



King County Metro

2022 EEO Program Report

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March 1, 2022



King County

METRO

Moving forward together

This document is available in alternate and accessible formats upon request by contacting the EEO Office:

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Remarks from Metro’s General Manager

I want to recognize the talented workforce of King County Metro for their dedication in keeping King County moving despite the unprecedented challenges and hardships brought by the COVID-19 pandemic. Your commitment to our service has played a vital role in the region’s recovery and rebuilding efforts. Thank you for practicing excellence in your crafts, prioritizing safety, providing outstanding service to our customers, and taking care of each other.

This Equal Employment Opportunity Program Report is part of our documented compliance to the Federal Transit Administration (FTA) in developing a workplace where everyone can succeed, thrive, and grow. Requirements and Guidance from the FTA regarding EEO Programs can be found in the [FTA Circular 4704.1A](#).

This report to the FTA is not merely a compliance requirement; it is a commitment that Metro will protect your rights granted under the law fought for by generations of civil rights leaders, including our county’s namesake, Dr. Martin Luther King, Jr. This report is also a document of accountability and transparency that publicly states our continued commitment to equity and developing a workforce that reflects the communities we serve.

As a lifelong transit rider and as General Manager, I am personally committed to building a workplace that embraces a daily responsibility to treat all current, future, and aspiring Metro employees with civility, dignity, and respect. I encourage everyone to take time to read this report, learn about the important role of the EEO Office, and move forward together.

If you have questions about this report, please contact the EEO Office at MetroEEO@kingcounty.gov or (206) 477-9454.



With deep appreciation,

A handwritten signature in black ink that reads "Terry White". The signature is stylized and cursive.

Terry White
General Manager

About Metro

King County Metro (Metro) is the Puget Sound region's largest public transportation agency. Metro provides bus, paratransit, vanpool, and water taxi services, and operates the Seattle Streetcar, Sound Transit Link light rail, and Sound Transit Express bus services. Metro is committed to providing safe, equitable, and sustainable mobility, and prioritizing service where needs are greatest.

Metro employs over 5,000 employees who keep our region moving, knowing that mobility connects people to opportunity – and that destination is sometimes more than an actual place. Metro also continues to innovate and grow from the expansion of the Rapid Ride bus services and light rail to its investment into a green future with zero-emission battery-electric coaches.

The years 2018-2021 represent a period of incredible transition, growth, and challenge to the organization and functions of Metro. In 2018 and early 2019, Metro transitioned and was reorganized from a division to a standalone Department within King County government. In early 2020, as COVID-19 began to rapidly spread throughout the world, Metro continued to provide its service with professionalism, despite strained resources. This period also saw the appointment of Metro's new General Manager, Terry White, a lifelong public transit rider and a 33-year Metro veteran.

In late 2021, a new EEO Officer was appointed and a new EEO Office structure was developed: one that seeks to connect civil rights to racial equity, increases transparency and trust with employees, and works cooperatively with other Metro divisions, including the Employee Services, Transit Employee Labor Relations, and the Equity, Inclusion, and Belonging team. Metro and its EEO Office are working hard to ensure employees and future employees are treated with dignity and given opportunities to succeed and thrive.

Policy Statement¹

King County Metro Transit (Metro) possesses a strong commitment to the community we serve and to its employees. Further, Metro believes that equal employment opportunity, diversity and an inclusive work environment is foundational to the provision of the highest quality service we seek to provide. Metro's commitment is predicated on the fact that successful achievement of EEO goals will benefit Metro and any applicable sub-recipients and contractors through fuller utilization and development of previously underutilized human resources.

As an equal opportunity employer, Metro strives to have a workforce that reflects the community we serve. Additionally, Metro is committed to non-discrimination and Equal Employment Opportunity for all persons. Therefore, no person shall be unlawfully excluded from employment opportunities based on race, color, age, sex (including gender identity, sexual orientation, and pregnancy), marital status, religion, ancestry, national origin, genetic information, veteran status, disability, or other protected class. This policy applies to all employment practices and actions, including but not limited to, recruitment, hiring, selection for training, promotion, transfer, demotion, layoff, termination, rates of pay and all other forms of compensation including, benefits, and all other terms and conditions of employment.

