



EQUAL EMPLOYMENT
OPPORTUNITY PROGRAM
2016 - 2018

Effective July 15, 2016

42 Sumner Drive, Dover, NH 03820



TABLE OF CONTENTS

I.	Statement of Policy	3
II.	Dissemination	5
III.	Designation of Personnel and Responsibility	7
IV.	Utilization Analysis	9
V.	Goals and Timetables	11
VI.	Assessment of Employment Practices	14
VII.	Monitoring and Reporting	22

APPENDICES

- A – COAST Organizational Chart
- B – COAST Positions and Duties
- C – COAST Workforce Utilization & Availability Analysis, June 1, 2016
- D – COAST EEO Goals and Timetables
- E – COAST Employment Application



EQUAL EMPLOYMENT OPPORTUNITY PROGRAM

I. STATEMENT OF POLICY

The Cooperative Alliance for Seacoast Transportation (COAST) provides Demand Response, Commuter, and Fixed Route Transit services for 12 communities in Strafford and Rockingham Counties, New Hampshire, and York County, Maine. Our mission is to champion and provide customer-focused public transportation with a commitment to excellence in safety and service. We are committed to meeting the diverse needs of the community while exceeding customer expectations in a cost-effective and responsible manner. COAST employees are professional, knowledgeable, and proud to serve our customers. In the exercise of this Mission Statement we are committed to Equal Employment Opportunities throughout our organization.

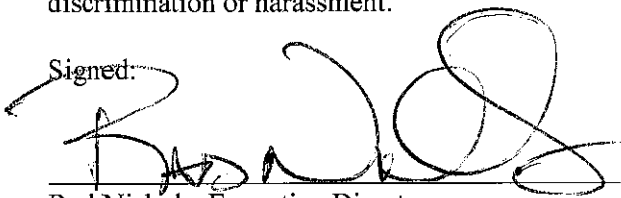
COAST employees and applicants for employment are protected by federal laws, Presidential Executive Orders, and state and local laws designed to protect employees and job applicants from discrimination on the bases of race, ethnicity, religion, color, sex (including pregnancy, gender identity, and sexual orientation), marital status, parental status, national origin, age (40 years of age or over), disability (physical or mental), genetic information. It is also COAST's policy to prohibit discrimination based on political affiliation, military service, or any other non-merit based factors. These protections extend to all management practices and decisions, including recruitment and hiring practices, appraisal systems, promotions, and training and career development programs.


Heather Hesse-Stromberg, Director of HR & Compliance, has been appointed to serve as COAST's EEO Officer and will be responsible for ensuring that we comply with all EEO requirements and responsibilities.

We are committed to an Affirmative Action Program, including goals and timetables, for good-faith efforts to achieve full utilization of minorities and women at all levels of COAST's workforce where deficiencies may exist. The successful achievement of EEO goals will provide benefits to COAST through fuller utilization and development of previously underutilized human resources.

All COAST Managers and Supervisors share in this responsibility and will be assigned specific tasks to assure compliance is achieved through understanding, communicating, and active involvement in the support of this policy. Managers' and Supervisors' performance toward achieving measurable EEO outcomes is assessed during the annual review cycle in the same way as their performance on other COAST goals.

Applicants and employees have the right to file complaints alleging discrimination with the appropriate official(s). All such reports will be thoroughly investigated. No adverse action or retaliation will be taken or permitted against any employee who reports issues of workplace discrimination or harassment.

Signed: 
Rad Nichols, Executive Director


Date

This policy extends to all areas of employment including recruitment, selection and placement, compensation, promotion, transfer, discipline, demotion, lay-off, termination, training, daily working conditions, benefits and all other terms and conditions of employment:

Authorities

- Title IX of the Education Amendments of 1972, as amended, 20 U.S.C. §§ 1681 et seq.
- Equal Pay Act of 1963, as amended, 29 U.S.C. § 206
- Age Discrimination in Employment Act of 1967, as amended, 29 U.S.C. § 621 et seq.
- Sections 503 and 504 of the Rehabilitation Act of 1973, as amended, 29 U.S.C. § § 794
- Uniformed Services Employment and Reemployment Rights Act of 1994 (USERRA), as amended, 38 U.S.C. §§ 4301 et seq.
- Americans with Disabilities Act of 1990, as amended, 42 U.S.C. § 12101 et seq.
- Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000d et seq.
- Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e et seq.
- Title II of the Genetic Information Nondiscrimination Act of 2008, as amended, 42 U.S.C. § 2000ff et seq.
- Federal Transit Laws, 49 U.S.C. § 5301 et seq.
- 28 C.F.R. Part 42, Subpart F, Coordination of Enforcement of Nondiscrimination in Federally Assisted Programs
- 29 C.F.R. Part 1605, Guidelines on Discrimination Because of Religion
- 29 C.F.R. Part 1606, Guidelines on Discrimination Because of National Origin
- 29 C.F.R. Part 1607, Uniform Guidelines on Employee Selection Procedures
- 29 C.F.R. Part 1620, The Equal Pay Act
- 29 C.F.R. Part 1625, Age Discrimination in Employment Act
- 49 C.F.R. Part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation-Effectuation of Title VI of the Civil Rights Act of 1964
- 49 C.F.R. Part 27, Nondiscrimination on the Basis of Handicap in Financial Assistance Programs
- Executive Order 11246, Equal Opportunity in Federal Employment (September 24, 1965)
- DOT Order 1000.12, "Implementation of the Department of Transportation Title VI Program," (January 19, 1977)
- DOT Order 1000.18, "External Civil Rights Complaint Processing Manual," (September 2007)
- FTA Master Agreement

