



I. AFFIRMATIVE ACTION PROGRAM FOR WOMEN AND MINORITIES

West Central Mass Transit District
Company

WCMTD
Establishment

1120 W Walnut Street
Street Address

Jacksonville, IL 62650
City and State

Inclusive Dates of the AAP: **July 1, 2018 to June 30, 2019**

Program Completed by: **Jeanne Klingler, Human Resource Manager**

Telephone Number: **217-245-2900**

TABLE OF CONTENTS

Confidentiality of Records

Preliminary Statement

Compliance with the Sex Discrimination Guidelines *41 CFR 60-20*

Compliance with Religion or National Origin Guidelines of *41 CFR 60-50*

Responsibilities for Implementation *41 CFR 60-2.17(a)*

Race and Sex Codes

EEO-1 Job Categories

Problem Areas *41 CFR 60-2.17(b)*

Action Oriented Programs *41 CFR 60-2.17(c)*

Audit and Reporting *41 CFR 60-2.17(d)*

CONFIDENTIALITY OF RECORDS

This affirmative action program contains confidential, trade secret and commercial information protected from disclosure by the Office of Federal Contract Compliance Programs pursuant to 18 U.S.C. 1905. In addition, exemptions 3 and 4 of the Freedom of Information Act (FOIA) protect information in this document from mandatory disclosure to FOIA requestors. See, e.g., *Chrysler v. Brown*, 441 U.S. 281 (1979). The release of any trade secret, confidential statistical or commercial information would be arbitrary and capricious in violation of the Administrative Procedure Act. See, e.g., *CAN Financial Corp. v. Donovan*, 830 F.2d 1132, 1144 and N.73 (D.C. Cir.), cert. Denied, 485 U.S. 977 (1988).

If supplied to a public official or representative of a governmental agency, whether pursuant to review proceedings or otherwise, it is understood that it is for review only, or examination for authorized purposes and may not be retained, copied or made available to others without receipt of express written permission of a duly authorized representative of our firm.

PRELIMINARY STATEMENT

This affirmative action program has been voluntarily prepared as a reaffirmation of the company's commitment to equal employment opportunity and affirmative action. In preparation of the Program, the terminology used in Executive Order 11246 and its implementing regulations has been used as a guide. Therefore, the use of such terms as "placement goal", "expected number", "problem area", "utilization", "distribution", etc., should not be construed as an admission that in fact either minorities or women have been or presently are being discriminated against in any way in violation of federal, state or local fair employment practice laws. Further, nothing contained in this material or the data supporting this program should be construed as an admission that any such federal, state or local fair employment practice laws have been contravened.

In developing and implementing this program, the company has been guided by its established policy of providing equal employment opportunity. Any goals, which are established herein, are not intended as rigid, inflexible quotas that must be met, but rather as targets reasonably attainable by applying every good faith effort in implementing its affirmative action program. The use of goals in this program is not intended to discriminate against any individual or group of individuals with respect to any employment opportunity for which they are qualified on the grounds that they are not the beneficiaries of affirmative action themselves. Nothing herein is intended to sanction the discriminatory treatment of any person. Thus, this plan has been developed in strict reliance upon the affirmative action guidelines issued by the Equal Employment Opportunity Commission (EEOC) and the regulations issued by the Department of Labor's Office of Federal Contract Compliance Programs (OFCCP).

COMPLIANCE OF PERSONNEL POLICIES AND PRACTICES
WITH THE SEX DISCRIMINATION GUIDELINES
41CFR 60-20

The company's personnel policies and practices are monitored to ensure that they are in keeping with the letter and spirit of applicable EEO regulations and the affirmative action program. It is expressly stated that there shall be no discrimination against any employee or applicant on account of sex.

It is the policy of this company to recruit employees of both sexes for all jobs. Newspaper and other media advertisements for employment opportunities do not express a gender preference and in fact carry an affirmative action statement.

When dealing with a bargaining unit for employees, if there is a written agreement on conditions of employment, such agreement does not contain language that is discriminatory on the basis of sex. The company insists that employees of both sexes have equal opportunities to any available job that he or she is qualified to perform. The company and this facility have instituted personnel policies and practices which ensure that employment opportunities, wages, hours, or other conditions of employment are not discriminatory to either sex; this includes employer contributions for insurance, pensions, and other similar group benefits.

There is no distinction between married and unmarried persons of one sex that is not made between married and unmarried persons of the opposite sex. Employment is not denied to women with young children. Employees of one sex are not given any preferential treatment over the other sex in cases of termination, layoff or other similar actions. Physical facilities are made available to employees of both sexes. The company does not follow any state guidelines on sex limitations if they are contrary to federal regulations issued by appropriate compliance agencies. Women are not denied particular jobs because of any state "protective" laws.

Female employees are not penalized in their conditions of employment because they require time away from work on account of childbearing. Women are granted medical leaves of absence upon evidence from the woman and her physician that she is pregnant. The start of the medical leave is left up to the employee and her physician. The female employee on medical leave is entitled to return to work to her former position or a position similar in status and wages for which she is eligible. She continues to accrue credited service while on leave.

The company pension program provides no age distinction for male or female employees in either mandatory or optional retirement. Neither wage and salary scales nor seniority lists are related to or based upon the sex of employees.

**COMPLIANCE OF PERSONNEL POLICIES WITH GUIDELINES ON
DISCRIMINATION BECAUSE OF RELIGION OR NATIONAL ORIGIN**
41 CFR 60-50

Discrimination in any term or condition of employment with the company on the basis of religion and/or national origin has always been and will continue to be prohibited.

As such, we do not seek or request information regarding the religious beliefs and/or national origin from any employee or applicant.

This policy is published and publicized internally and externally. Internally, our policy prohibiting discrimination on the basis of religion and national origin is included in all posted Equal Employment Opportunity policy statements. Similarly all recruiting sources are directed to refer applicants without regard to religion or national origin.