This policy reaffirms that all applicants and all employees have the right to report incidents of alleged discrimination and to file complaints alleging discrimination with Metro's EEO Officer, their immediate supervisor, any other member of management within the agency, Transit Human Resources, the General Manager/Department Director or designee, the King County Human Resources Director or designee, the County's Diversity Manager, and/or enforcement agencies such as the King County Office of Civil Rights and Open Government, the Equal Employment Opportunity Commission, and the Washington State Human Rights Commission.

Retaliation against any 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.

Metro is committed to providing reasonable accommodations to applicants and employees who need such accommodations due to disability or as required to practice or observe their religion unless such accommodation causes undue hardship.

As Metro's General Manager, I maintain overall responsibility and accountability for Metro's compliance with its EEO Policy and Program. To ensure day-to-day management, including program design, preparation, monitoring, and complaint investigation, I have appointed the following as Metro's EEO Officer who reports directly to me and acts with my authority with all levels of management, labor unions and employees:

Christopher Bhang
King County Metro Transit (Metro) EEO Officer
Email: MetroEEO@kingcounty.gov
Phone: 206-477-9454

¹ As distributed to all Metro Employees on November 1, 2021. See Attachment 1, EEO Policy Statement and Q&A.

KSC-TR-0415
201 S. Jackson Street, Suite 415
Seattle, WA 98104

Even in light of the above stated appointment of Metro's EEO Officer, all Metro executives, management, and supervisory personnel share in the responsibility for effective implementation and monitoring of Metro's EEO Policy and Program within their respective areas and will be assigned specific tasks to ensure compliance is achieved. Therefore, Metro will evaluate its executives', managers' and supervisors' performance on their effective implementation of Metro's policies and procedures, in the same way Metro assesses their performance regarding other agency goals.

Metro 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 to make the EEO Program available for inspection by any employee or applicant for employment upon request.

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

Terry White

General Manager, King County Metro Transit
Updated and Signed November 1, 2021

Dissemination of Policy

Metro is committed to keeping its workforce and applicants aware and informed of the work and important role of the EEO Office. The dissemination of the EEO Policy Statement is explained in Metro's Policies and Procedures, PER-22-8-DP.² It is the EEO Officer's duty to oversee the communication of the existence of Metro's EEO Policy and program to employees, applicants, and potential applicants by the dissemination of the EEO Policy internally and externally. Dissemination occurs at least annually. The dissemination of policy will occur through the following means:

Internal Dissemination

- Written communication from the General Manager;
- Posting of official EEO materials (e.g., Federal and state labor law posters and Metro's policy statement in conspicuous and accessible locations (e.g., on bulletin boards, near time clocks, in employee breakrooms and in employment/personnel offices);
- The inclusion of the EEO policy statement in employee handbooks and manuals;
- Meeting with top management officials (e.g., the General Manager, operations, human resources, communications, planning, marketing, etc.) at least semiannually to present and discuss the EEO Program and its implementation;
- Meeting with Metro's EEO/AA Advisory Committee members, as well as existing affinity groups to seek input on program implementation;
- Conducting regular EEO training for employees and leadership;
- Conducting EEO training for all new supervisors or managers within 90 days of their hire or appointment;
- Presentation of the EEO program as part of employee orientation/training programs; and
- Inclusion of the EEO policy statement in core agency policies or strategic plans.

External Dissemination

- Including a statement that Metro is an equal employment opportunity employer in all recruitment postings, including online at King County's portal at [governmentjobs.com](https://www.governmentjobs.com);
- Dissemination of Metro's EEO Policy and Statement wherever there is outreach or advertising to recruitment entities (e.g., employment agencies, educational institutions, and minority and women's organizations) as well as entities which regularly refer applicants such as employment agencies, hiring halls, unions, educational/training institutions, and minority, people with disabilities, women's and civil rights organizations and community action groups;
- Public media sources including those oriented to women, minorities, and people with disabilities; and
- Statements in advertisements that King County is an Equal Employment Opportunity/Affirmative Action Employer.

² Attachment 2, EEO Policy, PER-22-8-DP, Section 6 at page 4.

Designation of Personal Responsibility

The work of ensuring equal employment opportunity for all individuals is a complex undertaking. Metro recognizes that it will take cooperative and co-creative efforts across our entire workforce to make that a reality. As such, specific staff have been delegated the responsibility to ensure that the EEO Program and the underlying work of equity in the workforce continues.

