



Macatawa Area Express (MAX) Transportation Authority

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# Equal Employment Opportunity Program (EEO)

FY2024

171 Lincoln Avenue  
Holland, Michigan 49423

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## EEO Program Requirements & Elements

FTA requires each applicant, recipient, sub-recipient, or contractor that meets the threshold requirements of FTA Circular 4704.1A (all recipients and state DOTs with 100 or more transit-related employees) to submit an updated Equal Employment Opportunity (EEO) Program on a four-year basis, or as major changes occur in the workforce or employment conditions—whichever comes first.

This program complies with Titles VI & VII of the Civil Rights Act of 1964, Title II of the Genetic Information Nondiscrimination Act of 2008 (GINA), 49 U.S.C. Chapter 53 (the Federal Transit law), other Federal civil rights statutes, and the U.S. Department of Transportation (DOT) regulations in 49 CFR part 21.

FTA's Office of Civil Rights may request additional information from the agency to resolve questions concerning EEO compliance. Failure to submit information requested by FTA may delay the award of FTA funds or the processing of grant applications. FTA requires agencies to retain all records that would enable FTA to ascertain whether they have complied—or is complying—with Equal Employment Opportunity statutes and regulations for a minimum of three years.

FTA requires the EEO Program to contain the following seven (7) elements:

1. EEO Policy Statement
2. Dissemination of the EEO Plan
3. Designation of Personnel Responsibility
4. Assessment of Employment Practices
5. Monitoring and Reporting

*Agencies meeting the threshold requirement (100 or more transit-related employees) must also submit:*

6. Utilization Analysis
7. Goals & Timetables

MAX does not currently meet the threshold requirement of 100 or more transit-related employees, and therefore, will follow the requirements outlined in FTA Circular 4704.1A for agencies between 50-99 transit-related employees. As a smaller agency, MAX is currently not required to conduct a utilization analysis with goals and timetables or to submit the EEO Program to FTA every four years—although all other requirements remain applicable.

The EEO Program must be provided to FTA if requested by the Office of Civil Rights or for any State Management Review or Triennial Review; the format of the Utilization Analysis data sheet, though, will be used for tracking area labor availability by EEO-4 Job Category.

## EEO Policy Statement

The Macatawa Area Express Transportation Authority (MAX) 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 (40 or older), genetic information, disability, veteran status, (in Michigan, height, weight, or marital status), or other protected class.

MAX's Equal Employment Opportunity (EEO) policy applies to all employment actions—including but not limited to—recruitment or recruitment advertising, hiring, upgrading, 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. Any complaint of discrimination will be investigated thoroughly and promptly; 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.

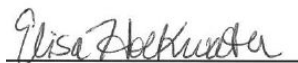
As MAX's Executive Director, I maintain overall responsibility and accountability for MAX's EEO compliance. To ensure day-to-day management—including program preparation, monitoring, and complaint investigation—I have appointed Charles Veldhoff, Data Analyst/EEO Officer, 616.928.2494, [c.veldhoff@catchamax.org](mailto:c.veldhoff@catchamax.org). For EEO concerns, Veldhoff will report directly to the MAX Authority Board and will act with full authority with all levels of management, labor unions, and employees.

MAX 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. If any employee believes that accommodation of a disability is necessary to perform essential job functions, the request for reasonable accommodation can be made to the EEO Officer. Michigan law requires MAX be given written notice within 182 days after the employee knows or reasonably should have known of the need for accommodation.

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

MAX is committed to undertaking and developing a written nondiscrimination program that sets forth the policies, practices, and procedures to which the agency is committed, and to make the EEOP 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.



Elisa Hoekwater, Executive Director

November 2, 2023

## **Dissemination of the EEO Plan**

FTA requires agencies to formally publicize and disseminate their EEO policy statement by posting it in conspicuous locations so that employees, applicants, and potential applicants are aware of the agency's commitment to EEO.

Agencies are required to disseminate their EEO policy internally and externally.

### **Internal Dissemination**

FTA requires each agency to communicate the existence of its EEO policy and program to employees, applicants, and potential applicants. MAX will accomplish this requirement through:

- Providing written communications from the Executive Director (e.g., policy statement), and routinely printing the EEO policy statement in the organizational newsletter.
- Posting official EEO materials (e.g., Federal and state labor laws poster(s)) and the agency's policy statement on bulletin boards, near time clocks, in employees' break rooms, and in the employment/personnel office.
- Including the EEO policy statement in the agency's personnel and operations manual, employee handbooks, reports, and manuals.
- Meeting with employees and affinity groups to seek input on the program implementation.
- Issuing a written memorandum annually to all supervisors informing them of their general responsibilities regarding the EEO program.
- Conducting EEO training for all new supervisors or managers within 90 days of their appointment.
- Posting the EEO statement, background information, and complaint process on the organizational website.
- Conducting periodic EEO training and program review for all employees and for managers.
- Meeting with top management officials (e.g., bus operations, human resources, planning, marketing, etc.) at least semiannually to discuss the EEOP and its implementation.
- Conducting a review of the organization's EEO policy with all employees, and a formal assessment with Management and the Authority Board at least once per year.

The EEO policy statement is included in the MAX Employee Handbook as part of the orientation materials provided to new staff. New employees are required to sign a form acknowledging they have read and understand the EEO and other core agency policies. Additionally, the EEO policy statement is reviewed and included in the new hire orientation packets, describing key aspects and components of the agency's EEO plan.

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FTA requires appropriate documentation that the EEO policy and program have been brought to the attention of employees. This includes maintaining agendas and sign-in sheets for meetings conducted when the EEO policy and its implementation are explained.

### External Dissemination

The EEO policy and program will be shared outside the organization by:

- Including in all television, newspaper, and radio advertising and recruitment outreach a statement that MAX is “*An Equal Opportunity Employer.*”
- Providing our EEO policy annually for awareness purposes and public comment, and/or job advertising for vacancies posted externally to recruitment entities (e.g., employment agencies, educational institutions, minority, civil rights, and women organizations):
  - **Disability Network Lakeshore—426 Century Lane, Holland, MI 49423**  
Amanda Rhines, Executive Director; [amanda@dnlakeshore.org](mailto:amanda@dnlakeshore.org)
  - **Michigan Women Forward—535 Cascade West Parkway SE, Grand Rapids, MI 49546**  
Judy Welch, Executive Director; [jwelch@miwf.org](mailto:jwelch@miwf.org)
  - **Lakeshore Ethnic Diversity Alliance—PO Box 2945, Holland, MI 49422-2945**  
Gloria Lara, Executive Director; [g.lara@ethnicdiversity.org](mailto:g.lara@ethnicdiversity.org)
  - **Latin Americans United for Progress—430 W. 17th St., Suite 31, Holland, MI 49423**  
Johnny Rodriguez, Program Director; [johnny@laup.org](mailto:johnny@laup.org)
  - **Ottawa County Dept. of Veterans Affairs—12251 James Street, Suite 300, Holland, MI 49423**  
[ottawacountydva@gmail.com](mailto:ottawacountydva@gmail.com)
- Attention will be given to advertising in sources and media that reach minorities and females.
- Posting the EEO statement, policy, and program information, and EEO complaint process on the organizational website.
- Displaying the phrase “*MAX is an Equal Opportunity Employer*” on the *Career Paths at MAX* page of the organizational website.

## **Designation of Personnel Responsibility**

The designation of an agency's EEO Officer responsible for EEOP management and oversight reflects the agency's EEO commitment. The EEO Officer reports directly to the Authority Board. Contact information for the EEO Officer will be publicized, and the individual's name and contact information will be included on all internal and external communications regarding the agency's EEOP.

MAX will ensure no conflicts of position or conflicts of interest occur or appear to occur with respect to the EEO Officer's role in order to maintain the integrity of the EEO investigative and decision-making process. FTA requires the functional unit that reviews EEO matters are separate and apart from the unit that represents the agency in EEO complaints. Impartiality and the appearance of impartiality are important to the credibility of the EEOP.

## **EEO Officer's EEOP Responsibilities**

FTA requires the EEO Officer's EEOP responsibilities to include, at a minimum:

- Developing the EEO policy statement and a written EEOP.
- Assisting management in collecting and analyzing employment data, identifying problem areas, setting goals and timetables (should the threshold be met), 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 further action is needed.
- Reviewing the agency's nondiscrimination plan with all managers and supervisors to ensure that the policy is understood and is followed in all personnel activities.
- 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 on each department's progress in relation to the agency's goals, and on contractor and vendor compliance.
- Serving as liaison between the agency, Federal, state, county, and local governments, regulatory agencies, minority, women, disability organizations, and other community groups.
- Maintaining awareness of current EEO laws and ensuring the laws affecting nondiscrimination are disseminated to responsible officials.
- Investigating/processing complaints of EEO discrimination.
- Monitoring complaint logs for claims of discrimination relating to EEO and/or Title VI regulations.
- Providing EEO training for employees and managers.

