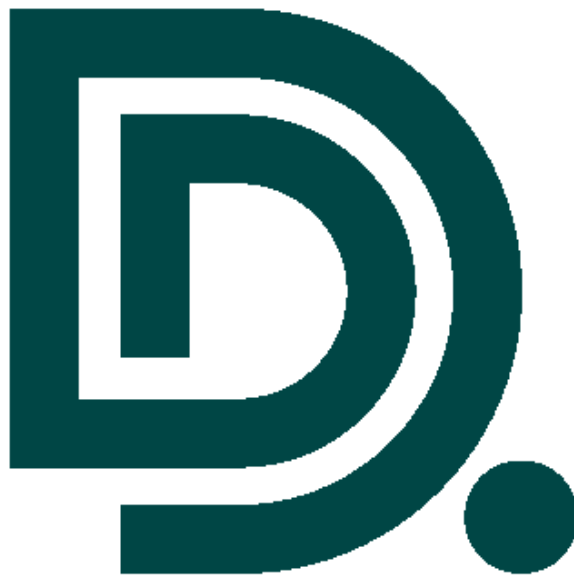


Detroit Department of Transportation
EQUAL EMPLOYMENT OPPORTUNITY (EEO) PROGRAM

January 1, 2022 – December 31, 2025



Submitted by:
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This document has been prepared in accordance with the requirements of the
Federal Transit Administration Circular 4704.1A

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Section 1: Introduction

The Detroit Department of Transportation (DDOT or Department) Equal Employment Opportunity Program (EEO Plan) is created to comply with the Federal Transit Administration (FTA) Circular 4704.1A “Equal Employment Opportunity (EEO) Requirement and Guidelines for Federal Transit Administration (FTA) Recipients.” The EEO Program is administered by the Equal Employment Opportunity Officer (EEO Officer) and reports to DDOT’s Executive Director of Transit and Deputy Director of Administration.

FTA requires each applicant, recipient, subrecipient, or contractor that meets the EEO Program threshold requirements to submit an updated EEO Program every four years or as major changes occur in the workforce or employment conditions, whichever comes first. DDOT’s EEO Program is due to FTA on March 1, 2022, and every four years thereafter. The Employment Practices tables for the EEO Program should be for either the time since the last program submission, or the previous four years, whichever is shorter.

The EEO Program contains an analysis of DDOT’s employment practices and statistics, beginning January 1, 2018, to December 31, 2021. The analysis determines DDOT’s actions as it relates to, but not limited to, recruitment, hiring, promotion, separations (including retirement) and discipline. The review maintains that DDOT does not use these practices to create employment barriers, nor do they unjustifiably contribute to underutilization.

Section 2: Description of Race/Ethnic Categories

The Minority race/ethnic groups used in this EEO Plan are defined by the FTA Circular as follows:

- American Indians and Alaska Natives refers to individuals with origins in any of the original peoples of North and South America (including Central America) and who maintain tribal affiliation or community attachment.
- Asians refers to individuals with origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam
- Blacks or African Americans refers to individuals with origins in any of the Black racial groups Africa.
- Hispanics or Latinos includes people of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- Native Hawaiians or Other Pacific Islanders refers to people with origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
- Multiracial or Two or More Race includes individuals with origins in more than one of the Federally designated racial categories.

Section 3: Description of Protected Groups

Coverage under the EEO Program laws and regulations apply to:

- Females includes white females and minority females belonging to or identifying with the following race or ethnic groups: American Indians/Alaskan Natives, Asians, Blacks/African Americans, Hispanics/Latinos, Native Hawaiian/Pacific, and Two or More Races.
- Minorities as defined above, regardless of gender.
- Individuals with Disability: A person who (1) has a physical or mental impairment that substantially limits one or more of his/her major life activities, (2) has a record of such impairment, or (3) is regarded as having such an impairment.
- Veterans are defined as “eligible veteran” which means a person who: served on active duty for a period of more than 180 days and was discharged or released therefrom with other than a dishonorable discharge; was discharged or released from active duty because of a service-connected disability; as a member of a reserve component under an order to active duty, served on active duty during a period of war or in a campaign or expedition for which a campaign badge is authorized and was discharged or released from such duty with other than a dishonorable discharge, or was discharged or released from active duty by reason of a sole survivorship discharge.

DDOT complies with all relevant state and federal laws to ensure equitable treatment for all DDOT’s employees and applicants.

