

# Attachment 1: EEO Policy Statement



## King County Metro Transit (Metro) Equal Employment Opportunity

### Policy Statement

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 Equal Employment Opportunity (EEO) goals will benefit Metro and any applicable sub-recipients and/or 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.

**Michelle Allison**  
General Manager, King County Metro Transit (Metro)

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](mailto:MetroEEO@kingcounty.gov)

Phone: 206-477-9454

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.

October 17, 2025

Date

To request this information in your native language, please email [MetroEEO@kingcounty.gov](mailto:MetroEEO@kingcounty.gov) or call 206-477-0454.

**Spanish** - Para solicitar esta información en Español, sírvase llamar al [MetroEEO@kingcounty.gov](mailto:MetroEEO@kingcounty.gov) o envíe un mensaje de correo electrónico a 206-477-0454.

**Chinese** - 如果要索取本資訊的中文版, 請致電 [MetroEEO@kingcounty.gov](mailto:MetroEEO@kingcounty.gov) 或發電郵給 206-477-0454.

**Vietnamese** - Để có các thông tin này bằng tiếng Việt, xin gọi số [MetroEEO@kingcounty.gov](mailto:MetroEEO@kingcounty.gov) hoặc gửi điện thư đến 206-477-0454.


**Somali** - Si aad u weyddiisato inaad ku hesho macluumaadkan Af-Soomaali, fadlan wac [MetroEEO@kingcounty.gov](mailto:MetroEEO@kingcounty.gov) ama iimayl u dir 206-477-0454.

Attachment 2:  
Metro EEO Policy,  
PER-22-8-DP



**King County  
Department Policies and Procedures**

**King County**

Title Equal Employment Opportunity Policy King County Metro Transit King County, Washington	Document Code No. PER-22-7-DP
Department/Issuing Agency King County Metro Transit (Metro)	Date As signed Replaces August 25, 2015, PER-1-1 (D-P)
Approved  Rob Gannon, General Manager	Date signed 20 FEB 2018

1.0 SUBJECT TITLE: Equal Employment Opportunity Policy

1.1 EFFECTIVE DATE: As signed

1.2 TYPE OF ACTION: Update

1.3 KEY WORDS/PHRASE: (1) Equal Employment Opportunity, Non-Discrimination

2.0 PURPOSE:

2.1 In addition to the specific elements contained in this policy, in order to overcome the effects of past discrimination on minorities and women, Metro is committed to King County's affirmative action program, including its goals and timetables. Metro's commitment is predicated on the fact that successful achievement of EEO goals will benefit Metro and any applicable sub-recipients and/or contractors through fuller utilization and development of previously underutilized human resources.

3.0 ORGANIZATIONS AFFECTED: King County Metro Transit

3.1 This policy applies to all employment actions and practices, including but not limited to, recruitment, hiring, selection for training, promotion, termination, transfer, demotion, layoff, termination, rates of pay and all other forms of compensation including, benefits, and all other terms and conditions of employment.

#### 4.0 REFERENCES:

- 4.1 References: King County Code 3.12.330
- 4.2 King County EEO/AA Plan (as updated and/or revised)
- 4.3 King County Administrative Policy & Procedure PER 22-3-3 Non-Discrimination and Anti-Harassment Policy & Procedure
- 4.4 FTA Circular 4704.1A

#### 5.0 POLICIES:

- 5.1 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/or contractors through fuller utilization and development of previously underutilized human resources.
- 5.2 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.
- 5.3 In addition to the specific elements contained in this policy, Metro is committed to any affirmative action plan adopted by King County, including its goals and timetables.
- 5.4 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 his/her designee, the King County Human Resources Director or his/her 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.

- 5.5 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.
- 5.6 Metro's General Manager, maintains 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, Metro's General Manager has appointed the following as Metro's EEO Officer who reports directly to the General Manager and acts with the General Manager's authority with all levels of management, labor unions and employees:

Anita L. Whitfield  
King County Metro Transit EEO Officer  
KSC-TR-0415  
201 S. Jackson Street, Suite 415  
Seattle, WA 98104

E-mail: Metro – [Equity@kingcounty.gov](mailto:Equity@kingcounty.gov)  
[Anita.whitfield@kingcounty.gov](mailto:Anita.whitfield@kingcounty.gov)

Phone: 206-205-8000  
206-477-2669

- 5.7 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.
- 5.8 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.

6.0 PROCEDURES:

Action By:  
Transit EEO Officer

Action:

6.1 – Under the oversight of Metro’s EEO Officer, Metro will communicate the existence of its EEO policy and program to employees, applicants and potential applicants by dissemination of its EEO policy internally and externally. As part of Metro’s EEO Plan/Program, internal dissemination shall occur through:

- 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. operations, human resources, planning, marketing, etc.) at least semiannually to 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 periodic EEO training for employees and managers
- Conducting EEO training for all new supervisors or managers within 90 days of their appointment
- Presentation of the EEO program as part of employee orientation/training programs
- Inclusion of the EEO policy statement in core agency policies or strategic plans

As part of King County’s EEO Plan/Program, external dissemination shall occur through:

- Including a statement that Metro is an equal employment opportunity employer in all recruitment ads (e.g. newspapers, magazines, websites and social media)

- Dissemination of Metro's EEO policy 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, minority and disabled populations
- Statements in advertisements that King County is an Equal Employment Opportunity/Affirmative Action Employer

Dissemination shall occur at least annually.

## 7.0 RESPONSIBILITIES:

7.1 Metro Transit's EEO Officer is given lead responsibility for implementation and coordination of its EEO program and execution of associated EEO policies.

7.1.1 Specifically, Metro Transit's EEO Officer shall be responsible for:

7.1.1.1 Developing and recommending EEO policy, a written EEO program and internal and external communication procedures

7.1.1.2 Assisting management in collecting and analyzing employment data, identifying problem areas, setting goals and timetables and developing programs to achieve goals

7.1.1.3 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

7.1.1.4 Reviewing the agency's nondiscrimination plan with all managers and supervisors to ensure that the policy is understood

7.1.1.5 Concurring in the hiring and promotion process

7.1.1.6 In conjunction with human resources, periodically reviewing employment practices policies, complaint policies, reasonable accommodation policies, performance evaluations, grievance procedures, and union agreements

7.1.1.7 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

- 7.1.1.8 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
- 7.1.1.9 Maintaining awareness of current EEO laws and regulations, and ensuring the laws and regulations affecting nondiscrimination are disseminated to responsible officials
- 7.1.1.10 Investigating employment discrimination complaints
- 7.1.1.11 Providing and/or ensuring the provision of EEO training for employees and managers
- 7.1.1.12 In conjunction with human resources, advising employees and applicants of available training programs and professional development opportunities and entrance requirements
- 7.1.1.13 Auditing postings of Metro's EEO policy statement to ensure compliance information is posted and up to date

7.2 In addition, all Metro Transit management personnel share in the responsibility to assure compliance with the EEO program and policies.

7.2.1 Specifically, EEO responsibilities for agency officials, managers and supervisors shall include:

- 7.2.1.1 Holding regular discussions with other managers, supervisors and employees and affinity groups to assure the agency's policies and procedures are being followed
- 7.2.1.2 In conjunction with the EEO Officer, maintaining and updating the personnel database(s) to all generation of reports required for the nondiscrimination program
- 7.2.1.3 Cooperating with the EEO Officer and other staff in review of information and investigation of complaints
- 7.2.1.4 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)
- 7.2.1.5 Implementing County and Metro diversity and inclusion strategies.

7.3 Should Metro Transit subcontract with applicable subcontractors, such subcontractors shall be required to provide proof of the existence of an EEO program which meets the required program elements.

# Attachment 3: List of Metro Locations

## Metro Bases, Facilities, and Buildings where EEO Materials are Posted

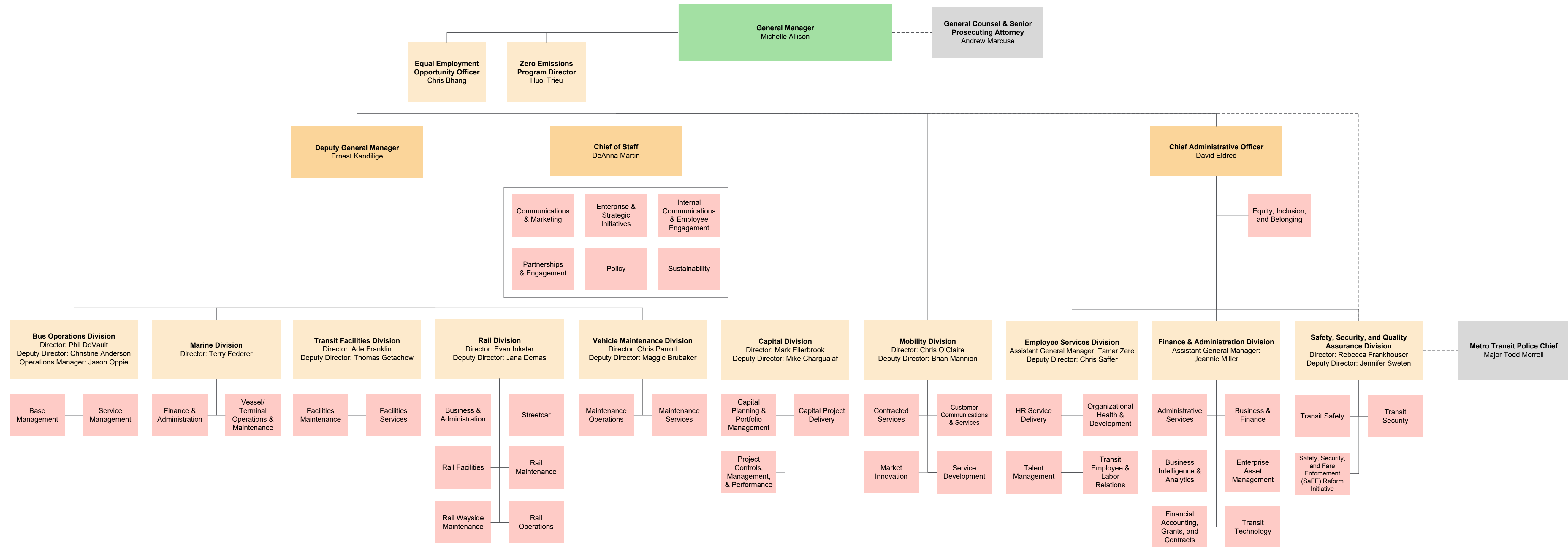
	Metro Facility	Address
1	Atlantic Base Operations	1500 6th Ave S, Seattle, WA 98134
2	Atlantic Vehicle Maintenance	1555 Airport Way S, Seattle WA 98134
3	Bellevue Base Operations	1790 124th Ave NE, Bellevue, WA 98005
4	Bellevue Base Vehicle Maintenance	1790 124th Ave NE, Bellevue, WA 98005
5	Central Base Operations	1500 6th Ave S, Seattle, WA 98134
6	Central Facilities Maintenance	1301 Airport Way S., Bldg 3, Seattle, WA 98134
7	Central Vehicle Mainenance	640 S Massachusetts, Seattle, WA 98134
8	Component Supply Center	12200 E Marginal Way S, Tukwila, WA 98168
9	Component Supply Center Supply Chain?	12200 E Marginal Way S, Tukwila, WA 98168
10	East Base Operations	1975 124th Ave NE, Bellevue, WA 98005
11	East Base Vehicle Maintenance	1975 124th Ave NE, Bellevue, WA 98005
12	First Hill Streetcar	848 7th Ave S, Seattle, WA 98134
13	Fleet VM/Annex	12119 East Marginal Way, Tukwila, WA 98168
14	Information Distribution Warehouse	1523 6th Ave S, Seattle, WA 98134
15	King Street Center	201 S Jackson St, Seattle, WA 98104
16	Link Light Rail/Operation and Maintenance Facility (OMF-C)	3407 Airport Way South, Seattle, WA 98134
17	Link Light Rail/Operation and Maintenance Facility (OMF-E)	1899 120th Ave NE, Bellevue, WA, 98005
18	Marine Vessel Maintenance Facility (Pier 48)	201 Alaskan Way S, Seattle, WA 98104
19	Marine Vessel Operations/Passenger Ferry Terminal (Pier 50)	801 Alaskan Way, Seattle, WA 98104
20	Non-Revenue Vehicles (NRV)	1301 Airport Way S, Seattle, WA 98134
21	North Base Maintenance	2160 N 163rd St, Shoreline, WA 98133
22	North Base Operations	2160 N 163rd St, Shoreline, WA 98133
23	North Facilities Maintenance	12525 Stone Ave N., Seattle, WA 98133
24	Power Distribution	2255 4th Ave South, Seattle 98134
25	Revenue Processing Center	1500 6th Ave S, Bldg 2, Seattle WA 98134
26	Ryerson Base Operations	1220 4th Ave S, Seattle, WA 98134
27	Ryerson Base Vehicle Maintenance	1220 4th Ave S, Seattle, WA 98134
28	Safety (Greybar Building)	416 Occidental Ave, Suite 220, Seattle, WA 98104
29	Service Quality	1500 6th Ave S, Seattle WA 98134
30	South Base Operations	12100 E Marginal Way S, Tukwila, WA 98168
31	South Base Vehicle Maintenance	12100 E Marginal Way S, Tukwila, WA 98168
32	South Construction Field Office	11911 E. Marginal Way S., Bldg B Tukwila, WA 98168
33	South Facilities	11911 E. Marginal Way, Bldg C., Tukwila, WA 98168
34	South Lake Union Streetcar	318 Fairview Ave N, Seattle, WA 98034
35	System Impacts	1500 6th Ave S, Seattle WA 98134
36	Training	3401 S Norfolk St, Seattle, WA 98118
37	Transit Control Center (TCC)(D&A collection center)	1263 6th Ave S, Seattle, WA 98134
38	Tukwila Base Operations	12400 E Marginal Way South, Tukwila, WA 98168
39	Tukwila Base Vehicle Maintenance	12400 E Marginal Way South, Tukwila, WA 98168
40	Van Distribution Center	18655 NE Union Hill Rd, Redmond, WA 98052

Current as of December 2025

# Attachment 4: Metro Organizational Chart

# Department Structure

*For orientation purposes only – not for staffing, business or financial decision making.*



**Attachment 5:  
Nondiscrimination, Anti-  
Harassment and  
Inappropriate Conduct Policy**

## Nondiscrimination, Anti-Harassment & Inappropriate Conduct Policy & Reporting Procedures

Policy Number: 2021-0012  
 Issue Date: 07-02-2021  
 Replaces: 2018-0001

### POLICY

King County is committed to maintaining a respectful, productive, inclusive, and equitable workplace. Therefore, all elected officials and employees are expected to act with fairness, civility, integrity and to treat all coworkers equitably. Discrimination, harassment, retaliation, and inappropriate conduct based on a protected status undermines the integrity of the employment relationship and is prohibited. All complaints of conduct inconsistent with these expectations, regardless of whether the conduct rises to the level of unlawful discrimination, harassment, or retaliation, will be addressed. King County will determine the appropriate response to all complaints, which may include a formal investigation. Substantiated complaints will result in prompt, corrective action, up to and including termination of any employee violating this policy.

King County prohibits discrimination or harassment that is related to an individual's race, color, sex, age, creed, disability, marital status, national origin, religion, pregnancy, gender, gender identity or expression, genetic information, sexual orientation, veteran or military status, use of a service animal, domestic violence victimization, and any other status protected by federal, state, or local law. Additionally, King County prohibits retaliation of any kind against employees who engage in related protected activity, such as good faith reporting of harassment, discrimination, inappropriate conduct, or retaliation, or assisting in the investigation of such complaints.

### DEFINITIONS

*"Disability"* means a sensory, mental, or physical impairment that: (1) is medically recognized or diagnosable; (2) exists as a record or history; or (3) is perceived by the employer to exist, whether or not it actually exists. A disability exists whether it is temporary or permanent, common, or uncommon, mitigated, or unmitigated, limits the ability to work generally or work at a particular job, or limits any other activity.

*"Discrete Adverse Employment Action"*, in the case of discrimination, means any action that substantially affects the terms, conditions, or privileges of employment. It includes, but is not limited to, discipline, discharge, layoff, and a failure to hire or promote.

- In the case of retaliation, it is an action that would discourage a reasonable employee from making a complaint or participating in a discrimination, harassment or retaliation investigation or proceeding.

*"Discrimination"* means when an employer takes a discrete adverse employment action against an employee and the employee's protected status was a substantial factor in the employer's decision.

- *"Disability Discrimination"* occurs when the employer knows that an employee is unable to perform an essential function of the job due to a disability and fails to provide a reasonable accommodation that would enable the employee to perform the essential function.

*"Harassment"* means unwelcome conduct that can take many forms, including but not limited to, innuendoes, unwelcome compliments, suggestive or insulting noises, facial expressions, vulgar language, nicknames, slurs, derogatory comments, cartoons, jokes, pranks, written materials, offensive gestures or touching, and deliberately misgendering someone. It is illegal when:

- Enduring the conduct becomes a condition of continued employment; or
- The conduct is severe or pervasive enough to create an environment that a reasonable person would consider intimidating, hostile, or abusive.

*“Inappropriate Conduct”* means conduct that, while not rising to the level of unlawful discrimination, harassment, sexual harassment, or retaliation, communicates a hostile, derogatory, unwelcome, or negative message about persons based on a protected status. Inappropriate conduct can be either verbal or nonverbal and includes slights, insults, and other conduct that a reasonable person would find offensive.

*“Protected Status”* means an employee’s sex, age, creed, disability, marital status, national origin, race, color, religion, pregnancy, gender, gender identity or expression, genetic information, sexual orientation, veteran or military status, use of a service animal, domestic violence victimization, engaging in protected activity and any other status protected by federal, state, or local law.

*“Retaliation”* means when a supervisor or manager takes a discrete adverse employment action against an employee because the employee engaged in protected activity, such as good faith reporting of harassment, discrimination, inappropriate conduct, or retaliation, or assisting in the investigation of such complaints. It also occurs when a co-worker engages in retaliatory harassment, if the conduct is sufficiently severe or pervasive.

*“Sexual Harassment”* occurs when unsolicited and unwelcome sexual advances, requests for sexual favors, displays of sexually oriented material, or other verbal or physical conduct of a sexual nature:

- Is explicitly or implicitly made a term or condition of employment;
- Is used as a basis for an employment decision; or
- Unreasonably interferes with an employee’s work performance, or creates an intimidating, hostile or otherwise offensive environment.

Both the victim and the harasser can be the same gender or gender identity.

## **REPORTING PROCEDURES**

### **Reporting Discrimination, Harassment, Retaliation, or Inappropriate Conduct**

If an employee believes that they have been the subject of inappropriate, discriminatory, or harassing conduct based on a protected status, or they have been subjected to retaliation for reporting such conduct, they should report the conduct either verbally or in writing to one of the County’s Human Resources (HR) Managers, the Workforce Equity Manager, or the Equal Employment Opportunity (EEO) Officer for Metro Transit. A report can be made to anyone on the list below; it does not have to be the employee’s department HR Manager.

[List of the current HR Managers, Workforce Equity Manager, and EEO Officer for Metro Transit](#)

Allegations of conduct which violate this policy made against the King County Executive, Assessor or the Director of Elections should be reported to the Department of Human Resources Director.

If an employee feels that their complaint is not being adequately addressed by the managers listed above, please contact the Department of Human Resources Director.

If an employee is concerned that they or another King County employee has been subjected to treatment in violation of this policy and the employee wants to have a confidential discussion about their concerns, please contact the Employee Assistance Program at 206-263-8733, or Making Life

Easier at 1-888-874-7290. These resources offer comprehensive programs and services that help King County employees, and their families, to be healthy and safe.

## **Confidentiality and Public Disclosure**

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All information will be maintained on a confidential basis to the greatest extent possible. However, such information may be subject to disclosure under Washington's Public Records Act, RCW 42.56, and RCW 41.56, or for relevant litigation. Additionally, information may need to be disclosed to employees to carry out the purpose and intent of this policy.

Pursuant to RCW 42.56.250(6), investigative records that involve discrimination, harassment, or related retaliation claims are exempt from public disclosure while an investigation is active and ongoing. Once the investigation has been concluded and the complainant has been notified of the outcome, the records may be disclosed, provided that the names of the following are redacted, unless the following consent to the disclosure of their name:

- the complainant;
- other accusers; and
- witnesses.

## **RESPONSIBILITIES**

### **Responsibilities of All King County Executive Branch Employees and Elected Officials**

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All employees and elected officials in executive branch departments, offices, and divisions, including the Assessor's Office, Elections, and the Sheriff's Office, shall be responsible for:

- Acting professionally and refraining from discriminatory, harassing, retaliatory or inappropriate conduct;
- Becoming familiar with the provisions of this policy, complying with all requirements of this policy, and cooperating with any inquiry under this policy; and
- Promptly reporting, as outlined above, any incident of discriminatory, harassing, retaliatory or inappropriate conduct based on a protected status that they experience or observe. The County cannot correct discriminatory, harassing, retaliatory or inappropriate conduct if the conduct is not known.

Where an inquiry establishes that an employee engaged in discriminatory, harassing, retaliatory or inappropriate conduct based on a protected status, the employee will be subject to appropriate corrective action, up to and including termination.

### **Responsibilities of the Human Resources Managers, the Workforce Equity Manager, and the Equal Employment Opportunity Officer for Metro Transit**

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The HR Managers in executive branch departments, offices, and divisions, the Workforce Equity Manager and the EEO Officer for Metro Transit shall be responsible for:

- Receiving allegations of discriminatory, harassing, retaliatory or inappropriate conduct based on a protected status;
- Advising supervisors and managers on appropriate actions to address alleged or substantiated conduct that violates this policy (e.g., investigation, counseling, education, corrective action);
- As appropriate, promptly conducting or overseeing fair and impartial investigations into allegations of discriminatory, harassing, retaliatory or inappropriate conduct based on a protected status;

- Advising supervisors and managers on interim actions, as needed, to ensure retaliation or other misconduct does not occur pending the outcome of an investigation;
- Communicating with the complaining party about the status of the investigation, what the complainant should do if they feel that they are being retaliated against for making a complaint under this policy, the resolution of the investigation, and what actions will be taken, if applicable;
- Advising the relevant division and/or department director about allegations of discriminatory, harassing, retaliatory or inappropriate conduct based on a protected status and the resolution of those allegations under this policy;
- Providing the Department of Human Resources Director, the Department Director, and the Division/Office Director with quarterly reports on complaints filed under this policy and the outcome of investigations; and
- Documenting the allegations received and the steps taken to address them.

### **Responsibilities of Supervisors and Managers**

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All supervisors and managers in executive branch departments, offices, and divisions, including the Assessor's Office, Elections, and the Sheriff's Office, shall be responsible for:

- Receiving allegations of discrimination, harassment, retaliation or inappropriate conduct based on a protected status and handling complaints promptly and appropriately;
- Acting promptly and appropriately to prevent discrimination, harassment, retaliation, or inappropriate conduct in the workplace. This includes using sound judgment in determining the appropriate corrective actions. In some situations, the appropriate corrective action may be immediate supervisory actions, such as counseling the offending employee. If unsure the supervisor should consult with their HR Manager.
- Consulting with their HR Manager if there are concerns or questions about whether a particular situation rises to the level of a policy violation;
- Reporting to their HR Manager, the Workforce Equity Manager, or the EEO Officer for Metro Transit any alleged incident of discrimination, harassment, retaliation or inappropriate conduct based on a protected status, that they witness or is otherwise brought to their attention;
- In consultation with the HR Manager, Workforce Equity Manager or EEO Officer for Metro Transit, providing interim actions, as needed, to ensure that retaliation or other misconduct does not occur pending the outcome of an investigation;
- In consultation with the HR Manager, Workforce Equity Manager or EEO Officer for Metro Transit, taking prompt and appropriate corrective and disciplinary action, up to and including termination, against employees who have engaged in discriminatory, harassing, retaliatory or inappropriate conduct based on a protected status or who have not carried out their responsibilities under this policy; and
- Actively monitoring the workplace to ensure compliance with this policy. A supervisor or manager who knew or should have known about harassment, discrimination, retaliation, or other inappropriate behavior in the workgroup and failed to report it to their department's HR Manager, may be subject to corrective action, up to and including termination.

### **Responsibilities of Division and Department Directors**

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All directors in executive branch divisions and departments, including the Assessor's Office, Elections, and the Sheriff's Office, shall be responsible for:

- Acting promptly and appropriately to prevent and address discrimination, harassment, retaliation or inappropriate conduct in the workplace;
- In consultation with the HR Manager, Workforce Equity Manager or EEO Officer for Metro Transit, ensuring that interim action is provided, as needed, to ensure that retaliation or other misconduct does not occur pending the outcome of an investigation; and
- In consultation with the HR Manager, Workforce Equity Manager or EEO Officer for Metro Transit, taking prompt and appropriate corrective and disciplinary action, up to and including termination, against employees who have engaged in discriminatory, harassing, retaliatory or inappropriate conduct based on a protected status or who have not carried out their responsibilities under this policy.

### **Consequences of Non-Compliance**

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Any employee, manager, supervisor, HR Manager, Workforce Equity Manager, EEO Officer, or Division or Department Director found to have failed to properly carry out the responsibilities outlined above, shall be subject to appropriate corrective action, up to and including termination.

### **ADDITIONAL RESOURCES & AVENUES FOR REPORTING AVAILABLE TO EMPLOYEES**

**King County Civil Rights Program**, Office of Equity, Racial and Social Justice, <https://kingcounty.gov/elected/executive/equity-social-justice/civil-rights.aspx>

The enforcement unit of the Civil Rights Program investigates and resolves complaints of discrimination, provides education, and offers technical assistance. They work as impartial factfinders and do not represent any party.

**Washington State Human Rights Commission**, <https://www.hum.wa.gov/>

**U.S. Equal Employment Opportunity Commission**, <https://www.eeoc.gov/>

# Attachment 6: EEO Investigation Procedures and Handbook

# 2025 Investigation Procedures and Handbook (Second Edition)

King County Metro Equal Employment Opportunity Office

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# Introduction

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The King County Metro Equal Employment Opportunity (EEO) Office is proud to present the second edition of its Investigative Procedures and Handbook (Handbook). The EEO Office is grateful for the contributions from Metro's employees, division leadership, Metro Human Resources, Transit Employee Labor Relations, Metro's Equity Inclusion and Belonging team, DHR's Workforce Equity division, and all its other partners throughout the County in creating a document that elevates the civil rights of all Metro employees.

The purpose of this Handbook is to provide the EEO Office and the Metro workforce a transparent framework by which it receives, investigates, and analyzes allegations of protected class-based misconduct. With the procedures and legal standards articulated in this Handbook, the EEO Office is taking a step to build trust and demystify what happens when someone files a complaint of discrimination and the role the EEO Office has in driving change at Metro.

The EEO Office has the unique responsibility of providing independent and impartial oversight over all of Metro's employment practices as mandated by the Federal Transit Administration (FTA). The EEO Office, under the direction of the EEO Officer, has an affirmative responsibility to ensure that employees have equal employment opportunities and to prevent discrimination, retaliation, and harassment in the workplace.

A part of that responsibility includes conducting fair and impartial investigations of alleged instances of discrimination, harassment, and retaliation under Federal laws (EEO laws) and the King County Nondiscrimination, Anti-Harassment & Inappropriate Conduct Policy & Reporting Procedures, Policy Number 2021-0012, PER 22-3-3 (Policy). This Handbook does not cover any of the data reporting responsibilities or other non-investigative EEO Program requirements of the EEO Office. For more information on Metro's EEO Plan, see [here](#).

This Handbook should be updated annually to reflect changes in applicable law, policy, and regulations, and to be responsive to the operational and administrative needs of Metro and its employees. Questions and suggestions for improving this document should be directed to the EEO Office.

# EEO Office – Mission, Vision, and Values

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## Mission

To protect Civil Rights and advance equity for all King County Metro employees.

## Vision

A Metro free of discrimination where everyone can professionally grow and thrive, regardless of who they are and the identities they hold. The Metro EEO Office will do its part to keep our region moving by providing Metro employees and leadership trustworthy information and data to drive equitable employment decisions and policies.

## Values

**Equity.** We name and acknowledge that racism, sexism, ableism, transphobia, homophobia, and xenophobia are real, systemic maladies that are rooted in our nation’s long history and practices of legal segregation, discrimination, and colonization. The knowledge of the intersecting past and present effects of these “isms” inform our future work.

**Expertise in Civil Rights Law.** We celebrate that Civil Rights laws are monumental achievements of our society, fought for by countless leaders and martyrs of justice, including our County’s namesake, the Rev. Dr. Martin Luther King, Jr. We honor their memories with sophisticated expertise in the equal and unbiased application of these laws.

**Compassion.** We listen to the voices and stories of those affected by discrimination with empathy and compassion, regardless of the merits of their allegations. And as a neutral party to these matters, we similarly will treat those alleged to have violated policy or law with equal respect and compassion, knowing that investigations can be a difficult process to experience, and never assuming wrongdoing or intent.

**Transparency.** We practice transparency in our processes, knowing that true transparency leads to accountability. We will strive to ensure that the Metro workforce knows about our policies and procedures in investigations, compliance with federal law, and Metro’s EEO Plan. We invite engagement and critique that leads to positive change and innovation.

**Cooperation.** We acknowledge that we are part of a larger structure, where partnership with other departments, leadership, and employees is crucial to translating the information and data we provide into meaningful action. While the EEO Office shall operate as independently as possible and free from outside influence, we value the expertise and cooperation of the many talented professionals throughout King County in doing what is just and equitable.

## Chapter 1

# General Investigative and Legal Principles

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# General Investigative and Legal Principles

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## I. The Purpose of an Investigation

The purpose of an investigation is to build a factual and evidentiary record to determine whether alleged violations of EEO law<sup>1</sup> or policy occurred. It is important that the investigations be conducted in a fair and neutral manner so that all parties involved in the investigation can trust and rely on the investigative findings. Investigations balance the need to take seriously the concerns of the person raising the allegations of wrongdoing (the Complainant) with the fairness and process due to the person being accused (the Respondent).

The FTA tasks the EEO Officer with monitoring and advancing equitable employment practices and affirmatively preventing discrimination, harassment, and retaliation. The EEO Officer may approach specific allegations of discrimination as part of a larger pattern or practice of discrimination and may also consider information and data that may not otherwise be considered in other investigations (previous EEO complaints against the same person or division, for example).

During an investigation, the EEO Officer, acting through the EEO Office and its investigators, will provide appropriate leadership and departments information that may be important to prevent on-going discrimination or future retaliatory acts, or to address immediate and emergent issues.

At the conclusion of an investigation, the Complainant and Respondent(s) will be informed of the outcome, and the EEO Office will provide Metro leadership written reports of its findings so that appropriate action can be taken. The responsibility to act on the information and reports provided by the EEO Office remains with the appropriate Metro division and departments, as to not make the EEO Office, Officer, or staff a witness or party to any future complaints.

## II. Protected Classes and Protected Activities

For the EEO Office to conduct an investigation, the allegations of discriminatory behavior must be based on a person's protected class or having engaged in a protected activity for retaliation cases.

EEO law<sup>2</sup> and the Policy protect employees from discrimination on the basis of **protected classes**, which are certain things about a person that they cannot nor should be asked to change. Generally, under EEO laws, protected classes include race, color, religion, national origin, sex, disability, age, and genetic information. In this context, sex includes pregnancy, childbirth, gender identity, and sexual orientation.<sup>3</sup>

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<sup>1</sup> Including Title VI of the Civil Rights Act of 1964, Title VII of the Civil Rights Act of 1964, as amended by the Equal Employment Opportunity Act of 1972 and Civil Rights Act of 1991, Title II of the Genetic Information Nondiscrimination Act, Title I of the Americans with Disability Act, the Equal Pay Act of 1963, the Age Discrimination in Employment Act of 1967, Sections 501 and 505 of the Rehabilitation Act, and the Uniformed Services Employment and Reemployment Rights Act of 1994.

<sup>2</sup> FTA Circular 4704.1A, 2.2.3. For information on the EEO Office's non-investigative duties, please see Metro's EEO Policy Statement and EEO Plans [here](#).

<sup>3</sup> *Hegwine v. Longview Fibre Co., Inc.*, 132 Wash.App. 546 (2006).

The Policy, on the other hand, defines protected status to include an employee’s “sex, age, creed, disability, marital status, national origin, race, color, religion, pregnancy, gender, gender identity or expression, genetic information, sexual orientation, veteran or military status, use of a service animal, domestic violence victimization, engaging in protected activity and any other status protected by federal, state or local law.”<sup>4</sup>

In retaliation cases, a person must have engaged in a **protected activity** to be covered by EEO law or the Policy, regardless of their protected class. A protected activity can include, but is not limited to, making a complaint of discrimination, opposing discriminatory behavior or practices, participating in an EEO investigation as a party or a witness.<sup>5</sup>

### III. Differences Between EEO Laws and the Policy

While similar in their purpose and scope, there are key differences between EEO laws and the Policy.

EEO laws are based in civil rights laws and come with decades worth of instructive case law by which to analyze different situations and allegations. Case law refers to how courts have interpreted written law, providing an analytical and logical framework from which the EEO Office can base its investigations. Case law will be found throughout this Handbook, with the case name in italics followed by information on when and which court made the decision. The EEO Office is required to receive complaints of and investigate alleged violations of these laws.

The Policy, on the other hand, is an internally developed policy with specific applicability to the King County enterprise and workforce. The Policy makes an important distinction between violation of the Policy and illegal acts of discrimination, that not all violations of the Policy will constitute illegal discrimination, with illegal discrimination having a higher standard.

#### a. Case Law, EEO Laws, and Application to the Policy

Case law provides the EEO Office a well-established and predictable framework by which it analyzes different allegations. Where EEO laws are similar to the Policy, the EEO Office will employ the reasoning and standards established in case law. The case law and research in this document, Particularly Chapter 4, are limited to published Washington State courts, 9th Circuit, and U.S. Supreme Court decisions. Federal administrative decisions and non-Washington cases are cited only in the absence of applicable case law for guidance purposes.<sup>6</sup>

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<sup>4</sup> The final phrase “any other status protected by federal, state or local law” requires special attention given the breadth of what is encompassed. For example, in the City of Seattle’s Fair Employment Practice Ordinance, political ideology is also a protected class. SMC 14.04.020(A). Also, in the King County Charter, family caregiver is a named protected class. King County Charter, Section 840. In both examples, neither provides definitions nor is there established case law to analyze such claims. If these allegations based on these or other untested protected classes arise, contact the PAO for legal advice.

<sup>5</sup> See Chapter 4, Types of Discrimination, Retaliation.

<sup>6</sup> However, it should be noted that Washington Courts are not bound by Federal Law. *Glasgow v. Georgia-Pacific Corp.*, 103 Wash.2d 401 (1985); *Davis v. Department of Labor and Industries*, 94 Wash.2d 119 (1980).

#### IV. The Prima Facie Case and Analysis

The EEO Office will investigate and analyze allegations using a prima facie case analysis, used by many other investigative agencies, including the Equal Employment Opportunity Commission (EEOC), United States Department of Housing and Urban Development (HUD), Seattle Office for Civil Rights, the Washington State Human Rights Commission, and the King County Civil Rights Program. This provides a transparent and uniform way by which allegations of discrimination are analyzed.

Prima facie elements are facts that must be established in a case of discrimination and will differ depending on the kind of discrimination alleged. A prima facie case cannot be established without each element being supported by the evidentiary record. For a list of all kinds of discrimination and their respective elements, see Chapter 4, Types of Discrimination, below.

To establish a prima facie case, the EEO Office must receive enough evidence or information from a Complainant.<sup>7</sup> This means that the EEO Office will review the information provided by the Complainant at the intake stage to determine whether the prima facie elements for a claim have been satisfied.

##### a. Burdens of Proof and Evidentiary Standards

To start an investigation with the EEO Office, the Complainant has the “[initial] burden of establishing *specific and material facts* to support each element of their prima facie case.”<sup>8</sup> At the start of an investigation, the Complainant needs to sufficiently state facts that meet each of the prima facie elements that would lead to an investigation.<sup>9</sup>

The burden of proof, that is, the burden to produce evidence and to persuade, can shift between the Complainant and Respondent(s) in cases of discrimination based on circumstantial evidence when a Complainant lacks “direct evidence of discriminatory animus.”<sup>10</sup> This analysis is often referred to as the McDonnell Douglas burden shifting analysis.<sup>11</sup>

##### b. Preponderance of the Evidence

Determinations in investigations by the EEO Office are based on a *preponderance of the evidence*, meaning a greater than 50 percent probability, or “more likely than not.” This is the widely recognized standard for workplace investigations, as well as for civil cases. During an investigation, the burden is on the Complainant to demonstrate that *all* the prima facie elements and allegations of their claim have been satisfied by a preponderance of the evidence. In factual findings and cases of inappropriate conduct, the preponderance of the evidence standard is used to determine if a certain fact or allegation occurred. The EEO Office’s investigations do not require the Complainant to personally establish the facts of their case. The EEO Office acts as a fact finder to gather evidence that may support those facts but does not act

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<sup>7</sup> If unchallenged, the prima facie case is generally sufficient for the Complainant’s allegations to prevail in an investigation. See Part IV. a, Burdens of Proof and Evidentiary Standards.

<sup>8</sup> *Hiatt v. Walker Chevrolet Co.*, 120 Wash.2d 57, 66 (1992).

<sup>9</sup> See Chapter 3, Part III, Intake.

<sup>10</sup> *Hill v. BCTI Income Fund-I*, 144 Wn2d 172, 180 (2001).

<sup>11</sup> *McDonnell Douglas Corporation v. Green*, 93 S.Ct. 1817, 1820 (1973).

as an advocate nor pursue unreasonable or specious leads that a personal attorney or other advocate may have pursued.

### c. Burden Shifting

When a Complainant has established a prima facie case of discrimination, an inference of discrimination has been established. In cases where there is no direct evidence of discrimination, the burden of proof then shifts to the Respondent to articulate some “legitimate, nondiscriminatory reason” for the alleged discriminatory act. A Respondent need not prove their legitimate, nondiscriminatory reason; rather, articulating the response is sufficient to rebut the Complainant’s prima facie case.

If the Respondent articulates a legitimate, non-discriminatory reason, the burden again shifts back to the Complainant to demonstrate by a preponderance of the evidence that the legitimate, nondiscriminatory reasons was **pretext** – or as the *McDonnell* Court called it, “a coverup for a [] discriminatory decision.”<sup>12</sup> If pretext is established, an inference that the allegations occurred as alleged may be made; however, an investigator may also find that the pretextual reasoning was given for a different reason, such as covering up facts.<sup>13</sup>

In cases of direct discrimination, burden shifting is not appropriate. For example, if the allegation is that a supervisor used a racial slur, no burden shifting is necessary if the evidence shows that the slur was used. Put another way, in cases of direct discrimination, there is no legitimate, non-discriminatory reason for why the alleged behavior occurred.

### d. Reasonable Person Standard

In many cases involving the Policy’s provision on inappropriate conduct and retaliation, the reasonable person standard is applied. This standard is used to determine whether a reasonable person in the same situation would find certain conduct harassing, offensive, or would be dissuaded from engaging in a protected activity or asserting their civil rights.

## V. Jurisdiction

Jurisdiction is the authority to take action in certain circumstances depending on the subject matter (what is being alleged) and who the parties to the investigation are.

All matters having to do with protected class-based discrimination, harassment, retaliation, and inappropriate conduct at Metro are within the EEO Office’s subject matter jurisdiction. While the Policy states that Complainants may report to other entities such as Human Resources (HR), it is Metro’s practice that all these matters are reported to both the EEO Office and HR, with the EEO Office having discretion to retain matters for investigation.

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<sup>12</sup> *McDonnell Douglas Corporation v. Green*, 93 S.Ct. 1817, 1826 (1973).

<sup>13</sup> See EEOC Guidance on Retaliation and Related Issues, [https://www.eeoc.gov/laws/guidance/enforcement-guidance-retaliation-and-related-issues#\\_ftn4](https://www.eeoc.gov/laws/guidance/enforcement-guidance-retaliation-and-related-issues#_ftn4)

For the EEO Office to have personal jurisdiction, the Respondent must be an employee (current or former) of Metro. A Complainant may be a current or former employee, applicant, or potential applicant for a position with Metro.

It should be stressed that just because the EEO Office has jurisdiction to investigate, does *not* mean that a division or other Metro agency need to stop their own processes in maintaining operations or addressing workplace issues. Real-time employment and workplace decisions should be made without advice or interference by the EEO Office, and divisions should make these decisions in consultation with HR, Transit Employee Labor Relations (TELR), and the Prosecuting Attorney's Office (PAO), as appropriate.

#### **a. Contractors**

Independent contractors are protected by the Policy and are also subject to the Policy.

While contractors are *not* considered employees covered by Title VII and other EEO laws; just because a Respondent or Metro asserts that an individual is a contractor does not necessarily mean that they are. In *Murray v. Principal Financial Group, Inc.*, 613 F.3d 943 (9th Cir. 2010), the Ninth Circuit adopted the following factor test adopted from *Nationwide Mutual Insurance Company v. Darden*, 112 S.Ct. 1334 (1992):

[1] the skill required; [2] the source of the instrumentalities and tools; [3] the location of the work; [4] the duration of the relationship between the parties; [5] whether the hiring party has the right to assign additional projects to the hired party; [6] the extent of the hired party's discretion over when and how long to work; [7] the method of payment; [8] the hired party's role in hiring and paying assistants; [9] whether the work is part of the regular business of the hiring party; [10] whether the hiring party is in business; [11] the provision of employee benefits; and [12] the tax treatment of the hired party.

#### **b. Types of Employees**

The EEO Office investigators make no distinction between full time employees, career service employees, represented or non-represented employees, probationary employees, temporary and term-limited employees, employees on special duty assignment, or intermittent employees. All are considered employees for the EEO Office's investigations.

#### **c. Pregnancy, Sexual Orientation, Gender Identity**

Discrimination based on pregnancy, gender identity, or sexual orientation are analyzed within a sex discrimination framework and are under the jurisdiction of the EEO Office.<sup>14</sup> Pregnancy is specifically protected under the Pregnancy Discrimination Act (an amendment to Title VII) that protects on the basis of pregnancy childbirth, or related medical conditions. Pregnancy related medical conditions may require a temporary disability accommodation analysis.<sup>15</sup>

##### **i. The Pregnancy Workers Fairness Act**

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<sup>14</sup> *Hegwine v. Longview Fibre Co., Inc.*, 132 Wash.App. 546 (2006).

<sup>15</sup> See Chapter 4, Types of Discrimination.

The Pregnant Workers Fairness Act (PWFA), requires a covered employer to provide a reasonable accommodation to a qualified employee's or applicant's known limitations related to, affected by, or arising out of pregnancy, childbirth, or related medical conditions, unless the accommodation will cause the employer undue hardship. Examples of reasonable accommodations under the PWFA are: (1) additional, longer, or more flexible breaks to drink water, eat, rest, or use the restroom; (2) changing equipment, devices, or workstations, such as providing a stool to sit on, or a way to do work while standing; (3) changing a work schedule, such as having shorter hours, part-time work, or a later start time; (4) telework, and more. The PWFA effectively makes it easier for pregnant persons to receive certain reasonable accommodations through a less invasive interactive process.

## **VI. Conflicts of Interest**

The EEO Officer and the investigators must remain neutral and impartial to all investigative matters and must operate free of conflicts of interest – actual or perceived. Current or former relationships, professional or personal, with any parties to an investigation must be disclosed to the Investigations Manager or EEO Officer. A determination will be made as to whether the assigned investigator or other EEO staff (including the EEO Officer) has a conflict and should not be involved in the matter. If a conflict is identified that individual shall not be a part of that investigation. Similarly, if a conflict becomes apparent during an investigation, it should immediately be disclosed to the Investigations Manager or EEO Officer.

In cases where the EEO Officer is the subject of an investigation or has a conflict of interest regarding the matter, the same procedure above will apply. The EEO Officer shall disclose to the General Manager the nature of the conflict and the General Manager will decide if the EEO Officer's recusal is necessary. By default, Metro's General Manager is the EEO Officer in these cases, and may designate an alternative, interim EEO Officer depending on the circumstance.

## **VII. Confidentiality**

### **a. Personal Information**

The EEO Office and its staff will regularly review and retain information and documents that contain highly sensitive and personal information. While *completed* investigations are subject public record requests, the EEO Office shall not share any details of an investigation unless there is legitimate need to know. Personal details, such as someone's personal address or medical information, should never be disclosed to parties outside of the EEO Office or an investigation.

If the EEO Office is asked for documents or information (potentially sensitive or otherwise), the requestor should be referred to make a public records request so that the information can be appropriately redacted.

EEO Office staff shall not keep investigative materials on their personal desktop, SharePoint, One Note, or any unsecured electronic location for indefinite periods of time. Use of personal technology and cell phones for EEO business and investigations is prohibited. All investigative files should be kept on the EEO's secured drive, accessible only to EEO staff. Emails communications and attached documents may still exist in an employee's County email server, but if the messages or attachments are downloaded, they should be kept on the secured server.

### **b. Witnesses**

During an investigation, the EEO Office may need to interview witnesses who have been identified as having personal knowledge of the allegations listed within the formal complaint. During the investigation, the EEO Office will not share with parties or division leadership who it has chosen to interview to protect the privacy of witnesses. Further, the EEO Office does not list the names of witnesses in its findings and instead refers to witnesses by their job title or other identifier.

#### **VIII. Compliance with KCC 2.15**

EEO Office staff will work and complete investigations in compliance with KCC 2.15, the Citizenship and Immigrant Ordinance. EEO Office staff will not require any individual to provide information regarding their citizenship and/or immigration status to file a report, request assistance, or otherwise participate in any process facilitated by the EEO Office. EEO Office staff will not request or seek to obtain information regarding the citizenship and/or immigration status of anyone involved in an EEO investigation, unless necessary to the case (discrimination based on national origin, or verification of employment eligibility for examples).

EEO Office staff will also not provide personally identifiable information, including citizenship and/or immigration status, to any individual or agency outside of King County unless so required by law, regulation, or court order.

## Chapter 2

# Metro Partners and the Coordination Team

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# Metro Partners and the Coordination Team

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Properly addressing workplace issues and civil rights matters often requires the expertise, assistance, and authorities of other County and Metro Partners. This Chapter summarizes how the EEO Office will work with other County and Metro divisions and agencies in ways that are effective, prioritize workplace safety and well-being, and still allows the EEO Office to operate as a neutral party and independent fact finder.

## I. Partner List

The following is a list of County partners that may contribute to successful resolution of a matter or act as a resource for the EEO Office and the Parties.

**Division Directors and Leadership.** Division Directors and their leadership teams see to the vital day-to-day operations of Metro. They must be informed when an investigation has commenced and when it has come to an end. Their partnership is also vital in ensuring investigations do not interfere with operations and that the proper chain of command is informed and apprised of the EEO Office's work for reasons ranging from scheduling interviews, mass communication to their division, and reducing the risk of retaliation or the appearance of retaliation.

**Employee Services.** Metro's Employee Services works in partnership with Metro leadership to build a highly motivated and high-performance workforce. Employee Services develops and implements human resource strategies, policies, and procedures on a variety of HR matters including performance management, leave management, workplace conflict, position management, employment investigations, and classifications. The following partners are some of the divisions of Employee Services:

**Disability Services.** Transit Disability Services (TDS) at King County Metro is committed to assisting Metro Transit employees with disabilities in their workplace during their employment by providing reasonable accommodations under Title I of the Americans with Disabilities Act. TDS provides a resource through its understanding of the interactive and reasonable accommodation processes. Employees who have not yet started an interactive process should be referred to TDS. If you need to contact TDS' general email, you can email them at [transitdisabilityservices@kingcounty.gov](mailto:transitdisabilityservices@kingcounty.gov).

**Department of Human Resources and Business Partners.** Metro, like most other large departments of the County, has its own dedicated staff for HR matters but still reports ultimately to the head of DHR at the County. HR Managers and Business Partners apply county policy and assist divisions in navigating traditional HR matters such as: accommodations, leave and benefits, application of the Personnel Rules, and discipline. Business Partners also provide guidance to division leadership and employees on whether a matter is potentially a violation of the policy. If you need to contact the Human Resources Business Partners' general email, you can email them at [MetroHRBP@kingcounty.gov](mailto:MetroHRBP@kingcounty.gov). If you need to contact Metro's HR Manager, you can contact [Metrohrmanager@kingcounty.gov](mailto:Metrohrmanager@kingcounty.gov).

**Organizational Health and Development.** The Organizational Health and Development (OHD) team works with Metro employees and divisions on a number of matters including training and education. OHD developed Metro’s The Way We Work Together campaign that explains the procedures for reporting discrimination and harassment according to the Policy. If you need to contact OHD’s general email, you can email them at [MetroOHD@kingcounty.gov](mailto:MetroOHD@kingcounty.gov)

**Transit Employee Labor Relations.** The Transit Employee and Labor Relations (TELR) section has the responsibility of assisting with and advising on the administration of the various collective bargaining agreements that represent King County Metro’s employees. TELR provides the EEO Office knowledge of how to comply with contractual labor agreements and acts as a liaison of sorts to the Unions. The TELR Manager is a member of the Coordination Team. TELR is also responsible for responding to complaints filed by the EEOC. See below for information on how EEO Office works with Unions and TELR during investigations, Part II. c. If you need to contact TELR’s general email, you can email them at [transit.laborrelations@kingcounty.gov](mailto:transit.laborrelations@kingcounty.gov).

**Equity Inclusion and Belonging.** The Equity Inclusion and Belonging Team (EIB) provides Metro vital resources in addressing complex workplace issues and supporting employees with a strong focus on a racial and intersectional equity analysis. The EIB team and EEO Office were once part of the same division and should continue to work closely together to align and advance civil rights and equity. If you need to contact EIB’s general email, you can email them at [MetroEIB@kingcounty.gov](mailto:MetroEIB@kingcounty.gov)

**General Manager’s Office.** The EEO Office is a part of the General Manager’s Office (GM’s Office) and the EEO Officer reports directly to the GM per the FTA Circular. Under the Metro EEO Policy, the EEO Officer acts with the GM’s authority with all levels of management, labor unions, and employees. The GM’s Office should be apprised of all investigative reports. The GM also acts as the EEO Officer in the event of conflict and may assign EEO duties as necessary.

**Metro Transit Police.** The King County Metro Transit Police Department is committed to providing safe and accessible transit for all members of the community. Transit Police are a part of Metro’s ongoing mission to creating a mobility system that gives everyone an opportunity to thrive.

**Office of Equity, Racial and Social Justice.** The Office of Equity, Racial and Social Justice (OERSJ) is an office under the executive and houses the County’s Civil Rights Program. OERSJ is the county coordinator for Title VI of the Civil Rights Act and Title II of the ADA and is responsible for the enforcement of the King County Civil Rights Ordinances and the Citizenship and Immigrant Ordinance. OERSJ has jurisdiction over discrimination matters in County employment including at Metro if the complaint is filed under KCC 12.18, Fair Employment Practices Ordinance.

**Office of the Ombuds.** The Ombuds manages complaints from the public concerning King County government agencies. The Ombuds also investigates employee complaints of improper governmental action, whistleblower retaliation, and alleged violations of the Employee Code of Ethics. The Ombuds operates as an independent office within the legislative branch of King County. The Ombuds do not investigate discrimination or protected class-based matters; however, there may be situations where parallel investigations would benefit from collaboration. If you need to contact the Ombud’s general email, you can email them at [ombudsmail@kingcounty.gov](mailto:ombudsmail@kingcounty.gov).

**Safety and Security.** The Safety and Security team covers a broad range of functions at Metro, including responding to reports of violence, vandalism, and other safety matters that affect both riders, the public, and employees.

**Workforce Equity.** Workforce Equity is a division of the County’s Department of Human Resources. This team ensures an inclusive and diverse workforce throughout King County. This includes helping to implement workplace practices which align with the King County Equity and Social Justice (ESJ) Strategic Plan and delivering services that allow each employee to thrive.

Workforce Equity also supports employees and management by collaborating to provide equity training opportunities, administering the Equal Employment Opportunity/Affirmative Action program, and conducting internal, countywide investigations related to discrimination, harassment, and inappropriate conducts. The Workforce Equity Investigations Manager is also a member of the Coordination Team.

## II. Points of Cooperation

Generally, there are five times where EEO Office investigators must collaborate with other Metro divisions and partners:

1. When interim, preventative, or safety measures are necessary.<sup>16</sup>
2. When no investigation is conducted by the EEO Office but the matter needs referral to another division.
3. When a party is represented by the union during an investigation.<sup>17</sup>
4. When notices of a formal complaint and investigation are sent to the Parties.
5. When requests for information are sent out.<sup>18</sup>
6. After the findings are complete.

Early resolution is not discussed in this Chapter. Please see Chapter 3, Part V and Part VII below for case closure and procedures for pursuing early resolution with the parties.

### a. Interim and Preventative Measures

At any time during the intake or investigative process, certain interim and preventative measures may be appropriate and necessary to prevent or stop on-going discrimination or retaliation or the appearance of retaliation.

While the EEO Office cannot compel Metro management to take specific action, the EEO Office will inform the appropriate partners of the possible need for interim or preventative measures during the investigation. For instance, it may become evident that a Complainant continues to be mistreated by the supervisor they complained about, so the EEO Office should alert the appropriate partners who may decide to change the Complainant’s supervisor during the investigation, depending on the situation. The EEO Office may also alert Metro management of the possibility or the appearance of actual retaliation.

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<sup>16</sup> See Parts II a and b below.

<sup>17</sup> See Subsection (c) below.

<sup>18</sup> See Chapter 3, Part IV.

In these cases, the EEO Office will notify the Coordination Team and other leadership, as appropriate, of the existing dynamics and possible need for interim measures. Action taken after this point will depend on the specifics of the situation. The EEO Office must only relay information to remain a neutral party in the investigative process.

#### **b. Circumstances Involving Potential Criminality or Immediate Safety Concerns**

In matters that involve potentially criminal elements or an immediate danger to someone's safety or property, Safety and Security and Metro Transit Police should be contacted immediately, regardless of the stage of the investigation. Any EEO employee that encounters such a situation, must immediately contact:

- Transit Security & Emergency Management Superintendent and the Director and Chief Safety Officer for Safety, Security & Quality Assurance.
- The Chief of Metro Police, and the Investigations and Operations Captains (contact information [here](#)).
- The EEO Officer and Metro HR Manager should also be cc'd on those communications.

Depending on the circumstances, it may be appropriate for Metro Transit Police or another agency to take over elements of the investigation as matters regarding timeliness and evidentiary custody are more stringent in criminal matters than EEO investigations. The EEO Office will work in cooperation with Safety and Security and Metro Transit Police to prioritize employee and customer safety, including putting investigations in abeyance pending the completion of a criminal investigation.

#### **c. Transit Employee Labor Relations (TELR) and Unions**

Actions taken during or after an EEO investigation must be done in compliance with relevant labor agreements. This section outlines major areas of cooperation between EEO and TELR.

##### **i. Timeline: 90 Days for Investigations**

In alignment with many provisions from collective bargaining agreements, the EEO Office should aim to complete their investigations with 90 days of notice and receipt of a complete and credible complaint. The Coalition Labor Agreement (CLA, formerly known as the Master Labor Agreement) states that if an investigation is expected to go beyond the 90 days, notice must be provided to the parties and union.

The 90 days begins "[w]hen the division or agency director/designee is made aware of a credible allegation of misconduct." Because the EEO Office is designated as responsible for receiving and responding to complaints of discrimination/protected class based inappropriate conduct, the 90 days begins when the EEO Office receives notice of a complete and credible complaint, that is, when the intake process is complete.

**Extensions of the 90 Days for Investigation.** If an investigation is expected to take longer than 90 days to complete from the time the EEO Office received the credible complaint, the EEO Office shall use the extension notice form and send it directly to the employee(s) under investigation and the Complainant. In cases where the Respondent is covered under the CLA, or other union agreement, the notice must also be sent to the TELR Manager who will forward to the appropriate union.

##### **ii. Timeline: 30 Days for Discipline**

Various collective bargaining agreements reference a 30-day requirement to execute discipline after the investigation is completed. The 30 days would start with the finalization of the investigative report by the EEO Officer. To have completely executed the discipline means to have provided the employee either a discipline proposal or have notified the employee that no action will be taken. This also means that any potential discipline must go through King County Metro's standard processes for review prior to presenting the proposed discipline within the 30-day period.

**Extension of the 30 Days for Discipline.** TELR has responsibility for requesting and obtaining agreement from any relevant union for an investigation, as all agreements with unions are managed through TELR. TELR will present a request to the Union, with an explanation of the reason for the extension and will inform the EEO Office and Coordination Team of the outcome as well as provide a copy of the written request and response from the Union.

### iii. EEO and TELR Investigation Assignment and Coordination

TELR will immediately notify the EEO Officer and Investigations Manager when it becomes aware of a situation or allegation of harassment or discrimination based on protected class. The EEO Office will follow its normal process for establishing jurisdiction and will investigate if appropriate. Likewise, the EEO Office will notify the TELR Manager if a labor relations matter arises during an investigation. TELR and the EEO Office will work on these situations on a case-by-case basis to determine the scope that will be investigated by each office.

### iv. Response to External Agency Charges

TELR is responsible for responding to external agency complaints such as the EEOC and the Washington Human Rights Commission for employment matters. Complaints are assigned to specific representatives within TELR. Part of the standard work for TELR is to notify the EEO Office when they have been assigned a complaint so that the EEO Office is aware and can share any relevant information to assist with the response.

The EEO Office has no role in responding to complaints filed by these other agencies. The EEO Office cannot take a defensive role for Metro in responding; but it can provide factual and investigatory assistance if necessary. The EEO Office Project Manager also receives notices of charges filed with the EEOC and Washington State Human Rights Commission and maintains a list of those investigations to cross reference with new incoming complaints.

## III. The Coordination Team

The Coordination Team is a regularly meeting group convened by the EEO Office to discuss matters requiring Metro-wide coordination around matters arising from EEO reports and investigations. The membership is comprised of Metro's EEO Officer, EEO Investigation Manager, Metro's HR Manager, the TELR Manager, Metro's EIB Manager, and the Workforce Equity Investigations Manager. The perspectives from this group are necessary to ensure that these complex workplace issues are examined with all of the following in mind: process and racial equity, HR policies and procedures, alignment with Central HR and Executive priorities, adherence to contractual union obligations, and EEO laws. In addition to racial equity, the Coordination Team will analyze matters through an intersectional lens accounting for gender, disability, sexual orientation, and historical and oppressive power dynamics.

Coordination Team members receive all notices of investigations, closure memos where the EEO Office does not investigate, and investigative findings after an investigation is complete. EEO Investigators frequently brief Coordination Team members on memos and findings.

In addition to serving the logistical function of sharing information and implementing recommendations, the Coordination Team's purpose is to promote transparency and accountability in the EEO's investigative process. In a sort of checks and balances system, the Coordination Team existence ensures that no EEO matter is swept under the rug – regardless of the outcome of an investigation or even if the findings are fully agreed upon. The Coordination Team also ensures that Metro leadership is adequately apprised of matters and issues arising from EEO investigations.

## Chapter 3

# Investigation Procedures & Standards

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# Investigation Procedures

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## I. Receiving Reports

A Complainant's initial report is simply that, a report of an alleged or potential EEO matter. The fact that something has been reported does not mean that any wrongdoing has been committed, nor does it mean an investigation has been launched.

The EEO Office can receive reports from any number of sources, including the EEO email (metroeeo@kingcounty.gov) and phone line (206-477-9454), online surveys and submissions, written letters, or direct contact with an employee in distress. Reports will also come in as referrals from partners in ES, TELR, EIB, and HR. All employees, including directors, managers, superintendents, and base chiefs have been instructed to forward any reports of possible protected class-based discrimination, harassment, or retaliation directly to the EEO Office and HR.

If a matter started in another agency (e.g., the Ombuds or TELR), but over the course of that investigative process it was discovered that protected class-based discrimination occurred or EEO laws were potentially violated, the procedure for receiving and logging the report (see below) remains the same.

While employees can contact individual investigators or EEO staff, directing all reports to the EEO email and phone line is preferable so the EEO Program manager can record the report and create a case file.

## II. Creating Case Files and Triage

When a report comes to the EEO Office, it should be logged in to the EEO Case Management System regardless of the source and assigned a case investigation number. In 2025, the EEO Office will begin utilizing its Case Management system, which will allow the EEO Office to log Complainant reports, assign matters to the correct entity to conduct an investigation of the concern, and collect data to help divisions ensure that they are abiding by EEO laws and find ways to prevent inequity within the workplace. When the EEO Office receives a report, the report should be inputted in the Case Management system immediately upon receiving or discovering the report. At this phase, the report is screened and triaged to the appropriate entity:

- For Metro employment matters: The EEO Office retains the report. The EEO Project Manager should conduct a screening with the Complainant to determine whether the allegations involve an EEO matter that the EEO Office can investigate. If the Complainant has alleged an EEO matter, the Investigations Manager should assign an investigator to conduct an intake with the Complainant and determine whether the EEO Office can investigate the concern or if the concern needs to be referred to a different partner (i.e. HR, TELR, Ombuds Office).
- For public/customer matters involving disability: The report is forwarded to the ADA Title II Coordinator at Metro.
- For public/customer matters involving all other protected classes: The report is forwarded to the Title VI Coordinator at Metro
- For all other matters: The person making the report is referred to an appropriate agency.

Depending on the circumstances, receiving a report and creating a case file may occur at the same time as the Intake.<sup>19</sup>

#### **a. Naming Complainants and Respondents**

A **Complainant** is the individual who has been harmed by the alleged violations of EEO law or Policy. This person may not be the same as the person making the report. Generally, for an investigation to commence, it must have a person who serves as a Complainant, and it is the Complainant's choice to move forward on an investigation. However, certain exceptions may apply where the EEO Office will open an investigation even without the consent of the Complainant.<sup>20</sup> To contact a Complainant, use the initial contact form when contacting a complainant who has made a report.

A **Respondent** is the party alleged to have violated EEO law or the Policy in an investigation. An investigation may commence with an individual respondent, multiple respondents, or Metro as the respondent. In some cases, there may be no identified respondent.

#### **b. If the Reporter is not the Complainant**

Reports will often come from sources that are not directly affected by the alleged discriminatory behavior. For example, directors, chiefs, and superintendents may report something they have heard or was reported to them, or a witness to a discriminatory act may be the reporter.

In such cases, the EEO Office should contact the potential complainant(s) directly using the initial contact form. This letter invites the potential complainant to speak to the EEO Office to better understand the situations through the intake process. The potential complainant is also advised of their rights to file civil rights complaints with the EEO Office and other agencies, informed they are protected from retaliation, and provided additional information and resources.<sup>21</sup>

Sometimes, it may be appropriate to send informational communications to a Complainant's division director, immediate supervisor, and any other involved parties to inform them that the EEO Office has been altered to the matter and will be proceeding with an intake process. The purpose of this communication is to alert the division that the Complainant has engaged in a protected activity and that while no formal investigation has been launched, retaliatory actions are prohibited by law and policy.

#### **c. When the EEO Office Serves as the Complainant**

In certain circumstances, the EEO Office may serve as the Complainant. The EEO Office retains a high degree of discretion to bring forth these cases. The following are common examples of when the EEO Office may initiate an investigation on its own.

- When the matter involves protected class-based discrimination, but there is no identifiable individual or individuals who would be a proper Complainant. Example: vandalism of Metro property with racist imagery.

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<sup>19</sup> See below.

<sup>20</sup> See Subsection (C) When EEO Serves as Complainant.

<sup>21</sup> See Intake below.

- Matters that are part of a documented and/or known pattern of discriminatory behavior. Example: Complainant is the fourth person to come forward in the same week to report the same behavior but does not want to pursue an investigation as the named Complainant.
- Employment data reveals a pattern of potentially discriminatory practices. Example: employment data from a division reveals that all employees that self-identified as having a disability were discharged over the course of 3 years.
- Egregious matters where a victim or affected individual does not wish to affirmatively come forward as a complainant. Examples: sexual assault or an unnecessarily public termination overtly based on a protected class.

#### **d. Individual Respondents**

Where allegations specifically name an individual Metro employee as having engaged in discriminatory behavior, that individual should be named in the investigation. There should be an individual Respondent named in matters alleging inappropriate conduct; but not necessarily so for other matters (see below When Metro is the Respondent). Individuals should not be named because they are the head or director of an agency, unless specific allegations of wrongdoing are raised against them that could result in investigative findings and discipline against them.

In situations with multiple individual Respondents, the EEO Office will determine if separate cases need to be opened depending on the circumstances of the case.

#### **e. When Metro is the Respondent**

In certain circumstances, the EEO Office will name Metro as a Respondent. For example, the EEO Office may name Metro as a Respondent if it is difficult to identify individual Respondents, it is not immediately apparent who the Respondent is, but Metro may be responsible as the employer, or the failures of a system or a department led to the allegations of discrimination (i.e., failure to accommodate a disability.)

In cases where Metro is the Respondent, legal analysis should follow EEO law and case law as it is unclear if the Policy applies to Metro and its divisions. Allegations of inappropriate conduct under the Policy must have a named, individual Respondent, not Metro.

#### **f. If There is No Identifiable Respondent**

Where there is no identifiable Respondent, the EEO Office may still proceed with an investigation. For examples, hate speech, vandalism, or anonymous harassing letters. If during the investigation, it becomes evident that there are potential Respondents, the EEO Office will continue by amending a formal complaint and provide proper notice to the identified Respondent(s).

### **III. Intake**

The purpose of the intake is to ensure the matter is proper for the EEO Office to investigate. During this time, no investigative evidence should be collected except for documents and information provided by the Complainant. After receiving a report, an assigned investigator should contact the Complainant within three (3) to five (5) business days using the initial contact form. Within a timely manner, an investigator should then determine whether the Complainant's allegations can be investigated by the EEO Office.

In some cases, an intake is not necessary because the allegations or events are well-established and clearly matters the EEO Office should proceed to investigate (defacing of Metro property with racist imagery, for example).

During an intake, an investigator shall consider the following to determine if an investigation is proper: (a) the allegations are specific and recognized by law/policy; (b) the allegations are timely; (c) there are no other investigations into the same allegations and circumstances; and (d) the complainant wants a formal investigation with the EEO Office. If any of these four considerations is not satisfied, an investigation is not necessary, and the matter should be closed.<sup>22</sup> If the answer to all four is yes, an investigation is proper, and a formal complaint should be drafted.<sup>23</sup>

**a. Are the Allegations Specific and Recognized by Law and Policy?**

An investigation must be scoped appropriately to ensure consistency in intake and legal analysis. To do so, the EEO Office uses the prima facie element analysis, meaning a Complainant must articulate material facts that meet all the elements of a form of discrimination found in this Handbook for an investigation to begin.<sup>24</sup> A Complainant does not need to specify exactly what kind of discrimination they are alleging. It is the investigator's job to recognize the elements of a potential case. If a Complainant is not able to state specific facts for the EEO Office to investigate as part of their prima facie case, the matter is not proper for investigation.

For example, a Complainant with a disability may say that they have been treated unfairly during a hiring process because of their disability and that they did not get job because of it. An investigator should recognize that the claim here is failure to hire due to disability and possibly a failure to accommodate a disability. Questions should be asked to establish if all the elements of those kinds of discrimination have material elements that can be investigated (was the County put on notice of their disability, were there comparators for who got the position, where in the hiring process they believe they were treated differently, for examples).

**b. Are the Allegations Timely?**

For violations of law or Policy, the EEO Office will generally apply a three-year statute of limitations. However, there are matters of timeliness that may influence whether a full investigation is appropriate, including, but not limited to: if the allegations occurred before 2018 (prior to the Policy's enactment), time passed, fairness to the potential respondent(s), apparent likelihood of finding a preponderance that a violation occurred as alleged; when the Complainant knew or should have known about the discrimination, mootness, availability of evidence, and if the memories of witnesses are in question.

**c. Are There Other Complaints Involving the Same Allegations and Circumstances?**

The Complainant should be asked if they have filed or made complaints with other agencies. If the Complainant has active complaints and/or investigations into the same allegations and circumstances that

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<sup>22</sup> See Subsection (e), Closure after intake, below.

<sup>23</sup> See Part IV.

<sup>24</sup> See Chapter 4, Types of Discrimination.

were reported to the EEO Office, the investigator shall consider if the existing investigation sufficiently protects the Complainant's civil rights; if so, an additional investigation by the EEO Office is not likely proper.

The EEO Office's programming is modeled after the requirements set forth by the Federal Transit Administration's Circular 4704.1A, where the FTA will close or not investigate matters where "[t]he same complaint allegations have been filed with another Federal, state, or local agency and ... that the recipient will provide the complainant with a comparable resolution process under comparable legal standards." Most of these questions will require a case-by-case analysis, except in cases where there is an active lawsuit or claim with the Office of Risk Management, then the EEO Office will not investigate that matter.