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- In conjunction with human resources, advising employees and applicants of any 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.
- Assisting in recruiting minority, disabled, and women applicants, and establishing outreach sources for use by hiring officials.
- Concurring in the hiring and promotion process.

MAX will provide investigative training and educational resources to all individuals involved with investigating EEO complaints and will seek to implement and utilize an Alternative Dispute Resolution (ADR) program of mediation in resolving discrimination disputes in a timely, mutually acceptable, and cost-effective manner.

### **Agency EEO Responsibilities**

Although the EEO Officer is primarily responsible for implementing an agency's EEOP, all officials, managers, and supervisors are responsible for carrying out EEO, and are not to discriminate based on protected class. All managers—from the supervisor of the smallest unit to the Board Chair or CEO/GM—bear the responsibility for ensuring that agency EEO policies and programs are carried out.

EEO responsibilities for agency officials, supervisors, and managers include:

- Participating actively in periodic audits of all aspects of employment to identify and to remove barriers obstructing the achievement of specified goals and objectives.
- Holding regular discussions with other managers, supervisors, employees, and affinity groups to ensure agency policies and procedures are being followed.
- In conjunction with the EEO Officer, maintaining and updating 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 available promotional opportunities, shadowing, mentoring).

MAX will consider establishing an advisory committee/employee resource group (ERG), or affinity group—in the practice of good faith—that reflects all segments of the community and the agency's workforce, as well as implementing diversity and inclusion strategies. The use of written suggestion boxes is currently being utilized.



## Assessment of Employment Practices

FTA requires agencies to provide narrative and statistical data that show any potential impact of employment practices on minorities and women. This includes:

- The number of applicants for employment in each job category and the number hired, cross-referenced by sex and race.
- The number of employees in each job category who applied for promotion or transfer and the number in each job category promoted or transferred, cross-referenced by sex and race.
- The number and types of disciplinary actions (e.g., indefinite suspension, loss of pay, demotion), tailored to the language used in union contracts and agency policies and procedures.
- The number of voluntary separations/involuntary terminations, cross-referenced by sex and race.
- Job category training that fosters promotion potential, cross-referenced by sex and race.

The EEO policy applies to MAX's recruitment and hiring efforts and reflects our commitment to recruit and promote the most qualified persons available. All employment practices and procedures shall be conducted in compliance with existing federal and state equal opportunity laws.

MAX will utilize the "4/5ths" or "80%" rule to identify potential adverse impacts as provided by FTA via download from its website in the form of Microsoft Excel workbooks. FTA requires agencies to complete the spreadsheets by providing current, accurate, and relevant data accompanied by a narrative explaining the source of the data and the results of the analysis—raw data is not acceptable.

The following sample provided by the *U.S. Equal Employment Opportunity Commission* illustrates the "4/5ths" or "80%" rule:

*If an organization's hiring rate for Whites is 60%, Native Americans 45%, Hispanics 48%, and Blacks 51%, and each of these groups constitutes more than 2% of the labor force in the relevant labor area, a comparison should be made of the selection rate for each group with that of the highest group (Whites). These comparisons show the following impact ratios: Native Americans 45/60 or 75%, Hispanics 48/60 or 80%, and Blacks 51/60 or 85%. Applying the 4/5ths or 80% rule of thumb—on the basis of the above information alone—adverse impact is indicated for Native Americans but not for Blacks or Hispanics.*

FTA notes that determining disparate impact is not a purely arithmetic exercise since other factors (such as the overall numbers involved) contribute to a proper analysis of employment practices. In addition, FTA does not require analysis for any groups constituting less than 2 percent of the applicable workforce, the basis for which is determined by the *Area Labor Percent Availability by EEO-4 Job Group* chart found on the last page of this program report.

## Employment Practices

### 1. Recruitment & Selection

Everyone at MAX who recruits, interviews, hires, promotes, trains, or takes disciplinary actions will be trained in the use of objective, job-related standards. Job descriptions and hiring standards reflect major job functions and do not require qualifications that are higher than needed.

Individuals and community-based organizations shall be used for the purposes of soliciting minority and female applicants. Special emphasis shall be placed on the dissemination of information to female and minority groups in the community.

### 2. Testing:

MAX does not currently utilize any written, formal, or scored tests in the employment selection process. Should such testing be used, it shall be identified in this section along with a description of test administration procedures. An explanation related to test validation to predict or measure job performance will also be included.

Other items related to testing include:

- Background check, driver license/driving record verifications are required prior to any employment offer.
- Medical evaluation including drug screen is required for safety-sensitive positions requiring a CDL.

### 3. Advertisements

Advertisements for open positions shall be conducted at all times by:

- Internally: In general, open positions will be made available through notices to all departments to offer employees the opportunity to apply for positions they may be qualified to perform. The Authority does reserve the right not to post a particular job opening.
  - A copy of MAX's Internal Job Posting form is provided on Page 28.
- Externally: open positions not filled from available MAX employees shall be advertised.

### 4. Seniority Practices

- MAX does not have seniority practices or provisions in place. Open positions are posted for all employees to see and to apply, however, the Authority reserves the right not to post a particular opening. Any interested candidate who applies for a position is interviewed and provided the same opportunity to prove their capabilities of being the best candidate for the open position.

### 5. Training

Formal trainings are held routinely for all staff (depending on job classification) during quarterly safety meetings. Additionally, refresher trainings are offered to staff to sharpen skills in areas of need to help

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avert potential infractions. More informal training also exists for temporary “fill-in” positions, which often later allow for promotional opportunities through such cross-training tactics. MAX ensures protected classes are given equal opportunity to participate in such cross-trainings, with potential candidates identified as a key part of the annual EEO review with the management staff.

MAX records both supervisory and non-supervisory staff trainings and course objectives and verifies staff participation through attendance lists.

The employee training and promotion potential of minority and female employees is periodically reviewed, with eligible employees encouraged to apply when openings are available.

### 6. Selection Standards & Procedures

- Selection—in selecting potential employees it shall be the policy to avoid, and eliminate where needed, standards or procedures which tend to screen out minority and female applicants. Selection processes are specifically concerned with preventing selections based on derogatory stereotypical characterizations of individuals based on religion, race, color, national origin, age, sex, height, weight, marital status, sexual orientation, or disability.
  - Additional mechanisms such as probationary periods may be used to further examine the suitability of the employee. Probationary periods are clearly defined in employment offer letters, labor contracts, and are applied equally to all employees assigned to positions requiring them.
  - Individuals with disabilities are hired and promoted on merit factors alone and not by arbitrary generalizations, stereotypes, or preconceived notions about “handicapped” or temporarily disabled individuals.
- Use of EEOC Guidelines—it shall be the policy of MAX to subscribe and comply with the Equal Employment Opportunity Commission’s (EEOC) guidelines on employee selection. If testing takes place, tests shall be job related and consistent with the EEOC guidelines on employee selection.
- Application Forms—application forms and pre-employment inquiries shall be conducted in a manner that is neutral and non-discriminatory. Traditional discriminatory barriers—except for bona fide requirements—shall be avoided and corrected when found. MAX provides electronic applications as well as traditional paper application forms.
- Interviews—interviews shall be conducted in an objective manner. It shall be the policy of the Authority that the interviewer be qualified and sensitive to the goals and objectives of the Equal Employment Opportunity Policy and Plan.
- Monitoring Process—all steps in the selection process shall be evaluated and monitored by the EEO Officer.

7. Promotions & Transfers

It shall be the responsibility of the EEO Officer and supervisors to ensure minorities and females are given equal opportunity for new jobs, promotions, transfers, and training.

- Removal of Employment Barriers—it shall be the EEO Officer’s responsibility to work with the MAX Director and supervisors in the identification and removal of any employment barriers which might impede horizontal and vertical movement of minorities and females.
- Record Keeping—to monitor and ensure that progressive employment practices take place, the EEO Officer shall maintain records to monitor upward mobility.

Good practices under consideration or currently utilized include:

- Training to employees, personnel, and management staff on proper interview techniques.
- Counseling to assist employees in identifying promotional opportunities.
- Training and educational programs to increase promotion and transfer opportunities.
- Leadership mentoring, shadowing, or training for identified talent.

8. Compensation & Benefits

Wages, salary levels, and other forms of compensation shall be consistent with the Equal Pay Act of 1963, as amended, and administered in a non-discriminatory manner. The Equal Pay Act means equal pay for equal work. MAX will review its compensation and benefit structure on a regular basis to ensure protected classes do not fall risk to discrimination. Compensation information is additionally described in the MAX Employee Handbook.

Reviews will also be made to compare job descriptions with actual job functions of positions held by employees of protected classes, comparing length of service and pay rates. All additional benefits, such as retirement plans and medical benefits, will also be reviewed to ensure they are being equally available to all employees.

9. Disciplinary Procedures & Termination Process

Employees of MAX are required to always conduct themselves in a manner that reflects a positive image for the Authority. Staff are expected to perform their duties safely with honesty and integrity. Disciplinary actions (e.g., termination, demotion, discipline, or layoff) will be administered consistently and equitably.

