2022 EQUAL EMPLOYMENT OPPORTUNITY PROGRAM

DES MOINES AREA REGIONAL TRANSIT AUTHORITY

February 2022

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EQUAL OPPORTUNITY PROGRAM
POLICY STATEMENT

The Des Moines Area Regional Transit Authority (DART) is an Equal Employment Opportunity Employer and is committed to complying with all applicable federal and state laws including the requirements of Federal Transit Administration Circular 4704.1.

DART's Commitment to EEO

In accordance, DART has a strong commitment to the community we serve and our employees. As an equal opportunity employer, we strive 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 sexual orientation, gender identity and pregnancy), age, genetic information, veteran status, or disability or other protected class.

The EEO program is applicable to all employment practices including, but not limited to, recruitment, hiring, selection for training, promotion, transfer, demotion, layoff, termination, rates of pay or other forms of compensation.

All applicants and employees have the right to file complaints alleging discrimination. Retaliation against an individual who files a charge or complaint of 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.

DART 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.

As DART's CEO, I maintain overall responsibility and accountability for DART's compliance with its EEO Policy and Program. To ensure day-to-day management, including program preparation, monitoring, and complaint investigation, I have appointed Todd Sadler, Chief Human Resources and EEO Officer (515-283-5000 or tsadler@ridedart.com) as DART's EEO Officer. Todd Sadler will report directly to me and acts with my authority with all levels of management, labor unions, and employees.

All DART executives, management, and supervisory personnel, however, share in the responsibility for implementing and monitoring DART's EEO Policy and Program within their respective areas and will be assigned specific tasks to ensure compliance is achieved. DART will evaluate its managers' and supervisors' performance on their successful implementation of DART's policies and procedures, in the same way DART assesses their performance regarding other agency goals.

DART is committed to undertaking and developing a written nondiscrimination program that sets forth the policies, practices, and procedures, with goals and timetables, to which the agency is committed and make the EEO Program available for inspection by any employee or applicant for employment upon written request.

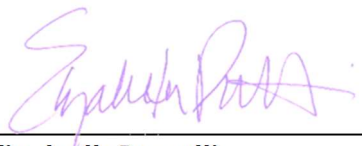
I am personally committed to a workplace that acts upon its daily responsibility to treat all applicants and employees with dignity and respect, as well as equitably under the guidelines of our EEO Policy and Program.

Vendors Contractors and Suppliers

DART requires all contractors, vendors, and suppliers to comply with appropriate federal and state laws, rules, and regulations. This compliance effort includes the submission of an affidavit that the contracting party does not and will not discriminate in its employment practices on the basis of race, color, religion, national origin, sex (including sexual orientation, gender identity and pregnancy), age, genetic information, veteran status, or disability or other protected class.

Conclusion

DART is committed to the EEO Goals outlined in this document with the full belief that the achievement of these goals will lead to the improved utilization of previously underutilized human resources that are currently available in our labor markets.



Elizabeth Presutti
Chief Executive Officer

February 25, 2022
Date

1. DISSEMINATION OF POLICY

DART's Equal Employment Opportunity Policy and Program shall be publicized and disseminated to employees as well as to applicants and the general public. The dissemination of the information will be accomplished as follows:

1.1 Internal Dissemination

- Inclusion of the EEO policy in DART's employee handbooks, operations manuals and collective bargaining agreements.
- Annually, the DART CEO publishing the written policy statement informing all employees of DART's commitment to equal employment opportunity.
- The EEO Officer participates in weekly staff meetings with the HR team managers. Any EEO matters or concerns are discussed at these meetings.
- DART displays EEO Posters and DART's policy statement in conspicuous areas of the facility. The information contained in the posters is also contained in employees' manuals and discussed in employee orientation and training programs, at which time DART encourages all employees to make suggestions in regard to implementing and refining the EEO program.
- DART conducts periodic EEO training for employees and managers; new supervisors and managers must attend training within 90 days of their appointment.

1.2 External Dissemination

- Provide information on DART's EEO policy to all recruitment sources, minority and women's organizations and training organizations.
- Publicize DART as "an equal opportunity employer" in job advertisements.
- Post online at www.ridedart.com/ at the bottom of the home page, linking directly to www.ridedart.com/eeo

2. DESIGNATION OF PERSONNEL

The Des Moines Area Regional Transit Authority's CEO has the overall responsibility for the Equal Employment Opportunity Policy (EEO) and Affirmative Action Plan. To effectively carry out these objectives, the CEO has assigned the EEO Officer's role to the Chief Human Resources Officer, who has the responsibility for developing and implementing the EEO Policy Statement and Affirmative Action Plan. However, should a complaint be filed against the Human Resources Department, the complaint shall be reported to and investigated by the CEO. The following identifies specific accountabilities.

2.1 Role of the Chief Human Resources Officer: The Chief Human Resources Officer, having overall responsibility for the EEO/AA Plan, will coordinate and administer the day-to-day operation of the EEO plan, which includes, but is not limited to:

- The development of policy statements and a written EEO Program.
- Assisting management in collecting and analyzing employment data, identification of problem areas, setting goals and timetables and developing programs to achieve goals.
- Designing, implementing, and monitoring audit and reporting systems that will measure program effectiveness and to determine where progress has been made and where proactive action is needed.
- Reviewing the agency's nondiscrimination plan with all manager and supervisors to ensure that the policy is understood.
- Serving as the liaison between the agency; Federal, State and Local governments; regulatory agencies; and community groups representing minorities, women, and persons with disabilities, and others.
- Concurring in the hiring and promotion process.
- In conjunction with human resources periodically reviewing employment practices policies (e.g., hiring, promotions, training), complaint policies, reasonable accommodation policies, performance evaluations, grievance procedures, and union agreements.
- Investigating complaints of EEO discrimination.
- Reporting at least semiannually to the CEO on each department's progress in relation to the agency's goals and on contractor and vendor compliance.
- Maintaining awareness of current EEO laws and regulations and ensuring the laws and regulations affecting nondiscrimination are disseminated to responsible officials.
- Providing EEO training for employees and managers.
- In conjunction with human resources, advising employees and applicants of available training programs and professional development opportunities and the entrance requirements.
- Auditing postings of the EEO policy statement to ensure compliance information is posted and up to date.

2.2 Role of all Managers and Supervisors: All Managers and Supervisors are responsible for ensuring EEO and must not discriminated based on protected class. These responsibilities include, but are not limited to:

- Participating in periodic audits of all aspects of employment in order to identify and to remove barriers obstructing the achievement of DART's goals and objectives.
- Holding regular discussions with other managers, supervisors and employees to assure DART's policies and procedures are being followed.
- Reviewing the qualifications of and providing career counseling to all employees to assure that minorities, disabled persons, and women are given full opportunity for transfers, promotions, training, salary increases, and other forms of compensation.
- Encouraging employee participation to support the advancement of the EEO Program (e.g., professional development and career growth opportunities, posting promotional opportunities, shadowing, mentoring).
- Cooperating with the EEO Officer in review of information and investigation of complaints.
- In conjunction with the EEO Officer, maintaining and updating the personnel database for generating reports required for the nondiscrimination program.
- In conjunction with the human resources department, providing reasonable accommodations to applicants and employees who need them because of a disability or to practice or observe their religion, absent undue hardship.

3. UTILIZATION ANALYSIS

3.1. Availability Analysis: To determine the composition and availability of the workforce in the Des Moines-West Des Moines, IA Metro, the most recent data available from census.gov was used. The table below summarizes the most current available data (2018) from the US Census Bureau.