General Manager

As General Manager of Metro, Terry White is responsible and accountable for implementing Metro's EEO Program. It is Mr. White's responsibility for designating appropriate personnel to oversee, administer, implement, and monitor Metro's EEO Program. The General Manager may also serve as the EEO Officer in events of conflict.

EEO Officer

To ensure effective implementation of this Plan, including high-level management, program design, preparation, monitoring, and complaint investigation, the General Manager has appointed Christopher Bhang as EEO Officer for Metro. Mr. Bhang reports directly to the General Manager and acts with the General Managers Authority with all levels of management, labor unions and employees.³ Mr. Bhang has over a decade of civil rights law experience and is trained in EEO law, investigations, mediation and negotiation, and administrative procedure.

The EEO Officer and the Office are separate and apart from other Metro agencies (including the King County Department of Human Resources) and do not present conflicts of interest. In specific instances where conflicts of interest, actual or perceived, do arise, the role of EEO Officer will be appropriately reassigned for that purpose, or an outside investigator may be hired. To further maintain independence, impartiality, and integrity of its investigations and duties, the EEO Office receives separate legal counsel and advice from within the Prosecuting Attorney's Office.

The EEO Officer's responsibilities, include, but are not limited to:

- Developing and recommending EEO policy, a written EEO program, and internal and external communication procedures;
- Assisting management in collecting and analyzing employment data, identifying problem areas, setting goals and timetables and developing programs to achieve goals;
- Designing, implementing, and monitoring internal audit and reporting systems to 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 managers and supervisors to ensure the policy is understood;
- Concurring in the hiring and promotion process;
- In conjunction with human resources, periodically reviewing employment practices policies, complaint policies, reasonable accommodation policies, performance evaluations, grievance procedures, and union agreements;

³ Attachment 2, Metro Organization Chart, showing EEO Officer reporting directly to the General Manager. See also Attachment 5, EEO Policy, PER-22-8-DP, Section 5.6 at page 3.

- Reporting at least semiannually to the General Manager on progress of each section in relation to the agency’s goals, including but not limited to contractor and vendor compliance;
- Serving as a liaison between the agency, federal, state, and local governments, regulatory agencies, and community groups representing minorities, women and persons with disabilities and others;
- Maintaining awareness of current EEO laws and regulations, and ensuring the laws and regulations affecting nondiscrimination are disseminated to responsible officials;
- Investigating employment discrimination complaints;
- Providing and/or ensuring the provisions of EEO training for employees and managers;
- In conjunction with human resources, advising employees and applicants of available training programs and professional development opportunities and entrance requirements; and
- Auditing postings for Metro’s EEO policy statement to ensure compliance information is posted and up to date.⁴

All Employees

In addition to the duties of the EEO Officer, all Metro employees, including executives, management, and supervisory personnel share in the responsibility for effective implementation and monitoring of Metro's EEO Policy and Program within their respective areas and will be assigned specific tasks to ensure compliance is achieved. These EEO responsibilities for agency officials, managers, and supervisors include:

- Holding regular discussions with other managers, supervisors, and employee and affinity groups to assure the agency’s policies and procedures are being followed;
- Maintaining and updating the personnel database(s) to all generation of reports required for the nondiscrimination program;
- Cooperating with the EEO Officer and other staff in review of information and investigation of complaints;
- Encouraging employee participation to support the advancement of the EEO Program (e.g., professional development and career growth opportunities, posting promotional opportunities, shadowing and/or mentoring); and
- Implementing County and Metro diversity and inclusion strategies.⁵

⁴ Attachment 2, EEO Policy, PER-22-8-DP, Section 7.1 at page 5.

⁵ Attachment 2, EEO Policy, PER-22-8-DP, Section 7.2 at page 6.

Workforce and Utilization Analysis

This section provides an overview of the demographics of Metro’s workforce, specifically focusing on gender and minority status⁶, in accordance with FTA requirements.⁷ The FTA and EEOC divide the workforce into the following eight EEO categories, and will be referred to throughout this report:

1. Officials and Administrators
2. Professionals
3. Technicians
4. Protective Service Workers
5. Paraprofessionals⁸
6. Administrative Support Workers
7. Skilled Craft Workers
8. Service Maintenance Workers

This section also analyzes the Metro workforce for utilization and compares the current workforce of FTEs to the relative availability (otherwise known as the goal placement rate) in the Seattle/King County Metropolitan area. Availability was calculated using census data and a total weighted availability formula. This analysis is done to identify possible underutilization or overconcentration of women or minorities within a job classification and to determine whether limitations or barriers to equal employment opportunities.