This policy will be updated a minimum of every three (3) years. Supervisors and Managers will meet at least twice a year to discuss compliance with this program and EEO implementation progress. COAST will meet yearly with minority and female employees to obtain suggestions on EEO program implementation. All new hires will receive training on EEO during their orientation. A copy of this policy is in the employee handbook, on employee notice boards, and posted on COAST's website.

II. DISSEMINATION

COAST exceeds established threshold criteria governing Equal Employment Opportunity (EEO) program requirements and reporting processes. According to the U.S. Department of Transportation's UTMA C 4701.1 circular dated July 26, 1988, public transit agencies receiving Federal funding assistance in excess of \$1 million in the previous Federal Fiscal Year and employing 50 or more transit-related employees must prepare, implement and evaluate a formalized EEO plan.

Formalized communication mechanisms have been established to publicize and disseminate COAST's EEO Policy, as well as appropriate elements of the program, to its employees, applicants, and the general public. Formalized communication mechanisms have been divided into two primary categories: External Dissemination and Internal Dissemination.

To ensure that all members of the staff are cognizant of our equal employment opportunity policy and their individual responsibilities in carrying out this policy, the following communication efforts will be made:

External Dissemination

COAST shall disseminate its EEO policy and programs to regular recruitment sources and community organizations, such as:

- a. Employment agencies, educational institutions; minority, disabled, and women's organizations; civil rights organizations, community action groups, training organizations, and others who refer applicants.
- b. Public media sources, especially radio and television stations, newspapers, magazines, and other journals (especially those oriented to the disabled and minority populations). All advertisements for personnel will include a statement that COAST is an "EEO employer".
- c. COAST's EEO/AA Policy is posted on our website and an EEO statement is part of all employment applications.

Internal Dissemination

- a. Managers and Supervisors shall be fully informed of the agency's policy through:
 - i. Written communication from the Executive Director or their designee;
 - ii. Inclusion of the EEO program and policy in COAST's employee handbook; and
 - iii. Meetings held (e.g., at a minimum annually) to discuss the EEO program and its implementation.
- b. Non-supervisory staff shall be informed of the agency's EEO policy and program through:
 - i. Posting official EEO posters and the policy statement on bulletin boards, in the common area(s) of COAST's facilities and on the COAST website;
 - ii. Including the EEO policy in the employee handbooks and reports;
 - iii. Meeting with minority and female employees to get their suggestions in implementing and refining the EEO program; and

- iv. Presentation and discussion of the EEO program as part of the employee orientation and in all training programs.

The dissemination of COAST's EEO/AA policy is not limited to the above referenced items. As considered appropriate, COAST utilizes whatever means necessary to convey the organization's commitment to equal employment opportunity.

III: DESIGNATION OF RESPONSIBILITIES

Overview of Designation:

The Executive Director, Rad Nichols, shall be the EEO Director and shall have the ultimate authority and responsibility for the implementation of the EEO Program. The Director of HR & Compliance, Heather Hesse-Stromberg, has immediate and continuing administrative responsibility and authority, which is delegated by the EEO Director. As COAST's EEO Officer, Ms. Hesse-Stromberg will coordinate and administer the day-to-day operation of the EEO Plan. All COAST Managers and Supervisors share in the responsibility of ensuring compliance is achieved through understanding, communication, and active involvement in the support of this policy. Performance evaluations of Managers and Supervisors shall include an assessment of achievement of measurable EEO outcomes.

Essential to the effectiveness of COAST's EEO Program, the EEO Director and Officer must be:

- a. sensitive to, and aware of, the varied ways in which discrimination occurs;
- b. totally committed to the EEO program goals and objectives;
- c. knowledgeable of civil rights precepts, policies, rules, regulations, and guidelines; and
- d. entrusted with sufficient authority and ability to work and communicate with others (e.g., department heads) to achieve EEO goals and objectives.

Responsibilities

1. EEO Director responsibilities may include:
 - a. Actively participating in periodic audits of all aspects of employment in order to identify and remove barriers obstructing the achievement of specified goals and objectives.
 - b. Assisting in identifying problem areas and establishing agency goals and objectives.
 - c. Holding regular discussions with managers, supervisors and employees to ensure the organization's policies and procedures are being followed.
 - d. Participating in the review and/or investigation of complaints alleging discrimination.
2. EEO Officer responsibilities may include:
 - a. Developing, amending and recommending an EEO policy and program, including internal and external communication procedures;
 - b. Concurring in all hires and promotions;
 - c. Assisting management in collecting and analyzing employment data, identifying problem areas, setting goals and timetables, and developing programs to achieve goals.