2018 Data	Both Genders		Male		Female	
Race	Number	Percent	Number	Percent	Number	Percent
White	294,960	83.4%	151,180	42.8%	143,780	40.7%
Hispanic	22,070	6.2%	12,745	3.6%	9,330	2.6%
Black/ African American	16,325	4.6%	9,045	2.6%	7,280	2.1%
American Indian or Alaska Native	564	0.2%	273	0.1%	294	0.1%
Asian	14,159	4.0%	7,950	2.2%	6,198	1.8%
Native Hawaiian/ Pacific Islander	369	0.1%	259	0.1%	105	0.0%
Multiple Race Categories Reported	5,100	1.4%	2,550	0.7%	2,560	0.7%

Table 1: Dallas, Guthrie, Madison, Polk & Warren County MSA Labor Force by Gender and Minority Group

3.2. DART Workforce vs. Availability Analysis: The overall composition of the DART workforce (except Officials/Administrators, who were compared to a national MSA) was compared with the available workforce in the Dallas, Guthrie, Madison, Polk & Warren Counties' Metropolitan Statistical Area (MSA). This was done not only for the overall DART workforce, but for specific employee categories. The goal of this comparison was to determine whether women and minorities were underrepresented in the various employee categories. In cases where women and minorities are found to be underrepresented for a particular employee category, DART will set goals to increase representation *(see Section 4)*.

3.3. Overall DART Workforce Composition vs. Availability by Race/Ethnicity

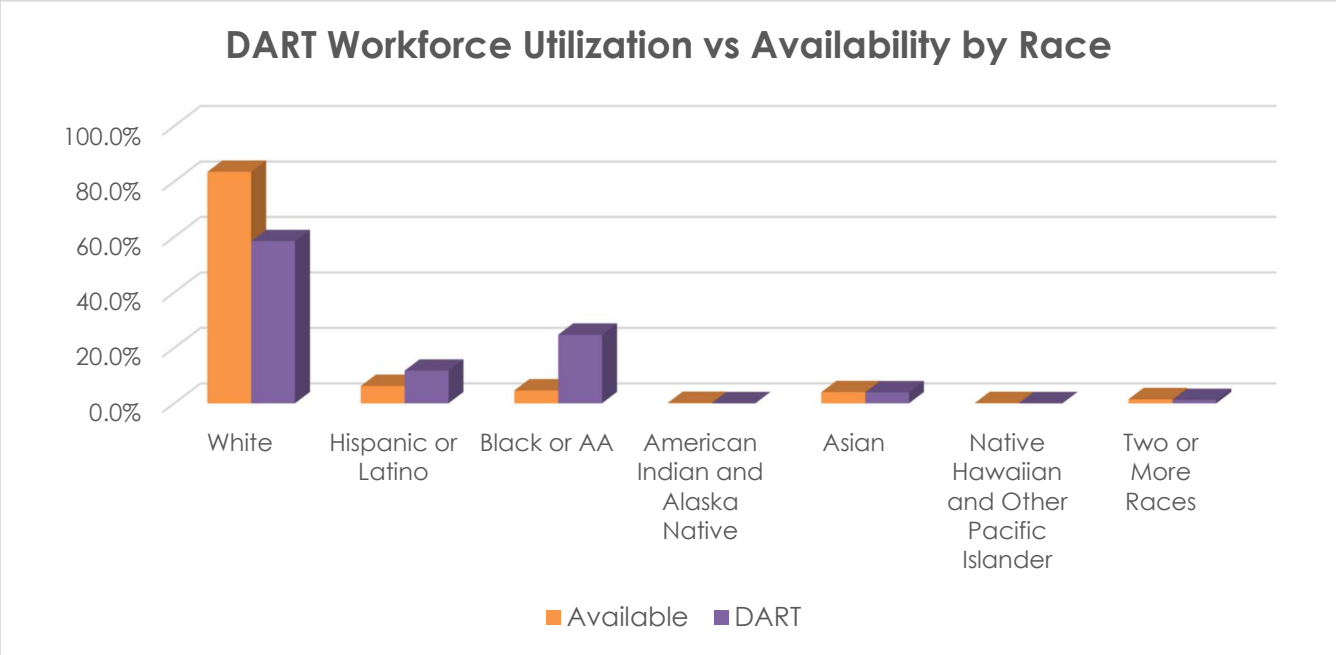


Chart 1: DART Workforce Utilization vs. Availability by Race/Ethnicity

Overall, minorities are well represented in the DART workforce. Minority workers make up 42 percent of the DART workforce, while the percentage of minority workers available in the Surrounding Counties MSA is 17 percent.

Black/African American workers are well represented in the DART workforce. About 25 percent of DART employees identify as Black or African American, which is well beyond the 4.6 percent available in the Surrounding Counties MSA. This represents a slight increase in the percentage of Black/African American employees from DART's 2018 workforce, when 22.9 percent of the DART workforce identified as Black/African American.

Hispanic workers are also well represented. Twelve (12) percent of the DART workforce identifies as Hispanic, versus 6 percent available in the Surrounding Counties MSA. This represents a slight increase in percentage of Hispanic employees in the DART workforce compared to 2018, when 9 percent of the DART workforce identified as Hispanic.

Consistent with previous reports, 4 percent of the DART workforce identifies as Asian, as compared to 4 percent of the available workforce in the Surrounding Counties MSA. The percentage of Asian employees in the DART workforce has been historically stable;

Just over one (1.2) percent of the DART workforce identifies as Multiple Race Categories, versus the 1.4 percent found in the available workforce in the Surrounding Counties MSA.

3.4. Overall DART Workforce Composition by Gender

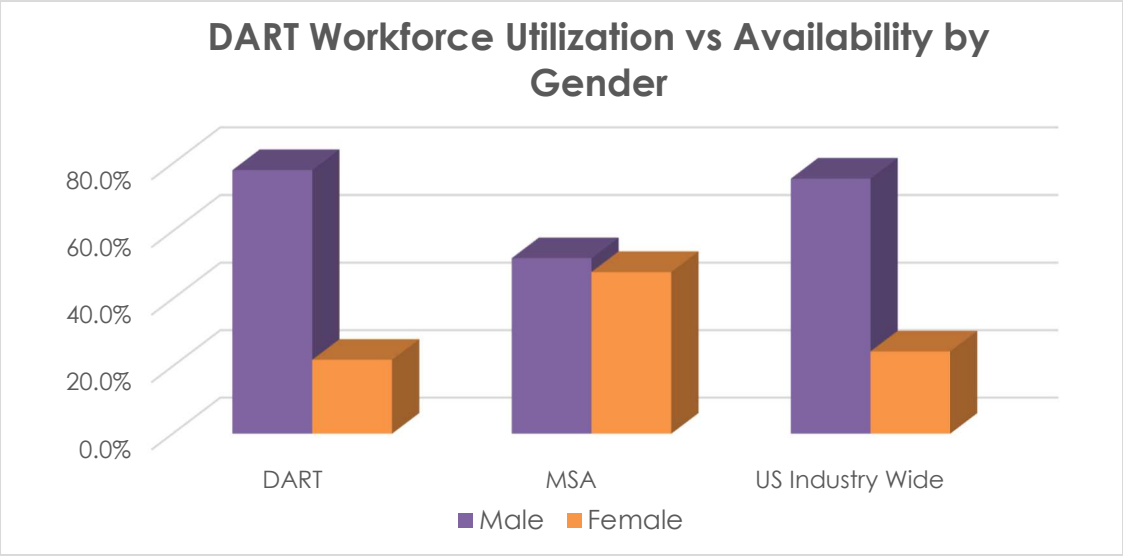


Chart 2: Percentage of Females in Workforce

DART's workforce is currently composed of 21.9 percent female employees and 78.1 percent male employees.

This percentage of females is slightly lower than the nationwide percentage of female employees working in Transportation and Material Moving Occupations, which is 24.4 percent (According to DATAUSA and Labeled as 'US Industry Wide' in the chart above).

The percentage of female workers available in the Des Moines Metropolitan Statistical Area (MSA) is 48 percent, which is significantly higher than the percentage found in DART's workforce.