For example, if the Complainant has an active complaint being investigated with the EEOC, Complainant's rights are likely upheld by this process. However, if the EEOC declines to investigate, or simply issues a right to sue letter without a determination, the Complainant's case may proceed with the EEO Office, subject to the other considerations of the Intake process.

Cases of allegations of inappropriate conduct may or may not be sufficiently covered by an investigation by an outside entity. Matters involving alleged inappropriate conduct should be analyzed on a case-by-case basis to ensure a Complainant is able to exercise their civil rights.

In another example, if the Complainant has an investigation open with the Ombuds, the Ombuds is likely investigating improper application or adherence to County rules and policies, and *not* from the perspective of a Complainant's protected class. In these cases, it would be appropriate for the EEO Office to investigate the matter from a civil rights perspective. But again, a case-by-case determination is necessary, and an investigator must be able to articulate why they have chosen a path forward.

If the Complainant wants to withdraw other complaints to move forward with an investigation outside of the EEO Office, that is their option. However, it shall be clearly communicated to the Complainant that statutes of limitations and other time considerations (including those from labor agreements) may impact their options moving forward, and that they should consult with an attorney if they have questions and concerns.

#### **d. Does the Complainant Want a Formal Investigation with the EEO Office?**

If all other considerations are satisfied, it is the Complainant's choice to assert their civil rights through an investigative process.<sup>25</sup> The Complainant may still choose not to move forward with a formal complaint. Complainants should always be informed of their option to be referred to a partner for resolution without an investigation. For example, a Complainant may not want an investigation, but an apology or some sort of mediation with management and the potential respondent, in which case a referral to a partner like EIB and HR would be appropriate.

If the Complainant chooses not to move forward with an investigation, they shall be properly referred to HR or other appropriate division, and clearly informed of their rights to proceed with the EEO Office in the future, protections from retaliation, timeliness considerations, and to consult with an attorney if they have

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<sup>25</sup> However, certain exceptions will apply. See Chapter 3, Part II. c, When the EEO Office Serves as the Complainant.  
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questions about asserting their rights. When referred, the EEO Office must communicate to the Complainant that it cannot be involved in any remedial steps to resolve the Complainant's matter. In all cases, the investigator shall inquire and ensure that the Complainant is not making their decision due to coercion or inappropriate influence.

#### **e. Closure After Intake**

If the investigator determines that one of the considerations for investigation has not been satisfied, the investigator shall write an intake memo and explain why no investigation will continue. The EEO Officer or their designee must approve of the memo and rationale.

If the memo is approved, the investigator shall send the Complainant a notice explaining why no formal investigation will be conducted. Where appropriate, the Coordination Team should receive a copy of the intake memo and appropriate partners should be notified of the outcome, including HRBPs and TELR, especially in cases where the matter was referred from them. Intake memos should not be shared with potential complainants for privacy reasons.

### **IV. Formal Investigation**

#### **a. Formal Complaint**

If all intake considerations have been satisfied, the Investigator shall draft a formal complaint. The purpose of this document is to clearly articulate the allegations and mark the start of the EEO Office's investigatory process. The allegations in the formal complaint must align with the Types of Discrimination found in Chapter 4. The formal complaint should be succinct but contain sufficient information to allow a Respondent the opportunity to respond to the allegation(s). This document also explains the role of the EEO Office and other important information for the Parties.

The Investigator shall communicate with the Complainant as necessary to ensure the allegations are accurate and that the Complainant understands that not all the details or information may be included in the formal complaint. The Investigator shall then submit to the EEO Officer and/or Investigations Manager for approval before proceeding to sending notices.

#### **b. Notices**

When the formal complaint has been finalized, the Investigator shall send notices to the Parties informing them that an investigation has begun, their rights, the EEO Office's process, that retaliation is illegal, and other important information. Importantly, this notice provides the Respondent(s) their due process rights by informing them of the allegations against them, their rights, and the opportunity to respond. The notice should include a copy of the formal complaint.

The start date of the investigation is when the formal complaint is approved by the EEO Officer. However, for contractual timelines under the CLA, the 90-day investigative timeline begins when the EEO Office receives a complete and credible report of the allegations (when the Intake process has been completed).

If an investigation is expected to take longer than 90 days to complete from the time the EEO Office received the credible complaint, the EEO Office shall send an extension notice directly to the employee(s) under investigation and the Complainant. In cases where the Respondent is covered under the CLA, or

other union agreement, the notice must also be sent to the TELR Manager who will forward to the appropriate union.<sup>26</sup>

A separate notice along with the formal complaint must be sent to the following individuals: Metro's General Manager, Metro's Deputy General Manager, the Division Director and Deputy Director, and the Coordination Team. Other individuals who have a legitimate need to know about the investigation may be added as necessary and appropriate, including TELR Representatives and HRBPs. The EEO Officer and Investigations Manager should be cc'd in this communication.

### c. Requests for Information and Documents

This section outlines how and when the EEO Office requests information and evidence from the parties to an investigation. In general, information and document collection should not commence until after a formal complaint has been drafted and sent to the parties. To complete a thorough and fair investigation, all parties must be given the opportunity to provide information they believe relevant to the allegations.

- i. **From Metro and DHR.** Requests for information or documents that could be considered a public record should be requested through Metro HR and/or DHR. Use the Request for Information template and send together with the formal complaint directly to the Metro HR Manager. Information requests may be sent at the same time with the formal complaint. Information requests to HR should be cooperative in nature, and HR may provide an explanatory narrative if helpful to the investigation.

If certain personnel documents are required for the investigation, use DHR's [Personnel File Access/Review Request Form](#). A list of documents kept in a personnel file can be found [here](#). When making the request, in the section "the purpose of my review is", select "Other" and copy and paste the following: "Metro EEO Investigation, Case Number XXXX. A copy of the full complaint and request for information has been provided to Metro HR." Once access is granted, documents may be downloaded to the case file.

In the case of denials from the Personnel File Access/Review Request Form, contact the Laserfiche Administrator or [laserfiche@kingcounty.gov](mailto:laserfiche@kingcounty.gov) for an explanation or review. Escalate to the EEO Officer, if necessary.

Documents requested via the Personnel File Access/Review Request Form should also be listed in the Request for Information but indicate that the request has also been made through the DHR online form. In some cases, documents normally stored in Laserfiche may not be immediately available. In such cases, make this consideration known in the Request for Information form sent to Metro HR.

- ii. **From Individual Respondents.** An individual Respondent may provide their responses to the allegations in an interview format or by providing a written statement. Individuals must be provided the opportunity to submit documentation and evidence in support of their response or that they believe would be helpful in the investigation.

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<sup>26</sup> See Chapter 2 Part II on working with TELR.

The EEO Office may request documents and information that is readily available to individual Respondents; although it is preferable that the EEO Office make requests directly to HR.<sup>27</sup> In some cases, an individual may have documents and evidence that are outside the control of the County or Metro, and it is appropriate to request those documents from them.

- iii. **From Complainants.** Information requests to Complainants do not need to be made through the same formal means as with the County or Respondents. However, if a piece of information or evidence is necessary to establish a prima facie case or to make a determination of discrimination, and is in the control of the Complainant, that request should be made in writing to the Complainant subject to the same standards for timeliness below.
- iv. **From Disability Services.** In cases where medically sensitive or disability-related information is necessary, an Investigator must receive written confirmation from the individual (usually the Complainant) to allow for the release of the information. After receiving written confirmation, the Investigator must forward it and a copy of the complaint to the appropriate contact at Disability Services.
- v. **Timeliness for Responses.** There is no defined amount of time, however, twenty (20) calendar days is the EEO Office's standard expectation. Extensions of time may be requested and granted at the investigator's discretion and in good faith with the party providing the response. However, see section on Adverse Inferences if responses and information is not received or unduly delayed.
- vi. **Adverse Inferences.** If any party fails to respond to a Request for Information, withholds information, alters documents, or significantly impedes an investigation by failing to provide requested information in a timely manner in an accessible format, the EEO Officer may conclude that the requested information was not produced because it was unfavorable to that party.

For example, an adverse inference could be applied during the burden shifting analysis, and the EEO Office may determine that the investigative record fails to show a legitimate nondiscriminatory reason for a Respondent's actions. Therefore, an adverse inference application may lead to a conclusion that a Complainant should prevail on their claim when a Respondent's stated reason for an adverse employment action is a pretext for discrimination.<sup>28</sup>

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<sup>27</sup> See Chapter 4 Part (b)(c)(i) regarding requesting documentation and information from Metro and DHR.

<sup>28</sup> See Chapter 1. Section III. d. Burden Shifting.

Adverse inferences should be used sparingly to make factual determinations. The EEO Office shall work in good faith with parties to gather data and information necessary to make a finding. The EEO Office shall provide all parties notice and the opportunity to provide information and documents requested before making such an inference.

#### d. Witness Interviews and Credibility

To complete a thorough and fair investigation, interviews with witnesses will often play a critical role. At minimum, the EEO Office should interview the Complainant, Respondent(s), and any parties who could reasonably be expected to have relevant information. Notes from interviews should be kept in the case file. For tips on how to conduct a successful interview, see [this EEOC guidance document](#). The same document gives the follow guidance on weighing the credibility of witnesses:

“If there are conflicting versions of relevant events, the employer will have to weigh each party’s credibility. Credibility assessments can be critical in determining whether the alleged harassment in fact occurred. Factors to consider include:

- **Inherent plausibility:** Is the testimony believable on its face? Does it make sense?
- **Demeanor:** Did the person seem to be telling the truth or lying?
- **Motive to falsify:** Did the person have a reason to lie?
- **Corroboration:** Is there **witness testimony** (such as testimony by eye-witnesses, people who saw the person soon after the alleged incidents, or people who discussed the incidents with him or her at around the time that they occurred) or **physical evidence** (such as written documentation) that corroborates the party’s testimony?
- **Past record:** Did the alleged harasser have a history of similar behavior in the past?

None of the above factors are determinative as to credibility. For example, the fact that there are no eye-witnesses to the alleged harassment by no means necessarily defeats the Complainant’s credibility, since harassment often occurs behind closed doors. Furthermore, the fact that the alleged harasser engaged in similar behavior in the past does not necessarily mean that he or she did so again.”

#### e. Investigative Finding

Upon completion of the investigation, the Investigator will draft a finding. The finding summarizes the important factual findings of the investigation, applies the facts to the relevant law or definitions, and makes a conclusion as to whether EEO law or the Policy was violated.<sup>29</sup>

This finding will be reviewed by the EEO Officer. The EEO Officer may ask for revisions or that some elements of the investigation be explored further.

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<sup>29</sup> See Burdens of Proof in Chapter 1 above.

The completion of an investigation is marked by when the EEO Officer approves of the finding Report. This also applies in cases where the investigation is conducted by an outside investigator.

#### **f. Closure, Notices, and Coordination Team**

Upon acceptance of the finding, the EEO Program Manager will send the finding and a notice of investigative closure to the General Manager, Assistant General Manager, Chief Administration Officer, the Division Director(s), and the Coordination Team. In some cases, regardless of the investigation's outcome, the Investigator may present their findings at the next Coordination Team meeting to provide context, highlight areas of concern, and answer questions.

The Coordination Team members will have one week after receiving the finding to raise concerns that would justify a delay of notifying the parties of closure of the case. This period will not alter the EEO Office's findings, as those have already been finalized by the EEO Officer. This period is to ensure the roll out of any action based on the findings do not disrupt the operations of the division.

Unless otherwise instructed by the EEO Officer, after one week from issuing the finding or providing a briefing, the Investigator will send notices to the parties.

The finding should be sent directly to the parties, except in cases involving sensitive medical information where only the Complainant should receive a copy of the unredacted report. In any case, Investigators should offer to meet with the Complainant and individual Respondent(s) regarding the outcome of the investigation and to explain the findings.

#### **g. Appeals, Reconsideration, and Dissatisfaction**

The EEO Office does not have a separate appeal or reconsideration process after findings are finalized. If a party is not satisfied with the outcome, they may contact the Department of Human Resources Director per the Policy. Parties may also escalate concerns to DHR at any time during the investigation.

### **V. Early Resolution**

Early resolution is an option to close a case after notices have been served, but before the investigation gets underway because certain actions could be taken that resolve the matter to the Complainant's and EEO Office's satisfaction. Early resolution is not an admission of violating EEO law or the policy.

In certain cases, such as those involving reasonable accommodations for disability and religion, the EEO Office can permit early resolution for the specific purpose of resolving the accommodation request. However, the EEO Office reserves the right to continue investigations regardless of any remedial or corrective actions taken.<sup>30</sup> A closure memo must be completed documenting the rationale for the resolution for approval by the EEO Officer and submission to the Coordination Team.

### **VI. Amending Complaints**

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<sup>30</sup> See Chapter 3, Part II. c, When the EEO Office Serves as the Complainant.

During an investigation, new information may become available that may require an amendment to the formal complaint. Generally, the EEO Office may amend formal complaints for two reasons:

1. Adding an unidentified Respondent to allegations found in the formal complaint.
2. Adding an allegation to the formal complaint.

In all cases, amendments are subject to the same considerations at the intake (see above). Removing Respondents and allegations is not a reason for amendment, unless there has been an obvious and gross error in drafting the complaint, in which case, it may be prudent to close the case entirely. Similarly, minor defects and errors do not warrant an amendment, as the factual record of the investigation will address those matters.

If amending is not proper, a new and separate investigation may commence in accordance with these procedures. In cases where an individual Respondent is already named, a separate investigation with a separate case number should be opened to maintain the privacy of the individuals. The investigations may be conducted simultaneously (e.g., the same interview notes and evidence may be used for both cases).

#### **a. Procedure for Amending**

To amend a formal complaint, the process is nearly identical to the procedures above starting at the formal complaint, but with slightly different templates. Additions to a formal complaint should be written with an underlined font and sent to the EEO Officer for approval. Upon approval, the Parties, GM, Deputy GM, Division Director(s), AGM for Employee Services, and Coordination Team should be sent the Amended formal complaint and a notice of amendment.

After notices are sent, the investigation may continue; however, special attention should be given to investigative timelines in coordination with TELR.

### **VII. Other Closure Procedures**

In addition to early resolution, a matter may be closed for additional reasons found below. In these cases, the investigator should prepare a **notice of closure** for approval by the EEO Officer. If approved, the matter is closed and the notice should be sent to the Parties, Metro GM and Deputy GM, AGM for Employee Services, the Division Directors, and the Coordination Team.

#### **a. Withdrawal**

If at any point during the intake or the formal investigation a Complainant determines they no longer wish to continue with their complaint, the EEO Office may close the file and dismiss the complaint as withdrawn. The investigator should document and confirm that the Complainant is not withdrawing under duress or threat. The EEO Office reserves the right to serve as complainant based on the same facts alleged in the withdrawn complaint.<sup>31</sup>

A Complainant may not reopen their complaint based on the same facts of a withdrawn complaint unless new information becomes available.

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<sup>31</sup> See Section above, “When the EEO Office Serves as a Complainant”.

**b. Unavailability or Impossibility**

If circumstances arise where the Complainant becomes unavailable or it becomes impossible to complete an investigation, the matter may be closed. Multiple good faith attempts must be made and documented by the investigator before preparing to close a matter for unavailability.

**c. Other Administrative Complaints and Lawsuits**

In situations where civil action has been filed by the Complainant and is being actively litigated in a court based on the same facts as were alleged to the EEO Office, the EEO Officer may decide to close the EEO Office investigation. The investigation may also be held in abeyance pending the resolution of the action or lawsuit. The EEO Office should work with TELR to ensure that contractual obligations for timeliness are honored.

Similarly, if a Complainant has filed a complaint with the EEOC or another federal or state agency based on the same facts that were alleged to the EEO Office, the EEO Officer may decide if the EEO Office investigation should be closed. The investigation may also be held in abeyance pending the resolution of the administrative investigation.

In its decision to close, continue, or put an investigation in abeyance, the EEO Office may consider the severity of the nature of the allegations, need for Metro to build a factual record of events, administrative efficiency, due process rights of the Parties, sufficiency of outside findings/work product, and the EEO Office's obligations under Metro and County policy.

## Chapter 4

# Types of Discrimination

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# Types of Discrimination

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Between EEO laws and the Policy, there are numerous types or theories of discrimination. This Chapter provides a legal framework by which claims, under both EEO law and Policy, are identified and can be analyzed.

This section is not meant to be legal advice, nor does it encompass all the considerations that can be made during an investigation. This section is a guide to understanding the types of discrimination the EEO Office will investigate and how it will generally analyze the allegations. Updates to case law will be made as appropriate. Investigators should consult EEOC Guidance when possible and appropriate: <https://www.eeoc.gov/guidance>

When drafting a formal complaint, each allegation for investigation should be based on one of the following kinds of discrimination. When applying the Policy, the analysis below should still be used as the Policy does recognize certain “discrete adverse employment actions” that generally mirror recognized types of discrimination under EEO law.

## Inappropriate Conduct (Policy)

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1. Respondent engages in conduct that communicates a hostile, derogatory, unwelcome or negative message about persons based on a protected class or engaging in a protected activity and
2. A reasonable person would find the conduct offensive.

---

**Generally:** Inappropriate conduct is a violation of the Policy and is not found in EEO law or case law. For cases involving inappropriate conduct, the conduct does not rise to the level of unlawful discrimination, harassment, sexual harassment, or retaliation. The elements listed above are the EEO Office's interpretation of the Policy based on legal research, conference with DHR, and best interpretive practices.

**Element 1, Retaliation: Supervisor or Manager versus Co-Worker:** The Policy makes an important distinction between retaliation by supervisors or managers and co-workers. For supervisors and managers, they must take a discrete adverse employment action. For co-workers, retaliatory behavior must be sufficiently severe or pervasive. In cases involving co-workers, the EEO Office will apply an analysis similar to element three of Harassment – Hostile Work Environment.

**Element 2, Objective and Subjective Offensiveness:** Note that this policy violation does not require a Complainant, nor does it require that a Complainant subjectively find specific conduct offensive. The reasonable person standard here is applied in an objective manner. For example, if a complainant who has other claims, does not believe that a respondent engaged in inappropriate conduct when they used a racial slur because they were not personally offended, the EEO Office may still proceed with a finding that respondent *did* engage in inappropriate conduct because the use of the slur is objectively offensive.

**Element 3, "Not unlawful":** The Policy describes Inappropriate Conduct almost as a catch-all for behavior that may not otherwise qualify as a violation of the Policy's other definitions. However, the Policy only makes a distinction for illegal conduct in the definition of "harassment", providing Title VII language of severe and pervasive (hostile work environment), and continued condition of employment (quid pro quo). See Chapter 1 above.

**Individuals are the Respondent:** The proper Respondent for Inappropriate Conduct should be an individual in most cases.

**Retaliation, "But-For" Causation:** In retaliation cases, the EEO Office must use a "but-for" causation standard. However, the "but-for" standard does not apply in inappropriate conduct cases or in the inappropriate conduct analysis.

## Discrimination (Policy)

---

1. Employer takes a discrete adverse employment action against an employee; and
  2. Employee's protected status was a substantial factor in the employer's decision.
- 

**Adverse Employment Action:** The Policy defines Adverse Employment Actions as those that “sustainably affect [] the terms, conditions, or privileges of employment.” It can include: discipline, discharge/layoff, and a failure to hire or promote. Because these discrete adverse employment actions are types of discrimination found in case law, the analysis in this Chapter for those kinds of discrimination should be used. A formal investigation and complaint should not be investigated as simply “discrimination”.

**Disability Discrimination:** The Policy makes a distinction with Disability Discrimination. See Failure to Accommodate Disability, below.

## Failure to Hire or Promote

---

1. Complainant is member of a protected class;
2. Complainant was qualified and applied for an available position/promotion;
3. Complainant was not offered the position;
4. Respondent hired someone outside of Complainant's protected class; and
5. Complainant's protected class was a substantial factor in the decision to not hire/promote.

---

**Element 2, "Applied for":** In cases where an employer does not advertise a position or utilize formal mechanisms for promotion opportunities (or even accept applications), Washington Courts have adopted a "relaxed federal standard" that does not require an aggrieved party to have actually applied for the position or promotion; however, the Complainant must still meet the "qualified" element. *Fulton v. State, Dept. of Social & Health Services*, 169 Wash.App. 137, 156-157 (2012).

**Element 4, Age Considerations:** By the federal standard, in age discrimination cases, Complainant must be 40 years or older to be in the protected class; however, that does not necessarily mean that a prima facie case is made if the individual who was awarded the job/promotion was 39, for example. See *Kirby v. City of Tacoma*, 124 Wash.App. 454, 466 (2004) (holding that Plaintiff did not state a prima facie case when the persons receiving promotions were only 7-10 years younger and were in the same protected age of 40-70 years old). See also *Kuyper v. Dep't of Wildlife*, 79 Wash.App. 732, 735 (1995) and *Brady v. Daily World*, 105 Wash.2d 770, 777(1986). KCC 12.18.020 only defines age to be 18 years old or older.

## Different Terms and Conditions

---

1. Complainant is member of a protected class;
  2. Complainant was treated less favorably in the terms or conditions of their employment than similarly-situated comparators who are not members of the Complainant's protected class; and
  3. Complainant and the nonprotected "comparator" were doing substantially the same work.
- 

**Generally, Not Recognized by Policy:** The Policy does not recognize different terms and conditions as its own legal theory (making it part of the definition of a discrete adverse employment action), but it does not preclude it from being a type of discrimination. However, contrary to EEO guidance as explained below, the Policy requires that discrimination must "substantially affect the terms, conditions, or privileges of employment." The EEO Office may interpret discriminatory different terms and conditions as inappropriate conduct if the treatment does not substantively affect the terms of employment.

**Element 2, "Less Favorably":** EEOC Guidance makes clear that in addition to the more obvious terms and conditions of employment (such as hiring, discipline, promotions, and pay), DTC discrimination "also means an employer may not discriminate, for example, when granting breaks, approving leave, assigning workstations, or setting any other term or condition of employment – *however small.*" [Prohibited Employment Policies/Practices | U.S. Equal Employment Opportunity Commission \(eoc.gov\)](#)

## Harassment – Hostile Work Environment

---

1. Harassing conduct was unwelcome and offensive;
  2. Harassing conduct occurred because of protected class;
  3. Harassing conduct affected the terms or conditions of employment; and
  4. Harassing conduct can be imputed to the employer.
- 

**Generally, Includes Sexual Harassment:** Hostile work environment cases based on sex also include sexual harassment. *Glasgow v. Georgia-Pacific Corp.*, 103 Wash.2d 401 (1985). While the term “sexual harassment” does not appear in Title VII, it is a cognizable claim. *Burlington Industries, Inc. v. Ellerth*, 524 U.S. 742, 743 (1998); *Meritor Sav. Bank, FSB v. Vinson*, 477 U.S. 57 (1986). However, harassment based on sex does not need to be of a sexual nature to be actionable. *Payne v. Children’s Home Society of Washington, Inc.*, 77 Wash.App. 507 (1995). The Policy provides separate definitions for Harassment and Sexual Harassment, but the analysis is generally consistent with this Handbook.

**Element 1, “Offensive”:** The offensiveness of the alleged harassing conduct is subjective to what the Complaining Party regarded as undesirable or offensive; however, the standard is not purely subjective as explained in Element 3. *Glasgow v. Georgia-Pacific Corp.*, 103 Wash.2d 401, 406 (1985).

**Element 3, affecting the terms or conditions of employment:** “Casual, isolated or trivial manifestations of a discriminatory environment do not affect the terms or conditions of employment to a sufficiently significant degree . . . The harassment must be sufficiently pervasive so as to alter the conditions of employment and create an abusive working environment. Whether the harassment at the workplace is sufficiently severe and persistent to seriously affect the emotional or psychological well-being of an employee is a question to be determined with regard to the totality of the circumstances.” *Glasgow v. Georgia-Pacific Corp.*, 103 Wash.2d 401, 406-407 (1985).

**Element 4, Imputation:** If an owner, manager, partner or corporate officer participates in the alleged harassment, this element is met. Otherwise, a Complainant must establish that the Respondent employer (1) authorized, knew, or should have known of the harassment, and (2) it failed to take reasonably prompt and adequate corrective action.” *Glasgow v. Georgia-Pacific Corp.*, 103 Wash.2d 401, 407 (1985).

**Element 4, Imputation:** Under Metro policy an employee can be individually found to have violated the harassment policy even if the harassing conduct cannot be imputed to Metro. Thus, if there was a named Respondent identified, the conduct could have been imputed them to them individually.

**Element 4, Not Required Under Policy:** Under the Policy, imputation is not a required element the Policy.

## Harassment – Quid Pro Quo

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1. Employer requires sexual consideration from the employee for job benefits; and
2. The harassing conduct, requests, threats, or promises are made by someone with authority or has the apparent authority to enact the employment decision.

---

**Generally:** Quid Pro Quo is one of two types of sex discrimination claims, where the employer requires sexual consideration from the employee for job benefits (included continued employment). The other kind of sex discrimination is the hostile work environment claim. *Antonius v. King County*, 153 Wash.2d 256, 261 (2004). While the term “quid pro quo” does not appear in Title VII, it is a cognizable claim. *Burlington Industries, Inc. v. Ellerth*, 524 U.S. 742, 743 (1998); *Meritor Sav. Bank, FSB v. Vinson*, 477 U.S. 57 (1986).

**Element 1:** Regardless of whether the harassing employee had the actual authority to make the employment decisions, the apparent or perceived authority a supervisor to make an employment decision is sufficient to impose strict liability on the employer for their actions. *Thomas v. Berta Enterprises, Inc.*, 72 Wash.App. 531, 539 (1994).

## Discharge

---

1. Complainant is a member of a protected class;
2. Complainant is discharged;
3. Complainant was doing satisfactory work when the decision to terminate was made;
4. Respondent continued to seek applicants with complainant's qualifications; and
5. Complainant's protected class was a substantial factor in the decision to terminate.

---

**Element 3, Satisfactory Work:** An employee's assertion of good performance to contradict the employer's assertion of poor performance does not give rise to a reasonable inference of discrimination. *Chen v. State*, 86 Wash.App. 183, 191 (1997); *Parsons v. St. Joseph's Hosp.*, 70 Wash.App. 804, 811, 856 (1993). "A plaintiff who violates company policy and fails to improve his performance despite a warning has not demonstrated satisfactory performance. *Diaz v. Eagle Produce Ltd. Partnership*, 521 F.3d 1201, 1208 (9th Cir. 2008), citing *Mungro v. Giant Food, Inc.*, 187 F. Supp.2d 518, 522 (D.Md.2002).

## Constructive Discharge

---

1. Complainant is a member of a protected class;
  2. Respondent deliberately makes Complainant's working conditions intolerable on account of Complainant's protected class;
  3. A reasonable person would be forced to resign because of the intolerable conditions; and
  4. Complainant resigned solely because of the conditions and not for some other reason.
-

## Failure to Accommodate Disability

---

1. Complainant had a disability that substantially limited their ability to perform the job;
2. Complainant gave the employer notice of the disability and its substantial limitations;
3. A accommodation exists that would allow Complainant to perform the essential functions of the job, enjoy equal benefits and privileges of employment, or participate in the application process); and
4. After notice, Respondent failed to adopt (reasonable) measures that were medically necessary to accommodate the disability.

---

**Generally, Interpretation of Policy:** The Policy does not recognize failure to accommodate disability but couches it as a specific type of discrimination called “disability discrimination”. The elements that can be parsed from the Policy are essentially the same as the elements above: (1) employer knows that employee is unable to perform an essential function of the job due to disability; (2) and employer fails to provide a reasonable accommodation that would enable the employee to perform the essential function. Because of this similarity, the EEO Office will use the analysis here to apply this provision of the Policy.

**Pregnant Workers Fairness Act:** In 2023, the federal government passed the Pregnant Workers Fairness Act (PWFA), which requires a covered employer to provide a reasonable accommodation to a qualified employee’s or applicant’s known limitations related to, affected by, or arising out of pregnancy, childbirth, or related medical conditions, unless the accommodation will cause the employer undue hardship. Examples of reasonable accommodations under the PWFA are: (1) additional, longer, or more flexible breaks to drink water, eat, rest, or use the restroom; (2) changing equipment, devices, or workstations, such as providing a stool to sit on, or a way to do work while standing; (3) changing a work schedule, such as having shorter hours, part-time work, or a later start time; (4) telework, and more. The PWFA effectively makes it easier for pregnant persons to receive certain reasonable accommodations through a less invasive interactive process. See [What You Should Know About the Pregnant Workers Fairness Act | U.S. Equal Employment Opportunity Commission \(eoc.gov\)](#)

**Element 1, Pregnancy:** Pregnancy, by itself, is not a disability for the purposes of this charge, and a disability accommodation does not have to apply, and pregnancy discrimination can be analyzed solely under a sex discrimination framework. *Hegwine v. Longview Fibre Co., Inc.*, 132 Wash.App. 546 (2006). However, [EEOC guidance](#) interpreting the Pregnancy Discrimination Act notes that if a person is pregnant and unable to perform their duties because of a medical condition related to the pregnancy or childbirth, the employer must treat them as a temporarily disabled employee. At least one Circuit Court has recognized lactation as a qualifying medical condition. *EEOC v. Houston Funding, Ltd.*, 717 F.3d 425 (5th Cir. 2013).

**Element 4, Reasonable, Undue Hardship:** Citing the WAC, the Washington State Supreme Court noted that “[t]he cost of accommodating an able handicapped worker will be considered to be an undue hardship on the conduct of the employer’s business only if it is unreasonably high in view of the size of the employer’s business, the value of the employee’s work, whether the cost can be included in planned remodeling or maintenance, the requirements of other laws and contracts, and other appropriate considerations.” *Dean v. Municipality of Metropolitan Seattle-Metro*, 104 Wash.2d 627, 633 (1985).

**Element 4, Unreasonably Delay:** EEOC provides a five factor test to determine whether there has been an unnecessary delay that weighs: (1) the reason(s) for the delay, (2) the length of the delay, (3) how much the individual with a disability and the employer each contributed to the delay, (4) what the employer was doing during the delay, and (5) whether the required accommodation was simple or complex to provide. See [here](#).

## Failure to Accommodate Religion

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1. Complainant held a bona fide religious belief, the practice of which conflicted with employment duties;
  2. Complainant informed the employer of the beliefs and conflict; and
  3. After notice, Respondent failed to adopt (reasonable) measures that accommodated the request.
- 

**Generally:** The Washington State Supreme Court more recently recognized and created a cause of action for failure to accommodate religion in *Kumar v. Gates Gourmet Inc.*, 180 Wash.2d 481 (2014) overruling *Short v. Battle Ground School Dist.*, 169 Wash.App. 188 (2012). The *Kumar* court adopted the above elements from *Lawson v. Washington*, 296 F.3d 799, 804 (9th Cir. 2002).

**Informed the Employer:** Similar to a disability accommodation, King County has a process for requesting a religious accommodation. See here: [Religious Accommodation Policy](#), DHR Policy, 2021-0013

# Retaliation

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1. Complainant engaged in a statutorily protected activity;
  2. Employer took adverse action against Complainant; and
  3. There is a causal link between the protected activity and adverse action.
- 

**Element 1, Protected Activity:** To state a prima facie case, a Complainant need only complain or report of conduct that was at least arguably a violation of law, not that the conduct would have actually violated discrimination laws or ordinances. *Estevez v. Faculty Club of University of Washington*, 129 Wash.App. 774, 798 (2005).

**Element 2, Adverse Action:** Adverse treatment or actions are “reasonably likely to deter employees from engaging in protected activity . . . [but do] not cover every offensive utterance by co-workers, because offensive statements by co-workers do not reasonably deter employees from engaging in protected activity.” *Ray v. Henderson*, 217 F.3d 1234, 1243 (9th Cir. 2005). See also, [Enforcement Guidance on Retaliation and Related Issues | U.S. Equal Employment Opportunity Commission \(eoc.gov\)](#)

**Element 3, Causal Link:** Courts have looked a number of factors to establish causation, including: proximity of time between the action and protected activity, work performance, and employer’s knowledge of the activities. *Estevez v. Faculty Club of University of Washington*, 129 Wash.App. 774, 800 (2005); *Vasquez v. State, Dep’t of Soc. & Health Serv.*, 94 Wash.App. 976, 985 (1999).

**Element 3, Knowledge:** The EEOC states that, “[r]etaliation cannot be shown without establishing that the [Respondent] knew of the prior protected activity. Absent knowledge, there can be no retaliatory intent, and therefore no causal connection.” See [https://www.eeoc.gov/laws/guidance/enforcement-guidance-retaliation-and-related-issues#\\_ftn4](https://www.eeoc.gov/laws/guidance/enforcement-guidance-retaliation-and-related-issues#_ftn4)

When Metro is the Respondent, the individual who carries out the adverse employment action does not need to have personal knowledge, as long as there is knowledge by someone in the supervisory-decision making chain that had knowledge. See *Henry v. Wyeth Pharmaceuticals, Inc.*, 616 F.3d 124 (2d Cir. 2010).

**Element 3, “But for”:** The standard for state or local government employers is the “but-for” causation, that is, “the employer would not have taken the adverse employment action but for a design to retaliate.” *University of Texas Southwestern Medical Center v. Nassar*, 570 U.S. 338 (2013). See <https://www.eeoc.gov/laws/guidance/questions-and-answers-enforcement-guidance-retaliation-and-related-issues>

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King County Metro Transit Department  
Equal Employment Opportunity Office  
201 S Jackson St.  
Seattle, WA 98104-3856  
(205) 477-9454 (TTY Relay 711)  
[MetroEEO@kingcounty.gov](mailto:MetroEEO@kingcounty.gov)



Attachment 7:  
Subrecipient Seattle  
Department of Transportation  
EEO Program



**Seattle**  
Human Resources  
Workforce Equity Division

# City of Seattle Equal Employment Opportunity Program



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## Statement of Policy

### Equal Employment Opportunity/ Affirmative Action

The City of Seattle is an Equal Opportunity and Affirmative Action employer committed to creating an inclusive environment free of discrimination and harassment for all employees, job applicants, volunteers, and contractors. The City of Seattle will not tolerate any form of discrimination or harassment based on age, ancestry, color, creed, disability, gender identity, marital status, national origin, parental status, political ideology, race, religion, sex, sexual orientation, use of service animal, military status or veteran and use of section 8 certificate. Our goal is to be an inclusive workforce that is representative, at all job levels, of the citizens we serve.

#### Legal Authorities

- Seattle Fair Employment Practices
- Washington Law Against Discrimination
- Civil Rights Act Title VI and VII
- Age Discrimination in Employment Act
- Genetic Information Non-discrimination Act
- Equal Pay Act of 1963
- Americans with Disabilities (ADA)

**Affirmative Action/Equal Employment Opportunity.** The City of Seattle's Equal Employment Opportunity (EEO) Policy and Affirmative Action Plan are established in accordance with the laws and regulations set forth in Titles VI and VII of the Civil Rights Act of 1964, the Equal Employment Act of 1972, Presidential Executive Order 11246, as amended, the Office of Contract Compliance Programs Chapter 60 of Title 41CFR and Part 60-2 as amended and the U.S. Department of Justice, Office for Civil Rights, 28 CFR 42.301 governing requirements for grant recipients to establish and maintain an EEO Plan, which includes race/gender workforce analysis, and hiring and implementation plan components.

The City of Seattle commits to an equal employment opportunity policy that prohibits discrimination on the basis of age, ancestry, color, creed, disability, gender identity, marital status, national origin, parental status, political ideology, race, religion, sex, sexual orientation, use of service animal, military status or veteran and use of section 8 certificate.

The City's Affirmative Action Program directs management at all levels to develop and implement strategies designed not only to achieve a workforce that is a reasonable

representation of the relevant labor market consistent with and dependent upon the business conditions and number of placement opportunities that may occur, but also to ensure equal employment opportunity for all.

For a copy of the City's Affirmative Action Plan and Equal Employment Opportunity Policy, please contact [EEO@seattle.gov](mailto:EEO@seattle.gov)

# City of Seattle EEO Program Structure

## City of Seattle Structure and Designation of EEO Program

The City of Seattle functions in a federated Human Resources structure in which departments maintain a degree of autonomy and responsibility to manage employment and functional business areas. While in the federated system, city departments continue to collaborate and share administrative resources.

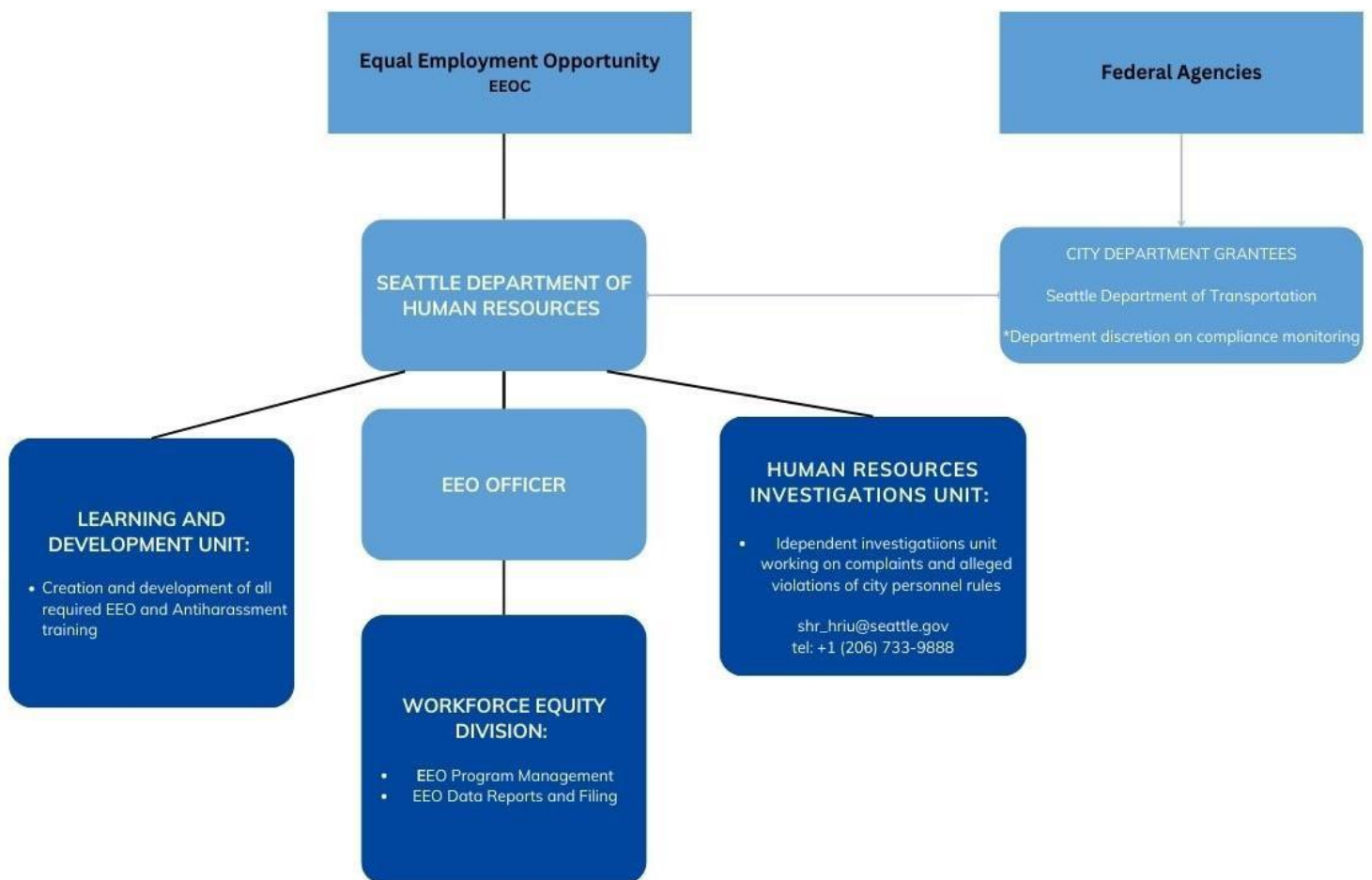
The City of Seattle's Department of Human Resources is its own department that functions as an administrative and policy driven department for other city departments. The citywide EEO Program covers the creation and dissemination of EEO policy, filing of the EEO-4 reports, and advising on program management of equal employment activities.

Seattle Human Resources (SHR), also known as the Seattle Department of Human Resources (SDHR), manages some Citywide programs including but not limited to; labor relations, recruitment compliance, learning and development projects, and various employee benefits. SDHR offers select services and consultation within our subject-matter expertise to City departments and the HR community, in partnership with our labor unions and executive departments, for the benefit of our Citywide workforce.

# Designation of Personnel Responsible for EEO Program

Given that the city operates under a federated model, the structure of the citywide Equal Employment Opportunity (EEO) program is distinct and tailored to accommodate this governance framework. In a federated model, various departments and agencies maintain a degree of autonomy while adhering to federal, state, and local policies and standards. Consequently, the EEO program is designed to reflect this decentralized approach, ensuring that each department can effectively implement and manage department specific EEO initiatives within its unique operational needs. See Organization Chart below.

# City of Seattle Equal Employment Opportunity Program Department Structure



## Equal Employment Opportunity Officer

The citywide EEO Officer is Christopher Artis, Workforce Equity Director who reports directly to the Director of SDHR. The EEO Officer's contact information is listed on the EEO policy statement and in web communications. The EEO Officer in partnership with the EEO Program Manager manages citywide EEO program policy and data management. SDHR compiles and submits the EEO-4 report and continues to action new workforce equity initiatives to address the underutilization of communities within the workforce.

The EEO Officer's Program responsibilities include:

- Maintaining up-to-date EEO Policy statement and written EEO Program.
- Collaborating with executives and leadership teams in targeting problem areas, settings goals, and developing programs to achieve goals.
- Designing, implementing, and monitoring reporting systems to measure program effectiveness, program advancements, and continual program review.
- Review employment practices/policies (ie. SDHR recommended hiring practices, EEO employee training, promotions audits, investigations practices)
- Complies with federal requirements for citywide EEO data (EEO-4 report to be filed biennially to the EEOC)
- Maintaining awareness of current EEO laws and regulations, and ensuring the laws and regulations affecting nondiscrimination are disseminated to responsible officials
- Auditing postings of the EEO policy statement to ensure compliance information is posted and up to date.

## Human Resources Investigations Unit within SDHR

SDHR's Human Resources Investigation Unit is a resource for current or former employees to start an investigations process related to discrimination, harassment, or retaliation.

Employees who experience a violation of applicable equal employment laws and/or mandated reporters who become aware of such violations are instructed to file a report with HRIU. To contact HRIU please email their inbox: shr\_hriu@seattle.gov.

## Learning and Development Team within SDHR

The learning and development team within SDHR conducts research and development of all EEO required trainings for citywide implementation. To ensure all employees and managers are aware of and action anti-discriminatory practices, SDHR's Learning and Development team updated and published two vital training courses specific to citywide EEO policy in 2024.

### Citywide EEO Training Requirements:

All city employees must complete the Anti-harassment and Anti-discrimination eLearning which includes topics on:

- Recognizing Protected classes & Activities
- Distinguishing Prohibited Behaviors
- Understanding Mandatory Reporter Responsibilities
- Responding to Prohibited Behaviors

All people managers must complete the Equal opportunity essentials training which includes topics on:

- Anti-harassment and anti-discrimination overview
- Responsibility as a mandatory reporter
- Prohibited behaviors reporting options
- Harm reduction framework

## Department Specific Designation of Programs

Departments that receive grants are responsible for a range of additional Equal Employment Opportunity (EEO) activities specific to their department. These responsibilities include, but are not limited to, the following:

- **Grantee Program Requirements from Assigned Federal Agency:** Each department must ensure adherence to the specific program requirements set forth by the federal agency that awarded the grant. This includes compliance with all relevant EEO monitoring, reporting, and implementation guidelines to ensure nondiscrimination and equal opportunity in all aspects of the program.
- **Required Training Activities:** Departments must develop and administer any additionally required mandatory training sessions related to EEO.
- **Required Data Collection and Submission:** Departments are responsible for collecting and maintaining accurate data related to EEO activities. This includes gathering information specific to grantee requirements on workforce demographics, tracking EEO complaints and resolutions, and monitoring compliance with EEO policies. Departments must also submit this data to the relevant federal agency as part of their reporting requirements.
- **Overall Program Activities and Designation of Responsibilities:** Departments must oversee the implementation of EEO activities within their programs. This involves developing and executing EEO plans, ensuring that all program activities align with EEO principles, and designating specific staff members to manage and coordinate department specific EEO efforts. These designated individuals are responsible for ensuring compliance, addressing EEO concerns, and fostering an inclusive and equitable environment within the department.

# Plan for Dissemination Internally and Externally

The City of Seattle is an equal opportunity employer and ensures that policy is provided to all employees. The City of Seattle disseminates the EEO policy internally and externally through these measures:

## Internal Dissemination:

- EEO Policy Statement and Resources regarding human resources investigations, antiharassment training, and employment data are available to all employees on a shared in web service.
- EEO Policy training is available to all managers and required for new people managers.
- Equal Opportunity Essentials training is available to all employees.
- Anti-harassment and Anti-discrimination training is required for all employees to complete.
- EEO Policy Statements and materials are shared with departments to decide dissemination of physical material

## External Dissemination:

- To comply with EEOC standard, the City of Seattle has the EEO policy statement posted on the public website: [www.seattle.gov/human-resources/about-us/workforce-equitysources](http://www.seattle.gov/human-resources/about-us/workforce-equitysources) | [seattle.gov](http://seattle.gov). EEO Policy statements are listed on all job postings and recruitment entities for city employment.
- The City of Seattle states in all external disseminations of the EEO policy that it is an equal employment opportunity employer. This includes the dissemination internal on NEOGOV recruitment postings, LinkedIn postings, and on physical job listings.

# Actioning EEO Data Findings

The federated system allows departments to be responsible for their recruitment, hiring, and retention practices. SDHR's Workforce Equity team has created the UNITE (Unifying Next Level Inclusion through Equity) framework to support citywide adoptions of equitable HR practices. The UNITE framework provides departments with resources and data to action change in human resource policies and practices specifically barriers in hiring and career advancement for underutilized communities. The UNITE framework will address marginalized communities represented in the workforce and all departments will create SMART goals to achieve these outcomes.

## Plan for monitoring and reporting the EEO Program

The City of Seattle monitors and reports the EEO Program through numerous initiatives and data sequences. The UNITE framework and Workforce Equity unit within SDHR works to inform and guide departments on equitable hiring practices and encourage retention strategies for all employees.

Through the deployment of a new human resource information system, Workday, the city aims to mobilize all employees and managers with the data and reporting tools to understand our workforce better. In addition, the City of Seattle compiles and submits the EEO-4 Report to comply with EEOC requirements and further workforce data reporting throughout the city.

Attachment 8:  
Sound Transit Review of EEO  
Program Compliance



**OFFICE OF CIVIL RIGHTS, EQUITY & INCLUSION**

November 18, 2025

Christopher Takashi Bhang  
EEO Officer  
Civil Rights Office  
201 S. Jackson Street  
KSC-TR-0415  
Seattle, WA 98104

Dear Chris,

We thank you and your civil rights compliance team for participating in Sound Transit's Equal Employment Opportunity (EEO) Program Compliance Review and site visit on November 5, 2025. As a recipient of Federal Transit Administration (FTA) funding, it is mandated that Sound Transit ensures our business partners provide a workplace that is free from harassment and discrimination and have the required programs and policies in place to achieve that goal per FTA Circular 4704.1A.

Attached is a copy of the site visit report including the employee interview results, document review, and recommendations discussed during the exit conference. This ends our compliance review with King County Metro Transit. We are available to provide technical assistance in the future.

Again, we are happy to serve as a resource for you and answer any questions you may have about this process or our Office of Civil Rights, Equity and Inclusion. It was a pleasure meeting your team and spending the day at your offices. I can be reached at (206) 903-7538 or [Kevin.Gettis@soundtransit.org](mailto:Kevin.Gettis@soundtransit.org).

Sincerely,

Daphne D. Cross  
Chief Economic Development & Civil Rights Officer

Sincerely,

Kevin A. Gettis  
Sr. Program Manager - EEO

**Daphne D. Cross**  
*Chief Economic Development &  
Civil Rights Officer*

**Alison Smith**  
*Chief of Staff*

**Kevin A. Gettis**  
*Senior Program Manager - EEO*

**Han Song**  
*Sr. Data Systems Analyst*

cc: File



**Sound Transit Equal Employment Opportunity (EEO)  
External Compliance Site Visit Checklist**

**Recipient Name:** King County Metro Transit

**Contract Name:** Partner Agency

**Contract Number:** N/A

**Nature of Work:** Transportation Services

**Conducted by:** Daphne Cross, Chief Economic Development & Civil Rights Officer  
Kevin Gettis, Senior Program Manager - EEO

**Site Visit Date:** November 5, 2025

**Site Visit Location(s):**

KCM CentralAtlantic Base

1500 6<sup>th</sup> Avenue S, Seattle, WA 98134

KCM Communications Base

1236 6<sup>th</sup> Avenue S, Seattle, WA 98134

**Recipient Representative(s):**

**Christopher Bhang, Equal Employment Opportunity Officer**

**Dave Edwards, Investigations Manager, EEO**

**Dave Morrison, Accounting, Grants and Contracts Section Manager**

**Opening Session:**

Per the FTA EEO Circular 4704.1A, Section 2.2.7, Agency Monitoring and Reporting, as a Sound Transit subcontractor, the purpose of this Equal Employment Opportunity (EEO) Contract Compliance site visit is to examine and evaluate your agency’s policies and practices in determining compliance with non-discrimination provisions to fulfill the EEO commitments of your contract/business agreement with Sound Transit.

**Review of EEO Documents:**

Document	Copy Provided	EEO Clause Present	Comments/Upload
EEO policy signed by CEO and posted in conspicuous locations	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Visited two buildings (1500 6 <sup>th</sup> Ave S and 1263 6 <sup>th</sup> Ave S) 1500 had many bulletin boards where some could have had policy postings.
Know Your Rights Posters posted in conspicuous locations	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Know Your Rights not visible in conspicuous locations. Recommend posting. See EEOC website for copies.
EEO language included in recruitment ads and other personnel related documents	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Subcontractor Contract includes EEO provisions	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	SECTION 6 NONDISCRIMINATION AND PAYMENT OF A LIVING WAGE
EEO Notification to Unions	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Employee Handbook	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Appendix
Complaint Process and Procedures	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Investigations & Procedures Handbook
Employment Practices	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	2022 EEO Program, pg 13

<b>Current List of Subs, Consultants</b>	<input checked="" type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b>	<input checked="" type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b>	2022 EEO Program1.
<b>Other Documents Provided:</b>	<input checked="" type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b>	<input checked="" type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b>	EEO Program Report 2025 Update

**Exit Conference and Preliminary Findings:**

Any preliminary findings that, if not corrected immediately or not corrected by the adoption of an acceptable corrective action plan, would necessitate a determination of noncompliance.

Preliminary Findings
<ol style="list-style-type: none"> <li>1. EEO Policy should be located in conspicuous areas where employees congregate.</li> <li>2. Obtain and disseminate “Know Your Rights” posters to place in conspicuous areas where employees congregate.</li> <li>3. Consider annual EEO training for all employees and focused accountability training for managers.</li> </ol>

**Is corrective action needed?**

YES                       NO

**Describe the corrective action recommendation:**

**Contractor will be notified in writing within 15 days of site visit regarding any necessary next steps or that compliance requirements have been met via a final report.**

**Employee Interviews:** Interviews should include persons of color and female employees of varying tenures.

Employee Name	Title	Tenure	Race	Gender

Question	Answer	Comments
1) Do you know the name of your EEO Officer?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
2) Were you provided a copy of the company's EEO policy when you were hired?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	It was emailed. I work 100% remote.
3) Do you know where to access the company's EEO policy?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Website, SharePoint
4) Are you aware of your right to file a complaint of discrimination or harassment?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
5) Do you know where to locate the company's complaint procedures?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	SharePoint
6) Have you attended EEO training?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Serves on EEO/AA advisory committee as Secretary. Website required training less than a year ago.
7) Do you feel that King Co. Metro provides a work environment free of harassment and discrimination?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
8) Any other information you would like to share.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Frontline cust. Svc. Staff encounter customers that cuss, harass, use obscenities and leadership does not tolerate that. They post messages that those calls are not tolerated and allows staff to disconnect, if necessary. Healthy employees are good for the employees and the customers.

**Employee Interviews:** Interviews should include persons of color and female employees of varying tenures.

Employee Name	Title	Tenure	Race	Gender
██████████	██████████	██████████	██████████	██████████

Question	Answer	Comments
1) Do you know the name of your EEO Officer?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Not positive
2) Were you provided a copy of the company's EEO policy when you were hired?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Not sure.
3) Do you know where to access the company's EEO policy?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	SharePoint
4) Are you aware of your right to file a complaint of discrimination or harassment?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
5) Do you know where to locate the company's complaint procedures?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	EEO page and search King County
6) Have you attended EEO training?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Earlier this year
7) Do you feel that King Co. Metro provides a work environment free of harassment and discrimination?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There are few women, and minority skepticism. Environment of homophobic, transphobic, and others who do not entertain certain ideas. But loose enforcement and accountability since covid, so employees don't speak up or intervene
8) Any other information you would like to know.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Things described above aren't daily and it's well known that I don't entertain those ideas. People know that I am particularly supportive of trans and minority rights. Follow-up (Daphne): Based on observations you described, is anyone reporting? – "If you don't believe

		it, you don't enforce it (or accountability)." Especially impacts trans. I don't think management would pursue any real punishment but more a slap on the wrist.
--	--	--

**Employee Interviews:** Interviews should include persons of color and female employees of varying tenures.

Employee Name	Title	Tenure	Race	Gender
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Question	Answer	Comments
1) Do you know the name of your EEO Officer?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Chris Bhang
2) Were you provided a copy of the company's EEO policy when you were hired?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Was an internal transfer. Not sure of the formal version.
3) Do you know where to access the company's EEO policy?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Internal employee. A link was sent out to the page.
4) Are you aware of your right to file a complaint of discrimination or harassment?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
5) Do you know where to locate the company's complaint procedures?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Website or email to request the information
6) Have you attended EEO training?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Completed a refresher six weeks ago
7) Do you feel that King Co. Metro provides a work environment free of harassment and discrimination?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Two disability harassment complaints filed with no results. It's a mixed bag and all areas are not the same, but Finance and Business Admin is not good.
Any other information you would like to know.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Chris Bhang is amazing. He's trying hard and things are better for woman and women of color. His dept. needs more support, but he helped her feel comfortable filing a complaint and feels heard and less alone.



Attachment 9:  
2022 EEO Program Report  
(Previous FTA Submission)

King County Metro

# 2022 EEO Program Report

FTA TrAMS ID: 1731

March 1, 2022



King County

**METRO**

*Moving forward together*

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

[Metro.EEO@kingcounty.gov](mailto:Metro.EEO@kingcounty.gov)

(206) 477-9454 (TTY Relay 711)

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# Attachments

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**Attachment 1:** EEO Policy Statement and Q&A

**Attachment 2:** Metro EEO Policy, PER-22-8-DP

**Attachment 3:** Metro Organizational Chart

**Attachment 4:** Goals and Timetables from Previous Submission, 2018

**Attachment 5:** Subrecipient Seattle Department of Transportation EEO Plan

**Attachment 6:** Nondiscrimination, Anti-Harassment & Inappropriate Conduct Policy

**Attachment 7:** Workforce Analysis by Job Title, 2018-2021

**Attachment 8:** Workforce Availability and Utilization Analysis by EEO Category, 2018-2021

**Attachment 9:** Utilization Analysis, Goals and Timetables, 2022-2025

**Attachment 10:** Statistical Analysis, 2016-2021

# Remarks from Metro’s General Manager

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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](mailto: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

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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 Statement<sup>1</sup>

---

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](mailto:MetroEEO@kingcounty.gov)  
Phone: 206-477-9454

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<sup>1</sup> 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.<sup>2</sup> 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.

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

# Designation of Personal Responsibility

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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 Manager's Authority with all levels of management, labor unions and employees.<sup>3</sup> 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;

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<sup>3</sup> 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.<sup>4</sup>

## 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.<sup>5</sup>

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

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

# Workforce and Utilization Analysis

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This section provides an overview of the demographics of Metro’s workforce, specifically focusing on gender and minority status<sup>6</sup>, in accordance with FTA requirements.<sup>7</sup> 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. Paraprofessionals<sup>8</sup>
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.

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<sup>6</sup> 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.

<sup>7</sup> Attachment 7, Workforce Analysis by Job Title, 2018-2021.

<sup>8</sup> 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.<sup>9</sup> 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.<sup>10</sup>

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.

<sup>9</sup> Attachment 4, Previous EEO Program Report and Goals and Timetables, 2018.

<sup>10</sup> 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.<sup>11</sup> 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.

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<sup>11</sup> Attachment 9, Utilization Analysis, Goals and Timetables, 2022-2025.

# Employment Practices

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The following is a summary of Metro’s current employment practices.<sup>12</sup> 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.

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<sup>12</sup> 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 Benefits<sup>13</sup>

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.

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<sup>13</sup> 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

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## 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.”<sup>14</sup>

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.<sup>15</sup> 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.<sup>16</sup>

## 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.

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

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

<sup>16</sup> 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.

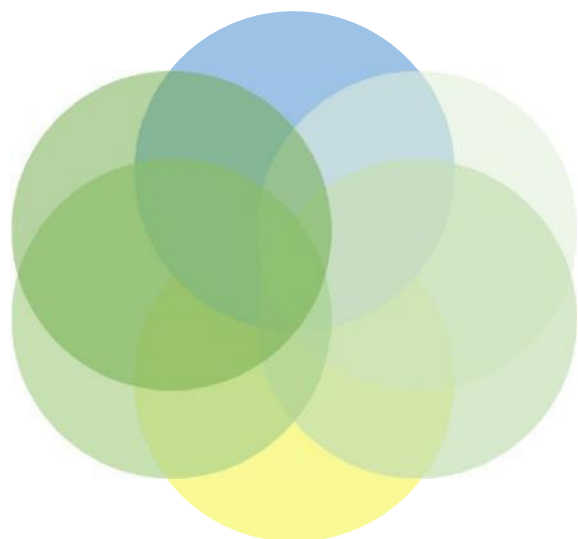
Regardless of the source or first point of contact where it was first reported, all matters are directed to the EEO Office for intake, data collection, and monitoring. The EEO maintains a log of all complainants, the basis of the complaint, protected class, date of contact, date of resolution, name of 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](mailto: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](mailto: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](mailto:MetroEEO@kingcounty.gov)

[www.kingcountny.gov/depts/transportation/metro](http://www.kingcountny.gov/depts/transportation/metro)

[www.kingcountymetro.blog](http://www.kingcountymetro.blog)

# Attachment 10: 2023 EEO Program Report Update



King County Metro

**EEO Program Report**  
**2023 Update**

March 8, 2023



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

[Metro.EEO@kingcounty.gov](mailto:Metro.EEO@kingcounty.gov)

(206) 477-9454 (TTY Relay 711)

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# Introduction from Metro's EEO Officer

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On behalf of the Equal Employment Opportunity (EEO) Office for King County Metro, I am pleased to present this 2023 update to our [2022 EEO Program Report](#), marking the first time Metro has published a report on its EEO programming outside of normal four year reporting cycles. The decision to make this an annual report was made as part of our commitment to employees in building transparent and accountable structures that work for them.

The purpose of this update report is to provide employees and customers a transparent look into how Metro is measuring up to its values in creating a workplace where everyone can thrive. It highlights several important actions Metro is taking to advance those values.

Of critical interest is an investigative report the EEO Office commissioned to study discrimination and gender inequity in Metro's Vehicle Maintenance (VM) division. The findings are a stark reminder that sexism is real, misogyny and patriarchy are real, and Metro's workforce is not exempt from the harms caused by these systemically ingrained maladies. The findings are a call to action.

Thank you to the many frontline workers and operators who reached out to me this last year to provide feedback and engaged with our Office; especially the women of VM that participated in the investigation. I would also like to thank our partners in Employee Services (particularly the teams in Metro Human Resources and Transit Employee Labor Relations), Equity, Inclusion, and Belonging (EIB), and of course, the staff in the EEO Office for their dedication and work in advancing civil rights and equity for our employees.

Finally, I want to acknowledge that this update relies heavily on a woman-man binary in data reporting and does not adequately account for the lived experiences of our transgender, nonbinary, and gender non-conforming colleagues. This is due to our current limitations of how the federal government and County have traditionally collected demographic information. As the EEO Office grows, we will look for resourcing, strategies, and partnerships to improve the way we report on gender equity.

If you have questions about this report or have suggestions on how we can improve it, please contact the EEO Office at [MetroEEO@kingcounty.gov](mailto:MetroEEO@kingcounty.gov) or (206) 477-9454.

In Solidarity,



Chris Bhang  
King County Metro EEO Officer

# EEO Office – Mission, Vision, and Values

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## Mission

To protect Civil Rights and advance equity for all King County Metro employees.

## Vision

A Metro free of discrimination where everyone can professionally grow and thrive, regardless of who they are and the identities they hold. The Metro EEO Office will do its part to keep our region moving by providing Metro employees and leadership trustworthy information and data to drive equitable employment decisions and policies.

## Values

**Equity.** We name and acknowledge that racism, sexism, ableism, transphobia, and xenophobia are real, systemic maladies that are rooted in our nation's long history and practices of legal segregation, discrimination, and colonization. The knowledge of the past and present effects on the workplace informs our future work.

**Expertise in Civil Rights Law.** We celebrate that Civil Rights laws are monumental achievements of our society, fought for by countless leaders and martyrs of justice, including our County's namesake, the Rev. Dr. Martin Luther King, Jr. We honor their memories with sophisticated expertise in the equal and unbiased application of these laws.

**Compassion.** We listen to the voices and stories of those affected by discrimination with empathy and compassion, regardless of the merits of their allegations. And as a neutral party to these matters, we similarly will treat those alleged to have violated policy or law with equal respect and compassion, knowing that investigations can be a difficult process to experience, and never assuming wrongdoing or intent.

**Transparency.** We practice transparency in our processes, knowing that true transparency leads to accountability. We will strive to ensure that the Metro workforce knows about our policies and procedures in investigations, compliance with federal law, and Metro's EEO Plan. We invite engagement and critique that leads to positive change and innovation.

**Cooperation.** We acknowledge that we are part of a larger structure, where partnership with other departments, leadership, and employees is crucial to translating the information and data we provide into meaningful action. While the Office shall operate as independently as possible and free from outside influence, we value the expertise and cooperation of the many talented professionals throughout King County in doing what is just and equitable.

# Message from Bonnie Davis-Losey

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Hello. My name is Bonnie Davis-Losey. For those that don't know me, I am currently a Vehicle Maintenance Chief at North Base. I joined Metro back in 1998 as a mechanic—and I've seen a lot. A lot of good, but a lot of bad. As a woman, being here as long as I have, I've seen and experienced things that you only see on TV these days. It has been difficult to say the least, but Metro is a place I care about deeply and I care about the women who work here. We do good work. We have amazing teams that are really outstanding mechanics and problems solvers. And at the end of the day, we go home with a good pay and benefits so we can take care of ourselves and our families.

That's why I reported my experience to the EEO Office. Metro is a good place, but it has work to do, and I want to make sure that no one else, and no woman, has to go through what I did: being on the outside of old boy clubs, being talked about behind my back, and not being recognized for my full potential because of my sex. I've been passed up for opportunities, blacklisted, and have seen friends and colleagues driven out because of bullying and harassment.

I reported back in 2020, and nearly three years later we have this report. It took too long to get to this point, but I'm glad that we're here. Even though the investigation and report didn't make all the findings and recommendations I would have liked, it creates a framework for continuous improvement that I think all of us with experience in transit can appreciate and get behind. I may be long retired before the benefits of this work really become a reality, but I'm grateful to have played a part.

Bonnie Davis Losey

Vehicle Maintenance Chief, North Base

# Vehicle Maintenance Gender Equity Investigation

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## About Vehicle Maintenance

Vehicle Maintenance (VM) is one of Metro's largest divisions, employing approximately 850 employees, operating three shifts per day, seven days a week. VM supports Transit Operation's daily requirements for 11,374 trips per week on 190 routes departing from seven transit bases. Its mission is to provide customers safe, dependable, clean transportation in a timely, cost effective, environmentally sensitive manner, with a work force that values teamwork, communication, diversity, equity, and social justice.

VM plays a critical role in Metro's operations and providing services to our customers. VM maintains the safety systems, mechanical systems, and physical conditions of over 1500 buses and 500 other vehicles. VM has also performed other innovative feats including, the design and installation of the [Operator Safety Partition](#), design and creation of the [Lactation Van](#), and the retrofitting of coaches to support the [next generation Orca cards](#).

## Investigation Background

In April 2020, the EEO Office received a complaint of gender discrimination at VM. The complainant also raised several systemic issues relating to the mistreatment of women within the division dating back to 1998. Later in 2020, the EEO Office received other complaints regarding gender equity in the recruitment processes at VM.

In response, in February 2022 after a competitive request for proposal process, the EEO Office retained the services of D Diamond Consulting to conduct a wide-ranging investigation into the systemic issues raised in the complaints. The scope of the investigation included the documentation of relevant historical practices, policies, and trends from 2010 to 2021 regarding: (1) gender/sex discrimination in recruitment; (2) gender/sex discrimination in professional development; and (3) overall hostile work environment.

In November 2022, D Diamond finished their investigation and submitted a report of their findings to the EEO Office. The EEO Office has shared these findings with Metro's Coordination Team and appropriate leadership, including the General Manager and VM Division Directors. Multiple Metro departments and staff have contributed to the development of the cooperative strategies outlines in this report.

## Summary of the Findings

### Methodology and Fear of Retaliation

D Diamond Consulting heavily emphasized qualitative data in their report and centered the voices of those most affected: the women of VM. All women VM employees, across all shifts and bases, were invited to participate in a confidential interview process. Participation was entirely optional. 43 of the 71 invited employees agreed to be interviewed. 17 current male employees also opted in to participate in the interviews. Eight former VM employees, including six women, came forward with information to share directly with the investigators.

Many witnesses said they were concerned that they would be retaliated against for providing input. Some chose not to be interviewed at all for fear of retaliation. Those who did agree to be interviewed were assured that the report would be written without attribution to individual witnesses. D Diamond Consulting also took steps to code their work so individuals could not be identified.

### **Qualitative Analysis and Quotes**

Witness interviews paint a stark reality for women working at VM. While positive comments regarding improvements to working conditions from women were received, the majority of the feedback provided were negative. Nearly twenty pages of the report are filled with quotes from the interviewees covering topics of general workplace environment, the recruitment process, professional development, discipline and grievances, issues with senior leaders, and intersectional experiences with sexual orientation, race, and nepotism. The following is a small but representative sample of the experiences shared with the investigators.

*“KC VM is three decades behind in terms of attitudes toward women. The male employees are not welcoming and constantly talk s\*\*\* about the women.”*

*“I found it shocking and disturbing that ... there was so little diversity in VM. The old guard are set in their ways to keep women from moving forward.”*

*“He [a male coworker] would tell dirty jokes until he provoked a reaction. He would say disgusting, inappropriate things like, ‘It’s hot. You should take off your sweater to show more skin.’”*

*“VM is not a welcoming environment for women . . . I would not encourage women to suffer what I have working here.”*

*“I always felt I had a target on my back and was being minutely observed. Any little, tiny thing always turned into a big deal if you were a woman.”*

*“Men did not like me. I received notes like, ‘just quit b\*\*\*\*, go back to driving or have some babies.’”*

*“The VM old-boys’ management club hires, offers opportunities, and promotes other men and tries to run off any women who are not submissive. When men speak up, they are leaders; when women speak up, they are confrontational.”*

*“A woman having an opinion and being outspoken about it is treated as the biggest crime in VM.”*

*“The stronger, more assertive, more opinionated, strong-willed a female VM employee is, the less she is respected.”*

*“Women are afraid to speak up and file complaints for fear of retaliation.”*

*“I was hired in 1997 and have seen firsthand that female employees have not had the same opportunities and treatment in this male-dominated workplace.”*

*“I do not trust the Human Resources recruitment process. The people who get selected are the ones who have buddies on the interview panel.”*

*“In my evaluations, I was told to be less emotional and more nurturing. The expectation is that I will be a subservient woman, as opposed to an outspoken, confident advocate. Men who are bold and push-bully their way forward are considered good leaders. Women still have to ask permission to be in the room.”*

*“When I told another employee about being harassed at work, he told me to stop talking about what happened. He said stop reporting things you see or hear. My coworker was concerned that people would think I was a snitch and was trying to protect me.”*

*“Management does not take discrimination or harassment complaints seriously and will gaslight people by saying, ‘Oh that’s just how he is. He’s old-fashioned. He didn’t mean anything by it.’”*

*From a male interviewee: “One of the female Chief was overly gay and had a bunch of Pride literature in her shared office, while I was not allowed to post a pin-up of the Snap-On girl in a bathing suit inside my locker.”*

*“Every time I was promoted, I heard people grumbling that I was only given the job as a diversity hire. I never heard any criticism about my performance, just the race issue.”*

*“There is an atmosphere of toxic masculinity, expressed as racism, classism, sexism, and homophobia.”*

*“As a woman of color and an immigrant, I do not feel heard. When I reported concerns about an unsafe work environment, I was ignored.”*

**Data Analysis**

The number of women in VM has remained stagnant at around 10% from 2012-2020. The following is a summary of the percentage of total female VM employees to percentages of female turnover, female hires, and female promotions for the period 2012-2020. 2020 marked an exceptionally high year for female turnover at 16.1% and low promotions at 2.7%; although VM hired 23.2% women that same year.