- d. Designing, implementing, and monitoring internal audit and reporting systems to measure program effectiveness, and to determine where progress has been made and where further action is needed.
 - e. Reporting periodically to the Executive Director on progress in relation to COAST's goals.
 - f. Serving as liaison between COAST, Federal, State, and local governments, regulatory agencies; minority, disabled and women's organizations; and other community groups.
 - g. Assuring that current legal information affecting affirmative action is disseminated to responsible officials.
 - h. Processing employment discrimination complaints.
 - i. Ensuring that all department managers and supervisors are aware of the details of the EEO Program.
 - j. Advising the COAST Board of Directors on EEO compliance issues.
 - k. Supporting career counseling for all employees.
3. All Managers' duties may include:
- a. Assisting in identifying problem areas and establishing COAST's goals and objectives.
 - b. Reviewing the qualifications of all employees to assure that minorities, disabled persons, and women are given full opportunities for transfers, promotions, training, salary increases, and other forms of compensation.
 - c. Participating in periodic audits to ensure that each department is in compliance (e.g., EEO posters are properly displayed on all employee bulletin boards).

IV. UTILIZATION ANALYSIS

1. Purpose

The purpose of the utilization analysis is to identify those job categories where there is an underutilization or concentration of minorities and women in relation to their availability in the relevant labor market. It is also to establish the framework for goals and timetables and other actions to correct employment practices that contributed to underrepresentation or concentration.

A utilization analysis consists of a workforce analysis and an availability analysis. The workforce analysis requires a statistical breakdown of COAST's job categories (utilizing the EEO job categories) cross-referenced by race and sex. This analysis should be structured in lines of progression by departmental units to ensure that promotional opportunities will be considered. Principle duties and rates of pay must be indicated for each EEO job category and job title for each employee. The availability analysis compares the participation rate of minorities and women with their availability.

2. COAST Workforce Utilization & Availability Analysis Charts

Please see the Appendices that describe the following:

- Appendix B shows COAST Positions & Duties including EEO-1 job categories, positions/titles, departments, principle duties, and pay rates.

COAST employs individuals in the job categories of Officials and Managers, Administrative Support Workers, Craft Workers, Operatives and Laborers. There are five (5) departments within COAST: Administration, Operations, Coordination, Maintenance and TMA. Rates of pay, including the classification of pay (salary or hourly), for each job position/title is included.

- Appendix C shows COAST's Workforce Utilization and Availability Analysis

The US Census Bureau's EEO-2010 dataset was used for Strafford and Rockingham Counties, New Hampshire and York County, Maine which comprise the vast bulk of the geographic area from which COAST recruits its employees at all levels.

Using the whole person method to calculate the goal for each job category, broken out for minority and female employment, the analysis shows underutilization in three job categories.

Administrative Support Workers, of which there are currently six (6) employees, three (3) are white, non-Hispanic or Latino males and three (3) are white, non-Hispanic or Latino females. The availability of females in this job category is 67.6% and indicates that COAST should be striving to achieve the goal that at least one more of these employees is a qualified female.

Operators, of which there are currently fifty-four (54) employees, thirty-three (33) are white, non-Hispanic or Latino males, one (1) is a Hispanic or Latino male, two (2) are of Two or more races, seventeen (17) are white, non-Hispanic or Latino females, and one (1) is a Black/African American female. The availability of females in this job category is 22.5%. The availability of minorities in this job category is 9.5% and indicates that COAST should be striving to achieve the goal that at least one more of these employees is a qualified minority.

Laborers, of which there are currently nine (9) employees, eight (8) are white, non-Hispanic or Latino males and one (1) is a Hispanic or Latino male. The availability of females in this job category is 16.3% and indicates that COAST should be striving to achieve the goal that at least one of these employees is a qualified female.

No underutilizations of minority-group male or minority-group female employees were found as a result of the workforce utilization and availability analysis.

No concentrations of minority-group males or minority-group females were found as a result of the workforce utilization and availability analysis.

There was a concentration of female employees found in the Operatives category by five (5) females.

V. GOALS AND TIMETABLES

1. Purpose

Goals and timetables are excellent management tools to assist in the optimum utilization of human resources. The objective is parity in the workforce by eliminating underrepresentation within each federal EEO category. Specific and detailed percentage and numerical goals with timetables must be set to correct any underutilization of specific affected classes of persons identified in the utilization analysis. Short-term goals (to be obtained within the next 12 months) should be set and pursued in order to ensure accomplishment of long-range goals. Usually, long-range goals (to be obtained in four to five years) will be designed to eliminate underutilization in job categories where it has been identified.

If goals and timetables are not met, there is an obligation to explain what efforts were taken to meet the goal and fully explain and justify why the goal was not met. The justification for failing to meet a goal(s) should address such factors as: whether the anticipated job openings materialized, the availability of persons whose employment could have resulted in the goal(s) being achieved, and the adequacy of recruitment and other affirmative actions to change existing employment practices so that the goal(s) could be achieved.

Long-range goals are usually stated as percentages, although numerical projections are recommended where feasible. Such goals should consider the fact that availability of traditionally underutilized or underemployed groups is not constant. Future projections should be taken into consideration.