3.5. Executives and Senior Leaders

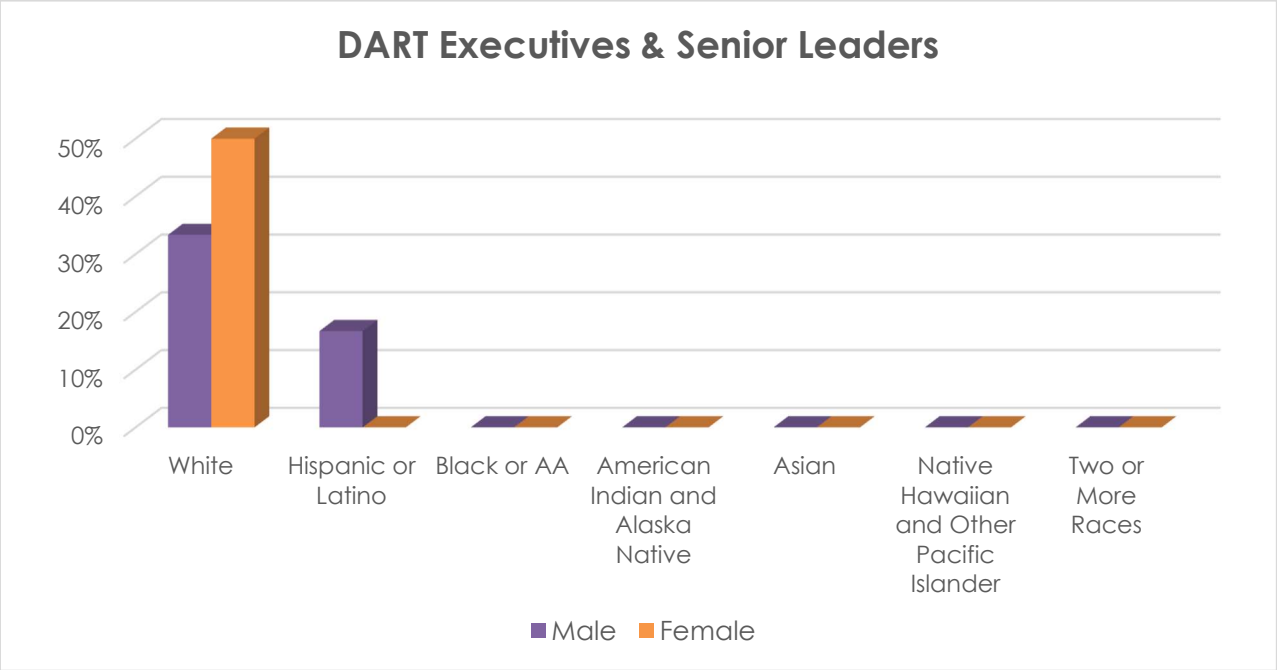


Chart 3: DART Executives and Senior Leaders

The available workforce considered for these positions is nationwide due to the recruitment strategies used for these positions. There is one minority employee in DART Executive and Senior Leader positions. This represents an increase since the 2018 DART Equal Employment Opportunity Plan was published. Our goals and timetables reflect the goal set forth to increase by one person during the next four years.

Females are represented well in DART Executive and Senior Leader positions, at 50 percent versus 40.6 percent in the available workforce. The percentage of females in Executive and Senior Leader positions at DART has decreased but remains competitive since DART's 2018 Equal Employment Opportunity Plan was published, with 80 percent then versus 50 percent now.

DART Executive and Senior Leader Positions	Employee Count
Chief Executive Officer	1
Chief Operations Officer and Deputy CEO	1
Chief Financial Officer	1
Chief Human Resources Officer	1
Chief Planning Officer	1
Chief External Affairs Officer	1

3.6. First/Mid-level Officials (minus Senior Leaders)

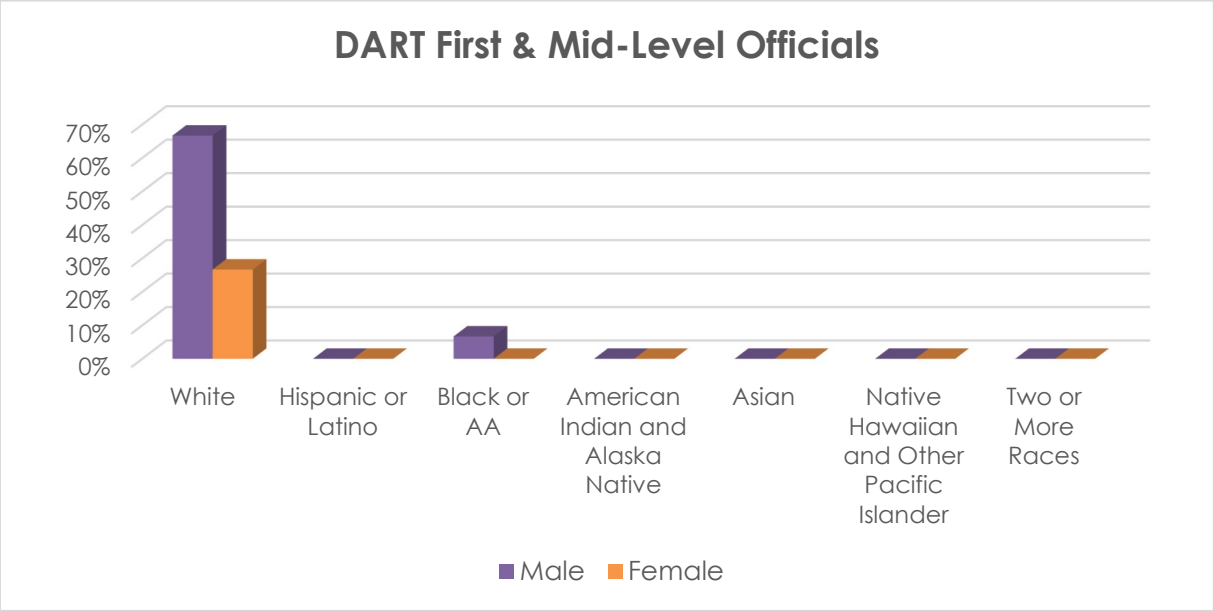


Chart 4: DART First/Mid-Level Officials

DART's First/Mid-level Officials category is comprised of our management team minus the senior leadership team which is analyzed separately above. The available workforce considered for these positions is nationwide due to the recruitment strategies used for these positions. Overall, minorities are underrepresented in DART's First/Mid-Level Officials. Nine (9) percent of DART First/Mid-Level Officials identify as minorities, which is less than the 20.7 percent available in the Nationwide MSA workforce. The percentage of minorities in DART's First and Mid-Level Officials has increased since DART's 2014 plan was published, when 3.8 percent of the First and Mid-Level Managers identified as minorities.

Seven (7) percent of DART First/Mid-Level Officials identify as Black/African American, which exceeds the 6.3 percent available in the Nationwide Counties MSA. All other minority groups are unrepresented in the First/Mid-Level Officials category.

Females comprise 45 percent of DART First/Mid-Level Officials, versus 39.9 percent in the available workforce. The percentage of females in the First and Mid-Level Officials category has increased since the 2014 plan was published. 34.6 percent of First and Mid-Level Managers were female at that time.

First/Mid-Level Officials	Employee Count
Transportation Manager	1
Fleet Manager	1
Facilities Manager	1
Marketing and Communications Manager	1

First/Mid-Level Officials	Employee Count
Business and Community Partnerships Manager	1
Public Affairs Manager	1
Finance Manager	1
Procurement Manager	1
IT Director	1
Human Resources Manager	1
Safety Manager	1
Training Manager	1
Customer Experience Manager	1
Service and Delivery Manager	1
Lead Operations Supervisor	1
Business Analyst Manager	1