Section 4: DDOT'S EEO Statement of Policy

The Detroit Department of Transportation (DDOT) has a strong commitment to the community we serve and our employees. As an equal opportunity employer, we strive to have a workforce that reflects the community we serve. No person is unlawfully excluded from employment opportunities based on race, color, religion, national origin, sex (including gender identity, sexual orientation, and pregnancy), age, genetic information, disability, veteran status, or other protected class.

DDOT Equal Employment Opportunity (EEO) policy applies to all employment actions, including but not limited to, recruitment, hiring, selection for training, promotion, transfer, demotion, layoff, termination, rates of pay or other forms of compensation.

All applicants and employees have the right to file complaints alleging discrimination. Retaliation against an individual who files a charge or complaint of discrimination, participates in an employment discrimination proceeding (such as an investigation or lawsuit), or otherwise engages in protected activity is strictly prohibited and will not be tolerated.

DDOT is committed to providing reasonable accommodations to applicants and employees who need them because of a disability or to practice or observe their religion, absent undue hardship.

As DDOT's Executive Director of Transit, I maintain overall responsibility and accountability for DDOT's compliance with its EEO Policy and Program. To ensure day-to-day management, including program preparation, monitoring, and complaint investigation, I have appointed Alicia Miller, Compliance Manager, alimil@detroitmi.gov as DDOT's EEO Officer. Alicia Miller will report directly to me and acts with my authority with all levels of management, labor unions, and employees.

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

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

C. Mikel Oglesby, Executive Director of Transit

Signature Date

Section 5: Dissemination Plan

DDOT will publicize and disseminate its EEO statement of policy internally and externally by posting it in conspicuous locations so that employees, applicants, and potential applicants are aware of DDOT's commitment to EEO. DDOT will communicate the existence of its EEO policy and program to employees, applicants, and potential applicants by:

Section 5.1: Internal Dissemination

- Providing employees with DDOT's statement of policy approved by the Executive Director of Transit.
- Posting official EEO materials (e.g., Federal and state labor laws poster(s) and the statement of policy on bulletin boards, near time clocks, in employees' breakrooms, and in the employment/personnel office.
- Including the EEO statement of policy in its employee handbook.
- Meeting with top management officials (e.g., bus operations, human resources, planning, marketing, etc.) at a minimum semiannually to discuss the EEO Program and its implementation.
- Conducting EEO training for employees and for managers.
- Conducting EEO training for all new supervisors or managers within 90 days of their appointment and require new employees to sign a form acknowledging they have read and understand the policy.

Section 5.2: External Dissemination

- The EEO policy will be disseminated to employment agencies, educational institutions, and minority and women organizations.
- All recruitment ads (e.g., newspapers, magazines, websites, and social media) must state that "DDOT is an equal employment opportunity employer."

Section 6: EEO Officer Role and Responsibility

DDOT's EEO Officer is responsible for EEO Program management, oversight, and reflects DDOT's EEO commitment. DDOT's Executive Director of Transit has named Alicia Miller, Compliance Manager, as the EEO Officer. The EEO Officer contact information is as follows:

Alicia Miller
100 Mack Avenue
Detroit, MI 48201
313-833-3658 office
DDOT_EEO@detroitmi.gov

EEO Officer's Program responsibilities includes:

- Developing the EEO policy statement and a written EEO Program.
- 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 DDOT's nondiscrimination plan with all managers and supervisors to ensure that the policy is understood.
- Concurring in the hiring and promotion process.
- In conjunction with human resources, periodically reviewing employment practices policies (e.g., hiring, promotions, training), complaint policies, reasonable accommodation policies, performance evaluations, grievance procedures, and union agreements.
- Reporting at least semiannually to the Executive Director of Transit on each division's progress in relation to DDOT's goals and contractor and vendor compliance.
- Serving as liaison between DDOT; Federal, state, county, 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 complaints of EEO discrimination.
- Providing EEO training for employees and managers.
- In conjunction with human resources, advising employees and applicants of available training programs and professional development opportunities and the entrance requirements.
- Auditing postings of the EEO policy statement to ensure compliance information is posted and up to date.

Section 7: DDOT's Directors, Managers, and Supervisors' Responsibilities

All Directors, Managers, and Supervisors are responsible for ensuring EEO, must not discriminate based on a protected class, and bear responsibility for ensuring that DDOT's EEO Program policies and programs are carried out.