When the percentage availability in a certain category is greater than Metro’s actual workforce, and the percent difference represents a whole person, that group is considered underutilized.

⁶ In this Report, Metro uses the terms women and female interchangeably. The Report similarly uses the terms minorities, people of color, and racial groups interchangeably. Metro recognizes that this is not an ideal nor most accurate portrayal of demographics, but a reflection of the mix of reporting sources and requirements of the FTA. See the discussion on more inclusive demographics below.

⁷ Attachment 7, Workforce Analysis by Job Title, 2018-2021.

⁸ Metro does not have employees in the EEO Category 5 for Paraprofessionals; and no longer has positions in EEO Category 4 for Protective Service Workers as of 2020.

Goals and Timetables

Where underutilization is identified, the FTA requires that short and long terms goals be established to achieve representation of the actual available workforce. These goals do not represent quotas or set asides; rather, they affirm Metro’s commitment to reexamining policies and increasing access and opportunity for qualified women and people of color as positions are available.

Previous Submission’s Goals and Timetables

In 2018, Metro submitted its last FTA EEO Program Report and gave an analysis on its workforce ending in December 2017.⁹ In that report, Metro identified the following six groups as underutilized:

- Technicians, Minority (-2.1%)
- Technicians, Women (-31.2%)
- Protective Service Workers, Women (-23.4%)
- Administrative Support Workers, Women (-0.7%)
- Skill Craft Workers, Women (-4.2%)
- Service Maintenance (-5.7%)

By 2021, all categories identified in the 2018 report remained underutilized with the exception of Women in Protected Services as Metro no longer has employees in that category, and an additional group was identified as underutilized: Minorities in the Officials and Administrators category. See table below for a summary of underutilized classes.¹⁰

EEO Category	2017	Current Workforce Analysis			
		2018	2019	2020	2021
1 - Minorities		-19.2%	-14.1%	1.6%	-3.9%
3 - Women	-2.1%	-5.1%	-5.9%	-17.1%	-17.7%
3 - Minorities	-31.2%	-28.8%	-29.9%	-30.7%	-20.9%
4 - Women	-23.4%	-56.8%	-56.8%	N/A	N/A
6 - Women	-0.7%	-1.0%	-1.2%	0.6%	-0.6%
7 - Women	-4.2%	-5.4%	-6.8%	-8.0%	-7.0%
8 - Women	-5.7%	-5.5%	-5.8%	-5.1%	-5.6%

As noted above, the years 2018-2021 represent years of transition, change, and challenge: Metro’s conversion and reorganization from a division to a department, changes to the General Manager and EEO Officer positions, and maintaining transportation services amidst the COVID-19 pandemic. While these unprecedented circumstances presented definite challenges in meeting its EEO placement and utilization goals, Metro remains committed to expanding equal employment opportunities for its employees by working to enhance the resourcing and visibility of the EEO Office and the important role it plays in protecting civil rights and fostering a diverse workforce.

⁹ Attachment 4, Previous EEO Program Report and Goals and Timetables, 2018.

¹⁰ For the full list of classes and analysis, see Attachment 9, Utilization Analysis, Goals and Timetables, 2022-2025.

Current Goals and Timetables

In order to achieve a workforce that reasonably reflects availability, Metro has identified six groups that are underutilized and provides timetables to achieve its parity goals over the next four-year reporting period, 2022-2025.¹¹ For those groups, a planning percent increase (and actual number of employees to be added) is divided as goals over the next four years. A summary of each underutilized group is provided here:

- **Officials and Administrators, Minorities.** This category has seen a marked improvement in utilization for minorities, improving to 3.9% underutilization from 19.2% in 2018, and was positive in 2020. The 3.9% equates to one person necessary to achieve parity with the available workforce.
- **Technicians, Women and Minorities.** In the Technicians EEO category, both women and minorities are underutilized at 17.7% and 20.9%, respectively. This represents a significant increase of underutilization for women from 2.1% in 2017, but a slight decrease for minorities from 31.2% in 2017. To achieve parity, five women and six minorities would be needed and an increased utilization of 3.5% to 7% a year for both categories over the next four years.
- **Administrative Support Workers, Women.** Women are slightly underutilized in the Administrative Support Workers category at 0.6%, and in 2020, women were not underutilized. To achieve parity, the number of women would have to increase by one.
- **Skilled Craft Workers, Women.** Women have consistently been underutilized in the skilled craft category, with underutilization increasing from 4.2% in 2017 to 7.0% in 2021. To achieve parity, 58 women would need be added at an increased utilization of 1.65% to 2.4% over the next four years.
- **Service Maintenance Workers, Women.** Women have also consistently been underutilized in the Service Maintenance category, with underutilization holding around 5.5% over the last five years. To achieve parity, 167 women would need to be added at an increased utilization of 1.4% over the next four years.