The objective is correcting an employee’s deficiencies. The level of discipline is based on the totality of the circumstances surrounding the issue. Depending on the nature of the infraction or performance deficiency as determined by investigation, the following progressive action may be taken:

- Counseling Action/Verbal Warning
- Written Warning

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- Suspension Without Pay/Final Written Warning
- Termination

Layoff guidelines or other clauses in union contracts will be monitored for disparate effects on employees within protected classes. Should any barriers to equal employment be identified, MAX will work to revise any future union agreements within this area.

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## Area Labor Comparison

Below are area and employee labor breakdowns—by race and sex—from the past two fiscal years:

**Macatawa Area Express Transportation Authority  
Equal Employment Opportunity (EEO) Program - Area Labor Comparison: October 1, 2022**

Population/Workforce	State of Michigan	County of Ottawa	County of Allegan	Area Total	MAX Employees
	5,005,494	162,714	58,763	221,477	69
Male	2,620,376	87,719	32,038	119,757	44
Female	2,385,118	74,995	26,725	101,720	25
% Male	52.4%	53.9%	54.5%	54.1%	63.8%
% Female	47.7%	46.1%	45.5%	45.9%	36.2%
White	3,785,053	131,422	51,025	182,447	52
Afr. American	626,067	2,375	587	2,962	1
Hispanic	245,436	14,778	3,855	18,633	13
Asian	109,774	4,784	409	5,193	1
Native American	22,718	561	224	785	0
Pacific/Hi Island	1,690	11	0	11	0
2 or More Races	154,417	5,170	1,868	7,038	2
Some Other Race Alone	60,339	3,613	795	4,408	0
Total Minority	1,220,441	31,292	7,738	39,030	17
% White	75.6%	80.8%	86.8%	82.4%	75.4%
% Afr. American	12.5%	1.5%	1.0%	1.3%	1.4%
% Hispanic	4.9%	9.1%	6.6%	8.4%	18.8%
% Asian	2.2%	2.9%	0.7%	2.3%	1.4%
% Native American	0.5%	0.3%	0.4%	0.4%	0.0%
% Pacific/Hi Island	0.0%	0.0%	0.0%	0.0%	0.0%
% 2 or More Races	3.1%	3.2%	3.2%	3.2%	2.9%
Some Other Race Alone	2.3%	4.1%	2.5%	3.7%	0.0%
% Minority	24.4%	19.2%	13.2%	17.6%	24.6%

Source: 2020 ACS 5-Year Estimates; Employment Status - S2301, Selected Economic Characteristics - DP03; data.census.gov

**Macatawa Area Express Transportation Authority  
Equal Employment Opportunity (EEO) Program - Area Labor Comparison: October 1, 2023**

Population/Workforce	State of Michigan	County of Ottawa	County of Allegan	Area Total	MAX Employees
	5,139,946	174,263	60,378	234,641	70
Male	2,703,612	93,753	32,966	126,720	42
Female	2,436,334	80,510	27,412	107,921	28
% Male	52.6%	53.8%	54.6%	54.0%	60.0%
% Female	47.4%	46.2%	45.4%	46.0%	40.0%
White	3,794,702	140,142	51,623	191,765	56
Afr. American	628,709	2,580	651	3,231	0
Hispanic	256,176	15,278	4,129	19,407	12
Asian	174,609	5,041	427	5,468	0
Native American	21,610	623	216	839	0
Pacific/Hi Island	1,535	43	0	43	0
2 or More Races	195,737	6,063	2,447	8,510	2
Some Other Race Alone	66,868	4,493	885	5,378	0
Total Minority	1,345,244	34,121	8,755	42,876	14
% White	73.8%	80.4%	85.5%	81.7%	80.0%
% Afr. American	12.2%	1.5%	1.1%	1.4%	0.0%
% Hispanic	5.0%	8.8%	6.8%	8.3%	17.1%
% Asian	3.4%	2.9%	0.7%	2.3%	0.0%
% Native American	0.4%	0.4%	0.4%	0.4%	0.0%
% Pacific/Hi Island	0.0%	0.0%	0.0%	0.0%	0.0%
% 2 or More Races	3.8%	3.5%	4.1%	3.6%	2.9%
Some Other Race Alone	2.5%	4.8%	2.7%	4.2%	0.0%
% Minority	26.2%	19.6%	14.5%	18.3%	20.0%

Source: 2021 ACS 5-Year Estimates; Employment Status - S2301, Selected Economic Characteristics - DP03; data.census.gov

**NARRATIVE: RACE**—From FY2022 to FY2023, the number of minority staff decreased from 17 to 14; the proportion of minority staff decreased from 24.6% to 20.0%; minority representation remained above the average minority area labor representation rate of 18.0%. **WOMEN**—Over the same period, the overall number of female staff increased from 25 to 28; the proportion of *Women* increased from 36.2% to 40.0%, below the overall average female area labor representation of 46.0%.

**DATA SOURCE:** MS Excel Sheet *EEOemploymentpracticesFY2022/23*; data.census.gov

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## Hires

Below are application and hiring breakdowns—by race and sex—for the past two fiscal years:

Macatawa Area Express Transportation Authority  
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Job Category (Use EEO-4)	Total		W		AI/AN		B		H/L		A		NHOP		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
<b>1 - Officials &amp; Administrators</b>																
Number Applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Hires	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>2 - Professionals</b>																
Number Applied	2	7	2	5	-	-	-	-	-	2	-	-	-	-	-	-
Total Hires	1	2	1	2	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	50.0%	28.6%	50.0%	40.0%	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	57.1%	100.0%	80.0%	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	Yes	No	No	N/A	N/A	N/A	N/A	N/A	Yes	N/A	N/A	N/A	N/A	N/A	N/A
<b>5 - Administrative Support</b>																
Number Applied	6	14	2	7	-	-	-	1	2	5	1	-	-	-	1	1
Total Hires	1	4	-	2	-	-	-	-	2	1	-	-	-	-	-	-
Selection Rate	16.7%	28.6%	0.0%	28.6%	N/A	N/A	N/A	0.0%	0.0%	40.0%	100.0%	N/A	N/A	N/A	0.0%	0.0%
Ratio to Highest Rate	58.3%	100.0%	0.0%	28.6%	N/A	N/A	N/A	0.0%	0.0%	40.0%	100.0%	N/A	N/A	N/A	0.0%	0.0%
Potential Adverse Impact (Yes/No)	Yes	No	Yes	Yes	N/A	N/A	N/A	Yes	Yes	Yes	No	N/A	N/A	N/A	Yes	Yes
<b>8 - Services &amp; Maint. Workers</b>																
Number Applied	57	19	32	8	-	-	6	3	12	3	1	4	-	-	6	1
Total Hires	15	8	11	4	-	-	-	2	3	1	-	1	-	-	1	-
Selection Rate	26.3%	42.1%	34.4%	50.0%	N/A	N/A	0.0%	66.7%	25.0%	33.3%	N/A	25.0%	N/A	N/A	16.7%	N/A
Ratio to Highest Rate	62.5%	100.0%	51.6%	75.0%	N/A	N/A	0.0%	100.0%	37.5%	50.0%	N/A	37.5%	N/A	N/A	25.0%	N/A
Potential Adverse Impact (Yes/No)	Yes	No	Yes	Yes	N/A	N/A	Yes	No	Yes	Yes	N/A	Yes	N/A	N/A	Yes	N/A

Notes: Only EEO-4 categories in which MAX employs staff are shown.

Persons with Disabilities	Total		W		AI/AN		B		H/L		A		NHOP		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
Number Applied	-	1	-	1	-	-	-	-	-	-	-	-	-	-	-	-
Total Hires	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	N/A	0.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>Veterans</b>																
Number Applied	10	1	8	1	-	-	-	-	1	-	1	-	-	-	-	-
Total Hires	3	1	2	1	-	-	-	-	1	-	-	-	-	-	-	-
Selection Rate	30.0%	100.0%	25.0%	100.0%	N/A	N/A	N/A	N/A	100.0%	N/A	0.0%	N/A	N/A	N/A	N/A	N/A

Notes:

**NARRATIVE: RACE**—Across job categories, the *Whites* hiring rate was 35.7% and 22.5% for minorities, including 25.0% for *Hispanics*. For *Service & Maintenance*, the hiring rate for *Whites* was 37.5%, for *Hispanics* 26.7%, for *Asians* 20.0%, and for *Two or More Races* 14.3%. Following the 4/5 or 80% rule, a potential adverse impact is indicated among *Hispanics*, *Asians*, and *Two or More Races* within this job category, and will be reviewed with staff and monitored in FY2024. For *Administrative Support*, the hiring rate for *Asians* was 100.0%, and for *Whites* 22.2%, for *Hispanics* at 28.6%. Following the 4/5 or 80% rule, no potential adverse impact is indicated within the *Administrative Support* job category. *Blacks* represent < 2% of the local labor force, so no comparison is required. **WOMEN**—Across job categories, the hiring rate for *Women* was 35.0% versus 26.2% for *Men*. For *Administrative Support* the hiring rate for *Women* was 28.6%, compared with *Men* at 16.7%; *Women* staff members remain well represented at 90.9% within the *Administrative Support* job category. For *Service & Maintenance*, the hiring rate for *Women* was 42.1%, above that for *Men* at 26.3%; no adverse impact on *Women* has been determined.