EEO responsibilities for DDOT's Directors, Managers and Supervisors include:

- Participating actively in periodic audits of all aspects of employment to identify and remove barriers obstructing the achievement of specified goals and objectives.
- Hold regular discussions with other managers and supervisors, employees, and affinity groups to ensure policies and procedures are being followed.
- Maintain and update the personnel database for generating reports required for the nondiscrimination program.
- Cooperating with the EEO Officer 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, mentoring).

DDOT has established an advisory committee that reflects all districts in the City of Detroit and use an employee suggestion box to ensure diversity and inclusion.

Section 8: Workforce Analysis

Section 8.1: Utilization Analysis

The purpose of the utilization analysis is to identify those job categories where there is underutilization of a certain group of persons in relation to the available labor market. The labor market defined individuals who could reasonably be expected to be employed with DDOT. The utilization analysis is also used to establish hiring goals and timetable to correct any employment practices that contributed to any underutilization. Underutilization occurs when the percentage of employees in a protected group (women or minorities) is less than the availability percentage for that protected group in the relevant labor market.

The utilization analysis (in [Appendix A](#) "Utilization Analysis 2021) compares the percentage of active employees (as of December 31, 2021) in a job category with the percentage of employees in the Wayne County, Michigan labor market according to the "Detailed Census Occupation by Sex, and Race/Ethnicity for Residence Geography, Total Population" ([Appendix B](#) "EEO-ALL02R FY2021). Appointed and employees with an annual salary greater than \$70,000 were removed from the analysis. The analysis examines occupational category cross-referenced by ethnicity and gender and provides the percentage of underutilized and the number of needed to reach parity.

Figure 3 – Utilization Analysis Persons Needed to Reach Parity

Job Category	White		AI/AN		Black		H/L		Asian		NHOPI		Multi		Total
	M	F	M	F	M	F	M	F	M	F	M	F	M	F	
Officials/Administrators	0	5	0	0	0	0	0	0	0	0	0	0	0	0	5
Professionals	0	7	0	0	0	0	0	0	0	0	0	0	0	0	7
Technicians	0	5	0	0	0	0	1	0	0	0	0	0	0	0	6
Protective Services	0	4	0	0	0	0	1	0	0	0	0	0	0	0	5
Paraprofessionals	0	1	0	0	0	1	0	0	0	0	0	0	0	0	2
Administrative Support	0	7	0	0	11	0	0	0	1	0	0	0	0	0	19
Skilled Craft	0	47	0	0	0	39	0	0	0	1	0	0	0	0	87
Service Maintenance	0	107	8	0	0	0	0	0	0	0	0	0	0	0	115
Total	0	183	8	0	11	40	2	0	1	1	0	0	0	0	246

The utilization analysis identified 9 hiring goals for females and 5 hiring goals for minority males needed to reach parity. To set realistic hiring goals, the “Twenty-five Percentage” rule was applied. The “Twenty-five Percentage” rule is when a job category underutilized rate is greater than 25% a hiring goal would be set. DDOT would seek to hire at least 50% of the persons needed to reach parity for each job category. When the percent underutilized was not significant (less than 25%), that job category was excluded from underutilization goal setting. The weighted availability of qualified persons within the labor market was considered when developing the EEO program goals and timetable. These goals will be the focus for the EEO Program 2022-2025 period.

Section 8.2: Comparing Incumbency to Availability

A comparison of incumbency to availability for each job category was conducted for the purpose of establishing the following hiring goals:

Official and Administrators

The utilization analysis shows minority males are utilized and well represented in the Officials & Administrators job category; White females are underutilized. There is no White female representation in this job category, while White females labor market availability is 71.9%.

Professionals

DDOT demonstrates an underutilization of White females in the Professionals job category, as their labor market availability is 51%, with no representation in DDOT’s workforce.

Technicians

Hispanic males and White females are underutilized in the Technicians job category. Hispanic males labor market availability is 10%, with no representation in DDOT’s workforce. White females labor market availability is 39%, while one White female is represented in DDOT’s workforce.

Protective Service

DDOT demonstrates underutilization of Hispanic males and White females in the Protective Service job category. Hispanic males and White females have a labor market availability of 7% and 26% respectively, and no representation in DDOT's workforce.

Paraprofessionals

White and Black females in the Paraprofessionals job category are underutilized, as their availability in the relevant labor market is 65% and 26% respectively.

Administrative Support

Black males, Asian males, and White females are underutilized in the Administrative Support job category. There are 13 Black males represented in the Administrative Support job category, with a 50% labor market availability. Two White females are represented in DDOT's workforce, while White females represent 19% of the labor market. Asian males' labor market availability is 3% with no representation in DDOT's workforce.

