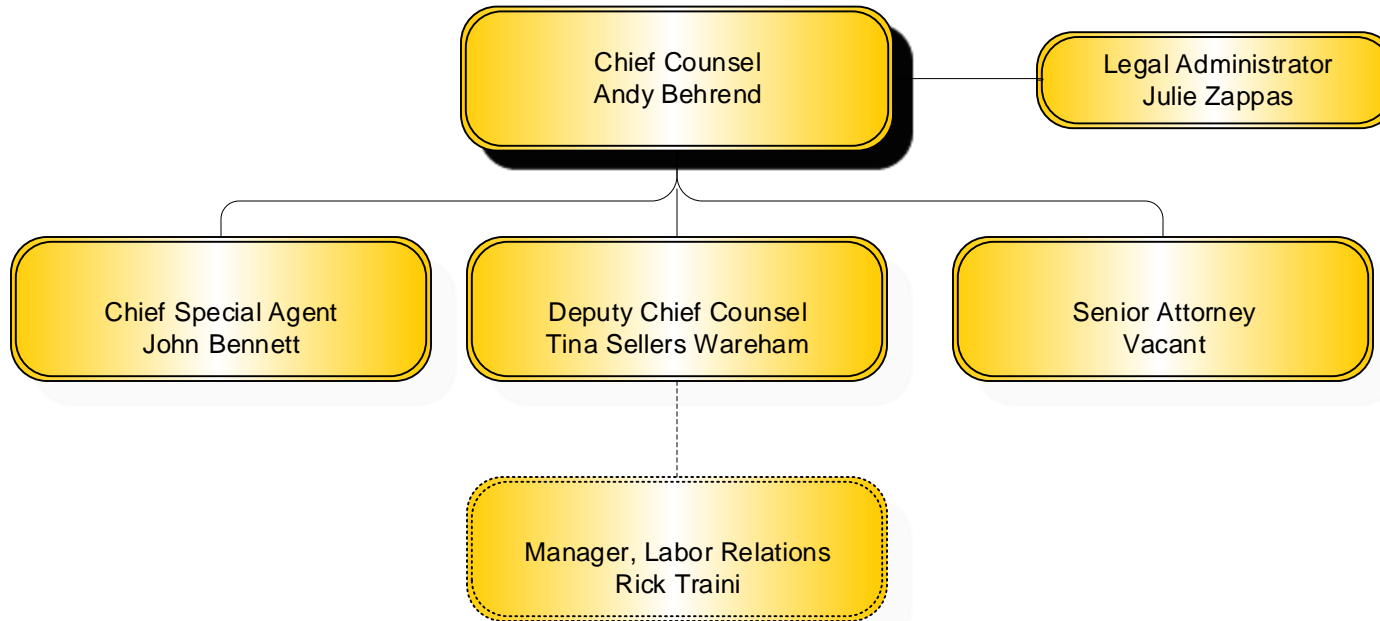
Attachment B

Relevant Portion of Organization Chart

Alaska Railroad Corporation
Executive Staff
January 6, 2020



Alaska Railroad Corporation
Legal Department
January 6, 2020



ARRC EEO Plan

Attachment C

Employment Practices Charts

Number by Race and Sex Who Were Offered Position and Those Who Declined Offer

	2016		2016 Total	2017		2017 Total	2018		2018 Total	2019		2019 Total	Grand Total
	Accepted	Declined		Accepted	Declined		Accepted	Declined		Accepted	Declined		
Female	43	3	46	17	1	18	25	9	34	38	5	43	141
Alaska Native	1		1	1		1							2
American Indian							1		1	1	1	2	3
Asian	3		3				6	2	8	4		4	15
Black				1		1	1		1	2		2	4
Hispanic	1		1				1	2	3	3	2	5	9
Unknown	2		2							2	2	4	6
White	36	3	39	15	1	16	16	5	21	26		26	102
Male	87	10	97	63	5	68	81	15	96	38	5	43	304
Alaska Native	2		2	1		1	1		1				4
American Indian		1	1	1	1	2	2		2	1	1	2	7
Asian	4		4	3		3	1	2	3	4		4	14
Black	4		4	4		4	4	1	5	2		2	15
Hispanic	3		3	6		6	6		6	3	2	5	20
Unknown	2		2	1	1	2	2		2	2		2	8
White	72	9	81	47	3	50	65	12	77	26	2	28	236
Grand Total	130	13	143	80	6	86	106	24	130	76	10	172	531