**DATA SOURCE:** MS Excel Sheet *EEOemploymentpracticesFY2022/23*

# Equal Employment Opportunity Program (EEO) FY2024

## Promotions/Transfers

Below are application and promotion breakdowns—by race and sex—for the past two fiscal years:

**Macatawa Area Express Transportation Authority**  
**Equal Employment Opportunity (EEO) Program - FY2022-2023**

Job Category (Use EEO-4)	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
<b>1 - Officials &amp; Administrators</b>																
Number Applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Promotions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>2 - Professionals</b>																
Number Applied	6	1	6	1	-	-	-	-	-	-	-	-	-	-	-	-
Total Promotions	2	-	2	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	33.3%	0.0%	33.3%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	NA	100.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	Yes	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>5 - Administrative Support</b>																
Number Applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Promotions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>8 - Service &amp; Maint. Workers</b>																
Number Applied	2	1	1	-	-	-	-	-	1	1	-	-	-	-	-	-
Total Promotions	1	-	-	-	-	-	-	-	1	-	-	-	-	-	-	-
Selection Rate	50.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	N/A	100.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	NA	0.0%	N/A	N/A	N/A	N/A	N/A	100.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	Yes	N/A	N/A	N/A	N/A	N/A	No	Yes	N/A	N/A	N/A	N/A	N/A	N/A

Notes: Only EEO-4 categories in which MAX employs staff are shown.

Job Category (Use EEO-4)	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
<b>Persons with Disabilities</b>																
Number Applied	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Promotions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>Veterans</b>																
Number Applied	2	-	2	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Promotions	2	-	2	-	-	-	-	-	-	-	-	-	-	-	-	-
Selection Rate	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Notes:

**NARRATIVE: RACE**—Although the low numbers make analysis difficult, *Minorities* made up 22.3% of MAX’s average minority workforce during FYs2022-2023 and accounted for 33.3% of those receiving a promotion or transfer. *Minorities* made up 20.0% of applications for promotion or transfer, nearly equal to minority staff representation; no potential adverse impact has been identified. **WOMEN**—Although the low numbers involved make a proper analysis more difficult, *Women* comprised 38.1% of the MAX average female workforce for FYs2022-2023 but made up 0.0% of those *receiving* a promotion or transfer—below what would be considered the expected rate. Among *applications* for promotion or transfer, 20.0% were made by *Women*, also below the expected rate. While no adverse impact is believed to be occurring—*Women* make up 100.0% of *Officials/Administrators*, 57.1% of *Professionals*, and 90.9% of *Administrative Support*—this area will be reviewed with staff and monitored into FY2024, along with continuing efforts toward increasing the numbers of *Women* applying for internal promotional or transfer opportunities.

**DATA SOURCE:** MS Excel Sheet *EEOemploymentpracticesFY2022/23*



# Equal Employment Opportunity Program (EEO) FY2024

## Disciplinary

Below are disciplinary measures—by race and sex—for the past two fiscal years:

Macatawa Area Express Transportation Authority  
Equal Employment Opportunity (EEO) Program - Disciplinary Actions FY2022-2023

DISCIPLINARY ACTIONS*		TOTAL				RACE													
						Non-Minority				Minority									
		Number	Male	Female	Minority	White		African Am.		Hispanic		Asian		Native Am.		Pacific Islander		2 or More Races	
1. Officials & Administrators	Verbal Warning	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
			0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
	Written Warning	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
			0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
	Suspension Without Pay	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Termination	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
2. Professionals	Verbal Warning	1	1	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	
			100.0%	0.0%	0.0%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
	Written Warning	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
			0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
	Suspension Without Pay	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
Termination	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
5. Administrative Support	Verbal Warning	2	0	2	1	0	1	0	0	0	1	0	0	0	0	0	0	0	
			0.0%	100.0%	50.0%	0.0%	50.0%	0.0%	0.0%	0.0%	50.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
	Written Warning	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
			0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
	Suspension Without Pay	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
Termination	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
		0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
8. Service & Maint. Workers	Verbal Warning	26	19	7	9	11	6	0	0	7	0	0	0	0	0	0	1	1	
			73.1%	26.9%	34.6%	42.3%	23.1%	0.0%	0.0%	26.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	3.8%	3.8%	
	Written Warning	14	5	9	3	5	6	0	1	0	1	0	0	0	0	0	0	0	
			35.7%	64.3%	21.4%	35.7%	42.9%	0.0%	7.1%	0.0%	7.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	7.1%	
	Suspension Without Pay	8	3	5	2	3	3	0	1	0	1	0	0	0	0	0	0	0	
		37.5%	62.5%	25.0%	37.5%	37.5%	0.0%	12.5%	0.0%	12.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
Termination	7	4	3	3	3	1	0	0	1	2	0	0	0	0	0	0	0		
		57.1%	42.9%	42.9%	42.9%	14.3%	0.0%	0.0%	14.3%	28.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%		
<b>TOTAL</b>		<b>58</b>	<b>32</b>	<b>26</b>	<b>18</b>	<b>23</b>	<b>17</b>	<b>0</b>	<b>2</b>	<b>8</b>	<b>5</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>2</b>	
			<b>55.2%</b>	<b>44.8%</b>	<b>31.0%</b>	<b>39.7%</b>	<b>29.3%</b>	<b>0.0%</b>	<b>3.4%</b>	<b>13.8%</b>	<b>8.6%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>1.7%</b>	<b>3.4%</b>	

\*These measures may be applied in the order described, or different levels of the procedure may be used as required and outlined in the Progressive Discipline Policy.

**NARRATIVE:** *Service & Maintenance Workers*—composing the majority of MAX’s workforce—will be the primary focus area in this review. **RACE**—For FYs2022-2023, minority groups across all job categories with disciplinary actions attributed was *Black* at 3.4% (*Blacks* are 0.7% of the avg. MAX workforce), *Hispanic* at 22.4% (*Hispanics* are 18.0% of the avg. MAX workforce), and *White* at 69.0% (*Whites* are 77.7% of the avg. MAX workforce). Among *Service & Maintenance Workers*, disciplinary actions for *Minorities* increased from 24.3% in FYs2021-2022 to 30.9% in FYs2022-2023, whereby *Minorities* within this job category made up 21.7% of the average MAX workforce. Further review shows *Minorities* receiving higher-than-expected rates of *Verbal Warning* (at 34.6%), and *Termination* (at 42.9%). Comparing FY2022 versus FY2023—specifically—the rates at which *Minorities* received disciplinary actions within this job category increased from 25.0% to 36.7%. Although the actions taken were purposeful and primarily involved unsafe driving, preventable accidents, insubordination, and attendance points, data still suggest a potential adverse impact affecting *Minorities* could be indicated in the areas of *Verbal Warning* and *Termination*; this area will be reviewed with staff and monitored into FY2024. **WOMEN**—Analysis shows *Men* made up 55.2% of overall disciplinary actions while representing 61.9% of the average FY2022-FY2023 MAX workforce; *Women* made up 44.8% of overall disciplinary actions, versus representing 38.1% of the average MAX workforce. Among *Service & Maintenance Workers*—specifically—*Women* are shown receiving higher-than-expected rates of *Written Warning* (at 64.3%) and *Suspension Without Pay* (at 62.5%); although two (2) female staff accounted for 30.8% of measures attributed to *Women*—and the actions taken purposeful and primarily involved unauthorized breaks, public conduct, preventable accidents, and attendance points, data still suggest a potential adverse impact affecting *Women* could be indicated in the areas of *Written Warning* and *Suspension Without Pay*; this area will be reviewed with staff and monitored into FY2024.