Skilled Craft

Minority males are over utilized and well represented in the Skilled Craft job category. The job titles in this category includes body, repair, and general auto mechanics. DDOT employs three Black females in its Skilled Craft job positions. White and Asian females are not represented in DDOT's workforce, despite White females represent 53% and Asian females 1% of the relevant labor job market.

Service Maintenance

Black males are over utilized and well represented in the Service Maintenance job category. The Transportation Equipment Operators (bus drivers) has the highest number of positions available within the department. DDOT's utilization analysis shows other minorities and Black females are well represented as well, while American Indian/Alaska Native (AI/AN) males are underutilized and are not represented in DDOT's workforce, with a 2% labor market availability rate. There is one White female represented in DDOT's workforce, while 23% of the relevant labor job market is available.

Section 9: EEO Program Goals and Timetable

To reach parity in underutilized areas, hiring goals were established whenever minorities or female representation within a job category was less than the labor market availability. These goals considered the availability of qualified employees within the Department, the city, and within the Wayne County labor area. The utilization summary and hiring goals for each job category is listed below:

Figure 4 – Hiring Goals Set to Reach Parity

Job Category	White		AI/AN		Black		H/L		Asian		NHOPI		Multi		Total
	M	F	M	F	M	F	M	F	M	F	M	F	M	F	
Officials/Administrators	0	3	0	0	0	0	0	0	0	0	0	0	0	0	3
Professionals	0	3	0	0	0	0	0	0	0	0	0	0	0	0	3
Technicians	0	3	0	0	0	0	1	0	0	0	0	0	0	0	4
Protective Services	0	2	0	0	0	0	0	0	0	0	0	0	0	0	2
Paraprofessionals	0	1	0	0	0	1	0	0	0	0	0	0	0	0	2
Administrative Support	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Skilled Craft	0	23	0	0	0	20	0	0	0	0	0	0	0	0	43
Service Maintenance	0	54	0	0	0	0	0	0	0	0	0	0	0	0	54
Total	0	89	0	0	0	21	1	0	0	0	0	0	0	0	111

DDOT’s goal is to increase females and minorities representation in all underutilized job categories by evaluating and increasing community recruitment efforts and promotional practices to ensure equal hiring and advancement opportunities are available to all applicants and employees.

The goals established in the EEO Program are realistic targets and reasonably attainable by:

1. Developing recruitment strategy plans,
2. Monitoring hiring data
3. Reviewing employees’ practices with HR Recruiter and Employees Services
4. Applying good faith efforts to make all aspects of the EEO Program work
5. Maintaining the current workforce representation of females and minorities at the availability level or above.

Figure 5 – EEO Program Goals and Timetable

EEO Program Goals	Short Term Goals	Long Term Goals
EEO Program	Conduct quarterly review with an HR Recruiter and Employees Services to coordinate efforts to target and recruit groups identified as being underutilized.	Implementation of EEO Program objectives in Department policies and procedures Submit an updated EEO Program by March 1, 2025
Recruitment Strategies	Assist HR Recruiter in outreach events to achieve the hiring goals for parity	Identify and develop relationships with minority and female local organizations, publications, and community groups Review the entry-level examination and screening practices to identify factors that may be adversely impacting the protected classes
Monitoring and Reporting	Compile monthly statistical data and disseminate internally and externally Compile semiannual meetings with DDOT’s leadership to report the EEO Program goals progress	Develop an EEO Program data reporting system to ensure all regulatory data and requirements are tracked and available to DDOT’s staff
EEO Program Training	Update EEO Program Training curriculum and outreach efforts to ensure employees awareness of program	Conduct Refresher Training for all directors, managers, and supervisors Conduct Employees Surveys to collect veterans and IWD status
EEO Taskforce	Develop EEO Taskforce that promotes a positive work environment that values diversity by evaluating employees’ practices policies	EEO Taskforce makes recommendations to HR Recruiter, HR Analysis and Employees Services Investigate reasons females are not applying to the degree that men are for each job category.

Section 10: Assessment of Employment Practices

DDOT conducted a detailed assessment of present employment practices to identify those practices that operate as employment barriers and unjustifiably contribute to underutilization.