2016 = July 2015 to June 2016

2017 = July 2016 to June 2017

2018 = July 2017 to June 2018

2019 = July 2018 to June 2019

**Four-Fifths Adverse Impact Analysis by Job Category
Hires**

Job Category (Use EEO-4)	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
1 - Officials & Administrators																
Number Applied	178	60	145	53	16	1	7	1	6	3	4	2	-	-	-	-
Total Hires	19	6	17	6	-	-	1	-	-	-	1	-	-	-	-	-
Selection Rate	10.7%	10.0%	11.7%	11.3%	0.0%	N/A	14.3%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	93.7%	82.1%	79.2%	0.0%	N/A	100.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	Yes	Yes	N/A	No	N/A	Yes	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2 - Professionals																
Number Applied	179	50	149	43	4	1	3	4	7	-	16	2	-	-	-	-
Total Hires	11	10	10	10	-	-	-	-	-	-	1	-	-	-	-	-
Selection Rate	6.1%	20.0%	6.7%	23.3%	N/A	N/A	N/A	N/A	0.0%	N/A	6.3%	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	30.7%	100.0%	28.9%	100.0%	N/A	N/A	N/A	N/A	0.0%	N/A	26.9%	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	Yes	No	Yes	No	N/A	N/A	N/A	N/A	Yes	N/A	Yes	N/A	N/A	N/A	N/A	N/A
3 - Technicians																
Number Applied	155	39	117	27	5	2	9	3	13	2	11	5	-	-	-	-
Total Hires	16	4	11	3	-	-	1	1	2	-	2	-	-	-	-	-
Selection Rate	10.3%	10.3%	9.4%	11.1%	0.0%	N/A	11.1%	N/A	15.4%	N/A	18.2%	0.0%	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	99.4%	51.7%	61.1%	0.0%	N/A	61.1%	N/A	84.6%	N/A	100.0%	0.0%	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	Yes	Yes	Yes	N/A	Yes	N/A	No	N/A	No	Yes	N/A	N/A	N/A	N/A
4 - Protective Service																
Number Applied	22	1	16	1	-	-	2	-	2	-	2	-	-	-	-	-
Total Hires	3	-	2	-	-	-	-	-	1	-	-	-	-	-	-	-
Selection Rate	13.6%	0.0%	12.5%	0.0%	N/A	N/A	0.0%	N/A	50.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	NA	25.0%	0.0%	N/A	N/A	0.0%	N/A	100.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	Yes	Yes	N/A	N/A	Yes	N/A	No	N/A	Yes	N/A	N/A	N/A	N/A	N/A
5 - Paraprofessional																
Number Applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Hires	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
6 - Administrative Support																
Number Applied	19	50	13	36	2	3	3	1	1	2	-	8	-	-	-	-
Total Hires	2	9	2	4	-	1	-	-	-	-	-	4	-	-	-	-
Selection Rate	10.5%	18.0%	15.4%	11.1%	0.0%	33.3%	0.0%	N/A	N/A	0.0%	N/A	50.0%	N/A	N/A	N/A	N/A
Ratio to Highest Rate	58.5%	100.0%	30.8%	22.2%	0.0%	66.7%	0.0%	N/A	N/A	0.0%	N/A	100.0%	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	Yes	No	Yes	Yes	Yes	Yes	Yes	N/A	N/A	Yes	N/A	No	N/A	N/A	N/A	N/A
7 - Skilled Craft																
Number Applied	532	16	434	14	41	1	15	-	29	-	13	1	-	-	-	-
Total Hires	54	3	48	2	1	-	1	-	4	-	-	1	-	-	-	-
Selection Rate	10.2%	18.8%	11.1%	14.3%	2.4%	N/A	6.7%	N/A	13.8%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	54.1%	100.0%	77.4%	100.0%	17.1%	N/A	46.7%	N/A	96.6%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	Yes	No	Yes	No	Yes	N/A	Yes	N/A	No	N/A	Yes	N/A	N/A	N/A	N/A	N/A
8 - Service-Maintenance																
Number Applied	890	321	661	216	63	30	59	14	50	23	57	38	-	-	-	-
Total Hires	119	50	92	40	6	2	9	1	8	2	4	5	-	-	-	-
Selection Rate	13.4%	15.6%	13.9%	18.5%	9.5%	6.7%	15.3%	N/A	16.0%	N/A	7.0%	13.2%	N/A	N/A	N/A	N/A

**Four-Fifths Adverse Impact Analysis by Job Category
Hires**

Job Category (Use EEO-4)	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Ratio to Highest Rate	85.8%	100.0%	75.2%	100.0%	51.4%	36.0%	82.4%	N/A	86.4%	N/A	37.9%	71.1%	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	Yes	No	Yes	Yes	No	N/A	No	N/A	Yes	Yes	N/A	N/A	N/A	N/A

Notes:

Persons with Disabilities	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Number Applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Hires	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Veterans	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Number Applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Hires	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Notes:

**Four-Fifths Adverse Impact Analysis by Job Category
Promotions**

Job Category (Use EEO-4)	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
1 - Officials & Administrators																
Number Applied	86	16	69	13	11	1	1	-	2	2	3	-	-	-	-	-
Total Promotions	24	5	20	5	-	-	1	-	2	-	1	-	-	-	-	-
Selection Rate	27.9%	31.3%	29.0%	38.5%	0.0%	N/A	N/A	N/A	N/A	N/A	33.3%	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	89.3%	100.0%	75.4%	100.0%	0.0%	N/A	N/A	N/A	N/A	N/A	86.7%	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	Yes	No	Yes	N/A	N/A	N/A	N/A	N/A	No	N/A	N/A	N/A	N/A	N/A
2 - Professionals																
Number Applied	11	-	10	-	-	-	-	-	1	-	-	-	-	-	-	-
Total Promotions	3	-	3	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	27.3%	N/A	30.0%	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	N/A	No	N/A	N/A	N/A	N/A	N/A	Yes	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3 - Technicians																
Number Applied	72	12	62	7	-	-	3	-	7	2	-	3	-	-	-	-
Total Promotions	3	-	2	-	-	-	-	-	1	-	-	-	-	-	-	-
Selection Rate	4.2%	0.0%	3.2%	0.0%	N/A	N/A	0.0%	N/A	14.3%	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	NA	22.6%	0.0%	N/A	N/A	0.0%	N/A	100.0%	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	Yes	Yes	N/A	N/A	Yes	N/A	No	Yes	N/A	Yes	N/A	N/A	N/A	N/A
4 - Protective Service																
Number Applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Promotions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
5 - Paraprofessional																
Number Applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Promotions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
6 - Administrative Support																
Number Applied	34	57	9	40	1	9	3	4	-	1	6	3	15	-	-	-
Total Promotions	4	19	4	14	-	-	-	-	-	1	-	3	-	1	-	-
Selection Rate	11.8%	33.3%	44.4%	35.0%	N/A	0.0%	0.0%	0.0%	N/A	N/A	0.0%	100.0%	0.0%	N/A	N/A	N/A
Ratio to Highest Rate	35.3%	100.0%	44.4%	35.0%	N/A	0.0%	0.0%	0.0%	N/A	N/A	0.0%	100.0%	0.0%	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	Yes	No	Yes	Yes	N/A	Yes	Yes	Yes	N/A	N/A	Yes	No	Yes	N/A	N/A	N/A
7 - Skilled Craft																
Number Applied	26	-	24	-	1	-	-	-	-	-	1	-	-	-	-	-
Total Promotions	57	1	49	1	2	-	3	-	2	-	-	-	-	-	1	-
Selection Rate	219.2%	N/A	204.2%	N/A	200.0%	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	N/A	100.0%	N/A	98.0%	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A	Yes	N/A	N/A	N/A	N/A	N/A
8 - Service-Maintenance																
Number Applied	317	20	239	17	28	2	17	-	24	-	9	1	-	-	-	-
Total Promotions	32	2	23	1	3	-	1	-	3	1	2	-	-	-	-	-
Selection Rate	10.1%	10.0%	9.6%	5.9%	10.7%	N/A	5.9%	N/A	12.5%	N/A	22.2%	N/A	N/A	N/A	N/A	N/A

**Four-Fifths Adverse Impact Analysis by Job Category
Promotions**

Job Category (Use EEO-4)	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Ratio to Highest Rate	100.0%	99.1%	43.3%	26.5%	48.2%	N/A	26.5%	N/A	56.3%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	Yes	Yes	Yes	N/A	Yes	N/A	Yes	N/A	No	N/A	N/A	N/A	N/A	N/A