<b>YEAR</b>	<b>Total Female Employees</b>	<b>Total Female Turnover</b>	<b>Total Female Hires</b>	<b>Total Female Promotions</b>
2012	10.04%	6.00%	10.80%	10.00%
2013	10.00%	7.50%	17.90%	21.40%
2014	9.89%	9.00%	13.30%	10.00%
2015	8.95%	11.70%	3.80%	5.90%
2016	8.17%	8.70%	4.00%	4.80%
2017	8.56%	8.20%	18.20%	5.30%
2018	8.76%	4.70%	13.50%	16.70%
2019	8.45%	6.30%	14.50%	16.20%
2020	9.27%	16.10%	23.20%	2.70%

**Table 1.** Percentage of female employees, turnover rate, hiring rate, and promotion rate in VM from 2012-2020.

The investigators requested significant volumes of data and information regarding recruitments, candidate data, discipline, guidance on scoring processes, and documentation for other HR-related practices. Investigators noted that the Department of Human Resources was unable to provide many of the requested document and information, and much of the data were provided in “data dumps.” The investigators found that:

“[R]aw data within these dumps included data harvested utilizing inconsistent collection methodology, selective collection, and significant duplication of data fields. The investigators asked for but were denied access to NeoGov to pull reports and data related to the systemic allegations directly . . . The investigators considered attempting to create reports from the raw data provided. However, the investigators could not in good conscience spend additional time this way, given the lack of confidence in the quality of the raw data and prohibitive expense to taxpayers.”

### **Conclusions and Findings**

The investigators drew several conclusions and findings from their investigation and experience gathering data including:

- There is no consistent data or data-collection to evaluate VM or Metro efforts to foster a diverse workforce or monitor their Equality and Social Justice initiatives. Administrative roadblocks and gatekeeping by King County Department of Human Resources (DHR) make it difficult or impossible for the EEO Office to access information and databases that are essential for the investigation of complaints and Federal Transit Administration (FTA)’s Equal Employment Opportunity Affirmative Action (EEO/AA) reporting.
- There is no consistent process for recruiting, hiring, promoting, or providing professional development opportunities, which creates distrust and cynicism with employees. Ambiguous recruitment qualifications subject successful women and Black, Indigenous, and People of Color (BIPOC) candidates to being stereotyped as the “diversity hire,” “unqualified,” and “undeserving” of their promotions, thus creating an atmosphere of constantly having to prove themselves in the workplace.
- Business practices have failed women and BIPOC, failed to diversify workforce, and failed to foster an inclusive environment for women and/or BIPOC employees.
- While VM is seeking to “diversify” their workforce, the work culture is not conducive to supporting and retaining a diverse workforce. Women and BIPOC employees are expected to assimilate into the work culture, keep their heads down, and/or “go along to get along” to be successful and navigate the work environment.
- Male-dominated management blames women for not being in the hiring/promotion pipeline (e.g., the work is dirty, heavy lifting, “not romantic,” etc.), while not addressing systemic barriers and an unwelcoming, harsh work culture for marginalized and racialized employees.
- Leadership lacks accountability for fostering an inclusive, equitable work culture and does not hold their direct reports and other employees, within their span of control responsible, for a lack of progress.

- Senior leadership has not recognized or addressed the intersectionality of sexual orientation, race, and nepotism with systemic issues that negatively impact women in the VM workplace.

### **Recommendations**

Based on their findings, the investigators provided several recommendations for Metro and VM, including:

- Building a recruitment pipeline that also includes women and BIPOC candidates that are not performative. VM must intentionally build an inclusive and diverse pipeline.
- Examining and making adjustments to training and qualifications for employment and advancement opportunities, particularly for Utility Service Workers and Equipment Service Workers in the Mechanic Apprenticeship program.
- Explore non-traditional recruitment paths such as area high school career fairs and leveraging the new Free Youth Transit Pass program to invite youth to consider trades as a career path and Metro as an employer. Follow up and invite youth to information sessions to learn more about VM employment opportunities.
- Create goals related to Diversity, Equity, and Inclusion (DEI) strategy, monitor results, and hold the management team accountable.
- Create support network and/or reciprocal mentorship programs for women and BIPOC employees.
- Foster closer collaboration between DHR and Metro's EEO Office in sharing employment data and information.
- Stop studying the situation and take action. Much research and time has already been spent on understanding the problem and developing solutions well before this report was initiated.

# Parallel Findings from the EEO Office

The EEO Office agrees with many of the findings of the investigators from D Diamond Consulting and has come to similar findings through its EEO Program Report, EEO Survey, and participation in DHR’s 2022 EEO/AA Plan. These separate reports reinforce the general findings of the VM investigation that women are underrepresented in the work force (particularly in the trades), that fear of retaliation is high, and confidence in change or that leadership will act is low.

## Metro’s 2022 EEO Program Report

In Metro’s 2022 EEO Program Report, the EEO Office documented the underutilization of women in its workforce. Utilization is the measurement of a workforces’ current demographics compared to what is available for a region and industry. Underutilization is an indicator that conditions exist that are potentially discriminatory or hostile to certain demographic groups in certain job classes, and that steps should be made to see improvements in utilization.

The EEO breaks down workforces into eight categories. Most of VM’s employees are categorized in the Skilled Craft and Service Maintenance EEO categories (Categories 7 and 8, respectively). Currently, in the Service Maintenance, women make up 22.2% of Service Maintenance workers, but only 1% of the skilled Craft category. Over the last ten years, women have consistently made up approximately 10% of VM’s total workforce.

In 2021, Metro underutilized women in its workforce for both the Skilled Craft and Service Maintenance EEO Categories, marking the fifth consecutive year of steady underutilization (see Table 2, below). These percentages translate to Metro having to hire 58 women in the Skilled Craft Workers category and 167 women in the Service Maintenance category to achieve parity.

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%

**Table 2.** Underutilization rates for women and minorities by EEO category for Metro, 2017-2021.

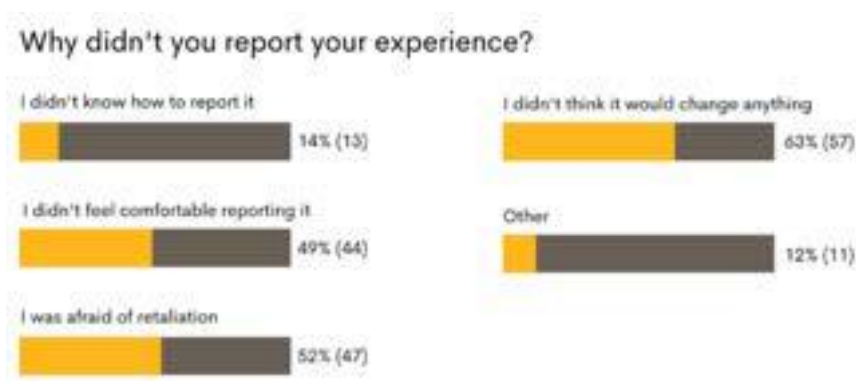
It should be noted that the underutilization of women in the workforce, particularly in the trades, is not unique to Metro. For example, in their last EEO Program Report, LA Metro published that they also had an underutilization of women in six of the eight EEO categories for women with underutilization rates of 14.8% for Technicians, 65.8% for Skilled Workers, and 26.6% for Service maintenance.

## EEO Survey

In partnership with Employee Services (ES), Metro conducted its second annual EEO Discrimination, Harassment, and Workplace Retaliation Survey in October 2022. The objective of the annual survey is to help Metro improve our reporting methods and how we address these experiences in the workplace. The data from the survey helps the EEO Office understand how to improve workplace experiences for employees, informs workplace safety, illustrates the progress we've made, and highlights opportunities for Metro to continue improving. The findings of the Survey aligned with the findings of D Diamond Consulting.

Compared to 2021, more survey respondents (61%) said they knew how to report incidents of discrimination, harassment, and retaliation. However, there were still many (39%) respondents who said they were not sure or didn't know who to report to.

Most survey respondents said they would feel most comfortable reporting incidents of discrimination, harassment, or retaliation to their supervisor or manager, the EEO Office, or Metro HR/Employee Services. 20% of survey respondents said they would not feel comfortable reporting at all.



**Table 3.** Reasons why Metro employees did not report experiences of discrimination or retaliation from the 2022 EEO Survey.

Similarly, in the County's Employee Engagement Survey, Metro scored a 33% in Belief in Action, "a measure of the confidence employees has that managers will on act the result of the survey." While the responses cannot be directly correlated, these independent data points acknowledge that employees may not report because they do not believe that leadership will effectively respond to or act to prevent future incidents. Other top reasons why respondents did not report was because of fear of retaliation or they did not feel comfortable.

# Statement on Intersectionality

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Metro and the EEO Office recognizes that structural oppression “isms” we negotiate within our institutions—racism, sexism, classism, ageism, homophobia, heterosexism, transphobia, colonialism, nativism/nationalism, and colonialism—is fueled by institutional and structural power. Therefore, as a Metro community, it is necessary for us to apply an intersectional analysis that acknowledges the reality that sexism intersects with other types of oppressions, namely race and class. Metro is committed to examining the VM findings with a sophistication that accounts the complexity of the interplay between these “isms” and the diverse identities of Metro’s workforce.

This means confronting sexism in a way that strategically recognizes the impact that identities such as race, national origin or immigration status, and disability have in the treatment of women. As Kimberlé Crenshaw explains, “Intersectionality is an analytic sensibility, a way of thinking about identity and its relationship to power. Originally articulated on behalf of Black women, the term brought to light the invisibility of many constituents within groups that claim them as members but often fail to represent them.” While the VM findings and this report prioritize improving the employment outcomes for women, Metro is committed to carrying out this work with an intersectional lens that accounts for the intersecting experience of women, particularly BIPOC women, who shoulder the double burden of racism and sexism.

# Action Steps to Advance Gender Equity

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## Business Transformation in Recruitment

The VM investigation and other reports made to the EEO reveal the need for a more transparent and standard recruitment process that Metro employees can trust. As demonstrated by many of the comments and attitudes in the report, there is the feeling that VM and Metro still reflect some characteristics of an “old boys’ club” and that it is justifiably difficult for women to trust the current recruitment and advancement processes in place.

Metro Human Resources has secured resourcing for business transformation in recruitment. This work will help King County Metro improve equity outcomes for women in the trades and all employees by making changes to their recruitment processes and policies to create a more inclusive and equitable environment. Here are some ways in which this will be achieved:

- **Standardizing recruitment processes:** By utilizing standardized recruitment processes and tools, Metro will be able to provide candidates with a reliably consistent, fair, and equitable hiring experience. This will be achieved by building standardized recruitment plans within the system of record and utilizing standardized templates and procedures for onboarding, probation, and recruitment implementation.
- **Diversifying the talent pool:** By expanding the pool of candidates from underrepresented groups, organizations can increase the diversity of their workforce. This will be achieved by actively seeking out and engaging with candidates from diverse backgrounds, including through increasing targeted outreach and partnerships with organizations that support underrepresented communities.
- **Reducing bias in the hiring process:** Bias can impact the recruitment process at every stage, from job postings to selection and offers. By implementing measures to reduce bias, such as structured interviews, more diverse hiring panels, standardized panel briefings, and training for recruiters and hiring managers, Metro can ensure that candidates are evaluated fairly and equitably.
- **Building accurate recruitment data:** Getting clean data into the system of record with standardized recruitment processes will allow Metro to create accurate recruitment metrics for leadership and provide accurate data analysis for potential grievances or employee concerns as they arise. It will also allow us to become proactive in our approach to identifying and removing barriers within processes that create inequity within the process.
- Finally, Metro HR is also developing a department-wide standard operating procedures for how to address and prevent issues of nepotism and other actual or perceived conflicts of interest. These Metro-specific procedures will build from King County’s [Code of Ethics](#) and [DHR’s Employment Conflict of Interest policy](#). This work will result in draft policies and procedures and recommendations presented to Metro ES Division Director, HR Manager, and the Organizational Health and Development (OHD) Manager by Q3 2023.

Except for developing the standard operating procedure for nepotism and conflicts, this project will be rolled out in three phases with each phase planned to last approximately 6 months. By making these

changes and committing to ongoing improvement, Metro is aligned and working to create a more equitable and inclusive workplace for all employees, which will have a positive impact on Equity and Social Justice, and overall business performance.

### **EEO to Support the Women of Metro Empowerment Network (WOMEN)**

In the 2023-24 budget, the EEO Office secured funds to address matters specifically arising from its investigations and reporting. As a result of the findings from the VM investigation and data from the 2022 EEO Program Report, \$30,000 of these funds have been devoted to build capacity for the WOMEN Employee Resource Group (ERG) in their mission to support women at Metro, specifically in the trades.

The EEO Office will work with the WOMEN ERG to develop a request for proposals to bring on an external consultant to help build the capacity of the WOMEN ERG and work to improve employment outcomes for women at Metro, particularly in the trades, with an intersectional and equity analysis. Staff from EIB and ES will also be involved in drafting the solicitation documents to ensure alignment with other Metro initiatives and programming. In building capacity, emphasis will be placed on how to include more women across all shifts, physical locations, regardless of access to technology.

The EEO Office recognizes that many of the ERGs would benefit from this kind of investment and will seek to use this process with the WOMEN ERG to develop a practice of providing resourcing to groups, such as ERGs, as a result of its investigations and reporting.

### **Metro Addressing Gender Equity (MAGE)**

In January 2023, Metro retained Reinsel Consulting and Associates to pilot a project to create a Community Practice, specifically for men, to thinking critically about their part in dismantling sexism and gender bias at Metro. This work does not seek to put the focus on men; rather it as it strives to center women, non-binary, and transgender people's experiences. At the heart of this work, MAGE wishes to foster inclusion, respect, safety, accountability, empathy, and compassion in the workplace.

To guide the work of MAGE, in development is an advisory group of employees historically affected by gender bias to direct the work and communities of practice associated with MAGE. This will include collaboration and alignment with Women of Metro Empowerment Network, planning and resourcing leadership development opportunities centering women, transgender and non-binary employees, including identifying, directing, and implementing strategies, activities, practice that fostering emotionally & psychologically safe workspaces for women, transgender and non-binary employees. This is part of larger KC Metro goals and objectives to be a more welcoming and inclusive organization internally among staff and externally with the community we serve.

This pilot is planned to last through 2023, during which time MAGE will plan and facilitate focus groups, stakeholder interviews, implement town hall-style seminars, and develop a final report and recommendations for ongoing cultural change goals, activities, and strategies for Metro leadership.

### **Joining WTS International**

Metro recently became a member of the Women's Transportation Seminar ([WTS International](#)). WTS International is "dedicated to creating a more diverse, inclusive, and equitable transportation industry through the global advancement of women." WTS International seeks to break down historic barriers to entry and obstacles to success within the transportation industry. Through its membership with WTS

International, Metro is now connected to thousands of transportation professionals and resources to enhance the leadership skills and advancement of women in their careers.

## Improvements to the EEO Office

In 2023, Metro will see several significant improvements to the EEO Office and how it advances equality under the law and equity for employees. These improvements are designed to increase trust in the EEO investigative process, improve transparency and accountability in reporting, and decrease fears of retaliation associated with reporting discrimination or inappropriate conduct.

- **Standardized Investigative Procedures and Analysis.** The EEO Office recently completed its first Handbook that details the standard procedures and analysis for receiving, investigating, and analyzing reports of discrimination, harassment, retaliation, and inappropriate conduct. These standard procedures are designed to help build trust and transparency in the EEO Office's trust and demystify its purpose and role in workplace conflicts. With these procedures in place, all matters reported to the EEO Office will be received, addressed, and analyzed in an open and predictable manner. Employees should not feel in the dark after making a report.

The full Handbook will be available for all employees and prospective employees to read [here](#). Simplified and more user-friendly materials explaining the EEO Office's procedures are currently being drafted and produced and will be complete by Q2 2023.

- **The Way We Work Together (TWWWT).** The EEO Office has partnered with the OHD section from ES, who are leading this effort aimed to increase awareness and knowledge how to report workplace discrimination, harassment, and retaliation to the EEO Office and HR Manager in alignment with the Metro's EEO obligations and the County's Nondiscrimination Policy. TWWWT will be a visible campaign complete with graphics, posters, and training modules that bring a needed update and improvement to the current, legal heavy training regimen. The roll out of TWWWT will begin March 2023.
- **Improved Analytics and Regular Reporting.** The EEO Office is currently working with partners in King County Information Technology (KCIT) and the Business Resource Center to improve data presented in the 2022 Program Report. The goal is to create a report dashboard where employment and EEO data can regularly and quickly be generated for study. Many of the improvements were suggested by Metro employee including: disaggregating the data by divisions, inclusions of salary bands, a further breakdown of demographics for the intersection of race and sex, inclusion of discrimination and complaint data, and to make the data generally more digestible and user-friendly. The first iteration of the dashboard is expected to be completed by Q4 2023.

As stated in the introduction, this report, once published every four years, will also be published at least annually at the request of multiple employees and staff. Regular reporting on Metro's employee metrics and programs are meant to improve workplace equity and will increase transparency and accountability.

- **Electronic Case Management System.** Metro received funds in the 2023-24 budget to develop and implement a technology solution for the EEO Office to electronically organize, monitor, and build reports of multiple types of discrimination allegations filed at Metro. This new system will streamline many processes and will be crucial in the publishing of future EEO reports to include accurate data on discrimination complaints and outcomes. A fully implemented system is planned to be operational at the beginning of Q1 2024.

## Measuring Advances Through Data

The preceding action steps represent the urgency needed to address the findings from the VM investigation. The following are some of goals and measurable indicators of success that include both qualitative and quantitative benchmarks. As the EEO Office's data capabilities increase with future iterations of this report, so too should our goals and metrics improve over time. The EEO Office notes data on the efficiency of action steps may not be evident until the steps are fully implemented and given time to have effect, but it is important to recognize and document where the base and starting points are for improvement.

- The underutilization of women will decrease.
- The termination and turnover rates of women will decrease.
- The fear of retaliation as a reason for underreporting discrimination will decrease.
- Knowledge of reporting procedures for discrimination will increase.
- The confidence that Metro leadership will act on reports of discrimination will increase.

# Conclusion & Next Steps

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## Remarks from Tamar Zere, Metro EIB Manager

The Vehicle Maintenance Gender Report is gives us—in real time—the opportunity to learn from history and hold the weight and complexity of a 10-year look-back on workforce inequities within Vehicle Maintenance. While the report daylights many truths, experiences, and challenges VM staff navigates, it also allows us to unflinchingly face the harsh reality many of our colleagues in operations negotiate.

We also recognize that what was revealed at VM will be true for all our divisions and beyond Metro—that is the reality of “ism”. This is work we *all* must lean into.

This report would not be a reality were it not for two pertinent reasons: 1) commitment from senior leadership to grapple with structural oppression at Metro; and 2) the extraordinary participation of an impacted workforce whose continued engagement is necessary for future reimagining of the culture at VM. As we work towards making our four compacts a reality, this report gives us a roadmap for how we can better hire and retain women and BIPOC workers, how we can better grow and invest in our employees, and how we can create the right conditions for all of us to thrive.

## Next Steps & The Inside Long Game

Just as we practice our Long Game through the virtuous cycle of continuously demonstrating that mobility is human right, investing resources to grow capacity, and measuring outcomes, we now need to look inwards and do the same. This “inside” Long Game invites us to recognize that it is a right for all our employees to have the opportunity to thrive in a workplace free from discrimination, and as we invest in programming and capacity to create those conditions, there must be measurable outcomes that we examine regularly to justify further investment or make adjustment.

As demonstrated by the VM investigation, we can measure the harm caused to women in our organization. We owe it to them to measure and demonstrate that we are making progress. Our work in this space cannot be performative.

One of the EEO Office’s functions is to provide Metro the data on these measurable outcomes through its investigations, survey engagement, and EEO Program Reports.

The next steps, then, are to get comfortable with the uncomfortable data, support the actions summarized in this update, measure if our actions are having the intended effect, adjust, improve, and move forward in the “inside” Long Game.





**King County Metro Transit Department  
EEO Office**

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

(206) 477-9454 (TTY Relay 711)

[MetroEEO@kingcounty.gov](mailto:MetroEEO@kingcounty.gov)

# Attachment 11: 2024 EEO Program Report Update



King County Metro

EEO Program Report  
**2024 Update**

March 15, 2024



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

[Metro.EEO@kingcounty.gov](mailto:Metro.EEO@kingcounty.gov)

(206) 477-9454 (TTY Relay 711)

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# Introduction from Metro's EEO Officer

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On behalf of the Equal Employment Opportunity (EEO) Office for King County Metro, I am pleased to present this 2024 Update to our [2022 EEO Program Report](#), marking the third consecutive year Metro has published a report on its EEO programming and metrics for its employees. Normally, these reports are only published every four years and submitted to the Federal Transit Administration (FTA). This report continues the commitment the EEO Office made to building effective and transparent structures to hold Metro accountable to creating a workplace where everyone can thrive.

Last year, in our 2023 Update, we highlighted an investigative report and recommendations coming from Metro's Vehicle Maintenance Division, often referred to as the VM Report. That report brought issues of gender equity to the forefront—with many individuals, leaders, and groups across Metro calling for change, action, and accountability.

In this 2024 Update, we revisit the VM Report and detail many of the actions taken since its publication. Also new for this Update, you will find:

- Complaint Data Received and Processed by the EEO Office
- Enhanced Employment Data, Disaggregated by Race, Gender, and Division
- Updates and Impacts from the EEO Survey

The above additions started as recommendations that came directly from Metro's workforce. Thank you to the **many** public-facing employees and operators who provided critical feedback and their candid thoughts on how we can make Metro work better for them. Thank you for challenging me and the EEO Office to try new things.

As always, I must thank our partners in Employee Services (particularly the teams in Metro Human Resources, Transit Employee Labor Relations, and Organizational Health and Development), and the Equity, Inclusion, and Belonging Team. Special thanks to the County's Department of Human Resources (DHR) team that partnered with us to generate the enhanced employment data. And, of course, thank you to the staff in the EEO Office for their dedication and heart in advancing civil rights and equity for our employees.

If you have questions about this report or have suggestions on how we can improve it, please contact me directly or the EEO Office at [MetroEEO@kingcounty.gov](mailto:MetroEEO@kingcounty.gov) or (206) 477-9454.

Sincerely,



Christopher Takashi Bhang (he/him)

King County Metro EEO Officer

[cbhang@kingcounty.gov](mailto:cbhang@kingcounty.gov) | (206) 263-5580

# EEO Office – Mission, Vision, and Values

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## Mission

To protect civil rights and advance equity for all King County Metro employees.

## Vision

A Metro free of discrimination where everyone can professionally grow and thrive, regardless of who they are and the identities they hold. The Metro EEO Office will do its part to keep our region moving by providing Metro employees and leadership trustworthy information and data to drive equitable employment decisions and policies.

## Values

**Equity.** We name and acknowledge that racism, sexism, ableism, transphobia, and xenophobia are real, systemic maladies that are rooted in our nation’s long history and practices of legal segregation, discrimination, and colonization. The knowledge of the past and present effects on the workplace informs our future work.

**Expertise in Civil Rights Law.** We celebrate that civil rights laws are monumental achievements of our society, fought for by countless leaders and martyrs of justice, including our County’s namesake, the Rev. Dr. Martin Luther King, Jr. We honor their memories with sophisticated expertise in the equal and unbiased application of these laws.

**Compassion.** We listen to the voices and stories of those affected by discrimination with empathy and compassion, regardless of the merits of their allegations. And as a neutral party to these matters, we similarly will treat those alleged to have violated policy or law with equal respect and compassion, knowing that investigations can be a difficult process to experience, and never assuming wrongdoing or intent.

**Transparency.** We practice transparency in our processes, knowing that true transparency leads to accountability. We will strive to ensure that the Metro workforce knows about our policies and procedures in investigations, compliance with federal law, and Metro’s EEO Plan. We invite engagement and critique that leads to positive change and innovation.

**Cooperation.** We acknowledge that we are part of a larger structure, where partnership with other departments, leadership, and employees is crucial to translating the information and data we provide into meaningful action. While the Office shall operate as independently as possible and free from outside influence, we value the expertise and cooperation of the many talented professionals throughout King County in doing what is just and equitable.

# EEO Office – Processes and Function

Entering its fourth year as its own office, the EEO Office has grown to respond to Metro’s need to comply with federal law and advancing equity in the workplace for all employees. This section explains more about what the EEO Office does. If you or your work group have questions or would like an EEO Staff member to give a presentation on the EEO Office’s function, please email [MetroEEO@kingcounty.gov](mailto:MetroEEO@kingcounty.gov).

## The Handbook



The EEO Office published its first Handbook in 2023, which details the standard procedures and analysis for receiving, investigating, and analyzing reports of discrimination, harassment, retaliation, and inappropriate conduct. These standard procedures are designed to help build trust in the EEO Office and demystify its purpose and role in workplace conflicts.

With these procedures in place, all matters reported to the EEO Office will be received, addressed, and analyzed in an open and predictable manner. Employees should not feel isolated or uninformed after making a report or if they are part of an investigation. The full Handbook is available for all employees and prospective employees to read [here](#).

## The Reporting and Investigation Process

The EEO Office created a simplified version of our investigation process into a step-by-step process map. It can be accessed [here](#). The document also contains a Frequently Asked Questions section that explains the basics of what the EEO Office does and how it conducts investigations. A copy is also included at the end of this Report as Appendix B.

The document will walk you through all steps of our process: receiving reports, conducting an intake process, drafting of complaints, providing notices to parties, conducting the investigations, writing findings, and closing out a case.

If your work group would like a physical copy of this poster, please email [MetroEEO@kingcounty.gov](mailto:MetroEEO@kingcounty.gov).



## Coordination Team

The EEO Office continues to convene a Coordination Team that is comprised of leadership from EEO, Employee Services (ES), Transit Employees Labor Relations (TELRL), Human Resources, Equity, Inclusion, and Belonging (EIB), and division leadership, when appropriate. The purpose of this Team is to ensure that all matters reported to the EEO Office are given an appropriate and coordinated response by Metro.

This Coordination Team focuses on highly sensitive and confidential matters arising from allegations of discrimination or data gathered by the EEO Office. The Team focuses on coordinating efforts prior to and during an investigation. Post-investigation action or remedy may be discussed as it relates to an investigative finding, but it is generally not the focus of this Team. This allows the EEO Office to retain its independence to conduct impartial investigations.

## What's New for 2024

- **Case Management IT Solution.** In the last biennial budget, the EEO Office secured \$1.2 million to develop an Information Technology (IT) solution to assist the Office in the administrative and data management of all matters reported and investigated by the EEO Office, with functionality that could be expanded across the County enterprise. In addition to employment complaints, the project was also designed to include complaints filed under the Americans with Disabilities Act and Title VI of the Civil Rights Act, monitor and log reasonable accommodations for people with disabilities, monitor responses to the Federal Equal Employment Opportunity Commission (EEOC), and a possible separate system for DHR's Workforce Equity investigations.

The EEO Office is the project sponsor for this work and is receiving dedicated project management support from the talented professionals in Metro's Technology Project Management Group and the King County Department of Information Technology (KCIT). This project is also guided by a steering committee that includes County experts in civil rights laws, investigations, and information-technology, as well as senior level leadership from DHR and Metro.



After nearly two years of planning and concept design, a contract was signed in November 2023 to build the IT Solution on the Origami Risk platform—the same platform as Metro's SSaM reporting system. The Project will be rolled out in phases, with the EEO Office's portion to be completed for testing by Q3 2024. Completion of this first-of-its-kind unified case management system will mark a major milestone for the EEO Office and County's efforts to creating an efficient and transparent process for conducting investigations and generating reports for truly data-informed initiatives.

- **New Investigator Project Managers.** In 2023, the EEO Office hired two new investigators after receiving budget authority for these full-time career service positions. Investigators are highly skilled and trained in investigative techniques, civil rights laws, and project management. They operate at the highest levels of integrity in handling highly sensitive/confidential information in providing unbiased investigations. Investigators also serve a dual role as Project Managers in affirmatively advancing EEO at Metro. Their projects will begin in 2024 with a focus on recruitment and the Bus Operations Division.
- **Training and Expanded Presence.** With more personnel and updated procedures, the EEO Office staff will begin piloting in-person training and education at bases and other physical worksite locations by the end of Q2 2024. These trainings were developed in response to the needs of Metro employees to know their rights under civil rights law, and will include material beyond nondiscrimination complaints, including how to file for reasonable accommodations for disabilities, how to take protected leaves, and changes in federal law that expand protections for pregnant workers. Providing education to employees on how to exercise their civil rights is

also well in-line with many of the objectives of the gender equity work described later in this report. Please contact the EEO Office to request education and training with our staff.

- **The Second Coordination Team.** Leaders from EEO, Organization Health and Development (OHD), and EIB have begun convening regularly to coordinate efforts and strategies related to improving conditions for workgroups and throughout Metro. This team operates separately and independently from the original Coordination Team and does not discuss individual complaints of discrimination or sensitive matters that arise from investigations.

## Answering Your Questions

The EEO Office continues to receive many questions about its process and operations, many of which are not addressed in our other materials. Here are some important questions we've received and the answers. If you have other or more questions, please contact our Office.

- **Q: Why did the EEO Office publish the VM Report but not other reports?**

The VM Report was published for several reasons. First, because of the wide-reaching implications and impact of the study—dating back 10 years into one of Metro's largest divisions. From the beginning, the investigation was purposefully publicized as a matter of transparency, to reduce the potential of retaliation through widely-distributed communications. The EEO Office committed to ensuring that the findings would be accessible to all Metro employees. Second, the investigation did not involve any specific Respondent; meaning, no one individual was accused of having violated EEO law or the Nondiscrimination Policy. Finally, the EEO Office acted as the Complainant; meaning, no one individual was responsible for the commencement of the investigation. The EEO Office does not distribute findings to individuals, workgroups, or division leaders unless they have a legitimate need to know to protect the privacy of the individuals involved.

- **Q: Why does the EEO Office investigate some cases but not others even when there is clearly a toxic environment workplace?**

The EEO Office has very specific jurisdiction or authority when it comes to investigations. The EEO Office can only investigate matters if it involves a protected class or classes. Protected classes are things about you that you cannot nor should not have to change about yourself, such as race, religion, national origin, gender, and disability, which have been historically used to justify discrimination against groups of people.

While bullying and toxic behaviors have no place at Metro or the County, matters like this fall outside of the EEO Office's jurisdiction unless the unwanted behavior is connected to a protected class.

- **Q: Why doesn't the EEO Office discipline people who discriminate against or harass other employees?**

First, the EEO Office does not have authority to impose discipline or make changes to Metro or County policies. Second, the EEO Office must remain neutral and is not involved in the implementation of discipline or other remediation after an investigation. While the EEO Office can give context regarding its findings, decisions to take disciplinary action are made properly by Human Resources, Employee

Services, Labor Relations, and appropriate division leadership to ensure proper procedure is followed and labor agreements are honored.

- **Q: Will I find out what happened after an investigation?**

This depends on your role in an investigation. Complainants and Respondents are always given closure notices and the opportunity to meet with an investigator to discuss the outcome of the investigation. Witnesses, however, are usually not provided updates after an investigation. For privacy reasons, the EEO Office only shares investigative information with individuals who have a legitimate business reason to know.

- **Q: Why can some people voice their opinions about national or world events, but others can't because it might be called discrimination? Where does EEO draw the line?**

The EEO Office does not take a stance on national or world events to remain a neutral fact finder in investigations. However, actions taken against someone on account of their protected class that may have arisen because of outside events could constitute a violation of EEO law or the Nondiscrimination Policy.

As an example, if an employee voices support for a group of people or criticizes the actions of a nation or government, that person probably has not engaged in discriminatory or harassing conduct. However, if that employee says to their colleagues that “all people of X country are terrible humans” or begins to call for violence or action against a group of people, that would likely be a violation of our Nondiscrimination Policy because it “communicates a derogatory, unwelcome, or negative message about persons based on a protected status [nation of origin].”

If you experience or witness mistreatment because of who you are, your faith, or where you are from, please report it right away to the EEO Office by emailing [MetroEEO@kingcounty.gov](mailto:MetroEEO@kingcounty.gov) or Transit HR at [TransitHR@kingcounty.gov](mailto:TransitHR@kingcounty.gov). Please contact us if you have questions about how our Nondiscrimination Policy can apply in situations like these.

- **Q: Why should I trust the EEO Office when I feel like it has been weaponized against certain individuals or workgroups?**

Weaponization is improper and the EEO Office condemns any action to subvert its role as a neutral factfinder in investigations. The EEO Office cannot prevent anyone from exercising their rights to file a complaint of discrimination or harassment; however, with its robust intake and investigative procedure, the EEO Office provides all parties a transparent, predictable, and trustworthy process that ensures all matters that comes to the Office are appropriately addressed.

The Office also vets all claims through vigorous screening and legal analysis. The EEO Office encourages all employees and prospective employees to learn about how its process protects both those making complaints and those who are the subject of complaints, by sharing their comments, critiques, and questions.

# EEO Survey and Measuring Progress

Through the leadership of the Systems and Information Management Team in ES, Metro conducted its third annual EEO Discrimination, Harassment, and Workplace Retaliation Survey in 2023. The objective of the annual survey is to help Metro improve reporting methods and how we address these experiences in the workplace. The data from the survey helps the EEO Office and Metro understand how to improve workplace experiences for employees, informs workplace safety, illustrates the progress we've made, and highlights opportunities for Metro to continue improving.



SINCE METRO'S FIRST INTRODUCED THE SURVEY IN 2021, THE NUMBER OF COMPLETED SURVEYS HAS MORE THAN TRIPLED WITH 1,693 RESPONSES THIS YEAR.

In last year's update, the EEO Office noted specific trends by which success and progress could be measured (outside of the employment data described in later parts of this update) including:

- The fear of retaliation as a reason for underreporting discrimination will decrease.
- Knowledge of reporting procedures for discrimination will increase.
- The confidence that Metro leadership will act on reports of discrimination will increase.

Data from this year's survey indicated significant improvement in the first bullet points. Highlights include:

- **Increased Participation and Turnout.** The survey was shared via email, printed flyers, and at tabling events at 25 Metro worksites and locations. Participation has steadily increased from 10% (2021), to 14% (2022), to 33% (2023). Since Metro first introduced the Survey in 2021, the number of completed surveys has more than *tripled* with 1,693 responses this year.

Participation across Metro included a 27% increase in Bus Operations, a 33% increase in Facilities, and a 23% increase in Marine.

- **Increase of Knowledge of How to Report.** The percentage of folks who said they knew how to report discrimination, harassment, and retaliation increased from 61% in 2022 to approximately 69% in 2023.
- **Comfort in Reporting.** The percentage of respondents who said they would be comfortable reporting discrimination, harassment, and retaliation increased in almost every category (own supervisor, another supervisor, Metro's EEO office, human resources, etc.). The percentage who said "they were afraid of retaliation" or "didn't feel comfortable" both dropped by 19%.

The EEO Office is extremely grateful to the participants who provided this valuable data and feedback, and for the many volunteers who worked with the Systems and Information Management Team to ensure that all Metro employees had the opportunity to participate. The EEO Office looks forward to continuing this collaborative work in service to our employees.

# EEO Limitations and Representation in Data

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The EEO Office recognizes that the language used in this report is limited and does not adequately represent the many people groups, cultures, gender identities, and lived experiences that make up the Metro workforce. In fact, some language used may be construed as outdated and inaccurately reflects current understanding of society and people.

**WE CAN AND MUST DO BETTER IN HOW WE TALK ABOUT PEOPLE AND CREATE NARRATIVES THROUGH DATA.**

The EEO Office uses this language and categories of people because of its reporting requirements to the FTA. People groups such as “females”, “minorities”, and the broad racial categories are what the FTA requires Metro to report on, and the various personnel systems at the County were built to collect the demographic data in this way.

This does not mean that this is how it always has to be. In fact, in line with the recommendations from King County’s [Gender Identity and Sexual Orientation Inclusions Task Force](#), Metro’s Employee Service’s team is leading the Modernizing Employment Demographics Project to address this very issue. See page 10 in the Next Section for more information.

Representation in data and reporting is not just about numbers or compliance with EEO law; it is about ensuring that no one’s identity is erased and people are seen as full humans. It has always been a tactic of oppression and hate to minimize the humanity of others; by doing so, it becomes easier to harass, bully, vilify, and harm. We can and must do better in how we talk about and create narratives through data. The EEO Office will continue to work with its partners to create reliable data sets that better reflect our workforce.

# Updates on Advancing Gender Equity

## Introduction

In 2022, the EEO Office commissioned a report prepared by D Diamond Consulting to document relevant historical practices, policies, and trends from 2010 to 2021 regarding gender and sex discrimination and allegations of the presence of a hostile work environment in the Vehicle Maintenance (VM) Division. The investigators drew several conclusions and findings from their investigation and experience gathering data. Many of the investigation’s findings paralleled the EEO Office’s data on underutilization of women in the workforce, unfamiliarity with reporting process, and fear of retaliation.

Recognizing the call to action and realizing the findings from VM impacted all of Metro, Metro Leadership and the EEO Office immediately began to strategize and put forth tangible steps for Metro to take in response. This section provides updates to the Action Steps listed in the 2023 Update, and reports on additional action and programs put in place to advance gender equity at Metro.

## Studying the Solutions – Women at Metro Needs Assessment

In Q4 2023, the EEO Office retained the professional services of Aline Carton-Listfeld in its commitment to providing direct support to the Women Of Metro Empowerment Network (WOMEN) employee resource group (ERG) in response to the VM Report. Aline is an organization development practitioner, certified leadership coach, and change management practitioner with the Department of Human Resources’ (DHR) Career and Culture Division. Among its key functions, DHR’s Career and Culture Division deploys experts in organizational development strategies to departments throughout the County to advise and develop practices that promote a healthy and productive workplace.

“THOSE THAT ARE CLOSEST TO THE PROBLEMS ARE OFTEN THOSE THAT ARE CLOSEST TO THE SOLUTIONS”  
-ALINE CARTON-LISTFELD

Aline was selected after a months-long process working directly with the WOMEN ERG and other Metro women, primarily those who work in public-facing and essential service positions, to develop a scope of work and project charter. This process resulted in this Needs Assessment that Aline is leading with support from multiple Metro divisions, including OHD, EIB, and EEO, and is sponsored by Metro’s Assistant General Manager for Employee Services.

This Assessment is the counterpart to the VM Report. In that process, in close partnership with VM Division leadership, intentional efforts were made to ensure the voices of women in VM were heard to provide qualitative data to document the realities of their experiences. In this current Assessment, equally concerted efforts are being made to ensure that Metro documents solutions and ideas shared by the women in our workforce, with a more expansive focus in the VM, Rail, Facilities, Bus Ops, and Marine Divisions.

From the Assessment’s Project Charter:

In the spirit of supporting all employees and in alignment with the report recommendations, the purpose of this project is to assess the needs of Metro employees who identify as women

(including persons who align with or have lived experience with being gendered female, including transgender women, nonbinary, and those assigned female at birth) to help reveal sustainable institutional solutions resulting in measurably improved workplace experiences for all women at Metro. Examples of needs may include, but are not limited to, training, professional development, skill building, career advancement, ERGs, and other positive workplace community networks of support. It will intentionally focus on women of color in public-facing and essential service positions and women in the trades, with the theory that when these women feel supported by our workplace systems and culture, then all women at Metro will benefit.

This Assessment is expected to be completed in the summer of 2024. The results and findings of this project will be included in the 2025 Update. The findings and results from this assessment will be used to inform budget/resourcing decisions and the strategic alignment and prioritization of other Metro priorities aimed at advancing gender equity in the workplace.

**To Participate in the Assessment:** Participation is optional and is focused on women employees at Rail, VM, Bus Ops, Marine, and Facilities. Employees may complete an anonymous survey here or by scanning the QR Code to the right. Answers will remain confidential and all employees who participate in the Assessment are protected from retaliation.



Aline and her team will use various on-location methods for participation at the five named divisions. Please email Aline directly if you want more information on how you can participate in the Assessment or if you have questions at [acartonlistfjeld@kingcounty.gov](mailto:acartonlistfjeld@kingcounty.gov)

## Building a Gender Equitable and Inclusive Workplace Supervisor Training

Throughout 2024, OHD will be providing a training for people leaders in all divisions called, *Building a Gender Equitable and Inclusive Workplace: Supervisor Training*. This training is designed to support leaders' ability to recognize the role gender bias and sexism has on disparities in our workforce, and to understand their responsibility as a people leader to create equitable work environments for their teams. This training provides people leaders/supervisors a deeper understanding in gender, gender identity inclusion, and in setting workplace expectations for staff.

## Modernizing Employment Demographics Project

While King County provides guidance and protections through its [Gender Identity in the Workplace Policy](#), Metro employees face challenges in owning and expressing their gender identity and having their name consistently reflected in the workplace. This inconsistency and uncertainty causes harm to transgender and non-binary employees and/or their dependents, as they are frequently required to deal with challenges and inquiries about their identity, particularly during the onboarding process, or changes in employment or benefits.

Currently, King County forms and employee data collection instruments do not reflect gender markers beyond male or female. This binary gender option excludes employees who have a legal gender marker designation of X and does not provide an opportunity to accurately reflect the gender identities of the employees of King County, specifically transgender women, transgender men, and non-binary employees and/or their dependents.

Additionally, Metro employees do not have a clear awareness of how their gender markers are used, tracked, or communicated, nor provided instructions on how to update their gender marker, change their first and/or last name, or use a preferred name. When a name or gender marker is requested on forms and documents, it is unclear when employees are required to use their legal name or the gender marker listed on a particular federal or state identification, rather than their preferred or accurate identifying information. This is true for both the variety of forms used to onboard new employees, as well as additional forms used over the term of employment. Different divisions and roles may track information separately and differently, and several different databases exist for these purposes. Third party vendors also have their tracking systems, which may change based on external communications with the employee as well as communication with Metro and its systems.

CURRENTLY, KING COUNTY FORMS AND EMPLOYEE DATA COLLECTION INSTRUMENTS DO NOT REFLECT GENDER MARKERS BEYOND MALE OR FEMALE.

The Modernizing Employee Demographics Project, launched in Q3 2023, is intended to set the foundation needed to support employees in expressing their gender and name accurately, and their gender being reported and tracked in alignment with their identity. This project is identifying gaps, duplication, and opportunities for improvement. The recommendations report, expected in Q2 2024, will offer steps to improve employees' experience, and allow employees to better control communication about and monitoring of their own identity. An iterative, continuous improvement process over time, following adoption, should ensure employees' needs are met and harm is greatly reduced. Finally, King County's employee data will reflect the gender identities of transgender, non-binary, and those who use an X gender marker, therefore accurately reflecting the communities Metro and King County serve.

## Business Transformation in Recruitment

The VM Division investigation and other reports made to the EEO revealed the need for a more transparent and standard recruitment process that Metro employees can trust.

The Metro Human Resources team, in collaboration with the Talent Acquisition Team, secured resources to drive business transformation in recruitment. This initiative aims to enhance equity outcomes for women in the trades and all employees by reforming recruitment processes and policies to foster a more inclusive and equitable environment. The Talent Acquisition Team remains committed to advancing the following objectives, as outlined in the previous year's report:

- **Standardizing recruitment processes:** Embracing standardized recruitment processes and tools enables the Metro's Talent Acquisition Team to offer candidates a consistently fair and equitable hiring experience. This involves developing standardized recruitment plans within our system of record and employing uniform templates and procedures for onboarding, probation, and recruitment implementation.

- **Diversifying the talent pool:** To promote workforce diversity, the Talent Acquisition Team has worked through standardization to expand the standard outreach planning for all recruitments to include activities that work to expand the pool of candidates from underrepresented groups. This includes engaging with candidates from diverse backgrounds through targeted outreach and partnerships with organizations supporting underrepresented communities.
- **Reducing bias in the hiring process:** Bias can undermine the fairness of recruitment, from job postings to selection and offers. Through Business Transformation efforts, the Talent Acquisition Team continues to address this challenge by implementing measures such as structured interviews, diverse hiring panels, standardized panel briefings, and providing training for recruiters, removing employment barriers (such as tests that are not tied to core job functions), creating more inclusive language in job postings, and working with hiring managers to ensure equitable candidate evaluations.
- **Building accurate recruitment data:** By establishing clean data within our system of record through standardized recruitment processes, we can generate more precise recruitment metrics for leadership and conduct accurate data analysis for addressing potential grievances or employee concerns. The Talent Acquisition Team is now working proactively in partnership with division leadership and hiring managers to identify and remove barriers that create inequities in the recruitment process.
- **Developing department-wide standard operating procedures:** The Employee Services Division is working on comprehensive standard operating procedures (SOPs) to address and prevent nepotism and other actual or perceived conflicts of interest. These Metro-specific procedures will build from King County's [Code of Ethics](#) and [DHR's Employment Conflict of Interest policy](#). In addition, updating our library of standard operating procedures is at the top of the list of priorities on our strategic plan in 2024 to create consistent and fair processes.

In alignment with Metro values, ongoing continuous improvement work through business transformation is in progress. This initiative, excluding the development of SOPs for nepotism and conflicts, is an integral part of our business transformation efforts. By implementing these changes and committing to continuous improvement, Metro is actively working towards fostering a more equitable and inclusive workplace for all employees. This dedication will positively impact Equity and Social Justice (ESJ) initiatives, as well as overall business performance.

## VM Project Management Resourcing

In late 2023, EIB leadership secured funds to support a new position dedicated to promoting gender equity at Metro. Through a competitive hiring process, Tareca Choi was selected to fill this critical role. In this newly created position, Tareca is focused on internal work as a partner and consultant on the Gender Equity Initiative in the VM Division. Tareca facilitates, coordinates, and implements key equity and belonging projects in partnership with EIB, VM Division leadership, employees, and union leaders.

Among her portfolio, Tareca is leading two projects with direct connections to the equity outcomes sought by the EEO Office. The first project is an inventory and analysis of current outreach and recruitment efforts. The second project is related to the *Making Metro Family Friendlier* work (described

below), where Tareca will focus on the requests that require long-term planning and matters that may require resolution at the bargaining table.

Tareca brings over 15 years of experience working with public and private organizations in EEO and EIB, including experience as a program manager in government and the construction industry. Tareca is a graduate of the University of Washington and a veteran with a distinguished career in the Active-Duty Air Force and the Washington Air National Guard.

## **Making Metro Family Friendlier Meetings and Requests**

In May 2023, several women met with leadership from Metro and the Amalgamated Transit Union (ATU) 587 to discuss and raise their serious and well-founded concerns about how Metro treats women, especially those with responsibilities to care for children and families. In September 2023, the same group convened again where Metro provided updates to the requests, strategically categorizing them into a plan of action.

Many of the requests were aligned with the actions reported in this Update, including: more training on rights and benefits for employees (including how to take leave and rights for pregnant workers) and retaining personnel to project manage longer-term recommendations. Metro leadership was honest about the realities that some requests were not possible, such as one-time COVID childcare subsidies; and that some requests would have to be explored with our labor partners in contract negotiations.

The EEO Office and Metro leadership are grateful for the women who initiated these meetings and made the requests. The conversations were sobering, but an important step in holding Metro accountable for making the workplace a place where everyone has the opportunity to thrive.

## **Communities of Practice – Undoing Gender Bias**

In January 2023, in partnership with Metro’s General Legal Counsel, EIB, and the EEO Office, Metro’s Organizational Health and Development (OHD) team launched a pilot project focused on supporting Metro’s leadership in addressing practical approaches to enhance and support gender equity in the workplace. OHD retained the professional services of Martin “Marty” Reinsel of Reinsel Consulting to partner in leading this effort. Marty is a clinical educator, licensed therapist, and has over 25 years of experience providing agencies support in large, culture-shifting projects through the lens of equity, inclusion, and safety in all its forms.

Marty provided consultation and direction to Metro’s leaders who were prepared to begin the steps towards making Metro a more just and equitable workplace for women, non-binary, and transgender employees. The group would be identified as a Community of Practice (CoP) initially titled *Metro Addressing Gender Equity (MAGE)* but would later be renamed as *Undoing Gender Bias: CoP for Male Leaders* to better reflect the work of the group.

The CoP’s monthly meetings began on January 23, 2023, and centered on the experiences, insights, and perspectives of women, non-binary, and transgender individuals. Some highlights and focuses of the year included:

- Promoting tangible and specific “Values, Principles, and Practices” for successfully navigating complex workplace situations involving possible gender inequities.
- Identifying and defining key concepts to promote workspaces that are more psychologically and socially safe, promoting growth-mindset approaches for managing desired changes to workplace culture.
- Fostering trauma-informed, compassionate, and non-judgmental communication practices as models of how best to approach workplace challenges related to gender inequity, harassment, discrimination, and/or retaliation; consistent with Titles VI & VII of the 1964 US Civil Rights Act.
- Introducing Accountability Partners to meet separately and promote peer-based collaboration.
- Reinsel Consulting also met with the Marine Division staff in May 2023 per recommendations from Metro leaders, due to Marine’s interest in more gender-equity actions for their division.

“THE BURDEN FOR DISMANTLING GENDER BIAS AND ADVANCING GENDER EQUITY IN THE WORKPLACE HAS DISPROPORTIONATELY FALLEN ON WOMEN LEADERS AT METRO, PARTICULARLY BIPOC WOMEN LEADERS.”

The CoP pilot successfully ended in December 2023 with plans to launch a second cohort in Q2 2024 based on the feedback and learnings of the pilot.

Metro’s OHD Leadership Development Program, in collaboration with EIB , is developing a Community of Practice (CoP): **Building Up for Women Leaders**. The burden for dismantling gender bias and

advancing gender equity in the workplace has disproportionately fallen on women leaders at Metro, particularly BIPOC (Black, Indigenous, People of Color) women leaders. Women leaders have been asked or placed in positions where they feel responsible for improving their own or others’ experiences without resources or training.

This new CoP will help expand and strengthen leaders’ capacity to facilitate fruitful conversations around gender bias, gender inequity, and the intersectionality of gender and race in our workplace culture. Through this CoP, women leaders will be equipped with additional tools for continuing to advance healthy workplace culture and practices for gender equity and ensure they are supported in meaningful ways. The CoP will center intersectionality and anti-racism. Not only are cis and transgender women welcome, but also non-binary and AFAB (assigned female at birth) trans staff. The focus of these sessions will be the gendered female experience and building capacity and the skillset to address that experience for self and others.

If you have questions about the pilot, CoPs, or opportunities to get involved, please email Metro’s OHD Team at [MetroOHD@kingcounty.gov](mailto:MetroOHD@kingcounty.gov).

# Complaint and Investigation Data

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This section focuses on the workplace investigations conducted by the EEO Office’s Investigation Team and the data collected through its complaint and investigation process.

In 2023, the EEO Investigation Team worked to make significant improvements to increase trust in the EEO investigative process, improve transparency and accountability in reporting, and decrease fears of retaliation associated with reporting discrimination or inappropriate conduct. In addition to the new programs and features in this Update, other highlights from 2023 include:

- Eliminating a case investigation backlog that reached back to 2020, and now has the lowest active caseload since the EEO Office was created.
- Hiring two new EEO Investigators to ensure that employee EEO concerns are addressed in a timely and thorough manner.
- Completed and personally addressed 159 inquires brought forward by individual employees.
- Implementing a new investigative process and tracking methods to provide Metro reliable data on complaint trends. Read more below.

## Introduction to the Complaint Data

One area the EEO Office focused on in 2023 was working to make EEO investigation data more transparent and available to all employees. While this is just the first step in improving the methods the EEO Office uses to convey and make this information available and accessible, this data below provides information regarding the number of cases opened by the EEO Office, the divisions where the complaints originated, and a breakdown of what protected classes were involved in the allegations.

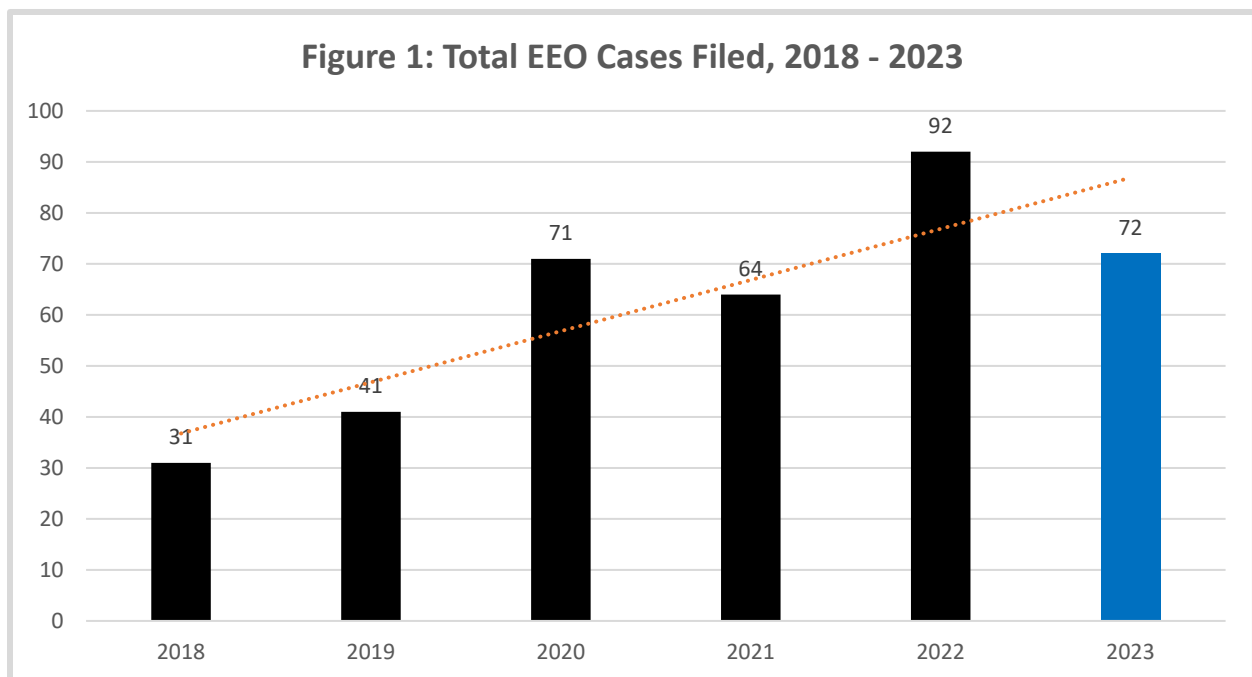
When viewing the data below, it is important to note:

- Prior to 2023, the EEO Office did not have standard procedures to measure and track discrimination data. Thus, data from 2018-2022 is provided with less specificity because the data is less reliable and is provided as general information.
- A case in this section, refers to any matter that came to the EEO Office that was connected to a protected class and went through a screening and intake process to determine the appropriate next steps, including a formal investigation. A person could contact our office, but it would not be referred to as an EEO case. Example: a person reports they were not paid on time, but does not allege discrimination would not be categorized as a case, and would be referred appropriately.
- The EEO Office expects that the growth in the number of cases will continue into 2024 as the EEO Office plans to make employee engagement a key area of focus by being proactive in working to create resources to ensure that employees are aware of their rights.

## Data on Cases Filed

**Increase of Total Cases Filed.** Over the last six years, the EEO Office has seen a general increase in the total number of cases filed with a nearly three times increase from 2018 to 2022 (see Figure 1 below). This increase in cases and reports to the EEO Office can be attributed to the intentional efforts to encourage reporting through *The Way We Work Together* training and dissemination of EEO Program materials.

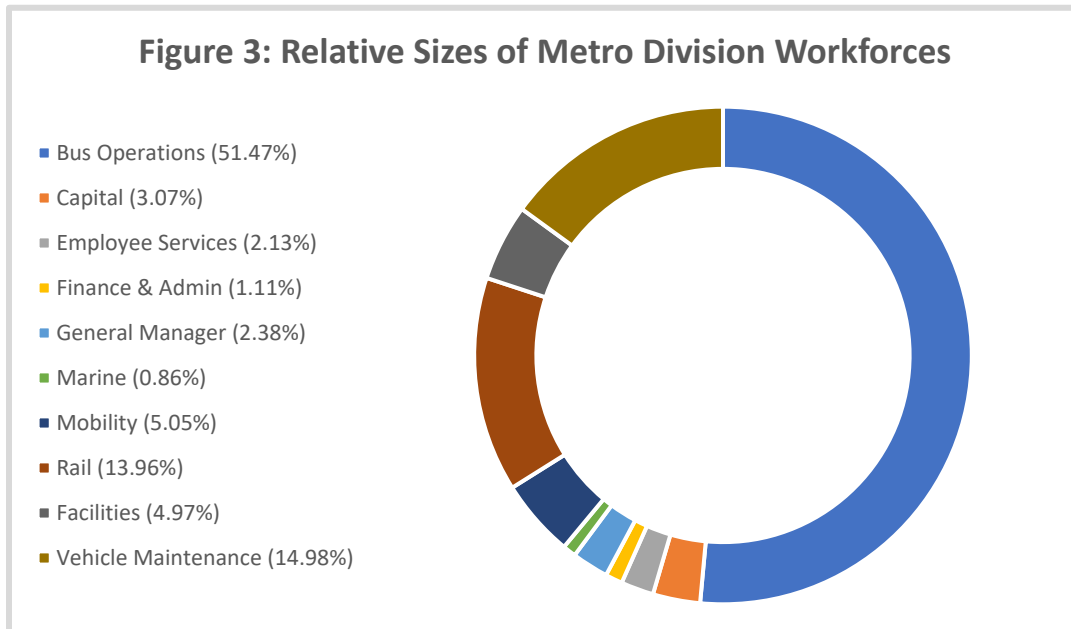
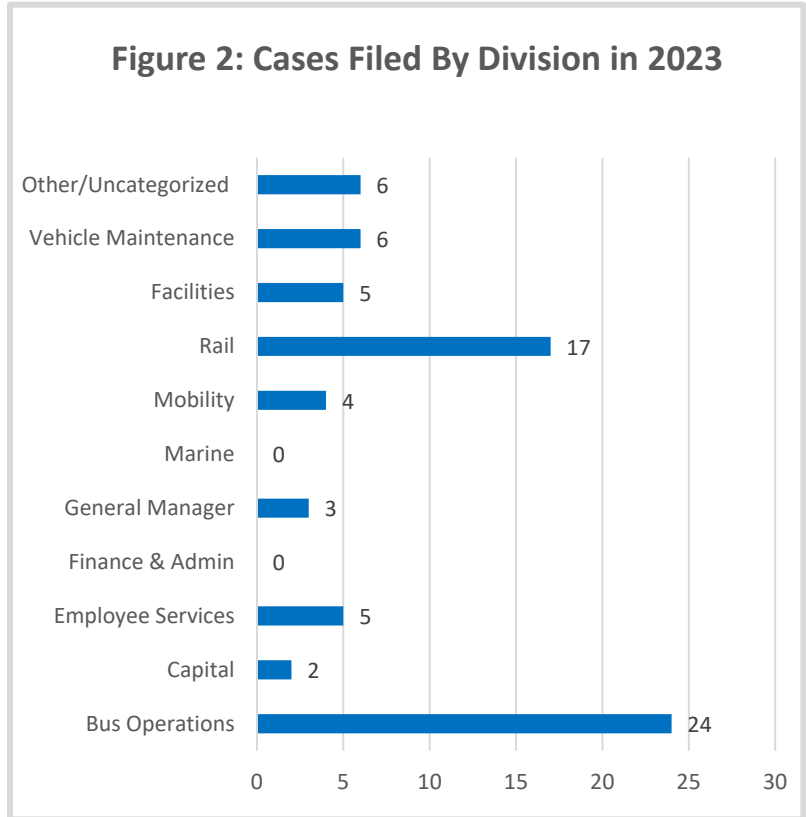
The EEO Office does not interpret increased levels of reporting and cases filed as a negative sign; rather, because there were not as robust efforts to educate the workforce on the EEO Office, the data can be interpreted as positive sign that our data is becoming more reliable.



**Cases Filed in 2023.** The new standard procedures implemented in 2023 adjusted how inquires and allegations were categorized in a newly developed intake process. This had an impact on the total number of cases filed in 2023. In 2023, the EEO Office reviewed 159 inquires, many of which in previous years would have been counted in the case totals. So even though the total number of cases appears to have decreased from 92 in 2022 to 72 in 2023, the EEO Office processed and addressed *more* matters in 2023 than in previous three years combined.

**Total Cases Filed by Division.** Of the 72 cases filed in 2023, most cases were reported from divisions with more employees, specifically those in public-facing and skill trades-based positions. As explained above, data from 2018 to 2022 was collected inconsistently and is not presented here.

The fact that one division has more complaints does *not* mean that more violations have occurred in that division. The EEO Office receives and analyzes all complaints seriously, and does not attribute a negative inference to divisions if there is a high concentration of reports; rather, as explained above the EEO Office acknowledges how difficult it can be to bring concerns forward and has a positive regard for workgroups that know how to follow proper reporting procedures and alleviating the fear of reporting.



**Cases Filed by Division Adjusted for Division Size.** Figure 3 show the relative sizes of the Metro Divisions. This information can be helpful in framing how many complaints are filed within each division. For example, while most cases originated out of the Bus Operations Division (24 cases account for 33.3% of all cases), the Bus Operations Division accounts for well over half of Metro’s total workforce at

51.47%. So the relative number of cases coming out of Bus Operations in 2023 is actually less than what might be expected based on the size of the division. Conversely, the General Manager’s Office and Employee Services had few cases filed, but actually had more cases filed in 2023 compared to the relatively smaller sizes of their workforce.

**Figure 4: 2023 Cases Filed by Protected Class**

Race/Color	33
Sex/Gender	16
Religion/Creed	4
Disability Status	4
Marital Status	0
National Origin	2
Pregnancy Status	0
Gender Identity and Expression	1
Genetic Information	1
Sexual Orientation	4
Veteran/Military Status	0
Use of Service Animal	0
Other protected class status	0
Age	3
Unknown	4

**Cases Filed by Protected Class.** In 2023, the majority of cases filed with the EEO Office were related to a persons’ race or color, followed second by race and gender. Other cases were filed under religion/creed, disability status, sexual orientation, and age, with few cases filed under national origin, gender identity and expression, and genetic information.

# Workforce Analysis

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This section provides an update on Metro’s progress on achieving its employment placement goals, and further explores the demographics of our workforce by division, race, and sex. The EEO Office could previously only report on demographics by race or gender but can now report on the intersection of race and gender. This development in analytics will be essential in ensuring we are strategically investing where our needs are greatest.

## Calculating Underutilization and Placement Goals

Metro’s utilization analysis and placement goals were developed by DHR with the assistance of a software called CAAMS. DHR first determined if there was an underutilization of a demographic by comparing the actual number of employees in an employment category versus the expected number of employees that would be in that category based on local demographic employment data. In addition to goals set by CAAMS, DHR employed a modified version of a whole person rule, where:

**If (Number of Expected Employees) – (Number of Current Employees) > 0.5, then a placement goal is created rounding up to the nearest whole number.**

Where underutilization is identified, the FTA requires that short and long-term 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 monitoring progress and achieving equal opportunity for *qualified* women and people of color (minorities) as positions are available.

These goals are set when Metro renews its EEO Program every four years for submission and approval by the FTA, so progress is measured against the goals set in 2022. Metro’s goals are now aligned with those found in DHR’s 2022-2025 Equal Employment Opportunity/Affirmative Action (EEO/AA) Plan for the County, available [here](#).

## EEOC Job Categories

For reporting to the FTA, the Metro workforce is divided into Job Categories defined by the EEOC. EEO Job Categories (also known as Job Groups) are a means to separate various occupations into groups based on job title, skill and knowledge, requirements, and level of institutional responsibility.

Metro has employees and reports on six of the Job Categories: Officials and Administrators, Professionals, Technicians, Administrative Support, Skilled Crafts, and Service Maintenance.

## Progress on Metro’s 2022 Placement Goals

Demographic Group	Officials and Administrators			Professionals			Technicians		
	Goal	2022	2023	Goal	2022	2023	Goal	2022	2023
Asian	1	1	1	18	36	86	1	0	1
Hispanic	1	1	1	9	18	33	2	1	2
Black									
Native American				4	4	6			
Pacific Islander				2	4	9	1	0	0
Two or More Races	1	0	1				1	0	1
Female							2	1	1

Demographic Group	Administrative Support			Service Maintenance			Skilled Craft		
	Goal	2022	2023	Goal	2022	2023	Goal	2022	2023
Asian									
Hispanic	4	5	7	13	17	35	10	16	37
Black							40	28	71
Native American									
Pacific Islander									
Two or More Races				19	14	31			
Female				319	59	139	55	7	25

**Figure 4:** Placement goal progress for years 2022 and 2023. Grey sections indicate no placement goal was set in 2022. Blue sections indicate Metro achieving its placement goals. Green sections indicate Metro exceeded its placement goals. Red sections indicate that Metro has not achieved its placement goals.

As of December 31, 2023, Metro had achieved or exceeded 15 of its 19 placement goals.<sup>1</sup> Four goals were not achieved for the following groups: Pacific Islander technicians, Female technicians, Female service maintenance, and Female skilled craft. Notably, the under-utilization of women in the trades continues to be an area of focus as progress to achieve the placement goals is less than what would be expected halfway through the four-year reporting period.

It should be noted that the underutilization of women in the workforce, particularly in the trades, is not unique to Metro. For example, in their last EEO Program Report, LA Metro published that they also had an underutilization of women in six of the eight EEO categories for women with underutilization rates of 14.8% for technicians, 65.8% for skilled workers, and 26.6% for service maintenance.

<sup>1</sup> Metro’s progress in 2022 was incorrectly reported in DHR’s 2023 EEO/AA Program Update. The data found in this report has been validated as accurate by DHR and should be used in future reporting.

# Workforce Demographics

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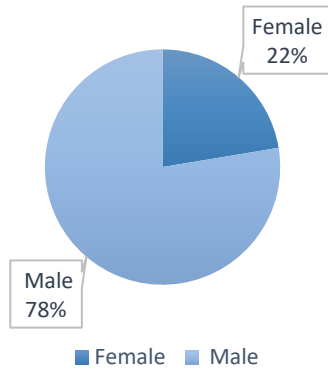
This section provides a snapshot of the demographic makeup of Metro and all its divisions. Raw data was received from DHR, distilled, and organized to report on the Gender Diversity and Racial Diversity of all of Metro and each division's workforce. The data presented here was the basis developing the placement goals in the previous section on Workforce Analysis.

As you navigate this section, please note the following:

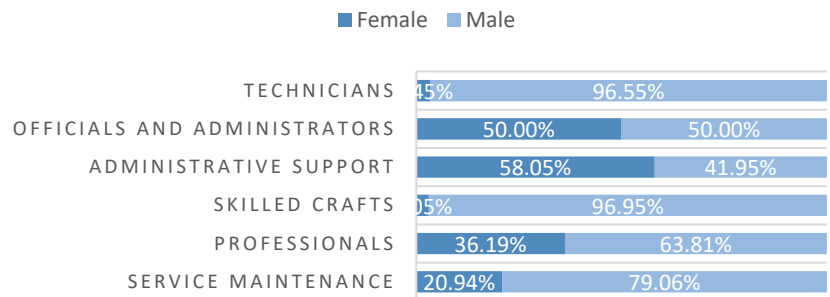
- All data presented is from 2022. This is because the data presented is the data the EEO Offices uses to monitor progress of Metro's EEO Program and four-year placement goals. While more current data is available, comparing those numbers to our four-year goals would lead to confusing and unhelpful results. For more current employment data, please contact our Office.
- As explained on page 10, this report's language is limited in how it describes people and people groups. The data here is limited to a male/female sex designation and does not account for transgender, non-binary or those employees who have an X gender marker.
- In some cases, EEO job categories may be missing from some divisions. This is either because that division does not have employees in that category, or there were fewer than five employees in that category. If a job category was not listed, that did not affect the total numbers and percentages.
- None of the data presented in this section should be construed to mean that there is anything "wrong" or that there is an unwelcoming environment for a group. The data presented is purely informative so that Metro, its divisions, and its workforce can better understand itself as a large and complex transportation agency.