Section 10.1: Recruitment, Testing & Selection

Applicants for employment are considered regardless of race, sex, color, creed, age, religion, sexual orientation, national origin, veteran status, disability, or political orientation. The City of Detroit Human Resources asks all applicants for employment to read and acknowledge the following statement to ensure applicants for employment and employees seeking promotions are aware that DDOT is an equal employment opportunity employer.

“The City of Detroit is an equal opportunity employer. No applicant shall be discriminated against based on race, color, religion, age, gender, national origin, disability, or other criteria prohibited by City, State or Federal law.”

DDOT’s EEO Statement of Policy is given to new employees during the FTA Awareness Training Class and can be obtained from the EEO Officer, HR Employee Services staff member or any Manager.

Applicants who are veterans are given credits when applying for any position. All employees are provided with the City of Detroit’s Executive Order 2014-2 “Internal Policy Against Any and All Forms of Discrimination and/or Sexual Harassment” with their new hire orientation packets.

Recruitment requests are initiated by the employing department through the Human Resources Analyst or Recruiter. Vacant positions will be advertised to the public for a minimum of 10 working days. It is the policy of the City of Detroit that all applicants for employment must complete an online application. The employment application forms follow applicable federal, state, and local laws and policies. All job notices are posted on the City of Detroit [website](#).

All job postings include, at a minimum, the duties and pay of the class, examination subjects and weights, minimum entrance qualifications, evaluation procedures, time, place, and process to apply for an examination.

In addition to the job interview, DDOT may utilize tests below as an additional measure in the selection process. Cognitive Test: Assess reasoning, memory, perceptual speed and accuracy, and skills in arithmetic and reading comprehension, as well as knowledge of a particular job function.

1. Physical Ability Test: Measures the physical ability to perform a particular task.

The HR Department determines that applicants are qualified for positions. Applications and supporting documents are screened by individual Managers for evaluation. Applicants deemed most adequately suited for the position are asked to submit themselves for an interview with the selection committee. The selection committee consists of a DDOT Supervisor, Manager or Executive and a HR Recruiter.

Before an offer is made, the HR Recruiter ensures the process adheres to the City of Detroit’s Civil Service Rules, Collective Bargaining Agreements and Recruitment Regulations.

Section 10.2: New Hires

A review of the new hires to the Department from 2018-2021 for each job category, by race and sex, is below. Each category is inclusive of all pay bands from \$0-\$70,000:

Figure 6 - 2018 New Hires

Job Category	White		AI/AN		Black		H/L		Asian		NHOP		Multi		Total
	M	F	M	F	M	F	M	F	M	F	M	F	M	F	
Officials/Administrators	0	0	0	0	2	0	0	0	0	0	0	0	0	0	2
Professionals	1	0	0	0	3	4	0	0	0	0	0	0	0	0	8
Technicians	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Protective Services	0	0	0	0	1	1	0	0	0	0	0	0	0	0	2
Paraprofessionals	0	1	0	0	0	1	0	0	0	0	0	0	0	0	2
Administrative Support	3	0	0	0	1	4	0	0	0	0	0	0	0	0	8
Skilled Craft	0	0	0	0	7	0	0	0	0	0	0	0	0	0	7
Service Maintenance	0	1	0	0	77	45	0	0	0	1	0	0	0	0	124
Total	4	2	0	0	91	55	0	0	0	1	0	0	0	0	153

Figure 7 - 2019 New Hires

Job Category	White		AI/AN		Black		H/L		Asian		NHOP		Multi		Total
	M	F	M	F	M	F	M	F	M	F	M	F	M	F	
Officials/Administrators	3	0	0	0	3	3	0	0	2	0	0	0	0	0	11
Professionals	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Technicians	0	0	0	0	0	1	0	0	0	0	0	0	0	0	1
Protective Services	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Paraprofessionals	0	1	0	0	2	1	0	0	0	0	0	0	0	0	4
Administrative Support	0	0	0	0	1	1	0	0	0	0	0	0	0	0	2
Skilled Craft	0	0	0	0	10	1	0	0	0	0	0	0	0	0	11
Service Maintenance	0	0	0	0	40	34	1	0	0	0	0	0	0	0	75
Total	3	1	0	0	56	41	1	0	2	0	0	0	0	0	104