Short-term goals should be stated as both actual numbers and percentages and should be set and pursued in order to assure accomplishment of long-range goals. Short-term goals represent the net increase in minority and/or women's employment in a particular job category within the next 12 months. Short-term goals should be based on anticipated job openings, job group availability, and the long-range goals set for minorities and/or women in the particular job category. Projections of vacancies should also be established in order to determine which vacancies can be filled immediately by underutilized persons and the possibilities of these persons being promoted into upper-level positions in terms of long-range goals.

In developing goals and timetables to correct underutilization, COAST uses the following guidelines for goal-setting:

- a. Involve human resource staff and department managers in the process.
- b. Set goals that are significant, measurable, and attainable.
- c. Make goals with timetables specific for planned results.
- d. Consider anticipated attrition, expansion, turnover in the work force, and availability of persons with required skills.

- e. Consider effects of changes in existing employment practices that may contribute to underutilization in increasing availability of minorities and women.
- f. Goals should not be rigid and inflexible, but must be targets reasonably attainable by applying every good faith effort to make all aspects of the affirmative action program work.

2. COAST Goals & Timetables

COAST's overarching goal is to achieve a workforce in which there are no cases of underutilization or concentrations of minority or women employees in any EEO-1 job category within the organization. Please refer to Appendix C, COAST's Workforce Utilization and Availability Analysis, and Appendix D, COAST's Goals and Timetables, for more specific information.

The recently completed workforce utilization and availability analysis has shown the following results, by category:

- a. Officials & Managers – The analysis shows there are no cases of underutilization or concentration of minority-group or female employees in this job category. There are no short-term or long-term openings expected in this job category.
- b. Professionals – The analysis shows there are no cases of underutilization or concentration of minority-group or female employees in this job category. There is a short-term opening expected in this job category and, given the high percentage of available females in this category, COAST will seek a qualified female employee when the next opportunity arises.
- c. Administrative Support Workers – The analysis shows an underutilization of female employees in this job category. There are no short-term openings expected in this job category. Long-term, one opening is anticipated in this job category and COAST will seek a qualified female employee when the next opportunity arises.
- d. Craft Workers – There are no cases of underutilization or concentrations of minority-group or female employees in this job category. There is an ongoing opening in this job category and there have been very few applicants.
- e. Operatives – There are no cases of underutilization or concentrations of minority-group in this job category. However, there is a concentration of female employees in this category. There are typically 1-3 openings in this job category every quarter as this is the one job category in which there is notable turnover. There are no plans to add additional positions either short-term or long-term. Any new hires will be due to normal turnover and minority candidates will be sought for these positions.

- f. Laborers – The analysis shows underutilization of female employees in this category. There are typically openings in this job category and COAST is always looking for female candidates for this position. We rarely have females apply as these positions are part-time (average 5-10 hours/week), evening positions and seasonal weather changes affect the attractiveness of the job.

VI. ASSESSMENT OF EMPLOYMENT PRACTICES

1. Purpose

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

a. Applicants, Hires, Promotions and Disciplinary Actions

The following table represents all applicants and hires from June 1, 2014 through June 1, 2016 by EEO-1 Job Category, race and sex. Applicant numbers appear in parenthesis with hired numbers bolded. Applicants whose race is unknown either declined to complete EEO tracking paperwork or left it blank.

Job Category	White Male	White Female	Male, Race Unk.	Female, Race Unk.	Male Other Race	Female Other Race
Officers & Managers	(0)	(2) 1	(0)	(0)	(0)	(1)
Administrative Support Workers	(0)	(5) 1	(0)	(0)	(0)	(0)
Craft Workers	(2) 1	(0)	(0)	(0)	(0)	(0)
Operative	(36) 8	(18) 6	(8)	(0)	(0)	(0)
Laborer	(2) 2	(1)	(1)	(0)	(3) 1	(0)

The following table represents all individuals who have applied for a promotion June 1, 2014 through June 1, 2016, and the number who were promoted, by race and sex.

	Applied For Promotion	Were Promoted
White Male	13	3
White Female	4	2
Male, Race Unknown	0	0
Female, Race Unknown	0	0
Male, Other Race	0	0
Female, Other Race	0	0

The following table represents the numbers and types of disciplinary actions by race and sex since January 1, 2014:

Disciplinary Action	White Male	White Female	Male, Race Unk.	Female, Race Unk.	Male Other Race	Female Other Race
Verbal Warning	8	2	0	0	1	0
Written Warning	9	5	0	0	0	0
1 Day Suspension	3	4	0	0	0	0
2 Day Suspension	1	0	0	0	0	0
3 Day Suspension	1	1	0	0	0	0
4 Day Suspension	0	0	0	0	0	0
5 Day Suspension	1	0	0	0	0	0
6 Day Suspension	1	0	0	0	0	0
Administrative Leave	0	0	0	0	0	0
Termination	9	1	0	0	0	0

2. Employment Practices

- a. Application Procedures – Copies of COAST’s application for employment (Appendix E) can be printed off the COAST web site, obtained through the mail or by visiting the COAST Administrative Office, or can be emailed to prospective candidates. COAST’s application procedure includes the completion and submittal of the four (4) page application for employment and one (1) page EEO Voluntary Self-Identification Form. Applicants for administrative support, officials and managers, and professionals positions may also be requested to submit a resume. Completed applications are submitted to the EEO Officer to separate the EEO Self-Identification Form and track applicants’ demographic information.