Notes:

Persons with Disabilities	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Number Applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Promotions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Veterans	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Number Applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Promotions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Notes:

**Four-Fifths Adverse Impact Analysis by Job Category
Terminations**

Job Category (Use EEO-4)	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
1 - Officials & Administrators																
Total Workforce	118	41	107	38		2	4		4	1	1		1	-	1	-
Total Involuntary Terminations	8	5	8	4		1	-	-	-	-	-	-	-	-	-	-
Involuntary Termination Rate	6.8%	12.2%	7.5%	10.5%	N/A	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	55.6%	0.0%	0.0%	N/A	N/A	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2 - Professionals																
Total Workforce	10	9	10	7			-	-	-	-	-	1	-	-	-	1
Total Involuntary Terminations	2	-	2				-	-	-	-	-	-	-	-	-	-
Involuntary Termination Rate	20.0%	0.0%	20.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A	N/A	0.0%
Ratio to Lowest Rate	0.0%	100.0%	0.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A	N/A	100.0%
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	No	N/A	N/A	N/A	No
3 - Technicians																
Total Workforce	18	5	16	5	1		-	-	-	-	-	-	-	-	1	-
Total Involuntary Terminations	2	-	1				-	-	1	-	-	-	-	-	-	-
Involuntary Termination Rate	11.1%	0.0%	6.3%	0.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.0%	N/A
Ratio to Lowest Rate	0.0%	100.0%	0.0%	100.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.0%	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	No	N/A
4 - Protective Service																
Total Workforce	3	-	2				-	-	1	-	-	-	-	-	-	-
Total Involuntary Terminations	-	-					-	-	-	-	-	-	-	-	-	-
Involuntary Termination Rate	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	N/A	No	N/A	N/A	N/A	N/A	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A

**Four-Fifths Adverse Impact Analysis by Job Category
Terminations**

Job Category (Use EEO-4)	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
5 - Paraprofessional																
Total Workforce	-	-					-	-	-	-	-	-	-	-	-	-
Total Involuntary Terminations	-	-					-	-	-	-	-	-	-	-	-	-
Involuntary Termination Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
6 - Administrative Support																
Total Workforce	10	57	9	37		2	-	4	-	5	-	8	1	1	-	-
Total Involuntary Terminations	3	3		3	1		2	-	-	-	-	-	-	-	-	-
Involuntary Termination Rate	30.0%	5.3%	0.0%	8.1%	N/A	0.0%	N/A	0.0%	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	17.5%	100.0%	100.0%	0.0%	N/A	100.0%	N/A	100.0%	N/A	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	Yes	No	No	No	N/A	No	N/A	No	N/A	No	N/A	No	N/A	N/A	N/A	N/A
7 - Skilled Craft																
Total Workforce	160	3	140	3	7		3	-	1	-	1	-	3	-	5	-
Total Involuntary Terminations	16	1	12	1	3		1	-	-	-	-	-	-	-	-	-
Involuntary Termination Rate	10.0%	33.3%	8.6%	N/A	42.9%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.0%	N/A
Ratio to Lowest Rate	100.0%	30.0%	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.0%	N/A
Potential Adverse Impact (Yes/No)	No	Yes	No	N/A	Yes	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	No	N/A
8 - Service-Maintenance																
Total Workforce	247	27	211	18	7	1	9	2	8	4	6	-	1	-	5	2
Total Involuntary Terminations	25	-	19		1		3	-	2	-	-	-	-	-	-	-
Involuntary Termination Rate	10.1%	0.0%	9.0%	0.0%	14.3%	N/A	33.3%	N/A	25.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	0.0%	100.0%	0.0%	100.0%	0.0%	N/A	0.0%	N/A	0.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	No	N/A	Yes	N/A	Yes	N/A	No	N/A	N/A	N/A	N/A	N/A

Notes:

Discipline Rate	0.0%	0.0%	0.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.0%	N/A
Ratio to Lowest Rate	100.0%	100.0%	100.0%	100.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.0%	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	No	N/A
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	0.0%	0.0%	0.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.0%	N/A
Ratio to Lowest Rate	100.0%	100.0%	100.0%	100.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.0%	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	No	N/A
4 - Protective Service																
Total Workforce	3	-	2	-	-	-	-	-	1	-	-	-	-	-	-	-
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	N/A	No	N/A	N/A	N/A	N/A	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	N/A	No	N/A	N/A	N/A	N/A	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	N/A	No	N/A	N/A	N/A	N/A	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	N/A	No	N/A	N/A	N/A	N/A	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	N/A	No	N/A	N/A	N/A	N/A	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5 - Paraprofessional																
Total Workforce	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6 - Administrative Support																
Total Workforce	10	57	9	37	-	2	-	4	-	5	-	8	1	1	-	-
Letter of Reprimand	2	3	2	3	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	20.0%	5.3%	22.2%	8.1%	N/A	0.0%	N/A	0.0%	N/A	0.0%	N/A	0.0%	N/A	0.0%	N/A	N/A
Ratio to Lowest Rate	26.3%	100.0%	0.0%	0.0%	N/A	100.0%	N/A	100.0%	N/A	100.0%	N/A	100.0%	N/A	100.0%	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	Yes	No	N/A	No	N/A	No	N/A	No	N/A	No	N/A	No	N/A	N/A
Notice of Oral Warning	4	5	1	3	-	-	1	-	-	2	2	-	-	-	-	-
Discipline Rate	40.0%	8.8%	11.1%	8.1%	N/A	0.0%	N/A	0.0%	N/A	40.0%	N/A	0.0%	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	21.9%	100.0%	0.0%	0.0%	N/A	100.0%	N/A	100.0%	N/A	0.0%	N/A	100.0%	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	Yes	No	No	No	N/A	No	N/A	No	N/A	Yes	N/A	No	N/A	N/A	N/A	N/A
Probationary Termination	3	-	-	-	1	-	2	-	-	-	-	-	-	-	-	-
Discipline Rate	30.0%	0.0%	0.0%	0.0%	N/A	0.0%	N/A	0.0%	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	0.0%	100.0%	100.0%	100.0%	N/A	100.0%	N/A	100.0%	N/A	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A