**DATA SOURCE:** MS Excel Sheet *EEOemploymentpracticesFY2022/23*

# Equal Employment Opportunity Program (EEO) FY2024

## Involuntary Terminations

Below are employee involuntary terminations—by race and sex—for each of the past two fiscal years:

Macatawa Area Express Transportation Authority  
Equal Employment Opportunity (EEO) Program - FY2022

Job Category (Use EEO-4)	Total		W		A/IAN		B		H/L		A		NH/PI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
<b>1 - Officials &amp; Administrators</b>																
Total Workforce	1	3	1	2	-	-	-	-	-	-	1	-	-	-	-	-
Total Involuntary Terminations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Number Retained	1	3	1	2	-	-	-	-	-	-	1	-	-	-	-	-
Retention Rate	100.0%	100.0%	100.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	100.0%	100.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	N/A	N/A	N/A	N/A	No	N/A	N/A	N/A	N/A	N/A
<b>2 - Professionals</b>																
Total Workforce	3	1	3	1	-	-	-	-	-	-	-	-	-	-	-	-
Total Involuntary Terminations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Number Retained	3	1	3	1	-	-	-	-	-	-	-	-	-	-	-	-
Retention Rate	100.0%	100.0%	100.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	100.0%	100.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>5 - Administrative Support</b>																
Total Workforce	5	10	2	7	-	-	-	-	3	3	-	-	-	-	-	-
Total Involuntary Terminations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Number Retained	5	10	2	7	-	-	-	-	3	3	-	-	-	-	-	-
Retention Rate	100.0%	100.0%	100.0%	100.0%	N/A	N/A	N/A	N/A	100.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	100.0%	100.0%	100.0%	N/A	N/A	N/A	N/A	100.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	N/A	N/A	No	No	N/A	N/A	N/A	N/A	N/A	N/A
<b>8 - Service &amp; Maint. Workers</b>																
Total Workforce	32	16	27	11	-	-	1	-	1	4	3	-	-	-	-	1
Total Involuntary Terminations	3	1	2	-	-	-	-	-	1	1	-	-	-	-	-	-
Number Retained	29	15	25	11	-	-	1	-	3	3	-	-	-	-	-	1
Retention Rate	90.6%	93.8%	92.6%	100.0%	N/A	N/A	100.0%	N/A	75.0%	100.0%	N/A	N/A	N/A	N/A	N/A	100.0%
Ratio to Highest Rate	96.7%	100.0%	92.6%	100.0%	N/A	N/A	100.0%	N/A	75.0%	100.0%	N/A	N/A	N/A	N/A	N/A	100.0%
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	N/A	N/A	#VALUE	Yes	No	N/A	N/A	N/A	N/A	No

Notes: Only EEO-4 categories in which MAX employs staff are shown.

Macatawa Area Express Transportation Authority  
Equal Employment Opportunity (EEO) Program - FY2023

Job Category (Use EEO-4)	Total		W		A/IAN		B		H/L		A		NH/PI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
<b>1 - Officials &amp; Administrators</b>																
Total Workforce	2	3	2	2	-	-	-	-	-	-	1	-	-	-	-	-
Total Involuntary Terminations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Number Retained	2	3	2	2	-	-	-	-	-	-	1	-	-	-	-	-
Retention Rate	100.0%	100.0%	100.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	100.0%	100.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	N/A	N/A	N/A	N/A	No	N/A	N/A	N/A	N/A	N/A
<b>2 - Professionals</b>																
Total Workforce	2	3	2	3	-	-	-	-	-	-	-	-	-	-	-	-
Total Involuntary Terminations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Number Retained	2	3	2	3	-	-	-	-	-	-	-	-	-	-	-	-
Retention Rate	100.0%	100.0%	100.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	100.0%	100.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>5 - Administrative Support</b>																
Total Workforce	1	8	-	5	-	-	-	-	-	-	3	1	-	-	-	-
Total Involuntary Terminations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Number Retained	1	8	-	5	-	-	-	-	-	-	3	1	-	-	-	-
Retention Rate	100.0%	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	100.0%	100.0%	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	100.0%	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	100.0%	100.0%	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A	No	No	N/A	N/A	N/A	N/A
<b>8 - Service &amp; Maint. Workers</b>																
Total Workforce	38	11	29	8	-	-	1	-	7	2	-	-	-	-	-	1
Total Involuntary Terminations	4	3	3	1	-	-	-	-	1	2	-	-	-	-	-	-
Number Retained	34	8	26	7	-	-	1	-	6	-	-	-	-	-	-	1
Retention Rate	89.5%	72.7%	89.7%	87.5%	N/A	N/A	100.0%	N/A	85.7%	N/A	N/A	N/A	N/A	N/A	N/A	100.0%
Ratio to Highest Rate	100.0%	81.3%	89.7%	87.5%	N/A	N/A	100.0%	N/A	85.7%	N/A	N/A	N/A	N/A	N/A	N/A	100.0%
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	N/A	No	#VALUE	N/A	N/A	N/A	N/A	N/A	No

Notes: Only EEO-4 categories in which MAX employs staff are shown.

**NARRATIVE: RACE**—Among *Officials & Administrators*, *Professionals*, and *Administrative Support* in FY2023, no Involuntary Terminations occurred. Over the past two (2) years, the *Service & Maintenance Workers* job category recorded retention rates with respect to Involuntary Terminations with *Whites* 92.0%, *Hispanics* 75.0%, and *2-or-More-Races* 100.0%; applying the 4/5 or 80% rule, a potential adverse impact for *Hispanics* is identified. Though no adverse impact is believed to be occurring (the Involuntary Terminations resulted from progressive insubordination and attendance policy violations) this rate will be reviewed with staff and monitored into FY2024. *Blacks* make up < 2% of the local labor force, so no comparison is required; *Asians* could not be measured due to low counts involved. **WOMEN**—With the low numbers involved making analysis more difficult, *Women* represented 36.7% of Involuntary Terminations (4-out-of-11) during FYs2022-2023, while representing 38.1% of the workforce across those same two years; no potential adverse impacts are identified.

**DATA SOURCE:** MS Excel Sheet *EEOemploymentpracticesFY2022/23*

# Equal Employment Opportunity Program (EEO) FY2024

## Voluntary Separations

Below are employee voluntary separations—by race and sex—for each of the past two fiscal years:

Macatawa Area Express Transportation Authority  
Equal Employment Opportunity (EEO) Program - FY2022

Job Category (Use EEO-4)	Total		W		A/IAN		B		H/L		A		NH/PI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
<b>1 - Officials &amp; Administrators</b>																
Total Workforce	1	3	1	2	-	-	-	-	-	-	1	-	-	-	-	-
Total Voluntary Separations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Number Retained	1	3	1	2	-	-	-	-	-	-	1	-	-	-	-	-
Retention Rate	100.0%	100.0%	100.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	100.0%	100.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	N/A	N/A	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A
<b>2 - Professionals</b>																
Total Workforce	3	1	3	1	-	-	-	-	-	-	-	-	-	-	-	-
Total Voluntary Separations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Number Retained	3	1	3	1	-	-	-	-	-	-	-	-	-	-	-	-
Retention Rate	100.0%	100.0%	100.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	100.0%	100.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>5 - Administrative Support</b>																
Total Workforce	5	10	2	7	-	-	-	-	3	3	-	-	-	-	-	-
Total Voluntary Separations	1	1	1	1	-	-	-	-	-	-	-	-	-	-	-	-
Number Retained	4	9	1	6	-	-	-	-	3	3	-	-	-	-	-	-
Retention Rate	80.0%	90.0%	50.0%	85.7%	N/A	N/A	N/A	N/A	100.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	88.9%	100.0%	50.0%	85.7%	N/A	N/A	N/A	N/A	100.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	Yes	No	N/A	N/A	N/A	N/A	No	No	N/A	N/A	N/A	N/A	N/A	N/A
<b>8 - Service &amp; Maint. Workers</b>																
Total Workforce	32	16	27	11	-	-	1	1	4	3	-	-	-	-	-	1
Total Voluntary Separations	5	1	5	-	-	-	-	-	-	1	-	-	-	-	-	-
Number Retained	27	15	22	11	-	-	1	1	4	2	-	-	-	-	-	1
Retention Rate	84.4%	93.8%	81.5%	100.0%	N/A	N/A	100.0%	100.0%	100.0%	66.7%	N/A	N/A	N/A	N/A	N/A	100.0%
Ratio to Highest Rate	90.0%	100.0%	81.5%	100.0%	N/A	N/A	100.0%	100.0%	100.0%	66.7%	N/A	N/A	N/A	N/A	N/A	100.0%
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	No	No	No	Yes	N/A	N/A	N/A	N/A	N/A	No

Notes: Only EEO-4 categories in which MAX employs staff are shown.

Macatawa Area Express Transportation Authority  
Equal Employment Opportunity (EEO) Program - FY2023