There are no known instances when the application procedures utilized by COAST have been identified as a barrier to employment. Currently COAST formally tracks the applications received for position openings, and tracks them by race/ethnicity and gender. Additionally, COAST tracks qualified applicants hired, categorized by EEO-1 job classification, race/ethnicity and gender.

- b. Types of Disciplinary Actions – COAST's own best interest lies in ensuring fair treatment of all employees and in making certain that disciplinary actions are prompt, uniform, and impartial. COAST values the use of effective counseling, training, and discussion in the resolution of concerns before the use of disciplinary actions. The major purpose of any disciplinary action is to address and document the problem, prevent recurrence, and prepare the employee for satisfactory service in the future.

COAST's policy for disciplinary action was created to state the organization’s position on administering equitable and consistent discipline for unsatisfactory conduct in the workplace. The best disciplinary measure is the one that does not have to be enforced and comes from good leadership and fair supervision at all employment levels. The overall performance history of the employee, as well as the nature, severity, and/or frequency of infraction(s) will influence the action(s) to be taken.

Disciplinary actions may be any of the following: verbal warning, written warning, suspension with or without pay, or termination of employment. Disciplinary action will usually be carried out in a progressive manner in the order noted above. Typically the progressive nature of discipline will be applied to events or infractions within a 12 month or 365 day window.

COAST recognizes that certain types of employee problems are serious enough to justify a suspension, or, in extreme situations, termination of employment, without going through the usual progressive discipline steps.

Employment with COAST is based on mutual consent and both the employee and COAST have the right to terminate employment at will, with or without cause or advance notice, and COAST may impart disciplinary action at its discretion.

There are no known instances when disciplinary actions taken by COAST have been identified as a barrier to employment. Currently COAST formally tracks disciplinary actions by type, EEO-1 job category, race/ethnicity and gender.

- c. Promotion Procedures – COAST’s policy on job posting provides employees the first opportunity to indicate their interest in open positions and advance within the organization according to their skills and experience. In general, notices of all job openings are posted, although COAST reserves its discretionary right not to post a particular opening. Each job posting will include the dates of the posting period, job title and description including essential duties and qualifications (required skills and abilities).

To be eligible to apply for a posted job, employees must have performed competently for at least 90 calendar days in their current position. If an employee has a written warning on file, or is on probation or suspension, he/she will not be considered eligible to apply for posted jobs. If an employee is interested in applying for an open position, he/she should speak with the Director of HR & Compliance and will be asked to indicate their interest in writing. The employee’s direct supervisor may be contacted to verify performance, skills, and attendance. Any other circumstances that might affect a prospective transfer may also be discussed.

COAST recognizes the benefit of developmental experiences and encourages employees to talk with their supervisors about their career plans. Supervisors are encouraged to support employees' efforts to gain experience and advance within the organization. Job posting is a way to inform employees of openings and to identify qualified and interested applicants. Other recruiting sources may also be used to fill open positions in the best interest of the organization.

There are no known instances when promotion procedures have been identified as a barrier to employment. Currently COAST formally tracks promotions by EEO-1 job category, race/ethnicity and gender.

- d. Training Opportunities – COAST encourages employees to take advantage of professional development opportunities to further their skills in their professional area of responsibility. All training is paid at an employee’s normal rate.

All staff in the Laborer, Operatives and Craft Workers job categories participate in specific training programs for their positions and roles within the organization. The expectation is that all employees in each of these job categories participate fully in the respective training programs as developed and implemented. Employees are trained to proficiency and adequate time and resources are

dedicated to promote success. Operatives are encouraged to participate in professional development opportunities through peer training and supervisor-in-training programs. Selections for these opportunities are made based on an employee's ability to meet the qualifications as set and published for these programs.

Workers in Administrative Support, Executive and First/Mid-Level management levels participate in select mandatory training programs and are encouraged to seek out further training in specific areas related to their position and roles in the organization. Leadership development training is encouraged and supported for all Executive and First/Mid-level employees as well as select Administrative Support staff.

Operatives (bus operators) & Craft Workers (mechanics) must have all current applicable professional credentials in order to be considered qualified for employment. For bus operators this includes a valid commercial driver's license (CDL) (minimum class B) and both air brakes and passenger endorsements. For mechanics this includes a valid commercial driver's license (CDL) (minimum class B) and both air brakes and passenger endorsements, as well as all standard hand tools required to perform the job and experience in the use of the tools. The requirement for bus operators to have these credentials may pose a barrier to employment for some potential applicants. New Hampshire requires both a general knowledge and road skills test to obtain endorsements. COAST is not positioned to train potential employees to obtain CDLs and endorsements. Bus operators not possessing the appropriate endorsements will be considered for Demand Response operator positions. The requirements for mechanics have not been known to present a barrier to employment. Corrective actions will be investigated and evaluated for this employment practice.

There are no other known instances when training opportunities, or a restriction to them, have been identified as a barrier to employment at COAST. Currently COAST formally tracks all trainings completed by employees.

e. Other Employment Practices

1. Recruitment Process

COAST's recruitment process involves advertising externally for a position. Currently positions are advertised on COAST's web site, the state transit association web site, the New Hampshire Center for Nonprofits web site, New Hampshire and Maine's Employment Security web sites and Indeed.