Potential Adverse Impact (Yes/No)	Yes	No	No	No	N/A	No	N/A	No	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A
Suspension	-	4		3	-	-	-	-	-	1	-	-	-	-	-	-	-
Discipline Rate	0.0%	7.0%	0.0%	8.1%	N/A	0.0%	N/A	0.0%	N/A	20.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	0.0%	100.0%	0.0%	N/A	100.0%	N/A	100.0%	N/A	0.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	No	N/A	No	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A
<Enter Discipline Type>	-	-			-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	0.0%	0.0%	0.0%	0.0%	N/A	0.0%	N/A	0.0%	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	100.0%	100.0%	100.0%	N/A	100.0%	N/A	100.0%	N/A	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	No	N/A	No	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A
<Enter Discipline Type>	-	-			-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	0.0%	0.0%	0.0%	0.0%	N/A	0.0%	N/A	0.0%	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	100.0%	100.0%	100.0%	N/A	100.0%	N/A	100.0%	N/A	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	No	N/A	No	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A
7 - Skilled Craft																	
Total Workforce	160	3	140	3	7		3	-	1	-	1	-	3	-	5	-	-
Letter of Reprimand	28	1	26	1	1		1	-	-	-	-	-	-	-	-	-	-
Discipline Rate	17.5%	33.3%	18.6%	N/A	14.3%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A
Ratio to Lowest Rate	100.0%	52.5%	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	No	N/A	N/A
Notice of Oral Warning	38	1	29	1	7		-	-	-	-	-	-	-	-	2	-	-
Discipline Rate	23.8%	33.3%	20.7%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	40.0%	N/A	N/A
Ratio to Lowest Rate	100.0%	71.3%	100.0%	N/A	20.7%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	51.8%	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	N/A	Yes	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Yes	N/A	N/A
Probationary Termination	2	1	1	1	-	-	1	-	-	-	-	-	-	-	-	-	-
Discipline Rate	1.3%	33.3%	0.7%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A
Ratio to Lowest Rate	100.0%	3.8%	0.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A
Potential Adverse Impact (Yes/No)	No	Yes	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	No	N/A	N/A
Suspension	16	-	15		1	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	10.0%	0.0%	10.7%	N/A	14.3%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A
Ratio to Lowest Rate	0.0%	100.0%	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	No	N/A	N/A
Termination	13	-	11		2	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	8.1%	0.0%	7.9%	N/A	28.6%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A
Ratio to Lowest Rate	0.0%	100.0%	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	N/A	Yes	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	No	N/A	N/A
<Enter Discipline Type>	-	-			-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	0.0%	0.0%	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A
Ratio to Lowest Rate	100.0%	100.0%	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	No	N/A	N/A
8 -Service-Maintenance																	
Total Workforce	247	27	211	18	7	1	9	2	8	4	6	-	1	-	5	2	-
Certification Revoked	10	-	9		1	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	4.0%	0.0%	4.3%	0.0%	14.3%	N/A	0.0%	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	0.0%	100.0%	0.0%	100.0%	0.0%	N/A	100.0%	N/A	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	No	N/A	No	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A
Letter of Reprimand	49	1	36		4	-	3	1	2	-	2	-	1	-	1	-	-
Discipline Rate	19.8%	3.7%	17.1%	0.0%	57.1%	N/A	33.3%	N/A	25.0%	N/A	33.3%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	18.7%	100.0%	0.0%	100.0%	0.0%	N/A	0.0%	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	Yes	N/A	Yes	N/A	Yes	N/A	Yes	N/A	N/A	N/A	N/A	N/A	N/A
Notice of Oral Warning	108	7	84	5	6		11	1	4	1	2	-	-	-	1	-	-
Discipline Rate	43.7%	25.9%	39.8%	27.8%	85.7%	N/A	122.2%	N/A	50.0%	N/A	33.3%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	59.3%	100.0%	69.8%	100.0%	32.4%	N/A	22.7%	N/A	55.6%	N/A	83.3%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	Yes	No	No	No	Yes	N/A	Yes	N/A	Yes	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A
Suspension	32	2	29	2	1	-	1	-	1	-	-	-	-	-	-	-	-
Discipline Rate	13.0%	7.4%	13.7%	11.1%	14.3%	N/A	11.1%	N/A	12.5%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	57.2%	100.0%	0.0%	0.0%	0.0%	N/A	0.0%	N/A	0.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	No	N/A	No	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A
Termination	9	-	6		1	-	2	-	-	-	-	-	-	-	-	-	-
Discipline Rate	3.6%	0.0%	2.8%	0.0%	14.3%	N/A	22.2%	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	0.0%	100.0%	0.0%	100.0%	0.0%	N/A	0.0%	N/A	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	No	N/A	Yes	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A
<Enter Discipline Type>	-	-			-	-	-	-	-	-	-	-	-	-	-	-	-
Discipline Rate	0.0%	0.0%	0.0%	0.0%	0.0%	N/A	0.0%	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	100.0%	100.0%	100.0%	100.0%	N/A	100.0%	N/A	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	No	N/A	No	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A

Notes:

**Four-Fifths Adverse Impact Analysis by Job Category
Hires**

Job Category (Use EEO-4)	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
1 - Officials & Administrators																
Number Applied	109	57	95	47	7	6	4	2	3	2	-	-	-	-	-	-
Total Hires	19	7	18	6	1	1	-	-	-	-	-	-	-	-	-	-
Selection Rate	17.4%	12.3%	18.9%	12.8%	14.3%	16.7%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	70.5%	100.0%	67.4%	75.4%	88.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	Yes	No	Yes	Yes	No	Yes	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2 - Professionals																
Number Applied	40	16	32	13	4	1	1	1	1	1	2	-	-	-	-	-
Total Hires	3	3	3	3	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	7.5%	18.8%	9.4%	23.1%	0.0%	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	40.0%	100.0%	40.6%	100.0%	0.0%	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	Yes	No	Yes	No	Yes	N/A	N/A	N/A	N/A	N/A	Yes	N/A	N/A	N/A	N/A	N/A
3 - Technicians																
Number Applied	67	15	53	8	2	-	2	1	3	-	7	6	-	-	-	-
Total Hires	11	-	9	-	1	-	-	-	-	-	1	-	-	-	-	-
Selection Rate	16.4%	0.0%	17.0%	0.0%	50.0%	N/A	0.0%	N/A	0.0%	N/A	14.3%	0.0%	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	NA	34.0%	0.0%	100.0%	N/A	0.0%	N/A	0.0%	N/A	28.6%	0.0%	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	Yes	Yes	No	N/A	Yes	N/A	Yes	N/A	Yes	Yes	N/A	N/A	N/A	N/A
4 - Protective Service																
Number Applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Hires	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
5 - Paraprofessional																
Number Applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Hires	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
6 - Administrative Support																
Number Applied	23	86	17	51	3	6	-	6	2	5	1	18	-	-	-	-
Total Hires	3	20	3	14	-	-	-	1	-	1	-	4	-	-	-	-
Selection Rate	13.0%	23.3%	17.6%	27.5%	0.0%	0.0%	N/A	16.7%	N/A	20.0%	N/A	22.2%	N/A	N/A	N/A	N/A
Ratio to Highest Rate	56.1%	100.0%	64.3%	100.0%	0.0%	0.0%	N/A	60.7%	N/A	72.9%	N/A	81.0%	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	Yes	No	Yes	No	Yes	Yes	N/A	Yes	N/A	Yes	N/A	No	N/A	N/A	N/A	N/A
7 - Skilled Craft																
Number Applied	39	1	30	1	4	-	-	-	4	-	1	-	-	-	-	-
Total Hires	6	-	4	-	1	-	-	-	1	-	-	-	-	-	-	-
Selection Rate	15.4%	0.0%	13.3%	0.0%	25.0%	N/A	N/A	N/A	25.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	NA	53.3%	0.0%	100.0%	N/A	N/A	N/A	100.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	Yes	Yes	No	N/A	N/A	N/A	No	N/A	Yes	N/A	N/A	N/A	N/A	N/A
8 - Service-Maintenance																
Number Applied	342	40	253	23	22	4	24	6	24	5	19	2	-	-	-	-
Total Hires	61	6	49	3	2	-	2	1	3	2	5	-	-	-	-	-
Selection Rate	17.8%	15.0%	19.4%	13.0%	9.1%	N/A	8.3%	N/A	12.5%	N/A	26.3%	N/A	N/A	N/A	N/A	N/A