3.7. Professionals

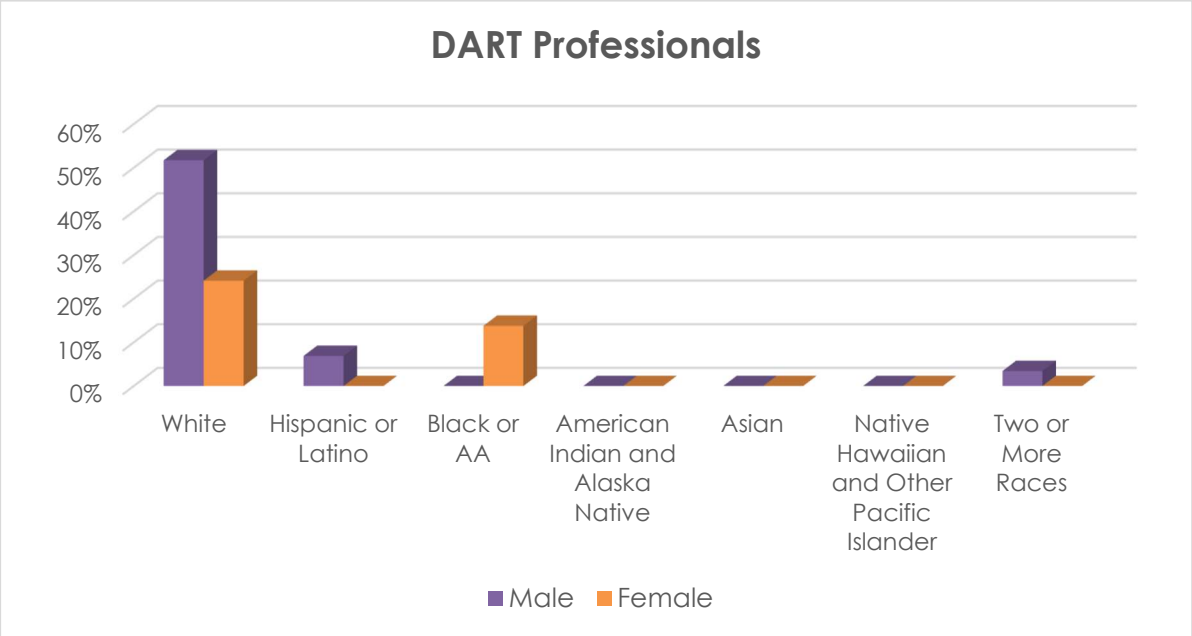


Chart 5: DART Professionals

Minorities are well represented in DART's Professionals category. Just over twenty-four (24.1) percent of DART Professionals identify as minorities, versus 21.9 percent available in the Surrounding Counties MSA workforce.

Fourteen (14) percent of DART Professionals identify as Black/African American, versus 3 percent available in the Surrounding Counties MSA workforce. Ten (10) percent of the DART Professionals category identify as Hispanic or Latino or Two or More Races.

The female Professionals category make up 37.9 percent at DART, which is below the 57.7 percent in the available workforce.

DART Professionals	Employee Count
Senior Staff Accountant	1
Staff Accountant	1
Grants Program Administrator	1
Mobility Coordinator	1
Customer Service Supervisor	1
Facility Building Supervisor	1
Operations Supervisor	6
Safety Training Specialist	1
Maintenance Supervisor	2
Rideshare Supervisor	1
IT Support Specialist	2
Executive Coordinator and Commission Clerk	1
System Engineer	1
IT Project Manager	1
IT Network Administrator	1
IT System Administrator	2
Communication Specialist	1
Senior Marketing Specialist	1
Marketing Communication Coordinator	1
Business Partnership Coordinator	1
Senior Transit Planner	1

3.8. Technician Workers

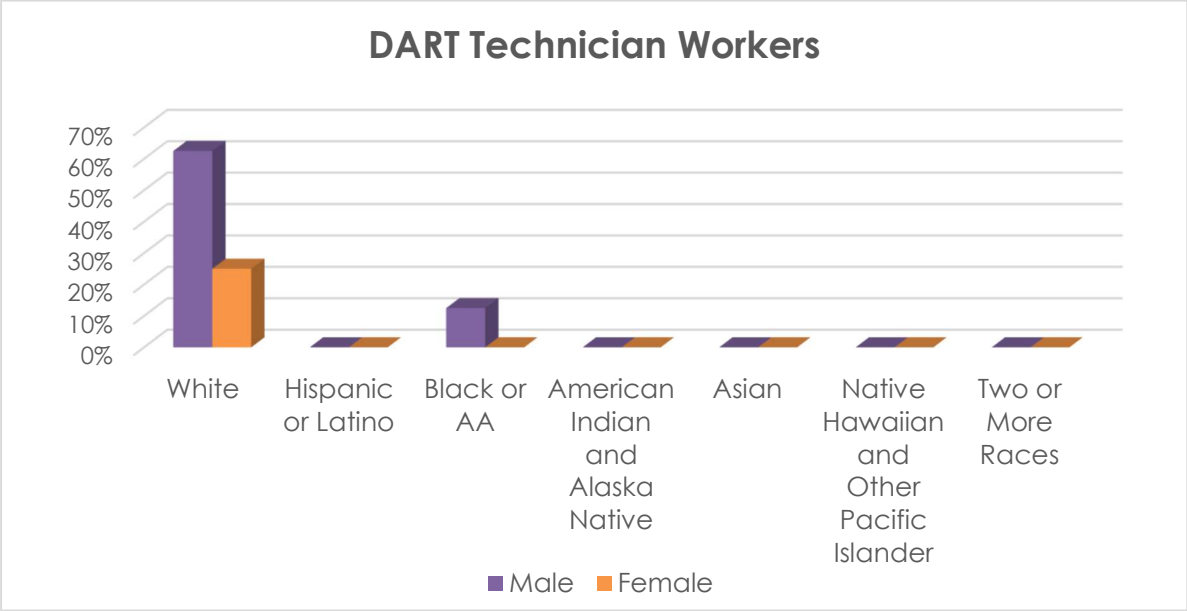


Chart 6: DART Technician Workers

DART has eight (8) employees in the Technician job category.

About 12.5 percent of DART Technician Workers identify as minorities, which is below the 25.9 percent available in the Surrounding Counties MSA workforce.

Twenty-five (25) percent of DART Technician Workers are female, which is below the 44.7 percent in the available workforce.

DART Technician Workers	Employee Count
Dispatcher	5
Graphic Designer	1
Transit Planner	1
Transit Scheduler	1

3.9. Administrative Support Workers

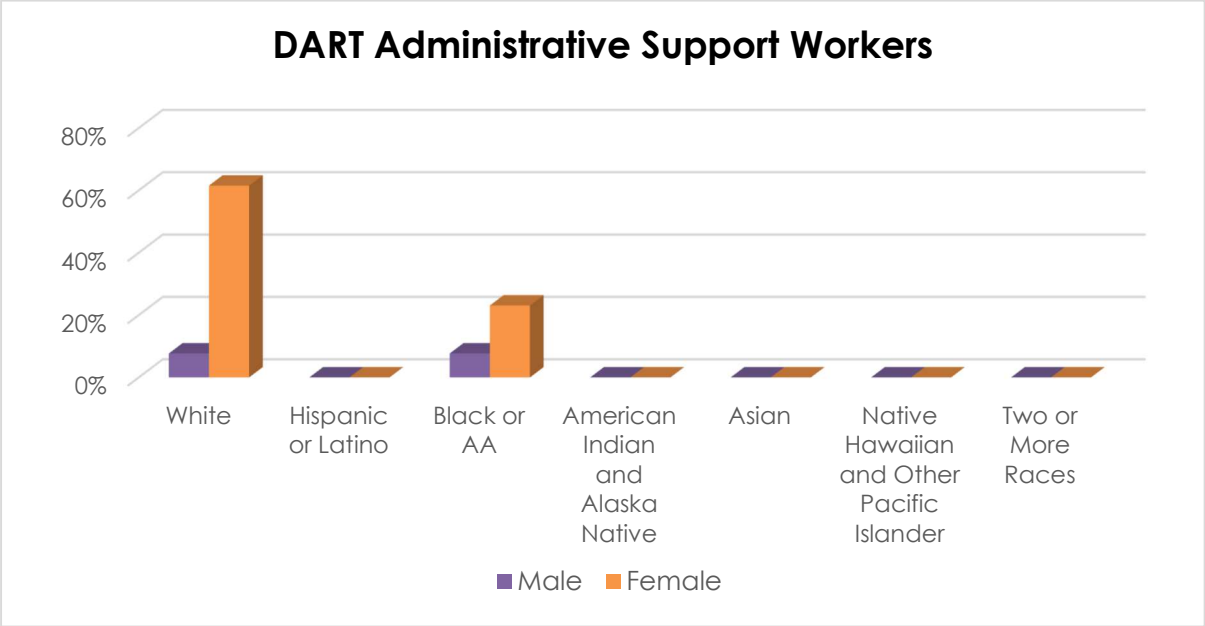


Chart 6: DART Administrative Support Workers

DART has thirteen (13) Administrative Support Workers.