# Workforce Demographics – All Divisions Combined

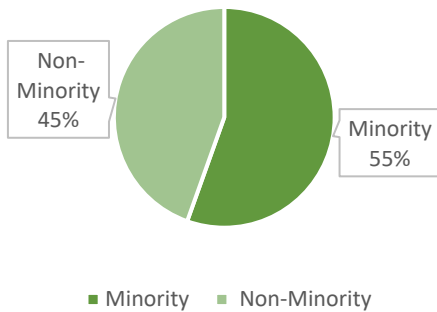
## GENDER DIVERSITY



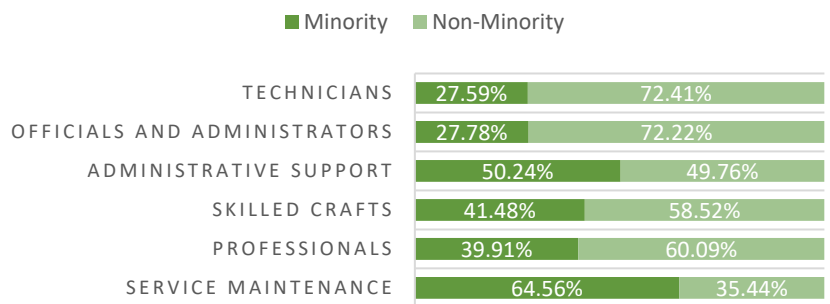
## GENDER DIVERSITY BY JOB CATEGORY



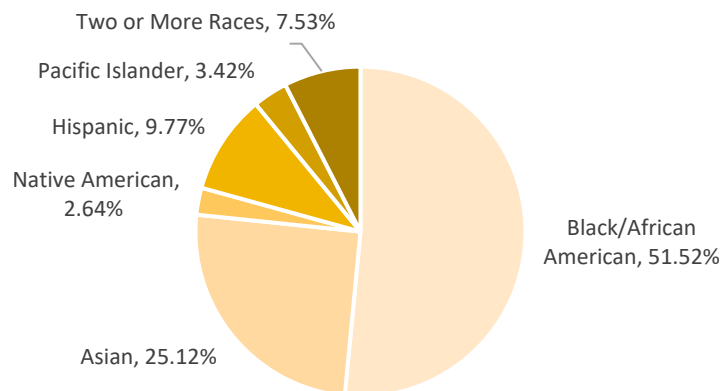
## RACIAL DIVERSITY



## RACIAL DIVERSITY BY JOB CATEGORY

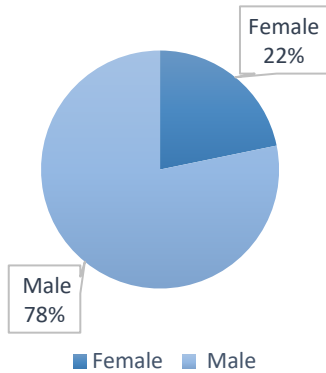


## RACIAL DIVERSITY BY MINORITY GROUP

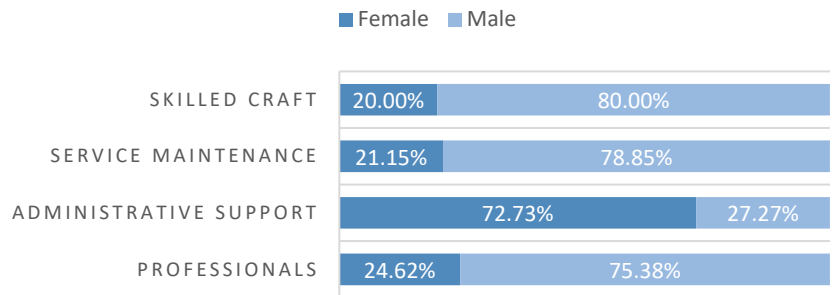


# Workforce Demographics – Bus Operations

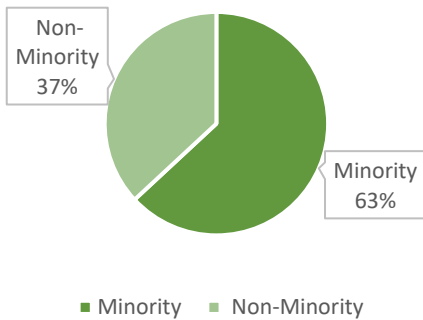
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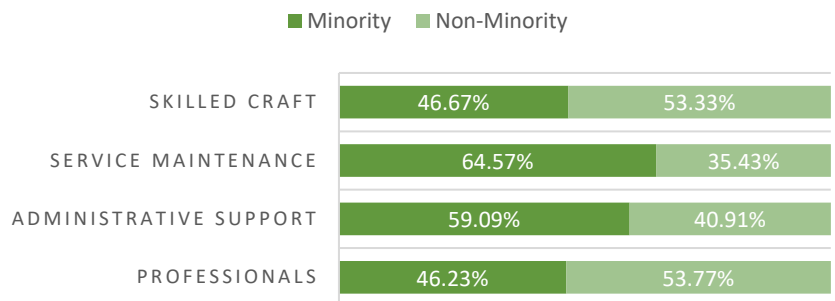
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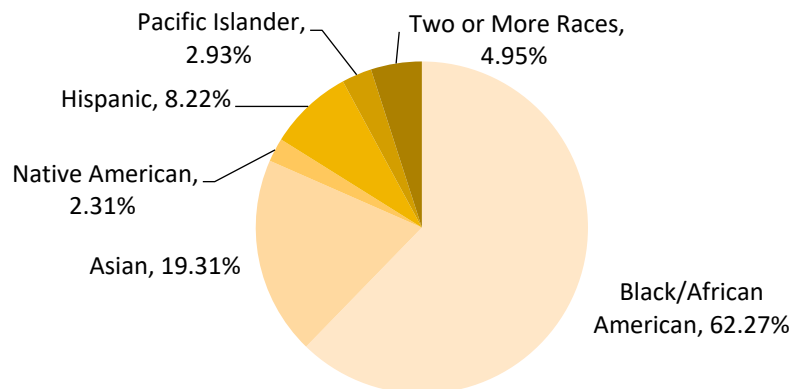
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## RACIAL DIVERSITY BY JOB CATEGORY

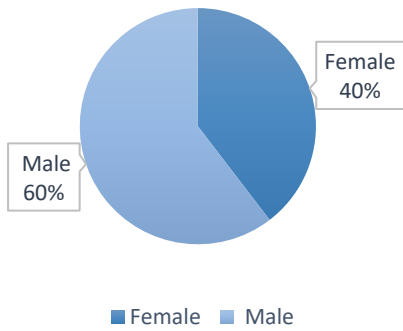


## RACIAL DIVERSITY BY MINORITY GROUP

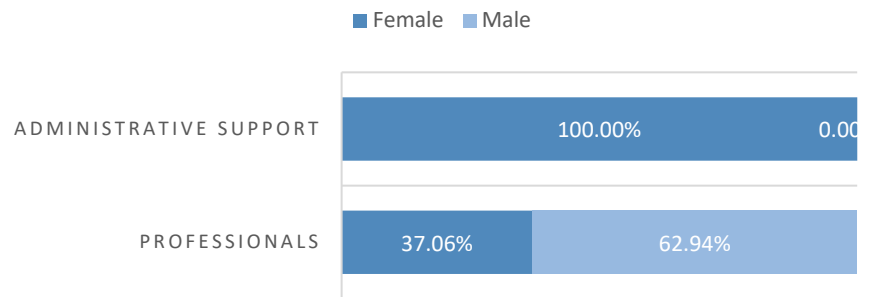


# Workforce Demographics – Capital

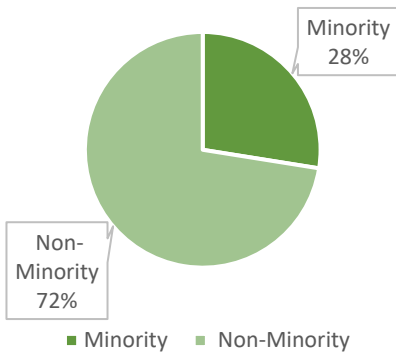
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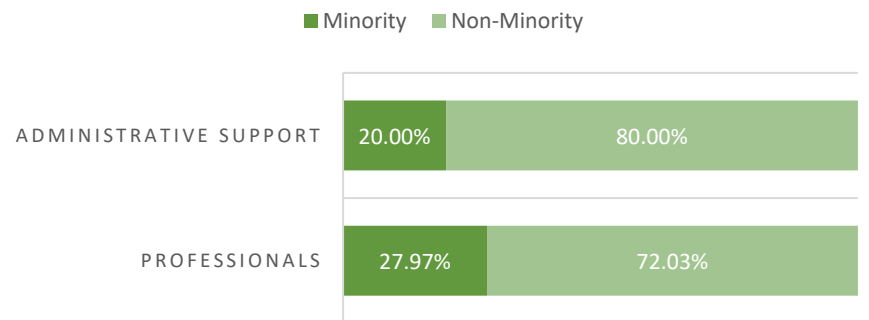
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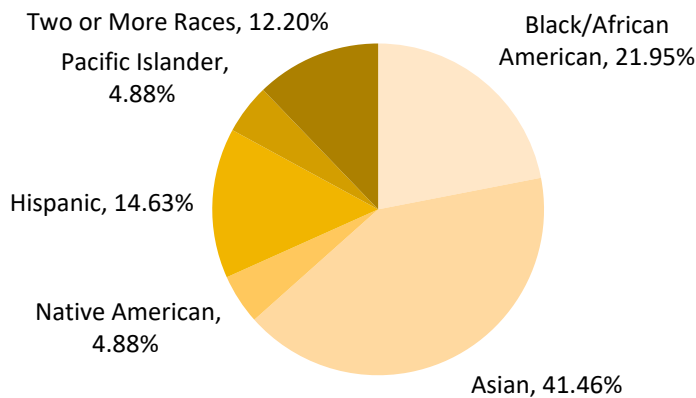
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## RACIAL DIVERSITY BY JOB CATEGORY

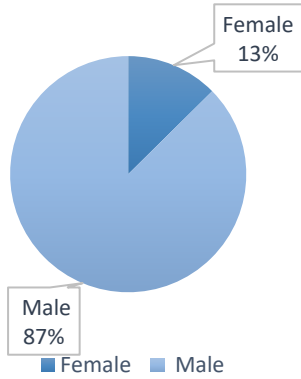


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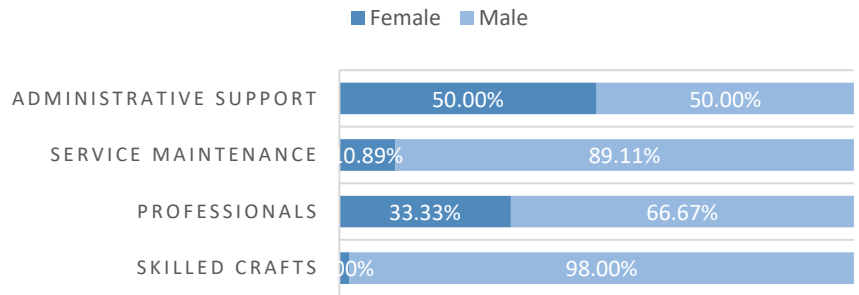


# Workforce Demographics – Facilities

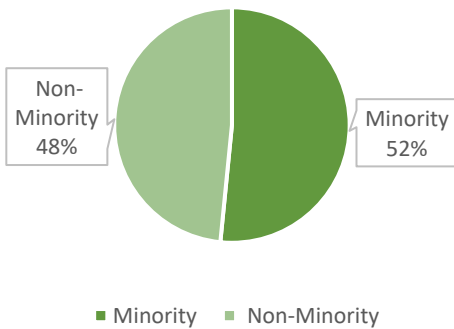
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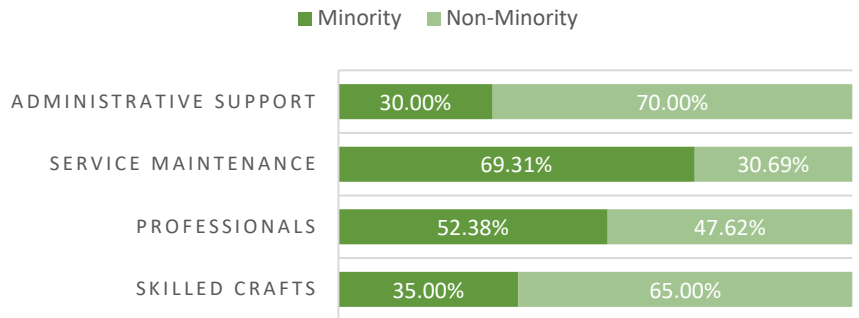
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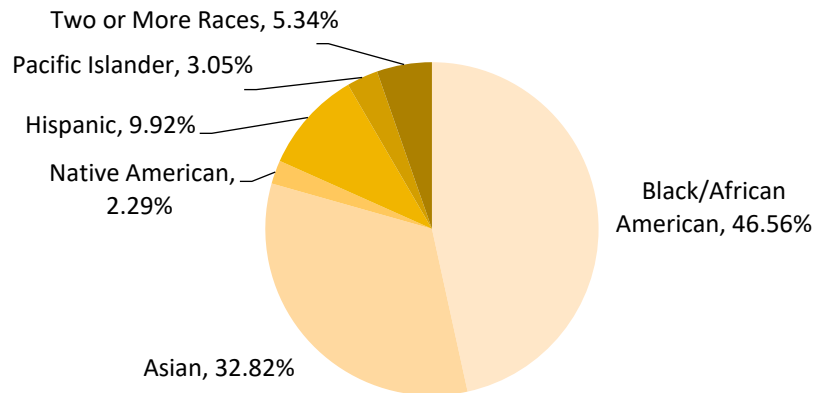
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## RACIAL DIVERSITY BY JOB CATEGORY

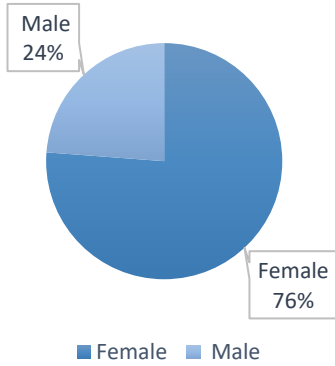


## RACIAL DIVERSITY BY MINORITY GROUP

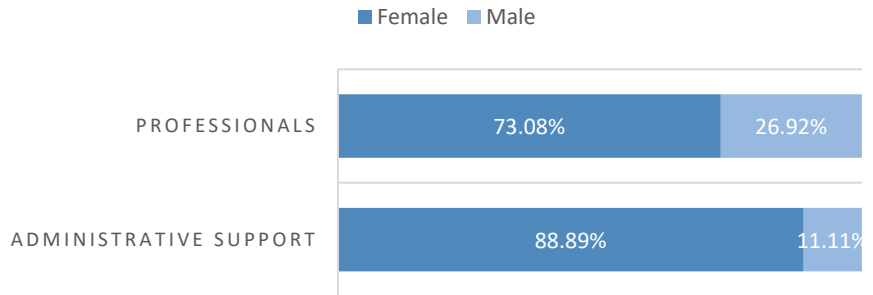


# Workforce Demographics – Employee Services

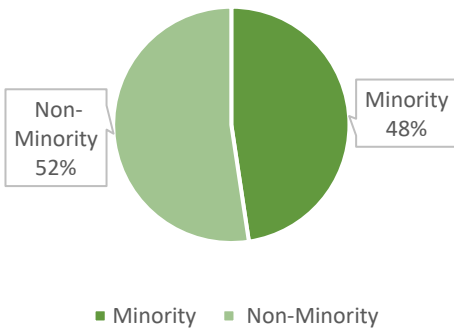
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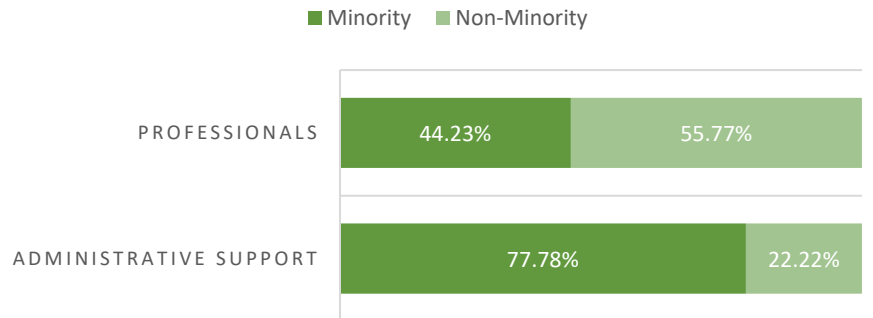
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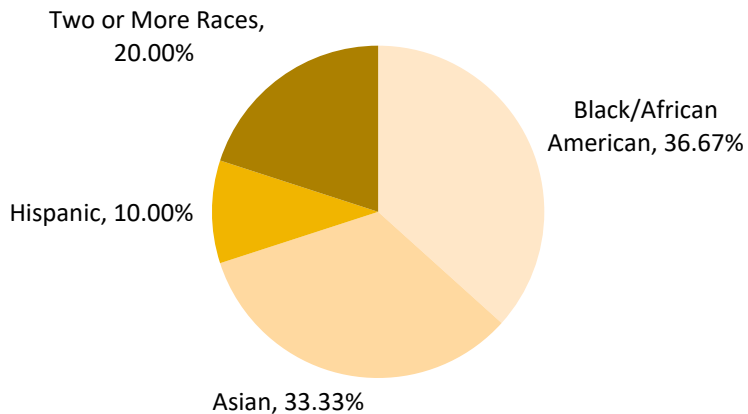
## RACIAL DIVERSITY



## RACIAL DIVERSITY BY JOB CATEGORY

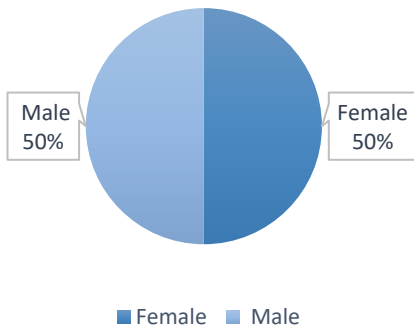


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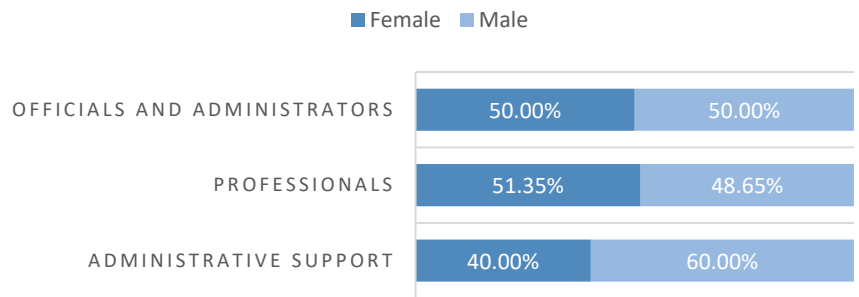


# Workforce Demographics – Finance and Administration

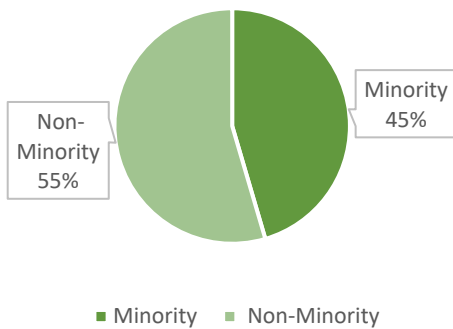
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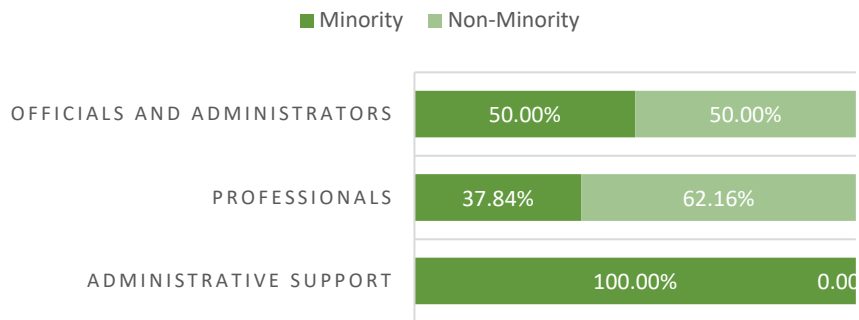
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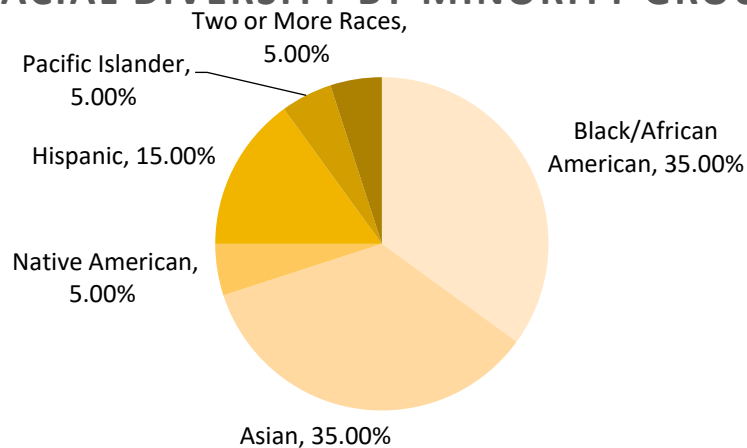
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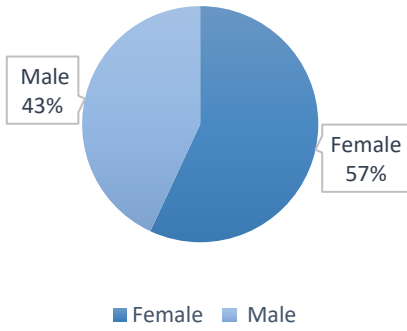


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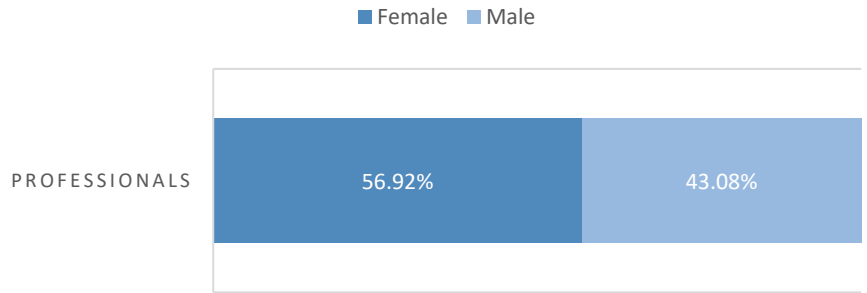


# Workforce Demographics – General Manager

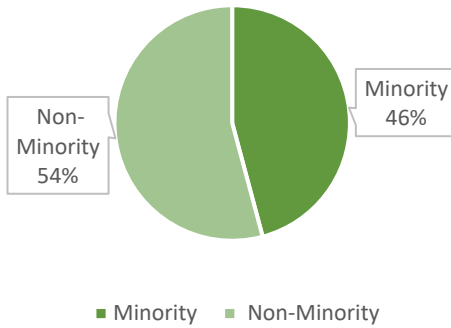
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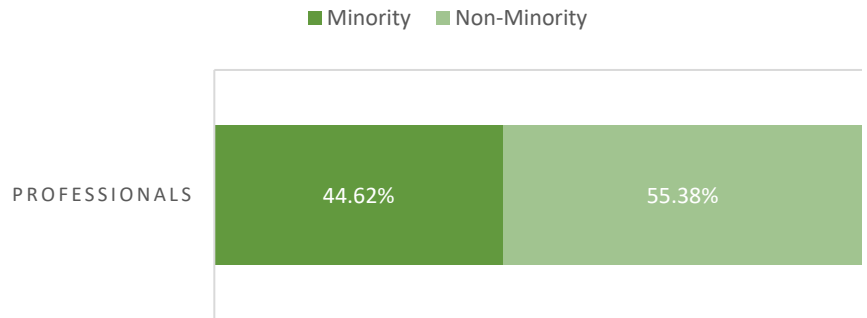
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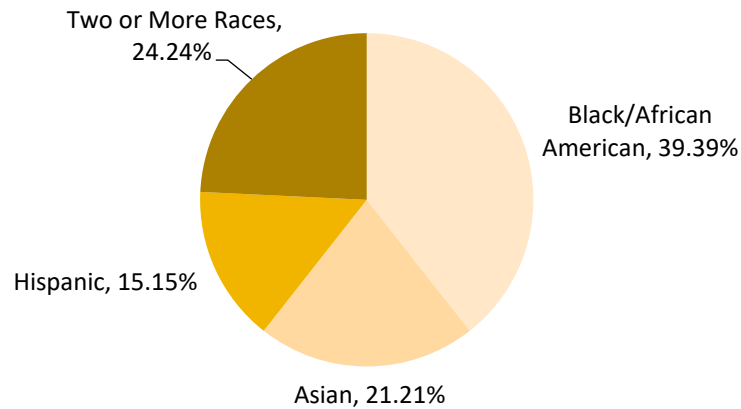
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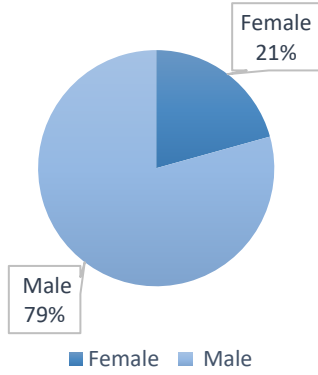


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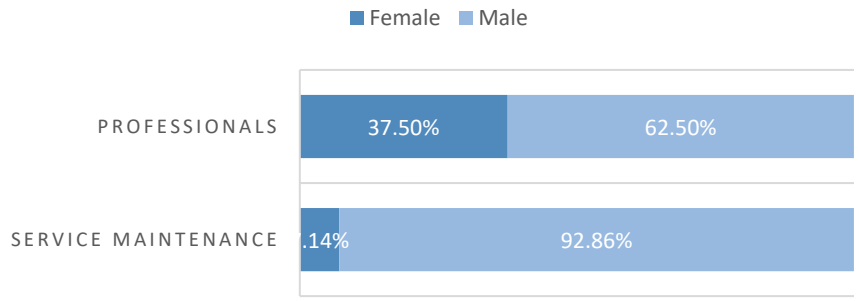


# Workforce Demographics – Marine

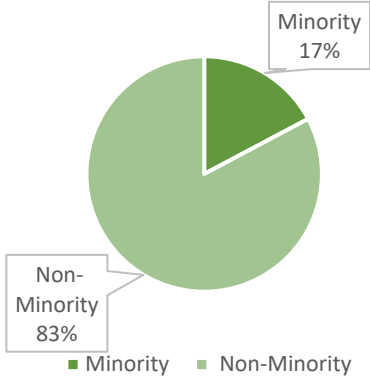
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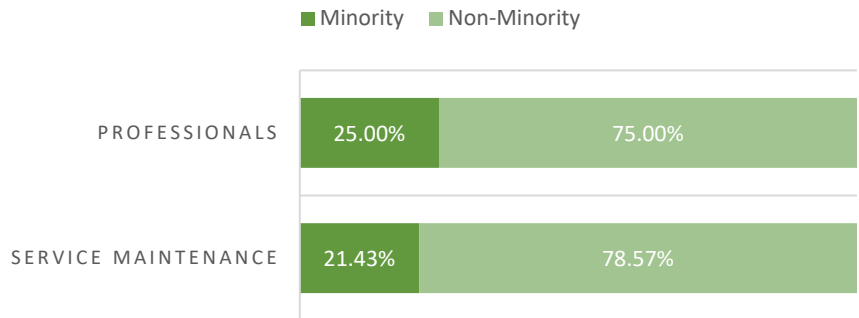
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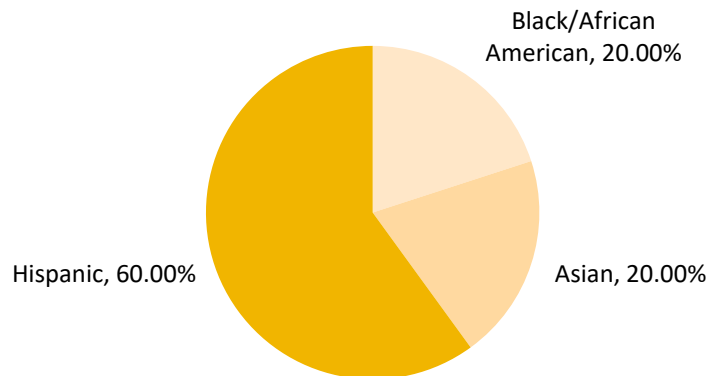
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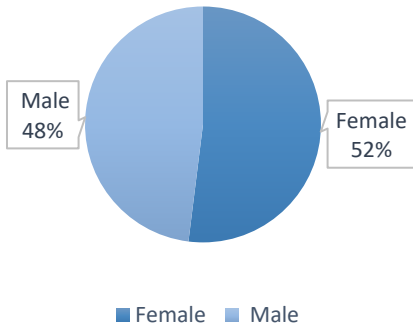


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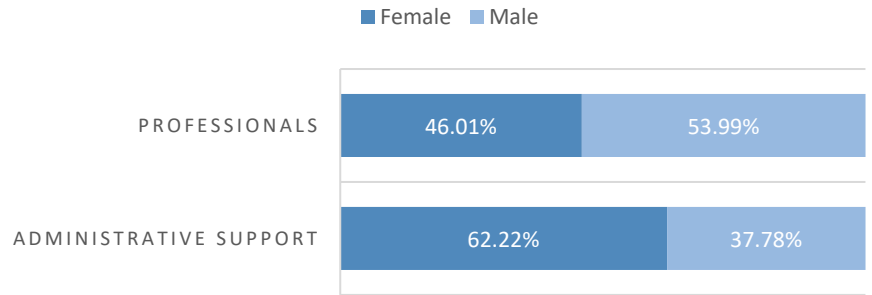


# Workforce Demographics – Mobility

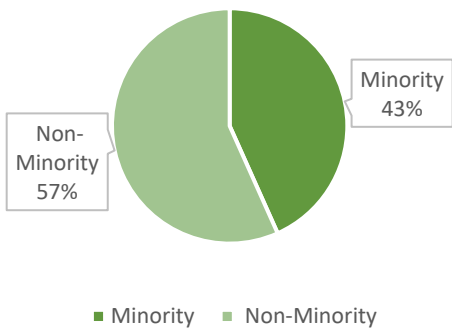
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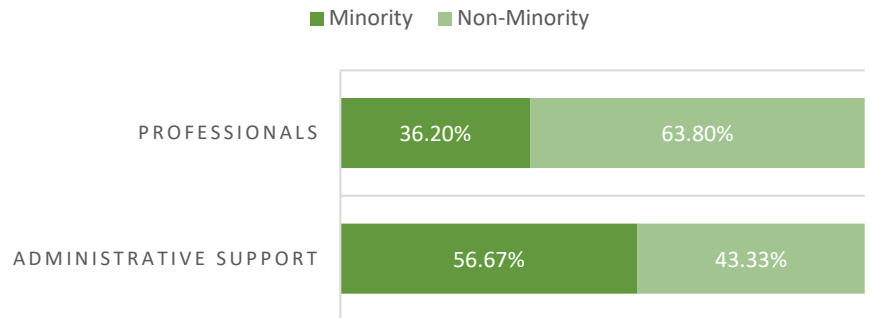
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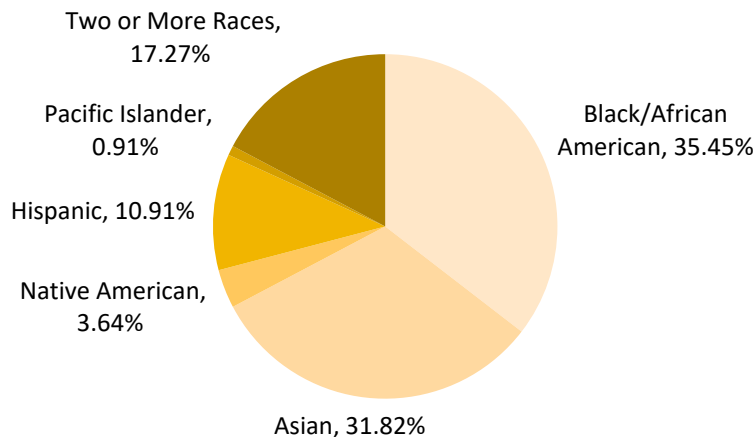
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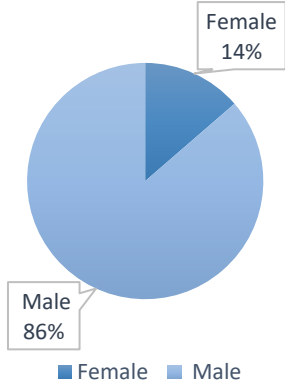


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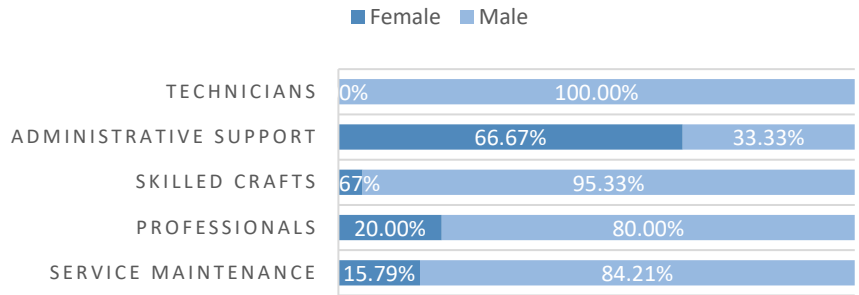


# Workforce Demographics – Rail

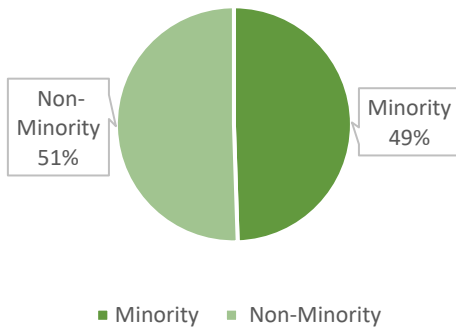
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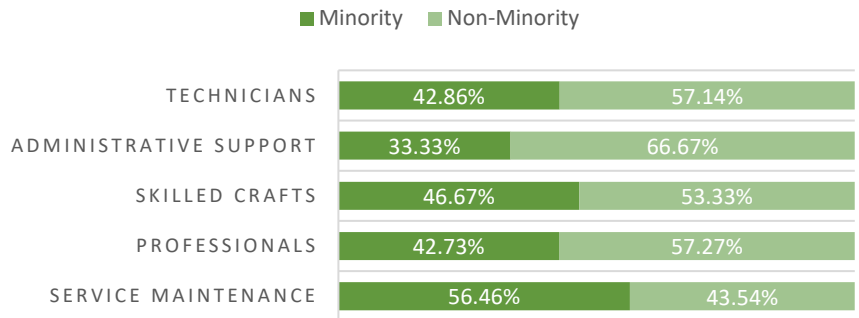
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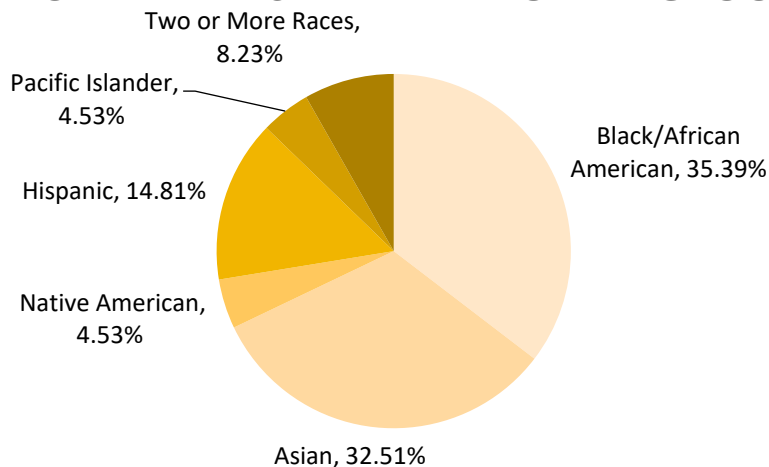
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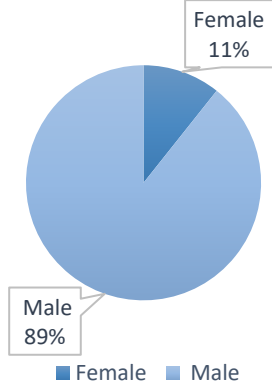


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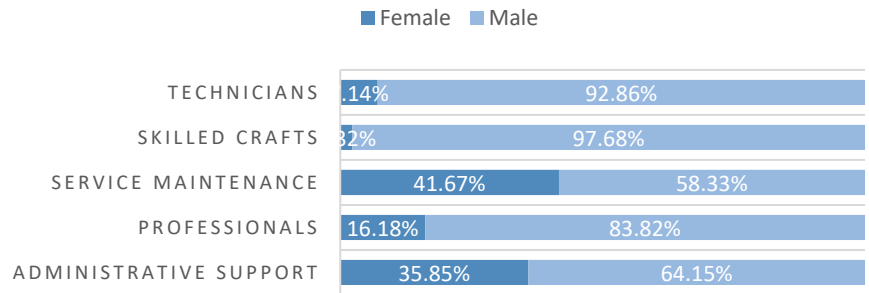


# Workforce Demographics – Vehicle Maintenance

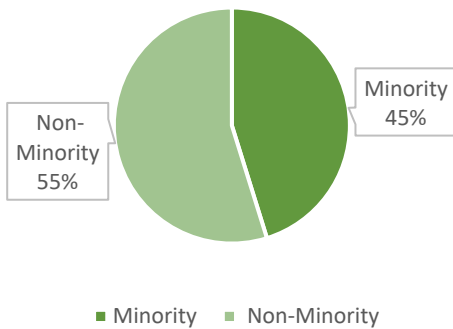
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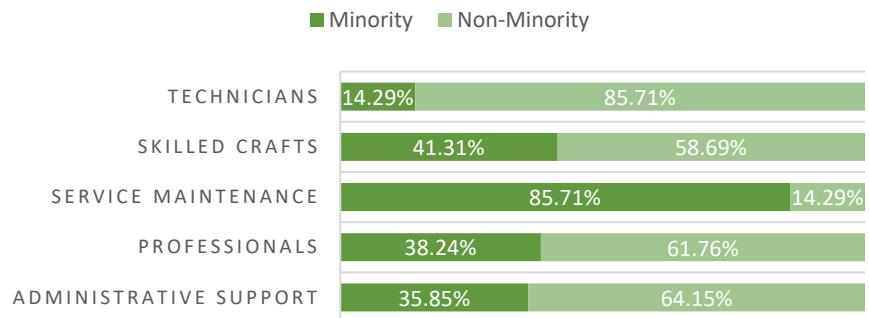
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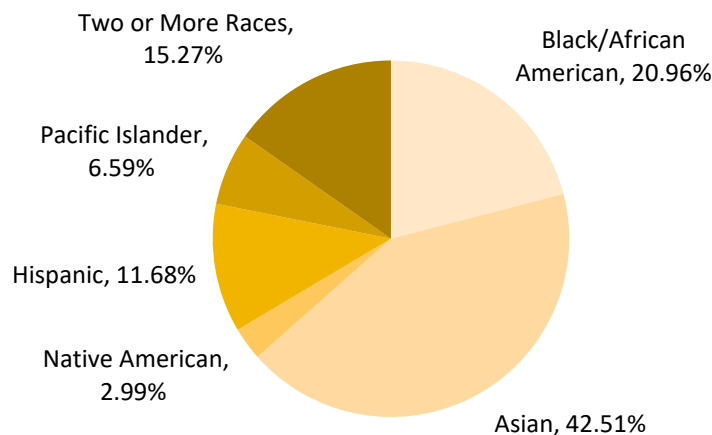
## RACIAL DIVERSITY



## RACIAL DIVERSITY BY JOB CATEGORY



## RACIAL DIVERSITY BY MINORITY GROUP



# How to File a Complaint

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Metro employees and applicants for employment may contact the EEO Office anytime using the information below to file a complaint or ask questions about their rights under EEO law. Information on how to contact the EEO Office, to make a complaint, or report discrimination is also posted throughout Metro, and include Metro’s EEO Policy Statement, and The Way We Work Together posters.

**Metro EEO Office**

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

Employees and applicants for employment may also file complaints of employment discrimination to entities outside of Metro. Filing with another office or agency may affect your ability to file with the EEO Office, so employees are encouraged to speak with an EEO Office to ensure their rights are protected:

- **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](mailto: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>

# Conclusion & Next Steps

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## Next Steps & The Inside Long Game

As stated last year, we practice our Long Game through the virtuous cycle of continuously demonstrating that mobility is human right, investing resources to grow capacity, and measuring outcomes; we now need to look inwards and do the same. This “inside” Long Game invites us to recognize that it is a right for all our employees to have the opportunity to thrive in a workplace free from discrimination, and as we invest in programming and capacity to create those conditions, there must be measurable outcomes that we examine regularly to justify further investment or make adjustment.

Over the next year, Metro will continue to invest in the programs in this Update, evaluate their values based on the measurable outcomes in employment data, receive critical feedback, adjust, and make improvements to our systems.

Next year will be the last Update before a new EEO Program is due to the FTA where our placement goals and employment metrics will be updated. The EEO Office looks forward to continuing to work alongside its partners and the entire Metro workforce in connecting civil rights to equity.



“FIRST FORGET INSPIRATION. HABIT IS MORE DEPENDABLE. HABIT WILL SUSTAIN YOU WHETHER YOU’RE INSPIRED OR NOT. HABIT WILL HELP YOU FINISH AND POLISH YOUR STORIES. INSPIRATION WON’T. HABIT IS PERSISTENCE IN PRACTICE.”

- OCTAVIA BUTLER



## King County Metro Transit (Metro) Equal Employment Opportunity

### Policy Statement

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/or 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.

**Michelle Allison**  
General Manager, King County Metro Transit (Metro)

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](mailto:MetroEEO@kingcounty.gov)  
Phone: 206-477-9454

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.

January 20, 2023

Date

To request this information in your native language, please email [metro.equity@kingcounty.gov](mailto:metro.equity@kingcounty.gov) or call 206-205-8000.

**Spanish** - Para solicitar esta información en Español, sírvase llamar al [metro.equity@kingcounty.gov](mailto:metro.equity@kingcounty.gov) o envíe un mensaje de correo electrónico a 206-205-8000.

**Chinese** - 如果要索取本資訊的中文版, 請致電 [metro.equity@kingcounty.gov](mailto:metro.equity@kingcounty.gov) 或發電郵給 206-205-8000.

**Vietnamese** - Để có các thông tin này bằng tiếng Việt, xin gọi số [metro.equity@kingcounty.gov](mailto:metro.equity@kingcounty.gov) hoặc gửi điện thư đến 206-205-8000.

**Somali** - Si aad u weyddisato inaad ku hesho macluumaadkan Af-Soomaalí, fadlan wac [metro.equity@kingcounty.gov](mailto:metro.equity@kingcounty.gov) ama imayl u dir 206-205-8000.

# Equal Employment Opportunity Office (EEO) Investigation Process

## Process

### START HERE



#### Report is made

A report is submitted online, by phone, mail, in person, or the EEO Office learns of a situation via employees, union reps, directors, managers, superintendents or base chiefs.



#### Case file created

The reported case is logged immediately, assigned a case number, and may be sent to other county partners as appropriate.



**No investigation:** The EEO Office will communicate why and discuss other options.

**Yes investigation:** a formal complaint will be drafted.



#### Intake – Review of Allegations

After receiving a report, the EEO Office will schedule an intake meeting to learn more about the incident.

The EEO office will then determine and communicate whether the case can move forward with a formal investigation following the intake meeting.



#### Formal complaint drafted

The EEO Office will draft a formal complaint that explains the allegations and scope of the investigation.



#### Notices

The EEO Office will notify all parties and the Coordination Team\* that an investigation has begun with a copy of the formal complaint, an explanation of rights, the process, and other important information.



#### Findings report

The EEO Office will draft the Finding Report to be reviewed by the EEO officer with all case information, findings, and conclusion.



#### Investigation

The EEO Office will gather information, interview witnesses, and give all parties an opportunity to provide information and evidence they wish to be considered.



#### Closure & Findings meeting

The EEO Office provides their findings in the Coordination Team\* meeting. The EEO Office will send Notices of Investigative Closure to the parties.



#### Formal Investigation Process complete

The EEO Office's involvement in this process is completed. The investigation outcomes and any additional steps will vary depending on findings.

\*The Coordination Team promotes transparency and accountability. It consists of leadership from EEO, Metro HR, Transit Employee Labor Relations, Metro EIB, and DHR Workforce Equity.

# The Way We Work Together

## Experiencing discrimination, harassment or retaliation?


### Report it.

If you experience or witness inappropriate behavior in the workplace—you have the right to report it to your supervisor, Metro EEO, or Metro Human Resources Manager.

Metro is committed to creating a workplace free from discrimination, inappropriate conduct, harassment, and workplace retaliation for all employees.



I have repeatedly asked not to be hugged, but my requests are ignored. I called EEO to know what my rights are.



I was called names by a co-worker, but when I asked for it to stop, I was told it was “just a joke.” I contacted EEO about what I could do.



I am tired of hearing inappropriate and sexual comments on the shop floor, so I reported it to my supervisor and emailed EEO.

### How to report

<b>Metro EEO Office</b> 206-477-9454 MetroEEO@kingcounty.gov	<b>Metro Human Resources Manager</b> 206-477-6000 MetroHRManager@kingcounty.gov
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Or contact King County’s Department of Human Resources, more information in the link below.



Scan the QR code to learn more or visit:  
[kingcounty.gov/metro/employeeculture](https://kingcounty.gov/metro/employeeculture)





**King County Metro Transit Department**  
**EEO Office**

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

(206) 477-9454 (TTY Relay 711)

[MetroEEO@kingcounty.gov](mailto:MetroEEO@kingcounty.gov)

# Attachment 12: 2025 EEO Program Report Update

King County Metro

# EEO Program Report

2025 Update

Contextualizing the Women's Needs Assessment



King County

**METRO**

*Moving forward together*

March 20, 2025



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

[MetroEEO@kingcounty.gov](mailto:MetroEEO@kingcounty.gov)

(206) 477-9454 (TTY Relay 711)

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# Introduction from Metro's EEO Officer

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Dear Metro community,

Our nation's commitment to civil rights is being tested. Long-standing laws that protect against discrimination, expand access for people with disabilities, and increase opportunities for underserved communities are facing unprecedented challenges in our courts and public discourse.

Let me be clear: Metro does not discriminate based on race, gender, national origin, disability, religion, sexual orientation, gender identity or expression, or veteran status. We comply with all civil rights and anti-discrimination laws, and remain committed to upholding the dignity and civil rights of our employees and riders. Our values will not be shaken by political rhetoric and unconstitutional threats.

Now more than ever, I am honored to present this year's Equal Employment Opportunity (EEO) Program Report Update. This marks the fourth consecutive year of publication, reinforcing Metro's commitment to accountability, transparency, and creating a workplace where everyone can thrive. Reports like this are essential in demonstrating our values and elevating the voices and experiences most affected by discrimination and its ongoing impact.

This report highlights the findings and next steps of the Women's Needs Assessment, a key milestone in a multi-year initiative to advance gender equity—particularly for Metro's operators and public-facing employees.

I am so proud to work alongside some of the County's most dedicated and talented public servants in advancing civil rights and equity. Thank you to everyone who contributed to this report.

If you have questions about this report or suggestions for improvement, please contact me directly or reach out to the EEO Office by emailing [MetroEEO@kingcounty.gov](mailto:MetroEEO@kingcounty.gov) or calling (206) 477-9454.

Sincerely,



Christopher Takashi Bhang (he/him)  
King County Metro Civil Rights & EEO Officer  
[cbhang@kingcounty.gov](mailto:cbhang@kingcounty.gov) | (206) 263-5580

# EEO Office – Mission, Vision, and Values

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## Mission

To protect civil rights and advance equity for all King County Metro employees.

## Vision

A Metro free of discrimination where everyone can professionally grow and thrive, regardless of who they are and the identities they hold. The Metro EEO Office will do its part to keep our region moving by providing Metro employees and leadership trustworthy information and data to drive equitable employment decisions and policies.

## Values

**Equity.** We name and acknowledge that racism, sexism, ableism, transphobia, and xenophobia are real, systemic maladies that are rooted in our nation’s long history and practices of legal segregation, discrimination, and colonization. The knowledge of the past and present effects on the workplace informs our future work.

**Expertise in Civil Rights Law.** We celebrate that civil rights laws are monumental achievements of our society, fought for by countless leaders and martyrs of justice, including our County’s namesake, the Rev. Dr. Martin Luther King, Jr. We honor their memories with sophisticated expertise in the equal and unbiased application of these laws.

**Compassion.** We listen to the voices and stories of those affected by discrimination with empathy and compassion, regardless of the merits of their allegations. And as a neutral party to these matters, we similarly will treat those alleged to have violated policy or law with equal respect and compassion, knowing that investigations can be a difficult process to experience, and never assuming wrongdoing or intent.

**Transparency.** We practice transparency in our processes, knowing that true transparency leads to accountability. We will strive to ensure that the Metro workforce knows about our policies and procedures in investigations, compliance with federal law, and Metro’s EEO Plan. We invite engagement and critique that leads to positive change and innovation.

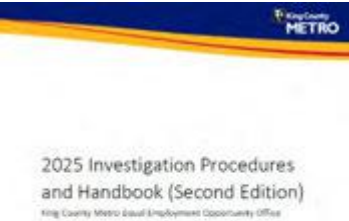
**Cooperation.** We acknowledge that we are part of a larger structure, where partnership with other departments, leadership, and employees is crucial to translating the information and data we provide into meaningful action. While the Office shall operate as independently as possible and free from outside influence, we value the expertise and cooperation of the many talented professionals throughout King County in doing what is just and equitable.

# EEO Office – Processes and Function

The EEO Office continues to grow and refine its approaches to advancing equity and upholding civil rights in the workplace for all Metro employees. This section outlines the office’s function and responsibilities.

If you or your work group have questions or would like an EEO Staff member to present on the office’s role, email [MetroEEO@kingcounty.gov](mailto:MetroEEO@kingcounty.gov).

## Updated Investigations Procedures and Handbook



The EEO Office published its first Handbook in 2023, detailing the standard procedures for receiving, investigating, and analyzing reports of discrimination, harassment, retaliation, and inappropriate conduct. These procedures are designed to build trust in the EEO Office and clarify its role in workplace conflicts. The Handbook was updated for 2025 by EEO Investigator Katie Vail and the EEO Investigation Team.

With these procedures, all reports submitted to the EEO Office are received, addressed, and analyzed in a transparent and consistent manner. Employees should never feel isolated or uninformed after making a report or being part of an investigation. The full Handbook is available for all employees and prospective employees to read [here](#).

## The Reporting and Investigation Process

The EEO Office has developed a step-by-step process map to simplify its investigation procedures. The document includes a Frequently Asked Questions section explaining the office’s role and how investigations are conducted. A copy is included in Appendix B this report and can also be accessed [here](#).

The document outlines each step of the process: receiving reports, conducting an intake process, drafting of complaints, providing notices to parties, conducting the investigations, writing findings, and closing out a case.

If your work group would like a physical copy of this poster, email [MetroEEO@kingcounty.gov](mailto:MetroEEO@kingcounty.gov).



## Coordination Team

The EEO Office continues to convene a Coordination Team that includes leadership from EEO, the Employee Services (ES) Division, Transit Employees Labor Relations (TELRL), Human Resources, Equity, Inclusion, and Belonging (EIB), and division leadership, as appropriate. This team ensures that all EEO-related matters receive a coordinated and appropriate response.

This Coordination Team primarily addresses highly sensitive and confidential matters arising from discrimination allegations or data gathered by the EEO Office. While the team facilitates collaboration before and during an investigation, post-investigation action or remedies are generally not its focus. This structure allows the EEO Office to maintain its independence and conduct impartial investigations.

## What's New for 2025

- **Case Management IT Solution is LIVE.** In the 2023-24 biennial budget, the EEO Office secured \$1.2 million to develop an Information Technology (IT) solution to improve administrative and data management for reported and investigated cases. The system was designed with functionality that could expand across the County enterprise. Beyond employment complaints, the system also supports the Americans with Disabilities Act (ADA) and Title VI of the Civil Rights Act complaints, tracking and logging reasonable accommodations for employee with disabilities, monitoring responses to the Federal Equal Employment Opportunity Commission (EEOC), and potential integration with the Department of Human Resources' (DHR) Workforce Equity investigations.

The EEO Office serves as the project sponsor, with dedicated project management support from Metro's Technology Project Management Group and the King County Department of Information Technology (KCIT). A steering committee—composed of civil rights laws experts, investigations, IT specialists, and senior level leadership from DHR and Metro—guides the project.



After nearly two years of planning and design, a contract was signed in November 2023 to build the system on the Origami Risk platform, the same platform as Metro's SSaM reporting system.

In January 2025, the Case Management System officially launched. It is now being used by Metro's civil rights teams for EEO cases, reasonable accommodations for disabilities, and civil rights-related complaints and public requests, including reasonable modifications. The first-of-its-kind unified system enhances efficiency, transparency, and data-driven decision-making, marking a significant milestone in Metro's civil rights case management.

- **Training and Expanded Presence.** With additional staff and updated procedures, the EEO Office has expanded its in-person training and education at bases and other Metro worksite. These trainings were developed in response to employees' needs to better understand their civil rights, and cover topics such as: filing nondiscrimination complaints, including requesting reasonable accommodations for disabilities, taking protected leave, and changes in federal law that expand protections for pregnant workers. Providing employees with knowledge about their rights aligns with Metro's e gender equity initiatives, detailed later in this report. To request training, contact the EEO Office.
- **The Final Year in this Reporting Cycle.** While Metro updates its EEO Programming annually, its metrics and goals follow a four-year cycle to align with Federal Transit Administration (FTA) requirements. 2025 marks the final year of the current reporting cycle, which began in 2022.

The next report will summarize the previous four years, set new goals and metrics, and provide Metro leadership a clear, data-driven path to ensure a thriving workforce.

## Answering Your Questions

The EEO Office receives many questions about its processes and operations, some of which are not addressed in existing materials. Below are key questions and their answers. If you have additional questions, please contact our office.

- **Q: What happens during an investigation? What is the role of HR and Labor?**

This process depends on your role in an investigation. Complainants and Respondents receive closure notices and may meet with an investigator to discuss the findings. Witnesses typically do not receive updates after an investigation. For privacy reasons, the EEO Office only shares investigative information with individuals who have a legitimate business need to know.

- **Q: Why did the EEO Office publish the VM Report and the Women Needs Assessment but not other reports?**

These reports were published due to their broad impact and historical significance, including a 10-year review of one of Metro’s largest divisions. From the outset, the VM report was intended as a transparent effort to assess working conditions for women, with a commitment to making the findings accessible to all Metro employees. Additionally, these reports did not involve any specific respondents—no individuals were accused of violating EEO law or the Nondiscrimination Policy. The EEO Office does not share investigative findings with individuals, workgroups, or division leaders unless they have a legitimate need to know, ensuring privacy for those involved.

- **Q: Why should I trust the EEO Office when I feel like it has been weaponized against certain individuals or workgroups?**

The EEO Office strongly condemns any misuse of its role as a neutral factfinder. While individuals have the right to file complaints of discrimination or harassment, the EEO Office’s structured intake and investigative procedures ensures a fair, transparent, and predictable process for all parties.

Each claim is thoroughly vetted through a rigorous screening and legal analysis. The EEO Office encourages employees and prospective employees to learn more about its process to share their comments, concerns, and questions.

# Employee Engagement Survey & EEO Survey

## Coming Soon: Employment Engagement Survey

The 2025 King County Employee Engagement Survey will be open from March 31 to April 21, 2025, offering employees an opportunity to share their experiences and insights about working at King County. The survey covers topics such as wellbeing, inclusion, and belonging. Your feedback will help shape workplace improvements, ensuring employees feel valued, supported, and connected to our mission.

**How to participate.** On March 31, all employees will receive an email with a personalized survey link sent to their King County email address. The survey can be completed on a computer, tablet, or smartphone through April 21. Employees without regular computer access can complete the survey at a designated Metro worksite engagement table—more details to come.



### About the survey

- **Length:** 35–45 questions (takes approximately 15–30 minutes to complete).
- **Compensation:** Employees will be paid for the time spent taking the survey and should coordinate with their supervisor to complete it during work hours.
- **Languages:** Available in English, Spanish, Vietnamese, Korean, Mandarin, Simplified Chinese, Somali, Amharic, and Russian.
- **Confidentiality:** All responses are anonymous—demographic information is reported only in aggregate form. Individual responses cannot be traced back to employees. Managers and team leaders will NOT have access to personal survey data.
- **Survey platform:** Conducted through Qualtrics, a trusted leader in experience management software.

Survey results will be shared across King County, and team leaders will use the feedback to develop action plans that enhance workplace engagement and support.

## The Metro EEO Survey

FROM 2021 TO 2023, THE NUMBER OF COMPLETED SURVEYS MORE THAN TRIPLED. METRO WILL RESUME THE SURVEY IN 2025.

Later this year, Metro will conduct its fourth EEO Discrimination, Harassment, and Workplace Retaliation Survey, led by the Systems and Information Management Team in the Employee Services Division. This biennial survey is designed to help Metro improve reporting methods and how we address workplace experiences related to discrimination, harassment, and retaliation. The insights gathered will help the EEO Office

and Metro improve workplace experiences for employees, inform workplace safety efforts, measure progress, and highlights areas for improvement.

Based on past surveys, the EEO Office will monitor trends to measure success and progress, including:

- Decreased fear of retaliation, leading to increased reporting of discrimination
- Increased awareness of how to report discrimination
- Greater confidence that Metro leadership will take action on reports

The EEO Office is grateful to the employees who have shared their feedback and to the volunteers who helped ensure that all Metro employees had the opportunity to participate. This collaborative effort is essential in making Metro a safer, more inclusive workplace.

For more information or questions, email [MetroSIM@kingcounty.gov](mailto:MetroSIM@kingcounty.gov).

# EEO Limitations and Representation in Data

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The EEO Office acknowledges that the language used in this report is limited and does not fully capture the diverse identities, cultures, and lived experiences of Metro employees. Some terms may feel outdated or fail to reflect our evolving understanding of identity and society.

WE CAN AND MUST DO BETTER IN HOW WE TALK ABOUT  
PEOPLE AND CREATE NARRATIVES THROUGH DATA.

However, these terms—such as “females”, “minorities”, and broad racial categories—are required for reporting to the Federal Transit Administration (FTA). Metro’s personnel systems were designed to collect demographic data in alignment with these federal standards.

This doesn’t have to be the standard moving forward. In alignment with recommendations from King County’s [Gender Identity and Sexual Orientation Inclusions Task Force](#), Metro’s Employee Services Division is leading the Modernizing Employment Demographics Project to improve how demographic data is collected and reported. (see page 19 for more details).

Data and reporting are more than numbers or legal compliance—they are about visibility and recognition. When identities are erased or minimized, it can fuel exclusion, discrimination, and harm. Acknowledging and valuing every employee’s identity is critical to fostering an equitable workplace. The EEO Office is committed to improving how we collect and report workforce data and will continue working with our partners to ensure Metro’s data reflects the full diversity of its employees.

# The Women’s Needs Assessment

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This section highlights the key findings and recommendations of the “Metro Transit Frontline & Women in the Trades Needs Assessment: Culture Change for/by Women” (the Needs Assessment). This report represents the **next phase** in creating a more inclusive and welcoming workplace for women working on Metro’s frontlines.

For full transparency, the complete Needs Assessment will be available [here](#) shortly after this report is published. However, this summary provides important context to help employees understand the findings. The EEO Office has not altered the data or recommendations—rather, it presents them alongside what Metro has already done, what is in progress, and where further action is needed.

## History

In 2022, the EEO Office commissioned D Diamond Consulting to examine gender and sex discrimination trends from 2010 to 2021 in the Vehicle Maintenance (VM) Division. The report highlighted underrepresentation of women in the workforce, unfamiliarity with the reporting process for discrimination, and fear of retaliation that discouraged employees from coming forward. These findings underscored a broader need for action across Metro, not just in VM.

THIS WORK REPRESENTS THE **NEXT**  
PHASE IN CREATING A WORKPLACE  
THAT IS WELCOMING AND INCLUSIVE  
TO WOMEN ON OUR FRONTLINES.

In response, Metro Leadership and the EEO Office began developing strategic steps to address these issues including the Needs Assessment, which focuses on identifying and implementing solutions.

## Studying the Solutions

In late 2023, the EEO Office retained the professional services of Aline Baruch Carton-Listfjeld, an organizational development expert with King County’s Career and Culture Division in the Department of Human Resources (DHR), to support to the Women Of Metro Empowerment Network (WOMEN) employee resource group (ERG). Aline is a certified leadership coach and change management practitioner with expertise in fostering healthy and productive workplaces.

The selection process involved months of collaboration with the WOMEN ERG and Metro employees—especially those in public-facing and essential service roles—to define the scope and goals of the project. This process led to the Needs Assessment, with support from several Metro divisions and workgroups, including Organizational Health & Development (OHD), Equity, Inclusion, and Belonging (EIB), and EEO. Key project sponsors included EEO Officer Chris Bhang, Interim Assistant General Manager for Employee Services Kendall LeVan Hodson, and General Manager Michelle Allison. Internal Strategies Project Manager Kate Dabe provided project management support throughout the process.

The Needs Assessment serves as a counterpart to the VM Report. While the VM Report documented the experiences of women in VM, this new assessment shifts the focus to solutions and strategies for improvement. To ensure Metro captured a wide range of perspectives, the assessment expanded beyond VM to include Rail, Facilities, Bus Operations, and Marine Divisions.

From the Assessment’s Project Charter:

In the spirit of supporting all employees and in alignment with the report recommendations, the purpose of this project is to assess the needs of Metro employees who identify as women (including persons who align with or have lived experience with being gendered female, including transgender women, nonbinary, and those assigned female at birth) to help reveal sustainable institutional solutions resulting in measurably improved workplace experiences for all women at Metro. Examples of needs may include, but are not limited to, training, professional development, skill building, career advancement, ERGs, and other positive workplace community networks of support. It will intentionally focus on women of color in public-facing and essential service positions and women in the trades, with the theory that when these women feel supported by our workplace systems and culture, then all women at Metro will benefit.

The Needs Assessment concluded in late summer 2024. The results and findings were completed in October 2024 and were reviewed by County partners in the Human Resources, the Office of Equity, Racial & Social Justice, and the Prosecuting Attorney’s Office.

## Methodology & Approach

The Needs Assessment presents key findings from a learning process conducted between April to October 2024, focusing on the experiences of employees in five operations-based Metro: (1) Vehicle Maintenance; (2) Rail; (3) Facilities; (4) Bus Operations; and (5) Marine. The findings were gathered through various methods, including an anonymous online survey, “brave space” listening sessions and focus groups, engagement with division-based affinity groups, and individual interviews.

A summary of the survey is available on page 15 of the Needs Assessment and is summarized here:

“For this assessment, women-identifying and gender expansive people were identified as survey respondents. They were also offered more inclusive responses to describe their gender identity than are currently offered to employees generally.

- Most respondents (93%) were women or gender 16 expansive people (N=169).
- The survey had a lower proportion of Bus Operations employees (36%) compared to their proportion among operational division employees generally (57.8%).
- Supervisors comprise 38% of survey respondents but only 5% of operational division employees.
- There were fewer respondents proportionally than are represented in operational division employees who identify as Hispanic/Latino (3% vs. 6.06%), Asian (12% vs. 14.53%), and Black (24% vs. 32.78%).
- Conversely, there were higher representations of the “Unknown/Prefer not to say” (12% vs. 4.04%) and “Two or more races” (9% vs. 4.39%) groups.”

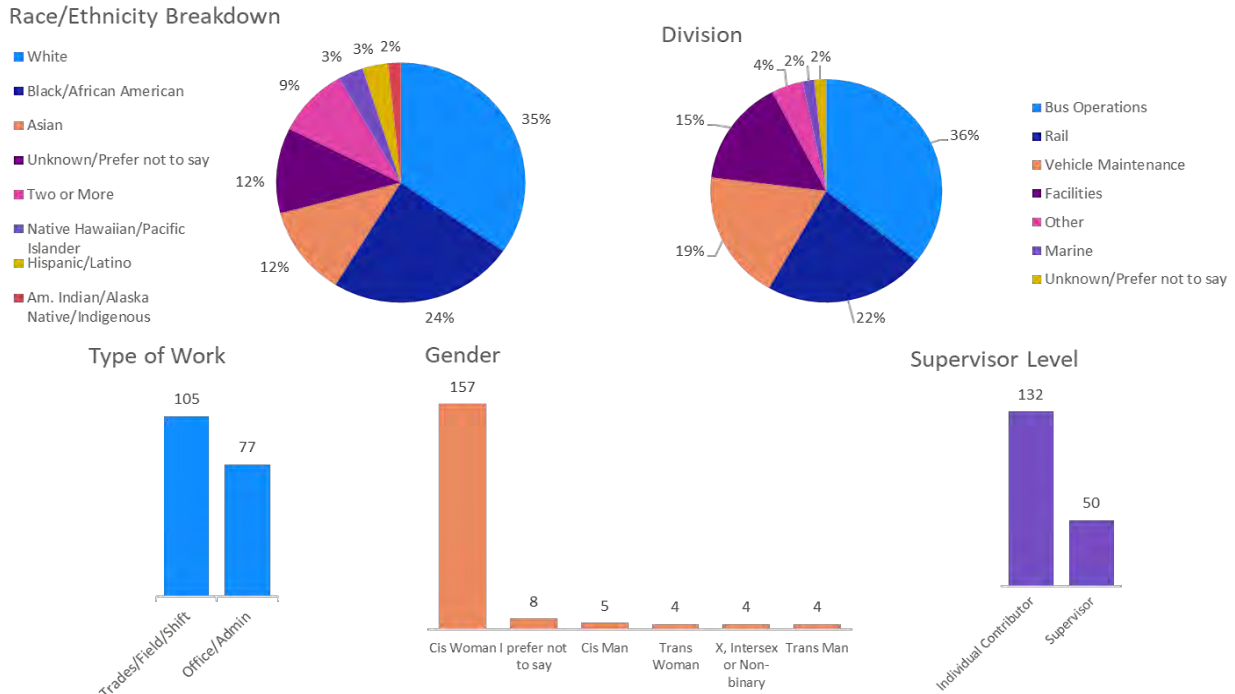


Figure 4. Demographics of Survey Respondents, N=182

## Findings: Areas of Opportunity

Participants in the Needs Assessment ranked their top 10 needs. A full breakdown of responses is available starting on page 18 of the Needs Assessment. While responses varied based on participants' race/ethnicity, gender identity, and division, several common themes and important trends emerged.

### Top 5 needs:

1. More training and support to succeed in their current job
  2. More safety and security at their worksite
  3. More consequences and accountability when employees behave badly or break work rules
  4. Access to promotional and career advancement opportunities
  5. Direct supervisors to encourage and support career goals
- Needing **more time to review Metro communications** and **affordable childcare** at worksites ranked lowest overall, except among Asian women, who ranked childcare as sixth-highest need.
  - The greatest variation by race/ethnicity was in need for **more consequences and accountability for bad behavior**. White women ranked this as their top priority, with Asian women ranked it ninth, and Black women ranked it seventh.
  - Gender-expansive employees placed a higher priority on **opportunities such as Employee Resource Groups**, ranking them third, compared to cisgender women who ranked them eighth.

- Women ranked needing **more safety and security** when traveling to and from work as a higher priority than non-women respondents.
- Night shift workers frequently reported feeling **unsafe, fearful**, and experiencing threats or assaults. They also cited poor air quality, exposure to used drug paraphernalia, and encounters with bodily excrement as common workplace issues.
- Across all divisions, respondents noted a **high level of trust in their supervisor** and often turned to them for help. Women in Bus Operations ranked union representation as a higher priority (third) than women in other divisions. Women in Facilities reported greater trust in the EEO Office compared to other divisions, although the EEO Office ranked sixth out of nine overall.
- Many respondents expressed a **lack of support regarding bullying, retaliation, and intimidation** under current policies. They reported that offensive remarks, including micro- and macro-aggressions, are widespread and often ignored, leading women employees to rely on unhealthy coping strategies to just get through their workdays.
- Respondents who had previously filed complaints with the EEO Office appreciated the office’s prompt responsiveness. However, many expressed **frustrations with the length of investigations and the lack of follow-up** or other communication from supervisors, HR, and division leadership after an EEO finding—regardless of the outcome.

Based on the themes that emerged during the learning process and survey—including qualitative data and findings—the Needs Assessment identified the following five **High-Priority Areas of Opportunity**. More details on each Area of Opportunity can be found starting on page 22 of the full Needs Assessment.