This employment practice is not seen to pose a barrier to employment.

2. Position Descriptions

COAST maintains job descriptions to identify the requirements of each position, establish hiring criteria, orient new employees to their jobs, set standards for employee performance evaluations and to establish a basis for making reasonable accommodations for individuals with disabilities.

Job descriptions at COAST are written to clearly define the following: expectations, essential and other duties and functions of the position, safety duties, mental and physical requirements, environmental conditions, and the minimum qualifications (e.g., education, experience, language skills, mathematical skills, reasoning ability and any certifications) specifically associated with the position.

The pertinent COAST administrative staff prepares job descriptions when new positions are created. Existing job descriptions are also reviewed and revised periodically in order to ensure that they are up to date. Job descriptions may also be rewritten periodically to reflect any changes in the position's duties and responsibilities. Job descriptions do not necessarily cover every task or duty that might be assigned and additional responsibilities may be assigned as necessary.

This employment practice is not seen to pose a barrier to employment.

3. Interview Procedures

Interviews at COAST are conducted in the form of conversations, during which an applicant and COAST staff can feel more comfortable exploring whether a potential good employment match may exist. Interviewers are provided with a suggested list of questions so they can be consistent in the information they gather. Responses to these questions and any additional notes are to be recorded.

Qualified applicants, as determined by their job application and any other supporting documents provided, will be scheduled for an interview with the supervisor of the position for which they are applying. It is common for an additional COAST employee to take part in this interview, although this person should not be an individual that might ultimately be supervised by the applicant. When it is determined that an applicant for an Executive, First-Mid-Level or Administrative Support position is a good match, a second interview will be arranged, where a more in-depth and specific discussion of the position, the individual's strengths and potential challenges, and employment goals. Operatives who are believed to be a good match are called back for a skills assessment prior to any employment action.

All interviewers at COAST undergo training to ensure that they are adequately prepared to take part in interviews and follow all company policies.

This employment practice is not seen to pose a barrier to employment.

4. Selection Standards & Procedures

Upon completion of the interview process, an overall evaluation of the candidate is conducted by the interviewer(s) based on the information presented in the application, any other materials supplied, and information obtained during the interview(s). An offer of employment will be made to the candidate determined to be most advantageous to COAST based on this evaluation.

An offer of employment is outlined in writing and a mutually agreed upon start date will be identified. The offer is always contingent upon the following items being verified acceptable to COAST (the combination of these items may vary based on position): employment history check, motor vehicle record check, social security number verification, criminal background check, Fraud & Abuse Control checks, DOT drug and alcohol testing history check, and a verified negative pre-employment drug screen. Results of any requested background checks must be received prior to the employee's start date.

COAST's staff has been educated on our EEO Program to ensure goals are being considered and met as a part of the selection process.

This employment practice is not seen to pose a barrier to employment.

5. Wage & Salary Structure (Salary Administration)

The salary administration program at COAST was created to achieve consistent pay practices, comply with federal and state laws, mirror our commitment to equal employment opportunity, and offer competitive salaries within our labor market. Because attracting and retaining talented employees is critical to our success, COAST is committed to paying its employees equitable wages that reflect the requirements and responsibilities of their positions and are comparable to the pay received by similarly situated employees in other organizations in the area.

Compensation for every position is determined by several factors, including job analysis and evaluation, the essential duties and responsibilities of the job, and salary survey data on pay practices of other employers. COAST periodically reviews its salary administration program and restructures it as necessary. Merit-based pay adjustments may be awarded in conjunction with superior employee performance documented by the performance evaluation process for employees who are not transit operators. Incentive bonuses and other adjustments may be awarded to employees meeting defined goals.

This employment practice is not seen to pose a barrier to employment.

6. Seniority Practices

Seniority is recognized at COAST for the purposes of setting operator, dispatcher and utility cleaner pay rates; operators picking their work schedules; and is part of the consideration in the case of layoffs. Seniority is established as the date an employee starts their full or part-time position. An employee's seniority date may change based on changes in employment status (i.e., an operative changing from part-time to full-time employment will have their seniority date changed to the date they committed to full-time employment with the organization).

This employment practice is not seen to pose a barrier to employment.

7. Resignations/Terminations/Layoffs

Termination of employment is an inevitable part of personnel activity within any organization, and many of the reasons for termination are routine. Below are examples of some of the most common circumstances under which employment is terminated:

- Resignation - voluntary employment termination initiated by an employee.
- Termination - involuntary employment termination initiated by the organization in accordance with COAST's policy on disciplinary action and COAST's at-will policy.
- Layoff - involuntary employment termination initiated by the organization for non-disciplinary reasons.

Layoffs have never been used at COAST. Should layoffs be considered necessary, they will be reviewed and implemented based first on an employee's documented overall performance record and second on seniority.

Since employment with COAST is based on mutual consent, both the employee and COAST have the right to terminate employment at will, with or without cause, at any time.

This employment practice is not seen to pose a barrier to employment.