Roughly, 38.5 percent of DART Administrative Support Workers identify as minorities, which exceeds the 13.4 percent available in the Surrounding Counties MSA workforce.

Females make-up 84.6 percent of DART's Administrative Support Workers, which is above the 59.7 percent in the available workforce.

DART Administrative Support Workers	Employee Count
Human Resource Specialist	1
Accounting Specialist	1
Customer Service Specialist	6
Executive Assistant	1
Administrative Assistant	2
Inventory Control Coordinator	1
Maintenance Administrative Coordinator	1

3.10. Skilled Craft

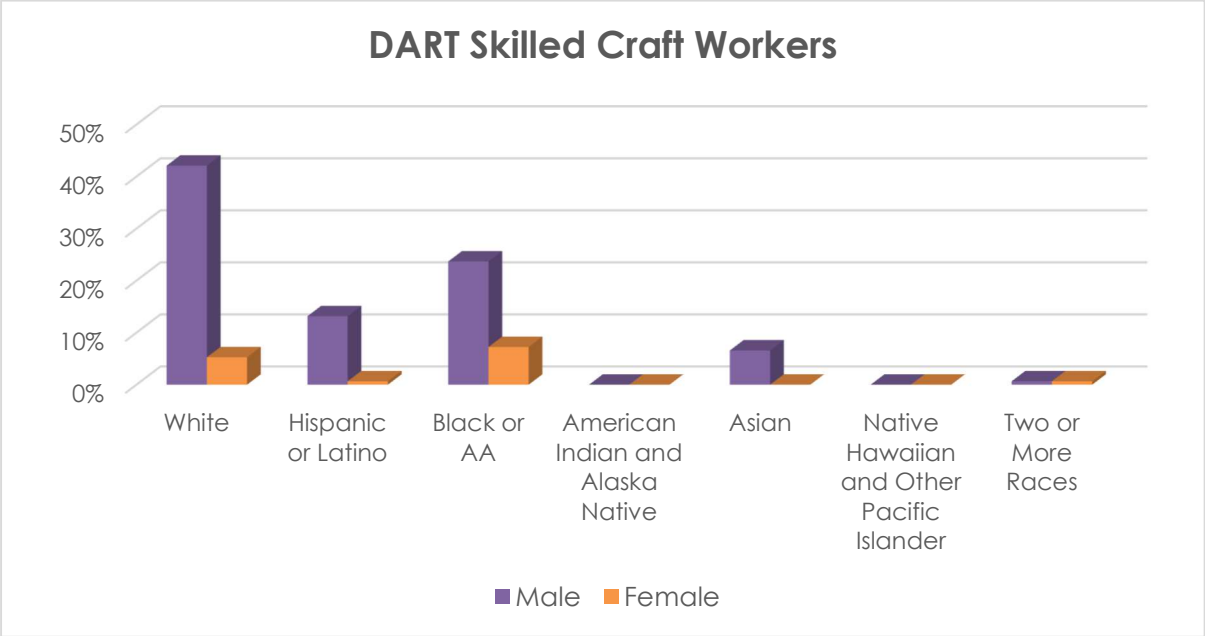


Chart 7: DART Skilled Craft Workers

This category includes all DART part-time and full-time vehicle Operators, including both Fixed Route and Paratransit as well as our Mechanic Technicians. The total number of employees in this category has decreased by 23 since the 2018 EEO Plan was published. DART now has 155 Skilled Craft Workers.

Minorities make-up 53.6 percent of DART's Skilled Craft Workers. This exceeds the 18.2 percent available in the Surrounding Counties MSA Workforce.

Females make-up 14.2 percent of DART's Skilled Craft Workers. This exceeds the 5.7 percent in the available workforce.

DART Skilled Craft Workers	Employee Count
Fixed Route Operator FT	112
Fixed Route Operator PT	23
Journey Level Technician	8
Master Technician	2
Paratransit Operator FT	22
Paratransit Operator PT	8
Technician 1	2
Technician 2	5
Technician 3	1
Technician 4	3
Body Shop Technician	2

3.11. Labors & Helpers

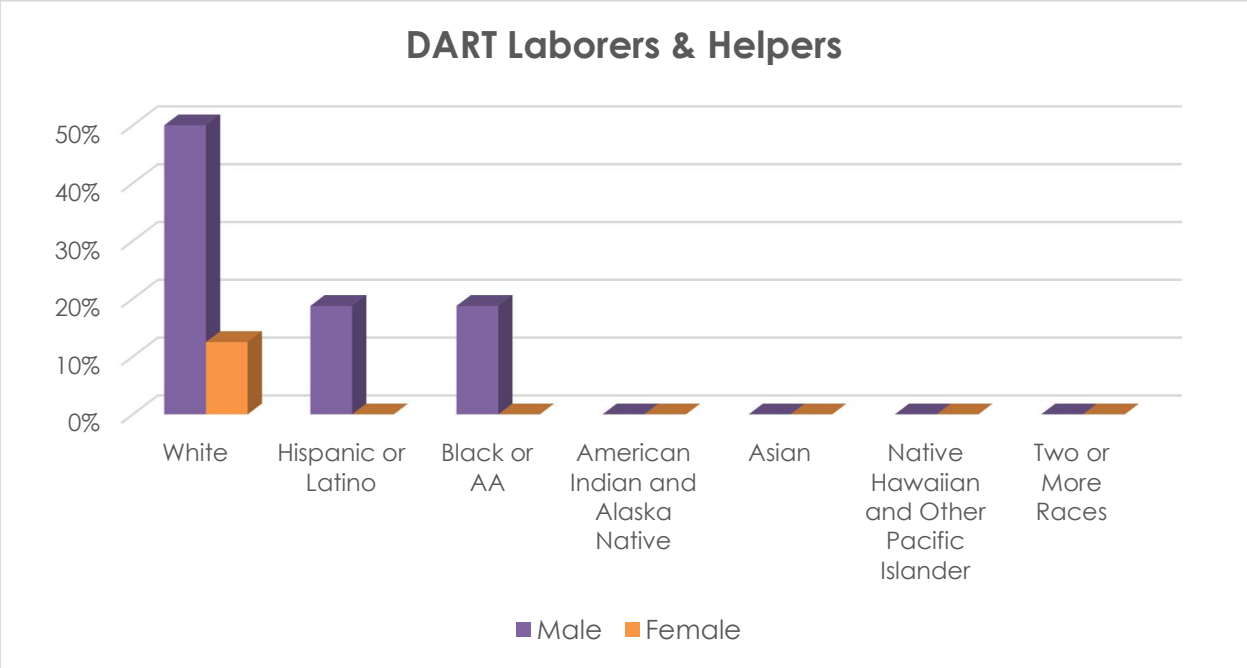


Chart 9: DART Labors & Helpers

DART currently has 17 people employed in the Laborers and Helpers category and 42.2 percent identify as minorities. This exceeds the 26.2 percent available in the workforce.

We have two female employees in this category. This leaves the Laborers and Workers category with an 11.8 percent female composition, which is considerably lower than the 44.6 percent in the available workforce.

DART Labors & Helpers	Employee Count
Service Person	8
Interior Cleaner	3
Building & Grounds Person	3
Inventory Specialist	1
Utility Person	1
Tire Person	1

4. GOALS AND TIMELINES

4.1 Past Plan Activity: DART performed a four-year analysis (2018-2021) of the number and percentage of minorities/females employed by DART. The purpose of this analysis was to determine if DART had made progress in the Equal Employment area.

In general, the analysis found that DART has remained relatively stable in the area of female/minority representation. Female representation has remained stable with a slight increase from 21.4 percent to 21.9 percent. Minority representation also increased from 38 percent to 42 percent.

DART set several goals in our 2018 EEO Plan, all of which were to be accomplished in the 2018-2021 timeframe. In analyzing the specific goals, stated, the following results were found:

1. Executives and Senior Leaders: DART will establish a goal of gaining a net increase of one person in the Minority representation as an Executive or Senior Leader. This goal was achieved. DART hired two minorities on the executive team with one leaving DART during this time for a net increase of one. DART will continue to monitor the diversity and set goals if necessary.