## Desired Future State Summary of Proposed Solutions

This section addresses the proposed solutions as organized by the five Areas of Opportunity. For each Area of Opportunity, the proposed solutions are outlined, along with contextual information regarding the status of each proposal. A full list of proposals can be found in Appendix D. Each proposal is labeled with one of the following statuses:

- **Complete:** Metro has completed this proposal, and no future action is required.
- **Complete – Existing Policies and Structures in Place:** Metro has largely completed this proposal and already has established policies and structures available throughout Metro. The proposals demonstrate support for the continued growth and bolstering of existing programming in alignment with the recommendations. It may also indicate a need for Metro to better socialize and educate employees on these existing resources.
- **Complete – Implementing:** Metro has completed the groundwork for this proposal and has begun rolling it out, but it is still in either a piloting phase or has not yet fully reached the intended population.
- **In Progress:** Metro is aware of the need and is actively working to study and/or implement the proposal.
- **Not Started – Requires Additional Research:** Metro recognizes the importance of the proposal but needs additional research to understand the problem, potential solutions, required resourcing, and strategies for implementation.
- **Not Started – Requests Additional Partnership:** Metro acknowledges the importance of the proposal but requires additional partnership with another County agency or labor union to ensure compliance with County Policies and Union Agreements. Acting independently could violate labor practices.

Because training and support in one’s current role emerged as a key theme throughout the report, we highlight the following responses to some of the proposals:

**Support & Training in Current Job: Assessing Training Content & Delivery**

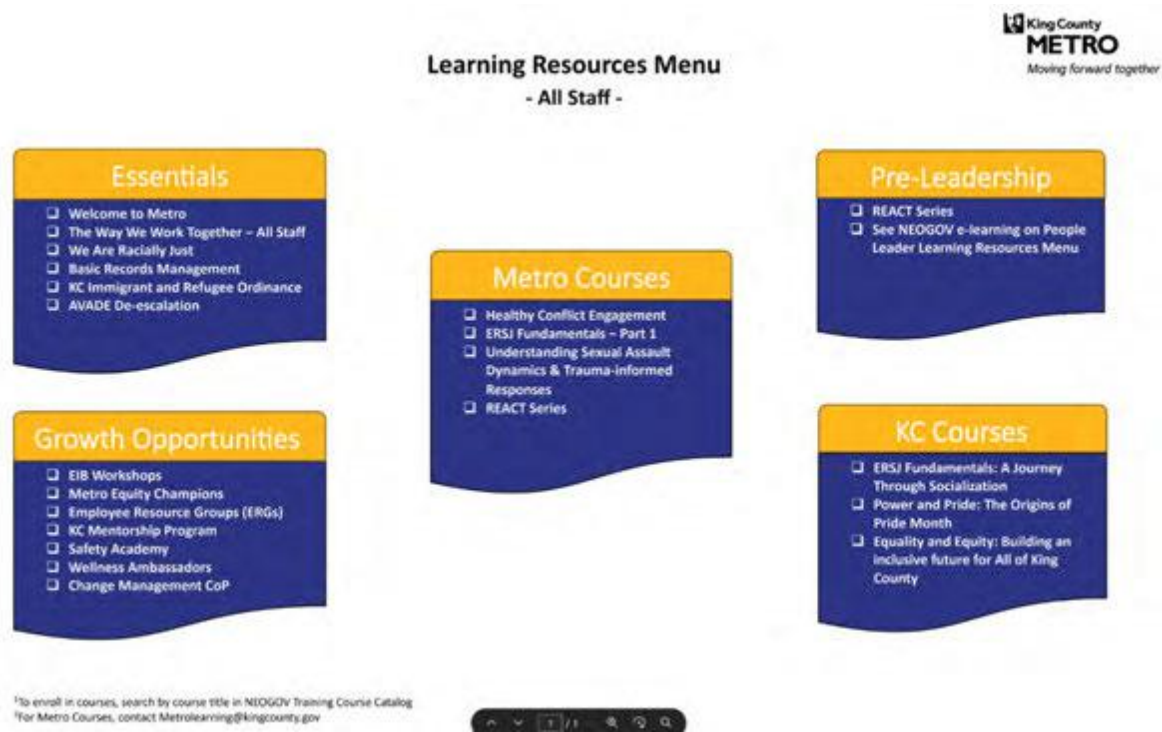
The Needs Assessment proposes the following regarding the assessment of training and content and delivery:

- *“Conduct comprehensive division-based re-evaluations of content and delivery of skills-based tests and trainings, include perspectives of frontline and tradespeople. The evaluation should cover:*
  - *Onboarding*
  - *Job specific skills development*
  - *Safety & Wellbeing*
  - *EEO compliance, equity and belonging*
  - *Performance management*
  - *Conflict management*
  - *Professional development & career advancement*
- *Increase standardized, built-in, predictable, transparent skills-based training time to ensure reasonable access for all employees.*
- *Increase standardized, hands-on, on-the-job training that is transparently tracked to ensure equal access for all employees.*

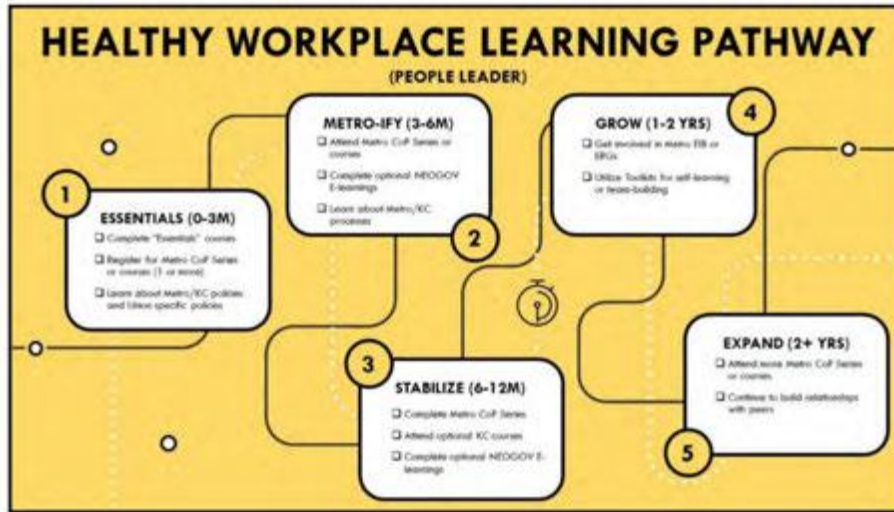
- *Develop and implement a transparent and standard onboarding and annual training checklist by classification/job type, which supervisors can use with their direct reports to track progress towards training goals.*
- *Standardize EEO, sexual harassment, and other equity-related trainings into the onboarding process.”*

Organizational Health and Development (OHD) has a list of mandatory County and Metro training sessions for new hires. This includes *The Way We Work Together (TWWWT)*, which covers King County’s nondiscrimination and anti-harassment policies. The training teaches employees how to identify and interrupt bias, discriminatory behavior, and provides information on how and where to report policy violations. It is available in multiple formats to meet operational needs. To date, 2,146 supervisors and non-supervisors have completed training.

OHD also offers additional voluntary training opportunities, such as Healthy Conflict Mindset; Equity, Racial and Social Justice Fundamentals; REACT Series; Leadership Academy; and Supervisor Mechanics. Furthermore, OHD provides a learning pathway for supervisors and non-supervisors to foster a healthy workplace culture. The learning pathway includes recommended courses and toolkits to help supervisors and non-supervisors enhance their interpersonal skills and promote equity in the workplace. These resources are available to all Metro divisions via the Metro Toolbox site on SharePoint. Divisions can also request consultation support from OHD to tailor these plans to specific work groups and job requirements (see screenshots below).



Example pathway for people leaders using Metro/KC Learning Resources



OHD is collaborating with the EEO office to design and develop EEO-specific content for onboarding and on-demand training.

The King County Office of Alternative Dispute Resolution (ADR) provides early resolution of workplace conflicts through various dispute resolution processes. ADR offers a fast, cost-effective way to:

- Resolve problems early between individuals and within work groups
- Develop conflict resolution skills within your organization
- Facilitate cooperation between unions and management
- Mediate grievances
- Avoid litigation

ADR services are coordinated by a trained mediator who matches the requestors with volunteer mediators. The service is voluntary and confidential.

Metro's registered Apprenticeship Programs address critical workforce needs by supporting structured knowledge transfer and developing Metro's frontline workforce. These programs also serve as a tool in increase diverse representation in trades and creates pathways for individuals historically excluded from becoming skilled mechanics. Apprentices gain valuable technical skills along with training in technology, communications, conflict management, and leadership. The hands-on, on-the-job training follows a structured outline of key work processes and is overseen by management, labor-management committees, and Apprenticeship Program Managers. Metro's apprenticeships are registered with the State of Washington, ensuring apprentices receive a state-recognized credential and a job at Metro upon completion. These programs provide paid on-the-job training and education at no cost. Graduation earns a journey-level position, a career at Metro, and college credit.

**Response: Support & Training in Current Job - Supervision Best Practices**

The Needs Assessment recommends the following improvements to supervision best practices:

- **Onboarding Checklists:** Develop standardized onboarding checklists tailored to specific job roles. Review and update checklists annually in coordination with section and/or division leadership.
- **360 Assessment for People Managers:** Integrate 360-degree assessments into professional development for people managers.
- **Empathy & Respect:** Develop leadership resources to help managers enforce union contract language and policies while demonstrating empathy, respect, and a growth mindset.
  - Assign a designated liaison within each division to oversee, evaluate, and improve supervision best practices, training, and coordination of Learning and Developments efforts with EIB and OHD.
  - Incorporate required people-skills trainings for managers to shift from punitive approaches to coaching-based leadership, emphasizing active listening and support. Define supervisors’ responsibilities in helping employees succeed and grow in their careers.
- **Regular Check-ins:** Implement structured, regularly scheduled check-ins between supervisors and direct reports, using a standardized template to cover key topics such as job satisfaction and professional development.

Currently, 360-degree assessments are not a standard resource for all employees, as they are not part of King County’s performance appraisal process and require collective bargaining. However, limited internal resources are available for 360 assessments when paired with professional coaching. People leaders may also voluntarily engage external consultants for coaching and 360 reviews as part of their professional development. The Metro Toolbox provides a curated list of external coaches, and OHD offers consultation on the process as needed. The Metro Leadership Team encourages their managers to engage in professional coaching.

OHD provides a range of leadership training programs, including: Leadership Academy, REACT Series, Trauma-informed Supervision, and Building Gender Equitable and Inclusive Spaces for Supervisors. These courses incorporate a growth mindset and teach supervisors to lead with an empathy-centered, people-first approach while maintaining high-performance standards. Additionally, King County offers the Leading the Way Series which includes: Leading for Wellbeing, Equity and Leadership, Building High-Trust Cultures, and Leader Learning Labs. These resources equip supervisors with practical tools to foster a healthy workplace culture and improve their leadership effectiveness during team check-ins.

For details on onboarding-related responses, see page 22 of this report.

## Next Steps and Recommendations

The Assessment provided several recommended next steps, including a proposal for the EEO Office to draft this section of the update as an addendum, contextualizing the findings and outlining current and future initiatives. It also recommended sharing this report widely with impacted and interested stakeholders. The EEO Office has already scheduled multiple meetings with affected groups and will continue to disseminate findings and provide education to workgroups throughout 2025.

Additionally, the Assessment emphasized the need for sustainable work planning and strategies to ensure continued progress. Metro Leadership—including the General Manager, Assistant General Manager, Chief of Staff, Chief Administrative Office, EEO Officer, and EIB Manager—is actively meeting

to advance work planning and organize strategic proposals. Outcomes from these discussions will be shared in a future Metro communication.

## Gratitude and Acknowledgements

The Needs Assessment was made possible through the collaboration of many Metro teams, employees, and community members. We extend our deepest appreciation to:

- Women of Metro Empowerment Network (WOMEN)—for their leadership in initiating the deployment of this assessment.
- Guidance & Action Team members—for their invaluable strategic insights, interdisciplinary guidance, and outreach efforts.
- EEO Office leadership and staff—for their steadfast support in advancing this work.
- Enterprise Employee Services leadership and staff—for their active engagement in administrative coordination, relationship-building, outreach and research.
- EIB Managers and other ESJ and Wellness program managers—for their data contributions and early-stage insights.
- HR Business Partners—for sharing division-based HR strategic insights.
- Transit Employee Labor Relations staff—for their expertise in data collection and tracking systems.
- Assistant General Manager of Partnerships and Strategies—for their who timely feedback that helped pivot propel this work forward.
- Division leaders—for partnering with us to reduce barriers and implement best practices to engage prospective participants.
- Bus Operations’ Speak Listen Communicate (SLC) Committee and Ambassadors—for deploying peer ambassadors to encourage participation.
- People leaders—for their teams participation and removing barriers to engagement.
- Bus Operations’ internal communications team—for their behind-the-scenes scheduling, messaging, and coordinating of listening sessions.
- ATU 587 leadership—for affirming their support early in this process.
- OD Practitioner and OD/ADR Manager—for facilitating listening sessions with bus operators.
- King County Black Women’s Experience Project leaders—for providing valuable alignment insights.
- We also extend our gratitude to the leaders, facilitators, and participants of the following employee affinity groups, who so generously created space for us to connect and engage:
  - o Metro's Transgender, Non-binary and Gender Expansive Advisory Panel
  - o Building Up: Community of Practice for Metro Women Leaders
  - o Rail Division’s Women in Rail group
  - o Facilities Division’s Women RISE group
  - o Vehicle Maintenance Division’s Community Connections

**Most importantly, we thank all the employees who bravely shared their experiences, participated in this effort, and placed their trust in the process. Your voices and contributions are invaluable in driving concrete, measurable improvements towards greater access, equity, and gender justice at Metro.**

# Updates on Continuing Work

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## Building a Gender-Equitable and Inclusive Workplace: Supervisor Training

In 2024, OHD delivered the Building a Gender Equitable and Inclusive Workplace: Supervisor Training to 112 chiefs, superintendents, division directors, and managers across Metro divisions.

This training equips leaders with the skills to recognize and address gender bias and sexism, understand their role in fostering equitable workplaces, and set clear expectations for gender inclusion. Participants gained deeper insights into gender identity and practical strategies for creating inclusive teams.

Key topics included:

- Leader expectations under King County's *Gender Identity in the Workplace Policy* and Metro's values of respect, equity, safety, and accountability.
- Identifying and addressing gender bias, sexism, homophobia, biphobia, transphobia, and the intersections with racism and other forms of oppression.
- Creating inclusive workplaces for women, transgender, and nonbinary employees.
- Providing effective feedback and coaching on workplace behavior expectations.
- Embedding equity in daily leadership practices.

## Modernizing Employment Demographics Project

The Modernizing Employee Demographics Project, finalized in Q2/Q3 2024, established a framework to ensure employees can:

- 1) Express their gender and name accurately in Metro's systems.
- 2) Have their gender identity recognized and reported appropriately.

Despite King County's Gender Identity in the Workplace Policy, Metro employees face barriers in ensuring their gender identity and name consistently are accurately reflected. These challenges—particularly during the onboarding process, employee transitions, and benefits enrollment—disproportionately affect transgender and nonbinary employees.

For example, King County's forms and data systems only recognize binary gender markers (male/female), excluding employees with a legal X gender marker.

Employees also lack clarity on how gender markers are tracked and updated, when they must use their legal name versus preferred name, and how different Metro systems handle this information. Additionally, third-party vendors may track and update gender information inconsistently across different databases.

The project identified gaps, duplications, and areas for improvement in Metro's processes. The final report outline recommendations to enhance employee experiences and provide greater autonomy over identity-related data.

From the recommendations report, four immediate priorities were identified for 2024-2025:

1. Enable pronoun display in Microsoft 365 and Peoplesoft.

2. Improve ID badge creation, so employees can use a preferred name aligned with gender identity.
3. Address issues related to gender markers and health benefits to prevent harm.
4. Standardize gender marker options across employment applications, onboarding forms, and employee data systems.

King County added the pronoun display functionality in 2024. The badge process improvements are in progress, led by the ID & Access Control Office within the Facilities Management Division of the Department of Executive Services.

The third and fourth priorities—health benefits reform and standardizing gender mark options—are more complex. Metro leadership, particularly the EEO Office, is actively advocating for these changes.

In Q3/Q4 2024, key stakeholders reviewed the recommendations report and endorsed these priorities, including:

- Metro’s Trans & Non-Binary Advisory Panel
- Metro’s Employee Services Leadership Team
- Metro’s Chief Administrative Officer, David Eldred
- Metro’s EEO Officer, Chris Bhang
- King County Department of Human Resources Policy Team

Additionally, the King County LGBTQIA+ Employee Resource Group has formally endorsed the priorities and is preparing a letter of support.

Further priorities and next steps will be identified from the recommendations report to guide ongoing improvements beyond 2025.

## Addressing Gender Equity

Metro’s gender equity efforts are rooted in King County’s *True North* values, anti-discrimination and anti-harassment policies, and Metro’s commitment to workplace equity, safety, and culture. This work addresses gender bias and disparities in a historically male-dominated industry, focusing on both leadership and the broader workforce.

The initiative aims to close race and gender equity gaps affecting BIPOC women, transgender, nonbinary, and AFAB individuals in hiring, promotion, and retention; identify and eliminate systemic bias in business practices that reinforce gender and racial bias inequities; and build accountability measures that promote emotionally, physically, and psychologically safe workspaces.

This work is a key part of Metro’s broader commitment to fostering respect, safety, and accountability while creating more inclusive, compassionate, and welcoming organization—both internally for employees and externally for the communities Metro serves. As Metro continues its cultural shift, this initiative will shape long-term strategies that advance equity, inclusion, and belonging across the department.

## Communities of Practice: Undoing Gender Bias

The Community of Practice (CoP) pilot was launched to challenge gender bias among male leaders and foster meaningful allyship. Using an intersectional approach, the program recognized the diverse experiences of women, trans women, trans men, and non-binary individuals across race, ethnicity, age, and ability.

Launched in January 2023 with 14 male leaders at Metro (7 regularly attended), the program expanded in May 2024 with 18 participants and ran through November 2024. Over 12 months, it included 10 sessions, engaging leaders across Metro.

The 2024 CoP participants reported:

- Greater understand of concerns faced by Metro employees who do not identify as male.
- Stronger allyship, with leaders recognizing how tangible actions can improve workplace culture.
- Improved ability to address workplace behavior that impact gender equity.
- Enhanced collaboration amongst leaders, helping them navigate gender dynamics in personnel management.
- Recognition of the need for open discussions about gender-based harm and workplace equity.

Survey responses showed that most participants found the program valuable and felt it supported their learning. However, some found the self-paced learning format and peer coaching difficult to maintain, despite recognizing their benefits.

## Communities of Practice: Building Up

In mid-2024, King County Metro launched the Building Up Community of Practice (CoP)—a pilot program designed to support women, transgender, and nonbinary leaders. This 8-month initiative was a collaboration between Metro’s Organizational Health & Development (OHD) team and the Office of Equity, Inclusion & Belonging (EIB), featuring rotating facilitators, leadership training, and co-sponsorship.

Building Up CoP focused on centering women’s experiences and equipping leaders with tools to foster healthy workplace culture and psychologically safe workspaces. The CoP aimed to:

- Address isolation through peer connections and networking.
- Provide leadership development and opportunities for BIPOC women in leadership.
- Support white women in leadership to address racism and equity in relation to BIPOC women, transgender and nonbinary employees.

Launched in April 2024, the program ran monthly through October, inviting more than 24 employees, with 15 leaders participating and an average of 10 regularly attending. Over seven sessions, held both in-person and virtually, discussions centered on intersectionality and anti-racism in leadership, co-facilitated by EIB and OHD staff.

Most participants found the program valuable, stating that it built confidence, deepened understanding, and supported leadership growth. Several applied their learnings with their own teams, reinforcing the program’s impact.

Challenges included time constraints, the need to build trust quickly, and a desire for broader culture change within Metro.

The outcomes of both the Undoing Gender Bias CoP and the Building Up CoP are currently under review by Metro leadership to determine future opportunities. For questions or to get involved, email Metro's OHD Team at [MetroOHD@kingcounty.gov](mailto:MetroOHD@kingcounty.gov).

## Business Transformation in Recruitment, On-boarding, and Process

Metro's Employee Services Division and the Talent Acquisition Team continue to drive business transformation efforts to enhance recruitment, onboarding, and employee experience.

Recent progress includes the addition of Continuous Improvement Specialists, who are focused on ensuring a consistent, transparent, and supportive process for all employees. Key focus areas for Continuous Improvement Specialists are:

### 1. Equity-Centered Onboarding

- Developing standardized onboarding materials, including welcome templates and checklists
- Updating mandatory training lists to ensure equal access to essential information.
- Embedding King County and Metro's values of respect and belonging into the onboarding process.

### 2. Improving Employee Experience and Retention

- Partnering with stakeholders to identify and eliminate process inefficiencies.
- Exploring a "Welcome Buddy" program to support new hires.
- Creating tailored resources to meet the diverse needs of Metro's workforce.

### 3. Equitable Probationary Process

- Standardizing probation to ensure clear communication between supervisors and new hires.
- Implementing mandatory check-ins and goal-setting frameworks.
- Prioritizing on employee development and wellbeing during the probationary period.

### 4. Continuous Improvement and Feedback

- Collecting insights through surveys, interviews, and direct conversations. Using feedback to refine processes while upholding equity and inclusion commitments.

### 5. Collaborative Partnerships

- Partnering with divisional leaders, Employee Services Division, Organizational Health and Development teams, and the EEO office.
- Ensuring diverse voices shape solutions that advance Metro's equity, inclusion, and belonging goals.

The Talent Acquisition Team remains committed to:

- **Standardizing recruitment processes**—Implementing uniform recruitment plans, templates, and procedures to ensure a fair and equitable hiring experience.
- **Diversifying the talent pool**—Expanding outreach strategies to attract candidates from underrepresented communities.

- **Reducing bias in the hiring process**—Using structured interviews, diverse panels, and inclusive to ensure fair candidate evaluations.

**Building accurate recruitment data**—Establishing clean data for precise recruitment metrics and equitable hiring decisions.

- **Developing department-wide SOPs**—Create standard operating procedures (SOPs) to address nepotism and conflicts of interest in hiring. These Metro-specific procedures will build from King County’s [Code of Ethics](#) and [DHR's Employment Conflict of Interest policy](#).

Metro remains dedicated to business transformation efforts that strengthen workplace equity, inclusion, and belonging. These initiatives will enhance Metro’s overall business performance while reinforcing Equity and Social Justice (ESJ) principles.

## VM Project Management Resourcing - Updates

EIB leadership secured funding for a new position dedicated to advancing gender equity at Metro. Project Manager Tareca Choi was selected to lead this effort, with a particular focus on Vehicle Maintenance (VM). Below are the latest updates on VM’s gender equity initiatives.

### Recruiting & Hiring

Over the past few years, VM has made strides in increasing gender diversity in its workforce. The percentage of women in VM has grown from roughly 10% to over 12.5%, with notable increases in the mechanic classification, which has risen from one woman in 2022 to six in 2025. Additionally, women have joined classifications that have not had a women represented in years, including Electronic Technician, Sheet Metal Worker, and Apprentice Mechanic roles.

### Outreach and Community Engagement

To support workforce development and expand opportunities for women and underrepresented communities, VM has strengthened its outreach and engagement efforts. The team is currently working with six local trade colleges to train future technicians in various trades, including automotive mechanics. Additionally, VM collaborates with 15 local high schools to provide training and information, helping rebuild internal trade programs and introducing students to career paths in zero-emission technology. Through these efforts, VM reaches high school girls, women interested in trades, and historically underserved communities with information on training and career opportunities.

Partnerships with organizations such as the *Washington Alliance for Better Schools* (WABS) and *The Sustainability Ambassadors* further enhance these efforts by connecting youth with green job opportunities and career resources.

In 2024, VM hosted more than a dozen facility tours for students, educators, and industry partners while also conducting over 20 off-site speaking engagements at high schools and colleges. With five tours already scheduled for the first quarter of 2025, these outreach efforts continue to build momentum.

### **Training and Leadership Development**

VM remains committed to leadership development and mentorship. All senior leaders in VM have participated in the Communities of Practice for Women and Men, fostering discussions on gender equity and inclusion.

### **Mentorship and VM Women's Alliance**

In May 2023, VM launched the Vehicle Maintenance Community Connection (VMCC), a support network adjacent to Metro's WOMEN Employee Resource Group. This group was created to foster community and connection among women, binary, and non-binary individuals in VM, offering resources for personal and professional growth while promoting equity and diversity within the workplace. Since its inception, VMCC has played a critical role in building a more supportive culture within VM. Additional details on its progress can be found in the annual report authored by Stephanie Richardson (VM TASS III).

### **Making Metro Family Friendlier - Update**

In 2023, a group of women met with leadership from Metro and the Amalgamated Transit Union (ATU) 587 to highlight concerns about the challenges faced by employees with caregiving responsibilities, particularly around childcare support.

While many recommendations from those discussions have been incorporated into the Women's Needs Assessment, childcare remains an area requiring further exploration. In response, a working group was formed in 2024 to evaluate potential childcare benefits, and after several discussions, the next step identified was to conduct a Metro-wide survey to assess employees' caregiving needs. The Mobility Hub Team has been engaged to help develop survey questions, ensuring that the results provide meaningful data to guide future decision-making.

# EEO Complaint and Investigation Data

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This section focuses on the workplace investigations conducted by the EEO Office’s Investigation Team and the data collected through its complaint and investigation process.

In 2024, the EEO Investigation Team continued to work to make significant improvements to increase trust in the EEO investigative process, improve transparency and accountability in reporting, and decrease fears of retaliation associated with reporting discrimination or inappropriate conduct. In addition to the new programs and features in this Update, other highlights from 2024 include:

- Created and piloted a new Civil Rights 101 training.
- Completed and personally addressed 119 inquires brought forward by individual employees.
- Implemented a new case tracking management system in order to improve transparent data reporting.
- Reviewed and updated our investigative handbook to ensure that our processes are transparent and available to all Metro employees.

## Introduction to the Complaint Data

One area that the EEO Office continued to focus on in 2024 was working to make EEO investigation data more transparent and available to all employees. While this is just the first step in improving the methods the EEO Office uses to convey and make this information available and accessible, the data below provides information regarding the number of cases opened by the EEO Office, the divisions where the complaints originated, and a breakdown of what protected classes were involved in the allegations.

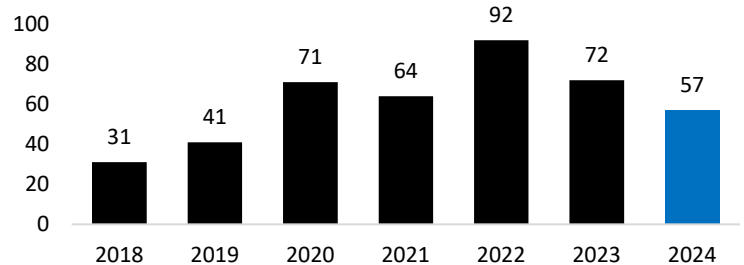
When viewing the data below, it is important to note:

- Prior to 2023, the EEO Office did not have standard procedures to measure and track discrimination data. Thus, data from 2018-2022 is provided with less specificity because the data is less reliable and is provided as general information.
- A case, in this section, refers to any matter that came to the EEO Office that was connected to a protected class and went through a screening and intake process to determine the appropriate next steps, including a formal investigation. A person could contact our office, but it would not be referred to as an EEO case. Example: a person reports they were not paid on time but does not allege discrimination would not be categorized as a case, and would be referred appropriately.

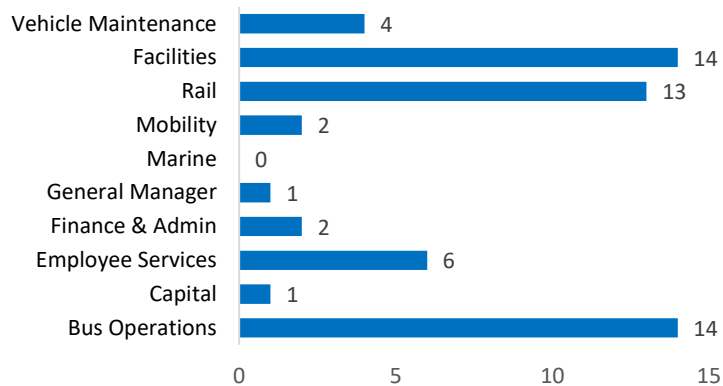
## Data on Cases Filed

**Cases Filed in 2024.** The new standard procedures implemented in 2023 adjusted how inquiries and allegations were categorized in a newly developed intake process. This had an impact on the total number of cases filed in 2023 and 2024. In 2024, the EEO Office reviewed 119 inquiries, many of which prior to 2023 would have been counted in the case totals. So as in 2023, the number of total matters reviewed by the EEO Office is higher than in 2022.

**Figure 1: Total Cases Filed between 2018-2024**



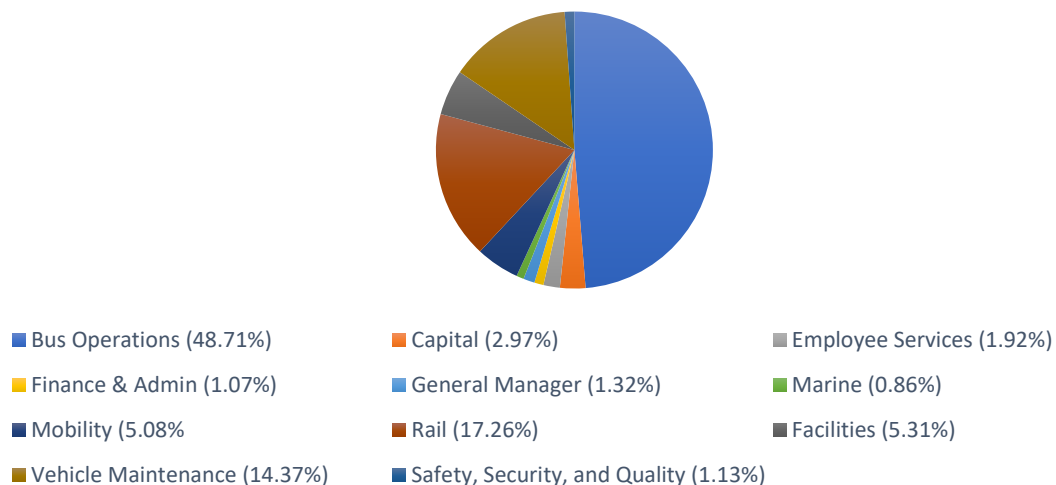
**Figure 2: Complaints by Division in 2024**



### Cases Filed by Division Adjusted for Division Size

More informative than the raw numbers of cases filed above, the figures below show the relative amounts of cases filed per division according to the size of their respective workforce. For example, while most cases originated out of Bus Operations (14 cases account for 24.56% of all cases), Bus Operations accounts for almost half of Metro's total workforce at 48.71%. So the relative number of cases coming out of Bus Operations in 2024 is actually less

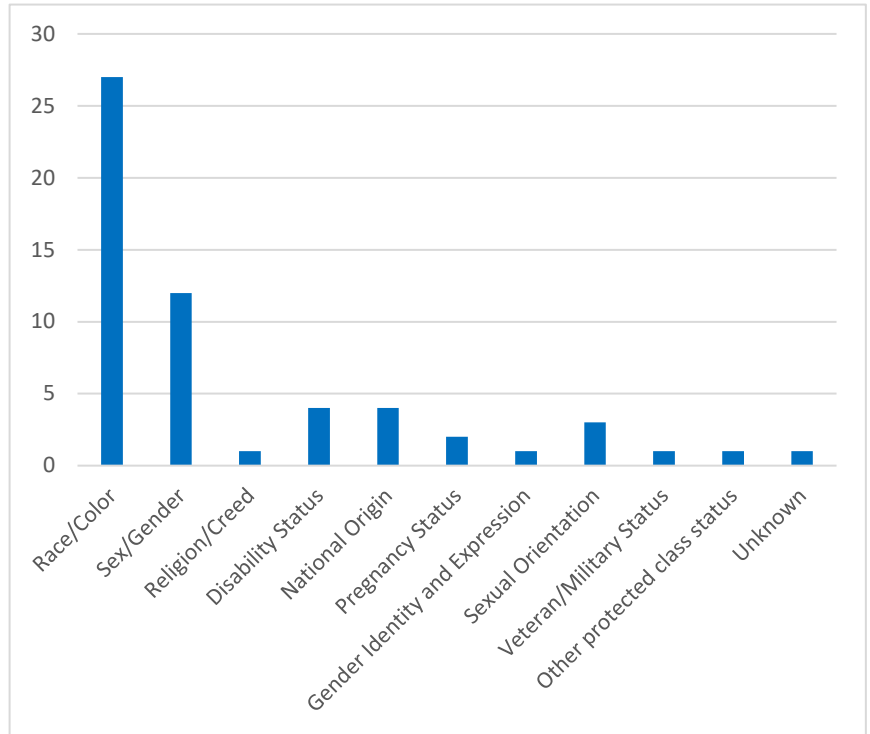
**Figure 3: Relative Size of Metro Divisions**



than what might be expected based on the size of the division.

**Cases Filed by Protected Class.** In 2024, the majority of cases filed with the EEO Office were related to a person’s race or color, followed second by sex or gender. Other cases were filed under, disability status, sexual orientation, and national origin with few cases filed under age, religion/creed, and gender identity and expression.

Figure 4: Complaints by Protected class in 2024	
Race/Color	27
Sex/Gender	12
Religion/Creed	1
Disability Status	4
Marital Status	0
National Origin	4
Pregnancy Status	2
Gender Identity and Expression	1
Genetic Information	0
Sexual Orientation	3
Veteran/Military Status	1
Use of Service Animal	0
Other protected class status	1
Age	0
Unknown	1



# Workforce Analysis

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This section provides an update on Metro’s progress on achieving its employment placement goals, and further explores the demographics of our workforce by division, race, and sex. The EEO Office could previously only report on demographics by race or gender but can now report on the intersection of race and gender. This development in analytics will be essential in ensuring we are strategically investing where our needs are greatest.

## Not a Quota System and Not Used in Hiring Decisions

This analysis is *not* a quota system and is *not* used in hiring decisions. Metro only hires qualified individuals for open positions in accordance with nondiscrimination laws, union contracts, and recruitment best practices. This analysis allows Metro to measure if we are truly recruiting and retaining from the full “pool” of available and qualified applicants – regardless of race or sex.

## Calculating Underutilization and Placement Goals

Metro’s utilization analysis and placement goals were developed by DHR with the assistance of a software called CAAMS. DHR first determined if there was an underutilization of a demographic by comparing the actual number of employees in an employment category versus the expected number of employees that would be in that category based on local demographic employment data. In addition to goals set by CAAMS, DHR employed a modified version of a whole person rule, where:

**If (Number of Expected Employees) – (Number of Current Employees) > 0.5, then a placement goal is created rounding up to the nearest whole number.**

Where underutilization is identified, the FTA requires that short and long-term 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 monitoring progress and achieving equal opportunity for *qualified* women and people of color (minorities) as positions are available.

These goals are set when Metro renews its EEO Program every four years for submission and approval by the FTA, so progress is measured against the goals set in 2022. Metro’s goals are aligned with those found in DHR’s 2022-2025 Equal Employment Opportunity/Affirmative Action (EEO/AA) Plan for the County, available [here](#).

## EEOC Job Categories

For reporting to the FTA, the Metro workforce is divided into Job Categories defined by the EEOC. EEOC Job Categories (also known as Job Groups) are a means to separate various occupations into groups based on job title, skill and knowledge, requirements, and level of institutional responsibility.

Metro has employees and reports on six of the Job Categories: Officials and Administrators, Professionals, Technicians, Administrative Support, Skilled Crafts, and Service Maintenance.

## Progress on Metro’s 2022 Placement Goals

Demographic Group	Officials and Administrators				Professionals				Technicians			
	Goal	2022	2023	2024	Goal	2022	2023	2024	Goal	2022	2023	2024
Asian	1	1	1	1	18	36	86	136	1	0	1	3
Hispanic	1	1	1	1	9	18	33	52	2	1	2	4
Black												
Native American					4	4	6	8				
Pacific Islander					2	4	9	13	1	0	0	0
Two or More Races	1	0	1	1					1	0	1	3
Female									2	1	1	2

Demographic Group	Administrative Support				Service Maintenance				Skilled Craft			
	Goal	2022	2023	2024	Goal	2022	2023	2024	Goal	2022	2023	2024
Asian												
Hispanic	4	5	7	12	13	17	35	86	10	16	37	69
Black									40	28	71	124
Native American												
Pacific Islander												
Two or More Races					19	14	31	74				
Female					319	59	139	233	55	7	25	44

**Figure 4:** Placement goal progress for years 2022-2024. Grey sections indicate no placement goal was set in 2022. Blue sections indicate Metro achieving its placement goals. Green sections indicate Metro exceeded its placement goals. Orange sections indicate that Metro has not achieved its placement goals.

As of December 31, 2024, Metro had achieved or exceeded 16 of its 19 placement goals.<sup>1</sup> Three goals were not achieved for the following groups: Pacific Islander technicians, Female service maintenance, and Female skilled craft. Notably, the under-utilization of women in the trades continues to be an area of focus as progress to achieve the placement. For both Service Maintenance and Skilled Craft, trends indicate Metro will meet or substantially meet its placement goals.

It should be noted that the underutilization of women in the workforce, particularly in the trades, is not unique to Metro. For example, in their last EEO Program Report, LA Metro published that they also had an underutilization of women in six of the eight EEO categories for women with underutilization rates of 14.8% for technicians, 65.8% for skilled workers, and 26.6% for service maintenance.

<sup>1</sup> Metro’s progress in 2022 was incorrectly reported in DHR’s 2023 EEO/AA Program Update. The data found in this report has been validated as accurate by DHR and should be used in future reporting.

# Workforce Demographics

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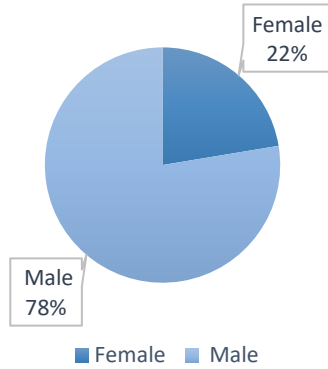
This section provides a snapshot of the demographic makeup of Metro and all its divisions. Raw data was received from DHR, distilled, and organized to report on the Gender Diversity and Racial Diversity of all of Metro and each division's workforce. The data presented here was the basis developing the placement goals in the previous section on Workforce Analysis.

As you navigate this section, please note the following:

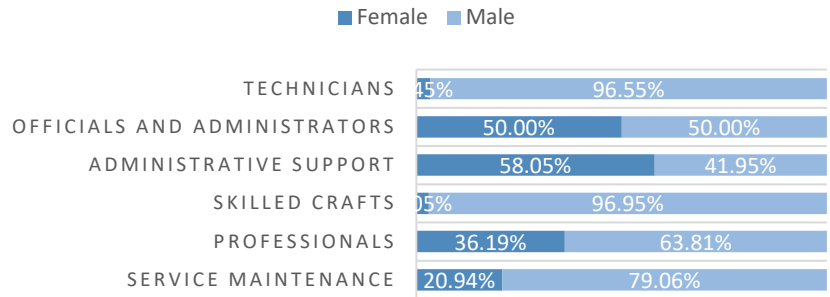
- All data presented is from 2022 and is unchanged from previous updates. This is because the EEO Office monitors growth and progress in four-year increments. While more current data is available, comparing those numbers to our four-year goals would lead to confusing and unhelpful results. For more current employment data, please contact our EEO Office.
- This is the final year these demographic numbers. Next year, in 2026, the EEO Office will generate new demographic profiles that align with the EEO goals and measurements generated by DHR.
- As explained on page 8, this report's language is limited in how it describes people and people groups. The data here is limited to a male/female sex designation and does not account for transgender, non-binary, or those employees who have an X gender marker.
- In some cases, EEO job categories may be missing from some divisions. This is either because that division does not have employees in that category, or there were fewer than five employees in that category. If a job category was not listed, that did not affect the total numbers and percentages.
- None of the data presented in this section should be construed to mean that there is anything "wrong" or that there is an unwelcoming environment for a group. The data presented is purely informative so that Metro, its divisions, and its workforce can better understand itself as a large and complex transportation agency.
- This data does *not* establish a quota system and is *not* used in hiring decisions. Metro only hires qualified individuals for open positions in accordance with nondiscrimination laws, union contracts, and recruitment best practices. This data allows Metro and divisions to see who is represented in their workplace.

# Workforce Demographics – All Divisions Combined

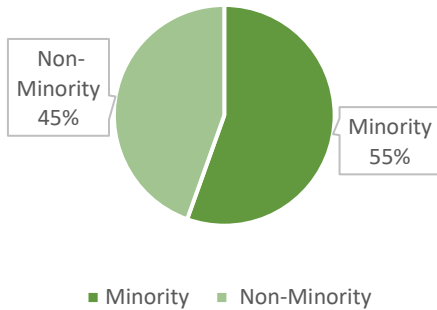
## GENDER DIVERSITY



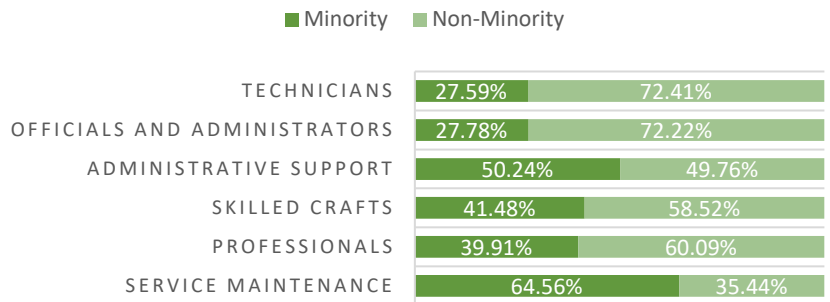
## GENDER DIVERSITY BY JOB CATEGORY



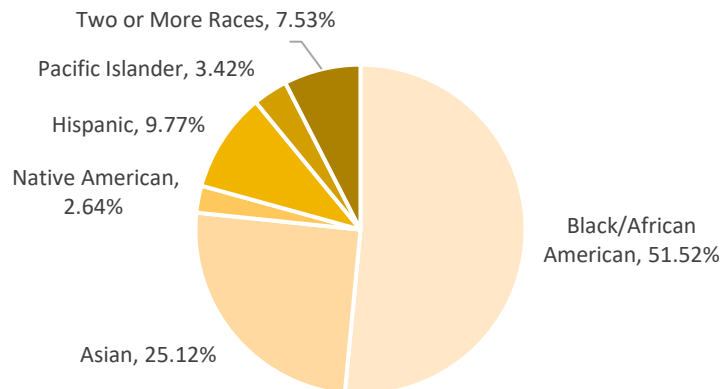
## RACIAL DIVERSITY



## RACIAL DIVERSITY BY JOB CATEGORY

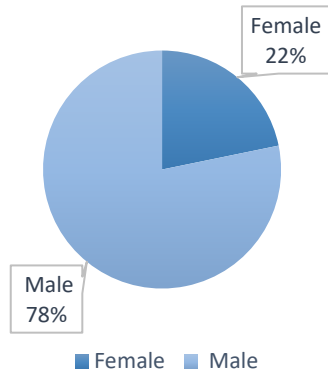


## RACIAL DIVERSITY BY MINORITY GROUP

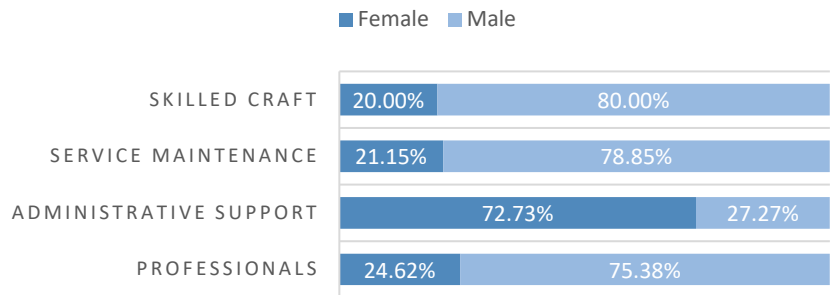


# Workforce Demographics – Bus Operations

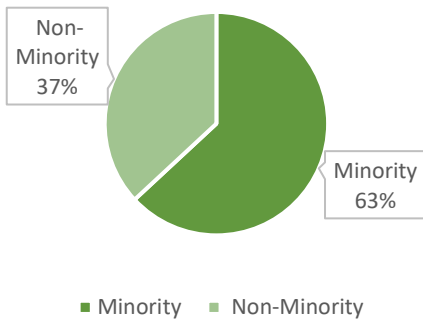
## GENDER DIVERSITY



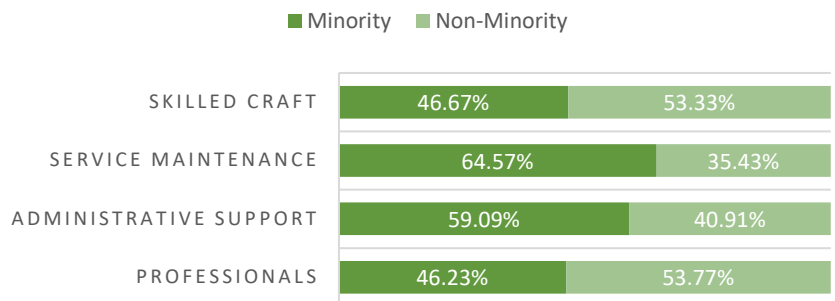
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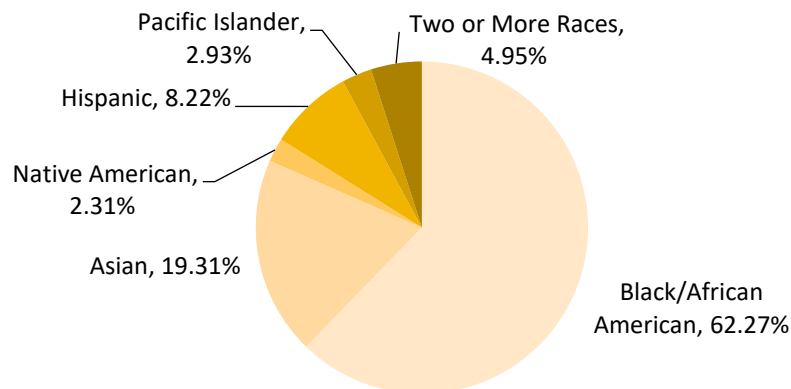
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## RACIAL DIVERSITY BY JOB CATEGORY

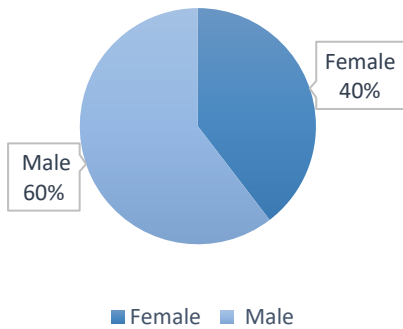


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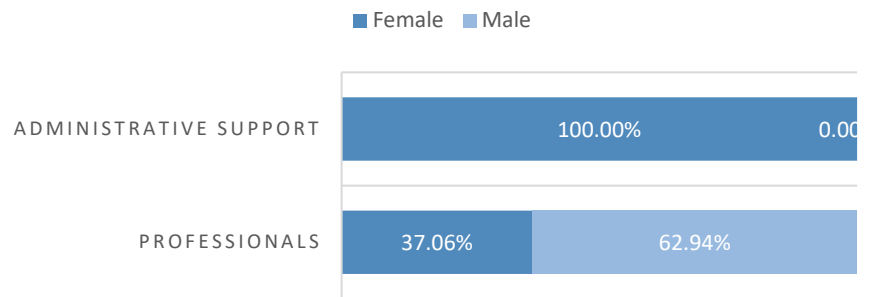


# Workforce Demographics – Capital

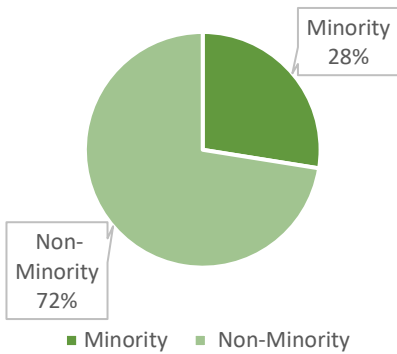
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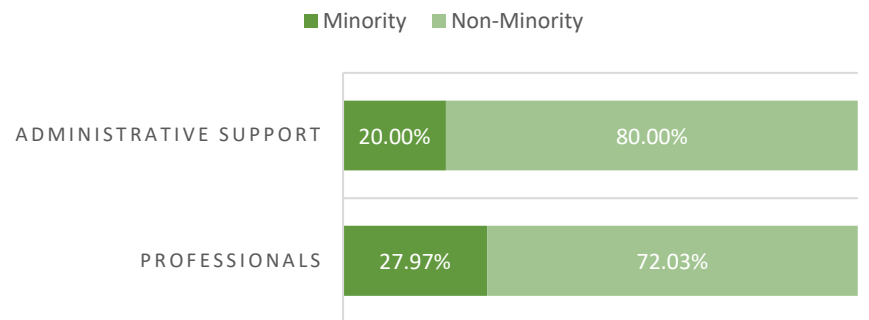
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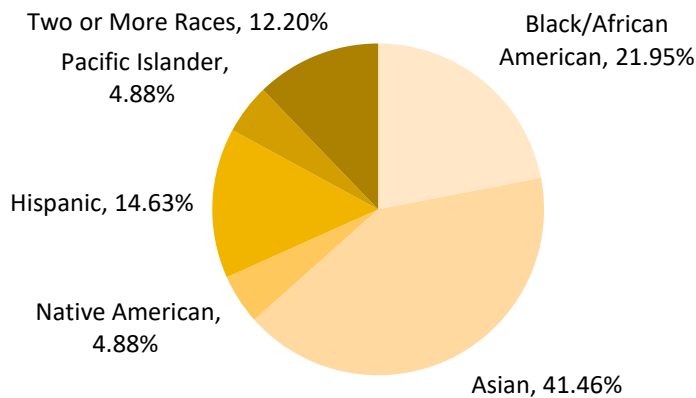
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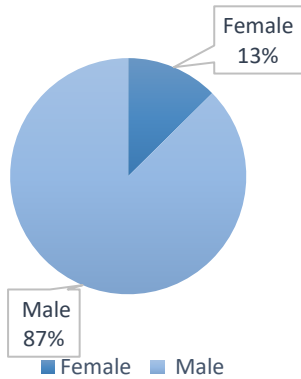


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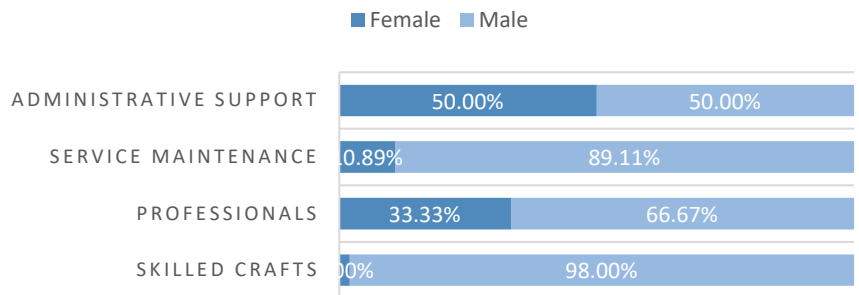


# Workforce Demographics – Facilities

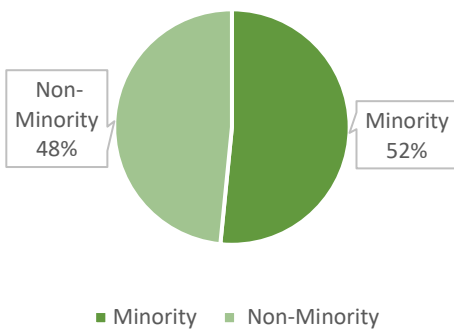
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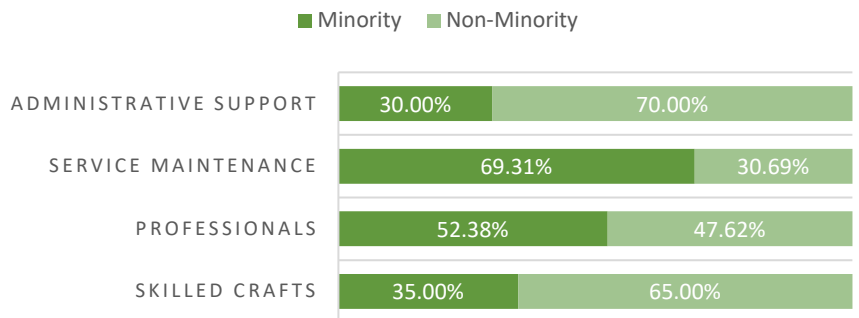
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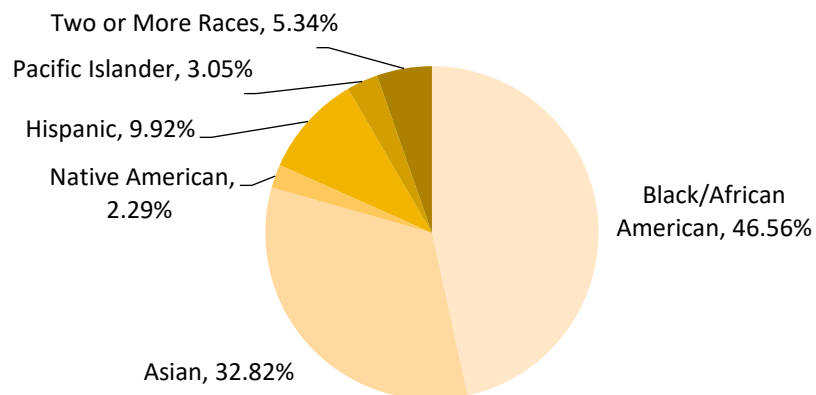
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## RACIAL DIVERSITY BY JOB CATEGORY

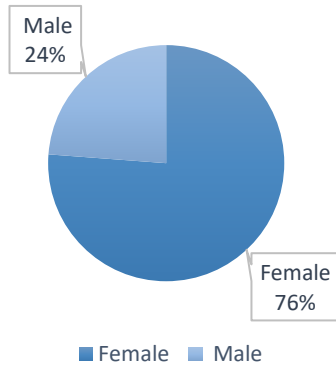


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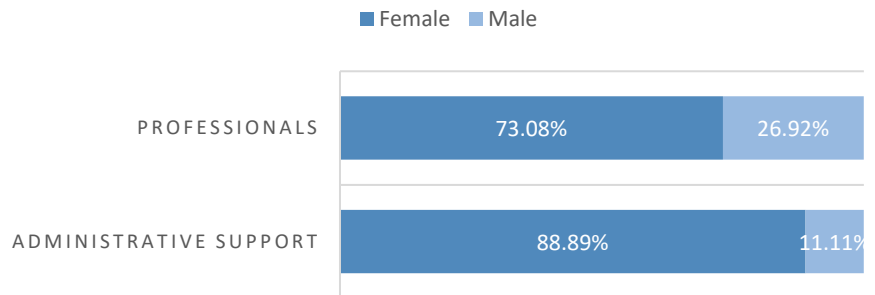


# Workforce Demographics – Employee Services

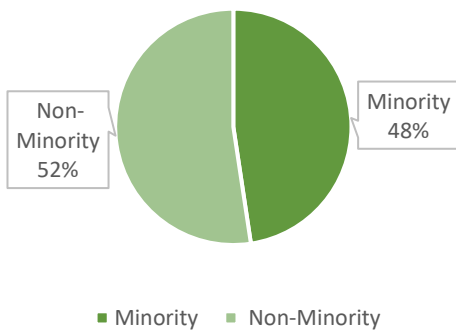
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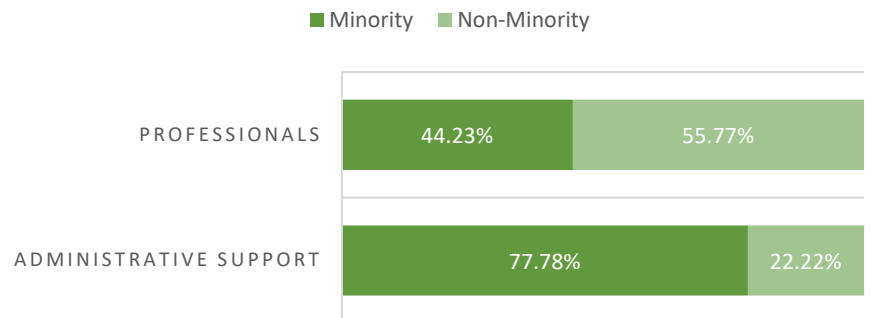
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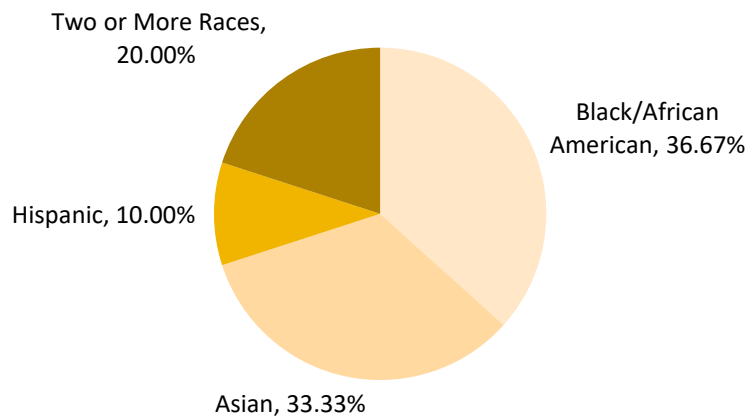
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## RACIAL DIVERSITY BY JOB CATEGORY

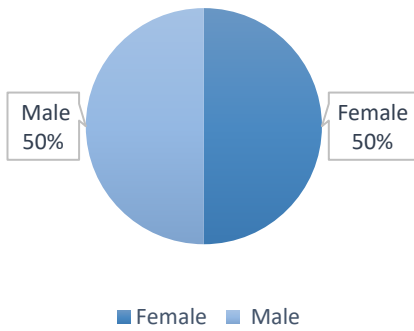


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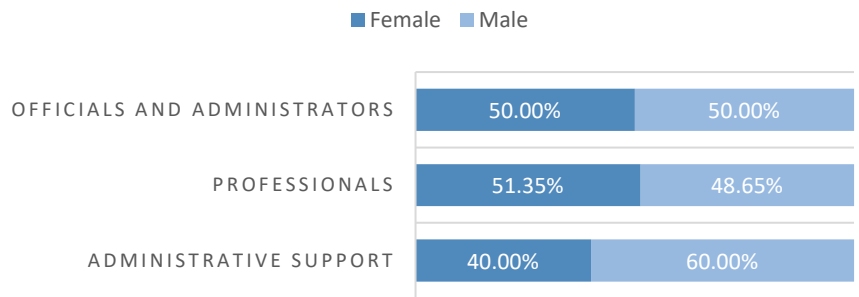


# Workforce Demographics – Finance and Administration

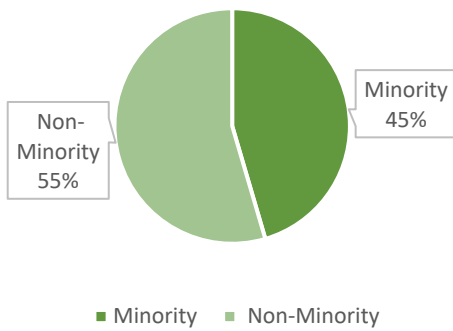
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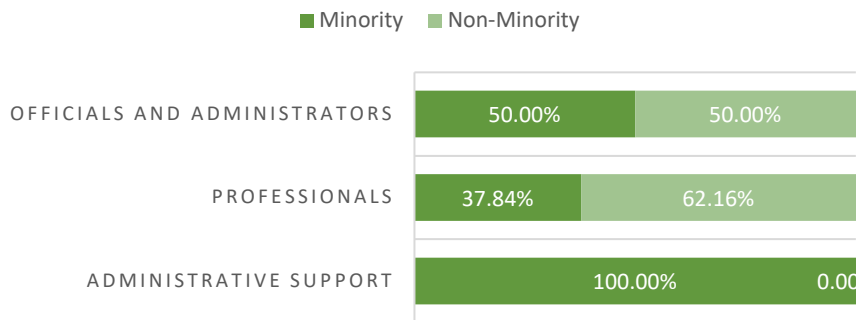
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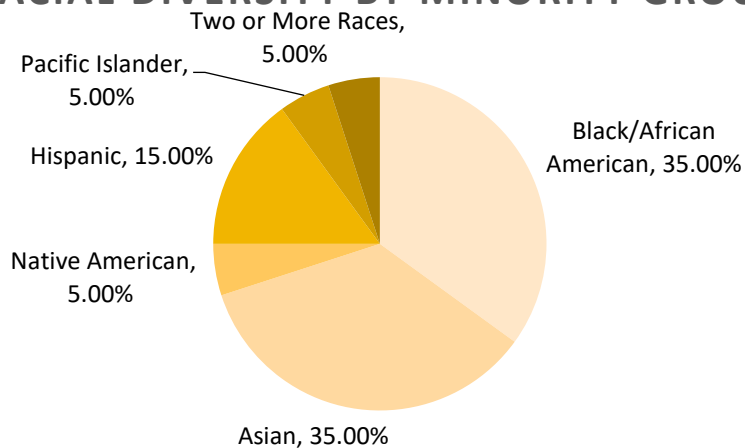
## RACIAL DIVERSITY



## RACIAL DIVERSITY BY JOB CATEGORY

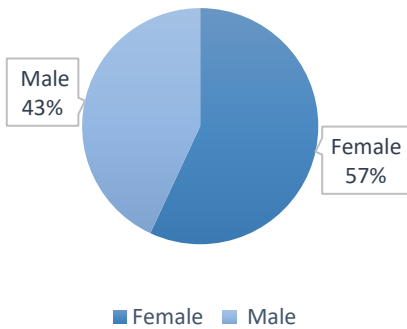


## RACIAL DIVERSITY BY MINORITY GROUP

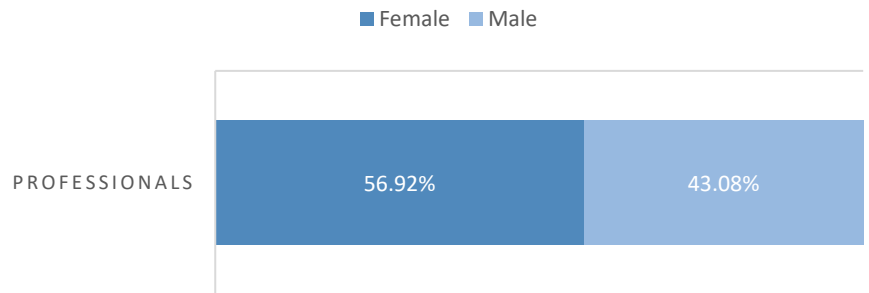


# Workforce Demographics – General Manager

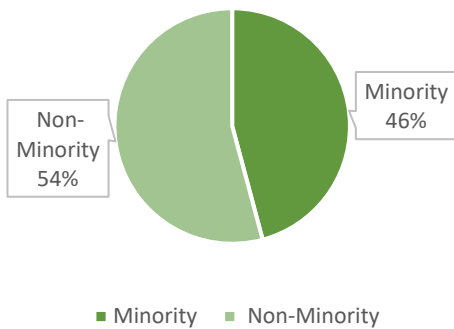
## GENDER DIVERSITY



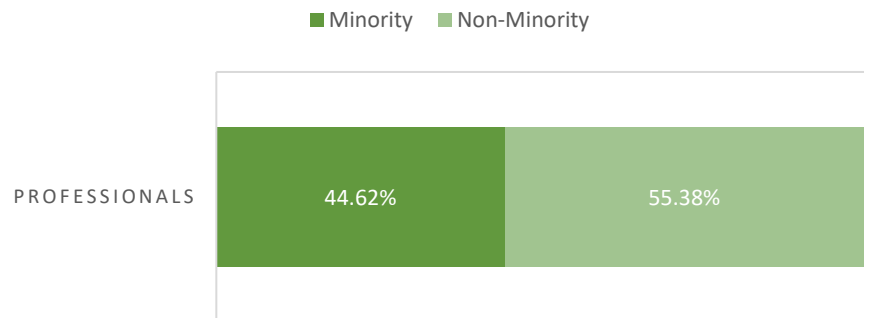
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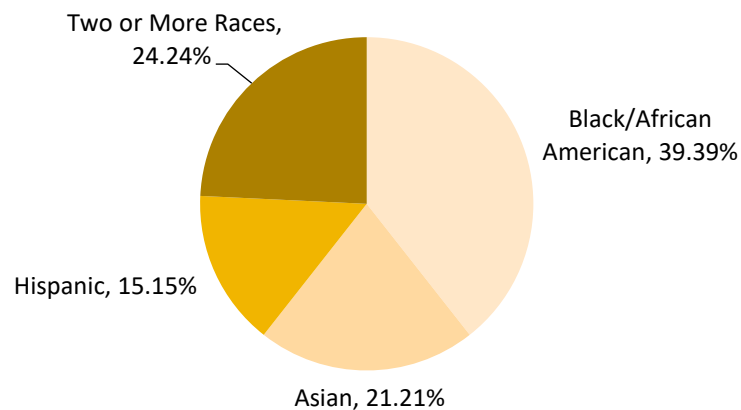
## RACIAL DIVERSITY



## RACIAL DIVERSITY BY JOB CATEGORY

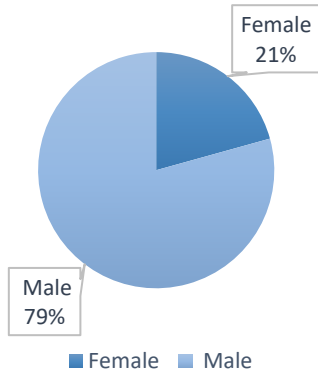


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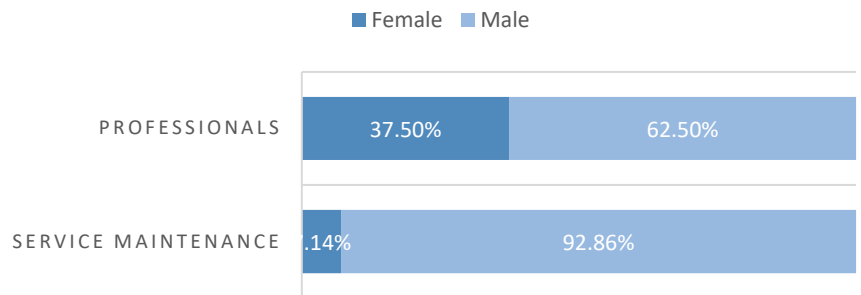


# Workforce Demographics – Marine

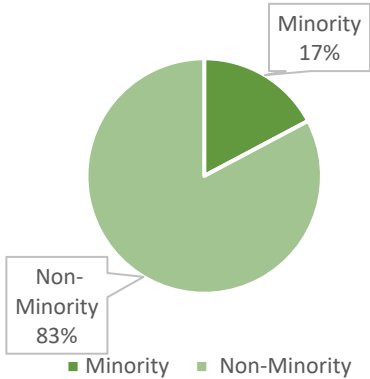
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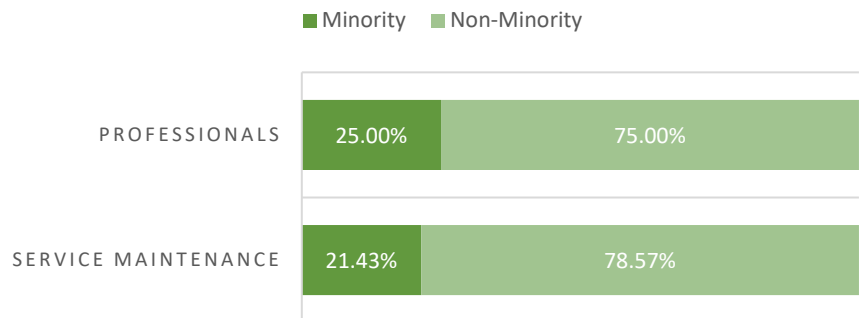
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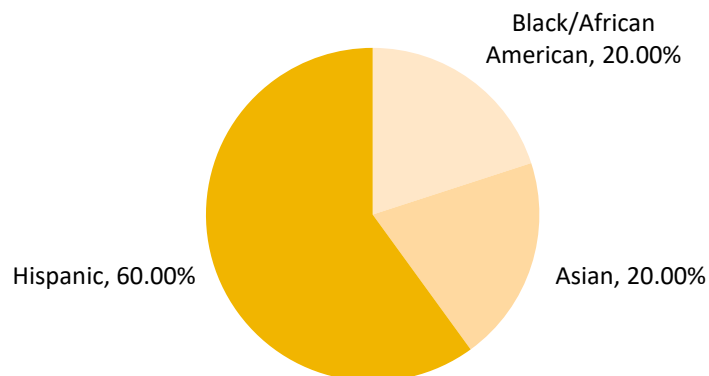
## RACIAL DIVERSITY