In keeping with this policy, reasonable accommodations are made for individual religious observances and practices unless such an accommodation would impose an undue hardship on the conduct of our business. Generally, we will try to make reasonable accommodations to the religious observances and practices of any employee who regularly observes Friday evening and Saturday, or some other day of the week, as Sabbath and/or who observes certain religious holidays during the year and is conscientiously opposed to performing work or engaging in similar activity on such days. In determining the extent of the hardship imposed, we may consider business necessity, financial costs and expenses, and employee relations.

RESPONSIBILITIES FOR IMPLEMENTATION OF
EEO POLICY
41 CFR 60-2.17(a)

With the support of senior management, Jeanne Klingler, Human Resource Manager , has overall primary responsibility for implementation of the company's EEO policy and affirmative action program. All employees are responsible to cooperate with this person and act in accordance with the prescribed policies and procedures. All members of management are familiar with the policy, fully support it, and apply these principles in good faith.

To ensure compliance with the Equal Employment Opportunity policy and affirmative action program, Jeanne Klingler, and/or designated staff, will as appropriate:

1. Develop policy statements and internal and external modes of communication;
2. Conduct regular discussions with managers, supervisors, and other employees to be certain the company's policies are being followed;
3. Advise supervisors that they are responsible for complying with company policies;
4. Implement audit and reporting systems that will measure the effectiveness of the affirmative action program, identify the need for action areas, determine the degree to which the company's goals and objectives have been attained, and ensure that the company is in compliance with applicable employment laws and regulations;
5. Advise management regarding the effectiveness of the affirmative action program and offer suggestions for remedial action if warranted;
6. Keep management informed of the latest developments in the areas of affirmative action and equal employment opportunity.

RACE & SEX CODES

1. **White (not Hispanic or Latino)** – A person having origins in any of the original peoples of Europe, North Africa, or the Middle East.
2. **Black or African American (not Hispanic or Latino)** - A person having origins in any of the Black racial groups of Africa.
3. **Hispanic or Latino** – A person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.
4. **Asian (not Hispanic or Latino)** – A person having origins in any of the original peoples of the Far East, Southeast Asian, or the Indian Subcontinent including for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
5. **American Indian or Alaskan Native (not Hispanic or Latino)** – A person having origins in any of the original peoples of North America and South America (including Central America), and who maintains tribal affiliation or community attachment.
6. **Native Hawaiian or Other Pacific Islander (not Hispanic or Latino)** – A person having origins in any of the peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
7. **Two or More Races** – All persons who identify with more than one of the above five races.

SEX CODES

M **Male** **F** **Female**

EEO-1 JOB CATEGORIES

- 1.1 **Executive/Senior Level Officials and Managers** – Individuals who plan, direct and formulate policies, set strategy and provide the overall direction of organizations. Example: chief executive officers, chief operating officers, chief financial officers, line of business heads, presidents or executive vice presidents, chief information officers, chief HR officers, chief marketing officers, chief legal officers, management directors and managing partners.
- 1.2 **First/Mid Level Officials and Managers** – Managers other than Executive/Senior Level. Managers who lead major business units implementing policies, programs, and directives of executive/senior managers through subordinate managers. Example: VPs and directors; group, regional or divisional controllers; treasurers; human resources, information systems, marketing, and operations managers. Those who report directly to middle managers are also included. These individuals serve at functional, line of business segment or branch levels and are responsible for directing and executing day-to-day operational objectives. Example: first-line, team, unit, operations & production, branch, administrative services, purchasing & transportation, storage & distribution, call center or customer service, technical support, and brand or product managers.
2. **Professional** – Jobs requiring bachelor or graduate degrees and/or professional certification or comparable experience. Example: accountants & auditors; airplane pilots & flight engineers; architects; artists; chemists; computer programmers; designers; dietitians; editors; engineers; lawyers; librarians; mathematical scientists; natural scientists; registered nurses; physical scientists; physicians & surgeons; social scientists; teachers; and surveyors.
3. **Technicians** – Jobs requiring applied scientific skills usually obtained by post-secondary education of varying lengths. Example: drafters; emergency medical technicians; chemical technicians; and broadcast & sound engineering technicians.
4. **Sales Workers** – Non-managerial activities that wholly or primarily involve direct sales. Example: advertising sales agents; insurance sales agents; real estate brokers & sales agents; wholesale sales representatives; securities, commodities, and financial services sales agents; telemarketers; demonstrators; retail salespersons; counter and rental clerks; and cashiers.
5. **Administrative Support Workers** – Jobs involving non-managerial tasks providing administrative and support assistance, primarily in office settings. Example: office & administrative support workers; bookkeeping, accounting & auditing clerks; cargo & freight agents; dispatchers; couriers; data entry keyers; computer operators; shipping, receiving & traffic clerks; work processors & typists; proofreaders; desktop publishers; and general office clerks.
6. **Craft Workers** – Higher skilled occupations in construction (building trades craft workers and their formal apprentices) and natural resource extraction workers; jobs related to the installation, maintenance and part replacement of equipment, machines & tools; and some production occupations that are distinguished by the high degree of skill and precision required to perform them based on clearly defined task specifications. Example: boilermakers; brick & stone masons; carpenters; electricians; painters; glaziers; plumbers, pipefitters & steam fitters; roofers; elevator installers; earth drillers; oil & gas rotary drill operators; blasters & explosive workers; automotive mechanics; aircraft mechanics; electric & electronic equipment repairers; millwrights; etchers & engravers; tool & die makers; and pattern makers.
7. **Operatives** – Jobs involving operation of machines or factor-related processing equipment or operating and controlling equipment to facilitate the movement of people or materials. These occupations require intermediate skill level and usually do not require more than several months of training. Example: textile machine operators; laundry & dry cleaning workers; photographic process works; weaving machine operators; electrical & electronic equipment assemblers; semiconductor processors; testers; graders & sorters; bakers; butchers; and other meat, poultry & fish processing workers; bridge & lock tenders; truck, bus or taxi drivers; industrial truck & tractor (forklift) operators; parking lot attendants; sailors; conveyor operations; and hand packers & packagers.
8. **Laborers and Helpers** – Jobs requiring limited skills and only brief training to perform tasks that require little or no independent judgment. Example: production & construction worker helpers; vehicle & equipment cleaners; laborers; freight, stock & material movers; service station attendants; construction laborers; refuse & recyclable materials collectors; septic tank servicers; and sewer pipe cleaners.
9. **Service Workers** – Jobs including food service, personal service, cleaning service, and protective service activities. Skill may be acquired through formal training, job-related training or direct experience. Example: Cooks; bartenders; other food service workers; medical assistants and other healthcare support occupations; hairdressers; ushers; transportation attendants; cleaners; janitors; porters; transit and railroad police and fire fighters; guards; private detectives and investigators.