Job Category (Use EEO-4)	Total		W		A/IAN		B		H/L		A		NH/PI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
<b>1 - Officials &amp; Administrators</b>																
Total Workforce	2	3	2	2	-	-	-	-	-	1	-	-	-	-	-	-
Total Voluntary Separations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Number Retained	2	3	2	2	-	-	-	-	-	1	-	-	-	-	-	-
Retention Rate	100.0%	100.0%	100.0%	100.0%	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	100.0%	100.0%	100.0%	N/A	N/A	N/A	N/A	N/A	100.0%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	N/A	N/A	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A
<b>2 - Professionals</b>																
Total Workforce	2	3	2	3	-	-	-	-	-	-	-	-	-	-	-	-
Total Voluntary Separations	2	-	2	-	-	-	-	-	-	-	-	-	-	-	-	-
Number Retained	-	3	-	3	-	-	-	-	-	-	-	-	-	-	-	-
Retention Rate	N/A	100.0%	N/A	#DIV/0!	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	#VALLE!	100.0%	#VALLE!	#DIV/0!	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	#VALLE!	No	#VALLE!	#DIV/0!	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>5 - Administrative Support</b>																
Total Workforce	1	8	-	5	-	-	-	-	-	3	1	-	-	-	-	-
Total Voluntary Separations	1	-	-	-	-	-	-	-	-	-	1	-	-	-	-	-
Number Retained	-	8	-	5	-	-	-	-	-	3	-	-	-	-	-	-
Retention Rate	N/A	100.0%	N/A	#DIV/0!	N/A	N/A	N/A	N/A	N/A	#DIV/0!	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	#VALLE!	100.0%	N/A	#DIV/0!	N/A	N/A	N/A	N/A	N/A	#DIV/0!	#VALLE!	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	#VALLE!	No	N/A	#DIV/0!	N/A	N/A	N/A	N/A	N/A	#DIV/0!	#VALLE!	N/A	N/A	N/A	N/A	N/A
<b>8 - Service &amp; Maint. Workers</b>																
Total Workforce	38	11	29	8	-	-	1	-	7	2	-	-	-	-	1	1
Total Voluntary Separations	13	3	11	2	-	-	1	-	1	1	-	-	-	-	-	-
Number Retained	25	8	18	6	-	-	-	-	6	1	-	-	-	-	1	1
Retention Rate	65.8%	72.7%	62.1%	75.0%	N/A	N/A	N/A	N/A	85.7%	50.0%	N/A	N/A	N/A	N/A	100.0%	100.0%
Ratio to Highest Rate	90.5%	100.0%	62.1%	75.0%	N/A	N/A	#VALLE!	N/A	85.7%	50.0%	N/A	N/A	N/A	N/A	100.0%	100.0%
Potential Adverse Impact (Yes/No)	No	No	Yes	Yes	N/A	N/A	#VALLE!	N/A	No	Yes	N/A	N/A	N/A	N/A	No	No

Notes: Only EEO-4 categories in which MAX employs staff are shown.

**NARRATIVE: RACE**—Among *Officials & Administrators* in FY2023, no voluntary separations occurred. The overall retention rate for *Hispanics* decreased from 92.9% in FY2022 to 84.6% in FY2023. Over the past two (2) years, the *Service & Maintenance Workers* job category recorded retention rates with respect to Voluntary Separations with *Whites* 77.3%, *Hispanics* 81.3%, and *2-or-More-Races* 100.0%; no potential adverse impact is identified. *Blacks* make up < 2% of the local labor force, so no comparison is required; *Asians* could not be measured due to low counts involved. **WOMEN**—The past (2) years saw the female retention rate among all job categories at 90.9% versus 73.8% for males. Among *Service & Maint. Workers*, the female retention rate decreased from 93.8% in FY2022 to 72.7% for FY2023 (versus the male retention rate of 65.8% in FY2023); no potential adverse impact is identified.

**DATA SOURCE:** MS Excel Sheet *EEOemploymentpracticesFY2022/23*

# Equal Employment Opportunity Program (EEO) FY2024

## Trainings

Below are job category trainings (w/promotion potential) by race and sex, for each of the past two fiscal years.

Macatawa Area Express Transportation Authority  
Equal Employment Opportunity (EEO) Program - FY2022

Job Category (Use EEO-4)	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
<b>1 - Officials &amp; Administrators</b>																
Total Workforce	1	3	1	2	-	-	-	-	-	-	1	-	-	-	-	-
Total Trained	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Training Rate	0.0%	0.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	NA	NA	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	N/A	N/A	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A
<b>2 - Professionals</b>																
Total Workforce	3	1	3	1	-	-	-	-	-	-	-	-	-	-	-	-
Total Trained	1	-	1	-	-	-	-	-	-	-	-	-	-	-	-	-
Training Rate	33.3%	0.0%	33.3%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	100.0%	NA	100.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	Yes	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>5 - Administrative Support</b>																
Total Workforce	5	10	2	7	-	-	-	-	3	3	-	-	-	-	-	-
Total Trained	-	1	-	-	-	-	-	-	-	1	-	-	-	-	-	-
Training Rate	0.0%	10.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	0.0%	33.3%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	NA	100.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	0.0%	100.0%	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	Yes	Yes	N/A	N/A	N/A	N/A	Yes	No	N/A	N/A	N/A	N/A	N/A	N/A
<b>8 - Service &amp; Maint. Workers</b>																
Total Workforce	32	16	27	11	-	-	1	1	4	3	-	-	-	-	-	1
Total Trained	2	-	2	-	-	-	-	-	-	-	-	-	-	-	-	-
Training Rate	6.3%	0.0%	7.4%	0.0%	N/A	N/A	0.0%	0.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	N/A	0.0%
Ratio to Highest Rate	100.0%	NA	100.0%	0.0%	N/A	N/A	0.0%	0.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	N/A	0.0%
Potential Adverse Impact (Yes/No)	No	No	No	Yes	N/A	N/A	Yes	Yes	Yes	Yes	N/A	N/A	N/A	N/A	N/A	Yes

Notes: Only EEO-4 categories in which MAX employs staff are shown.

Macatawa Area Express Transportation Authority  
Equal Employment Opportunity (EEO) Program - FY2023

Job Category (Use EEO-4)	Total		W		AI/AN		B		H/L		A		NHOPI		M	
	Male	Female	M	F	M	F	M	F	M	F	M	F	M	F	M	F
<b>1 - Officials &amp; Administrators</b>																
Total Workforce	2	3	2	2	-	-	-	-	-	-	1	-	-	-	-	-
Total Trained	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Training Rate	0.0%	0.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	N/A	0.0%	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	NA	NA	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	N/A	N/A	N/A	No	N/A	N/A	N/A	N/A	N/A	N/A
<b>2 - Professionals</b>																
Total Workforce	2	3	2	3	-	-	-	-	-	-	-	-	-	-	-	-
Total Trained	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Training Rate	0.0%	0.0%	0.0%	0.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ratio to Highest Rate	NA	NA	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	No	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>5 - Administrative Support</b>																
Total Workforce	1	8	-	5	-	-	-	-	-	-	3	1	-	-	-	-
Total Trained	-	2	-	1	-	-	-	-	-	-	1	-	-	-	-	-
Training Rate	0.0%	25.0%	N/A	20.0%	N/A	N/A	N/A	N/A	N/A	33.3%	0.0%	0.0%	N/A	N/A	N/A	N/A
Ratio to Highest Rate	NA	100.0%	N/A	60.0%	N/A	N/A	N/A	N/A	N/A	100.0%	0.0%	0.0%	N/A	N/A	N/A	N/A
Potential Adverse Impact (Yes/No)	No	No	N/A	Yes	N/A	N/A	N/A	N/A	N/A	No	Yes	Yes	N/A	N/A	N/A	N/A
<b>8 - Service &amp; Maint. Workers</b>																
Total Workforce	38	11	29	8	-	-	1	-	7	2	-	-	-	-	-	1
Total Trained	2	1	2	1	-	-	-	-	-	-	-	-	-	-	-	-
Training Rate	5.3%	9.1%	6.9%	12.5%	N/A	N/A	0.0%	N/A	0.0%	0.0%	N/A	N/A	N/A	N/A	0.0%	0.0%
Ratio to Highest Rate	57.9%	100.0%	55.2%	100.0%	N/A	N/A	0.0%	N/A	0.0%	0.0%	N/A	N/A	N/A	N/A	0.0%	0.0%
Potential Adverse Impact (Yes/No)	Yes	No	Yes	No	N/A	N/A	Yes	N/A	Yes	Yes	N/A	N/A	N/A	N/A	Yes	Yes

Notes: Only EEO-4 categories in which MAX employs staff are shown.

**NARRATIVE: RACE**—Though the low numbers involved make a proper analysis difficult, minorities in FY2022 represented 25.0% of those receiving training with advancement opportunities, and 20.0% in FY2023—while representing 22.3% of the average MAX workforce; no potential adverse impact was identified. **WOMEN**—Though the low numbers make a proper analysis difficult, *Females* in FY2022 represented 25.0% of those receiving training with advancement opportunities—and 60.0% in FY2023—while representing 38.1% of the average MAX workforce; no potential adverse impact was identified.

**DATA SOURCE:** MS Excel Sheet *EEOemploymentpracticesFY2022/23*

## Monitoring and Reporting

The EEO Officer will cumulatively monitor all employment actions, including new hires, promotions/transfers, voluntary separations/involuntary terminations, and trainings, and all identified barriers to ensure that the Equal Employment Opportunity Program is carried out in its entirety.

An important part of any successful EEO Program is establishing an effective and workable internal monitoring and reporting system to:

- Assess EEO status, document accomplishments or the lack of accomplishments to Management and the Authority Board.
- Enable agencies to evaluate their EEO Program during the year and to take any necessary corrective action regarding the development and execution of programs. FTA requires agencies to conduct such evaluations semiannually, at a minimum.
- Produce documentation that supports actions to implement the plan for minority and female job applicants or employees and informs management of the program's effectiveness.