Figure 8 - 2020 New Hires

Job Category	White		AI/AN		Black		H/L		Asian		NHOP		Multi		Total
	M	F	M	F	M	F	M	F	M	F	M	F	M	F	
Officials/Administrators	0	0	0	0	3	0	0	0	0	0	0	0	0	0	3
Professionals	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Technicians	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Protective Services	0	0	0	0	1	1	0	0	0	0	0	0	0	0	2
Paraprofessionals	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
Administrative Support	0	0	0	0	1	1	0	0	0	0	0	0	0	0	2
Skilled Craft	1	0	0	0	5	1	0	0	0	0	0	0	0	0	7
Service Maintenance	2	1	1	0	37	32	0	0	0	0	0	0	0	0	73
Total	3	2	1	0	47	35	0	0	0	0	0	0	0	0	88

Figure 9– 2021 New Hires

Job Category	White		AI/AN		Black		H/L		Asian		NHOPi		Multi		Total
	M	F	M	F	M	F	M	F	M	F	M	F	M	F	
Officials/Administrators	3	0	0	0	3	2	0	0	2	0	0	0	0	0	10
Professionals	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
Technicians	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Protective Services	0	0	0	0	2	1	0	0	0	0	0	0	0	0	3
Paraprofessionals	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Administrative Support	0	0	0	0	3	1	0	0	0	0	0	0	0	0	4
Skilled Craft	1	0	0	0	8	0	1	0	0	0	0	0	0	0	10
Service Maintenance	1	0	0	0	26	19	0	0	0	0	0	0	0	0	46
Total	5	1	0	0	42	23	1	0	2	0	0	0	0	0	74

DDOT’s concentration of new employees are in the Service-Maintenance category which includes the Transportation Equipment Operations (Bus Drivers). The Skilled Craft category has the second largest concentration of new employees which includes General Auto Mechanics.

These positions are most concentrated because they have the highest number of positions available within the department and have an ongoing recruiting process. Other positions within the Department are subject to the Department needs and budget constraints.

For more details, see [Appendix C](#) – Employees Practices Analysis.

Section 10.3: Promotions & Transfers

Promotions will be proposed in accordance with applicable rules, on a nondiscriminatory basis. DDOT makes written promotional requests to the HR Department. HR would open the promotion to all employees of a named department or named division or to employees holding positions in specific classes, or persons on named preferred eligible list provided that the required minimum period of employment in the classified service. Promotional notices are posted on the city’s website for a period of not less than three (3) business days. Employees are encouraged to apply in response to a posted position. Selection is determined by work performance and qualifications for the new job.

Figure 10– Workforce Demographics Table

Demographics	Percentage of Workforce	Percentage of Promotions
Total Black Employees	96%	100%
Black Males	69%	69%
Black Females	27%	25%
White Males	3%	2.7%
White Females	3%	0%
Total Males	72%	73%
Total Females	28%	25%
Total Hispanic	1%	1.8%
Total AI/AN	1%	0.9%
Total Multi	0%	0%

Between January 1, 2018, and December 31, 2021, DDOT promoted 112 employees. DDOT lacks a clear and consistent method of tracking internal applicants for open positions that prevents identifying if there are potential barriers to promotions. However, there is nothing in DDOT' employment practices that would indicate barriers for promotions for current employees. Therefore, the chart above identifies the "Percentage of Workforce" and that chart below identifies the "Percentage of Promotion" for each major demographic segment of the total workforce.

Figure 11 – Workforce Promotions

Job Categories	White		AI/AN		Black		H/L		Asian		NHOPi		Multi		Total
	M	F	M	F	M	F	M	F	M	F	M	F	M	F	
Officials & Admin	0	0	0	0	0	1	0	0	0	0	0	0	0	0	1
Professionals	0	0	0	0	2	2	0	0	0	0	0	0	0	0	4
Technicians	0	0	0	0	2	1	0	0	0	0	0	0	0	0	3
Protective Service	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Paraprofessionals	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Admin Support	0	0	0	0	3	16	0	0	0	0	0	0	0	0	19
Skilled Craft	3	0	1	0	56	1	2	0	0	0	0	0	0	0	63
Service Maintenance	0	0	0	0	15	7	0	0	0	0	0	0	0	0	22
Total	3	0	1	0	78	28	2	0	0	0	0	0	0	0	112
% Of Promotions	2.7%	0%	0.9%	0%	69.6%	25%	1.8%	0%	0%	0%	0%	0%	0%	0%	100%

Black males make up 69% of the workforce and received nearly 70% (78) of the promotions.