PROBLEM AREAS
41 CFR 60-2.17(b)

This establishment conducts in-depth analyses of its total employment process to determine whether and where impediments to equal employment opportunity exist. These analyses include evaluation of the following:

- (1) Workforce by organizational unit and job group to determine whether there are any problems with utilization or distribution of minorities or women;
- (2) Personnel activity, including applicant flow, hires, terminations, and promotions to determine whether there are selection disparities;
- (3) Compensation systems to determine whether there are gender-, race-, or ethnicity-based disparities;
- (4) Selection, recruitment, and other personnel procedures to determine whether they result in disparities in the employment or advancement of minorities or women; and
- (5) Other areas that might impact the success of the affirmative action program.

Job groups where underutilization of minorities or women exists are identified in the “Placement Goals” section of this AAP.

During the year, every good faith effort will be made to meet these placement goals as opportunities arise in recruiting, promoting, and transferring. Our ultimate goal is to reach and maintain 100% availability in all job groups.

ACTION-ORIENTED PROGRAMS

41 CFR 60-2.17(c)

This establishment is committed to increasing the diversity of its workforce and to promoting equal employment opportunity for all at all levels of the organization. It undertakes affirmative steps to reach the placement goals identified while continuing to hire and promote the best qualified people to carry out its mission.

The following are among the action-oriented programs designed to eliminate problems and attain goals and objectives:

- Continue to recruit minorities and women in percentages consistent with their availability; maintain records of all applicants; conduct an adverse impact analysis to determine if minorities and women are applying in insufficient numbers.
- Recruit for a diverse pool of applicants through the employment service delivery system, diversity recruiting events, target schools, and job postings in a variety of media which targets minorities, women, veterans, and individuals with disabilities.
- Select qualified individuals without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, age, marital status, genetic information, disability or protected veteran status or any other status or characteristic protected by federal, state, or local law. When apparently qualified minority or female employees are rejected for promotion or upgrading, supervisory personnel provide justification.
- Train human resources personnel in affirmative action best practices.
- Provide human resources related training to managers and supervisors.
- Train all employees in non-discrimination, anti-harassment, and company values.
- Ensure that facilities and company sponsored social and recreational activities are not segregated and encourage all employees to participate in all company sponsored events. (41 CFR 60-1.8)

AUDIT AND REPORTING
41 CFR 60-2.17(d)

This establishment monitors the effectiveness of its affirmative action program.

This establishment's EEO coordinator will:

- (1) Monitor records of all personnel activity, including referrals, placements, transfers, promotions, terminations, and compensation, at all levels to ensure the non-discriminatory policy is carried out;
- (2) Require internal reporting on a scheduled basis as to the degree to which equal employment opportunity and organizational objectives are attained;
- (3) Review report results with all levels of management; and
- (4) Advise top management of program effectiveness and submit recommendations to improve unsatisfactory performance.



II. AFFIRMATIVE ACTION PROGRAM FOR INDIVIDUALS WITH DISABILITIES

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TABLE OF CONTENTS

Definitions	<i>41 CFR 60-741.2</i>
Medical Examinations and Inquiries	<i>41 CFR 60-741.23</i>
Availability of the AAP	<i>41 CFR 60-741.40-.41</i>
Invitation to Self-Identify	<i>41 CFR 60-741.42</i>
Affirmative Action Policy, Practices & Procedures	<i>41 CFR 60-741.44</i>
Equal Employment Opportunity Policy	
Review of Personnel Processes	
Physical and Mental Qualifications	
Reasonable Accommodation	
Harassment and Intimidation	
External Dissemination of Policy, Outreach, and Positive Recruitment	
Internal Dissemination of Policy	
Audit and Reporting	
Responsibility for Implementation	
Training	
Complaint Procedures	<i>41 CFR 60-741.61</i>

DEFINITIONS

41 CFR 60-741.2

For the purpose of implementing the affirmative action program, the following definitions apply:

"Disability" means with respect to an individual: (i) A physical or mental impairment that substantially limits one or more major life activities of such individual; (ii) A record of such impairment; or (iii) Being regarded as having such an impairment. 41 CFR 60-741.3 lists exceptions: individuals currently engaging in the illegal use of drugs; alcoholics whose current use of alcohol prevents such individual from performing the essential functions of the job; or those with a contagious disease which would constitute a direct health threat. The term impairment as defined in this part does not include homosexuality, bisexuality, transvestitism, transsexualism, pedophilia, exhibitionism, voyeurism, gender identity disorders not resulting from physical impairments, or other sexual behavior disorders; compulsive gambling, kleptomania, or pyromania; or psychoactive substance use disorders resulting from current illegal use of drugs.

"Essential functions" are fundamental job duties of the employment position the individual with a disability holds or desires. Reasons a job function may be considered essential include but are not limited to (1) the reason the position exists is to perform that function, (2) there are a limited number of employees available among whom the performance of that job function can be distributed, and/or (3) the function is so highly specialized that the incumbent in the position is hired for his or her expertise or ability to perform that particular function.

"Major life activities" means functions such as caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, sitting, reaching, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, interacting with others, and working. For the purpose of Section 503 of the Act, primary attention is given to those life activities that affect employability.