## RACIAL DIVERSITY BY JOB CATEGORY

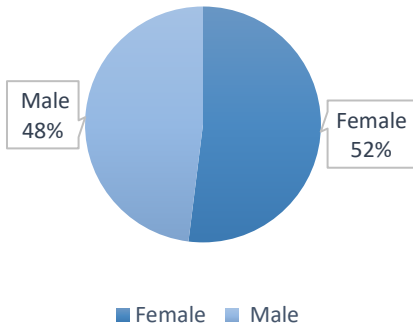


## RACIAL DIVERSITY BY MINORITY GROUP

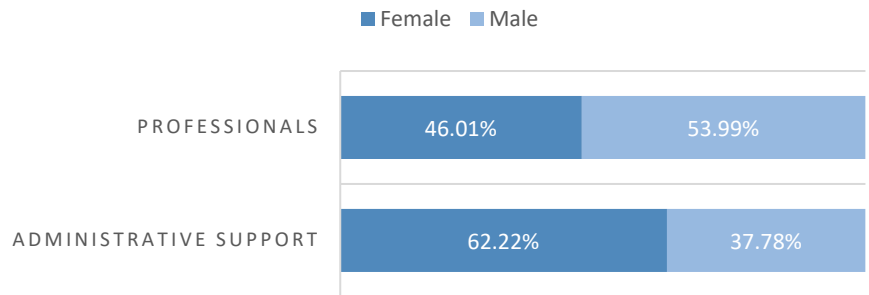


# Workforce Demographics – Mobility

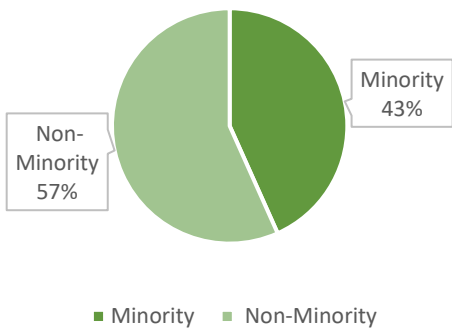
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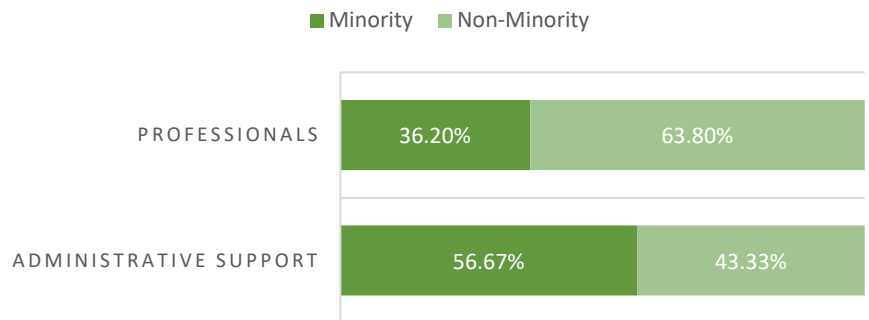
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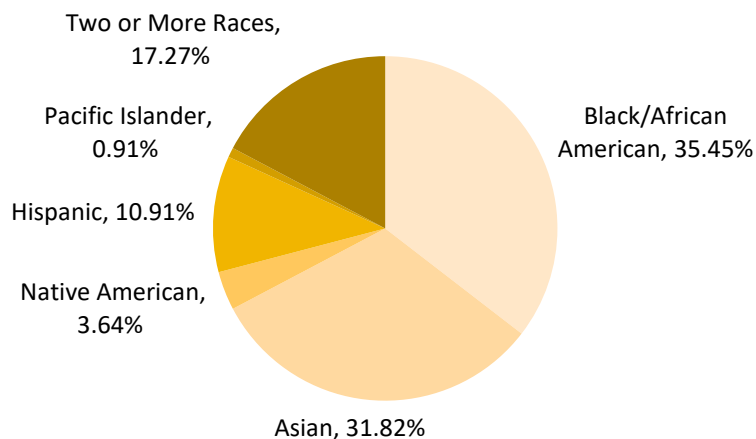
## RACIAL DIVERSITY



## RACIAL DIVERSITY BY JOB CATEGORY

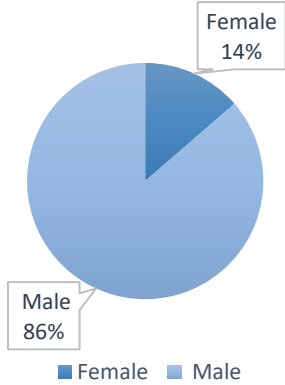


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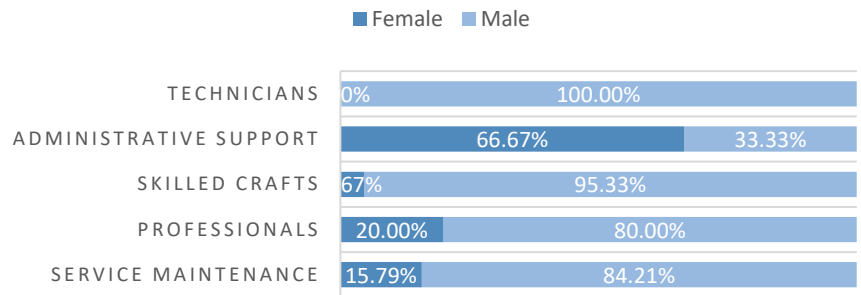


# Workforce Demographics – Rail

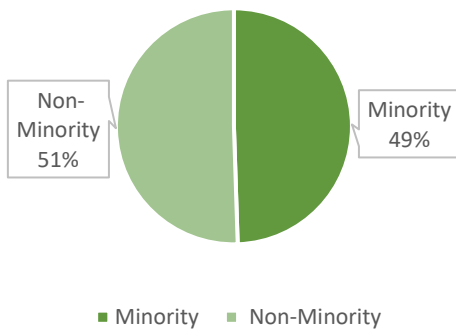
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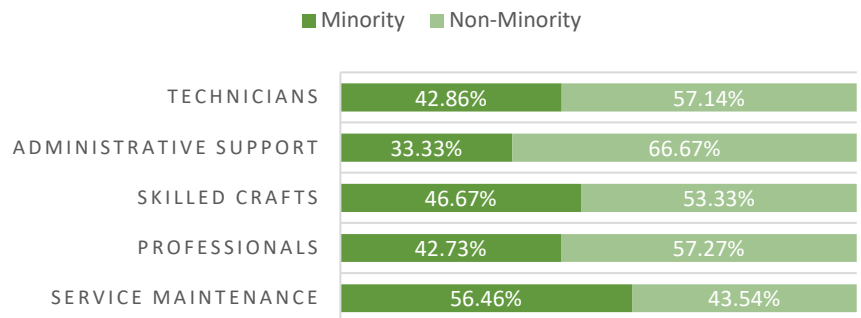
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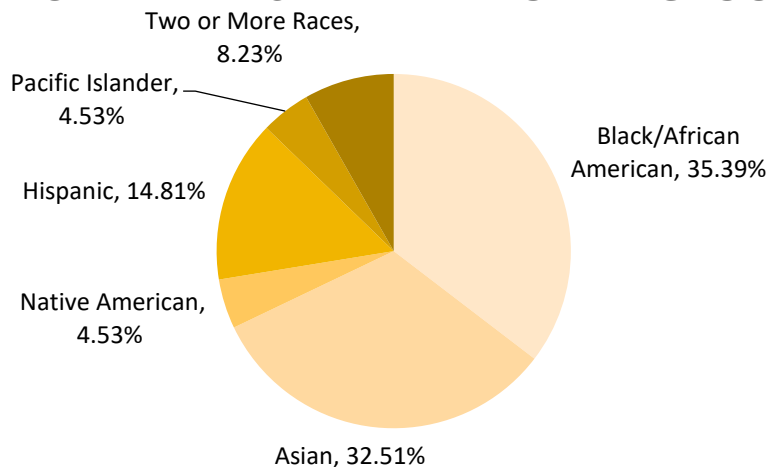
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## RACIAL DIVERSITY BY JOB CATEGORY

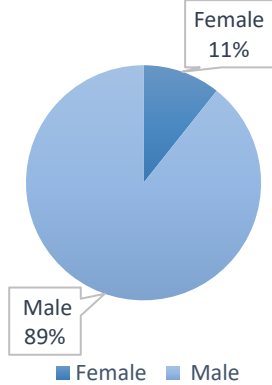


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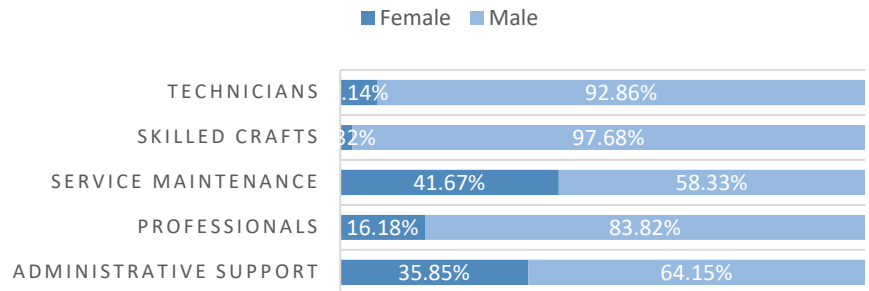


# Workforce Demographics – Vehicle Maintenance

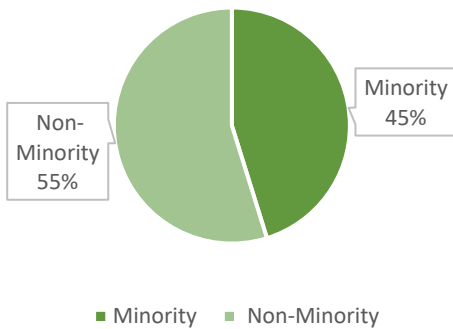
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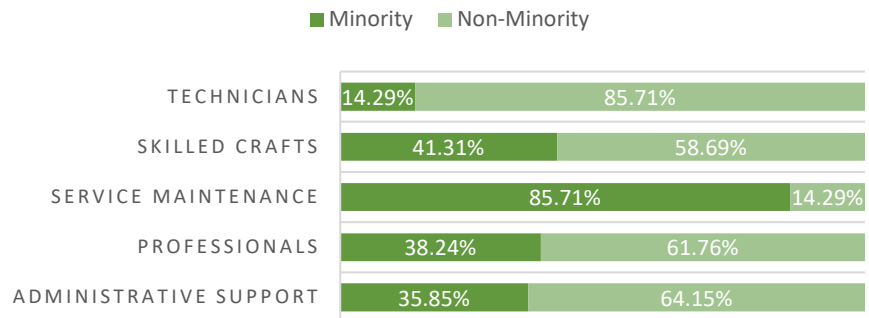
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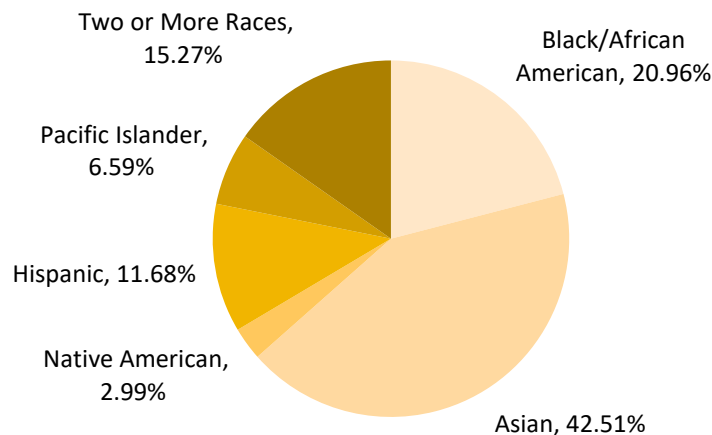
## RACIAL DIVERSITY



## RACIAL DIVERSITY BY JOB CATEGORY



## RACIAL DIVERSITY BY MINORITY GROUP



# How to File a Complaint

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Metro employees and applicants for employment may contact the EEO Office anytime using the information below to file a complaint or ask questions about their rights under EEO law. Information on how to contact the EEO Office, to make a complaint, or report discrimination is also posted throughout Metro, and include Metro’s EEO Policy Statement and The Way We Work Together posters.

**Metro EEO Office**

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

Employees and applicants for employment may also file complaints of employment discrimination to entities outside of Metro. Filing with another office or agency may affect your ability to file with the EEO Office, so employees are encouraged to speak with the EEO Office to ensure their rights are protected:

**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>

# Conclusion & Next Steps

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## Next Steps & The ‘Inside’ Long Game

As stated in previous years, we practice our Long Game through the virtuous cycle of continuously demonstrating that mobility is human right, investing resources to grow capacity, and measuring outcomes; we now need to look inwards and do the same.

This “inside” Long Game invites us to recognize that it is a right for all our employees to have the opportunity to thrive in a workplace free from discrimination, and as we invest in programming and capacity to create those conditions, there must be measurable outcomes that we examine regularly to justify further investment or make adjustment.

Over the next year, Metro will continue to invest in the programs in this Update, evaluate their values based on the measurable outcomes in employment data, receive critical feedback, adjust, and make improvements to our systems.

Next year will be the last Update before a new EEO Program is due to the FTA where our placement goals and employment metrics will be updated. The EEO Office looks forward to continuing to work alongside its partners and the entire Metro workforce in connecting civil rights to equity.



“FIRST FORGET INSPIRATION. HABIT IS MORE DEPENDABLE. HABIT WILL SUSTAIN YOU WHETHER YOU’RE INSPIRED OR NOT. HABIT WILL HELP YOU FINISH AND POLISH YOUR STORIES. INSPIRATION WON’T. HABIT IS PERSISTENCE IN PRACTICE.”

- OCTAVIA BUTLER



## King County Metro Transit (Metro) Equal Employment Opportunity

### Policy Statement

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/or 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](mailto:MetroEEO@kingcounty.gov)  
Phone: 206-477-9454

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.

**Michelle Allison**  
General Manager, King County Metro Transit (Metro)

January 20, 2023

Date

To request this information in your native language, please email [metro.equity@kingcounty.gov](mailto:metro.equity@kingcounty.gov) or call 206-205-8000.

**Spanish** - Para solicitar esta información en Español, sírvase llamar al [metro.equity@kingcounty.gov](mailto:metro.equity@kingcounty.gov) o envíe un mensaje de correo electrónico a 206-205-8000.

**Chinese** - 如果要索取本資訊的中文版, 請致電 [metro.equity@kingcounty.gov](mailto:metro.equity@kingcounty.gov) 或發電郵給 206-205-8000.

**Vietnamese** - Để có các thông tin này bằng tiếng Việt, xin gọi số [metro.equity@kingcounty.gov](mailto:metro.equity@kingcounty.gov) hoặc gửi điện thư đến 206-205-8000.

**Somali** - Si aad u weyddisato maad ku hiesto macluumaadkan Af-Soomaalii, fadlan wac [metro.equity@kingcounty.gov](mailto:metro.equity@kingcounty.gov) ama timayl u dir 206-205-8000.

# Equal Employment Opportunity Office (EEO) Investigation Process

## Process

### START HERE



#### Report is made

A report is submitted online, by phone, mail, in person, or the EEO Office learns of a situation via employees, union reps, directors, managers, superintendents or base chiefs.



#### Case file created

The reported case is logged immediately, assigned a case number, and may be sent to other county partners as appropriate.



**No investigation:** The EEO Office will communicate why and discuss other options.



#### Intake – Review of Allegations

After receiving a report, the EEO Office will schedule an intake meeting to learn more about the incident.

The EEO office will then determine and communicate whether the case can move forward with a formal investigation following the intake meeting.

**Yes investigation:** a formal complaint will be drafted.



#### Formal complaint drafted

The EEO Office will draft a formal complaint that explains the allegations and scope of the investigation.



#### Notices

The EEO Office will notify all parties and the Coordination Team\* that an investigation has begun with a copy of the formal complaint, an explanation of rights, the process, and other important information.



#### Findings report

The EEO Office will draft the Finding Report to be reviewed by the EEO officer with all case information, findings, and conclusion.



#### Investigation

The EEO Office will gather information, interview witnesses, and give all parties an opportunity to provide information and evidence they wish to be considered.



#### Closure & Findings meeting

The EEO Office provides their findings in the Coordination Team\* meeting. The EEO Office will send Notices of Investigative Closure to the parties.



#### Formal Investigation Process complete

The EEO Office's involvement in this process is completed. The investigation outcomes and any additional steps will vary depending on findings.

\*The Coordination Team promotes transparency and accountability. It consists of leadership from EEO, Metro HR, Transit Employee Labor Relations, Metro EIB, and DHR Workforce Equity.

# The Way We Work Together

## Experiencing discrimination, harassment or retaliation?


### Report it.

If you experience or witness inappropriate behavior in the workplace—you have the right to report it to your supervisor, Metro EEO, or Metro Human Resources Manager.


Metro is committed to creating a workplace free from discrimination, inappropriate conduct, harassment, and workplace retaliation for all employees.



I have repeatedly asked not to be hugged, but my requests are ignored. I called EEO to know what my rights are.



I was called names by a co-worker, but when I asked for it to stop, I was told it was “just a joke.” I contacted EEO about what I could do.



I am tired of hearing inappropriate and sexual comments on the shop floor, so I reported it to my supervisor and emailed EEO.

### How to report

<b>Metro EEO Office</b> 206-477-9454 MetroEEO@kingcounty.gov	<b>Metro Human Resources Manager</b> 206-477-6000 MetroHRManager@kingcounty.gov
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Or contact King County's Department of Human Resources, more information in the link below.



Scan the QR code to learn more or visit:  
[kingcounty.gov/metro/employeeeculture](https://kingcounty.gov/metro/employeeeculture)



Assessment Proposal	Status & Context	Metro Response
<b>Workplace Health &amp; Safety, Starting on Page 40 of the Assessment</b>		
<b>1. Collaborative Solution Designing</b>		
Establish collaborative problem-solving with front-line supervisors and employees	Complete - Existing Structures and Policies in Place	Collaborative spaces and groups, like Speak Listen Communicate team, the SaFe Equity Workgroup, EEO Office, and various operational spaces, offer front-line employees the opportunities to design solutions to workplace issues. ATU 587 has also formed a new Transit Safety and Security Task Force. Interested employees should also see Metro's Public Transportation Agency Safety Plan.
Evaluate effectiveness and outcomes of protocols for security incidents with general public	Complete - Existing Structures and Policies in Place	See Metro's Public Transportation Agency Safety Plan, Section II Safety Assurance, Safety Performance Monitoring and Measurement, Management of Change, and Continuous Improvement.
Update and post rights and responsibilities of Metro passengers	Complete - Implementing	In January 2025, the Ride Right campaign refreshed Metro's Code of Conduct and posted in all Metro buses, the Pass Sales Office, and other transit spaces with content informed by the SaFe Equity Workgroup, prioritizing what matters most to operators and riders.
Increase KC Law Enforcement presence to pre-pandemic levels	Complete - Implementing	Metro has doubled the number of Transit Security Officers from pre-pandemics levels. The Sherriff's Office and Metro Transit Police also continue to recruit and increase their presence and have added additional Transit Resource Officers.
<b>2. Expand Safety Protocols, Employee Training &amp; Supervisor Support</b>		
Establish protocols for people managers to conduct safety and well-being check-ins and annual plans	Requires Additional Research	Various elements of this proposal are already in progress and implemented; however, what this proposal means for the different kinds of people managers, operational spaces, and lines of Metro business requires further study to understand specific need and strategic implementation.
Establish SOPs and expand training on how to interact with those who are unhoused, have mental illness, substance abuse, etc.	Complete - Existing Structures and Policies in Place	See De-escalation Training and Critical Incidents SOP.
Train supervisors to show care and concern and empathy	Complete - Existing Structures and Policies in Place	See Welfare Check SOP and Critical Incidents SOP.
<b>3. Safety Equipment &amp; Environment</b>		
Provide more parking options and/or security in reserved lots; and gender-sensitive options for quiet and rest spaces	Complete - Existing Structures and Policies in Place	More research is required to understand where investments could be made to expand parking, security, and rest spaces and resources. This topic may be added to the 2025 Metro EEO Survey to gather this data and provide realistic options moving forward.

4. Graveyard Shift-Specific		
Ensure no employee is working alone on-site, especially at night and implement the following: security escort offers, buddy stems, radios for improved communication where phone signals are poor, and better lighting at worksites	Requires Additional Research	More research is required to understand where and what investments could be made to increase safety for graveyard shift employees. This topic will be added to the 2025 Metro EEO Survey to gather this data and provide realistic options moving forward, emphasizing the need for targeted outreach efforts for the survey to graveyard shift employees.
5. Bus Ops-Specific		
Reimplement fare enforcement	Complete - Implementing	Fare inspection was paused in March 2020, but riders were always expected to pay fares. Fare inspection has resumed, and the full breadth of fare inspection will be in place by Q2 of 2025.
Investing in and installing new safety shields or enclosed driving spaces on coaches	In Progress	Operator safety is a top priority. Metro's Vehicle Maintenance and Safety & Security Divisions are actively researching and finalizing plans to update the safety shields and driving spaces.
Create safety incident response protocols	Complete - Implementing	See Critical Incidents SOP.
Offer more safety trainings, more support tools, overtime options, and cleaner comfort stations that aren't shared with the general public	Not Started - Requires Additional Research	Various elements of this proposal are already in progress and implemented; however, what this proposal means for the different kinds of people managers, operational spaces, and lines of Metro business requires further study to understand specific need and strategic implementation.
Update HVAC system and sanitary levels and expectations on coaches.	Complete	In late 2023, Metro responded to a study by the UW regarding air quality and drug smoke residue on public transportation including: upgrading ventilation of all coaches to the highest level of filtration available transit vehicles. Metro also launched a deep cleaning protocol that resulted in cleaner coaches and elimination of detectable levels of fentanyl and methamphetamines.
Support & Training in Current Job, Starting on Page 43 of the Assessment		
1. Assess Training Content & Delivery		
Conduct comprehensive division-based re-evaluations of content and delivery of skills-based tests and trainings	In Progress	See the Desired Future State Section of this Report starting on page 12.
Standardize skills-based and on-the-job training with equal access	In Progress	See the Desired Future State Section of this Report starting on page 12.
Develop transparent and standard onboarding and annual training checklists	In Progress	See the Business Transformation in Recruitment, on Boarding and Process Section of this Report starting on page 22.

Standardize EEO, sexual harassment and other equity-related trainings into onboarding	In Progress	See the Business Transformation in Recruitment, on Boarding and Process Section of this Report starting on page 22. In addition to the efforts of The Way We Work Together training, the EEO Office has already standardized its trainings is working with its partners in Employee Services to integrate training and knowledge set in to onboarding.
<b>2. Mandatory Training &amp; Annual Review</b>		
Require all employees to attend annual EEO legal and policy compliance trainings, including sexual harassment, and consequences for non-compliance for all employees	Complete - Existing Structures and Policies in Place	The Way We Work Together is Metro’s anti-harassment, non-discrimination training that fosters a healthy workplace. Completion rates since launch of the course are below. As new staff are hired, they are required to take TWWWT as part of the onboarding process. 2,146 employees completed TWWWT, including 90% of all Metro people leaders have completed or enrolled in the supervisory version of the training.
Create appropriate conduct trainings based on updated proposed codes of conduct	Not Started - Requires Additional Research	Unable to start. See comments below, "Strengthen Existing Codes of Conduct"
<b>3. Supervision Best Practices</b>		
Develop new employee onboarding checklists with standardized and narrowly customized elements related to specific job	In Progress	See the Business Transformation in Recruitment, on Boarding and Process Section of this Report starting on page 22.
Incorporate 360-degree assessments for people managers’ professional development	Not Started - Requires Additional Partnership	See the Desired Future State Section of this Report starting on page 12 for details.
Develop and deploy leadership development resources (follow union contract while also demonstrating empathy, respect, and modeling a growth mindset) with assigned liaisons	In Progress	See the Desired Future State Section of this Report starting on page 12 for details.
Regularly scheduled supervisor check-ins with all direct reports using a check-in template	Not Started - Requires Additional Research	Metro already has regularity and uniformity in some kinds of check-ins (performance appraisals, for example); however, what this proposal means for the different kinds of people managers, operational spaces, and lines of Metro business requires further study to understand specific need and strategic implementation.
<b>4. Systems and Tool Access</b>		
Checklists to ensure equal access to equipment and tools.	Complete - Existing Structures and Policies in Place	Division leadership and people leaders in charge of equipment access should be notified if any needs are unmet.

Checklists to ensure equal access to administrative resources (including for graveyard shift workers)	Complete - Existing Structures and Policies in Place	Division leadership and people leaders ensure that all employees, regardless of shift or work location, have equal access to administrative and other resources. Deficiencies in access should be raised through the proper channels and chains of command.
<b>5. Work-Life Balance</b>		
Co-create—with the most impacted employees—innovative approaches to flexible scheduling	Not Started - Requires Partnership	Metro supports its current bargaining agreements and provisions related to seniority. Decisions that affect scheduling must be appropriately negotiated with our union partners.
Provide more resting areas and coffee stations	In Progress	The addition of more comfort stations, resting and coffee stations is an on-going process that requires staffing, maintenance, creating good relationships with communities and business owners, and research. Recently, in early 2025, Metro completed the Eastlake Layover Facility in partnership with SDOT and WSDOT, to provide operators with a comfortable, dedicated space to take breaks between trips.
<b>Performance Management, Addressing Workplace Bullying &amp; Other Inappropriate Conduct, Starting on Page 44 of the Assessment</b>		
<b>1. Strengthen Data Tracking, Processes, Communication &amp; Outcomes</b>		
Centralized tracking and reporting system for progressive disciplinary outcomes data for EEO and non-EEO-related complaints	In Progress	Metro recently completed building a custom case and data management system for EEO related complaints. See page 4 of this Report. This system, with the Coordination Team, is currently being tested for reporting capabilities. The case management system for Non-EEO-related complaints are still under development by DHR with completion expected by Q4 2025.
Create clear processes and expectations for a complaint lifecycle for EEO and non-EEO-related complaints	In Progress	The EEO Office has created a handbook, FAQ, and "roadmap" that details all; see page 4 of this Report. Process for non-EEO related complaints are less defined and will be a priority for development in 2026 for our HRBP and TELR teams, pending the completion of DHR's case management system.
<b>2. Strengthen Existing Codes of Conduct</b>		
Standardize and unify codes of conduct to address behaviors associated with workplace bullying and matters outside the scope of EEO that include leadership behaviors, clear consequences for non-compliance, and HR protocols and procedures for addressing noncompliance	Not Started - Requires Additional Research	While some Metro divisions do have behavioral expectations in place, there is no unifying code of conduct to address behaviors associated with bullying that falls outside of the scope of the EEO Office or County's Nondiscrimination Policy. Further research and understanding of these policies, labor implications, and existing procedures is required before attempts to unify or standardize.
<b>3. Policy Development</b>		

Work with other County partners to establish a King County workplace bullying and retaliation policy in alignment with True North Values and union contracts	Not Started - Requires Partnership	Metro is unable to move this forward without partnership from the Executive, and any such policy needs to come from DHR.
<b>4. Grievance Hearings</b>		
Allow for both union members to be given an advocate in grievance hearings, not just the one being accused	Not Started - Requires Partnership	Metro is unable to move forward without appropriate discussions with appropriate labor partners. This proposal will be shared with Metro's labor team for further consideration.
Offer separate union representation between supervisors and individual contributes to reduce real or perceived conflicts of interest	Not Started - Requires Partnership	Metro is unable to move forward without appropriate discussions with appropriate labor partners. This proposal will be shared with Metro's labor team for further consideration.
<b>5. Conduct Comprehensive Analysis of Expectations Landscape</b>		
Conduct a comprehensive analysis of all policies related to behavioral expectations, HR complaint investigation processes and procedures, progressive discipline, and grievance processes and procedures	In Progress	The EEO Office has created a handbook, FAQ, and "roadmap" that details all; see page 3 of this report. Processes for non-EEO related complaints are less defined and will be a priority for development in 2026 for our HRBP and TELR teams, pending the completion of DHR's case management system.
Using the analysis above, conduct analysis of outcomes related to EEO and non-EEO claims.	In Progress	The EEO Office completed the implementation of an electronic Case Management System that will allow it to conduct various reports and analysis on EEO-related claims.
<b>6. Expand Metro &amp; Labor Partnership</b>		
Deepen collaboration and strategic alignment between Metro and labor partners by implementing a "Joint Civility & Respect Campaign" to help reinforce workplace conduct standards in alignment with True North Values, relevant policies, and labor agreements.	Not Started - Requires Additional Partnership	Metro is unable to move forward without appropriate discussions with appropriate labor partners. This proposal will be shared with Metro's labor team for further consideration.
<b>Equitable Pathways to Career Advancement, Starting Page 48 of the Assessment</b>		
<b>1. Sponsor &amp; Support Division Base ERGS</b>		
Develop charters for women and gender expansive employee ERG	In Progress	Metro EEO, EIB, and ERG leaders are currently meeting to develop governing documents for the divisional ERGs and other spaces that have operated under the umbrella of the WOMEN ERG.
Provide dedicated staffing/skilled facilitation for the ERGs	In Progress	ERGs are supported by the skilled and dedicated EIB team. Efforts are being made to secure additional EIB resourcing to support ERGs, including Rail, Vehicle Maintenance, and Facilities dedicating funding to expand the EIB team.

Establish and promote an Anti-Sexism Men Ally Group ERG designed to raise awareness of gender bias in the workplace and promote ally-based equity practices	In Progress	See page 21 of this Report on Men's Community of Practice.
Remove barriers to access ERGs and create standard operating procedure on how to request and attend an ERG	Complete - Existing Structures and Policies in Place	Metro and the County already have ERG-Affinity Group Policy that outlines the manager/supervisor approval process. However, the removal of procedural barriers may be an issue that requires additional education in various spaces throughout Metro, especially front-line and 2nd/3rd shift employees.
<b>2. Pipeline Entry and Advancement in Trades</b>		
Increase the number of qualified women-identifying and gender expansive applicants for trade roles	In Progress	The EEO Office, through its Program Reports, actively monitors the number of qualified women available versus the actual number employed in its workforce. Next year's report will be instructive as to where and how Metro can prioritize resourcing to achieve its EEO/AA goals.
Create more pathways for upward mobility	In Progress	Serval pathways exist and are development to increase pathways towards upward mobility for all qualified Metro employees, including Metro Apprenticeship Program, Green Jobs, and Business Transformation.
<b>3. Establish Supervision Best Practices - See "Support &amp; Training in Current Job, 3. Supervision Best Practices"</b>		
<b>4. Reduce Bias in Hiring and Promotional Process</b>		
Establish screening questions, particularly for people-manager roles, that address company in inclusion and accommodation best practices	Not Started - Requires Additional Partnership	Adding requirements to a recruitment may require partners from Human Resources and the unions if these screening questions relate to job functions and qualifications. This proposal would also require further study and research on what competencies are expected. For accommodation best practices, Metro's Disability and Leave Services team has helpful information on the Metro Toolbox.
Ensure EIB, EEO or other formal workplace equity practitioner is included in hiring panels and assist with the evaluation	Complete - Existing Structures and Policies in Place	This proposal would require a significant increase in staff trained in EIB, EEO or "other formal workplace equity partition" to ensure hiring processes. Also see the new Hiring Manager Guide in the Employee Services, Talent Acquisition section of the Metro Toolbox.
Incorporate a standard equity auditing tool or process for evaluating internal applicant advancement	Not Started - Requires Additional Research	Metro's EEO Office and Green Jobs are currently collecting information on advancement data. The data will be compared to the 2026 Program Plan for strategic planning, which may include the creation and incorporation of an auditing tool.
Provide feedback to internal applicants about the strengths and weaknesses in their application and/or interview	Complete - Existing Structures and Policies in Place	Internal applicants may always contact the Talent Acquisition professional that helped lead that recruitment process for feedback.

<b>Reduce Workplace Bias &amp; Improve Gender Equity Outcomes</b>		
<b>1. Equity Analysis</b>		
Conduct pay equity analysis and attrition rate analysis	In Progress	This analysis will be a part of Metro's 2026 EEO Program and Plan having established our 4-year base line.
<b>2. Expand &amp; Coordinated Learning and Development</b>		
Design and implement gender equity specific trainings that review relevant policies and codes of conduct and address institutional sexism and other common issues affecting women-identifying employees	In Progress	See "Support & Training in Current Job" section on page 13 of this Report.
Expand the scale of Metro's Men's Community of Practice	In Progress	See the Community of Practice section on page 21 of this Report.
Establish explicitly standards and expectations on annual number of hours each employee is entitled and expected to attend equity and conduct-related trainings	Not Started - Requires Partnership	Metro is unable to move forward without appropriate discussions with appropriate labor partners and DHR. This proposal will be shared with Metro's labor team for further consideration.
<b>4. Disability Status/Identity and Gender Identity Access &amp; Equity</b>		
Establish centralized data collection system that tracks employee access or other experiences related to disabilities and gender identity	Complete - Implementing	Metro recently completed building a custom case and data management system for EEO related complaints and disability and access-related matters. This includes a new feature in the SSAM system to track operator experiences with members of the public who target them for their gender identity/express or other protected class.
Ensuring accessible resources and education about disabilities, gender identities, civil rights, accessibility, and reasonable accommodations	Complete - Implementing	The EEO Office completed the development of Civil Rights Trainings that can be requested by any workgroup at Metro. Metro's Disability and Leave Services team also has helpful information on their Toolbox page for reasonable accommodation requests. Finally, resources have been requested to develop enhanced curriculum and training on ADA and access matters at Metro.
Conducting a comprehensive organizational culture and needs assessment to help identify solutions that results in greater equity outcomes for employees with disabilities	Not Started - Requires Additional Research	Metro recently created its first ADA Team dedicated to matters related to disability, reasonable accommodations, legal compliance, universal access, and equity. Metro still also supports its Disability and Leave Services Team for reasonable accommodation requests from employees. Conducting a comprehensive organization culture and needs assessment like this Women's Needs Assessment would require significant planning, scoping, and research to implement effectively.
<b>6. Caregiver Status/Identity Access &amp; Equity</b>		

<p>Collect demographic data about caregiver status to allow Metro to better measure the current state of roles, opportunities and workplace environment</p>	<p>Not Started - Requires Additional Research</p>	<p>As of March 2025, there is proposed legislation before the King County Council that would list "family caregiver" as a protected class in the County's antidiscrimination ordinances, see file 2025-0018. Metro will await the outcome of this proposed ordinance before taking additional steps.</p> <p>Mobility and EIB's Tareca Choi are also actively preparing to further research the needs in alignment with labor agreements.</p>
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**King County Metro Transit Department**  
**EEO Office**

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

(206) 477-9454 (TTY Relay 711)

[MetroEEO@kingcounty.gov](mailto:MetroEEO@kingcounty.gov)

# Attachment 13: Women's Needs Assessment



# Metro Transit Frontline & Women in the Trades Needs Assessment: Culture Change for/by Women

Sponsored by Metro Equal Employment Opportunity (EEO) Office &  
Metro Enterprise Employee Services

## Organizational Learning Report & Executive Summary

October 2024

**Prepared by:**

**Aline Baruch Carton-Listfeld, JD,  
Organizational Development Practitioner,**

Department of Human Resources, Career & Culture Division

In collaboration with:

**Kate Dabe, MPA,  
Internal Strategy Projects Manager,**  
Metro Organizational Health & Development Section,  
Metro's Employee Services Division



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## 1. FORWARD

### 1.1 Executive Summary

Commissioned by the Metro EEO Office and Metro Enterprise Employee Services, this quantitative and qualitative assessment reveals the top workplace improvement needs and proposed solutions of more than 200 women and gender expansive employees at Metro Transit who primarily work in the trades or in frontline public-facing and/or shift roles in Vehicle Maintenance, Rail, Facilities, Bus Operations and Marine Divisions.

In alignment with best practices for operationalizing organizational access and equity, the assessment design and process were anchored in the belief that *those who are closest to the problems are often closest to the solutions*. The report findings outline specific and actionable opportunities for Metro to improve:

1. Workplace health and safety;
2. Support and training in current job;
3. Performance management, addressing workplace bullying and other inappropriate conduct;
4. Equitable pathways to career advancement; and
5. Reduce workplace bias and improve gender equity outcomes.

The results and findings of this project will be incorporated into the 2025 Metro EEO Program Update and announced to all Metro employees. The EEO Office has indicated that it is expected that the findings will be used to inform budget/resourcing decisions and the strategic alignment and prioritization of other Metro initiatives aimed at advancing gender and other equity in the workplace.

### 1.2 Context

According to the King County Metro Strategic Plan for Public Transportation 2021-2031<sup>1</sup>, King County expects more than 870,000 more people and 680,000 new jobs by 2050.<sup>2</sup> King County is also becoming more diverse. Despite having some of the most prosperous communities in the world, deeply entrenched social, economic, and environmental inequities hold back those within affected communities and threaten King County's collective prosperity.

The King County Metro Transit Department (MTD) is expanding its workforce significantly to meet the needs of the King County Metro Strategic Plan. This rapid growth and change have created a need to improve strategic alignment with the King County True North and Values. To this end, the department is investing time and

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<sup>1</sup> King County Metro Strategic Plan for Public Transportation 2021-2031: [attachment a \(kingcounty.gov\)](#)

<sup>2</sup> Puget Sound Regional Council VISION 2050 growth projections (technically 872,000 people, 682,000 jobs from 2017-2050)

resources to increase organizational health and effectiveness to support employees responsible for serving the public.

### 1.3 Project History & Intent

In 2022, the Equal Employment Opportunity (EEO) Program of Metro King County conducted an extensive investigation in response to complaints filed by employees alleging gender and sex discrimination and the presence of a hostile work environment in the department's Vehicle Maintenance (VM) Division. The investigation resulted in a detailed report<sup>3</sup> (VM report) with findings and recommendations published in March 2023. In addition to sharing the findings, the report recommended steps that Metro should take to help improve gender equity.

One recommendation in the VM report, among many, includes building the capacity of women's affinity/employee resource groups to meet their mission of supporting women at Metro, specifically focusing this growth on supporting women in the trades. While the VM report addressed the challenges in VM, it also revealed opportunities to better hear from and understand the needs and experiences of other frontline employees and employees in the trades who may experience the greatest barriers to access, equity and justice at Metro Transit.

In the spirit of supporting all employees and in alignment with the report recommendations, the purpose of this assessment was to evaluate the needs of Metro employees who identify as women and gender expansive. The intent was to not only better understand their day-to-day workplace experiences but to help reveal sustainable, institutional solutions resulting in measurably improved workplace experiences for all Metro employees.

This assessment was informed by the premise<sup>4</sup> that when employees who may be furthest from access, equity and justice feel supported by our workplace systems and culture, then all employees at Metro will benefit. As such, this assessment intentionally focused on hearing from women of color and other women and gender expansive employees in the trades and/or customer/public facing roles.

The EEO Office engaged the professional services of Aline Baruch Carton-Listfeld to conduct a comprehensive assessment of the needs of frontline women and women in the trades in response to the VM Report. Aline is an organization development practitioner, certified leadership coach, and change management practitioner with the Department of Human Resources' (DHR) Career and Culture Division. Among its key functions, DHR's Career and Culture Division deploys experts in organizational development strategies to departments throughout the County to advise and develop practices that promote a healthy and productive workplace.

Through the earlier process that produced the VM Report, in close partnership with VM Division leadership, the Metro EEO Office made intentional efforts to ensure the voices

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<sup>3</sup> [2023-eeo-program-report-update.pdf \(kingcounty.gov\)](#)

<sup>4</sup> [Targeted Universalism | Othering & Belonging Institute \(berkeley.edu\)](#)

of women in VM were heard and qualitative data was collected to document the realities of their experiences. In this current assessment, equally concerted efforts were made to ensure the documentation of the solutions and ideas shared by the women in Metro's workforce, with a more expansive focus in the VM, Rail, Facilities, Bus Operations, and Marine Divisions.

It is expected and it has been reported to participants that the results and findings of this project will be incorporated into the 2025 Metro EEO Program Update and announced to all Metro employees.

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*This needs assessment is the next step in creating a path towards integrated solutions that yield tangible and measurable results to improve the work lives of all women and gender expansive employees at Metro.*

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#### 1.4 Project Members

- Aline Baruch Carton-Listfjeld, Organizational Development (OD) Practitioner from King County's Career & Culture Division (CCD), Department of Human Resources (DHR), who served as OD practitioner (internal consultant). The CCD mission is to transform the organization to be a welcoming community where every person can thrive by cultivating health through a values-aligned culture. The Organizational Development (OD) team partners with clients and empowers teams to live into creative workplace solutions that expand equity and belonging, aligning our workforce to the True North and Values.
- Kate Dabe, Internal Strategy Projects Manager, Organizational Health & Development Section of Metro's Employee Services Division, who served as lead project manager and provided critical deployment design, communications, statistical, copy-editing, and research assistance.
- Chris Bhang, Metro EEO Officer, who serves as project sponsor.
- Kendall LeVan Hodson, Interim Assistant General Manager for Metro Employee Services, and, later, Metro General Manager Michelle Allison, who served as executive sponsors.
- Janine Anzalota, Organizational Health & Development Section Manager of Metro's Employee Services Division, who served as strategic advisor and stepped in as substitute listening session facilitator as needed.
- Members of the Guidance & Action Team, who served as a Metro-based interdisciplinary workgroup and included EIB Managers, HR Business Partners, Gender & Equity Program Manager, EEO Office staff, Employee Services staff, and select division leaders to help inform our questions, conduct outreach, guide and support the project's work.

## 1.5 Gratitude & Acknowledgements

- Women of Metro Empowerment Network (WOMEN) Metro-wide Employee Resource Group (ERG) who provided critical leadership in initiating the deployment of this assessment.
- Members of the Guidance & Action Team who provided invaluable strategic, interdisciplinary insights and guidance as well as communications and outreach.
- EEO Office leadership and staff who provided engaged and steadfast support in advancing our efforts.
- Enterprise Employee Services leadership and staff who were accessible, communicative and active in various administrative, relationship-building, outreach and research tasks.
- EIB Managers and other ESJ and Wellness program managers who provided valuable support, data and insights in the early stages of our deployment.
- HR Business Partners who shared division-based HR strategic insights.
- Transit Employee Labor Relations staff who provided invaluable insights on data collection and tracking systems.
- Assistant General Manager of Partnerships and Strategies, who provided feedback at a pivot point in our process helping move our work forward.
- Division leaders who supported our project by partnering with us to reduce barriers and implement best strategies to access and reach prospective participants.
- Bus Operations' Speak Listen Communicate committee and ambassadors, who actively partnered with us to deploy peer ambassadors to conduct outreach and encourage colleagues to participate.
- All the people-leaders who encouraged their direct reports and other colleagues to participate and removed barriers to their participation.
- Bus Operations' internal communications team, who provided critical partnership in behind-the-scenes scheduling, communications and coordination of listening sessions.
- ATU 587 leadership who affirmed their support early in our process.
- Fellow OD Practitioner and OD/ADR Manager for their support in conducting listening sessions with bus operators.
- King County Black Women's Experience Project leaders who provided valuable insights on alignment in respective findings.
- All of the leaders, facilitators and participants of the following employee affinity groups who so generously created space for us to connect with them:
  - Metro's Transgender, Non-binary and Gender Expansive Advisory Panel;
  - Building Up: Community of Practice for Metro Women Leaders group;
  - Rail Division's Women in Rail group;
  - Facilities Division's Women RISE group; and
  - Vehicle Maintenance Division's Community Connections group.

**Most importantly, we thank all of the employees who bravely shared, participated, and took the leap of faith that this effort will help yield concrete, measurable improvements towards greater access, equity and gender justice at Metro.**

## 1.6 OD Consulting Approach & Process

Helping people and teams work better together in the service of access, equity and social justice is at the heart of the approach used in this assessment. Anchored in community organizing principles, our methodology is rooted in the belief that *the people who are closest to the problems are often closest to the solutions*. The consultant role is to both help reveal strengths and challenges, and also facilitate a collaborative process for longer-term team capacity-building, resulting in more joyful, effective, equitable leaders, teams, and workplace systems.

This approach is also centered on co-designing with our clients a values-aligned culture which includes using the following guideposts and tools:

- King County True North and Values<sup>5</sup>
- Equity, Racial & Social Justice values and strategic plan<sup>6</sup>
- King County Best Run Government practices<sup>7</sup>
- Metro's anti-racist pro-equity actions<sup>8</sup>
- 2021-31 Metro Strategic Plan<sup>9</sup>

### 1.6.a. Professionalism Standards

The standards of ethics, professionalism and best practices for this assessment are guided by the Organizational Development Code of Ethics<sup>10</sup>, the Global OD Competency Framework,<sup>11</sup> as well as the American Association for Public Opinion Research Code of Professional Ethics and Practices<sup>12</sup>. As such and in compliance with King County policies, great care and attention is taken to:

- Mitigate any real or perceived bias;
- Respect the privacy and preserve confidentiality of participants;
- Maintain survey respondent anonymity; and
- Ensure data integrity.

### 1.6.b. Process

There are generally five core phases for our OD work:

1. Organizational learning/assessment;
2. Analysis, findings, and report with preliminary recommendations;
3. Collaborative solution design;
4. Implementation; and
5. Monitoring progress.

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<sup>5</sup> [True North and Values - King County](#)

<sup>6</sup> [Equity and Social Justice Strategic Plan - King County](#)

<sup>7</sup> [Working together to become a Best-Run Government \(sharepoint.com\)](#)

<sup>8</sup> [Becoming a pro-equity, anti-racist organization \(sharepoint.com\)](#)

<sup>9</sup> 2021-31 Metro Transit Strategic Plan [attachment a \(kingcounty.gov\)](#). See pages 63-66.

<sup>10</sup> [PNODN - Code of Ethics](#)

<sup>11</sup> [Global OD Competency Framework - OD Network](#)

<sup>12</sup> [Standards and Ethics - AAPOR](#)

This assessment is currently limited to the first two phases only.

Consulting projects can range between 6-24 months depending on team size, goals, needs and strategies. It is also an iterative process that allows space for flexibility and changing needs.

### 1.7 Purpose

The purpose of this organizational learning process phase was to:

- Gain understanding of current state of the workplace for women-identifying and gender expansive employees primarily who work in the trades, are frontline or are customer-facing;
- Provide a space for employees to voice their lived experience, ideas, concerns, and needs;
- Identify opportunities for organizational improvement;
- Offer an opportunity for those who may be furthest from access, equity and justice at Metro Transit to provide ideas for concrete solutions for day-to-day challenges and ultimately have some of those ideas and solutions be put into action and deliver results; and
- Provide Metro leaders and labor partners with reliable data to support their efforts in continuing to improve workplace access and equity practices for all employees.

### 1.8 Organizational Learning Methodology & this Report

There are 11 divisions within Metro Transit. This report presents key findings of an assessment, analysis, and recommendations from the organizational learning process conducted between April 2024-October 2024 of five operations-based divisions in Metro Transit:

1. Vehicle Maintenance;
2. Rail;
3. Facilities;
4. Bus Operations; and
5. Marine.

Respondents primarily included individual contributors and people leaders with frontline, trades, public/customer facing and/or operations-based roles in daytime and graveyard shifts. (Please see Appendix 2: Survey Data for more details.) Responses were compiled on spreadsheets for further analysis, using a holistic approach to highlight patterns, themes, and nuances in the collected data and to maintain the anonymity of the respondents.

Research subjects included:

- 182 respondents of a 14-question anonymous online survey which included ranking, Likert-scale, multiple choice, and open-ended questions.

- 116 participants in 17 ‘brave space’ listening sessions, also referred to as focus groups, where participants were asked and agreed to confidentiality. These sessions ranged from 5-19 participants. Most participants completed the online survey during the session. No listening sessions were conducted in the Marine Division due to its small size (instead, we relied on the online survey and individual interviews). We conducted two types of listening sessions:
  1. Division-Based Affinity Group: VM, Rail and Facilities divisions currently have affinity groups for women-identifying and gender expansive employees. We were able to incorporate listening sessions for this assessment in existing group meeting time. Attendance included a mix of individual contributors and people managers.
  2. Specially Designed Coordinated Groups: Currently, no division-based affinity group for women-identifying employees exists in Bus Operations. With the help of the Speak Listen Communicate (SLC) committee and the internal Bus Operations communications team, we were able to host five listening sessions with bus operators. No people managers attended these sessions.
- 40 confidential individual interviews.
- Findings from the June 2024 Rail Division’s Facilities Section organizational learnings report.

Constraints:

- Race & Ethnicity: The race and ethnicity identity categories used in the online assessment’s demographic questionnaire reflected the current King County demographic data collection practices and categories that may not reflect the multiple, nuanced and complex identities that people have.
- Disability: The online assessment’s demographic questionnaire did not include disability status and/or identity.
- Gender & Gender Identity: Inclusion of women-identifying and gender expansive language such as trans, nonbinary, and “assigned female at birth” (AFAB) created some confusion and/or concern for some respondents in both outreach and communication materials as well as in the online assessment’s demographic questionnaire. We regret that this may have negatively impacted some respondents’ experience of inclusion and belonging and/or choice of whether to participate in this project.
- Parent and/or Caregiver: The online survey’s demographic questionnaire did not include questions about parent/caregiver identity/status. This impacts the validity of the statistical significance of the results on childcare needs-related questions.
- Metro’s Unique Partnership with Rail Division and Sound Transit: This assessment did not include Sound Transit partners. However, the unique partnership with Sound Transit underscores the importance of identifying the complex sources of challenges reported by respondents. Opportunities exist to clarify roles, responsibilities, and decision-making between Metro and Sound Transit in a variety of systems and processes that impact employee workplace

experiences in the Rail Division. This will help in effectively designing and delivering customized collaborative solutions.

## 2. CURRENT STATE: SUMMARY OF FINDINGS

### 2.1 Introduction

The following summarizes the current state of Metro as it is experienced by respondents. It begins with a summary of the respondents themselves. It then provides high-level strengths followed by areas of opportunity for improvement. Each category first includes quantitative findings from the online survey where available, followed by disaggregated analysis when anonymity could be preserved, and finally, qualitative findings to help complete the analysis.

Following the current state, the next section, 3.0 Measuring Progress Towards Organizational Culture Change, introduces three frameworks for measuring progress towards organizational culture change. Findings regarding the desired future state that respondents reported are included in 4.0 Desired Future State section of the report.

For this analysis, the terms “women” and “all women” include both cisgender women and transgender women. Twelve employees self-identified as transgender, non-binary, intersexual, or otherwise not cisgender. To protect their anonymity, this group is not disaggregated further by race/ethnicity, supervisory role, or work environment. While findings for this group are reported throughout the assessment, please see Appendix 2: Survey Data for further analysis of findings of the reported experiences of gender expansive employees.

In addition, due to the relatively small size of the Marine division, disaggregation of this division’s results are excluded to preserve the anonymity of respondents.

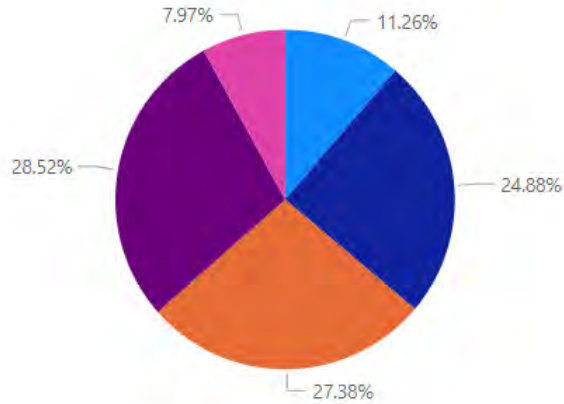
***This body of work is an organizational culture assessment. It is not part of a fact finding EEO investigation.***

## 2.2 About the Demographics of Metro's Divisions<sup>13</sup>

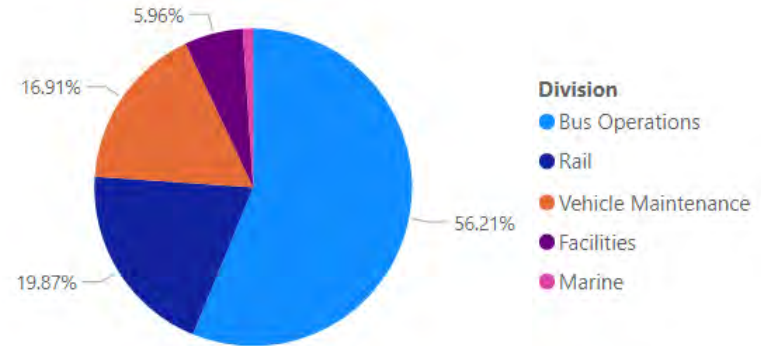
Figure 1. Demographics of Operational Divisions as of 9/3/2024, N=4,832.

### Age Group

- 16 - 34
- 35 - 44
- 45 - 54
- 55 - 64
- 65 +

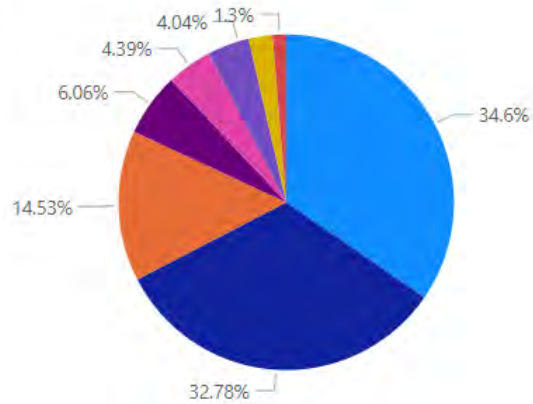


### Division

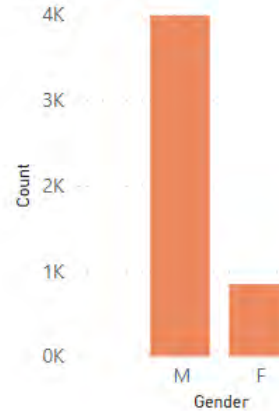


### Race/Ethnicity Breakdown

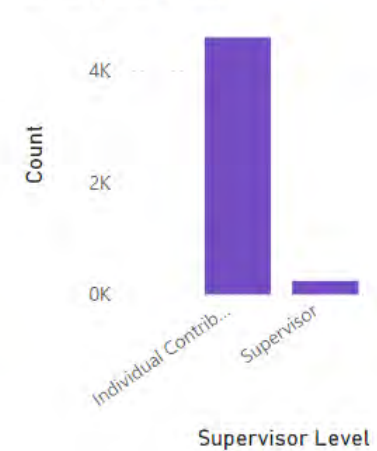
- White
- Black/African Ameri...
- Asian
- Hispanic/Latino
- Two or More
- Not Specified
- Pacific Islander
- Am. Indian/Alaska ...



### Gender



### Supervisor Level

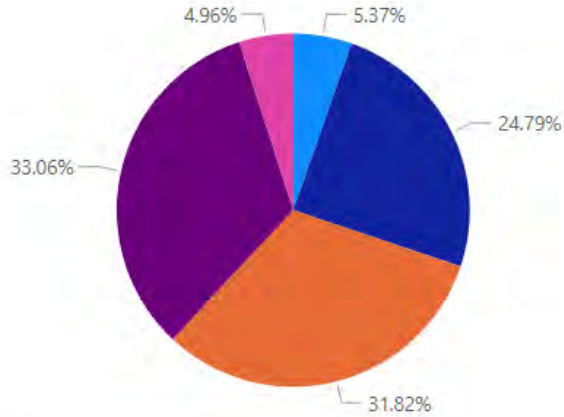


<sup>13</sup> [Equitable Workforce - Power BI \(powerbigov.us\)](https://powerbigov.us/Equitable-Workforce-Demographics) Demographics - Power BI (powerbigov.us). Note: Intended for use by Metro staff for continuous improvement purposes. Data is not fully processed and may contain errors.

Figure 2. Demographics of Supervisors (People Managers) in Operational Divisions as of 9/3/2024, N=242.

Age Group

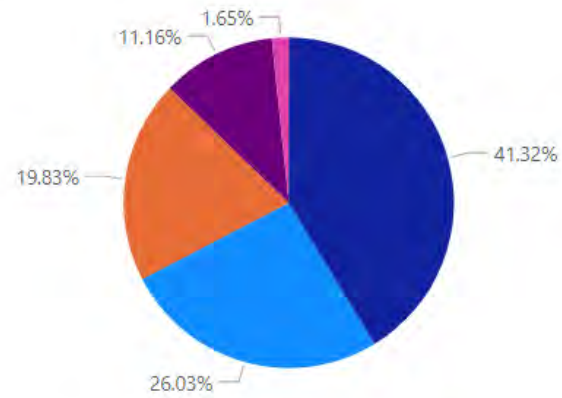
- 16 - 34
- 35 - 44
- 45 - 54
- 55 - 64
- 65 +



Division

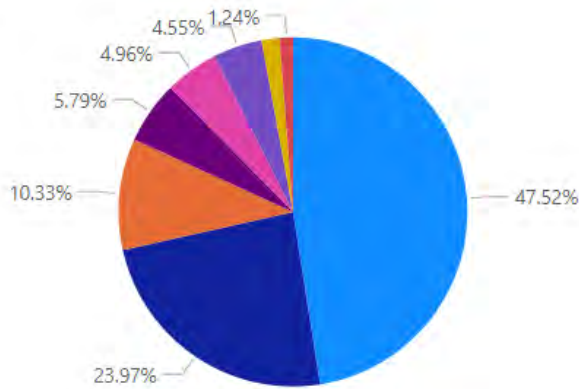
Division

- Rail
- Bus Operations
- Vehicle Maintenance
- Facilities
- Marine

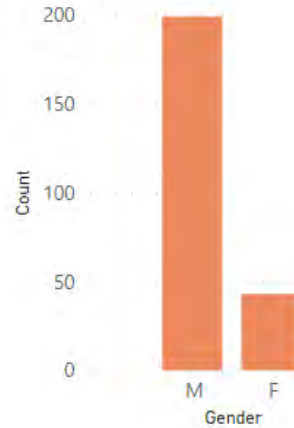


Race/Ethnicity Breakdown

- White
- Black/African Ameri...
- Asian
- Hispanic/Latino
- Two or More
- Not Specified
- Pacific Islander
- Am. Indian/Alaska ...



Gender



Supervisor Level

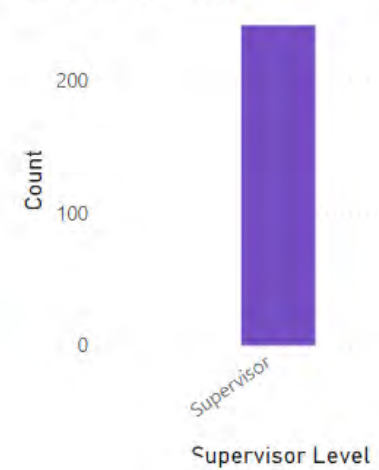
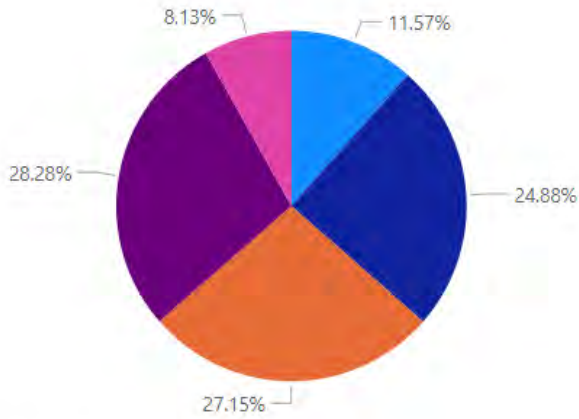


Figure 3. Demographics of Individual Contributors in Operational Divisions as of 9/3/2024, N=4,590.

Age Group

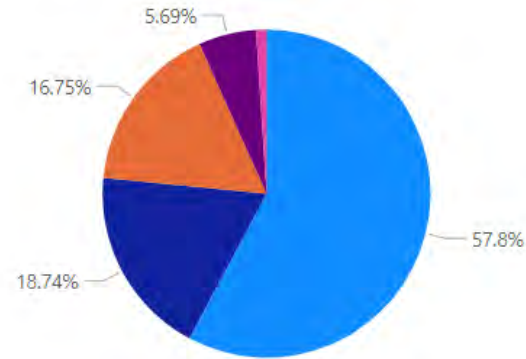
- 16 - 34
- 35 - 44
- 45 - 54
- 55 - 64
- 65 +



Division

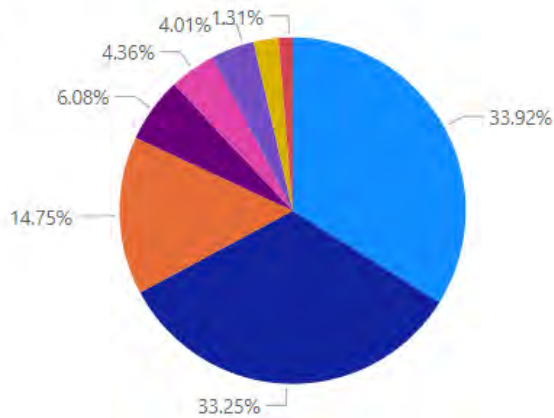
Division

- Bus Operations
- Rail
- Vehicle Maintenance
- Facilities
- Marine

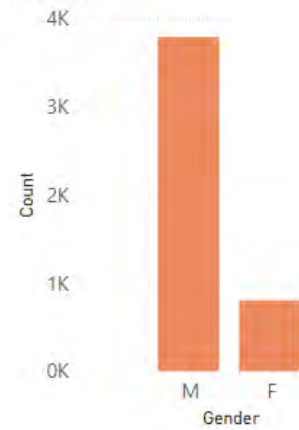


Race/Ethnicity Breakdown

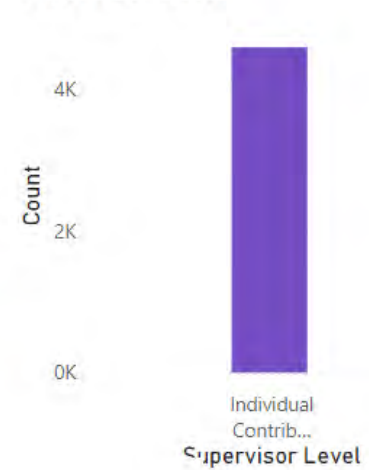
- White
- Black/African Ameri...
- Asian
- Hispanic/Latino
- Two or More
- Not Specified
- Pacific Islander
- Am. Indian/Alaska ...



Gender



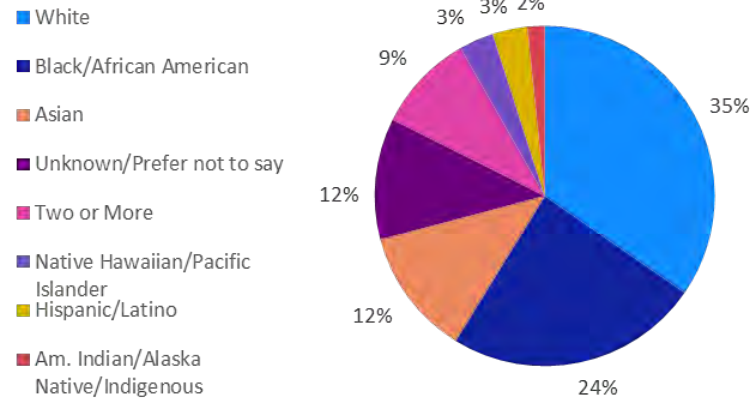
Supervisor Level



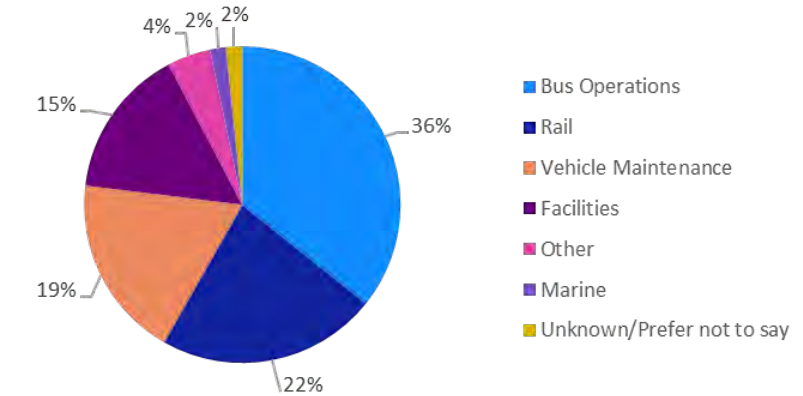
## 2.3 About the Respondents

Figure 4. Demographics of Survey Respondents, N=182.

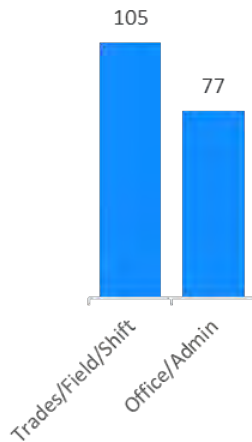
### Race/Ethnicity Breakdown



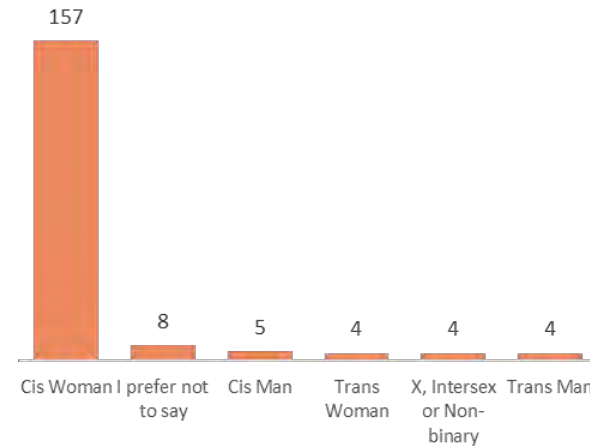
### Division



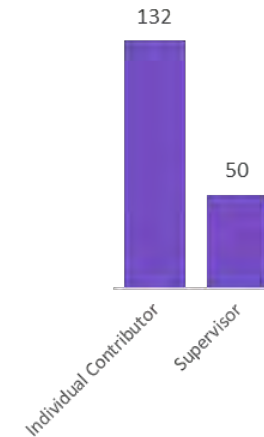
### Type of Work



### Gender



### Supervisor Level



For this assessment, women-identifying and gender expansive people were identified as survey respondents. They were also offered more inclusive responses to describe their gender identity than are currently offered to employees generally (see 2.2. About the Demographics of Metro’s Divisions.). As expected, most respondents (93%) were women or gender

expansive people (N=169). The survey had a lower proportion of Bus Operations employees (36%) compared to their proportion among operational division employees generally (57.8%). Supervisors comprise 38% of survey respondents but only 5% of operational division employees. There were fewer respondents proportionally than are represented in operational division employees who identify as Hispanic/Latino (3% vs. 6.06%), Asian (12% vs. 14.53%), and Black (24% vs. 32.78%). Conversely, there were higher representations of the “Unknown/Prefer not to say” (12% vs. 4.04%) and “Two or more races” (9% vs. 4.39%) groups.

## 2.4 Strengths

The following are some organizational strengths cited by respondents:



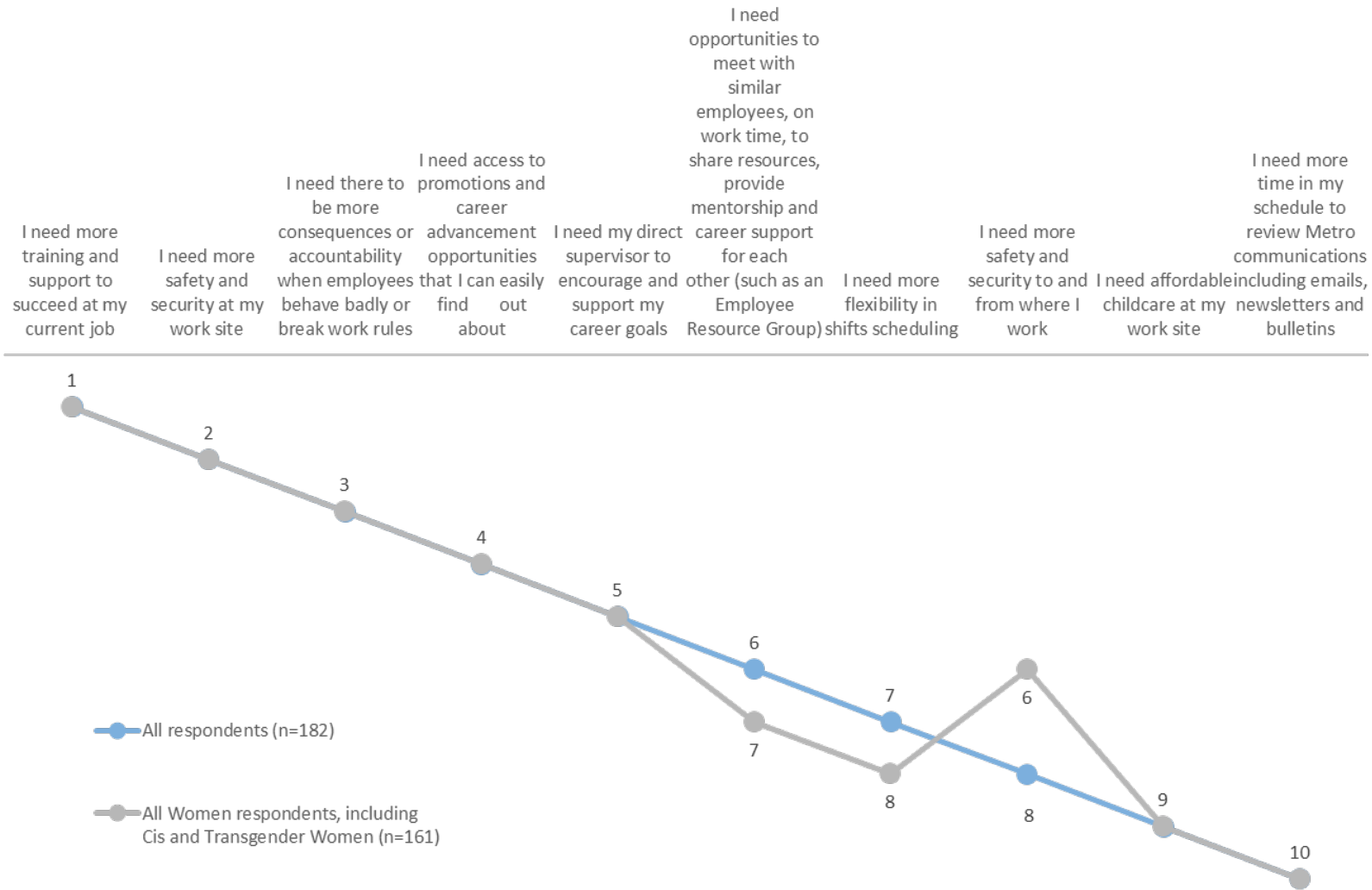
Recognizing and acknowledging strengths helps to:

1. build on what is already going well;
2. celebrate successes and capabilities;
3. generate energy; and
4. increase employee engagement.