¹¹ Attachment 9, Utilization Analysis, Goals and Timetables, 2022-2025.

Employment Practices

The following is a summary of Metro’s current employment practices.¹² The practices are identified as possible areas that may contribute to the success of achieving the short and longer-term goals described above. Metro recognizes that change to employment practices takes time and strategic thinking with an organization of its size; but is committed to making those “long-game” strategies a reality for our customers, employees, and future employees.

Recruitment and Selection

Metro has taken concrete steps to embed nondiscrimination and equity principles in recruitment and selection policies and procedures. In 2016, Metro introduced a standardized process for recruitment and selection applicable to all competitive recruitments. Through this standardization, Metro ensures each recruitment process:

- Reviews EEO goals and areas of opportunity;
- Follows guidelines for posting and advertising openings to reach potential applicants from a broad range of backgrounds, including underrepresented communities;
- Has qualifications aligned to a job analysis with a focus on removing non-essential requirements that may restrict the applicant pool;
- Includes of King County’s EEO statement on all job postings;
- Offerings applicant the opportunity to request reasonable ADA accommodations in the evaluation process;
- Reviews any testing steps to ensure relevance to qualifications and test validation;
- Selects an interview panel with diverse representation and ensuring completion of mandatory training in identifying and mitigating bias in interviews; and
- Makes anti-bias and nondiscriminatory interview techniques a standard part of the preparing for interviews.

Metro has also adopted the [Equity and Social Justice Strategic Plan](#), including goals and minimum standards related to non-discrimination, equity and social justice, diversity and inclusion, and utilization of the Hiring Toolkit.

Metro has allocated 2022 resources to evaluate and revise its Talent Acquisition processes: from recruitment planning through completion of probationary periods of newly hired employees. This work will also evaluate EEO concurrence requirements, ensuring the Talent Acquisition process is standardized and fully compliant with all county and FTA requirements.

Metro is developing creative ways to expand opportunities to technical apprenticeships positions that would increase visibility to apprenticeship positions by partnering with community organizations that serve women, people of color, and other underrepresented protected categories.

¹² Attachment 10, Statistical Analysis by EEO Category.

Additionally, in 2022, the EEO Office will conduct an investigatory review of its historical hiring policies practices of women within the Vehicle Maintenance Section, which predictably has an underutilization of women in its workforce.

Staff Training and Development in the Recruitment Process

Prior to beginning a recruitment, Metro meets with hiring managers to review the selection process and ensure the posted job duties and qualifications align with the classification requirements. Each member of Metro HR has been trained to use a standardized selection process that incorporates best practices for equity and transparency

Metro provides training to managers performing subject matter expert reviews of all applications to ensure selection is based on relevant criteria and justifications are provided for each decision based on competitiveness. In recruitments for supervisory level positions, additional steps are taken to ensure a “blind review” of applications with personal information redacted.

All interview panelists are required to complete training in person or online focused on eliminating bias in the interview process. Metro audits each interviewer proposed by hiring managers to ensure they have completed training before serving on a panel. Before each interview, Metro HR/ES goes over the interview process and best practices with the panelists using a set of common guidelines.

For supervisory positions, additional steps are taken to train interview panelists in competency-based interviews, with critical qualities and experience identified and agreed on in advance. Interviews for supervisory positions are facilitated by trained staff to ensure selection is based on the agreed-upon qualities and to help guide scoring discussions.

Job Analysis

Job analyses are reviewed periodically when a position’s duties have evolved, or a new classification is being considered. Job announcements are regularly checked against the classification descriptions to ensure qualifications and duties are aligned. Under King County guidelines and collective bargaining agreements, employees have a clear and transparent process to request a classification review if they believe duties or qualifications are not aligned appropriately.