"Physical or mental impairment" means (1) any physiological disorder, or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: neurological, musculoskeletal, special sense organs, respiratory (including speech organs), cardiovascular, reproductive, digestive, genitourinary, hemic and lymphatic, skin, and endocrine; or (2) any mental or psychological disorder, such as an intellectual disability (formerly termed mental retardation), organic brain syndrome, emotional or mental illness, and specific learning disabilities.

"Qualified individual" means an individual who satisfies the requisite skill, experience, education and other job-related requirements of the employment position such individual holds or desires, and who, with or without reasonable accommodation, can perform the essential functions of such position.

"Reasonable accommodation" means: (1) modifications to a job application process that enable a qualified applicant with a disability to be considered for the position such applicant desires; (2) modifications to the work environment or to the manner or circumstances under which the position is customarily performed that enable a qualified individual with a disability to perform the essential functions of that position; or (3) modifications that enable the employee with a disability to enjoy equal benefits and privileges of employment as are enjoyed by other similarly situated employees without disabilities.

"Record of such impairment" means has a history of, or has been misclassified as having, a mental or physical impairment that substantially limits one or more major life activities. An individual shall be considered to have a record of a disability if the individual has a history of an impairment that substantially limited one or more major life activities when compared to most people in the general population, or was misclassified as having had such an impairment.

"Regarded as having such an impairment" except in the case of impairments that are both "minor" and "transitory", occurs any time a prohibited action is taken against the individual because of an actual or perceived impairment. Prohibited actions include but are not limited to refusal to hire, demotion, placement on involuntary leave, termination, exclusion for failure to meet a qualification standard, harassment, or denial of any other term, condition, or privilege of employment.

"Substantially limits" shall be construed broadly in favor of expansive coverage, to the maximum extent permitted by law. Substantially limits is not meant to be a demanding standard and should not demand extensive analysis. An impairment is substantially limiting within the meaning of this section if it substantially limits the ability of an individual to perform a major life activity as compared to most people in the general population.

MEDICAL EXAMINATIONS AND INQUIRIES
41 CFR 60-741.23

As part of its employment process, this company may make inquiries into the ability of an applicant to perform job-related functions, and/or may ask an applicant to describe or demonstrate how, with or without reasonable accommodation, the applicant will be able to perform job-related functions.

Employment entrance examinations (and/or inquiries) are not given unless all entering employees in the same job category are subjected to such an examination (and/or inquiry) regardless of disability.

Job-related medical exams may be required of employees if they are consistent with business necessity. Inquiries may be made into the ability of employees to perform job-related functions.

If the results of such examinations are used to screen out applicants or employees with disabilities, it will be demonstrated that the exclusionary criteria are job-related and consistent with business necessity, and that performance of the essential job functions cannot be accomplished with reasonable accommodations as required in this part.

Information obtained regarding the medical condition or history of any applicant or employee shall be collected and maintained on separate forms and in separate medical files and treated as a confidential medical record, except that:

A manager or supervisor is to be informed regarding any restrictions on the work or duties of the applicant or employee and necessary accommodations;

First aid and personnel are to be informed when appropriate, if the disability might require emergency treatment; and,

Government officials engaged in enforcing the laws administered by the OFCCP, or enforcing the Americans with Disabilities Act, as amended, shall be provided relevant information on request.

Information obtained regarding the medical condition or history of any applicant or employee shall not be used for any purpose inconsistent with this part.

AVAILABILITY OF THE AFFIRMATIVE ACTION PROGRAM
41 CFR 60-741.40, 60-741.41

This written affirmative action program is designed solely for individuals with disabilities.

This affirmative action program will be reviewed and updated annually by the official designated pursuant to 60-741.44(i). Any significant changes in the program, including employees' benefits or rights, will be communicated to employees.

All employees have been informed through posting on bulletin boards of the affirmative action policy toward individuals with disabilities.

Employees who believe themselves covered by the Rehabilitation Act have been informed that they can identify themselves at any time and ask to be included in the program.

This facility's full affirmative action program, absent the data metrics required by 60-741.44(k), shall be available in the Human Resources department for inspection during regular business hours upon request by any employee or applicant.

INVITATION TO SELF-IDENTIFY
41 CFR 60-741.42

Applicants who believe they are an individual with a disability as defined in 60-741.2(g)(1)(i) or (ii) are invited to voluntarily self-identify as such at the time they apply or are considered for employment. The invitation may be at the same time race and gender information is requested but is separate from the application.

Once an employment offer has been made but before job duties begin, applicants are invited to self-identify.

Employees are invited to voluntarily self-identify if they believe themselves to be an individual with a disability as defined in 60-741.2(g)(1)(i) or (ii). Invitations are made at five year intervals and at least once between these intervals employees are reminded that they may voluntarily update their disability status at any time.

Information is requested on a voluntary basis. No individual will be compelled or coerced to self-identify as an individual with a disability. All information on self-identification is kept confidential, and maintained in a data analysis file and is not a part of the medical files of the individual employee.

An individual with an obvious disability who did not self-identify may be identified by the designated official and included in the affirmative action program.

AFFIRMATIVE ACTION POLICY, PRACTICES AND PROCEDURES

41 CFR 60-741.44

A. EQUAL EMPLOYMENT OPPORTUNITY POLICY

41 CFR 60-741.44(a)

The company's equal opportunity policy, supported by the chief U.S. official, is posted for employees and applicants to read in areas where employees gather and job seekers apply for employment and is included in this affirmative action program. The policy notice will be provided in a format understandable to the disabled individual.

B. REVIEW OF PERSONNEL PROCESSES

41 CFR 60-741.44(b)

The company ensures that its personnel processes do not stereotype disabled individuals in a manner that limits their access to all jobs for which they are qualified and that applicants and employees with disabilities have equal access to these processes. The HR Manager reviews personnel processes to determine whether its programs provide the required affirmative action for employment and advancement of qualified disabled individuals. Data is collected to include total applicants, applicants with disabilities, job openings, jobs filled, and total hires of individuals with disabilities. The company creates a Utilization Analysis for Individuals with Disabilities. Based upon the goals set, this company makes ongoing efforts to search for effective methods of specific, targeted outreach for qualified individuals with disabilities.