2. First and Mid-Level Officials: There were no goals set forth for this category as there was adequate representation for both Minorities and Females in this area prior to 2018. However, due to the slight decrease in minority representation, DART plans to set a goal for this category (see section 4.2).

3. Professionals: Minorities are adequately represented in the Professional category. DART established a goal of gaining a net increase of one person in the Female representation for Professionals. This goal was not achieved and will be a part of the plan for the next four years.

4. Technician Workers: DART established a goal of gaining a net increase of one person in the Female representation for Technicians. This goal was not achieved as female representation decreased over the 4-year period. Appropriate goals will be set forth.

5. Administrative Support Workers: Females are adequately represented in the Administrative Support Worker category. DART established a goal of gaining a net increase of one person in the Female representation for Administrative Support workers. This goal was achieved as the percentage of females went from 52 percent to 84.6 percent.

6. Skilled Craft Workers Minorities and Females: No goals were set forth by DART and this area will continue to be monitored closely to set necessary goals.

7. Operators: DART established the goal of a net annual increase of eight persons per year in the Female representation for Operators over the first

three years and seven additional female operators in year four, for a total net gain of thirty-eight female operators over the four-year period. This goal was not achieved. DART hired 25 female operators in the four-year timetable. Goals will be set forth to further identify ways to increase the female applicant pool.

8. Service Maintenance: DART established the goal of a net gain of five persons in the Female representation for Service Maintenance by utilizing the partnerships described within recruitment practices. This goal should be accomplished in the next four-year review period.

4.2 2022 Goals and Timetables: DART is an Equal Opportunity employer, and this plan is intended to assure equal opportunity in the recruiting, hiring and retention of DART personnel. To that end, we will establish the following goals:

1. Executives and Senior Leaders: DART made progress in increasing the applicant pool of minority candidates for leadership positions. No goals will be set forth for the upcoming timeline. DART will continue to monitor and will continue to diversify recruitment efforts in the event a leadership has a vacancy.

2. First and Mid-Level Officials: Females are adequately represented in the First and Mid-Level Officials category. DART will make a goal of gaining a net increase of one person in the minority representation. This will be accomplished with targeted recruitment efforts to increase overall applicant pools.

3. Professionals: Minorities are adequately represented in the Professional category. DART shall establish a goal of gaining a net increase of one person in the Female representation for Professionals. This goal should be achieved and maintained within one to four years, contingent on turnover and position availability. DART will continue to monitor the diversity within this category and make short-term goals if necessary.

4. Technician Workers: Minorities are adequately represented in the Technician Worker category. DART shall establish a goal of gaining a net increase of one person in the Female representation for Technicians. This goal should be achieved and maintained within one to four years, contingent on turnover and position availability. DART will continue to monitor the diversity within this category, make short-term goals if necessary.

5. Administrative Support Workers: Minorities and females are adequately represented in the Administrative Support Worker category. No further goals will be created but DART will continue to monitor this category and make goals if necessary.

6. Skilled Craft Workers: Minorities and Females are adequately represented in the overall Skilled Craft Workers category.

7. Operators: DART shall establish the goal of a net annual increase of six persons per year in the Female representation for Operators over the next three years and 5 additional female operators in year four, for a total net gain of 23 female operators over the next four years. It is important to note that only 32 percent of applicants are female. Because of this, DART will have to perform community outreach and encourage additional female applicants for operator positions in order to achieve this goal.

8. Service Maintenance: DART shall establish the goal of a net gain of five persons in the Female representation for Service Maintenance by utilizing the partnerships described within recruitment practices. This goal should be accomplished in the next four years.

2022-2026 EEO Program Goals Summary

Position Classification	Total		Goal
Executives and Senior Leaders	**Minority**	1	--
	Female	3	--
First and Mid-Level Officials	**Minority**	1	+1
	Female	4	--
Professionals	**Minority**	7	--
	Female	11	+1
Technician Workers	**Minority**	1	--
	Female	1	+1
Administrative Support Workers	**Minority**	4	--
	Female	11	--
Skilled Craft Workers	**Minority**	79	--
	Female	22	+23
Service Maintenance	**Minority**	6	
	Female	2	+5

5. ASSESSMENT OF EMPLOYMENT PRACTICES

5.1. Recruitment: DART has a recruitment and hiring process which constitutes a systematic method of contacting all segments of the community. Since 2013, DART cultivated recruiting relationships with several local institutions, including the Des Moines Area Community College (DMACC) Transportation Institute, Iowa Workforce Development and many other local entities. In 2019, recruiting outreach was expanded with the objective of reaching more diverse candidate pools. These relationships are helping to increase the diversity of our applicant pool for DART positions. Some of the additional outreach includes, radio advertisement, open interviews, targeted posting on the bus, diverse websites, and specific community partners such as AARP, Urban Dreams and many others.

This hiring procedure is updated as necessary; DART's last process review was conducted in January 2022. DART's HR Department reviews applicant and employee statistics to ensure that the equal employment opportunity effort is successful in the area of employee recruitment. DART has a computerized program system designed specifically for EEO-4 tracking purposes that has made pertinent statistical data readily available from 1999 to present. We have advanced our applicant tracking information to collect necessary information on veterans and disabled employees.

DART commissioned job analyses of all Operations positions in 2017 and reviewed the analyses again in 2019 in order to validate and update (as necessary) job descriptions and job postings. DART partnered with the occupational therapy provider to conduct the analyses which will also be used to establish post offer functional physical exams in the future. Minor updates were made to the physical demands of the Operator and Mechanic position descriptions to accurately reflect the day-to-day requirements of the positions.

5.2. Selection/Hiring: DART takes a 'whole-person' approach, so applicant's qualifications, work history and safety records are also reviewed and play an important part in determining the candidate best suited for the position. Tests that may be used during the hiring process for office and clerical staff are Microsoft Word and Excel tests that are administered through the Iowa Workforce Development offices. Not all administrative positions are required to take the test depending upon their specific job duties.

DART will continue to observe the requirements of Executive Orders 11246 and 11375, as amended, pertaining to the validation of employee tests and other selection procedures. DART does not discriminate or consider as employment criteria such data, which would unfairly discriminate or exclude certain minorities, individuals with disabilities, or women. Examples of the type of employment information, which could be detrimental to applicants, might include an individual's arrest record, credit status, or driver's license history.

DART's Application Form does not have a reference to either the individual's sex or age. Applicants are invited to complete a voluntary self-identifying form including self-identification for veterans and persons with disabilities during the application

process, though this information is kept separate from the application and is restricted for review by the system administrator (a member of the Human Resources team) or anonymous reports with quantitative data. The Application form does contain the question, "Have you ever been convicted of a crime other than a minor traffic violation?" and for driving positions, "In the past seven years, have you been convicted of a felony?" DART uses both the answers to this question and the results of post-offer criminal background checks when making hiring decisions. To ensure compliance with our EEO Program, all background checks in question are reviewed by the HR Manager or Chief Human Resources Officer for the ultimate hiring decision.

Arrests are not considered, as this may create adverse impact on minority applicants. Criminal convictions do not automatically disqualify an applicant from being hired for all positions. DART's Human Resources team carefully considers the nexus of the criminal conviction to the job duties, the time since the conviction, and the applicant's work record since the conviction when making hiring decisions. As a subcontractor for Des Moines Public Schools (DMPS), all operators who operate on fixed route service and who interact with DMPS school children are prohibited from having any violent felony conviction on their background check results. In situations where this requirement causes potential harm, the Human Resources Department suggests other positions (e.g., paratransit operator) instead. Furthermore, as a recipient of Medicaid reimbursement for our paratransit operations, we have to ensure that an employee/applicant does not have a violent felony conviction.

Applicants are selected for employment based on their ability to perform the essential functions of the position for which they are applying. In cases of a qualified disabled applicant, reasonable accommodations will be made to assure that no barriers to employment opportunities exist, absent undue hardship. DART continues to make reasonable accommodations for employees, when necessary, absent undue hardship.