Testing

Any testing used in Metro’s recruitment process is validated for the position. Transit uses testing developed in-house primarily for hands-on and practical examinations for skilled craft positions. For example, a prospective mechanic may be asked to perform basic journey-level tasks one would be expected to perform on the job. Likewise, a candidate applying for a customer service position may be asked to interpret a timetable and answer questions to evaluate ability to provide customers with route information.

Testing is most commonly used as a pass/fail step in the selection process, with applicants meeting a threshold score before moving on to interviews. The threshold score is determined in advance with hiring authorities and results are usually tabulated automatically. In cases of hands-on testing, the work

performed is evaluated by a panel of subject matter experts with scoring based on predetermined standards.

Promotional and Transfer Opportunities

Vacant positions are posted and filled in accordance with applicable King County Personnel Guideless, except as otherwise provided in applicable collective bargaining agreements. In those cases, Metro promotional and transfer processes may be limited to certain represented employees.

Metro is also committed to providing an open and transparent process for lateral movement and temporary “special duty assignments” for employees to continue their development. Opportunities for these assignments are advertised through email, employee newsletters and bulletins, and posted in print at job sites for employees who do not have access to email. Lateral and special duty assignments are offered to help employees who may not meet a classification’s minimum qualifications gain additional experience and prepare for continued advancement.

Training

Metro offers a robust selection of online training programs for employees via its eLearning platform. Some eLearning courses are required by King County including “Preventing Sexual Harassment in the Workplace” (required for all new County employees hired after April 2017) and “Countering Bias in Interviewing” (required for all members of hiring panels since 2016). The Countering Bias training is in the process of being updated.

In 2021, Metro began the process of building a learning development team that is focused on creating a healthy workplace culture. The trainings offered include leadership development, Anti-discrimination training for people leaders and the entire Metro workforce, Understanding Sexual Assault Dynamics & Trauma-Informed Response, and trainings focused on King County/Metro values and priorities. Metro also offers program and resources to foster promotional potential and workforce development, including multiple apprenticeship programs, the Supervisors-in-Training program, Leadership Excellence and Development, and Career Support Services Transit Employee Resource Center.

Compensation and Benefits¹³

Metro administers compensation in accordance with King County [Personnel Guidelines, Chapter 6 – Pay Plan](#). The County’s schedule of pay ranges consist of ninety-nine pay ranges, each containing ten steps as approved by ordinance, subject to changes in compensation negotiated in applicable collective bargaining agreements. King County’s [Classification and Compensation program](#) is responsible for maintaining, monitoring, and updating compensation and classifications.

The County’s [Benefits Payroll and Retirement Office](#) administers the County’s benefit plans in accordance with the King County [Personnel Guidelines, Chapter 13 – Health Benefits](#), state and federal laws and regulations, and any applicable provisions of collective bargaining agreements.

¹³ Salary information for each of the EEO Categories for men and women are provided in Attachment 10, Statistical Analysis by EEO Category.

Discipline Procedures

Disciplinary actions for employee misconduct are governed by [King County Code 3.12.270](#) and [Personnel Guidelines, Chapter 16 – Discipline](#). Discipline is also subject to applicable provisions of collective bargaining agreements. The County’s Department of Human Resources also provides [further guidance](#) on the consultation, referral, and notification procedures for the imposition of disciplinary action.

Involuntary terminations include layoff, termination for failure to complete training programs, non-disciplinary medical terminations, failure to pass probation, and discharge for misconduct. Layoffs and recall are also addressed by applicable collective bargaining agreements.

Moving Towards More Inclusive and Accurate Demographics

While Metro embraces the workforce and utilization analysis as an opportunity to encourage the advancement of women and people of color in its workforce, it recognizes that the demographics metrics used here are incomplete and do not adequately reflect the diversity of its workforce. Having a better and more complete understanding of its workforce will allow Metro to develop the strategies necessary to make meaningful advancements in its EEO Program.

The EEO Office recognizes that gender is not a binary and acknowledges that members of our work force can identify and exist outside of these categorical constraints of female and male, including transgender women, transgender men, and non-binary individuals.

People with disabilities have also largely been excluded from this analysis and Report. Their lived experiences have not been properly given venue by which the EEO Office can make informed decisions to combat systemic ablism and make the workforce a welcoming place for people with disabilities.

The Office also recognizes that its current efforts to understand and collect data on people with disabilities and veterans are incomplete and not reliable sources of information, particularly for people with disabilities. Because of the stigma of disability in the workplace, the percent of employees who disclose disability is often an underrepresentation of the actual number of in the workforce or applicant pool.