**Four-Fifths Adverse Impact Analysis by Job Category
Hires**

Job Category (Use EEO-4)	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Ratio to Highest Rate	100.0%	84.1%	73.6%	49.6%	34.5%	N/A	31.7%	N/A	47.5%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	Yes	Yes	Yes	N/A	Yes	N/A	Yes	N/A	No	N/A	N/A	N/A	N/A	N/A

Notes:

Persons with Disabilities	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Number Applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Hires	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Veterans	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Number Applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Hires	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Notes:

**Four-Fifths Adverse Impact Analysis by Job Category
Promotions**

Job Category (Use EEO-4)	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Ratio to Highest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Notes:

Persons with Disabilities	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Number Applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Promotions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Veterans	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Number Applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Promotions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Notes:

**Four-Fifths Adverse Impact Analysis by Job Category
Terminations**

Job Category (Use EEO-4)	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
1 - Officials & Administrators																
Total Workforce	128	43	105	35	1	3	4	-	4	1	1	-	1	-	12	4
Total Involuntary Terminations	3	3	3	3	-	-	-	-	-	-	-	-	-	-	-	-
Involuntary Termination Rate	2.3%	7.0%	2.9%	8.6%	N/A	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	0.0%	0.0%
Ratio to Lowest Rate	100.0%	33.6%	0.0%	0.0%	N/A	N/A	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	100.0%	100.0%
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A	No	No
2 - Professionals																
Total Workforce	11	9	11	7	-	-	-	-	-	-	-	1	-	-	-	1
Total Involuntary Terminations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Involuntary Termination Rate	0.0%	0.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A	N/A	0.0%
Ratio to Lowest Rate	100.0%	100.0%	100.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A	N/A	100.0%
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	No	N/A	N/A	N/A	No
3 - Technicians																
Total Workforce	23	3	18	3	2	-	-	-	1	-	-	-	-	-	2	-
Total Involuntary Terminations	2	-	2	-	-	-	-	-	-	-	-	-	-	-	-	-
Involuntary Termination Rate	8.7%	0.0%	11.1%	0.0%	0.0%	N/A	N/A	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	0.0%	N/A
Ratio to Lowest Rate	0.0%	100.0%	0.0%	100.0%	100.0%	N/A	N/A	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	100.0%	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	No	N/A	N/A	N/A	No	N/A	N/A	N/A	N/A	N/A	No	N/A
4 - Protective Service																
Total Workforce	3	-	2	-	-	-	-	-	1	-	-	-	-	-	-	-
Total Involuntary Terminations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Involuntary Termination Rate	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	N/A	No	N/A	N/A	N/A	N/A	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A
5 - Paraprofessional																
Total Workforce	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Involuntary Terminations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Involuntary Termination Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
6 - Administrative Support																
Total Workforce	11	54	10	39	1	-	3	-	3	-	7	1	-	-	-	1
Total Involuntary Terminations	-	1	1	1	-	-	-	-	-	-	-	-	-	-	-	-
Involuntary Termination Rate	0.0%	1.9%	0.0%	2.6%	N/A	N/A	N/A	0.0%	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A
Ratio to Lowest Rate	100.0%	0.0%	100.0%	0.0%	N/A	N/A	N/A	100.0%	N/A	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	N/A	No	N/A	No	N/A	No	N/A	N/A	N/A	N/A
7 - Skilled Craft																
Total Workforce	164	3	144	3	6	-	3	-	2	-	1	-	3	-	5	-
Total Involuntary Terminations	1	-	1	-	-	-	-	-	-	-	-	-	-	-	-	-
Involuntary Termination Rate	0.6%	0.0%	0.7%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.0%	N/A
Ratio to Lowest Rate	0.0%	100.0%	0.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.0%	N/A
Potential Adverse Impact (Yes/No)	No	No	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	No	N/A
8 - Service-Maintenance																
Total Workforce	247	28	204	18	8	1	11	3	6	5	8	-	3	-	7	1
Total Involuntary Terminations	10	12	10	8	1	-	1	-	2	-	-	-	-	-	-	-

**Four-Fifths Adverse Impact Analysis by Job Category
Terminations**

Job Category (Use EEO-4)	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Involuntary Termination Rate	4.0%	42.9%	4.9%	44.4%	0.0%	N/A	0.0%	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	0.0%	N/A
Ratio to Lowest Rate	100.0%	9.4%	0.0%	0.0%	100.0%	N/A	100.0%	N/A	100.0%	N/A	100.0%	N/A	N/A	N/A	100.0%	N/A
Potential Adverse Impact (Yes/No)	No	Yes	No	Yes	No	N/A	No	N/A	No	N/A	No	N/A	N/A	N/A	No	N/A

Notes:

<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	←--Entry	
Discipline Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Ratio to Lowest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	←--Entry
Discipline Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Ratio to Lowest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	←--Entry
Discipline Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Ratio to Lowest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
6 - Administrative Support																			
Total Workforce	11	54	10	39			1	-	3	-	3	-	7	1	-	-	-	1	←--Entry
Notice of Warning	-	3		3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	←--Entry
Discipline Rate	0.0%	5.6%	0.0%	7.7%	N/A	N/A	N/A	0.0%	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	
Ratio to Lowest Rate	100.0%	0.0%	100.0%	0.0%	N/A	N/A	N/A	100.0%	N/A	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	N/A	No	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	
Probationary Termination	-	1		1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	←--Entry
Discipline Rate	0.0%	1.9%	0.0%	2.6%	N/A	N/A	N/A	0.0%	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	
Ratio to Lowest Rate	100.0%	0.0%	100.0%	0.0%	N/A	N/A	N/A	100.0%	N/A	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	N/A	No	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	
Suspension	-	1		1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	←--Entry
Discipline Rate	0.0%	1.9%	0.0%	2.6%	N/A	N/A	N/A	0.0%	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	
Ratio to Lowest Rate	100.0%	0.0%	100.0%	0.0%	N/A	N/A	N/A	100.0%	N/A	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	N/A	No	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	←--Entry
Discipline Rate	0.0%	0.0%	0.0%	0.0%	N/A	N/A	N/A	0.0%	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	
Ratio to Lowest Rate	100.0%	100.0%	100.0%	100.0%	N/A	N/A	N/A	100.0%	N/A	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	N/A	No	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	←--Entry
Discipline Rate	0.0%	0.0%	0.0%	0.0%	N/A	N/A	N/A	0.0%	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	
Ratio to Lowest Rate	100.0%	100.0%	100.0%	100.0%	N/A	N/A	N/A	100.0%	N/A	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	N/A	No	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	←--Entry
Discipline Rate	0.0%	0.0%	0.0%	0.0%	N/A	N/A	N/A	0.0%	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	
Ratio to Lowest Rate	100.0%	100.0%	100.0%	100.0%	N/A	N/A	N/A	100.0%	N/A	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	N/A	No	N/A	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	
7 - Skilled Craft																			
Total Workforce	164	3	144	3	6		3	-	2	-	1	-	3	-	5	-	-	-	←--Entry
Notice of Warning	7	-	7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	←--Entry
Discipline Rate	4.3%	0.0%	4.9%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A	
Ratio to Lowest Rate	0.0%	100.0%	0.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A	
Potential Adverse Impact (Yes/No)	No	No	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	No	N/A	N/A	
Letter of Reprimand	11	-	11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	←--Entry
Discipline Rate	6.7%	0.0%	7.6%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A	
Ratio to Lowest Rate	0.0%	100.0%	0.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A	
Potential Adverse Impact (Yes/No)	No	No	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	No	N/A	N/A	
Suspension	3	1	2	1	1	-	-	-	-	-	-	-	-	-	-	-	-	-	←--Entry
Discipline Rate	1.8%	33.3%	1.4%	N/A	16.7%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A	
Ratio to Lowest Rate	100.0%	5.5%	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A	
Potential Adverse Impact (Yes/No)	No	Yes	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	No	N/A	N/A	
Termination	2	-	2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	←--Entry
Discipline Rate	1.2%	0.0%	1.4%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A	
Ratio to Lowest Rate	0.0%	100.0%	0.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A	
Potential Adverse Impact (Yes/No)	No	No	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	No	N/A	N/A	
<Enter Discipline Type>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	←--Entry
Discipline Rate	0.0%	0.0%	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A	
Ratio to Lowest Rate	100.0%	100.0%	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A	
Potential Adverse Impact (Yes/No)	No	No	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	No	N/A	N/A	

ARRC EEO Plan

Attachment D

Entities to Which Vacancy Notices are Sent

Entities to Which ARRC Vacancy Notices are Sent

Access Alaska info@accessalaska.org
AHTNA sblue@ahtna.net
Alaska Job Center, Anchorage anchorage.employers@alaska.gov
Alaska Job Center, Fairbanks fairbanks.employers@alaska.gov
Alaska Job Center, Seward seward.jobcenter@alaska.gov
Alaska Village Council Presidents wpete@avcp.org
All Railroad E-Mail users
APU Career Development careerservices@alaskapacific.edu
ARW President arwpresident@arw183.org
ARW Union President contact@arw183.org
Anchorage School District lahn_roberts_sarah@asdk12.org
Assets taylor_evans@assetsinc.org
Assets Inc. jonathon_barnes@assetsinc.org
AssetsInc.Org luke_hobbs@assetsinc.org
Avtec, Seward patti.price@avtec.edu
Calista Corp calista@calistacorp.com
Celia celia.d.espinosa.ctr@mail.mil
Chuck G. charles.gorman@va.gov
Chugach ak.admissions@jobcorps.gov
Chugach staub.brian@jobcorps.org
Delma VET Affairs delma.chapa@alaska.gov
Division of Vocational Rehabilitation barbara_doran@labor.state.ak.us
EAFB Family Support Group jobselmendorf@gci.net
Force rebecca.birch-gutierrez.1@us.af.mil
Job Corps ak.admissions@jobcorps.org
Kenai Peninsula College inklt@uaa.alaska.edu
KPC jwthornton2@kpc.alaska.edu
LDS Employ Center wel-ec-anchorage@ldsmail.net
LDS Employ Center wel-ec-anchorage@ldsmail.net
Marchea Marchea.sovde@va.gov
Martine Robinson martine.robinson@alaska.gov
Massie, Nicole M CTR (US) nicole.m.massie.ctr@mail.mil
Municipality of Anchorage wwer@muni.org
Nine Star sharonpi@ninstar.com
Right.Com Barbara.Konrad@alaska.gov
Sharon Pulou-Isaako sharonpi@ninstar.com
Tony incogitatus@gmail.com
US Dept of Vet Affairs - Theodore Thompson theodore.thompson@va.gov
Vacancy - Teamsters Local 959

Workplace Alaska
Twitter
LinkedIn
UAA Handshake
Craigslist
Glassdoor

Rail Jobs (if applicable)
SHRM Job Bank (if applicable)
Anchorage Daily News
Fairbanks Daily News Miner