C. PHYSICAL AND MENTAL QUALIFICATIONS

41 CFR 60-741.44(c)

Each year all job descriptions are reviewed to ensure that any job qualification requirements that tend to screen out qualified individuals with disabilities are job-related and are consistent with business necessity and the safe performance of the job. Any information obtained during that inquiry is maintained in a confidential manner as required by law.

D. REASONABLE ACCOMMODATION

41 CFR 60-741.44(d)

Every reasonable attempt will be made to accommodate the physical and mental limitations of a disabled employee or applicant. Consideration will be given to modification of existing physical facilities, machinery, and job duties, and in supplying physical aids as may be required and deemed financially reasonable. If an employee with a disability is having significant difficulty performing his or her job and it is reasonable to conclude that the problem is related to the disability, the employee is confidentially advised of the performance problem and asked if the problem is related to the disability. In the case of an affirmative response, a confidential inquiry is made regarding the need for reasonable accommodation. In determining the extent of accommodations, business necessity and financial cost will be considered among other factors.

E. HARASSMENT AND INTIMIDATION
41 CFR 60-741.44(e) and 41 CFR 60-741.69

The company has developed a policy and implemented procedures to provide a discrimination and harassment-free workplace and to ensure that its applicants and employees, including those with disabilities, are not harassed because of their disability status.

No individual shall be subjected to harassment, intimidation, threats, coercion or discrimination because they have engaged in or may engage in any of the following activities:

- (1) Filing a complaint;
- (2) Assisting or participating in an investigation, compliance evaluation, hearing, or any other activity related to the administration of Section 503 of the Rehabilitation Act of 1973, as amended or any other Federal, State, or local law requiring equal opportunity for disabled persons;
- (3) Opposing any act or practice made unlawful by Section 503 or its implementing regulations in this part or any other Federal, State or local law requiring equal opportunity for disabled persons;
or
- (4) Exercising any other right protected by Section 503 or its implementing regulations in this part.

F. EXTERNAL DISSEMINATION OF POLICY, OUTREACH, AND POSITIVE RECRUITMENT
41 CFR 60-741.44(f)

This company has undertaken appropriate outreach and positive recruitment activities to ensure affirmative action for its disability program.

Written notification of company policy related to affirmative action efforts is sent to all subcontractors, including subcontracting vendors and suppliers, requesting appropriate action on their part.

Sources that may be enlisted in outreach efforts, depending upon circumstances, include but are not limited to: the State Vocational Rehabilitation Service Agency (SVRA), State mental health agency, or State developmental disability agency; the Employment One-Stop Career Center or American Job Center; the Department of Veterans Affairs Regional Office; Department of Labor funded entities such as Employer Assistance and Resource Network (www.earnworks.com); local Employment Network organizations listed in the Social Security Administration's Ticket to Work Employment Network Directory (www.yourtickettowork.com/endir); local disability groups, organizations, or Centers for Independent Living; placement or career offices of educational institutions that specialize in the placement of individuals with disabilities; and private recruitment sources, such as professional organizations or employment placement services that specialize in the placement of individuals with disabilities.

As appropriate to meet our commitment to individuals with disabilities, this facility may undertake some of these activities: formal briefing sessions with recruiting sources with explanations of current and future job openings, position descriptions, worker specifications, the selection process, recruiting literature, and arrangements for referral of applicants, follow up, and feedback; special efforts at

educational institutions to reach students who are individuals with disabilities; participation in work-study programs with schools and universities and through EARN; participation of individuals with disabilities in career days, youth motivation programs, and related activities in their communities; any other positive steps necessary to attract qualified individuals with disabilities and consideration of disabled applicants for all available positions for which they may be qualified when the position(s) applied for is unavailable.

A self-assessment of outreach and recruitment efforts is conducted and documented, including the criteria used and the conclusion reached regarding the effectiveness of each effort. If the review indicates that the totality of outreach efforts were not effective, alternative efforts will be implemented.

Documentation of all activities will be retained for three (3) years.

G. INTERNAL DISSEMINATION OF POLICY

41 CFR 60-741.44(g)

To ensure a strong and effective outreach program, this facility has developed internal procedures to communicate to executive, management, supervisory, and other employees its obligation to employ and advance in employment qualified individuals with disabilities and to encourage them to aid in meeting this obligation.

At a minimum, the policy is included in the policy manual if one exists or otherwise made available to employees and if a collective bargaining agreement is involved, union officials and/or employee representatives are notified and requested to cooperate.

All employees and prospective employees are informed of this facility's commitment to engage in affirmative action to increase employment opportunities for individuals with disabilities.

The EEO policy may be publicized in the company newspaper, magazine, annual report and other media; discussed at special meetings with executive, management, and supervisory personnel; and discussed thoroughly in employee orientation meetings and management training programs when conducted.

Individuals with disabilities are included in employee and company publications where employees are featured.

H. AUDIT AND REPORTING

41 CFR 60-741.44(h)

This company has an auditing system which measures the effectiveness of our program and the degree to which our objectives have been met; indicates the need for any remedial action; and, determines whether individuals with known disabilities have had the opportunity to participate in all company sponsored educational, training, recreational and social activities.

Compliance with the affirmative action program's specific obligations is measured and all actions taken as part of the auditing system are documented and retained as employment records subject to the recordkeeping requirements of 60-741.80.

At the end of each AAP year, the HR Manager will review the Utilization Analysis for Individuals with Disabilities for the program's effectiveness in obtaining the desired goals. Where the affirmative action program is found to be deficient, more effective means of outreach will be sought in the new AAP year.

I. RESPONSIBILITY FOR IMPLEMENTATION

41 CFR 60-741.44(i)

Jeanne Klingler, Human Resource Manager is responsible for implementation of affirmative action activities and is identified on all internal and external communications. This official is given necessary senior management support and staff to manage the implementation of this program.