While the organizational learning process was not explicitly designed to assess organizational strengths, many respondents reported a variety of positive feelings or experiences working at Metro. Some of these include explicit efforts at Metro to improve organizational culture around issues of racial and gender equity, as well as resilience through organizational and staff changes in the post-pandemic landscape. The most cited strength by respondents is Metro's comprehensive employee benefits. Finally, many respondents familiar with Metro's leadership changes shared feelings of hope and cautious optimism with the more recent appointment of the new General Manager to lead and deliver Metro's vision for a more equitable workplace.

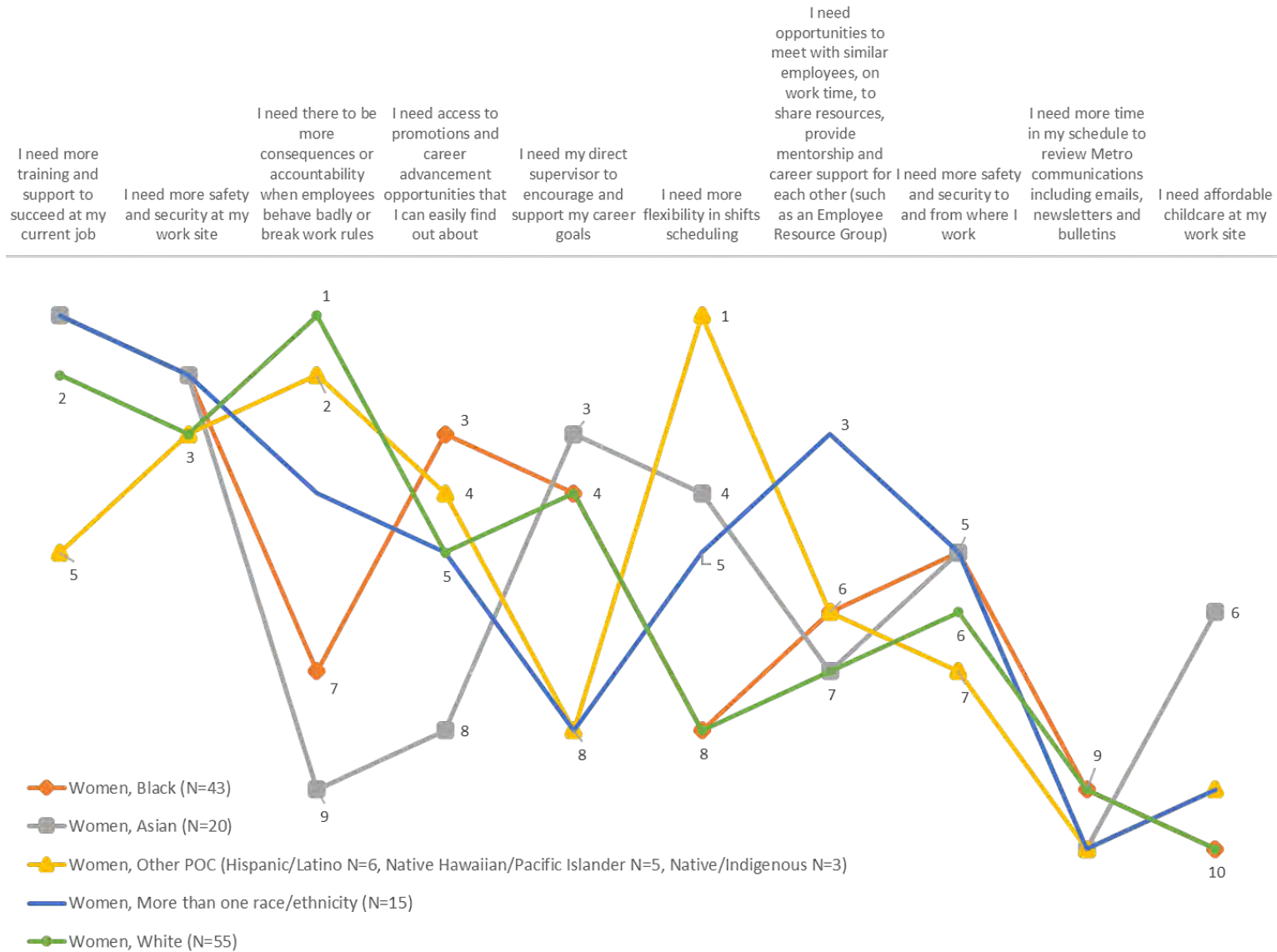
## 2.5 Areas of Opportunity for Improvement

Figure 5. Ranking of Top Needs by All Respondents (N=182) and All Women (N=161).



Most women at Metro prioritize more training and support to succeed at their current job.

Figure 6. Ranking of Top Needs by All Women (N=161) by Race/Ethnicity.<sup>14</sup>

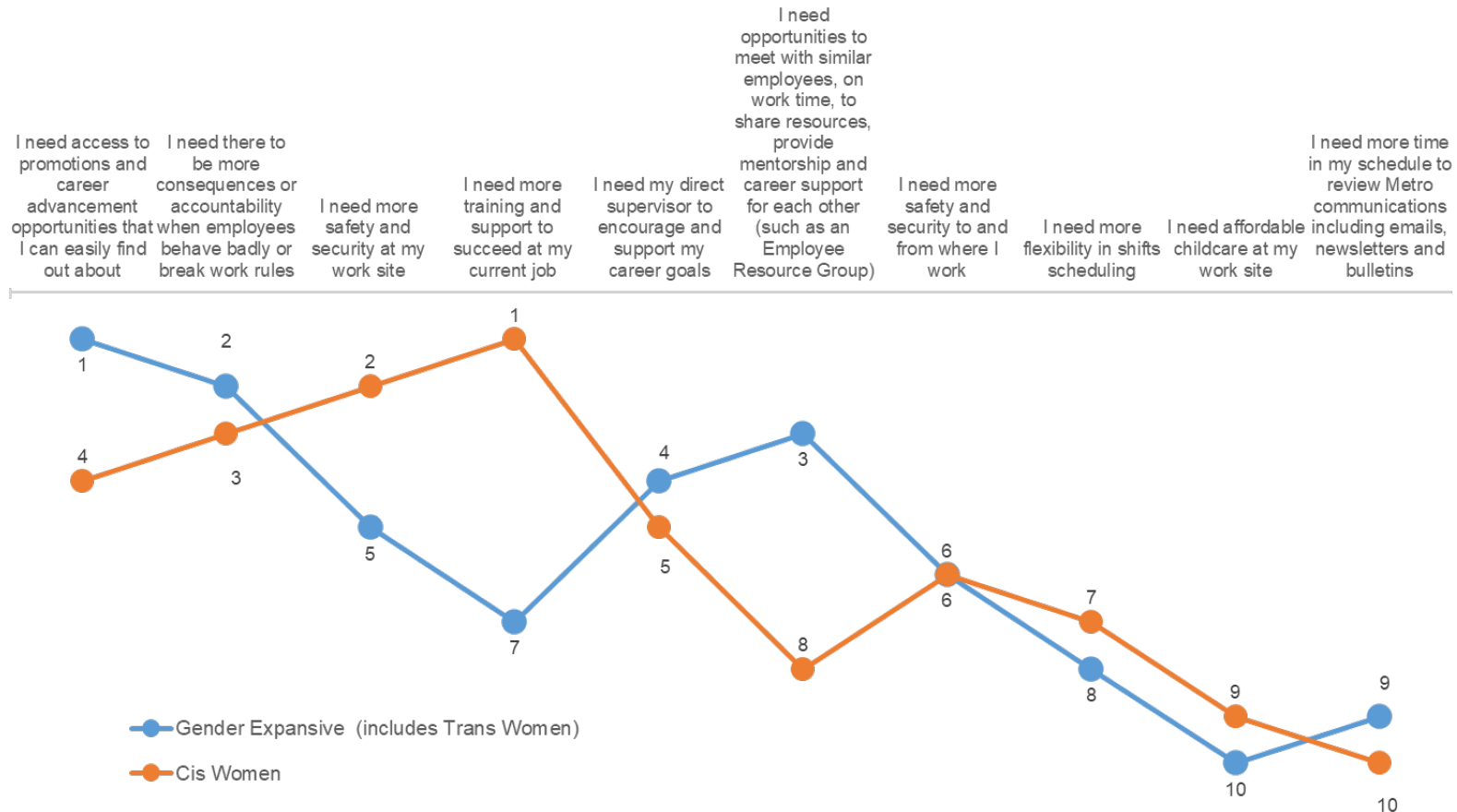


Black women prioritize access to promotions and career advancement opportunities more than other women of color or White women respondents. White women prioritize accountability and consequences more highly than other women.

<sup>14</sup> To preserve anonymity, groups with a small number of respondents were aggregated to preserve anonymity.

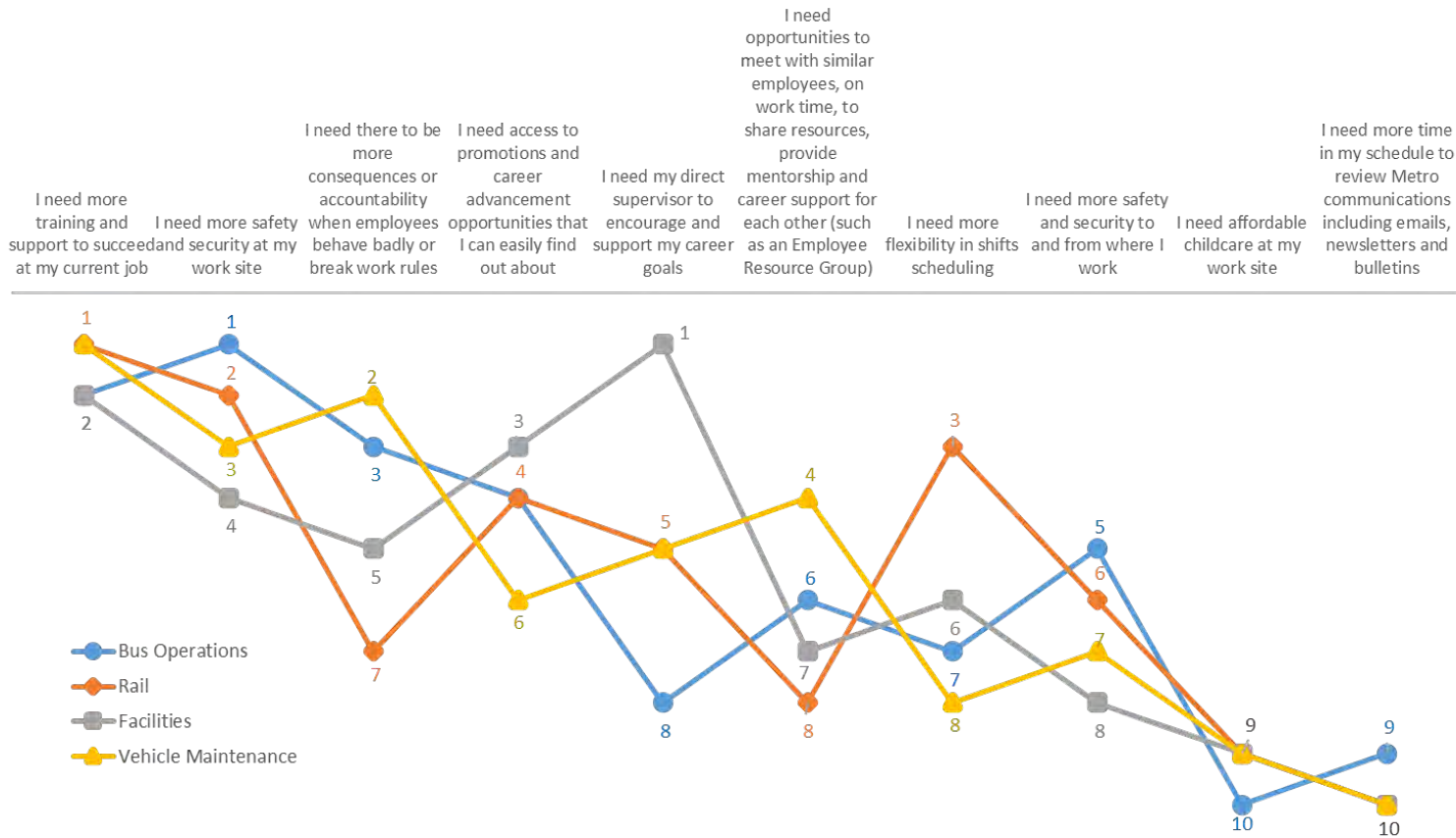
Women in the trades prioritize safety at the worksite more highly than those in the office environment, although it is a priority for both. (See Appendix 2: Survey Data for detailed disaggregated analysis.)

Figure 7. Ranking of Top Needs by Gender Expansive People (N=12) and Cisgender Women (N=157).



Gender expansive employees value access to promotions and career advancement more highly, ranking it in first place, compared to cisgender women who rank it fourth. The two most highly ranked needs by cisgender women—more training and support to succeed at my current job and more safety and security at my work site—are not as highly prioritized by gender expansive employees. Gender expansive employees prioritize opportunities such as Employee Resource Groups (ERGs) much more highly, at third, than cisgender women, who rank it eighth.

Figure 8. Ranking of Top Needs by All Women (N=154) by Operational Division.



A large majority of women in all divisions prioritize training and support in their current job (1,1,2,2). Women in Facilities prioritize encouragement and support from their direct supervisors (1) more highly than other divisions (5,5,8). Women in Bus Operations and Rail prioritize safety at their work site more highly (1,2), although it is a priority in all divisions (3,4). Women in Rail prioritize flexibility in shifts scheduling (3) more highly than other divisions (6,7,8). Women in Vehicle Maintenance (2) and Bus Operations (3) prioritize consequences or accountability more highly than those in Rail (7) and Facilities (5).

## 2.6 High-Priority Areas of Opportunity

The following are the top five themes that emerged during this learning process that reveal solutions for Metro Transit. Many of the experiences and topics raised by respondents underscore how these themes are closely interrelated.

**Statements are based on trends and do not represent the input from 100% of respondents in this assessment and learning process.**



*"I want you close your eyes, and imagine a day and life as a woman transit operator. Not only am I a woman, I am a Black woman. The day to day racial slurs I have to endure, the sexual harassment, harassment, and hostile, sometimes violent behavior I am subjected to by primarily men riders. Imagine being subjected to the same behavior inside the company as well. The discrimination I face because I am a woman, and the men I work with are bullies who stray the lines of professionalism any time they please. Whether in leadership positions, or a transit operator imagine being constantly exposed to such an environment, while being upheld to a certain level of productivity. Drug epidemics, homeless epidemic's, are heavily impacting both me as a professional, and the communities I serve. I am left dealing with unhinged individuals daily that constantly wreak havoc while I'm trying to operate the bus. This can be very scary as a woman. It takes a toll on you. When No one should ever have to worry about being attacked at work on a daily basis. Prior attacks have caused so much anxiety, and PTSD to the point where it starts to affect your work performance. If we discontinued [paper] transfers, start addressing the fare without creating conflict of course. There has to be a system in place to keep metro transit free of problematic non-destinational riders. Co- workers shouldn't add to the stress by retaliating, harassing, and oppressing you as well. Especially, male employees. I Love working for Metro, I feed my family with this career, but after a while all the workplace hostility takes a severe toll on you."*

### 2.6.a. Workplace Health & Safety

“Safety” was not defined in the online survey. As reported by respondents during listening sessions and interviews, for some respondents, “safety” includes psychological or interaction safety and emotional wellbeing, whereas for other respondents, “safety” is defined as physical safety only or a combination of both psychological and physical safety. A holistic analysis of the quantitative and qualitative findings reveals specific areas of opportunity for both.

For this analysis, the findings where known physical safety issues are the focus are included in this section, 2.6.a. Workplace Health & Safety. Known psychological and interaction safety issues are addressed in 2.6.c. Performance Management, Addressing Workplace Bullying & Other Inappropriate Conduct.

#### Quantitative Findings

When answering the choice ranking question, “Which of the following would most improve your experience working at Metro Transit? Please rank where 1 is most important and 10 is least important,” on average, respondents ranked more safety and security at their worksite as a second highest need. Similarly, on average, respondents ranked more safety and security to and from their worksite as their sixth highest need. (Please see Figure 5 and Appendix 2: Survey Data for more detailed quantitative rankings results.)

Fewer women who are individual contributors feel safe in the trades (46%) than in the office environment (65%). Supervisors are more likely (68%) than individual contributors (49%) to feel safe at Metro. Black women are less likely than White women (44% vs. 58%) to feel safe. (See Figure 15 in Appendix 2: Survey Data.)

Gender expansive respondents were less likely to feel safe at work (8%) than cisgender women (21%). The majority of both groups did not feel safe (58%, 54%). (See Figure 20.)

Women in the Facilities and Vehicle Maintenance divisions agreed they felt safe at a much higher rate than those in the Bus Operations and Rail divisions. Fewer women in Bus Operations feel comfortable speaking up (17%) than in other divisions (60%, 69%, 76%). (See Figure 25.)

#### Qualitative Findings

*“I have been here for 5 years, and we keep talking about this and bringing it to our supervisors. I do all the origami reports, reports for biohazards, and security issues. What’s the point if nothing is being done in response to our reporting?”*

Respondents with customer/public-facing roles reported that security personnel have no power to physically remove members of the public who engage in inappropriate or unsafe conduct. In some instances, security personnel have allegedly contributed to the safety concern through unreasonably slow response times, disengagement, incompetence, or posing a threat themselves.

Some respondents who worked alone on the night shifts reported that they often feel unsafe, fearful, and have been threatened or assaulted. In addition, some reported that they routinely deal with poor air quality, used drug paraphernalia, and bodily excrement. These conditions compromise their ability to do their jobs and work safely.

When there are incidents, many reported that there are too many layers of bureaucracy to get through to address an urgent safety concern. In

Bus Operations, many respondents reported that first-line supervisors are often slow to respond, rarely offer support when they do arrive, and are quick to find fault with operators rather than coach for improved performance.

Sometimes, there are also language barriers creating communication gaps and misunderstandings about the security need or level of threat.

Customer/public-facing roles often deal with extremely volatile situations involving substance use, mental illness, and violence and are not getting the support or safety they need. Bus operators often rely on or trust that passengers or other members of the public will call 9-1-1 because they are forbidden from doing so or otherwise face disciplinary action. Some also bring “tools” whose primary function is permitted but could help them protect themselves in a crisis, since bringing protective weapons such as mace or tasers is forbidden.

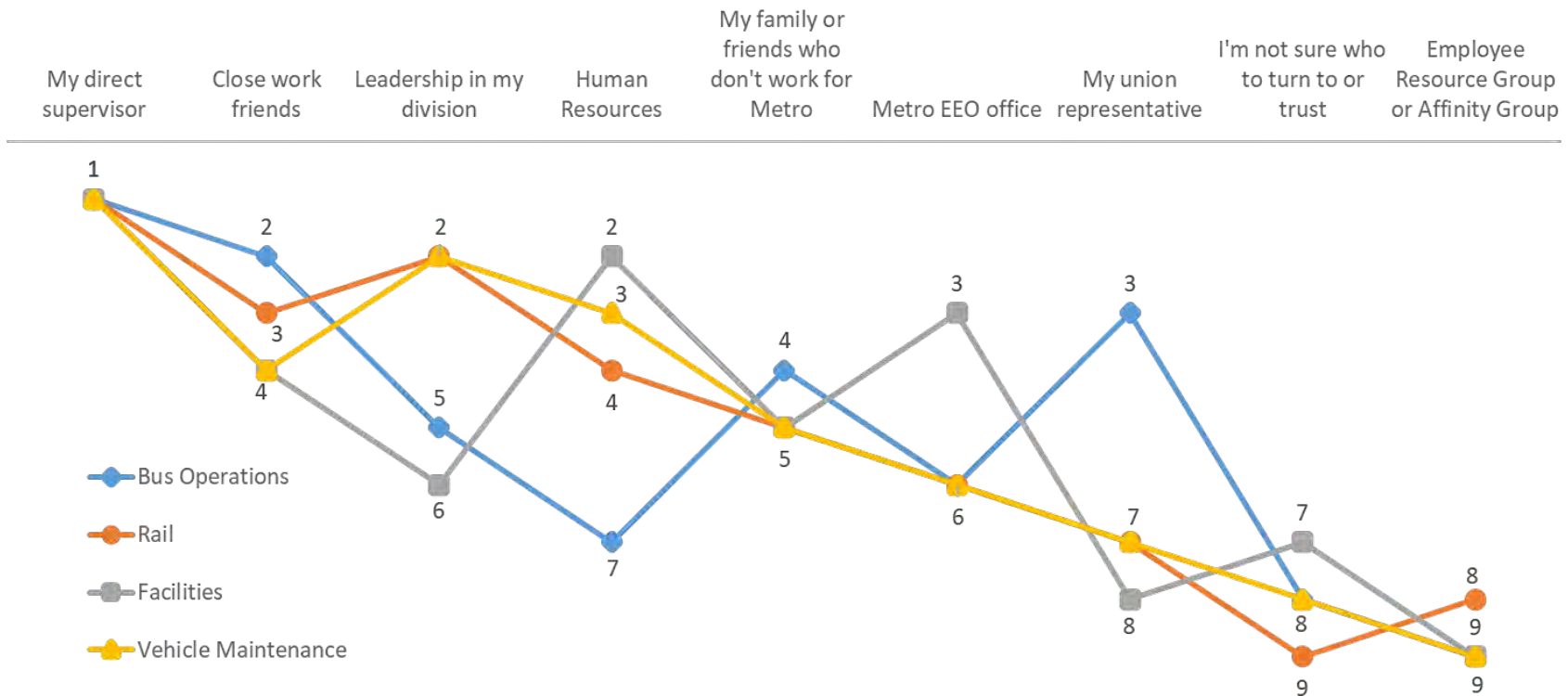
*“Driving the bus as a woman at night is a nightmare. I intentionally dress and appear as a man to have safer/better work days. When passengers think I’m a man I don’t get called a bitch, people aren’t combative and I feel safer. I just want to feel safe behind the wheel if I’m going to be driving at night. A year ago a man, that knew I was a woman, tried to assault [me] while driving the []. I pushed the emergency button with my foot. The man got off the bus because I was able to prevent him from reaching me. The supervisor who answered the call said there was nothing he could do. He didn’t ask me if I was okay, if I was able to continue, he didn’t send a supervisor over to check on me NOTHING. I filled out the report and NOTHING was done. My base chief didn’t check on me. NO ONE CARED!! Everyone acted as if it [was] a part of my job. After that happened I knew I was just another number.”*

2.6.b. Support & Training in Current Job

**Quantitative Findings**

Answering the choice ranking question, “Which of the following would most improve your experience working at Metro Transit? Please rank where 1 is most important and 10 is least important,” respondents ranked on average that they needed more training and support to succeed at current job highest (average ranking of 1). Similarly, respondents ranked on average that their fifth highest need (average ranking of 5) was having their direct supervisor to encourage and support their career goals. (Please see Appendix 2: Survey Data for complete quantitative results of these rankings.)

Figure 9. Women’s ranking of those trusted at work by operational division, N=154.



Women in all divisions highly trust or turn to their direct supervisor for help at work (1,1,1,1). Women in Bus Operations rank their union representative more highly (3) than other divisions (7,7,8) and rank Human Resources less highly (7) than other divisions (2,3,4). Women in Facilities trust the Metro EEO Office more highly (3) than other divisions (6,6,6). Women in Rail (2) and Vehicle Maintenance (2) rank their trust in their division leadership more highly than those in Bus Operations (5) and Facilities (6).

Even when disaggregated, all groups trusted their direct supervisor over other options when answering the question, “Who do you trust or turn to help you solve a work concern or problem?” Individual contributors in the trades, field, or on shift ranked their union representative more highly than other groups. Black women ranked the Metro EEO Office more highly than other groups. White women ranked Human Resources lower than Black women or other women of color. (See Figures 19a and 19b.)

Gender expansive employees and cisgender women align on how they prioritize their top three choices for who to trust or turn to: direct supervisor, close work friends, and division leadership. Consistently, gender expansive employees value ERGs higher (fourth) than cisgender women, who rank it eighth. (See Figure 24.)

## Qualitative

While respondents report a high degree of trust with their direct supervisor when there is a concern or problem, a majority of respondents in trades or shift work reported not getting adequate training, resources, and/or support to succeed at their current job.

- Inconsistent, non-standard and often insufficient training or onboarding.
- Double/inequitable standards on training and support that negatively impact employees who hold different social identities than their supervisors.
- Training and onboarding often rely on employees with greater seniority, usually men, who may or may not have interest in training, developing or otherwise supporting another employee, especially one who may appear different from them.
- In some instances, respondents report being completely left out of training opportunities in contrast to what they perceive their male counterparts access.

*“Feeling like there is a double standard between male and female workers. This should be addressed and standardized training [offered] across the board for new hires.”*

*“We are completely forgotten. I am not given the same equal tools as my male coworkers to perform certain tasks. I asked for certain computer access to perform my job as a [ ], and I was not granted full computer access as my male workers were.”*

### *2.6.c. Performance Management, Addressing Workplace Bullying & Other Inappropriate Conduct*

A psychologically safe<sup>15</sup> workplace is a workplace where employees can in good faith speak up candidly with ideas, questions, concerns, and even mistakes without fear of negative consequences. For an organization to be racially and socially just, **all** employees, regardless of status, rank, power, title, or racial, cultural, or gender identity, need to feel psychologically safe enough to authentically and meaningfully engage and contribute to the workplace without fear of reprisal.<sup>16</sup> <sup>17</sup>Some employees with marginalized identities who experience racism and other forms of oppression develop coping mechanisms to survive work environments that do not feel psychologically safe.

Workplace bullying can have significant, serious effects on physical and mental health. In addition, workplaces with high rates of bullying can also experience negative consequences, such as:

- financial loss resulting from legal costs or bullying investigations;
- decreased productivity and morale;
- increased employee absences;
- high turnover rates;
- poor team dynamics; and
- reduced trust, effort, and loyalty from employees.<sup>18</sup>

King County has a Non-Discrimination, Anti-Harassment, Inappropriate Conduct Policy<sup>19</sup> and Workplace Violence Prevention Policy<sup>20</sup> which take steps to address harm in the workplace. At Metro, there are also several different, division-based “codes of conduct.” There are opportunities to expand this foundation to explicitly include workplace bullying.

### **Quantitative Findings**

When answering the choice ranking question, “Which of the following would most improve your experience working at Metro Transit? Please rank where 1 is most important and 10 is least important,” on average, respondents ranked more consequences or accountability when employees behave badly or break work rules as the third highest need. (Please see Figure 5 and Appendix 2: Survey Data for complete quantitative results of these rankings.)

Overall, supervisors (64%) felt more comfortable than individual contributors (53%) speaking up. Black women were less likely to feel like they could speak up (49%) than White women (56%) or other Women of Color (61%). Black women supervisors were

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<sup>15</sup> [What Is Psychological Safety? \(hbr.org\)](https://hbr.org)

<sup>16</sup> [The Role of Psychological Safety in Diversity and Inclusion | Psychology Today](#)

<sup>17</sup> [Workplace Civility Through a DEI Lens - NeuroLeadership Institute](#)

<sup>18</sup> [Workplace Bullying: How to Identify and Manage Bullying \(healthline.com\)](#)

<sup>19</sup> [King County Non-Discrimination, Anti-Harassment, Inappropriate Conduct Policy](#)

<sup>20</sup> [King County Workplace Violence Prevention Policy](#)

also much less likely to feel they could speak up (44%) compared to other supervisors of color (75%) or White supervisors (60%). (See Figure 16.)

Overall, there were limited differences about speaking up between the Office/Admin environment (57%) and the Trades/Field/Shift environment (55%). Black women were more likely to feel they can speak up in the office environment (59%) vs. in the trades, field, or on shift (42%). Conversely, other women of color are more likely to feel they can speak up in the trades (65%) vs the office environment (56%). White women were slightly more likely to feel they could speak up in the office (59%) vs. the trades (54%). (See Figure 16.)

Gender expansive people are less likely (17%) than cisgender women (22%) to feel they can speak up or make a complaint. The majority of both groups (67% of gender expansive and 56% of cisgender women) did not feel they could speak up. (See Figure 21.)

### Qualitative Findings

A majority of respondents reported experiencing many of the characteristics of an organizational culture that routinely rewards maintaining the unhealthy elements of the status quo and punishes those who speak up in good faith alignment with living into the King County True North and Values.

Many of these respondents expressed feeling lack of support regarding bullying, retaliation and intimidation under current policies and codes of conduct.

These respondents' experiences of the current policy and code of conduct landscape suggest that there may not be enough in place to adequately address employee concerns and grievances in alignment with the King County True North and Values.

Examples from the respondents include:

- Disproportionate personal attacks of women-identifying employees.
- Disproportionate scrutiny of women-identifying employees.

*"I have been thinking about your question about "what would you change if you had a magic wand." I don't think that any one thing can change where Metro is today but our leaders need to learn to balance power and accountability. Leaders are prioritizing their organizational power over integrity and morals. We forget we are accountable to humans, who have families, have feeling, emotions. As humans we all long for love, respect, fairness, someone to advocate for us, defend us, stand by us when we are hurting, work on our weakness' and build on strengths, but people forget all that when they get a position of power. It's sad that these leaders have been on the receiving end and know exactly how it felt."*

- Witnessing other women employees coping with implicit and explicit bias by frequently avoiding, tolerating, excusing and/or rationalizing biased inappropriate conduct.
- Disproportionate explicit and implicit unfair treatment of women-identifying employees who raise concerns and speak up.

*“Metro is very male-centric. Misogynistic behavior & attitudes are the norm, not the exception. Women who try to challenge this are considered to be the problem.”*

Examples of disproportionate explicit and implicit unfair treatment of women-identifying employees, as reported by those we spoke with and who raised concerns, include patterns of:

- Ghosting:<sup>21</sup>
  - Cancelled meetings.
  - Non-responsiveness to emails.
  - Avoidance.
- Social isolation, invalidation & gaslighting:<sup>22</sup>
  - Exclusion from substantive or critical work despite previous involvement.
  - Pulling back of previously provided assistance.
  - Exclusion from promotional opportunities.
  - Target of rumors and gossip.
  - Condescending comments and ridicule.
- Absence of a well-defined reporting process and clear standards for addressing bullying or enforcing current codes of conduct or investigations within Metro:
  - Lack of procedure or process for enforcement of codes of conduct.
  - Lack of general follow-through by either supervisors, division leadership and/or HR.
  - Little to no communication or follow-up on commitments, investigations, and/or procedures or processes on performance management and enforcement of codes of conduct.
  - Little to no communication or follow-up on commitments, investigations, and/or procedures or processes on performance management and enforcement following EEO investigation findings.
- Inequity in grievance hearing process:
  - Respondents who have gone through grievance proceedings where they have reported experiencing harm or other inappropriate conduct by another union member ranked union representatives and grievance processes lower on the trust scale.

<sup>21</sup> [How To Recognize Workplace Ghosting And What To Do About It \(forbes.com\)](https://www.forbes.com)

<sup>22</sup> [7 Signs of Gaslighting at the Workplace | Psychology Today](https://www.psychologytoday.com)

- These respondents report an imbalance in support and advocacy in grievance hearings where both sides are represented by the union. Perceptions of those who participated in grievances indicate outcomes of grievance hearings (often) tend to favor males, white and/or those in a supervisor roles.
- Fear of retaliation in response to this assessment process and findings:
  - When discussing these areas of concern, based on previous experiences with surveys and assessments, most respondents indicated they were concerned or fearful for how the results of this assessment could be used to punish those who are perceived to have participated in this process.<sup>23</sup>

*“Employees don't get held accountable for poor performance or behavior, but if I say anything, I am treated differently by supervisors as well as coworkers which tells me that my conversation with the supervisor wasn't confidential.”*

*“I also think that some people seem to get away with ‘bad’ behavior, bullying and I do not understand why.”*

*“Management, especially top management, is where I have most often found problems. Whether it be gaslighting a complaint about a peer or engaging in favoritism, disparate treatment, or negating the contributions of women employees as opposed to men. These are all things I have experienced from management within the last year. I expect this from employees, but management should be held to a much higher standard and lead by example. This is not happening at Metro.”*

*“I hear beautiful, inspirational talking, but experience actions that are inconsistent with KC values. Leadership tolerates consistent chronic bad behavior, and merely “talks” to the same individuals repeatedly (especially those in leadership), or worse excuse it. The repeat offenders are worse when nobody is looking and have gotten better at hiding it.”*

*“From my point of view when these investigations are left to the bases leadership there can be biases towards certain employees that leads to the investigation sort of fading into nothing.”*

<sup>23</sup> For resource on the effects of retaliation see: [The Psychosocial Impacts of Whistleblower Retaliation: Shattering Employee Resilience and the Workplace Promise | SpringerLink](#)

## 2.6.d. Equitable Pathways to Career Advancement

### Quantitative

When answering the choice ranking question, “Which of the following would most improve your experience working at Metro Transit? Please rank where 1 is most

*“I feel I have no chance of advancing at Metro.”*

important and 10 is least important,” on average, respondents ranked access to promotions and career advancement opportunities that they can easily find out about as the fourth highest need. Similarly, on average respondents ranked opportunities to meet with similar employees, on work time, to share resources, provide mentorship and career support (such as ERGs) as their seventh highest need. (Please see Figure 5 and Appendix 2: Survey Data for complete quantitative results of these rankings.)

*“There is a dominant male culture in [this division]. The few women we do have are concentrated in support roles and do not work directly [on the] operations side of [this division]. Certain male individuals don't take kindly to being told what to do by women, assertive behavior, or being called out by women addressing their questionable behavior. If women rock the boat, they are targeted, bullied, and retaliated against. They get phone calls from [people in leadership] telling them to "get with the program or else," their complaints go unanswered, or they may be sidelined. When these power plays have worked historically and there are no serious consequences, then why would these individuals or the culture change? Women end up transferring, taking SDAs, promoting outside of the Division or agency, or leaving KC employment without a job in hand. Those who show managerial courage (rocking the boat and threatening traditional power) often times lose leadership support because leadership prefers calm waters instead of addressing tough personnel issues. It is more acceptable and tolerated for men to rock the boat or make mistakes. Leadership may even target the women themselves. While there are "A-teams" inside of [this division], the culture is mirrored within the Department - all the way to the top. [] Where can women turn to for unbiased help when men occupy these leadership positions and are loyal to those in power who aided their career advancement and to each other within the group, and not our KC True North values? Collectively we have answered annual employee surveys, EEO surveys, investigation questions, participated in [], filed complaints to EEO, HR, and to those outside of [our division]. Then we watch and listen. We observe how other women are treated around us and across Metro. In the end, limited effort is made by leadership to address the culture until the next hot topic arises and the focus and resources shift... and we continue to feel unsafe and our voices unheard.”*

## Qualitative

Respondents with experience on hiring panels reported that interview panels do not appear to be adequately and consistently screening for bias. There's little to no training on how racial, gender, and other types of implicit and explicit bias may influence the deliberation and interpretations of interviewee performance. HR is inconsistently involved in this stage of the hiring process. When they are, respondents who have participated in these processes report that they infrequently interrupt biased interpretations or statements.

*"There are many white women leaders at Metro that promote only white females into leadership positions."*

These reported gaps may reduce the number of qualified applicants advancing into promotional opportunities.

Respondents indicated that supervisors who are in the trades often tend to be men and seek out other men to deliver peer-to-peer training.

*"As a Female in [my division], we are denied specialty training or leadership opportunities. I continually watch my male counter parts [access] opportunities of training and leadership first even if I have asked for years. I do not get to participate in [the ERG/affinity group] unless I use my personal PTO to attend. It is incredibly unfair because it is a work function for women and I cannot attend especially when the subject of the meeting is about women[]. I am expected to perform gender bias duties for example, clean up after my coworkers before I could start my work because they had left the work area unsafe."*

This bias pattern over time reduces the opportunity for women employees to try out and showcase their emerging leadership skills thereby reducing their opportunity to be "groomed" for future leadership roles. This results in the cyclical effect of not breaking the "glass or concrete ceiling."<sup>24</sup>

The seniority-based system may create systemic barriers to accessing promotional opportunities in ways that disproportionately impact women employees. For instance, see the below comment from a bus operator describing the domino effect of the picking system for bus routes and shifts:

*"Another issue which has an impact on how women build their careers as transit operators is the perception of safety. Picking night work is often the only way a low-seniority Full-time operator can pick straight-through work (as opposed to combos which are split shifts that drastically increase the length of one's workday due to unpaid breaks between shifts). Many routes do not have comfort stations*

<sup>24</sup> [The Glass Ceiling: Women and Barriers to Leadership \(shrm.org\); Women of Color's Struggle Against Racism Is Revealed by the 'Concrete Ceiling' \(ssir.org\)](#)

*available at night or the available CS does not feel safe. An example of this is when I drove the [] and the comfort station at that end of route was/is a church...[] During the day, this was fine, there were usually other people in the church and on the street. At night, the building is large, empty, and isolated enough to feel very unsafe as in the event of an assault it would not be likely that anyone in the surrounding houses would hear anything. These kinds of safety concerns have a real impact on the earning potential of employees for whom gender/sex based violence is a risk.”*

#### **2.6.e. Reduce Workplace Bias & Improve Gender Equity Outcomes**

Individual contributors and supervisors generally have similar feelings about whether they are treated fairly (54% vs. 50%). When disaggregated by race and type of work, different patterns emerge. Those in the trades have generally worse feelings about fairness (43%) than those in the office environment (65%). Most Black women people leaders do not feel treated fairly (22%), especially compared to White women people leaders (67%). (See Figure 17.)

The majority of both the gender expansive (58%) and cisgender women (53%) groups do not feel that they are treated fairly. Gender expansive people are more likely to agree that they are treated fairly at work (25%) than cisgender women (20%). (See Figure 22.)

*“I have to wait for something really egregious to report, because I don’t want the reputation of being ‘trouble’.”*

*“It shouldn’t matter if you have high seniority, or worked for a number of years for the company, this should not dictate whether you can terrorize other employees at metro. Male employees should not touch women inappropriately, or at all without their permission. There are a lot of big personalities at metro, some people have smaller ones but they still should be heard. There needs to be disciplinary action behind failure to comply to these codes of conduct. In the event a situation arises where an employee has to file a complaint at a work site, that individual needs to be immediately removed, especially if a request for transfer has been made due to hostile working environment. It shouldn’t matter if you are in the middle of a shakeup, nor should seniority pick rules apply to this situation. No one should have to feel uncomfortable after such a complaint, for some individuals the anxieties that follow can impair overall work performance. Women need to feel protected while at work. Women should feel that the company supports an inclusive, safe, non-discriminatory work environment free from non-professional hostile behaviors.”*

## Qualitative

As indicated in the above findings in this report, respondents indicate that there are widespread double standards and a general bias against the few women in managerial or leadership roles as well as in ‘the trades’. It is perceived and experienced that women are not seen as subject matter experts, tokenized, often condescended to, held to higher standards, not taken seriously, sexually objectified, and often considered as ‘troublemakers.’

Respondents reported that offensive remarks, micro- and macro-aggressions are so widespread and overlooked that women employees rely on unhealthy coping strategies to just get through their workdays.

*“I have not heard more transphobic or misogynistic comments anywhere else than I have in the Metro bullpen where we wait to sign in.”*

Some respondents reported incidents of on-the-job sexual harassment and assault and in some instances have not reported incidents for fear of retaliation. Many respondents indicated mistrust of the reporting, investigation, and follow-up process.

Most individual contributor respondents reported getting minimal to no training on non-discrimination, anti-harassment and equity. Those who did indicated that the training was a one time “check-the-box” performative online training, or just handed a stack of documents to read. Most indicated little to no follow-up by supervisors to check for understanding, and they weren’t made aware of the various live trainings offered by Metro’s Learning & Development Team or other training resources or supports to help improve their work experiences. Some indicated appreciation for the various flyers, posters and other resources about non-discrimination and contact information to report to EEO office to file complaints. Others indicated that they experienced a confusing landscape of training and other resources making it difficult to identify what was useful and relevant to them.

Some respondents, who had previously filed complaints with the EEO office, expressed gratitude for the prompt responsiveness. However, many expressed frustration at the length of time for the investigation process and lack of follow-up or other communication from supervisors, HR and/or division leadership following an EEO finding, regardless of the outcome.

Respondents who had filed EEO complaints reported experiencing many of the bullying behaviors (outlined in this report above) by either peers or supervisors after filing a complaint, even though it is well-known that retaliation is forbidden. This hostile, psychologically unsafe environment creates a disincentive for employees to report possible violations of the Non-Discrimination, Anti-Harassment and Inappropriate Conduct Policy, which further reinforces unhealthy workplace culture and inequities.

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*“I am not sure if it’s metro, or me becoming more aware of micro aggressions – never have I ever experienced mansplaining, explaining, a male taking credit for my work, or been told to “Smile” by a man than before my tenure here.”*

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### 3. MEASURING PROGRESS TOWARDS ORGANIZATIONAL CULTURE CHANGE

When examining the health of organizational culture, there are three benchmarking developmental frameworks that provide helpful guidance for measuring current state, identifying specific and measurable goals, and charting a path forward for actionable strategies in implementing a desired future state as identified by the employees who may be furthest from access, equity and justice. They are:

1. Psychological & Interaction Safety;
2. Conflict Management; and
3. Multicultural Organizational Development.

#### 3.1. Psychological & Interaction Safety

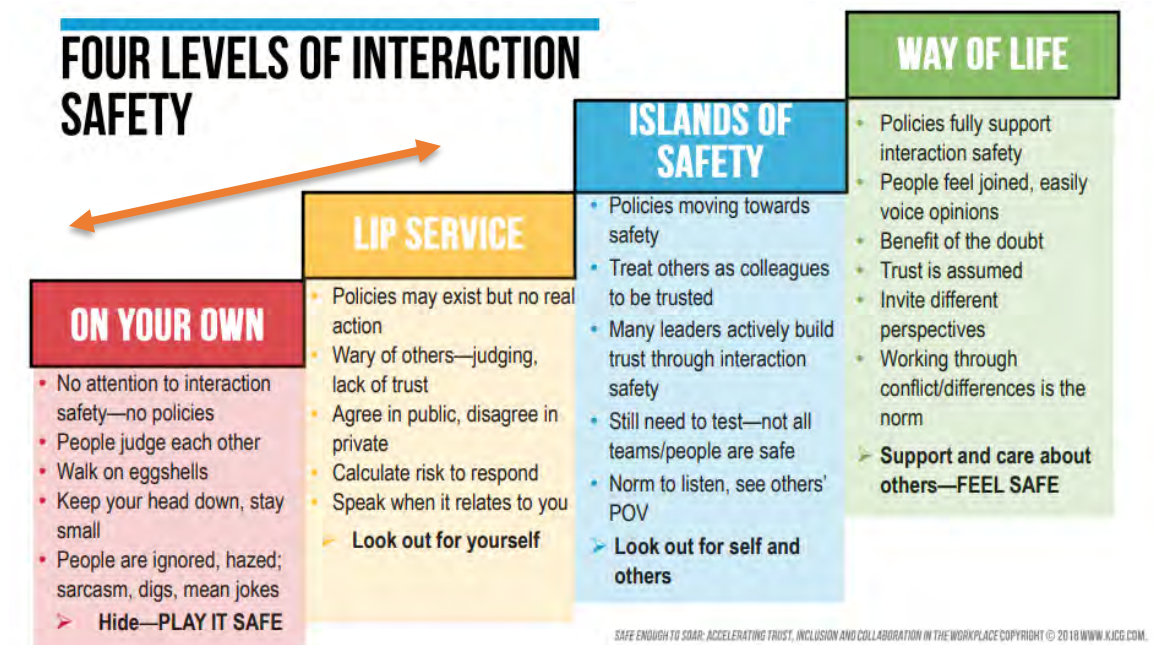
When assessing, repairing, and cultivating psychological safety in the workplace, all team members play an important role. However, it is critical for senior leaders and middle managers to create conditions to shift the burden of self-protection off those employees with marginalized identities and boldly model and co-create the necessary organizational culture conditions so that **all** employees can feel safe enough to thrive in the workplace. This bold culture change work includes *Leading the Way, Respecting all People*, and being *Racially Just*<sup>25</sup> in prioritizing all aspects of the implementation of the Equity, and Social Justice strategic plan<sup>26</sup>. In addition, it compels people-leaders to openly learn and practice the characteristics of Metro being a pro-equity, anti-racist organization, which includes 1) sharing power, 2) interrupting business as usual, 3) replacing it with something better, and 4) getting comfortable with discomfort.<sup>27</sup>

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<sup>25</sup> [True North and Values - King County](#)

<sup>26</sup> [Equity and Social Justice Strategic Plan - King County](#)

<sup>27</sup> [Becoming a pro-equity, anti-racist organization \(sharepoint.com\)](#)



On the interaction (analogous to psychological) safety developmental continuum adapted by Organizational Development Practitioners and DEI Consultants, Fred Miller and Judith Katz<sup>28</sup> (see above), the *internal* organizational culture of Metro Transit in its current state as reported by the majority of women-identifying and gender expansive employees who primarily work in the trades and/or customer/public facing roles suggest generalized characteristics of both the *first* (red) and *second* (yellow) levels of interaction safety<sup>29</sup>. This developmental continuum can serve as a benchmarking framework for identifying areas of opportunity for improvement and measuring progress toward a psychologically safer work environment for all employees.

### 3.2. Conflict Management

How an employee and their supervisor, two peers, a team, a section, a division, or a department relates to and manages conflict greatly impacts organizational culture and workplace equity outcomes. The way we engage in the workplace when faced with moments of disagreement or stress is deeply influenced by our cultural and other lived experiences. Great care and sensitivity to our intercultural differences<sup>30</sup> is essential when working towards healthier conflict management practices.<sup>31</sup>

Nationally acclaimed mediator, ombudsman, and organizational conflict expert Tom Sebok,<sup>32</sup> offers an accessible continuum for understanding the degrees or stages of

<sup>28</sup> See [Safe Enough to Soar \[Book\] \(oreilly.com\)](#)

<sup>29</sup> Assessment data suggests differences in experiences are related to respondents' marginalized identities, specific work group and/or division they work in.

<sup>30</sup> [Intercultural Conflict Style Inventory | ICS \(icsinventory.com\)](#);

<sup>31</sup> [Good Conflict Starter Kit](#)

<sup>32</sup> [Promoting a Respectful Working Environment 2014 Annual International Ombudsman Association Conference](#)

severity of conflict in the workplace. Framed on an axis “civil” to “criminal”, it can serve as a guide for generally identifying areas of opportunity to improve communication, manage expectations, and improve, as well as better enforce existing conflict-related policies and procedures.



Similarly, the well-regarded DISC workplace personality and leadership style assessment and team health expert Patrick Lencioni,<sup>33</sup> offer a complimentary conflict continuum that posits that the opposite axes of the continuum are “artificial harmony” and “mean-spirited personal attacks.” While often unintentional, artificial harmony is a common workplace dynamic particularly in office settings but can also underlie baseline expectations in trades settings as well.



Many of the experiences of conflict shared by respondents suggest that the day-to-day workplace systems and formal and informal norms and practices align with an organizational culture that *aspires* towards and results in artificial harmony in response to dominant organizational culture conflict management characteristics that either avoids, minimizes, tolerates or condones uncivility, misconduct, illegal conduct and in some instances criminal conduct. These two continuums can serve as guideposts for bravely identifying areas of opportunity for improvement and measuring progress towards healthier conflict management practices and protocols to benefit all employees.

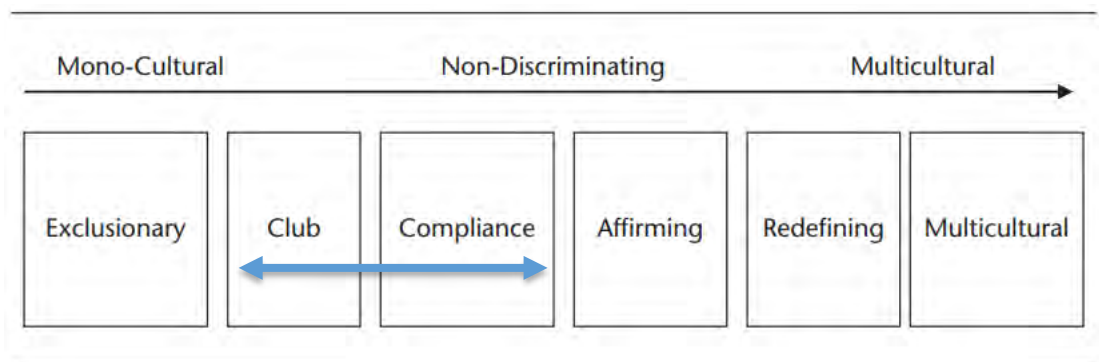
<sup>33</sup> [The conflict continuum: Where is your team? - discprofiles.com](http://discprofiles.com)

### 3.3. Multicultural Organizational Development (MCO)

The Multicultural Organizational Development continuum, originally developed by researchers Bailey Jackson and Rita Hardiman<sup>34</sup> (see below) and widely accepted within Diversity, Inclusion, Equity and Belonging and Organizational Development peer-reviewed research, provides a six-stage actionable vision and framework for assessing, benchmarking, goal-setting, and progressively becoming a multicultural, pro-equity and antiracist organization in alignment with the King County Equity and Social Justice Strategic plan.<sup>35</sup> While there have been many subsequent adaptations of this model in the evolution of pro-equity and organizational development practices, the original model proposes the final and sixth stage of development as:

“A multicultural organization (MCO) reflects the contributions and interests of diverse cultural and social groups in its mission, operations, products, and services. It acts on a commitment to eradicate social oppression in all forms within the organization. The MCO includes members of diverse cultural and social groups as full participants, especially in decisions that shape the organization. It follows through on broader external social responsibilities, including support of efforts to eliminate all forms of social oppression and to educate others in multicultural perspectives.”<sup>36</sup>

The *internal* organizational culture of Metro in its current state, as reported by the majority of women-identifying and gender expansive employees who primarily work in the trades and/or in frontline/ customer facing roles, suggest generalized characteristics of both *Club* and *Compliance* levels towards a multicultural, pro-equity, antiracist organizational culture.<sup>37</sup>



<sup>34</sup> [Theory and Practice of Multicultural Organization Development \(wisc.edu\)](#)

<sup>35</sup> A refresh of the King County ESJ Strategic plan is forthcoming. [esj-sp-refresh-engagement-frequently-asked-questions.pdf \(kcemployees.com\)](#)

<sup>36</sup> [Theory and Practice of Multicultural Organization Development \(wisc.edu\)](#), page 182

<sup>37</sup> Assessment data suggests differences in experiences are related to respondents' marginalized identities, specific work group and/or division they work in.

For a deeper understanding of the characteristics and trends of both *Club* and *Compliance* organizational culture stages, the researchers defined them as follows:

**“Stage Two: “The Club”**

The organization or organizational unit that is at the “club” stage can be thought of as stopping short of explicitly advocating anything like the majority group’s supremacy, but seeking to maintain privileges for those who have traditionally held social power. This is done by developing and maintaining missions, policies, norms, and procedures seen as “correct” from their perspective. The club allows a limited number of people from other social identity groups into the organization if they have the “right” perspective and credentials. The club is seen as more “liberal” with regard to social justice issues, compared to the exclusionary organization. It engages with social justice issues only when they can be approached with comfort and on club members’ terms.

**“Stage Three: The Compliance Organization**

The compliance organization is committed to removing some of the discrimination inherent in the club by permitting access to members of social identity groups that were previously excluded. It seeks to accomplish this objective without disturbing the structure, mission, and culture of the organization. The organization is careful not to create too many waves or offend or challenge its majority employees’ or customers’ bigoted attitudes or behaviors. The compliance organization usually attempts to change its social diversity profile by actively recruiting and hiring more non-majority people at the bottom of the organization. On occasion, the organization will hire or promote tokens into management positions (usually staff). When the exception is made to place a non-majority person in a line position, it is important that this person be a “team player” and “qualified” applicant. A qualified team player does not openly challenge the organization’s mission and practices, and is usually 150 percent competent to do the job.<sup>38</sup>

This organizational culture assessment also broadly affirms and aligns with many of the findings of the Black Women’s Experience Project, a King County survey commissioned by the King County Black/African Women’s Affinity Group in 2023.<sup>39</sup> In tandem with psychological safety and conflict management continuums, the MCO model can also serve as a framework for identifying areas of opportunity for improvement and measuring progress towards a multicultural work environment for all employees that is pro-equity and antiracist and brings everyone closer to living into the True North and Values.

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<sup>38</sup> [Theory and Practice of Multicultural Organization Development \(wisc.edu\)](#), page 181

<sup>39</sup> [Black Women’s Experience Project - PublicInput](#)

## 4. DESIRED FUTURE STATE: SUMMARY OF FINDINGS

The following proposed solutions are based on the collective reported experiences and ideas shared by and across five different divisions in Metro Transit. They are meant to prompt further conversations and ultimately support interested and impacted parties to co-create a meaningful solution design and implementation plans for next steps in pro-equity organizational culture change.



### 4.1. Workplace Health & Safety

#### 1. Collaborative Solution Designing

Conduct a comprehensive evaluation of security/incident protocol for divisions where employees interface with members of the general public, namely Bus Operations, Rail, Marine, and Facilities.

- Bring a representative sample of affected and interested parties for collaborative problem-solving and work planning (e.g. for Bus Operations: TCC, Security contractor, SSQA, law enforcement, senior leaders, first-line supervisors, operators).
- Audit/evaluate current security effectiveness and outcomes, including analyzing current training, expectations, protocols, and competence of contracted security personnel.
- Update, develop, and post Rights and Responsibilities of Metro Passengers in all public/customer-facing spaces.

*More focus on safety guidelines around the yard and when employees are doing solo work.“*

- Expand strategies for increasing King County Law Enforcement presence to pre-pandemic levels and replace security contractors where determined to be ineffective based on the above recommended evaluation.

*“Support for drivers dealing with harassment on the coach. Metro needs to make sure drivers know that they have the right to refuse service to passengers that are engaging in harassment, whether that harassment is directed at the driver themselves or other passengers. A lot of the women driving buses do not realize that they do not have to endure sexual or verbal harassment from passengers.”*

## **2. Expand Safety Protocols, Employee Training & Supervisor Support**

- Establish protocols for people managers to conduct safety and well-being check-ins with their direct reports and ensure annual action plans are developed and followed up on with their direct reports to best meet the needs of individual employees.
- Establish clear standard operating procedures (SOPs) and provide annual live training relating to how to interact with members of the public who are unhoused, have mental illness, and/or have a substance use disorder that contributes to real or perceived health or safety concerns for Metro employees.
- Expand training opportunities by offering training—and removing barriers to access that training—on mental illness, substance use disorder, and de-escalation tactics in alignment with the above SOPs.
- When a security issue or other stressful incident has taken place, train supervisors to:
  - empathetically ask: ‘how are you?’ and ‘how can I help?’ and appropriately follow up with a trauma-informed lens with direct reports.
  - routinely express appreciation, acknowledge what they do well, and thank employees for their service and dedication.
- Design clear protocols and ensure timely follow-up and status updates from people managers after safety incidents have been appropriately reported.

## **3. Safety Equipment & Environment**

Provide more:

- parking options and/or security in reserved lots;
- sizing and fit options for safety vests, gear and other uniforms; and
- gender-sensitive options for quiet and rest spaces.

### *Graveyard Shift Specific:*

Ensure that no employee is working alone on-site, especially at night:

- offer a security escort;
- design and implement buddy systems;

- provide radios for improved communications where cell phone signals are poor; and
- provide better lighting at worksites.

### *Bus Operations Specific:*

#### **1. Fare Enforcement**

Respondents from Bus Operations indicated that the majority of safety incidents involve non-paying passengers. If Metro intends on increasing fare enforcement, this burden should shift from the operators to fare enforcement personnel trained in de-escalation, mental health and substance use disorders.

#### **2. Safety shields**

The majority of respondents from Bus Operations indicated that the current safety shields are flimsy, create hazardous driving conditions because they can't be easily seen through, and provide no protection from harassment and violence. While there's no consensus on a perfect solution, a majority of operators indicated a strong preference for Metro investing in enclosed driving space (similar to light rail) to create a safer barrier between operators and offending members of the public.

#### **3. Safety Incident Response Protocols**

- First-line supervisors
  - When a security issue or other stressful incident has taken place, ensure all TCC and other first-line supervisors empathetically ask: 'how are you?' and 'how can I help?'
  - Shorten response time for first-line supervisors to provide on-site assistance.
  - Hire more first-line supervisors with operator experience who are responsible for much smaller geographic zones. This may yield supervisors with greater sensitivity to the operator experience and faster response times when operators are in tough situations.
- Have security personnel ride coaches especially on routes with a history of severe safety incidents.
- Provide more security at layovers.

#### **4. Safety & Wellbeing Environment**

- Offer more operator safety training and routine refreshers.
- Offer more support and tools, resources and training on boundary-setting and self defense.
- Provide more overtime options.
- Provide more and cleaner comfort stations that aren't shared with the general public with high rates of being exposed to drug use and unsanitary conditions.
- Provide longer break times to have more time to access restrooms, food and mental health recovery; where break time is safeguarded and not impacted by traffic delays or distance between worksites.

## 5. Coach Air Quality & Cleanliness

- Update HVAC systems to improve air quality on the coaches. Respondents reported that current systems are inadequate where fumes from harmful substances used by an increasing number of passengers get circulated without proper filtration.
- Improve coach cleaning procedures and quality assurance to match expectations during the pandemic including expectations from operators to maintain a clean driving area for the next operator. Respondents reported that sanitation levels and expectations have significantly decreased since the height of the pandemic and have not adjusted for the increase in ridership.

## 4.2. Support & Training in Current Job

### 1. Assess Training Content & Delivery

Conduct comprehensive division-based re-evaluations of content and delivery of skills-based tests and trainings (include perspectives of frontline and tradespeople in the analysis)

*“Training.... Real training not knowledge passed down from a co-worker.”*

that examines:

- |                                   |                          |   |
|-----------------------------------|--------------------------|---|
| ❖ Onboarding                      | ❖ EEO compliance;        | ❖ Conflict Management                           |
| ❖ Job specific skills development | equity and belonging     | ❖ Professional Development & Career Advancement |
| ❖ Safety & Wellbeing              | ❖ Performance Management |   |

- Increase standardized, built-in, predictable, transparent skills-based training time for all employees to reasonably access.
- Increase standardized, hands-on, on-the-job training that is transparently tracked to ensure equal access for all employees.
- Develop and implement a transparent and standard onboarding and annual training checklist by classification/job type that supervisors use together with their direct reports to track progress towards training goals.
- Standardize EEO, sexual harassment and other equity-related trainings into the onboarding process.

### 2. Mandatory Training & Annual Review

Require all employees to attend annual live:

- EEO legal and policy compliance trainings, including sexual harassment, and consequences for non-compliance for all employees.
- Appropriate conduct trainings in alignment with updated proposed codes of conduct (see below).

### 3. Supervision Best Practices

- **Onboarding Checklists:** Develop new employee onboarding checklists with standardized and narrowly customized elements related to specific job. Annually review and revise checklists with section and/or division leadership.
- **360 Assessment for People Managers:** Incorporate 360-degree assessments for people managers' professional development.
- **Empathy & Respect:** Develop and deploy leadership development resources and best practices for managers on how best to follow and enforce union contract language and policies while also demonstrating empathy, respect, and modeling a growth mindset with direct reports.
  - Assign a liaison at each division responsible for overseeing, evaluating and improving supervision best practices, deployment and training and coordinating L&D efforts with EIB and OHD.
  - Incorporate required people skills trainings for managers:
    - from punitive to coaching mindset skills: how are you/ how can I help/ what do you need?
    - Clarify supervisors' roles to help employees succeed in their jobs and support their career growth.
- **Check-ins:** Have regularly scheduled supervisor check-ins with all direct reports using a check-in template (see [sample](#) from Management Center) to ensure key topics are covered, including job satisfaction and professional development.

#### 4. Systems and Tools Access

- Design and implement checklists managed by people leaders to ensure that all employees have the necessary and equal access to working equipment and tools.
- Design and implement checklists to ensure that all employees have access to administrative resources, including graveyard shift workers who can't easily access administrative offices/services e.g. IT support, ORCA card replacement, medical services.

#### 5. Work-Life Balance

- Through collaborative solution designing, co-create—with the most impacted employees—innovative approaches to flexible scheduling.
- Provide more resting areas and coffee stations.

#### 4.3. Performance Management, Addressing Workplace Bullying & Other Inappropriate Conduct

This assessment has revealed gaps in multiple and potentially misaligned sources of performance and behavioral expectations in Metro. This misalignment creates real or perceived confusion, inefficiencies, institutional inertia, and inconsistent or arbitrary enforcement, possibly resulting in inequitable outcomes. Coupled with a lack of standardized HR tracking systems that measure outcomes, this may create or

perpetuate greater barriers to employees who may be furthest from access, equity, and justice.

These gaps may create opportunities to better align the King County True North and Values (TNV), King County policies, division-based codes of conduct, workgroup expectations, team norms, various union contract language, (whether it regards an EEO protected class or not) to provide clearer and more uniform norms, behavioral expectations and progressive discipline procedures (for both union and non-union represented employees). In addition, having a more uniform data collection process of outcomes (whether EEO or union-related or not) across these systems will likely better help measure progress around culture change goals.

### 1. Strengthen Data Tracking, Processes, Communication & Outcomes

- Develop and/or strengthen a uniform, transparent, centralized tracking and reporting system for progressive disciplinary outcomes data on EEO-related complaints (after findings have been issued) for both union-represented and non-union-represented employees.
- Develop a uniform, transparent, centralized tracking and reporting system for progressive disciplinary outcomes data on non-EEO-related complaints (performance management and non-EEO-related inappropriate conduct complaints) for both union-represented and non-union-represented employees.
- Through a collaborative solution design process engaging subject matter experts as well as interested and impacted parties, develop and make accessible to all employees clear (HR, EEO, and people manager level) processes and expectations for a complaint lifecycle (whether EEO or non-EEO-related) including but not limited to: timeline, investigation process, findings, follow-up, consequences or other action, support resources (e.g. EAP, ERG, peer support groups, etc.), and what employees should do if they feel they are being retaliated against or experience other adverse workplace action.

*“It would be great if investigations brought to EEO would result in actions that make the workplace better and are visible for all of us to see and know about.”*

*“There needs to be a behavioral policy to cover ALL employees, not just the protected classes, some of us work in a hostile work environment that is being supported by leadership. Values spoken but no action being taken, there needs to be more than just lip service. Equitable opportunities for all not just members of the “A TEAM” or the COUNTRY CLUB mentality. No retaliation for speaking the truth to power or communicating directly. There is a true abuse through behaviors toward women in trades.”*

## 2. Strengthen Existing Codes of Conduct

- In alignment with TNV, King County policies, and union contracts, strengthen existing codes of conduct by
  - standardizing/unifying all codes of conduct to;
    - address specific, prohibited behaviors associated with workplace bullying and non-EEO-related retaliation;
    - include expected leadership behaviors; and
    - communicate clear consequences for non-compliance.
- Develop clear, standardized, and accessible supervisor and HR protocols and procedures for 1) investigating allegations of non-compliance with codes of conduct, 2) follow-up with parties, and 3) track processes and outcomes (see above regarding data tracking).
- Incorporate trainings in alignment with established codes of conduct and complaint procedures.<sup>40</sup>

*“I don't necessarily agree with more consequences but consistent consequences and process for investigations. From my point of view when these investigations are left to the bases leadership there can be biases towards certain employees that leads to the investigation sort of fading into nothing.”*

## 3. Policy Development

Working with other King County partners, collaborate to establish a King County workplace bullying and retaliation policy in alignment with TNV and union contracts.

## 4. Grievance Hearings

- In grievance hearings in which one union member alleges harm or policy violation caused by another union member; both union members are afforded an advocate, not just the one being accused.
- Offer separate union representation between supervisors and individual contributors to reduce real or perceived conflicts of interest.

*“Management needs to address the retaliation issue at Metro. Management also needs to look at their own people in management that have non ethical practices.”*

## 5. Conduct Comprehensive Analysis of Expectations Landscape

- Conduct comprehensive inventory, analysis, and findings of policies; codes of conduct; King County True North and Values (TNV), labor contracts' language; and team, workgroup, section, and division norms related to:

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<sup>40</sup> For resource on the effects of retaliation see: [The Psychosocial Impacts of Whistleblower Retaliation: Shattering Employee Resilience and the Workplace Promise | SpringerLink](#)

- Behavior/conduct expectations;
- HR and complaint investigation processes and procedures;
- Performance management and progressive discipline process and procedures; and
- Grievances processes and procedures.
- Using the above inventory, conduct two secondary-level analyses of tracked and untracked outcomes related to;
  - EEO protected class claims associated with allegations of violations of the Non-Discrimination, Anti-Harassment and Inappropriate Conduct policy by:
    - Type of complaint;
    - Demographic;
    - Job classification;
    - Individual contributor/supervisor status; and
    - Union represented status -- Including when parties are represented by same union or not.
  - Non-EEO protected class claims with allegations of violations of other policies; codes of conduct; TNV, labor contracts' language; and team, workgroup, section, and division norms related to behavior/conduct expectations by:
    - Type of complaint;
    - Demographic;
    - Job classification;
    - Individual contributor/supervisor status; and
    - Union represented status -- Including when parties are represented by same union or not

*“What I need most is for men, not just men in power but all men to speak up when they see or hear something inappropriate. This is the only way we will see a culture change. I have to wait for something really egregious to report, because I don’t want the reputation of being “trouble”. There needs to be real consequences for the people who are looking the other way when they see inappropriate behavior.”*

*“...each [bias] report and event be taken professionally and seriously. There should be a committee capable of real influence similar to the safety committee but covering inequality and bias issues and policy. Additionally there should be people at each base or division location specifically for us to turn to and speak to to report events too who would support us without bias and act as a liaison with metro regarding these issues”*

## **6. Expand Metro & Labor Partnerships**

Deepen collaboration and strategic alignment between Metro and labor partner leadership by co-creating, launching, and sustaining a Joint Civility & Respect Campaign to help reinforce workplace

conduct standards in alignment with the True North and Values, relevant policies, and labor agreements.<sup>41</sup>

*“Address behavior inconsistent with KC values; []Enforce behavioral accountability at all levels in the organization. Specifically, address bullying behavior towards women, from both men and women. Specifically, address retaliation behavior towards women when they speak truth to power, speak differing/strong opinions, and/or communicate in a more direct, or outspoken style. Specifically, address the "exclusive country club membership" environment where members receive all the perks and protection of belonging and those who are not members are not afforded the same opportunities, resources, access to power, advancement, recognition, training, grace, flexibility, and support when experiencing bad behavior from co-workers.”*

#### 4.4. Equitable Pathways to Career Advancement

##### 1. Sponsor & Support Division-Based Employee Resource Groups (ERG)

- Develop charters for women- and gender expansive-employees ERG(s) that are aligned with TNV that set annual goals and focus on building community, breaking isolation, mentorship, resource sharing and training access.
- Provide dedicated staffing/skilled facilitation:
  - Assign EEO, EIB and/or OHD dedicated staffing to provide support;
  - As part of intentional leadership development planning, upskill a rotation of division-based frontline facilitators for ERG meeting planning and facilitation; and
  - Establish and promote an Anti-Sexism Men Ally Group (ASMAG) ERG designed to raise awareness of gender bias in the workplace and promote ally-based equity practices.
- Remove barriers to access ERGs:
  - Create widely accessible standard operating procedures on how to request and attend an ERG;
  - Ensure adequate and dedicated administrative staffing support to assist with schedule coordination and any necessary paid detailing;

*“I would like to see more networking opportunities involving women.”*

<sup>41</sup> [Workplace Bullying University® for Unions Training – Workplace Bullying Institute](#); [Civility at Work - 2024 Civility Index Research \(shrm.org\)](#)

- Require supervisors to inform new hires and routinely remind employees of ERG resources; at minimum, during annual performance appraisals.