- Within the Professionals category, Black females received 25% (28) promotions.
- Within the Technician category, Black males received two of the three promotions.
- Within the Administrative Support category, Black males received 3 of the 19 promotions, while Black females received 84% (16) of the promotions.
- Within the Skilled Craft category, Black males received 88% (56) of promotions while Black females, Hispanic and white males received less than 1% of the promotions, respectively.
- Within the Service-Maintenance category, Black males received 68% (15) of the promotions while Black females received 32% (7) promotions.

Black females make up 27% of the workforce and received 25% (28) of the promotions. Black females received promotions in the following areas:

- Officials/Administrators (1)
- Professionals (2)
- Technicians (1)
- Administrative Support (16)
- Skilled Craft (1)
- Service-Maintenance (7)

White males make up of 2% of the workforce and received nearly 3% (3) of the promotions in the Service-Maintenance category. There were no promotions in any job category for underutilized White females.

Section 10.4: Terminations

In general, terminations are voluntary or involuntary, as follows:

1. Voluntary Termination – Employees may decide to terminate their employment with DDOT at any time, for any reason, the most common are resignation, retirement, leave of absence and job abandonment (i.e., no call/no show).
2. Involuntary Termination – At times it may be necessary for DDOT to initiate the termination of an employee. Some of the most common causes includes layoff, misconduct, and performance.

Figure 12 – Terminations by Race/Ethnicity

Types of Terminations	White		AI/AN		Black		H/L		Asian		NHOPI		Multi		Total
	M	F	M	F	M	F	M	F	M	F	M	F	M	F	
Voluntary	0	0	0	0	283	158	0	0	0	0	0	0	0	0	441
Involuntary	2	3	0	0	61	24	0	0	0	0	0	0	0	0	90
Total	2	3	0	0	343	182	0	0	0	0	0	0	0	0	531

Figure13 – Terminations by Gender

Types of Terminations	Males	Females	Total
Voluntary	283	158	441
Involuntary	63	27	90
Total	346	185	531

Between January 1, 2018, and December 31, 2021, there were 531 separations. There were 441 voluntary terminations and 90 involuntary terminations. The majority of the involuntary terminations were due to a violation of the Department’s policy and Service Maintenance job category position. The involuntary terminations consisted of 63 Black males and 27 Black females.

Section 10.5: Disciplinary Actions

DDOT has a systematic means of insuring that employee perform within the rules and regulations, policies and directives set forth by the Department and City. Established standards of employee conduct are also those standards of personal behavior set forth in the laws of Michigan and the United States which have consequences regarding safe, orderly, and efficient operation of the Department and those standards of employee conduct.

All disciplinary actions for represented personnel are administered as directed by Collective Bargaining Agreements (CBA), non-represented employees shall be governed by procedures defined in DDOT’s Discipline Policy and Work Rules.

Corrective procedures are administered based on the severity of the violation or performance deficiency. Depending on the nature of the infraction or performance deficiency, as determined by investigation, the following action may be taken:

1. Oral Warning
2. Written Warning
3. Disciplinary Suspension
4. Discharge

Prior to suspending an employee, the Director, Manager, or Supervisor should contact HR Employee Services or the Labor Relations Division to obtain assistance in determining if this action is warranted and consistent with the City of Detroit's policies.

Represented employees are subject to "Rule 9 Suspension and Removal and Removal of Classified Employees." in [Appendix D](#).

DDOT used HR's disciplinary action records from January 2018 to January 2021, to ensure nondiscrimination with its disciplinary practices. For the purposes of this report, DDOT's EEO Officer has identified each type of disciplinary action cross referenced by race and gender.

Most of the disciplinary actions were issued to Black males in the Service-Maintenance job category, the most being Transportation Equipment Operators (Bus Drivers). This is the largest job category for the department and the highest concentration of Black male employees, this does not suggest any discrimination.

Section 10.6: Training

DDOT's training and tuition reimbursement programs are offered to all employees. It is the responsibility of management to provide development assistance by which diverse employees can advance within the department.

Training is offered by the City of Detroit Office of Talent Development and Performance Management. Training courses are offered on an ongoing basis for a variety of positions throughout DDOT and the City of Detroit. Any employee interested in training are allowed to attend, upon the approval of their Manager and availability based on DDOT's manpower needs. See [Appendix E](#) - City of Detroit Office of Talent Development and Performance Management Training Course/Workshop Offerings website.

Formal and informal types of training were tracked for DDOT employees and cross-referenced by gender and race/ethnicity. Please see [Appendix C](#) "Training utilization analysis."