In its commitment to equity, building and supporting a diverse workforce, and continuing the spirit of the civil rights movement, the EEO Office will work with Metro’s Employee Services and Equity, Inclusion, and Belonging teams to ensure our next submission’s metrics truly reflect our workforce and values.

Monitoring and Reporting Systems

EEO Monitoring

Metro uses multiple sources of data and information systems to monitor the components of this EEO Report, including:

- NeoGov – King County’s applicant portal and tracking system
- PeopleSoft – King County’s human resources information and online training platform
- People Fluent and CAAMS – King County’s workforce management systems
- Oracle BI Insights – King County’s financial and personnel analytics system

Subrecipient and Contractor EEO Compliance

Metro’s EEO Policy states that subcontractors are required “to provide proof of the existence of an EEO program which meets the required program elements.”¹⁴

The City of Seattle Department of Transportation (SDOT) is the only subrecipient or contractor that meets the threshold for submission and monitoring of an EEO Program. SDOT’s EEO Program is included as Attachment 5 to this Report and has been reviewed by the EEO Office.¹⁵ Metro’s EEO Officer is working with SDOT’s [Office of Equity and Economic Inclusion](#) to ensure both entities are in compliance with EEO law and cooperatively advance opportunities for their workforces. The two Offices met on February 17, 2022 to confirm review Seattle’s EEO Report and share strategies for developing strong EEO programming.¹⁶

Review of Union Contracts

The King County Office of Labor Relations is the designated bargaining agent for collective bargaining for Metro. There are several parts of the collective bargaining process, first of which is to develop overarching priorities and issues to be addressed during collective bargaining. King County and Metro, commit to developing proposals with an equity mind set. This means that the County and Metro are not only looking to ensure that our new proposals do not have a disparate impact, but also evaluating existing contract language and processes to determine if there are areas of the contract that need to be changed to eliminate disparate impact. During the proposal development process, there are specific discussion about areas of the contract that could/need to be changed, for example – the disparate impact of seniority and looking to be more inclusive in creating internal job growth opportunities. These efforts are done in concert with Metro and the Office of Labor Relations.

In addition, the Office of Labor Relations presents and consults with the King County Department of Human Resource Director and the Chief Equity & Inclusion Officer for King County when developing bargaining priorities and strategies throughout the bargaining process. King County Office of Labor Relations follows the [King County Council Labor Policy](#). Both the King County Office of Labor Relations and King County Metro have commitments to equity and social justice in their stated values.

¹⁴ Attachment 2, EEO Policy, PER-22-8-DP, Section 7.3 at page 6.

¹⁵ Appendices for SOT’s EEO Program are omitted. The full report can be access [here](#).

¹⁶ Outlook Calendar notice confirming meeting is also included in Attachment 5.

Monitoring EEO Complaints and Allegations

All Metro employees and applicants have the right to report allegations of discrimination, harassment, retaliation, and inappropriate conduct under the Nondiscrimination, Anti-Harassment & Inappropriate Conduct Policy and Metro’s EEO Policy. Potential complainants should notify Metro’s EEO Office, Workforce Equity Manager, or HR manager to file a report.

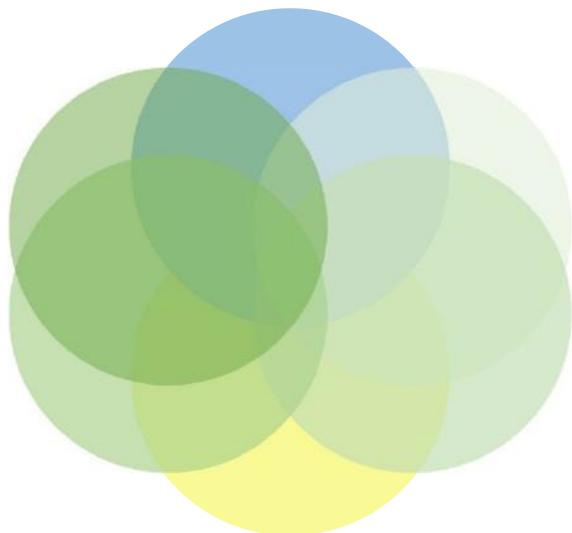
Regardless of the source or first point of contact where it was first reported, all matters are directed to the EEO Office for intake, data collection, and monitoring. The EEO maintains a log of all complainants, the basis of the complaint, protected class, date of contact, date of resolution, name of the investigator, and how the matter was resolved.