**ARRC EEO Plan
Attachment E**

Utilization Analysis Chart

Utilization Analysis by Job Category

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	
1	Job Category	Salary Range (\$XX,000-XX,000)	Total Workforce					Male							Female								
2	Use EEO-4		All	WM	MM	WF	MF	W	AI/AN	B	H/L	A	NHOPI	Multi	W	AI/AN	B	H/L	A	NHOPI	Multi		
3	1 - Officials & Administrators																						
4	Current Workforce	43,000 - 312,000	156	105	12	35	4	105	1	4	4	1	1	1	35	3	-	1	-	-	-	<--Entry	
5	Percent in Category	^Entry		67.3%	7.7%	22.4%	2.6%	67.3%	0.6%	2.6%	2.6%	0.6%	0.6%	0.6%	22.4%	1.9%	0.0%	0.6%	0.0%	0.0%	0.0%	0.0%	
6	Percent of Availability							46.0%	5.3%	1.2%	1.1%	1.4%	0.1%	0.2%	34.5%	5.9%	1.1%	1.3%	1.6%	0.1%	0.2%	<--Entry	
9	Percent Underutilized								5%			1%			12%	4%	1%	1%	2%				
10	Underutilized (Yes/No)								Yes	No	No	Yes	No	No	Yes	Yes	Yes	Yes	Yes	No	No		
11	Number Needed to Reach Parity								7	-	-	1	-	-	18	6	1	1	2	-	-		
12	Planned percent increase Year 1														1%							<--Entry	
13	Planned percent increase Year 2															1%						<--Entry	
14	Planned percent increase Year 3														1%			1%				<--Entry	
15	Planned percent increase Year 4																		1%			<--Entry	
16																							
17	2 - Professionals																						
18	Current Workforce	75,000 - 109,000	20	11	0	7	2	11	-	-	-	-	-	-	7	-	-	-	-	1	-	1	<--Entry
19	Percent in Category	^Entry		55.0%		35.0%	10.0%	55.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	35.0%	0.0%	0.0%	0.0%	5.0%	0.0%	5.0%		
20	Percent of Availability							38.5%	2.6%	1.2%	1.4%	1.5%	0.2%	0.3%	43.2%	5.8%	1.4%	1.9%	1.7%	0.1%	0.2%	<--Entry	
23	Percent Underutilized														8%	6%							
24	Underutilized (Yes/No)								No	No	No	No	No	No	Yes	Yes	No	No	No	No	No		
25	Number Needed to Reach Parity								-	-	-	-	-	-	1	1	-	-	-	-	-		
26	Planned percent increase Year 1																					<--Entry	
27	Planned percent increase Year 2															1%						<--Entry	
28	Planned percent increase Year 3														1%							<--Entry	
29	Planned percent increase Year 4																					<--Entry	
30																							
31	3 - Technicians																						
32	Current Workforce	33,000-187,000	26	18	5	3	0	18	2	-	1	-	-	2	3	-	-	-	-	-	-	<--Entry	
33	Percent in Category	^Entry		69.2%	19.2%	11.5%		69.2%	7.7%	0.0%	3.8%	0.0%	0.0%	7.7%	11.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
34	Percent of Availability							36.9%	4.6%	1.5%	2.7%	3.4%	0.2%	0.1%	34.5%	6.2%	3.0%	3.6%	2.8%	0.3%	0.2%	<--Entry	
37	Percent Underutilized														23%	6%							
38	Underutilized (Yes/No)								No	No	No	No	No	No	Yes	Yes	No	No	No	No	No		
39	Number Needed to Reach Parity								-	-	-	-	-	-	5	1	-	-	-	-	-		
40	Planned percent increase Year 1															1%						<--Entry	
41	Planned percent increase Year 2															1%						<--Entry	
42	Planned percent increase Year 3																1%					<--Entry	
43	Planned percent increase Year 4																					<--Entry	
44																							
45	4 - Protective Service																						
46	Current Workforce	68,000 - 80,000	3	2	1	0	0	2			1											<--Entry	
47	Percent in Category	^Entry		66.7%	33.3%			66.7%	0.0%	0.0%	33.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
48	Percent of Availability							59.1%	13.7%	5.6%	2.7%	2.8%	0.8%	0.3%	11.1%	2.7%	0.1%	0.6%	0.5%	0.0%	0.0%	<--Entry	
51	Percent Underutilized																						
52	Underutilized (Yes/No)								No	No	No	No	No	No	No	No	No	No	No	No	No		
53	Number Needed to Reach Parity								-	-	-	-	-	-	-	-	-	-	-	-	-		
54	Planned percent increase Year 1																					<--Entry	
55	Planned percent increase Year 2																					<--Entry	
56	Planned percent increase Year 3																					<--Entry	
57	Planned percent increase Year 4																					<--Entry	
58																							
59	5 - Paraprofessional																						
60	Current Workforce		0	0	0	0	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	<--Entry	
61	Percent in Category	^Entry						0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
62	Percent of Availability							0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	<--Entry	
65	Percent Underutilized																						
66	Underutilized (Yes/No)								No	No	No	No	No	No	No	No	No	No	No	No	No		
67	Number Needed to Reach Parity								-	-	-	-	-	-	-	-	-	-	-	-	-		
68	Planned percent increase Year 1																					<--Entry	
69	Planned percent increase Year 2																					<--Entry	
70	Planned percent increase Year 3																					<--Entry	
71	Planned percent increase Year 4																					<--Entry	
72																							
73	6 - Administrative Support																						
74	Current Workforce	29,000 - 68,000	66	10	1	39	16	10	-	-	-	-	1	-	39	1	3	3	7	1	1	<--Entry	
75	Percent in Category	^Entry		15.2%	1.5%	59.1%	24.2%	15.2%	0.0%	0.0%	0.0%	0.0%	1.5%	0.0%	59.1%	1.5%	4.5%	4.5%	10.6%	1.5%	1.5%		
76	Percent of Availability							21.7%	3.7%	1.8%	1.8%	2.3%	0.3%	0.4%	44.1%	11.8%	2.6%	3.4%	4.7%	0.6%	0.8%	<--Entry	

ARRC EEO Plan

Attachment F

Goals and Timetables

**ARRC Long and Short Term Goals and Timetables
2016-2018**

EEO Job Category	EEO Group	Short Term Goal (12 months)	Long Term Goal (5 Years)
Officials and Administrators	Minority Male	1 or .68%	3 or 2%
	White Female	2 or 2%	5 or 3.42%
	Minority Female	1 or .68%	3 or 2%
Professionals	Minority Male	1 or 2%	1 or 2%
	Minority Female	1 or 2%	1 or 2%
Technicians	White Female	1 or 4%	3 or 12%
	Minority Female	1 or 4%	2 or 8%
	Minority Male	1 or 4%	1 or 4%
Administrative Support	Minority Male	1 or 1%	1 or 1%
	Minority Female	1 or 1%	3 or 4%
Skilled Craft	Minority Male	1 or .63%	3 or 2%
	White Female	1 or .63%	3 or 2%
	Minority Female	1 or .63%	1 or .63%
Service Maintenance	Minority Male	2 or .63%	5 or 2%
	White Female	2 or .63%	5 or 2%
	Minority Female	2 or .63%	4 or 1.3%