## 2. Invest in Pipeline Entry and Advancement Programs for the Trades

- Entry level:
  - Increase gender & racial diversity: Increase and expand innovative community, educational and industry-based partnerships to increase the number of qualified women-identifying and gender expansive applicants for trades roles.
  - Create more apprenticeships that intentionally invest in supporting and mentoring participants.
- Advancement level:
  - Establish equity-driven standards for posting training and promotion opportunities.
  - Design and implement creative, on-the-ground outreach strategies about advancement opportunities to intentionally include and invite employees who are less visible to management.
  - Incorporate supervision best practices (see below) that include intentional mentoring and coaching for professional development and career advancement.
  - Create more pathways to upward mobility:
    - Analyze and share findings of current career advancement opportunities by division.
    - Which divisions and their sections have more pathways and options?
    - Which divisions have the greatest upward mobility?
    - What opportunities are there to design pathways outside of a division with fewer opportunities while leveraging experience from other divisions?
  - Consider establishing term-limits to senior leadership positions to increase more opportunities for upward mobility for underrepresented employees.

*“Hire more women in bus operations. I have doubt much will change until more women are on the frontlines.”*

## 3. Establish Supervision Best Practices & Expectations (See also cross-referenced suggestion solutions under Support & Training in Current Job.)

There’s an opportunity to offer people leaders clear best practices and performance expectations on how they can support and help all their employees in their career development, not just those with whom they feel more comfortable.

Provide required leadership development and supervision training series covering general management practices, and best practices for supporting employees’ on-the-job performance, well-being, and career growth, including how to:

- Cultivate self-awareness and empathy;

- Identify, interrupt, and reduce confirmation, proximity, and similarity bias;
- Create a culture of care (day-to-day practices modeled by leaders) for all employees;
- Listen for understanding;
- Develop a shared understanding of expected leadership behaviors;
- Strengthen inclusive communication expectations, skills, and etiquette;
- Communicate clear expectations and processes for giving, receiving, and inviting feedback;
- Provide acknowledgement and sincere appreciation;
- Design and communicate decision-making processes and rationale as well as when/how to include others in the process;
- Clarify roles and responsibilities;
- Establish and communicate clear expectations on when and how skip-level communications are appropriate;
- Implement strategies for increasing employee access and removing barriers to training and other development opportunities;
- Have coaching conversations, mentoring, and career advancement exploration with direct reports.

#### 4. Reduce Bias in Hiring and Promotional Processes

- Reduce bias in interview panels:
  - Establish screening questions, particularly for people-manager roles that address competency in the following inclusion and accommodation best practices:
    - Race/ethnicity;
    - Gender;
    - Gender identity; and
    - Disability.
  - Ensure EIB, EEO or other formal workplace equity practitioner(s) with gender equity skills should be involved in hiring panels and assist with the evaluation of hiring panel process and decision-making to help interrupt and reduce implicit bias.
- Reduce bias in identifying which employees get selected for promotional opportunities:

*“The good old boys club in our leadership ranks in [] and [] is clueless to the optics. These men really don’t get what you are trying to say. They feel like they are being attacked, and they get very defensive and don’t listen to women’s suggestions.”*

- Evaluate the weight of interview performance: Through a collaborative solution-design process with a variety of interested and affected parties, evaluate best practices for conducting interviews and appropriate weight of interview performance-based customization for job type.
- Incorporate a standardized equity auditing tool or process for evaluating internal applicant advancement access.
- Reach out to previous applicants who've been passed up in the past.
- Incorporate intentional, transparent succession planning.
- Provide feedback to internal applicants about the strengths and weaknesses in their application and/or interview and what they can do to improve performance in the future.

*“Don’t base the ability to hire someone, solely on the interview. If they have a proven track record, don’t let a not-so-good interview ruin chances of promotion. This is a common issue with the hiring process and is discouraging.”*

#### 4.5. Reduce Workplace Bias & Improve Gender Equity Outcomes

##### 1. Equity Analyses

Respondents anecdotally report disparate impact based on both race and gender. Collecting HR and demographic data on these issues may objectively reveal these disparities and provide insight into how to strategically problem-solve for these disparities.

- **Pay Equity:** Conduct a pay equity regressive modeling analysis which includes collecting human resources data on employee education level and reclassification outcomes.
- **Attrition Rates:** Conduct a retrospective and predictive logistic regression analysis of attrition rates by employee demographics and job type.

##### 2. Expanded & Coordinated Learning and Development (L&D)

(See also cross-referenced suggestion solutions under Equitable Pathways to Career Advancement and Support & Training in Current Job.)

- **Gender Equity Trainings:** Design and implement Gender Equity specific trainings that review relevant policies and codes of conduct and address institutionalized sexism and other common issues affecting women-identifying employees, including but not limited to:
  - What is gender bias? How does it show up in the workplace? What should be done about it?
  - Micro and macro aggressions;
  - Common workplace bullying behaviors;
  - Bystander interventions;

*“Give more time for equity work”*

- Sexual harassment;
- Impacts of intersecting identities and compounding biases;
- Disproportionate impacts on health, wellbeing, safety and career advancement; and
- Review of relevant policies, expectations, and consequences for non-compliance.
- **Men’s Leadership Community of Practice:** Expand and scale Metro’s Men’s Community of Practice pilot project to train, support, mentor and strategically deploy a cadre of male-identifying leaders and other employee allies committed to undoing institutionalized sexism in the workplace.
- **Gender Equity Ally Group:** Establish and promote an Anti-Sexism Men Ally Group (ASMAG) ERG designed to raise awareness to gender bias in the workplace and promote ally-based equity practices.
- **Standard Equity Training Hours:** Establish explicit standards and expectations on the annual number of hours each employee is entitled and expected to attend equity and conduct-related trainings.
- **Evaluate Training and L&D Ecosystem:** Through a collaborative, solution design process involving interested and impacted parties, including but not limited to Metro L&D, King County L&D, SSQA, EIB, and division leadership, evaluate current coordination, delivery, and content of employee training that includes:
  - Onboarding and initial occupational skills development.
  - Occupational skills-based training specific to current job role/workgroup.
  - professional development and career advancement.
  - Metro learning and development based trainings.
  - King County learning and development based trainings.
  - EEO, sexual harassment, appropriate conduct, and other equity-related based trainings.
  - Incorporate into above the required EEO, sexual harassment, and other equity-related training to all employees regarding legal rights and responsibilities in alignment and compliance with the:
    - King County Non-Discrimination, Anti-Harassment and Inappropriate Conduct policy;
    - proposed updated codes of conduct; and
    - proposed King County Workplace Bullying policy and consequences for failure to comply.
- **Design & Implement:** implement recommendations from above evaluation;
- **Test for Understanding:** Annually test for understanding and require refresher trainings.

### 3. Race, Ethnicity, Immigrant & Refugee Status, & Identity

While this assessment focuses on many of the shared experiences and proposed solutions of women-identifying and gender expansive employees across differences, in

alignment with the principles of targeted universalism,<sup>42</sup> it also underscores greater opportunities for nuanced understanding and meaningfully addressing the unique workplace needs of women-identifying and gender expansive employees with diverse racial, ethnic, and cultural backgrounds and identities. These cultural identities and lived experiences may result in intersecting and compounding experiences of biases and barriers to access, equity, racial and social justice in the workplace, as was recently revealed by the King County Black Women’s Experience Survey findings.<sup>43</sup> Respondents with some of these identities reported that some of these unique experiences and needs may include different:

- preferred communication, behavioral norms, and conflict styles;
- English language fluency;
- gender role expectations; and
- workplace expectations regarding trust, physical and psychological safety, and speaking up in a hierarchical workplace environment.

It is important to note that addressing and investing in improving gender equity outcomes in the workplace does not de-emphasize or replace the continued need for renewed commitment, investing in and taking deliberate action on advancing racial justice and other equity priorities reflected in our True North and Values and championed in the county’s Equity and Social Justice strategic plan and forthcoming ERSJ strategic plan refresh. Explicitly improving gender equity outcomes strategically compliments and amplifies those efforts.

#### **4. Disability Status/Identity Access & Equity**

This assessment and demographic data collection limitations underscores greater opportunities for identifying and meaningfully addressing the workplace needs of employees with visible and invisible disabilities. These disabilities may result in intersecting and compounding experiences of biases and barriers to access, equity, racial and social justice. In compliance with relevant laws, these opportunities may include, but are not limited to:

- Establishing and/or improving centralized data collection systems that track employee access, other experiences, and other outcomes related to disability;
- Providing education for all employees about visible and invisible disabilities, civil rights, accessibility, and reasonable accommodations;
- Ensuring accessible resources on the above; and
- Conducting a comprehensive organizational culture and needs assessment to help identify solutions that results in greater equity outcomes for employees living with visible and invisible disabilities.

#### **5. Gender Identity Access & Equity**

Recent national data reveal that trans and gender expansive employees face various workplace challenges impacting their well-being and careers.

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<sup>42</sup> [Targeted Universalism | Othering & Belonging Institute \(berkeley.edu\)](#)

<sup>43</sup> [Black Women’s Experience Project - PublicInput](#)

“Research gathered by the United States Transgender Survey (USTS) collected data from over 27,715 trans people living in all 50 states, with 70 percent of the sample having held or applied for a job the prior year. Out of the participants, 27 percent of individuals were denied employment or promotion or even fired because of their gender identity. Even further, 15 percent of all respondents reported being verbally harassed, physically attacked, or sexually assaulted at work because of their gender identity.”<sup>44</sup>

While King County has adopted policies for Supporting Transgender, Non-Binary and Gender Diverse Employees<sup>45</sup> and offers voluntary trainings on building gender inclusive spaces<sup>46</sup>, many trans and other gender expansive respondents reported gender identity workplace disparities. These disparities may result in intersecting and compounding experiences of biases and barriers to access equity, racial and social justice. They also underscore greater opportunities to deepen and expand access, inclusion, workplace safety and wellbeing, and anti-harassment as well as career advancement opportunities for trans and gender expansive employees. In compliance with relevant laws, these opportunities may include, but are not limited to:

- Establishing and/or improving centralized HR data collection systems that better track employee gender identity;
- Expanding education on building gender inclusive spaces and civil rights compliance;
- Ensuring policy and education resources are routinely shared, reviewed, and discussed at all levels of the organization; and
- Conducting a comprehensive organizational culture and needs assessment to help identify solutions that result in greater equity outcomes for trans and gender expansive employees.

## 6. Caregiver Status/Identity Access & Equity

National studies report that gender disparities in caregiving continue in 2024 where women continue to be the majority of primary caretakers for younger and older family members.<sup>47</sup>

*“Better understanding for working mothers.”*

The results of the online survey in this assessment reveal that affordable childcare, on average, ranks lower on the list of priority needs for respondents compared to other needs. Other types of caregiving (i.e. for aging family members) are not listed as a

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<sup>44</sup> [Data Reveals New Insights on Transgender Workplace Experiences | April | 2024 | Newsroom | Teachers College, Columbia University](#)

<sup>45</sup> [Gender identity in the workplace \(kingcounty.gov\)](#)

<sup>46</sup> [Equity, Racial, and Social Justice Training - King County, Washington](#)

<sup>47</sup> [Gender Reveals: Data Shows Disparities in Child Care Roles | Healthiest Communities Health News | U.S. News \(usnews.com\)](#); [Women and Caregiving: Facts and Figures - Family Caregiver Alliance](#); [New U.S. Workforce Report: Nearly 70% of Family Caregivers Report Difficulty Balancing Career and Caregiving Responsibilities, Spurring Long-Term Impacts to U.S. Economy - Thursday, May 16, 2024 \(aarp.org\)](#); [National Survey of Caregiver Stress](#)

choice rank on the quantitative instrument. However, qualitative findings suggest that respondents who identified as parents and/or caregivers prioritized the following top needs:

1. affordable and accessible (on-site) childcare;
2. hybrid and flexible schedules; and
3. caregiving support services.

Respondents report that parents and caregivers miss out on professional development and advancement opportunities.

Roles in the trades and customer-facing that are adaptive to the needs of working parents or caretakers will likely help increase the number of women applicants who can better thrive and advance in these roles (along with other strategies). Collecting demographic data about caregiver status will allow Metro to better measure the current state of roles, opportunities and workplace environment needed for caregivers to thrive in the workplace. Benchmarking the data will contribute to more narrowly tailoring appropriate workplace solutions and measure progress towards goals yielding greater access and gender equity.

## 5. CONCLUSION

The general findings of this assessment reveal five primary areas of opportunity to improve the workplace experience and well-being of Metro employees who primarily identify as women and gender expansive employees in the trades, doing shift-based work, and/or are public/customer-facing including:

1. Workplace Healthy & Safety;
2. Support & Training in Current Job;
3. Performance Management, Addressing Workplace Bullying & Other Inappropriate Conduct;
4. Equitable Pathways to Career Advancement; and
5. Reduce Workplace Bias & Improve Gender Equity Outcomes.

While each of these themes has specific and customized solutions offered by the respondents, many of these themes are interconnected and underscore general opportunities for Metro to invest building on and improving the following:

1. Standardized processes and expectations designed with an equity lens with explicit alignment with True North and Values;
2. HR analytics, including data collection, transparency, tracking, and access;
3. Creative and innovative collaborations on shared interests and goals between Metro leadership and labor partners;
4. Employee training, supervision best practices, resources, access, mentoring and support; and

5. Collaborative problem-solving strategies that include employees who may be furthest from access, equity, and justice.

Metro and King County have an opportunity to build on the goodwill of their existing access, equity, and belonging efforts by bravely listening to, prioritizing, and taking measurable, concrete steps to better meet the needs of some of its most disenfranchised employees. This report provides a blueprint for taking those next steps.

## 6. RECOMMENDED NEXT STEPS

### 1. Metro Addendum

Metro supplements this report with an addendum via the annual EEO Program Report Update that addresses each of the five areas of opportunity in a similar format that:

- summarizes current key activities, initiatives, and programs (what's already underway);
- summarizes prospective key initiatives (what's already planned for the future);
- provides a summary of select short, medium and longer term commitments (goals) that will be made resulting from this assessment and report.

### 2. Share with Impacted & Interested Partners & Parties

Design and implement a comprehensive communications plan sharing the results and commitments resulting from these findings:

- Wide grassroots outreach and follow-up with respondents via:
  - Attending ERGs, affinity group, and other employee group meetings,
  - Attending Bus Ops Speak Listen Communicate Group,
  - Metro internal newsletters, and
  - Labor partner internal newsletters;
- Metro senior and division leaders;
- Labor partner leaders;
- Office of Equity Racial and Social Justice; and
- This assessment's Guidance & Action Team.

### 3. Work Planning

Using Best Run Government change management practices<sup>48</sup>, impacted divisions and workgroups should submit customized work plans that incorporate select short-, medium-, and longer-term commitments (goals). See Appendix 3 for a generalized sample template.

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<sup>48</sup> [Best-Run Government Roadmap \(sharepoint.com\)](https://www.sharepoint.com)

#### **4. Ensure Sustainability**

- Assign a senior-level FTE organizational strategist (SDA or consultant) skilled in change management, continuous improvement and ERSJ, reporting directly to EEO Officer and General Manager, that facilitates a collaborative solution design process, work planning and oversees and coordinates multiphase delivery on commitments and goals by interested and affected parties.
- Assign a program/project manager to support in workplan coordination, communications and delivery.
- Identify specific role from each of the following (with an agreed-upon percentage of a management level FTE) uniquely dedicated to liaising, coordinating, and timely implementation of respective workplans:
  1. All 11 divisions;
  2. Organizational Health & Development Section;
  3. Equity, Inclusion & Belonging Section;
  4. SSQA;
  5. EEO office; and
  6. General Manager's Office.

## 7. APPENDICES

### 1. Survey Questions



## Culture Change at Metro 2024 Women's Needs Assessment

- **Do you work in the trades and/or work on-site for Metro?**
- **Do you work when most people are sleeping?**
- **Want REAL improvements in the lives of women who work at Metro?**

In cooperation with members of the Metro WOMEN Employee Resource Group (ERG), the Metro Equal Employment Opportunity (EEO) Office wants to hear directly from women in the trades and other women who work on-site, including trans women and non-binary employees, about what they need most to help make real improvements in their lives at work. This will help Metro leadership make important decisions about the budget and priorities that improve the lives of women employees.

**What?** We want to understand what specific actions, changes and resources Metro can provide or invest in. We want to meet with people either in small groups or one-on-one, ask a few questions and hear ideas. Or take this survey!

**Who?** Women employees and employees with lived experience being gendered female, including transgender women, nonbinary and assigned female at birth. We especially want to hear from women of color at Vehicle Maintenance, Rail, Marine, Facilities & Bus Operations who may experience the greatest barriers to equity and justice at Metro.

**What's next?** We'll pass on a summary of the top needs that women workers share with us to Metro leadership by summer 2024.

**For more info:** Contact Aline Carton-Listfeld at [acartonlistfeld@kingcounty.gov](mailto:acartonlistfeld@kingcounty.gov).

\* Required

**Participation is totally optional. All answers are confidential. To report discrimination, harassment, retaliation, or inappropriate conduct, please contact the EEO Office at [MetroEEO@kingcounty.gov](mailto:MetroEEO@kingcounty.gov).**

**If you would like to see this survey in another language:** Please contact [acartonlistfeld@kingcounty.gov](mailto:acartonlistfeld@kingcounty.gov) and note your preferred language. The sponsors of this project will do their best to translate the survey into languages where there is a high demand from employees.



Intérprete 翻译员 翻譯員 ኣስተርጓሚ  
Thông dịch viên مترجم Turjumaan  
Перекладач Переводчик 통역사

1

I feel safe at work. (1 = you strongly disagree and 5 = you strongly agree) \*

1

2

3

4

5

2

I feel like I can speak up or make a complaint without getting in trouble or fired. (1 = you strongly disagree and 5 = you strongly agree) \*

1

2

3

4

5

3

I feel like I'm treated fairly at work. (1 = you strongly disagree and 5 = you strongly agree) \*

1

2

3

4

5

4

Which of the following would most improve your experience working at Metro Transit? Please rank where 1 is most important and 10 is least important. If none of these address your top needs, please share those needs in the next question. \*

I need more training and support to succeed at my current job

I need affordable childcare at my work site

I need more safety and security at my work site



I need more safety and security to and from where I work

I need my direct supervisor to encourage and support my career goals

I need access to promotions and career advancement opportunities that I can easily find out about

I need opportunities to meet with similar employees, on work time, to share resources, provide mentorship and career support for each other (such as an Employee Resource Group)

I need more flexibility in shifts scheduling

I need there to be more consequences or accountability when employees behave badly or break work rules

I need more time in my schedule to review Metro communications including emails, newsletters and bulletins

5

What else would you like to say about your top needs to improve your experience working at Metro? Or, please let us know about your top needs if they are not listed above. \*

Enter your answer

6

Who do you trust to help you solve a work concern or problem? Please rank the options from 1 to 10, where 1 indicates the highest level of trust and 10 indicates the lowest level of trust. \*

My direct supervisor

Human Resources

Metro Equal Employment Opportunity office

Leadership in my division

My family or friends who don't work for Metro

Close work friends

Employee Resource Group or Affinity Group

My union representative

I'm not sure who to turn to or trust

7

Which Metro Division do you work for? \*

Vehicle Maintenance

Bus Operations

Facilities

Rail

Marine

Other

8

What other changes or improvements would you like to see at Metro that could really make a difference for you? \*

Enter your answer

9

Do you manage or supervise staff? \*

- Yes
- No

10

Please check all that apply to you. \*

- I work in the trades.
- I work mostly at night or during the graveyard shift.
- I work in operations and rarely use a computer to get my work done.
- My work hours are usually around 8-5 on weekdays.
- I need to use a computer every day to get my work done.

13

What is your race/ethnicity? Please select all that apply.

- African/Black
- African American/Black
- Alaska Native/American Indian/Indigenous American/Native American
- Asian/Asian American
- South Asian/South Asian American
- Southeast Asian/Southeast Asian American
- Caribbean
- Caucasian/White
- Hispanic/Latina/Latino/Latinx
- Middle Eastern/North African
- Native Hawaiian/Pacific Islander
- I prefer not to say

14

If your race/ethnicity is not listed, please share here:

Enter your answer

Submit

## 2. Survey Data

This appendix offers an analysis of data from a survey of Metro’s operational divisions conducted April-September, 2024.

### 2.1 Demographics

Figure 10. Survey respondents by division.

Division	N
Bus Operations	65
Rail	41
Vehicle Maintenance	34
Facilities	28
Other	8
Marine	3
Unknown/Prefer not to say	3
<b>Total</b>	<b>182</b>

“Other” includes non-operational division employees. To preserve survey respondents’ anonymity, this analysis will only independently consider groups with N>5 when disaggregated. For that reason, Marine Division was not included in disaggregations by division.

Figure 11. Survey respondents by role.

Do you manage or supervise staff?	N
No	132
Yes	50
<b>Total</b>	<b>182</b>

These groups will be indicated by “Supervisors” and “Individual contributors.”

Figure 12. Survey respondents by gender.

Gender	N
Cisgender Women	157
Gender Expansive*	8
Cisgender Men	5
Transgender Women	4
Unknown/Prefer not to say	8
<b>Grand Total</b>	<b>182</b>

\* Gender Expansive does not include transgender women in this table.

Cisgender means that the participants’ gender identity and sex assigned at birth align, while transgender means their gender identity does not match the sex assigned at birth. When “women” or “all women” are referenced, these terms refer cumulatively to cisgender and transgender women. “Gender expansive” includes all employees who self-identify as transgender, non-binary, intersexual, or otherwise not cisgender. Transgender women are included in both “women” and “gender expansive” when those categories are analyzed separately.

Figure 13. Survey respondents by work environment.

Work Environment	N
Office/Admin	77
Trades/Field/Shift	105
<b>Grand Total</b>	<b>182</b>

“Trades/Field/Shift” includes those who chose any of the following answers:

- I work in the trades.
- I work mostly at night or during the graveyard shift.
- I work in operations and rarely use a computer to get my work done.

“Office/Admin” includes those for whom only one or both of the following statements are true:

- My work hours are usually around 8-5 on weekdays.
- I need to use a computer every day to get my work done.

Figure 14.a. Survey respondents grouped by race and ethnicity categories.

Race/Ethnicity	N
White/Caucasian	63
Black/African American/African	44
Asian/Asian American	22
More than one race or ethnicity identified	17
Native Hawaiian/Pacific Islander	6
Hispanic/Latino/Latina/Latinx	6
Alaska Native/American Indian/Indigenous American/Native American	3
Unknown/Prefer not to say	21
<b>Grand Total</b>	<b>182</b>

To preserve survey respondents’ anonymity, this analysis will only independently consider groups where N>5 when disaggregated by gender and supervisory role or work environment. For that reason, those who self-identify as Asian/Asian American, More than one race or ethnicity identified, Native Hawaiian/Pacific Islander, Hispanic/Latino/Latina/Latinx, and Alaska Native/American Indian/Indigenous American/Native American where grouped together.

Figure 14.b. Survey respondents grouped by more general race and ethnicity categories.

Race/Ethnicity	N
White	63
Other People of Color	54
Black	44
Unknown/Prefer not to say	21
<b>Grand Total</b>	<b>182</b>

2.2 Experience at Work: All Women

Figure 15. I feel safe at work: % of all women who agree or strongly agree by Race/Ethnicity, Role, and Work Environment.

	Black			Other Women of Color			White			Unknown/Prefer not to say			All		
	Agree & Strongly Agree	Total	%	Agree & Strongly Agree	Total	%	Agree & Strongly Agree	Total	%	Agree & Strongly Agree	Total	%	Agree & Strongly Agree	Total	%
All Metro women	19	43	44%	29	49	59%	32	55	58%	7	14	50%	87	161	54%
<b>By work environment</b>															
Office/Admin	9	17	53%	12	18	67%	20	27	74%	4	7	57%	45	69	65%
Trades/Field/Shift	10	26	38%	17	31	55%	12	28	43%	3	7	43%	42	92	46%
<b>By role</b>															
Individual Contributors	15	34	44%	17	33	52%	21	40	53%	4	10	40%	57	117	49%
Supervisors	4	9	44%	12	16	75%	11	15	73%	3	4	75%	30	44	68%

Fewer women who are individual contributors feel safe in the trades (46%) than in the office environment (65%). Supervisors are more likely (68%) than individual contributors (49%) to feel safe at Metro. Black women are less likely than White women (44% vs. 58%) to feel safe.

Figure 16. I feel like I can speak up or make a complaint without getting in trouble or fired: % of all women who agree or strongly agree by Race/Ethnicity, Role, and Work Environment.

	Black			Other Women of Color			White			Unknown/Prefer not to say			All		
	Agree & Strongly Agree	Total	%	Agree & Strongly Agree	Total	%	Agree & Strongly Agree	Total	%	Agree & Strongly Agree	Total	%	Agree & Strongly Agree	Total	%
All Metro women	21	43	49%	30	49	61%	31	55	56%	8	14	57%	90	161	56%
<b>By work environment</b>															
Office/Admin	10	17	59%	10	18	56%	16	27	59%	3	7	43%	39	69	57%
Trades/Field/Shift	11	26	42%	20	31	65%	15	28	54%	5	7	71%	51	92	55%
<b>By role</b>															
Individual Contributors	17	34	50%	18	33	55%	22	40	55%	5	10	50%	62	117	53%
Supervisors	4	9	44%	12	16	75%	9	15	60%	3	4	75%	28	44	64%

Overall, supervisors (64%) felt more comfortable than individual contributors (53%) speaking up. Black women were less likely to feel like they could speak up (49%) than White women (56%) or other Women of Color (61%). Black women supervisors were also much less likely to feel they could speak up (44%) compared to other supervisors of color (75%) or White supervisors (60%).

Overall, there were limited differences between the Office/Admin environment (57%) and the Trades/Field/Shift environment (55%). Black women were more likely to feel they can speak up in the office environment (59%) vs. in the trades, field, or on shift (42%). Conversely, other women of color are more likely to feel they can speak up in the trades (65%) vs the office environment (56%). White women were slightly more likely to feel they could speak up in the office (59%) vs. the trades (54%).

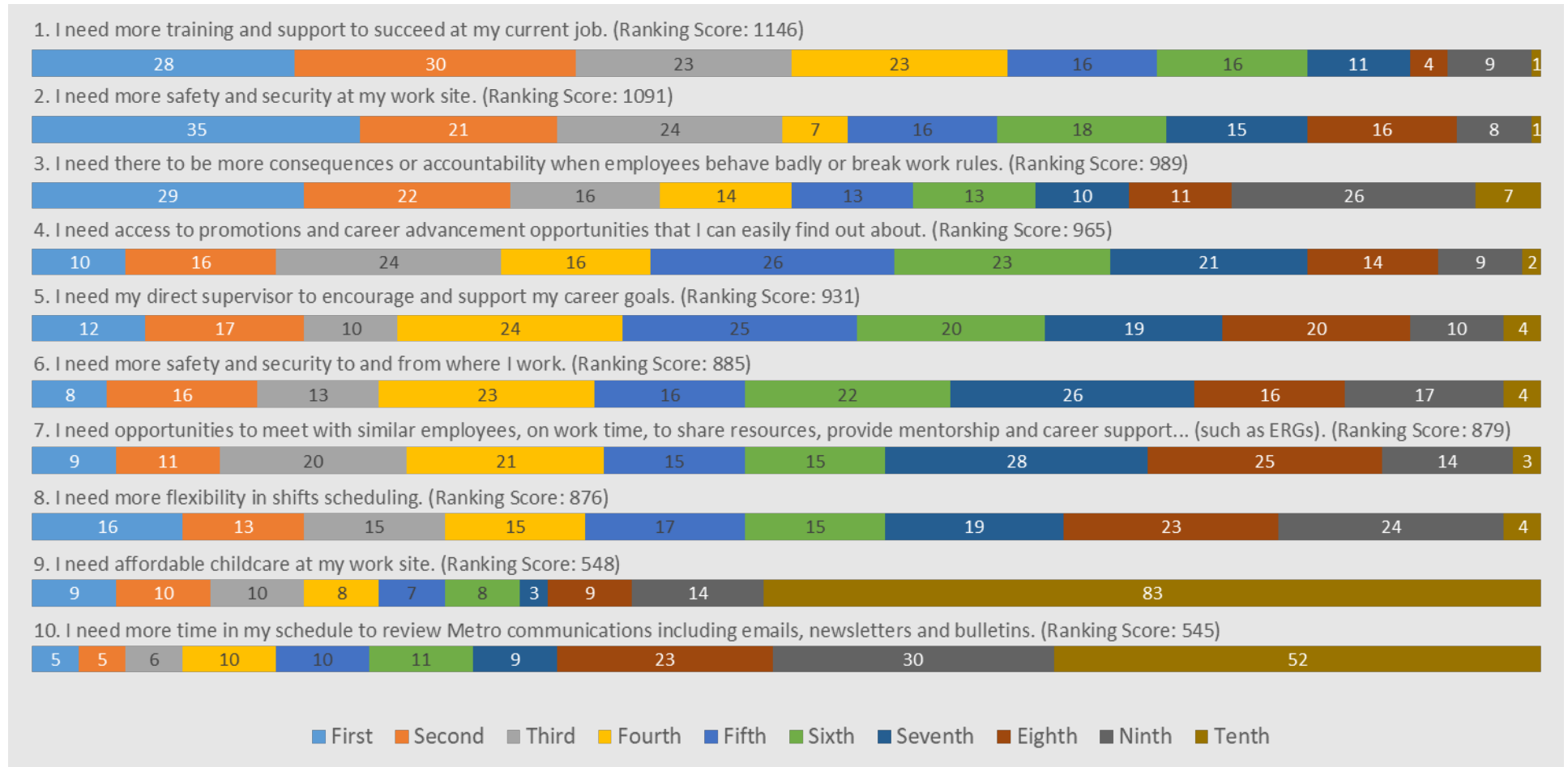
Figure 17. I feel like I'm treated fairly at work: % of all women who agree or strongly agree by Race/Ethnicity, Role and Work Environment.

	Black			Other Women of Color			White			Unknown/Prefer not to say			All		
	Agree & Strongly Agree	Total	%	Agree & Strongly Agree	Total	%	Agree & Strongly Agree	Total	%	Agree & Strongly Agree	Total	%	Agree & Strongly Agree	Total	%
All Metro women	21	43	49%	26	49	53%	32	55	58%	6	14	43%	85	161	53%
<b>By work environment</b>															
Office/Admin	11	17	65%	11	18	61%	20	27	74%	3	7	43%	45	69	65%
Trades/Field/Shift	10	26	38%	15	31	48%	12	28	43%	3	7	43%	40	92	43%
<b>By role</b>															
Individual Contributors	19	34	56%	18	33	55%	22	40	55%	4	10	40%	63	117	54%
Supervisors	2	9	22%	8	16	50%	10	15	67%	2	4	50%	22	44	50%

Individual contributors and supervisors generally have similar feelings about whether they are treated fairly (54% vs. 50%). When disaggregated by race and type of work, different patterns emerge. Those in the trades have generally worse feelings about fairness (43%) than those in the office environment (65%). Most Black women people leaders do not feel treated fairly (22%), especially compared to White women people leaders (67%).

2.3 Needs at Work: All Women

Figure 18a. Ranked choice ordering of needs at work by all Metro women respondents, N=161. The number of women ranking a need option first, second, third, etc., and their weighted ranking score.



All these options were ranked relatively highly. While the extremes (top two and lowest two) are more evident, the options ranked three through eight only range by 113 ranking score points (989 vs. 876), a difference of only 13%.

Figure 18b. Metro Women's ranking of top needs by Race/Ethnicity, Supervisory Role, and Work Environment.

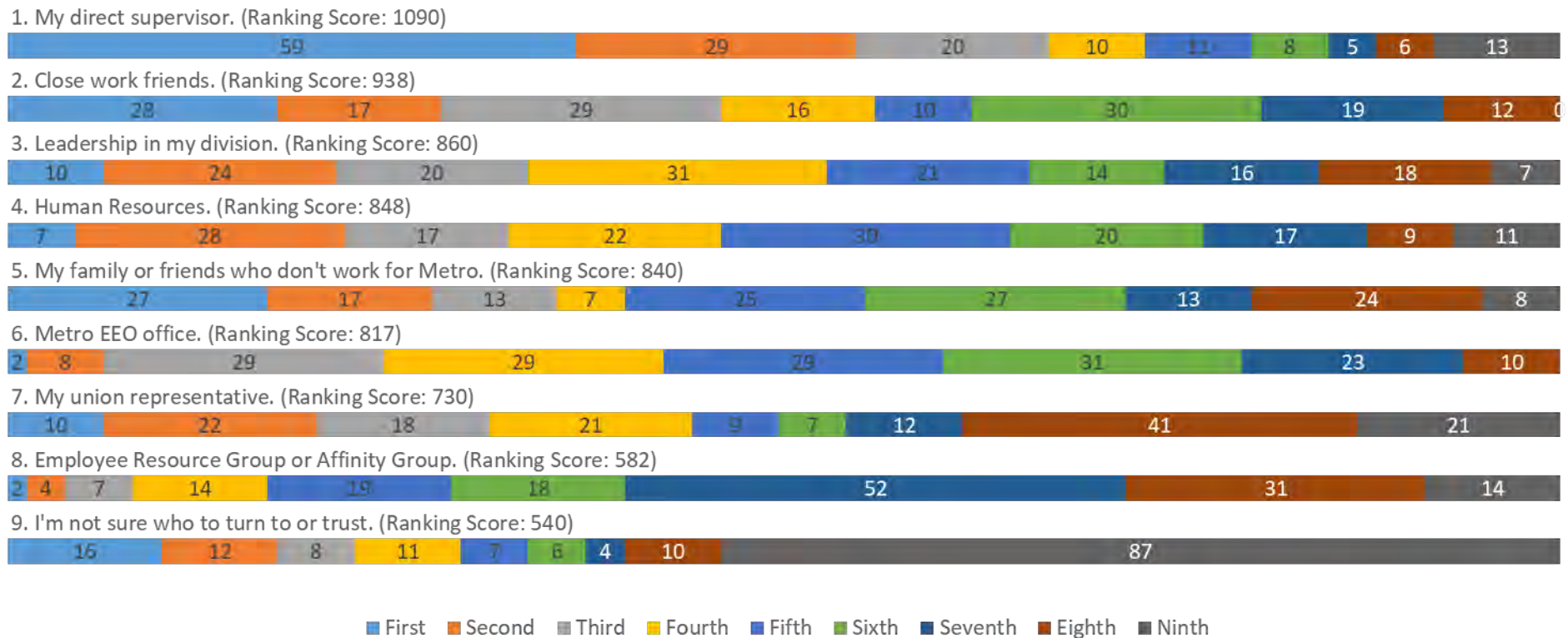
Legend:  
 Dark Green=Ranked first  
 Light Green=Ranked second  
 Yellow=Ranked third  
 Orange=Ranked fourth

	n	I need more training and support to succeed at my current job	I need more safety and security at my work site	I need there to be more consequences or accountability when employees behave badly or break work rules	I need access to promotions and career advancement opportunities that I can easily find out about	I need my direct supervisor to encourage and support my career goals	I need more flexibility in shifts scheduling	I need opportunities to meet with similar employees, on work time, to share resources, provide mentorship and career support for each other (such as an Employee Resource Group)	I need more safety and security to and from where I work	I need more time in my schedule to review Metro communications including emails, newsletters and bulletins	I need affordable childcare at my work site
<b>All Women</b>	161	1	2	3	4	5	8	7	6	10	9
<b>Supervisors</b>	44	1	2	3	4	7	8	5	6	10	9
<b>Individual contributors</b>	117	1	2	4	3	5	7	8	6	9	10
<b>Trades/Field/Shift</b>	92	2	1	3	4	7	6	8	5	10	9
<b>Admin/Office</b>	69	1	6	4	3	2	7	5	8	9	10
<b>Admin/Office, Supervisors</b>	21	1	2	4	6	7	5	2	8	9	10
<b>Admin/Office, Individual contributors</b>	48	1	6	4	3	2	7	5	8	9	9
<b>Trades/Field/Shift, Supervisors</b>	23	1	2	3	4	6	7	8	5	10	9
<b>Trades/Field/Shift, Individual contributors</b>	69	2	1	3	4	7	6	8	5	9	10
<b>Black Women</b>	43	1	2	7	3	4	8	6	5	9	10
<b>Black -- Supervisors</b>	9	1	5	4	2	3	8	5	7	9	10
<b>Black -- Individual contributors</b>	34	2	1	8	3	4	7	6	5	9	10
<b>Black -- Trades/Field/Shift</b>	26	2	1	5	3	6	8	7	4	9	10
<b>Black -- Admin/Office</b>	17	1	4	8	2	3	6	5	7	9	10
<b>Other Women of Color (WOC)</b>	49	1	2	4	5	8	3	6	7	10	9
<b>Other WOC -- Supervisors</b>	16	1	2	4	6	8	3	5	7	10	9
<b>Other WOC -- Individual contributors</b>	33	1	2	4	7	5	3	8	5	10	9
<b>Other WOC -- Trades/Field/Shift</b>	31	3	1	4	5	7	2	8	6	10	9
<b>Other WOC -- Admin/Office</b>	18	1	5	3	6	4	8	2	6	10	9
<b>White Women</b>	55	2	3	1	5	4	8	7	6	9	10
<b>White -- Supervisors</b>	15	1	2	3	8	4	4	7	6	9	10
<b>White -- Individual contributors</b>	40	3	2	1	4	5	8	6	7	9	10
<b>White -- Trades/Field/Shift</b>	28	3	1	2	4	5	8	7	6	9	10
<b>White -- Admin/Office</b>	27	1	3	2	6	4	5	8	7	9	10

Most women at Metro prioritize more training and support to succeed at their current job. Black women prioritize access to promotions and career advancement opportunities more than other women of color or White women respondents. White women prioritize accountability and consequences more highly than other women. Women in the trades prioritize safety at the worksite more highly than those in the office environment, although it is a priority for both.

### 2.4 Trust at Work: All Women

Figure 19a. Ranked choice ordering of those trusted at work by all Metro women respondents, N=161. The number of women ranking a need option first, second, third, etc., and their weighted ranking score.



There was substantial agreement about direct supervisors being the most trusted.

Figure 19b. Metro Women's ranking of who they trust by Race/Ethnicity, Supervisory Role, and Work Environment.

Legend:  
 Dark Green=Ranked first  
 Light Green=Ranked second  
 Yellow=Ranked third  
 Orange=Ranked fourth

	n	My direct supervisor	Close work friends	Leadership in my division	Human Resources	My family or friends who don't work for Metro	Metro EEO office	My union representative	Employee Resource Group or Affinity Group	I'm not sure who to turn to or trust
<b>All Women</b>	161	1	2	3	4	5	6	7	8	9
<b>Supervisors</b>	44	1	4	2	3	5	6	7	8	9
<b>Individual contributors</b>	117	1	2	4	4	3	6	7	9	8
<b>Trades/Field/Shift</b>	92	1	2	4	5	7	6	3	9	8
<b>Admin/Office</b>	69	1	2	5	4	2	6	8	7	9
<b>Admin/Office, Individual contributors</b>	48	1	2	6	4	3	5	8	7	9
<b>Admin/Office, Supervisors</b>	21	1	5	2	3	4	6	8	7	9
<b>Trades/Field/Shift, Individual contributors</b>	69	1	2	4	7	5	6	3	9	8
<b>Trades/Field/Shift, Supervisors</b>	23	1	3	4	2	6	5	7	8	9
<b>Black Women</b>	43	1	4	5	2	6	3	7	8	9
<b>Black -- Supervisors</b>	9	1	5	3	6	2	4	8	7	9
<b>Black -- Individual contributors</b>	34	1	3	5	2	6	4	7	8	9
<b>Black -- Trades/Field/Shift</b>	26	1	2	7	3	4	5	6	9	8
<b>Black -- Admin/Office</b>	17	1	5	4	2	6	3	8	7	9
<b>Other Women of Color (WOC)</b>	49	1	2	4	3	5	5	7	8	9
<b>Other WOC -- Supervisors</b>	16	1	5	3	2	6	4	7	7	9
<b>Other WOC -- Individual contributors</b>	33	1	2	3	6	4	7	4	8	9
<b>Other WOC -- Trades/Field/Shift</b>	31	1	4	2	3	7	6	5	8	9
<b>Other WOC -- Admin/Office</b>	18	1	3	5	4	2	6	8	7	9
<b>White Women</b>	55	1	2	3	6	4	5	7	9	8
<b>White -- Supervisors</b>	15	1	3	2	4	5	6	7	8	9
<b>White -- Individual contributors</b>	40	1	2	4	6	3	5	6	9	8
<b>White -- Trades/Field/Shift</b>	28	1	2	4	8	5	6	3	9	7
<b>White -- Admin/Office</b>	27	1	4	2	5	3	6	8	7	9

Even when disaggregated, all groups trusted their direct supervisor over other options. Individual contributors in the trades, field, or on shift ranked their union representative more highly than other groups. Black women ranked the Metro EEO Office more highly than other groups. White women ranked Human Resources lower than Black women or other women of color.

2.5 Gender Expansive Employees

Twelve employees self-identified as transgender, non-binary, intersexual, or otherwise not cisgender. To protect their anonymity, this group is not disaggregated further by race/ethnicity, supervisory role, or work environment. Their responses to the survey questions are shared below and compared to cisgender women’s responses (N=157).

Figure 20. I feel safe at work: Gender Expansive and Cis Gender Women respondents.

Gender expansive respondents were less likely to feel safe at work than cisgender women. The majority of both groups did not feel safe.

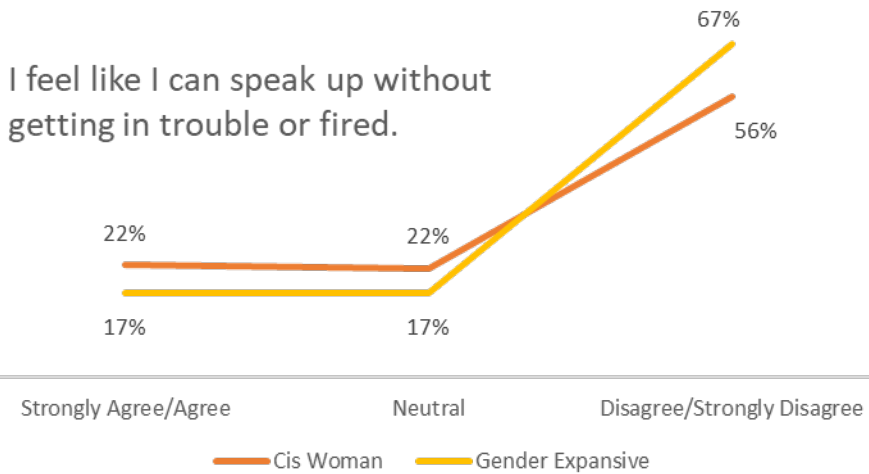
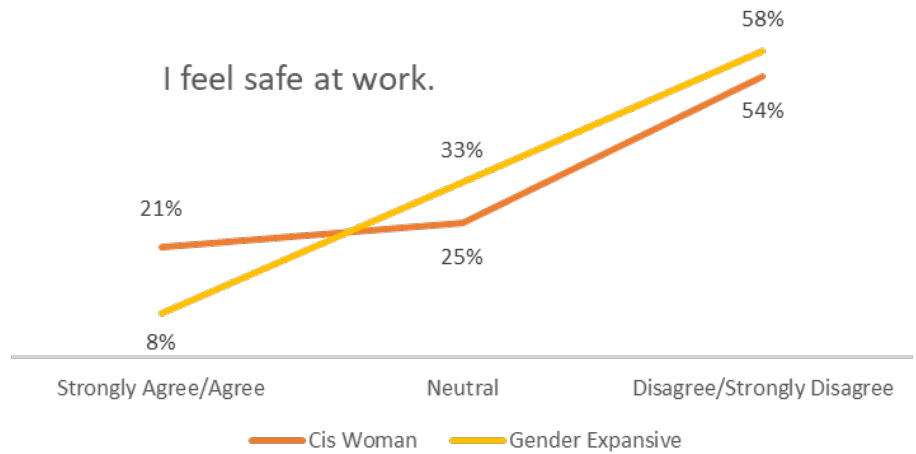


Figure 21. I feel like I can speak up without getting in trouble or fired: Gender Expansive and Cis Gender Women respondents.

Gender expansive people are less likely than cisgender women to feel they can speak up or make a complaint. The majority of both groups did not feel they could speak up.

Figure 22. I feel like I'm treated fairly at work: Gender Expansive People and Cisgender Women respondents.

The majority of both groups disagree that they are treated fairly. Gender expansive people are more likely to agree that they are treated fairly at work than cis women.

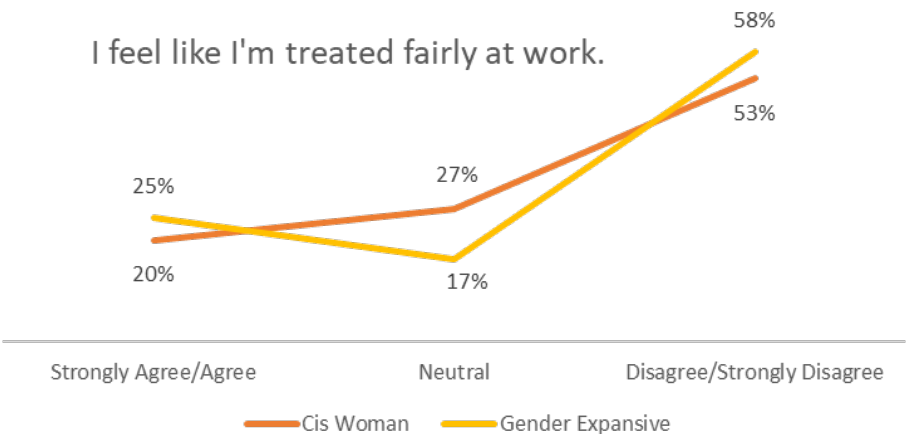
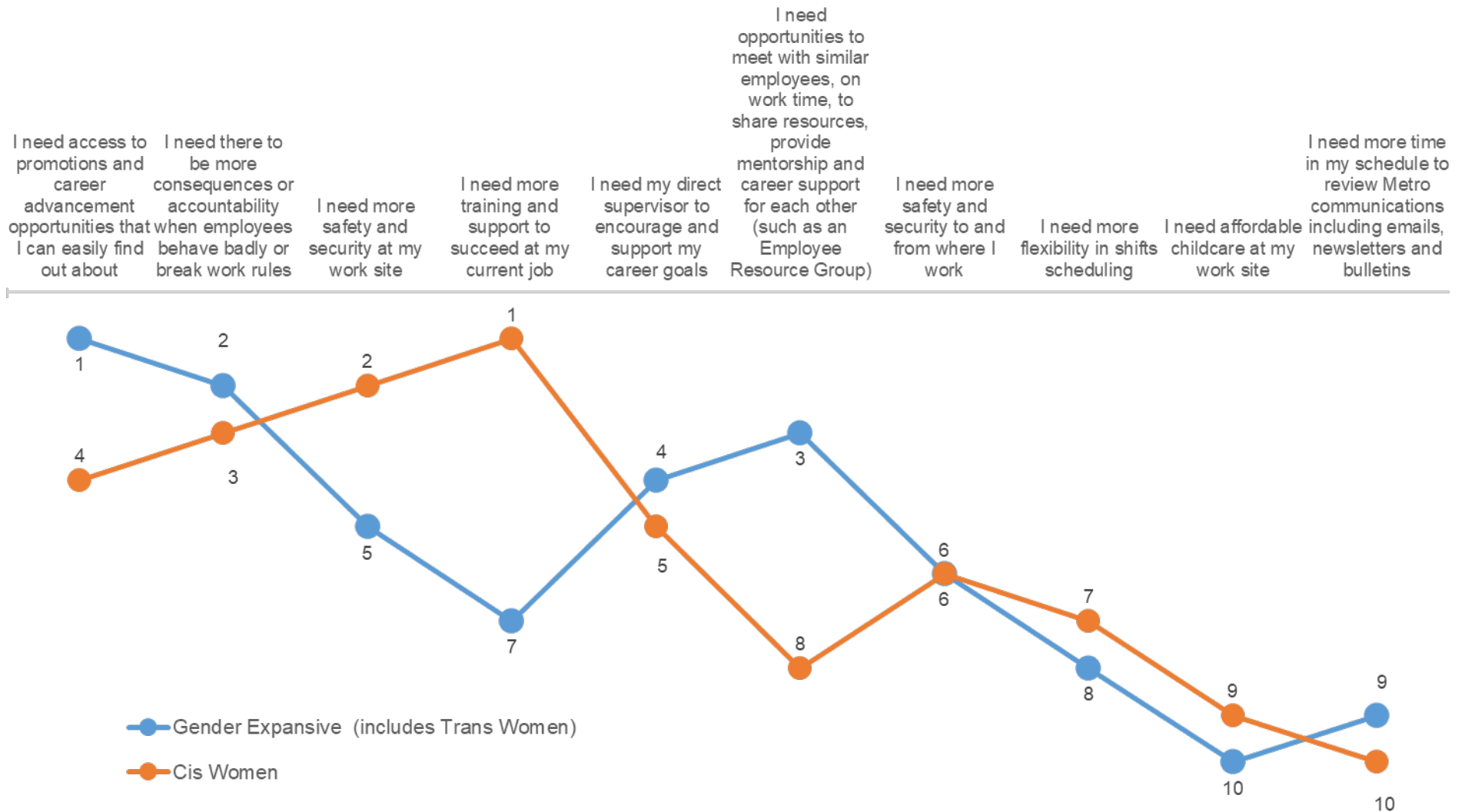
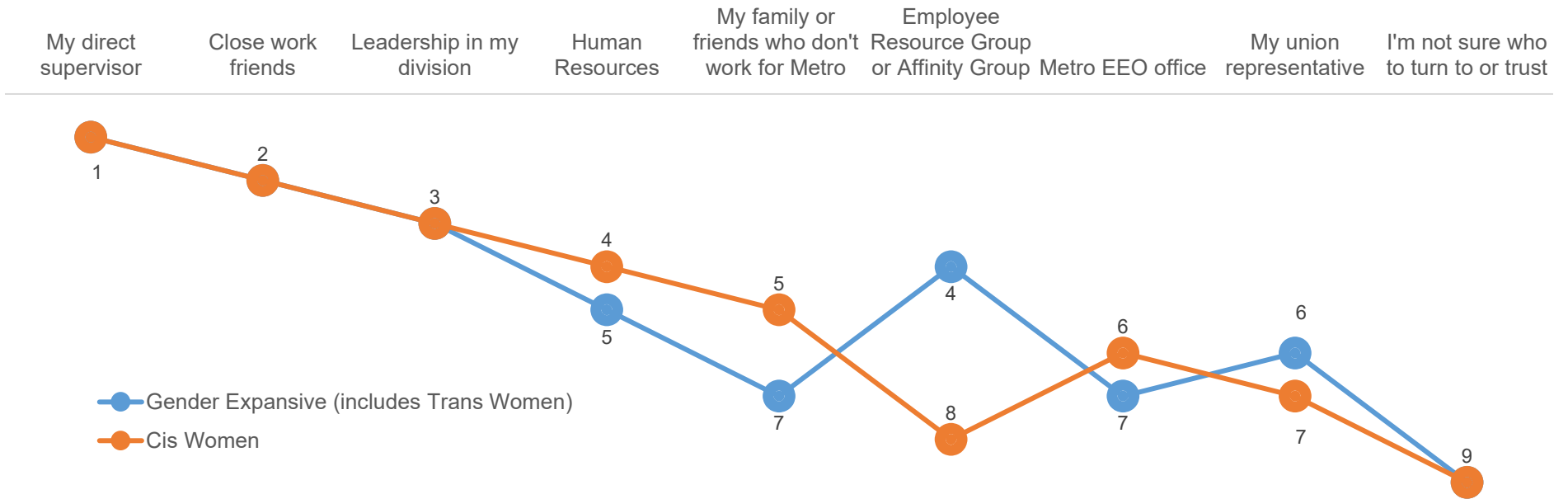


Figure 23. Ranking of top needs by Gender Expansive People (N=12) and Cisgender Women (N=157).



Gender expansive employees value access to promotions and career advancement more highly, ranking it in first place, compared to cisgender women who rank it fourth. The two most highly ranked needs by cisgender women—more training and support to succeed at my current job and more safety and security at my work site—are not as highly prioritized by gender expansive employees. Gender expansive employees prioritize opportunities such as ERGs much more highly, at third, than cisgender women, who rank it eighth.

Figure 24. Ranking of those trusted at work by Gender Expansive People (N=12) and Cisgender Women (N=157).

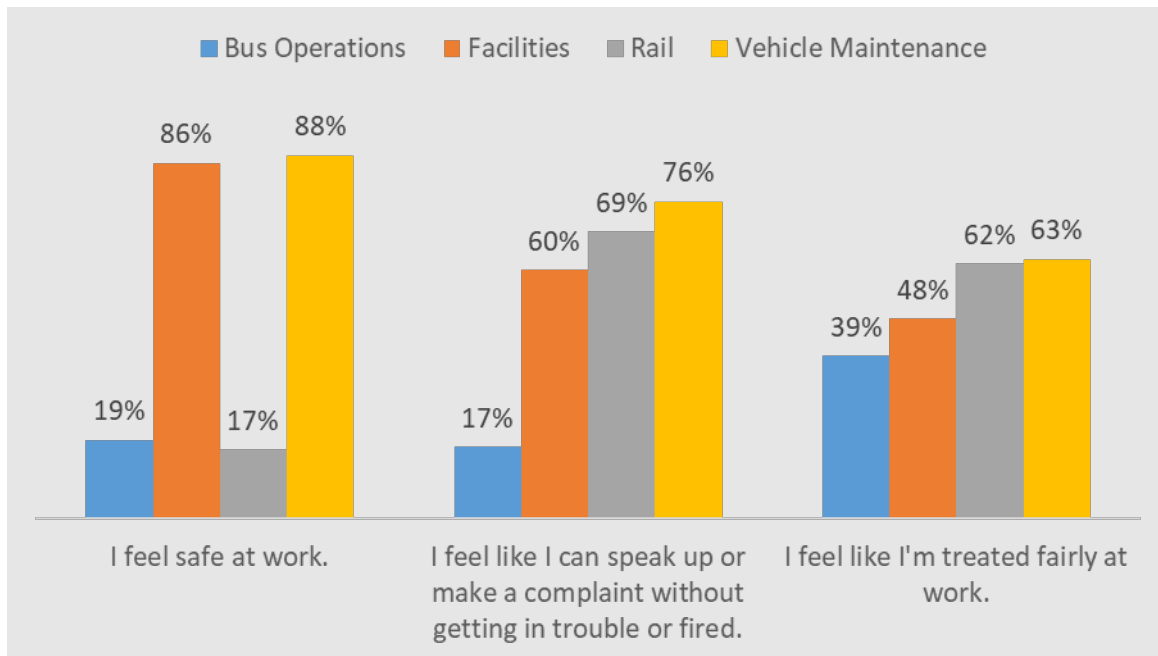


Gender expansive employees and cisgender women align on how they prioritize their top three choices for who to trust: direct supervisor, close work friends, and division leadership. Consistently, gender expansive employees value ERGs higher (fourth) than Cisgender women, who rank it eighth.

## 2.6 By Division

The following analysis is of all women (cisgender and transgender) in operational divisions at Metro. The Marine Division was excluded to preserve the anonymity of respondents.

Figure 25. Percentage of women\* employees in each operational division\*\* who agree or strongly agree with each statement, N=161.



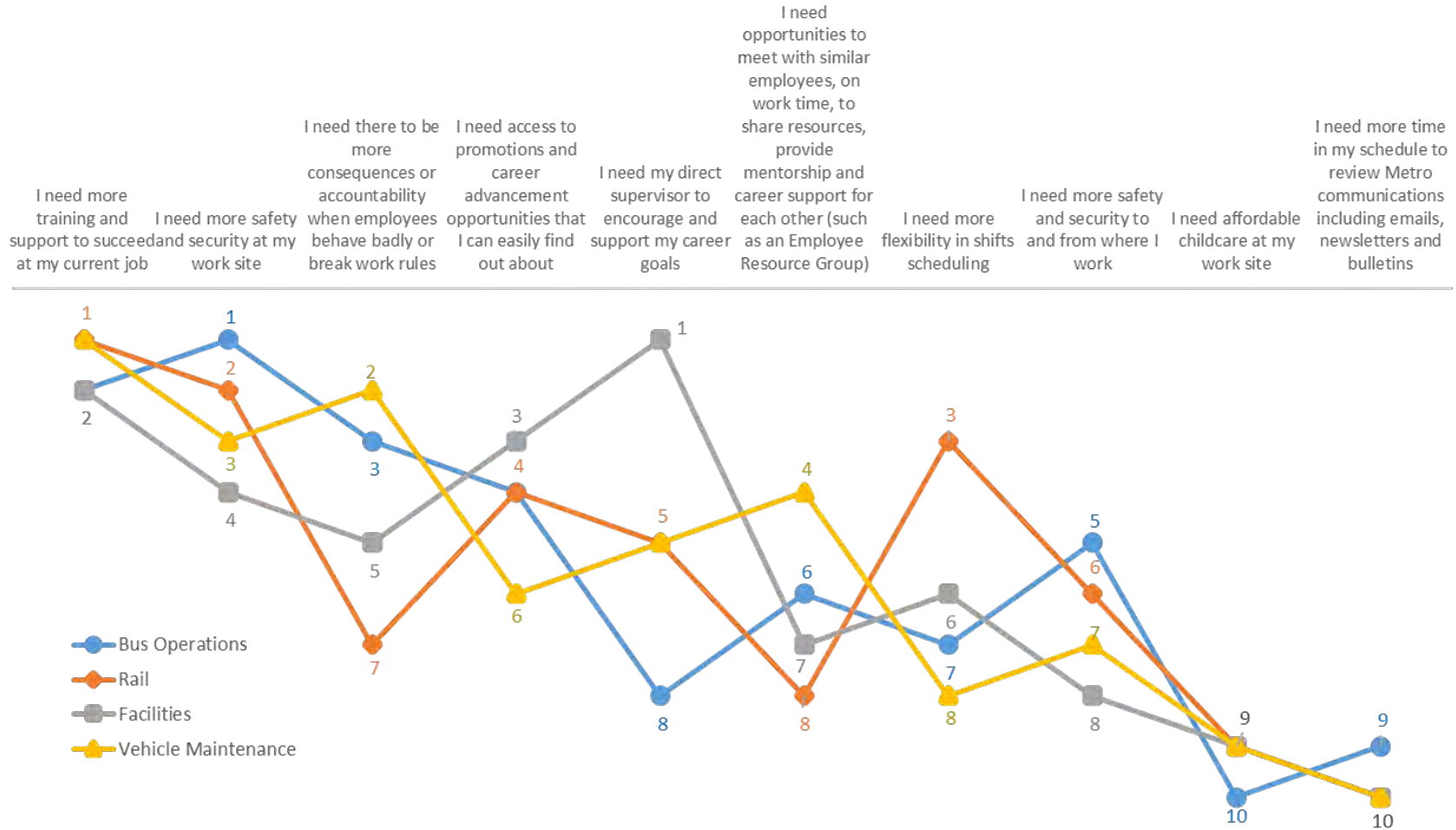
\* Includes both cisgender and transgender women.

\*\* The Marine Division was excluded to preserve the anonymity of respondents.

Women in the Facilities and Vehicle Maintenance divisions agreed they felt safe at a much higher rate than those in the Bus Operations and Rail divisions. Fewer women in Bus Operations feel comfortable speaking up (17%) than in other divisions (60%, 69%, 76%).

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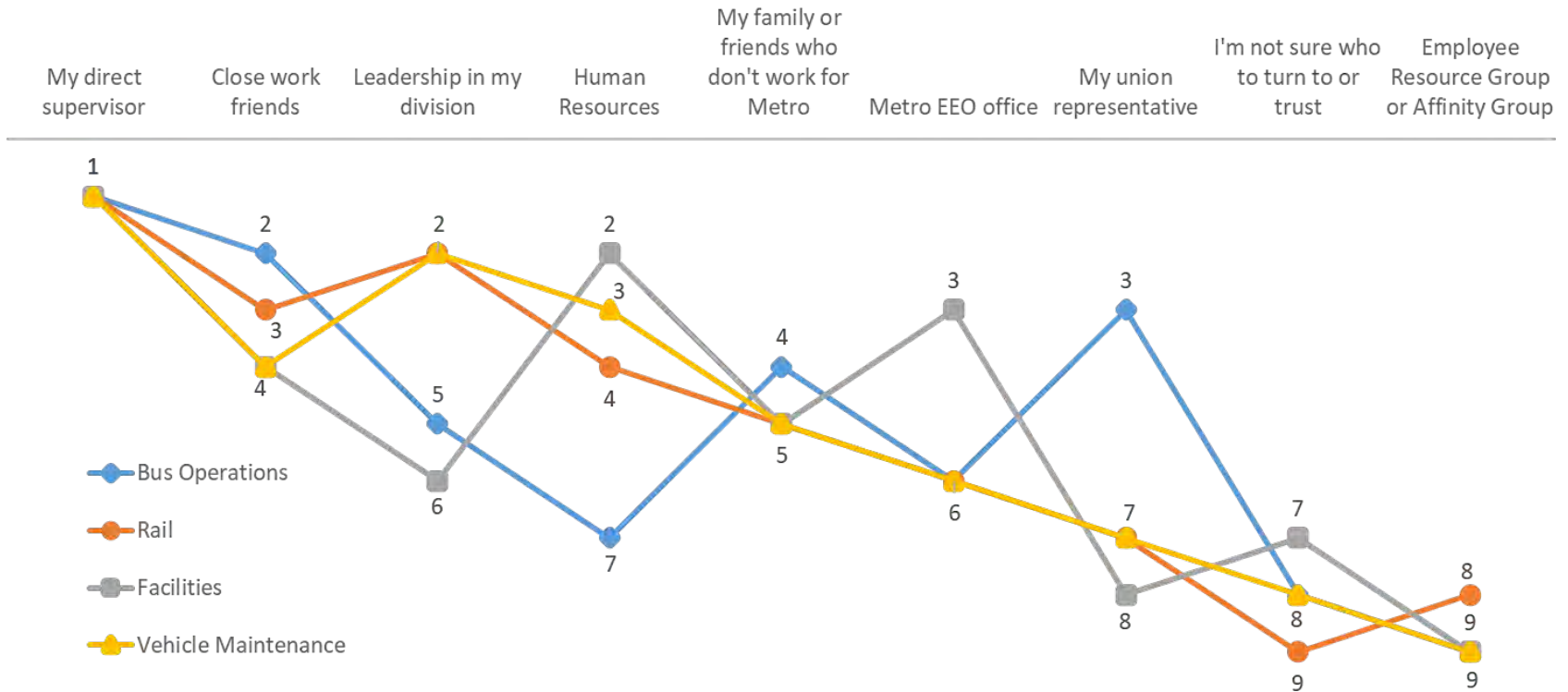
Figure 26. Ranking of Top Needs by All Women and Operational Division, N=154.



A large majority of women in all divisions prioritize training and support in their current job (1,1,2,2). Women in Facilities prioritize encouragement and support from their direct supervisors (1) more highly than other divisions (5,5,8). Women in Bus Operations and Rail prioritize safety at their work site more highly (1,2), although it is a priority in all divisions (3,4). Women in Rail prioritize flexibility in shifts scheduling (3) more highly than other divisions (6,7,8). Women in Vehicle Maintenance (2) and Bus Operations (3) prioritize consequences or accountability more highly than those in Rail (7) and Facilities (5).

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Figure 27. Ranking of Those Trusted at Work by All Women and Operational Division, N=154.



Women in all divisions highly trust their direct supervisor for help at work (1,1,1,1). Women in Bus Operations rank their union representative more highly (3) than other divisions (7,7,8) and rank Human Resources less highly (7) than other divisions (2,3,4). Women in Facilities trust the Metro EEO Office more highly (3) than other divisions (6,6,6). Women in Rail (2) and Vehicle Maintenance (2) rank their trust in their division leadership more highly than those in Bus Operations (5) and Facilities (6).

3. Sample Goals & Commitments Template

<b>Areas of Opportunity</b>	<b>Short Term Goals</b> (these can include efforts that are already underway that may need more visibility) (Date)	<b>Medium Term Goals</b> (Date)	<b>Long Term Goals</b> (Date)
<b>Workplace Health &amp; Safety</b>	<ul style="list-style-type: none"> <li>• People managers to conduct safety and wellbeing check-ins with their direct reports and ensure action plans are developed with their direct reports to best meet the needs of individual employees</li> <li>• Audit/evaluate current security effectiveness and outcomes including analyzing current training and competence of contracted security personnel.</li> <li>• Develop and post Rights and Responsibilities of Metro passengers communications in all customer-facing spaces</li> <li>• Provide more parking options and/or security in reserved lots.</li> </ul>	<ul style="list-style-type: none"> <li>• Establish standard operating procedures relating to how to interact with members of the public who are unhoused, have mental illness, substance use disorder, that contribute to health or safety concerns</li> <li>• Offer trainings on mental illness, substance use disorder, de-escalation tactics in alignment with the above SOPs</li> </ul>	<ul style="list-style-type: none"> <li>• Conduct comprehensive evaluations of security/incident protocol for Bus Operations, Rail (Sound Transit), Marine, and Facilities' divisions. Bring a representative sample of affected and interested parties for collaborative problem solving (eg. For Bus Operations: TCC, Supervisors, Security contractor, SSQA, law enforcement, senior leaders, operators)</li> <li>• Increase King County Law Enforcement presence to pre-pandemic levels and replace security contractors where determined to be ineffective based on above recommended evaluation.</li> </ul>
<b>Support &amp; Training in Current Job</b>			

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<b>Performance Management &amp; Workplace Bullying &amp; Other Inappropriate Conduct</b>			
<b>Equitable Pathways to Career Advancement</b>			
<b>Reduce Workplace Bias &amp; Improve Gender Equity Outcomes</b>			

# Attachment 14: Metro ERGs and How to Enter Time to Attend



# METRO EMPLOYEE RESOURCE GROUP **FAQS**

## What are ERGs and who leads them?

ERGs focus on protected categories of people as defined by law. They are employee-led groups that address racism and other forms of oppression to advance the county's equity and social justice goals.

## What can I expect at an ERG?

An inclusive environment where all are valued and empowered to succeed and:

- Promote equity and social justice
- Strengthen workplace effectiveness
- Foster employee engagement
- Enhance personal and professional growth

## How do I join or start an ERG?

Scan the QR code at the bottom to join an ERG or to start your own.

## Do I get paid for my time?

All Metro employees who are interested in participating in a Metro or King County ERG should speak with their supervisors to request approval for paid participation up to 3 hours per month. ERG participation time should be recorded on timesheets using the project/task codes available for each Metro work group as outline in the next question.

## How do I enter my time?

Bus Operations	In Hastus, use the code <b>ERG</b> , which stands for Project <b>1137368</b> , with the employee's default pay cost center. Dispatch should enter this in Hastus for Operators. Non-operators should use Project <b>1137368</b> in Peoplesoft.
Vehicle Maintenance	In M5, use work order <b>24EMPGRP</b> and the <b>job code for your base 35-M1-XXX</b> .
Facilities	Use: Project <b>1027012</b> , Org <b>464xxx</b> (where <b>xxx</b> is your home cost center), Expenditure Type 51110, Task – 00.610.464220
Marine Division	Use: Project <b>1137368</b> , Task <b>424501</b> for Management and Admin, <b>464502</b> for Shoreside Operations, <b>464503</b> for Vessel Maintenance, and <b>464504</b> for Vessel Operations
Rail Division	Use: Project <b>1137368</b> , Task <b>464xxx</b> (where <b>xxx</b> are the last three digits of your home cost center)
Capital Division	
Mobility Division	



[kingcounty.gov/metro/erg](http://kingcounty.gov/metro/erg)



[metroEIB@kingcounty.gov](mailto:metroEIB@kingcounty.gov)



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