Upon receipt of a complaint, the EEO Office will conduct an intake process to determine jurisdiction. If warranted, the EEO Office will complete a thorough and impartial investigation in accordance with [EEOC Guidance](#). When the investigation is complete, the EEO Office will complete a report of its findings and make appropriate recommendations based on those findings.

Coordination Team

Recently, the EEO Office began convening a Coordination Team comprised of leadership from EEO, Employee Services, Transit Employees Labor Relations, Human Resources, Equity, Inclusion, and Belonging, and division leadership when appropriate. The purpose of this group is to increase transparency and visibility of EEO’s functions (including investigation) and ensure coordination to bring effective resolution to both individual and systemic issues identified by the EEO Office through its complaint monitoring and investigations.

In this Team, the EEO Office serves as the central entity that receives and collects complaints and allegations of violations of EEO law and the County’s Nondiscrimination, Anti-Harassment & Inappropriate Conduct Policy. The Office provides factual records from investigations and data to help inform the Coordination Team in the development of appropriate action to complex issues that arise in the workplace. The EEO Office maintains its independence to conduct impartial investigations, and it is not involved in actions that would make it a witness or party to future investigations. The following provides a visual of how the EEO Office and Coordination team work together:



EEO receives all reports of alleged discrimination, conducts independent fact-finding investigations, provides recommendations for action pre and post investigation to Coordination Team.

Coordination Team provides expertise in addressing workplace conflict from multiple perspectives: racial equity, risk management, employee safety, and alignment with County policy and procedures.

Division Leadership is invited to meet with the Coordination Team, as necessary, to strategize appropriate measures that can be taken to address the workplace conflict.

To Make a Complaint or Report Discrimination

Posting and information on how to contact the EEO Office to make a complaint or report discrimination is found throughout Metro as described in the Dissemination section above. Employees and applicants can contact the EEO Office (see contact information below). Metro is also developing a new reporting mechanism through a secure online portal that allows greater access and ease of reporting.

Metro EEO Office

201 S Jackson St.
KSC-TR-0415
Seattle, WA 98104-3856
MetroEEO@kingcounty.gov
(206) 477-9454

Employees are also informed that they have the right to file complaints of employment discrimination to entities outside of Metro:

- **The King County Civil Rights Program in the Office of Equity and Social Justice.** The Civil Rights Program enforces the [King County Fair Employment Practices Ordinance, KCC 12.18](#) in unincorporated areas of King County and when King County is the employer.

(206) 263-2446
Civil-Right.ORC@kingcounty.gov
<https://kingcounty.gov/elected/executive/equity-social-justice/civil-rights/civil-rights-complaint.aspx>

- **The Washington State Human Rights Commission.** The Commission investigates discrimination in employment across the entire state of Washington, including King County.

1 (800) 233-3247
<https://www.hum.wa.gov/file-complaint>

- **The Equal Employment Opportunity Commission.** The EEOC enforces and investigates federal civil rights law in employment. Complaints may be made to the Seattle Field Office.

1 (800) 669-4000
<https://www.eeoc.gov/field-office/seattle/location>

Agency Reporting

The EEO Officer meets at least quarterly with the General Manager to discuss the progress of Metro's EEO Program, the results of monitoring, and cases involving violations of EEO law and the Nondiscrimination Policy. The Coordination Team, comprised of leadership from Human Resources, Equity, Inclusion, and Belonging, Employee Services, and Transit Employee Labor Relations, meets at least weekly to discuss follow up actions to EEO findings and matters. Other follow up actions may include discussions with individual managers, division leadership, the Strategic Leadership Team and the Expanded Management Team.

Metro is also required to report the progress of its EEO program and results of its monitoring to King County's Human Resources' Workforce Equity team for annual reporting and updates to [King County's EEO/AA Plan](#). Metro employees and leadership, including the General Manager, also participate in the County's EEO/AA Advisory Committee in furtherance of Metro EEO efforts and goals.



King County Metro Transit Department EEO Office

201 S Jackson St. | Seattle, WA 98104-3856

(206) 477-9454 (TTY Relay 711)

MetroEEO@kingcounty.gov

www.kingcountny.gov/depts/transportation/metro

www.kingcountymetro.blog