VII. Monitoring and Reporting System

COAST has set up an effective and workable internal monitoring and reporting system that will serve the following basic purposes:

1. Assessing EEO accomplishments;
2. Enabling COAST to evaluate the EEO program during the year and to take any necessary corrective action regarding the development and execution of programs or goals and timetables;
3. Identifying those EEO-1 job categories or departments which have failed to achieve a goal or to implement affirmative action; and
4. Providing a precise and factual database for future projections.

The reporting system will provide documentation to support actions that affect minority and female job applicants or employees. Management will be kept informed of program effectiveness.

To accomplish this, COAST will adhere to the following practices:

1. The EEO Officer will look at applicants, employees, promotions and disciplinary actions in each EEO-1 job category by race, national origin and sex.
2. EEO progress is reviewed at least semi-annually by the EEO Director and EEO Officer, and shared among COAST management. This process allows COAST to take corrective action in its EEO practices throughout the year, if necessary.
3. After review of the categories above, the EEO Officer will prepare a report for the EEO Director that assesses accomplishments or shortfalls. These reports will serve as a basis for adjustments in goals and timelines.

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APPENDIX A

COAST ORGANIZATIONAL CHART

APPENDIX B

COAST POSITIONS AND DUTIES

APPENDIX B: COAST Positions & Duties

COAST Positions & Duties				Pay Rates		
Job Category	Position/Title	Dept	Principle Duties	Hrly/Sal	Low	High
Officials and Managers	Executive Director	Admin	Chief Executive for entire organization	S	\$90,000	\$100,000
	Director of Operations	Ops	Oversees operations and planning activities	S	\$75,000	\$85,000
	Director of HR & Compliance	Admin	Civil Rights & Employment Law compliance and HR oversight	S	\$60,000	\$75,000
	Bookkeeper/Office Manager	Admin	A/P, grants management, administrative functions	S	\$40,000	\$50,000
	Manager of Community Transportation	Coord	Oversees Regional coordination program Call Center operations	S	\$55,000	\$65,000
	Manager of Fleet Maintenance	Maint	Oversees fleet, facility & equipment maintenance	S	\$70,000	\$85,000
	TMA Manager	TMA	Transp. demand management, outreach & marketing	S	\$55,000	\$60,000
Professionals	Safety & Training Officer	Ops	Trainings new staff, Compliance with applicable safety regs	S	\$40,000	\$50,000
Technicians	NONE					
Sales Workers	NONE					
Administrative Support Workers	Community Transportation Supervisor	Coord	Oversees enrollment and operations of Call Center	S	\$35,000	\$45,000
	Demand Response Administrator	Ops	Oversees ADA application, eligibility and redetermination	H	\$16.00	\$18.55
	Dispatcher	Ops	Responsible for vehicle and driver assignments	H	\$15.00	\$18.65
	Receptionist/Administrative Assistant	Admin	Oversees office functions and pass sales	H	\$13.00	\$15.00
	Reservationist	Coord	Responsible for DR intake and scheduling	H	\$13.95	\$18.65
Craft Workers	Fleet Mechanics	Maint	Responsible for direct maintenance and repair of fleet	H	\$20.00	\$30.00
Operatives	Bus Operators (CDL)	Ops	Responsible for safe operation of CDL fleet vehicles	H	\$14.65	\$18.55
	Bus Operators (non-CDL)	Ops	Responsible for safe operation of non-CDL fleet vehicles	H	\$13.20	\$16.75
	Operations Supervisors	Ops	Oversee day-to-day functions of operations	S	\$39,000	\$50,000
Laborers	Utility Cleaners	Ops	Responsible for nightly fueling, cleaning of fleet vehicles	H	\$11.70	\$14.65
Service Workers	NONE					

APPENDIX C

COAST
WORKFORCE UTILIZATION
&
AVAILABILITY ANALYSIS
JUNE 1, 2016

APPENDIX D

COAST GOALS AND TIMETABLES

APPENDIX E

COAST APPLICATION FOR EMPLOYMENT



Date: _____

Office Use Only: Received Date: _____

AN EQUAL EMPLOYMENT OPPORTUNITY EMPLOYER

COAST is committed to the philosophy that all applicants and employees are entitled to equal employment opportunities and does not discriminate against its applicants or employees because of race, sex, religious creed, national origin, ancestry, sexual orientation, disability, veteran status, age, or any other protected group status.

NOTE TO APPLICANT: Please advise us in advance if you need any type of special accommodation to complete this Application for Employment form or if you need to take any pre-employment test.

Instructions: Please answer all questions. If any question does not apply to you, write "no" or "not applicable" ("n/a").

Please provide at least three (3) references on a separate sheet and attach to this application.

As a matter of policy, COAST consistently checks both educational and employment references of all final candidates. For this reason, it is essential that all information be accurate and complete.