Section 10.7: Compensation and Benefits

Compensation for any position is subject to its classification. Please refer to [Appendix D](#) "Rule 11 Classification". Applicants and employees can see their benefits and compensation on the City of Detroit's Human Resources webpage and the UltiPro Payroll System.

Section 10.8: Seniority Practices

Seniority practices affecting the union-represented employees are agreed to in each Collective Bargaining Agreement. Please see [Appendix D](#) "Rule 8 Seniority" for the rules regarding reduction in force and reemployment rights of employees.

Section 10.9: Individual with Disabilities and Veterans

To determine any potential impact of DDOT's employment practices on persons with disabilities and veterans, DDOT's EEO Officer requested the number of applicants for employment and promotions in each job category and the number of hired and promoted, cross-referenced by sex and race from the City's HR Recruitment Department. HR Recruitment only ask applicants or employees to self-identify their status as veterans and/or disabled, however, it is not required.

Therefore, DDOT compared the number of applicants for employment and promotions in each job category, who declared to be an individual with disabilities and veterans. The applicants were cross-referenced by sex and race, if known. To view the current utilization of employees by job group who self-identified as disabled or veterans, please see [Appendix C](#) for DDOT's Hires and Promotions and Transfer utilization analysis.

Section 11: Monitoring and Reporting

DDOT has implemented a process system that periodically reviews the effectiveness of their EEO Program. This system includes the following:

- Periodically monitoring the progress toward EEO Program goals
- Periodically monitoring of DDOT's Employee policies and procedures
- Periodically reviewing with HR Recruiter and Employee Services records pertaining to hiring, promotions and terminations
- Advising top management and supervisors of the EEO Program effectiveness
- Reviewing and monitoring federally funded contractors EEO Program or Affirmative Action Plan
- Developing corrective action to address underutilization issues; and
- Reviewing and timely addressing all filed EEO complaints.

The EEO Officer is responsible for executing these monitoring and reporting responsibilities.

Section 12: EEO Complaints Procedure

The EEO complaint procedure outlined below will address discrimination regarding race, color, religion, national origin, sex, age, genetic information, disability, veteran status, or other protected class.

Complaint Procedures are as follows:

1. The EEO Officer will receive all written complaints of discrimination. These complaints may be direct from the employee or referred from a Supervisor or Manager who has received a complaint from an employee.
2. All discrimination complaints filed under this procedure will be accepted for investigation up to and including 30 days after the date of the alleged discriminatory act.
3. All complaints will be properly recorded and signed by the complainant.
4. All complaints will be investigated and processed by the EEO Officer within 30 days of receipt.

5. The complainant will receive written notification regarding the results of the investigation and the final disposition of the complaint including remedial action to be taken.
6. If the complainant disagrees with the findings and decisions of the EEO Officer, Employers will be advised that the City of Detroit Civil Rights, Inclusion and Opportunity (CRIO) is another avenue of filing a complaint.
7. The EEO Officer will take necessary steps to ensure the confidentiality of all discrimination complaint records and of any counseling done during the complaint procedure.

Section 13: 2018-2021 Program Goals & Corrective Action Plan

The 2018-2021 EEO Program hiring goals was not met for the following reasons:

1. The 2018-2021 EEO hiring goals were not realistically set.
2. Potential applicants (White females) have not considered DDOT employment as a viable career choice.
3. Potential applicants (white females) requested salaries that exceeded the offered salary maximum.
4. Potential applicants are unable to meet the job requirement(s) for various reasons (i.e., valid license, education, drug screening, etc.).
5. The Coronavirus Pandemic of 2020 caused recruitment and hiring challenges.

Despite these challenges, DDOT plans to achieve parity primarily through job vacancy recruitment to increase the pool of qualified minority and female applicants.

The EEO Officer has reviewed and concur with DDOT's hiring and promotion process and employment documents to ensure the actions of the Department are not discriminatory (i.e., do not result in disparate treatment or disparate impact).

DDOT's EEO Officer summarized the utilization data for each job category to determine the employment groups with low participation rates. The utilization reports identified areas where problems may exist. Hiring goals and a timetable was set and new recruitment efforts to meet the hiring goal within the next four years.

The EEO Officer conducted an analysis of employment practices to ascertain whether our employment practices are contributing to underutilization or concentration. The new hiring goal will be used to correct the causes of underutilization of minorities and women within DDOT.

After a review of DDOT's utilization statistical reports and employment practices, there does not appear to be any discrimination or potential disparate impact on any minority racial group or protected class within DDOT's workforce.