J. TRAINING

41 CFR 60-741.44(j)

All personnel involved in the recruitment, screening, selection, promotion, disciplinary and related processes have been carefully selected and trained to ensure elimination of bias in all personnel actions. The total selection process has been reviewed to ensure freedom from stereotyping disabled persons in a manner that might limit their access to all jobs for which they are qualified.

COMPLAINT PROCEDURES
41 CFR 60-741.61

Any employee or applicant for employment who is an individual with a disability may personally, or by an authorized representative, file a written complaint alleging a violation of the Act or the regulations in this part. The complaint may allege individual or class-wide violation(s). Such complaints must be filed no later than 300 days from the date of the alleged violation unless the time for filing is extended by the OFCCP for good cause shown.

Complaints may be submitted to the OFCCP, 200 Constitution Avenue, NW, Washington, DC 20210, or to any OFCCP regional, district or area office.

Internal procedures have been established at this facility to investigate complaints of alleged discrimination from disabled applicants or employees prior to filing with the OFCCP. When a complaint is known, an investigation will be conducted. At the completion of the investigation, if the complaint is valid, efforts will be made to correct the problem and reasonable accommodations made if needed. If, at the end of the investigation, the complaint is found not to be valid, the complainant will be so informed and also advised of his rights to file a complaint with the OFCCP. The complaints and related actions are kept confidential as much as practicable.

If a disabled individual files a complaint with the OFCCP alleging noncompliance with the requirements of the Act, the company will cooperate with the OFCCP in its investigation of the complaint, and provide necessary pertinent information regarding its employment practices with respect to individuals with disabilities.

Information concerning complaint procedures is available to all employees.

Complaints must be signed by complainants or authorized representatives and must contain the following information:

- i. Name and address (including telephone number) of the complainant;
- ii. Name and address of the contractor who committed the alleged violation;
- iii. The facts showing that the individual has a disability, a record or history of disability or was regarded by the contractor as having a disability;
- iv. A description of the act or acts considered to be a violation, including the pertinent dates (in the case of an alleged continuing violation, the earliest and most recent date that the alleged violation occurred should be stated); and
- v. Other pertinent information available which will assist in the investigation and resolution of the complaint, including the name of any known federal agency with which the employer has contracted.

A complaint filed by an authorized representative need not identify by name the person on whose behalf it is filed. The person filing the complaint, however, shall provide the OFCCP with the name,

address and telephone number of the person on whose behalf it is made, and the other information specified above. The OFCCP shall verify the authorization of such a complaint by the person on whose behalf the complaint is made. Any such person may request that the OFCCP keep his or her identity confidential, and the OFCCP will protect the individual's confidentiality wherever that is possible given the facts and circumstances in the complaint.

Where a complaint contains incomplete information, OFCCP shall seek the needed information from the complainant. If the information is not furnished to OFCCP within 60 days of the date of such request, the case may be closed.

The Department of Labor shall institute a prompt investigation.



III. AFFIRMATIVE ACTION PROGRAM FOR VETERANS

West Central Mass Transit District
Company

WCMTD
Establishment

1120 W Walnut Street
Street Address

Jacksonville, IL 62650
City and State

Inclusive Dates of the AAP: **July 1, 2018 to June 30, 2019**

Program Completed by: **Jeanne Klingler, Human Resource Manager**

Telephone Number: **217-245-2900**

TABLE OF CONTENTS

Veteran Definitions	<i>41 CFR 60-300.2</i>
Medical Examinations and Inquiries	<i>41 CFR 60-300.23</i>
Availability of the AAP	<i>41 CFR 60-300.40, 60-300.41</i>
Invitation to Self-Identify	<i>41 CFR 60-300.42</i>
Affirmative Action Policy, Practices & Procedures	<i>41 CFR 60-300.44</i>
Equal Employment Opportunity	
Review of Personnel Processes	
Physical and Mental Qualifications	
Reasonable Accommodation	
Harassment and Intimidation	
External Dissemination of Policy, Outreach, and Positive Recruitment	
Internal Dissemination of Policy	
Audit and Reporting System	
Responsibility for Implementation	
Training	
Complaint Procedures	<i>41 CFR 60-300.61</i>

VETERAN DEFINITIONS

41 CFR 60-300.2

For the purpose of implementing the company's affirmative action program for veterans, the following definitions are being used:

“Protected Veteran” means a veteran who is protected under the non-discrimination and affirmative action provisions of the Act; specifically, a veteran who may be classified as a “disabled veteran”, “recently separated veteran”, “active duty wartime or campaign badge veteran”, or an “Armed Forces service medal veteran”.

“Disabled Veteran” means (1) a veteran of the U.S. military, ground, naval, or air service who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs, or (2) a person who was discharged or released from active duty because of a service-connected disability.

“Active Duty Wartime or Campaign Badge Veteran” means a veteran who served on active duty in the U.S. military, ground, naval, or air service during a war or in a campaign or expedition for which a campaign badge has been authorized, under the laws administered by the Department of Defense.

“Armed Forces Service Medal Veteran” means any veteran who, while serving on active duty in the U.S. military, ground, naval, or air service, participated in a United States military operation for which an Armed Forces service medal was awarded pursuant to Executive Order 12985 (61 FR 1209).

“Recently Separated Veteran” means any veteran during the three-year period beginning on the date of such veteran’s discharge or release from active duty in the U.S. military, ground, naval or air service.

MEDICAL EXAMINATIONS AND INQUIRIES

41 CFR 60-300.23

As part of its employment process, this facility may make inquiries into the ability of an applicant to perform job-related functions, and/or may ask an applicant to describe or demonstrate how, with or without reasonable accommodation, the applicant will be able to perform job-related functions.

Employment entrance examinations (and/or inquiries) are not given unless all entering employees in the same job category are subjected to such an examination (and/or inquiry) regardless of their status as a disabled veteran.

Job-related medical exams may be required of employees if they are consistent with business necessity. Inquiries may be made into the ability of employees to perform job-related functions.

If the results of such examinations are used to screen out applicants or employees who are disabled veterans, it will be demonstrated that the exclusionary criteria are job-related and consistent with business necessity, and that performance of the essential job functions cannot be accomplished with reasonable accommodations as required in this part.