GENERAL INFORMATION

Last Name		First Name			Middle Initial
Current address – Street	Apt. #	City	State	Zip	How long have you lived there?
<i>If you have lived at your current address for fewer than 3 years, please list previous address(es):</i>					
Most recent previous address -- Street	Apt. #	City	State	Zip	How long did you live there?
Previous address -- Street	Apt. #	City	State	Zip	How long did you live there?
Telephone numbers: Home:	Work:		Cell:		
E-mail address:	Are you legally authorized to work in the United States? <input type="checkbox"/> No <input type="checkbox"/> Yes			Are you at least 18 years old? <input type="checkbox"/> No <input type="checkbox"/> Yes	
Have you ever been fired or asked to resign by an employer? <input type="checkbox"/> No <input type="checkbox"/> Yes	If yes, please explain.				
Have you ever been convicted of a felony? <input type="checkbox"/> No <input type="checkbox"/> Yes	If yes, please explain. (Note: a felony conviction is not an absolute bar to employment.)				
Have you ever been arrested for or convicted of a crime that has not been annulled by a court? <input type="checkbox"/> No <input type="checkbox"/> Yes	If yes, please explain.				
Position desired:			Desired pay:	Date you would be available to start:	
I am interested in: <input type="checkbox"/> Full Time <input type="checkbox"/> Part Time (_____ hours per week max)					
How did you find out about this employment opportunity?					
<input type="checkbox"/> COAST website <input type="checkbox"/> Internet <input type="checkbox"/> Employee referral <i>Please specify:</i> _____ <input type="checkbox"/> Sign on street <input type="checkbox"/> Advertisement <input type="checkbox"/> Agency <input type="checkbox"/> Other: _____					
Have you ever worked for COAST before? <input type="checkbox"/> No <input type="checkbox"/> Yes	If so, where?			When?	
Have you ever applied with COAST before? <input type="checkbox"/> No <input type="checkbox"/> Yes	If so, where?			When?	

EMPLOYMENT HISTORY

Please list past jobs in reverse chronological order, starting with your current or most recent position. Be sure to complete all questions for each job. If you are applying for a bus operator position, you must list all employment for the **previous 10 years**, including jobs held while in school or in the military. Please ask for additional form(s) if necessary.

Employer's Name

Address Dates Employed (MO/YR) Salary
From: To: Start: Leave:

Supervisor's Name and Title Supervisor's Phone Number May we contact? Yes No

Position(s) Held – briefly explain your duties, responsibilities and number of people supervised:

Reason for leaving:

Employer's Name

Address Dates Employed (MO/YR) Salary
From: To: Start: Leave:

Supervisor's Name and Title Supervisor's Phone Number May we contact? Yes No

Position(s) Held – briefly explain your duties, responsibilities and number of people supervised:

Reason for leaving:

Employer's Name

Address Dates Employed (MO/YR) Salary
From: To: Start: Leave:

Supervisor's Name and Title Supervisor's Phone Number May we contact? Yes No

Position(s) Held – briefly explain your duties, responsibilities and number of people supervised:

Reason for leaving:

SUMMARY OF QUALIFICATIONS

This space is provided for you to briefly summarize any additional qualifications you believe are important in considering your application.

APPLICANT'S STATEMENT & PRE-EMPLOYMENT INQUIRY RELEASE

I certify that all statements made on this Application for Employment and in any subsequently executed medical questionnaire or any other employment documents are true and correct. I understand that any false information that I give may result in termination of my candidacy or any subsequent employment.

I understand that the Fair Credit Reporting Act, Public Law 91-508, requires that I be advised that routine inquiry may be made during COAST's initial or subsequent processing which will provide applicable information concerning character and general reputation. I also understand that upon written request, additional information as to the nature and scope of the inquiry, if one is made, will be provided to me. I also understand that I am entitled to a free copy of the written report generated by the inquiry, if one is made.

I understand that inquiries will be made concerning my employment and education histories, Social Security number verification, driving records, criminal background, sex offender registry, fraud and abuse, DOT mandated drug and alcohol testing and other related matters. Accordingly, I hereby authorize all former employers and all other public and private concerns to release any and all information maintained by any such employer, concern, agency, or entity concerning my personal history.

In consideration of COAST's acceptance and consideration of my application for employment, I hereby and by these presents do for my heirs, agents, executors, administrators, and assigns, release and forever discharge COAST and all affiliated entities from all claims, demands, damages, actions, and causes of action pertaining to or arising out of COAST's consideration of my application for employment and use, so long as not malicious, of all information obtained in the course or as a result of all inquiries made into my personal history, and release and forever discharge all former employers, and all other public and private concerns from all liability arising out of disclosure to COAST of information pertaining to my personal history, including but not limited to the release of copies of any documents contained in any files maintained by said former employers or other public or private concerns relating in any manner to me.

I acknowledge that any offer of employment is conditioned upon my taking a drug screen and COAST's receipt of satisfactory results of such a test and, if necessary to determine ability to perform essential duties of the position offered, the satisfactory results of a physical examination.

If an employee relationship is established, I understand that such employment is terminable at will by me or COAST, at any time, for any reason, with or without cause, and with or without notice. I also understand that any period of employment is not for a specific duration. In addition, I understand that no one is authorized to make oral exceptions to this policy, and written exceptions are permitted only when the Executive Director of COAST signs them.

I certify that I have read, understand, and agree to the above.

Applicant's Signature: _____ Date: _____

Applicant's Printed Name: _____

Note: This Application for Employment will be considered active for 90 calendar days.
After 90 calendar days, you must reapply for available positions.
Copies of this release shall be as effective as the original.