The following EEO-related monitoring and reporting actions will be utilized by the EEO Officer—with results and needed follow up actions documented in the form of meeting minutes—and will include any related handouts or data tables. Such actions will occur according to the following scheduled frequencies:

- DAILY/ONGOING—database updates reflecting key EEO data fields: applications, hires, disciplinary actions, separations, etc.
- DAILY/ONGOING—documentation log updates related to job postings published, advertisements placed, recruitment locations and dates, etc., including documentation for any EEO-related meetings between the Executive Director and/or Human Resources personnel, and the EEO Officer (e.g., statistics on employment practices and policies, verifying that job descriptions contain legitimate position requirements, that any testing used has been validated, etc.).
- BI-YEARLY—Management Committee review of fiscal year-to-date data, including to but not limited to, hiring, promotions, status of EEO complaints, etc.
- YEARLY—a fiscal year-end review with all data accumulated, with any areas of concern reviewed in detail. Annual EEO report with findings submitted to managerial staff and the MAX Authority Board, and made available to all employees.
- YEARLY—a written reminder to all supervisory staff informing them of their general responsibilities regarding the EEO program.
- YEARLY—a submission of the EEO Program & Policy to potential recruitment entities (e.g., employment agencies, educational institutions, minority, civil rights, and women's organizations) for awareness purposes and public comment.

## Equal Employment Opportunity Program (EEO) FY2024

- YEARLY—an EEO audit that ensures:
  - EEO materials such as posters and statements are up-to-date and remain posted in appropriate locations.
  - The EEO statement, program and contact information, and complaint process remain posted on the MAX website—with live links and current, relevant information.
  - EEO information is reviewed in the new employee orientation process, and remains included with current and relevant information in the MAX Employee Handbook.
  - The EEO phrase “MAX is an Equal Opportunity Employer” is used in television, radio, newspaper, or other recruitment outreach, such as social media *blasts*, and is included on the agency’s website’s *Work Opportunities* page, and in any related printed materials.
- YEARLY—a review of the EEO program with all staff during a quarterly safety meeting; the EEO policy statement will be highlighted in the employee newsletter.
  - Sign-in sheets will be documented, listing each attendee.

Data will be monitored and tabulated by the EEO Officer with breakdowns on race, color, and sex; breakdowns will also be monitored in required areas for veterans and persons with disabilities.

Layoff guidelines or other clauses in union contracts will be monitored as needed for disparate effects on employees within protected classes. Should any barriers to equal employment be identified, MAX will work to revise any future union agreements within this area.

Additionally, all EEO complaints will be monitored and documented by the EEO Officer. A database exists that documents the name of the complainant, basis of the complaint(s), the protected group, date of initial contact, date of resolution, resolution reached, and the name of the investigator.

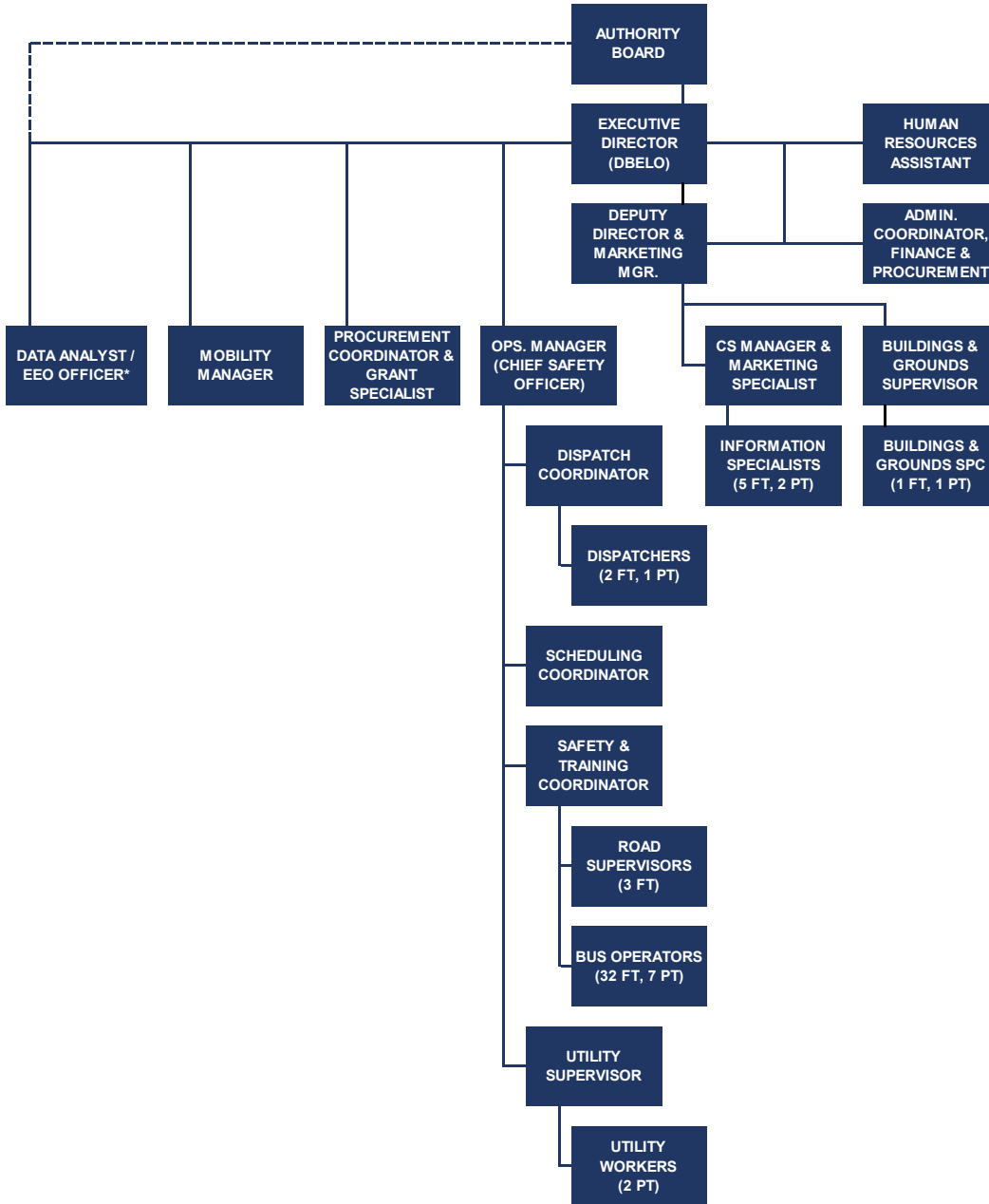
Union contracts will be reviewed at the time of their formation to ensure disparate impacts do not result.

**Monitoring of Sub-Recipients or Contractors**—MAX will require each of its sub-recipients or sub-contracting service providers to prepare and share their prospective EEO Plans on an annual basis, the requirements of which in accordance with FTA Circular 4701.1. Proof of such a review will be documented in the form of a letter or memo to the sub-recipient or contractor, as will an annual site visit to verify and document the proper display of the EEO Policy Statement and related labor law postings.

As of the date of this program update, MAX does not utilize any sub-recipients in the provision of transit service delivery.

Equal Employment Opportunity Program (EEO) FY2024

Organizational Chart: Last Updated October 2023



\*Data Analyst/EEO Officer reports to Authority Board for EEO matters, reports to Executive Director for all other areas.

## EEO Complaints

Equal Employment Opportunity discrimination complaints may be filed on the basis of race, color, religion, sex (including gender identity, sexual orientation, and pregnancy), age, national origin, disability, veteran status, or genetic information, or any other basis prohibited by local, state, or federal law, whether made in general, directed to an individual, or to a group of people regardless of whether or not the behavior was intended to harass. Types of complaints include unfair or inequitable treatment with regards to job retention, promotion, demotion, training opportunities, classification, pay, or other employee relations problems including harassment and retaliation by supervisors or other employees. A complaint must be submitted within 180 days from time of occurrence.

FTA requires applicants and recipients to adopt local procedures consistent with EEO statutes and regulations for the disposition of EEO complaints. FTA also encourages complainants to seek resolution locally and to file complaints with FTA only when dissatisfied with how the complaint was resolved or when the case is not being resolved in a timely manner.

For complaints other than discrimination and harassment, bargaining unit employees should follow the grievance procedures outlined in their union contract.

MAX has established a systematic and orderly method of hearing complaints arising out of violation of EEO statutes. The following procedural steps shall be utilized by those seeking recourse for any violation of the Equal Employment Opportunity Policy:

**STEP 1**—Anyone having an EEO complaint shall meet with the EEO Officer for a confidential consultation.

**STEP 2**—After consultation, the person bringing the complaint may decide to file a written complaint which shall be documented by the EEO Officer. A copy of the EEO complaint shall be issued to appropriate supervisory staff.

**STEP 3**—Once the written complaint is filed, the EEO Officer shall conduct an investigation and interview witnesses. This investigation shall be completed as soon as possible, in a timely manner.

**STEP 4**—Once the investigation is completed, the EEO Officer shall schedule a meeting as soon as possible to attempt to resolve the complaint. Persons at the meeting shall include the person who made the complaint, the appropriate supervisory staff, and the Executive Director.