Information obtained regarding the medical condition or history of any applicant or employee shall be collected and maintained on separate forms and in separate medical files and treated as a confidential medical record, except that:

A manager or supervisor is to be informed regarding any restrictions on the work or duties of the applicant or employee and necessary accommodations;

Safety and health personnel are to be informed, when appropriate, if the disability might require emergency treatment; and,

Authorized government officials engaged in enforcing the laws administered by the OFCCP or enforcing the Americans with Disabilities Act, shall be provided relevant information on request.

Information obtained regarding the medical condition or history of any applicant or employee shall not be used for any purpose inconsistent with this part.

AVAILABILITY OF THE AFFIRMATIVE ACTION PROGRAM
41 CFR 60-300.40, 60-300.41

This facility has developed a written affirmative action program designed solely for veterans covered by the Act.

The facility will review and update its affirmative action program for veterans annually. Any significant changes in the program, including employees' benefits or rights, will be communicated to employees.

This facility's full affirmative action program, absent the data metrics required by 60-300.44(k), shall be available in the Human Resources Department for inspection during regular business hours upon request by any employee or applicant.

All employees of this facility have been informed through posting on bulletin boards of the company's affirmative action policy toward veterans. Employees who believe themselves covered by the Vietnam Era Veterans Readjustment Assistance Act of 1974, as amended by the Jobs for Veterans Act of 2002, 38 U.S.C. 4212 (VEVRAA) have been informed that they may make a request to benefit under the affirmative action program at any time.

INVITATION TO SELF-IDENTIFY
41 CFR 60-300.42

Applicants who believe they are protected veterans are invited to voluntarily self-identify as a protected veteran (but not in a specific category) at the same time race and gender information is requested.

Once an employment offer has been made but before job duties begin, applicants are invited to self-identify to which, if any, of the specific categories of protected veterans they belong.

Information is requested on a voluntary basis, will be kept confidential, refusal to provide it will not subject the applicant to any adverse treatment, and it will not be used in a manner inconsistent with the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended.

If an applicant identifies himself or herself as a disabled veteran, inquiry will be made as to whether an accommodation is necessary.

AFFIRMATIVE ACTION POLICY, PRACTICES AND PROCEDURES

41 CFR 60-300.44

A. EQUAL EMPLOYMENT OPPORTUNITY POLICY

41 CFR 60-300.44 (a)

The company's equal opportunity policy, supported by the chief U.S. official, is posted for employees and applicants to read in areas where employees gather and job seekers apply for employment and is included in this affirmative action program.

B. REVIEW OF PERSONNEL PROCESSES

41 CFR 60-300.44 (b)

Personnel processes are reviewed by the HR Manager to ensure that they provide the required affirmative action for employment and advancement of qualified covered veterans. Data is collected to include total applicants, protected veteran applicants, jobs opened and jobs filled and percentage filled with protected veterans. Should our hiring benchmark not be met, the company will search for more effective methods of specific, targeted outreach for protected veterans. Employment records are maintained to determine the availability of promotable and transferable qualified covered veterans presently employed and to determine whether their present and potential skills are being fully utilized or developed. If there are job openings, covered veterans are processed through the regular employment procedures.

C. PHYSICAL AND MENTAL QUALIFICATIONS

41 CFR 60-300.44 (c)

All physical and mental job qualification standards in position descriptions are reviewed to ensure that, to the extent that such standards tend to screen out qualified disabled veterans, they are job-related for the position in question and are consistent with business necessity. Any information obtained during this review is maintained in a confidential manner as required by law.

D. REASONABLE ACCOMMODATION

41 CFR 60-300.44 (d)

Every reasonable attempt will be made to accommodate the physical and mental limitations of a disabled veteran or applicant. Consideration will be given to modification of existing physical facilities, machinery, and job duties, and in supplying physical aids as may be required and deemed financially reasonable. In the construction of new facilities, or the redesigning of facilities within existing buildings, barrier-free architectural designs will be considered. In determining the extent of accommodations, business necessity, and financial cost, will be considered among other factors.

E. HARASSMENT AND INTIMIDATION

41 CFR 60-300.44 (a), 41 CFR 60-300.44 (e) and 41 CFR 60-300.69

The company has developed a policy and implemented procedures to provide a discrimination and harassment-free workplace and to ensure that its applicants and employees, including veterans, are not harassed because of their veteran status.

No individual shall be subjected to harassment, intimidation, threats, coercion or discrimination because they have engaged in or may engage in any of the following activities:

- (1) Filing a complaint;
- (2) Assisting or participating in an investigation, compliance evaluation, hearing, or any other activity related to the administration of the affirmative action provisions of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended (VEVRAA) or any other Federal, state, or local law requiring equal opportunity for protected veterans;
- (3) Opposing any act or practice made unlawful by VEVRAA or its implementing regulations in this part or any other Federal, state or local law requiring equal opportunity for covered veterans; or
- (4) Exercising any other right protected by VEVRAA or its implementing regulations in this part.

F. EXTERNAL DISSEMINATION OF POLICY, OUTREACH AND POSITIVE RECRUITMENT

41 CFR 60-300.44 (f)

This facility has undertaken appropriate outreach and positive recruitment activities to ensure affirmative action for protected veterans.

Written notification of company policy related to affirmative action efforts is sent to all subcontractors, including subcontracting vendors and suppliers, requesting appropriate action on their part.

Sources that may be enlisted in outreach efforts, depending upon circumstances, include but are not limited to: the Veterans' representative at the local employment service office, Department of Veterans Affairs Regional Office, veterans' counselors on college campuses, service officers of the national veterans' groups in the area, local veterans' groups and service centers, the Department of Defense Transition Assistance Program or any subsequent program that might replace it in whole or in part, and any organization listed in the Employer Resources section of the National Resource Directory (<http://www.nationalresourcedirectory.gov/>), or any future service that replaces or complements it.