For more senior level administrative positions, hiring managers can choose to use the Birkman model which helps them to get to better understanding of candidates before hiring. The model assesses an individual's interest, needs or expectations and behaviors. It's particularly targeted towards assessing individuals in the world of work.

EEO Category Applicants	Male	Female	Gender: Did Not Disclose	White	Black or African American	Asian	American Indian or Alaska Native	Native Hawaiian or Pacific Islander	Hispanic or Latino	Two or More Races	Race: Did Not Disclose	Veteran Status	Disability Status
Officials/Administrators	471	197	167	622	57	47	3	1	26	14	65	55	34
Professionals	556	273	206	763	100	40	4	1	34	30	63	59	80
Technicians	68	65	46	122	38	1	0	0	0	5	13	7	18
Admin. Support	839	1016	416	1000	295	619	10	3	80	82	182	29	147
Skilled Craft	42	2	10	24	13	5	0	0	6	1	5	5	3
Service Maintenance	768	360	327	606	474	38	8	1	74	46	208	63	118
Grand Total	2744	1913	1172	3137	977	750	25	6	220	178	536	218	400
% of Hired	47.1%	32.8%	20.1%	53.8%	16.8%	12.9%	0.4%	0.1%	3.8%	3.1%	9.2%	3.7%	6.9%

Table 2: Applicant Data for the Period 2018-2021

EEO Category Hires	Male	Female	Gender: Did Not Disclose	White	Black or African American	Asian	American Indian or Alaska Native	Hispanic or Latino	Two or More Races	Race: Did Not Disclose	Veteran Status	Disability Status
Officials/Administrators	9	2	4	9	1	0	1	1	0	3	1	0
Professionals	16	9	10	23	5	0	0	1	1	5	1	2
Technicians	1	1	3	2	1	0	0	0	0	2	0	0
Admin. Support	10	14	10	18	3	2	0	0	1	10	1	1
Skilled Craft	10	0	0	5	3	2	0	0	0	0	0	1
Service Maintenance	113	65	89	82	78	3	1	14	11	78	8	16
Grand Total	159	91	116	139	91	7	2	16	13	98	11	20
% of Hired	59.6%	34.1%	43.4%	52.1%	34.1%	2.6%	0.7%	6.0%	4.9%	36.7%	4.1%	7.5%

Table 3: Hiring Data for the Period 2018-2021

5.3. Training: The Equal Employment Officer will ensure that minority, disabled and female employees are encouraged to increase their skills and job potential through participation in training and education programs offered by community educational institutions and DART.

An Apprenticeship Program is followed for all diesel mechanic personnel. The qualifications for each of the four levels of Apprenticeship are available to all employees seeking information on promotions within the department or transfers from another department.

DART's Maintenance Department has a mandatory monthly safety meeting and weekly toolbox talks in which at least one training issue is discussed in an effort to maintain an effective and knowledgeable maintenance staff. In addition, the Maintenance Department offers both in-house and external training on equipment and will ensure all licensing and required certificates are on file for all positions needing up-to-date training and certification.

DART has developed an extensive training program for both Fixed Route Bus Operators and Paratransit Bus Operators. Initially, the training involved with a new employee is very extensive and includes both classroom style and on-the-job

training. DART's Fixed Route and Paratransit Operator Training covers special issues such as the proper operation of a mobility device lift, assisting passengers in mobility devices, conflict de-escalation and CPR training. The Paratransit program pays special attention to assisting passengers into and out of the vehicle among many other special issues they face with their clients. The Paratransit and Fixed Route Departments also have mandatory monthly safety meetings in an effort to maintain an effective and knowledgeable transit staff which covers various operational and safety issues such as properly operating equipment in inclement weather, defensive driving, customer service issues, and many others. In 2017 DART introduced *Transit Ambassador* training to Operators and Management personnel to further develop skillsets related to operating under DART's three operational priorities: Safety, Service and Schedule. Other topics that both Departments present at their monthly meetings that are related to our overall organization include harassment and discrimination, workers compensation safety, and the purpose of DART's employee assistance program and other benefits.

Administrative staff has various means of communicating both organizational and departmental information and the means of communication vary throughout DART's different administrative departments. Some departments meet in person in weekly staff meetings while other departments who have restricted ability of meeting with the entire department may communicate information through internal memos or e-mail. DART has a goal of providing Administrative staff with a minimum of eight hours of training annually; in the last four years training topics have included harassment, performance management, diversity and inclusion, communication styles and others. A bulletin board is located in the break rooms at both buildings and all training opportunities are posted for staff to consider.

If an employee wishes to attend a course or seminar, they need to contact their immediate supervisor and receive their approval. If certain positions require specialized training or certification in order to be compliant with changing regulations or mandatory instruction needed for their position, the Human Resources Department will ensure that all employees obtain the appropriate information to register for training. Lastly, the tuition reimbursement program annual contribution is available for all non-union employees with at least one year of service. Any administrative staff employee who wishes to obtain a degree from an accredited university or college may obtain financial help from DART.

In reviewing these training procedures, we do not find an adverse impact on minority, disabled or women employed with us.

5.4. Promotion Procedures: When a vacancy occurs for both union and non-union positions, a posting with position information regarding the position is placed on various bulletin boards located throughout the organization directing all applications to be made through our applicant tracking system.

The postings direct the individual to apply through our applicant tracking system which can be reached through our website at www.ridedart.com/careers. Our applicant tracking system has been designated as the central posting location for

all job vacancies to ensure all employees have the ability to apply; this online system can be accessed from anywhere, as well as four computers on DART premises specifically designated for Operations employees' use. In this manner, we can determine if there are current employees who are qualified for the open position.

Candidates for promotion will continue to be chosen on the basis of their qualifications and work record, without regard to race, creed, color, sex, age, religion, national origin or disability. Performance appraisals and work records for all personnel including minority group, disabled and female employees will continue to be examined when a promotional position arises.

When a non-exempt (union) vacancy occurs, a bid posting is hung on a designated bulletin board in accordance with the collective bargaining agreement. Once all interested candidates apply in the designated time that is allowed, the departmental supervisor and other members of management review the qualifications and personnel records of internal employees before a final selection is made. When the vacancy is not filled through the bidding procedure, or where management determines that internal employees lack the necessary qualifications to fill the position, outside recruiting sources are utilized.

DART is researching ways to create optional career paths upon hire which would include individual and group training, job shadowing, mentorship and promotional opportunities when appropriate.

5.5. Compensation and Working Conditions: It is DART's policy to pay its employees a salary that is competitive with other transit systems and competitive with similar duties performed in other industries so that compensation does not create a barrier to the recruitment of minority, disabled and female individuals. DART's Human Resources Department reviews market compensation data every three to five years to ensure there are no barriers. DART performed a compensation study for all administrative positions in 2020 and brought all compensation within market range. DART implemented a compensation and pay philosophy to create consistency and opportunity for all administrative employees. Opportunities for performing overtime work or otherwise increasing compensation will be afforded to all qualified employees without regard to discrimination based on age, creed, color, race, sex, religion, national origin or disability. It is DART's policy to compensate all employees equally based upon job classification, experience, duties, and ability.

The Equal Employment Officer will conduct periodic audits at DART to ensure that Equal Employment Opportunity posters are properly displayed and that all facilities used for the benefit of employees are in fact desegregated, both in policy and use. In addition, such periodic audits will be utilized to ensure that minority, disabled and female employees are afforded a full opportunity, and are encouraged to participate in all the transit system's sponsored educational, training, recreational and social activities. Locker rooms, clothes, storage areas and rest rooms are comparable for both sexes.

After reviewing DART's pay, compensation and working condition procedures, no adverse impact was found for minorities and women employed by DART.

5.6. Layoffs: DART's process for conducting layoffs is based on seniority and is detailed in the collective bargaining agreements with the Amalgamated Transit Union Local #441 These practices and provisions have been reviewed and found to be non-discriminatory.

Any employee who feels his/her layoff or termination was the result of discrimination may appeal the decision through the Amalgamated Transit Union Local #441, depending on their job classification. In addition, any employee who feels his/her layoff or termination was the result of discrimination may seek relief by submitting a claim to the EEO Officer and/or Federal, State, or Local Agencies.