**ARRC Long and Short Term Goals and Timetables
2018 – 2020**

EEO Job Category	EEO Group	Short Term Goal (1 Year)	Long Term Goal (5 Years)
Officials and Administrators	Minority Male	1 or 0.63%	3 or 1.9%
	White Female	2 or 1.3%	5 or 3.2%
	Minority Female	1 or 0.63%	3 or 2%
Professionals	Minority Male	1 or 2%	1 or 2%
	Minority Female	1 or 2%	1 or 2%
Technicians	White Female	1 or 4%	3 or 12%
	Minority Female	1 or 4%	2 or 8%
	Minority Male	1 or 4%	1 or 4%
Administrative Support	Minority Male	1 or 2%	1 or 2%
	Minority Female	1 or 2%	3 or 6%
Skilled Craft	Minority Male	1 or 0.61%	3 or 2%
	White Female	1 or 0.61%	3 or 2%
	Minority Female	1 or 0.61%	1 or 0.61%
Service Maintenance	Minority Male	2 or 0.4%	5 or 2%
	White Female	2 or 0.4%	5 or 2%
	Minority Female	2 or 0.4%	5 or 2%

ARRC EEO Plan

Attachment G

Report on Short-Term Goals 2016-2020

Report on Short Term Goals from 2016-2018

EEO Category	EEO Group	Short Term Goal (1 year)	Goal Met?
Officials and Administrators	Minority Male	1 or 0.68%	Yes
	White Female	2 or 2%	Yes
	Minority Female	1 or 0.68%	No
Professionals	Minority Male	1 or 2%	No
	Minority Female	1 or 2%	No
Technicians	White Female	1 or 4%	Yes
	Minority Female	1 or 4%	No
	Minority Male	1 or 4%	No
Administrative Support	Minority Male	1 or 1%	No
	Minority Female	1 or 1%	Yes
Skilled Craft	Minority Male	2 or 0.63%	Yes
	White Female	2 or 0.63%	Yes
	Minority Female	1 or 0.63%	No
Service Maintenance	Minority Male	2 or 0.63%	No
	White Female	2 or 0.63%	No
	Minority Female	2 or 0.63%	Yes

Since the establishment of its 2016-2018 goals and timetables, the ARRC has experienced a continuing reduction in revenue. From the time of the filing of the last EEO Program in 2015 to date, the ARRC's employee complement has dropped from 764 employees to 708 employees. Much of the reduction can be attributed to normal attrition, but there have also been layoffs and an effort to reduce hiring. Accordingly, it is not surprising that the ARRC has not had the opportunity to meet all of its short term goals.

Report on Short Term Goals from 2018 – 2020

EEO Job Category	EEO Group	Short Term Goal (1 Year)	Goal Met?
Officials and Administrators	Minority Male	1 or 0.63%	Yes
	White Female	2 or 1.3%	Yes
	Minority Female	1 or 0.63%	Yes
Professionals	Minority Male	1 or 2%	No
	Minority Female	1 or 2%	No
Technicians	White Female	1 or 4%	No
	Minority Female	1 or 4%	No
	Minority Male	1 or 4%	Yes
Administrative Support	Minority Male	1 or 2%	No
	Minority Female	1 or 2%	Yes
Skilled Craft	Minority Male	1 or 0.61%	Yes
	White Female	1 or 0.61%	No
	Minority Female	1 or 0.61%	No
Service Maintenance	Minority Male	2 or 0.4%	Yes
	White Female	2 or 0.4%	Yes
	Minority Female	2 or 0.4%	Yes

Alaska employers face consistent challenges with staffing due to the small available labor pool within the area where ARRC can reasonably recruit. Alaska’s recession over the last several years has contributed to increased out-migration of the state’s labor pool. After four reductions in ARRC’s workforce over a 10-year period (the last occurring in 2017), ARRC is now anticipating growth. We are conservatively adding positions back and expanding our hiring outreach efforts accordingly. Despite these challenges, ARRC met several of its short term goals even as the challenges continued to impact the goals for some job categories.

ARRC EEO Plan

Attachment H

Summary of Discrimination Complaints Filed 2016-2020

Alaska Railroad Corporation
Summary of Discrimination Complaints Filed
2016-2020

Race and Physical Disability Discrimination. In late 2015, ARRC terminated an Engineer based upon poor performance. Thereafter, the former employee filed a charge of discrimination with the State of Alaska Human Rights Commission (“Commission”) claiming ARRC had terminated him based upon his physical disability. After a full investigation, the Commission determined there was no evidence to support the former employee’s charge and dismissed the complaint. Shortly after the Commission’s decision, the former employee filed a lawsuit in Anchorage Superior Court alleging ARRC had terminated him based upon his race and physical disability. The parties were able to resolve the lawsuit through mediation, and the case was dismissed with prejudice.

Gender Discrimination. In 2016, ARRC terminated a Terminal Clerk for poor performance during her probationary employment period. Thereafter, she filed a charge of discrimination with the Commission claiming ARRC had terminated her on the basis of gender. The parties were able to resolve the charge before the Commission began its investigation. The complainant withdrew her charge with prejudice.

Race, Religion and Age Discrimination. In 2015, ARRC voluntarily terminated an equipment operator after a lengthy medical leave due to his inability to return to work. Thereafter he filed two charges of employment discrimination with the EEOC against ARRC, one in 2017 and another in 2018. He filed the first charge on behalf of an ARRC trainee who was terminated during his probationary period for poor performance, claiming ARRC had terminated the trainee on the basis of race and religion. He filed the second charge on his own behalf in 2018 alleging ARRC had refused to rehire him on the basis of religion and his age. The EEOC dismissed all charges and closed its investigations in September 2017 and December 2018, finding in both cases it was unable to conclude that the information obtained during its investigations established violations of the applicable statutes.

Over the same general time period, the same former ARRC employee filed a lawsuit in U.S. District Court in Anchorage against ARRC and numerous other defendants (including the EEOC), asserting the same claims of discrimination on behalf of himself and the trainee. The court found he failed to sufficiently plead a claim upon which relief could be granted and dismissed the complaint with prejudice.