As appropriate to meet our commitment to veterans, this facility may undertake some of these activities: formal briefing sessions with recruiting sources with explanations of current and future job openings, position descriptions, worker specifications, the selection process, recruiting literature, and arrangements for referral of applicants, follow up, and feedback; special efforts at educational

institutions; participation in work-study programs with the Department of Veterans Affairs rehabilitation facilities; participation of protected veterans in career days, youth motivation programs, and related activities in their communities; any other positive steps necessary to attract qualified protected veterans, and consideration of protected veteran applicants for all available positions for which they may be qualified when the position(s) applied for is unavailable.

An annual self-assessment of outreach and recruitment efforts will be conducted and documented, including the criteria used and the conclusion reached regarding the effectiveness of each effort. If the review indicates that the totality of outreach efforts were not effective, alternative efforts will be implemented.

Documentation of all activities will be retained for three (3) years.

G. INTERNAL DISSEMINATION OF POLICY

41 CFR 60-300.44 (g)

To ensure a strong and effective outreach program, this facility has developed internal procedures to communicate to executive, management, supervisory, and other employees its obligation to employ and advance in employment qualified protected veterans and to encourage them to aid in meeting this obligation.

At a minimum, the policy is included in the policy manual if one exists or otherwise made available to employees and if a collective bargaining agreement is involved, union officials and/or employee representatives are notified and requested to cooperate.

All employees and prospective employees are informed of this facility's commitment to engage in affirmative action to increase employment opportunities for protected veterans.

The EEO policy may be publicized in the company newspaper, magazine, annual report and other media; discussed at special meetings with executive, management, and supervisory personnel; and discussed at employee orientation meetings and reviewed during management training programs when conducted.

Disabled veterans are included in employee and company publications where employees are featured.

H. AUDIT AND REPORTING SYSTEM

41 CFR 60-300.44 (h)

This company has an auditing system which measures the effectiveness of our program and the degree to which our objectives have been met; indicates the need for any remedial action; and, determines whether known protected veterans have had the opportunity to participate in all company sponsored educational, training, recreational and social activities.

Compliance with the affirmative action program's specific obligations is measured and all actions taken as part of the auditing system are documented and retained as employment records subject to the recordkeeping requirements of 60-300.80.

The HR Manager will review the Veteran Hiring Benchmark Analysis for the program's effectiveness in attaining the desired benchmark. Where the affirmative action program is found to be deficient, more effective means of outreach will be sought in the new AAP year.

I. RESPONSIBILITY FOR IMPLEMENTATION

41 CFR 60-300.44 (i)

Jeanne Klingler, Human Resource Manager is responsible for implementation of affirmative action activities identified on all internal and external communications. This official is given necessary senior management support and staff to manage the implementation of this program.

J. TRAINING

41 CFR 60-300.44 (j)

All personnel involved in the recruitment, screening, selection, promotion, disciplinary and related processes have been carefully selected and trained to ensure elimination of bias in all personnel actions. The total selection process has been reviewed to ensure freedom from stereotyping protected veterans in a manner that might limit their access to all jobs for which they are qualified.

COMPLAINT PROCEDURES
41 CFR 60-300.61

Any employee or applicant for employment may personally, or by an authorized representative, file a written complaint alleging a violation of the Act or the regulations in this part. The complaint may allege individual or class-wide violation(s). Such complaints must be filed no later than 300 days from the date of the alleged violation unless the time for filing is extended by OFCCP for good cause shown.

Complaints may be submitted to the OFCCP, 200 Constitution Avenue, NW, Washington, DC 20210, or to any OFCCP regional, district, or area office. Complaints may also be submitted to the Veterans' Employment and Training Service of the Department of Labor directly, or through the Local Veterans' Employment Representative (LVER) at the local employment service office. Such parties will assist veterans in preparing complaints, promptly refer such complaints to OFCCP, and maintain a record of all complaints which they receive and forward. OFCCP shall inform the party forwarding the complaint of the progress and results of its complaint investigation. The state workforce agency shall cooperate with the Deputy Assistant Secretary in the investigation of any complaint.

Internal procedures have been established at this facility to investigate complaints of alleged discrimination from covered veterans prior to filing with the OFCCP. When a complaint is known, an investigation will be conducted. At the completion of the investigation, if the complaint is valid, efforts will be made to correct the problem and reasonable accommodations made if needed. If, at the end of the investigation, the complaint is found not to be valid, the complainant will be so informed and also advised of his/her rights to file a complaint with the OFCCP. The complaints and related actions are kept confidential.

If a veteran files a complaint with the OFCCP alleging noncompliance with the requirements of the Act, the company will cooperate with the OFCCP in its investigation of the complaint, and provide necessary pertinent information regarding its employment practices with respect to veterans.

Information concerning complaint procedures is available to all employees.

Complaints must be signed by the complainant or his or her authorized representative and must contain the following information:

- i. Name and address (including telephone number) of the complainant;
- ii. Name and address of the contractor who committed the alleged violation;
- iii. Documentation showing that the individual is a protected veteran or pre-JVA veteran;
- iv. A description of the act or acts considered to be a violation, including the pertinent dates (in the case of an alleged continuing violation, the earliest and most recent date that the alleged violation occurred should be stated); and

- v. Other pertinent information available which will assist in the investigation and resolution of the complaint, including the name of any known Federal agency with which the employer has contracted.

A complaint filed by an authorized representative need not identify by name the person on whose behalf it is filed. The person filing the complaint, however, shall provide OFCCP with the name, address and telephone number of the person on whose behalf it is made, and the other information specified above. OFCCP shall verify the authorization of such a complaint by the person on whose behalf the complaint is made. Any such person may request that OFCCP keep his or her identity confidential, and OFCCP will protect the individual's confidentiality wherever that is possible given the facts and circumstance in the complaint.

Where a complaint contains incomplete information, OFCCP shall seek the needed information from the complainant. If the information is not furnished to OFCCP within 60 days of the date of such request, the case may be closed.

The Department of Labor shall institute a prompt investigation of each complaint.