5.7. Discipline and Terminations: From 2018-2021, 295 DART employees terminated employment. Table 4 (below, shows the number of employees that terminated employment during this time period, by EEO category, race and gender.

Terminations	Male	Female	Gender: Did Not Disclose	White	Black or African American	Asian	American Indian or Alaska Native	Hispanic or Latino	Two or More Races	Race: Did Not Disclose
Officials/Administrators	6	5	0	10	1	0	0	0	0	0
Professionals	16	6	0	19	2	0	0	0	1	0
Technicians	0	1	0	1	0	0	0	0	0	0
Admin. Support	19	19	0	26	5	2	0	3	2	0
Skilled Craft	5	0	0	3	2	0	0	0	0	0
Service Maintenance	154	61	3	105	71	12	1	15	4	10
Grand Total	200	92	3	164	81	14	1	18	7	10
% of Hired	67.8%	31.2%	1.0%	55.6%	27.5%	4.7%	0.3%	6.1%	2.4%	3.4%

Table 4: Employee Terminations by Race and Gender 2018-2021

Forty-one percent of employees terminating employment during this time period identify as minorities, which is very close and proportional to the 39.8 percent of the DART workforce that identify as minorities. Of the employees that terminated during this time period, 31.2 percent were female, which is slightly higher than the 21.2 percent found in the DART workforce.

DART's disciplinary procedure for employees are covered under our collective bargaining agreements and found in our employee handbooks. Both documents follow the procedures described below.

The discipline procedure has been developed to standardize types of penalties for various violations and to inform employees of penalties that may be imposed for successive violations of rules and regulations. It will serve as a guide to employees and the supervisor involved in disciplinary matters. The procedures will not be considered a hard and fast limitation on supervisory personnel in dealing with disciplinary matters. Penalties for multiple violations occurring at the same or similar time will be dealt with at the discretion of the transit system. Whenever disciplinary action is contemplated, the transit system will consider the employee's

total record and work history before determining the penalty. The employee's entire work record will be reviewed to determine whether a particular violation is an isolated incident in an otherwise good record or is indicative of a continued pattern of violations. Such determination will subject first violators to the appropriate disciplinary steps (1 or 2).

Employees follow our Ethics and Code of Conduct Policy which is summarized as follows: *DART maintains certain policies to guide employees with respect to standards of conduct. It is important for all employees to refrain from engaging in improper activities that could damage DART's reputation or otherwise result in serious adverse consequences to the organization and/or the employee. The purpose of this policy is to establish the standards of conduct and with respect to certain types of payments and political contributions. Any infraction of said policy may include disciplinary action up to and including termination of employment.*

Disciplinary actions for bargained employees will be based on a four-step disciplinary action procedure for most violations as laid out in the contract; however, severe violations may require special discipline, suspension, or discharge on the first violation. Discipline for violations considered non-severe may include the following:

1. First Violation: Documented conference
2. Second violation: Written warning
3. Third Violation: Suspension and final warning
4. Fourth Violation: Subject to termination.

Examples of violations that will subject employees to disciplinary procedure are:

- Valid customer complaints
- Improper operation
- Absent without leave
- Voluntary neglect to collect fares
- Cutting trips
- Short turning
- Improper uniform
- Excessive absenteeism
- Passing up passengers at stops
- Failure to enforce transfer policy
- Lose outs
- Taking wrong coach on pull out
- Failure to make proper reports (other than accident report)
- Running off route

- Exchanging work without authorization
- Smoking where forbidden
- Failure to turn in lost article
- Failure to give correct information to public
- Neglect to take security measures when parking bus
- Running ahead of schedule
- Neglect to display proper signs and route numbers
- Failure to notify Dispatcher in case of accident, breakdown or street blockage
- Running late on schedule for no valid reason
- Absenteeism
- Excessive Break or Meal Periods
- Failure to use Safety Equipment
- Neglect to follow safety procedures
- Early Punch In
- Willful Destruction of DART Property
- Sleeping While on Duty
- Insubordination
- Weapons
- Stealing

After reviewing DART's lay-off and termination procedures, no adverse impact was found on minorities and women employed by DART.

5.8. Agency Monitoring and Reporting: DART relies on Great Plains, a human resources and accounting information system, and BirdDogHR, an applicant tracking system, to track information about the diversity of its workforce and candidate pool. The BirdDogHR system allows DART to track gender, age, racial/ethnic data, veteran status and disability status, if they choose to provide us this information on a voluntary Equal Employment Opportunity Survey, and can consolidate this information into various reports. Great Plains is currently being reviewed to import Disability and Veterans statuses to enable monitoring and reporting on these two areas within our employee base. These reports are used to ensure we are making progress toward EEO goals and are complying with all relevant labor laws.

DART Human Resources also prepares a monthly recruitment, vacancy and turnover report. This report details all hiring, placement, transfers, layoffs, recalls, promotions and terminations. The EEO Officer (Chief Human Resources Officer) examines this report to ensure that the goals established by DART are being met. If corrective action needs to be made, the EEO Officer will discuss the problem with the individuals involved and appropriate action will be taken.

Going forward, the EEO Officer will also consolidate this information into a monthly report for the DART Senior Leadership Team, including the CEO, as a priority within the organization. Their input to related goals and initiatives is essential in ensuring the program's success across the organization. The EEO Officer will work with the Executive Coordinator to document these conversations and any associated action items.

DART does not have any subrecipients and/or contractors to monitor in regards to associated EEO Programs.

The EEO Officer (Chief Human Resources Officer) is involved in all collective bargaining agreement negotiations, ensuring there is no disparate impact with the contracts described within this document.

EEO complaints are monitored by the EEO Officer. All EEO complaints are directed to and investigated by the Human Resource department, unless there is a conflict of interest, in which case the CEO would oversee the investigation. DART has had six EEO complaints since the last EEO Program was submitted; five have been resolved and closed and one remains in conciliation. All complaints are reported on DART's EEO Complaint Log and the EEO Officer reviews this log for trends any time a new complaint is added. If a trend of disparate treatment or impact was found, the EEO Officer would work with the appropriate department head to resolve the issue.

Complaints are investigated as quickly as reasonable, within 24 hours. The EEO Officer interviews everyone involved and works directly with the appropriate department head to resolve any confirmed cases of discrimination. Following a perceived and/or confirmed case of discrimination, the EEO Officer reports to the senior leadership team the investigation findings and a recommendation for communication and training across the organization, as appropriate.

The EEO Officer (Chief Human Resources Officer) and the CEO meet bi-weekly to discuss HR-related matters, including EEO Program updates as needed. Reports are given to the Senior Leadership Team on a quarterly basis at regularly scheduled team meetings on the progress being made toward Agency EEO goals and objectives.

5.9. Contractors and Subcontractors: DART tracks the awarding of contracts and subcontracts by race and gender through our Disadvantaged Business Enterprise (DBE) Uniform Reporting Process as applicable. This biannual report is filed with the FTA.

DART requires all bids from contractors to contain Document 00 45 36, the Equal Employment Opportunity Data Reporting Form. This form documents the diversity in the contractor's workforce, as well as certified Targeted Small Businesses that the contractor contacted to solicit quotes for subcontracted work. DART contracts contain the following clause regarding discrimination and Disadvantaged Business Enterprises:

"The contractor or subcontractor shall not discriminate on the basis of race, color, national origin, or sex in the performance of this contract. The contractor shall carry out applicable requirements of 49 CFR Part 26 in the award and administration of DOT assisted contracts. Failure by the contractor to carry out these requirements is a material breach of this contract, which may result in termination of this contract or such other remedy as the recipient deems appropriate.

The prime contractor agrees to pay each subcontractor under this prime contract for satisfactory performance of its contract no later than thirty days from the receipt of each payment the prime contractor receives from DART. The prime contractor agrees further to return retainage payments to each subcontractor within thirty days after the subcontractor's work is satisfactorily completed. Any delay or postponement of payment from the above referenced time frame may occur only for good cause following written approval of the DART. This clause applies to both DBE and non-DBE subcontractors."