**STEP 5**—A summary of the meeting will be documented by the EEO Officer. A copy of this summary shall be distributed to all who attended the meeting.

**STEP 6**—If the complaint is not resolved at this level, the EEO Officer will schedule another meeting with all parties involved in attempt to resolve the complaint.

**STEP 7**—The EEO Officer shall review the facts of the case and examine the entire record, and make a decision which shall constitute the final decision in the matter. The decision will be communicated in writing to the individual making the complaint, the supervisory staff involved in the matter, and the Executive Director. Every effort will be to provide this written decision within 30 days from the date that the written complaint was filed, unless extenuating circumstances exist—such as additional time needed to obtain information which would provide for the most equitable handling of the case.



## Resolution of Complaint

The EEO Officer will seek to resolve the issue on the lowest level through mediation with the complainant, their department head, and Executive Director, if necessary. Should the findings—if any—show that a violation occurred, the EEO Officer may recommend disciplinary action, if warranted. If the complainant is represented and is not satisfied by the outcome of the mediation, he/she may also file a grievance through their respective union.

Although it is FTA's practice to encourage employees and applicants to resolve issues with local agencies when possible before filing a complaint, persons unsatisfied by the outcome of EEO mediation may file a complaint within 180 days from the date of the alleged discrimination with the U.S. Department of Transportation Office of Civil Rights, or the U.S. Equal Employment Opportunity Commission:

U.S. Department of Transportation

Attention: Office of Civil Rights

1200 New Jersey Avenue, S.E.

Washington, D.C. 20590

888-446-4511

<https://www.transit.dot.gov/eo>

U.S. Equal Employment Opportunity Commission

131 M Street NE

Washington, DC 20507

800-669-4000

<http://www.eeoc.gov>

**EEO Complaint Form: Page 1/2**

***MACATAWA AREA EXPRESS TRANSPORTATION AUTHORITY***

***EQUAL EMPLOYMENT OPPORTUNITY (EEO) COMPLAINT FORM***

The Macatawa Area Express Transportation Authority (MAX) 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, disability, veteran status, or other protected class.

MAX's 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, and use of facilities.

All applicants and employees have the right to file complaints alleging discrimination. Any complaint of discrimination will be investigated thoroughly and promptly; no employee will be retaliated against for a good faith complaint.

Please complete this form in its entirety. In order to be processed, signed original complaint forms must be mailed or hand delivered to:

MAX Transportation Authority  
Attention: EEO Officer  
171 Lincoln Avenue  
Holland, MI 49423

**Section I:**

Name:		
Address:		
City:	State:	ZIP Code:
Email Address:	Home Phone:	Work Phone:

**Section II:**

Did anyone else witness the incident?     Yes     No

Please list any witnesses, including name, address, and phone number (use a separate sheet if necessary):

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**EEO Complaint Form: Page 2/2**

<b>Section III:</b>	
I believe the discrimination I experienced was based on (check all that apply):	
<input type="checkbox"/> Age	<input type="checkbox"/> Color
<input type="checkbox"/> Disability	<input type="checkbox"/> Gender/Sexual Harassment
<input type="checkbox"/> National Origin	<input type="checkbox"/> Race/Ethnicity
<input type="checkbox"/> Religion	<input type="checkbox"/> Retaliation
<input type="checkbox"/> Veteran Status	<input type="checkbox"/> Other: _____
Date of Alleged Discrimination (Month, Day, Year): _____	
Explain as clearly as possible what happened and why you believe discrimination has occurred. Please provide dates, location, and time of discrimination. Use additional sheets as necessary.	
<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>	
Indicate the person(s) you believe responsible for the discrimination (if known):	
Name(s): _____	
Work Location (if known): _____	
<b>Section IV:</b>	
What resolution would you like to occur?	
<input type="checkbox"/> Mediation	<input type="checkbox"/> Departmental Training Session
<input type="checkbox"/> Formal Grievance	
<input type="checkbox"/> Management Meeting with EEO Officer	<input type="checkbox"/> No Further Action
<input type="checkbox"/> Other	
<b>Section V:</b>	
You may attach any written materials or other information that you think is relevant to your complaint.	
<i>I hereby swear/affirm that the information provided in this EEO Complaint Form is true and correct to the best of my knowledge.</i>	
Signature: _____	Date: _____
Please submit this form in person at the address below, or mail this form to:	
MAX Transportation Authority Attention: EEO Officer 171 Lincoln Avenue Holland, MI 49423 Phone: (616) 928-2494 Email: <a href="mailto:info@catchamax.org">info@catchamax.org</a>	
<b>INTERNAL USE ONLY:</b>	
Date Received: _____	Signature/EEO Officer: _____

**Internal Job Posting Form**



**INTERNAL JOB POSTING**

<b>Job Title:</b>		<b>Supervisor (Y/N):</b>	
<b>Location:</b>		<b>Work Hours:</b>	
<b>Pay Rate/Salary Range:</b>		<b>Position Type:</b>	[FT/PT, Exempt/Nonexempt]
<b>Posting Contact:</b>		<b>Date posted:</b>	
<b>Reports to:</b>		<b>Posting Expires:</b>	
<b>Applications Accepted By</b>			
<b>Fax or E-mail:</b> (616) 928-XXXX or <a href="mailto:x.xxxxxxx@catchamax.org">x.xxxxxxx@catchamax.org</a>		<b>Mail:</b> [Posting Contact or Hiring Manager] Macatawa Area Express (MAX) 171 Lincoln Avenue, Suite 20 Holland, MI 49423	
<b>Attention:</b> [Posting Contact or Hiring Manager]			
<b>Job Description</b>			
<b>Job Summary</b> [Provide a brief position overview, including a description—if applicable—of any supervisory roles.]			
<b>Essential Roles and Responsibilities</b>			
<ul style="list-style-type: none"> <li>• Bulleted list item</li> <li>• Bulleted list item</li> <li>• Bulleted list item</li> <li>• Bulleted list item</li> <li>• Bulleted list item</li> </ul>			
<b>Qualifications and Education Requirements</b>			
<ol style="list-style-type: none"> <li>1. Numbered list item</li> <li>2. Numbered List item</li> <li>3. Numbered List item</li> <li>4. Numbered List item</li> </ol>			
<b>Preferred Skills</b> [Provide a description of any additional skills or experience that would be considered favorable for a candidate who is applying for this position.]			

**MAX is an Equal Opportunity Employer**

## Recruitment Process Checklist



### RECRUITMENT PROCESS CHECKLIST

*THIS FORM IS MEANT TO PROVIDE SPECIFIC DETAILS PERTAINING TO THE OVERALL HIRING PROCESS. A CHRONOLOGICAL CHECKLIST OF THE PRIMARY STEPS INVOLVED IS LISTED BELOW. MANAGEMENT PERSONNEL ARE AVAILABLE TO PROVIDE ASSISTANCE AND CONSULTATION THROUGHOUT THE HIRING PROCESS. SHADED AREAS MUST BE COMPLETED BY THE STAFF MEMBER INDICATED; HIRING MANAGER COMPLETES ALL OTHER CHECKS AND SIGN-OFFS (EX:   AZ  /  12-15-18  ).*

HIRING SUPERVISOR/TITLE:

POSITION/JOB TITLE SOUGHT:

DATE:

- Human Resources (HR) initiates requisition(s) including any job description updates by emailing the Executive Director and EEO Officer       /       for approval(s); or  this is an ongoing recruitment.
- Job notice(s) posted internally at both MAX facilities by HR (and a copy sent to EEO Officer) for a minimum of seven (7) days       /      ; or  this is an ongoing recruitment.
- If job opening(s) not filled internally, a summary of planned applicant search outreach—including employment websites, social media outlets, and printed ads—is emailed by HR to the Executive Director and EEO Officer       /      ; or  N/A.
- Job notice(s) posted externally by HR for a minimum of seven (7) days       /      ; or  this is an ongoing recruitment; or  N/A.
- Candidates directed to submit all application materials via the MAX website; applications completed in-person must be provided to the EEO Officer.
- Applications screened by HR for minimum qualifications; short list of candidates created.
- HR and/or hiring supervisor conducts applicant interviews; a MAX application\* is completed at this time if not initially received from the MAX website       /       (\*See Step 5 EEO requirement).
- HR and/or hiring supervisor conducts reference checks.
- Executive Director and HR and/or hiring manager select best candidate(s), establish starting wage/salary.
- EEO Officer       /       concurs with top candidate(s) and pay rate(s).
- Contingent offer extended to candidate(s) by HR and/or hiring manager.
- HR notifies the Executive Director and EEO Officer of applicant acceptance; acceptance is acknowledged.
- Required screening/testing satisfactorily completed.
- ICHAT (or State of Residency) background check completed.
- Payroll Action Order (PAO) submitted to the Executive Director for approval; approval (w/signatures) submitted to Payroll & Benefits Clerk (City of Holland), w/Cc to EEO Officer.
- New employee orientation held, all remaining HR-related paperwork completed.
- Employee forms (including this form) retained in the HR file—new employee(s) officially onboarded.

## EEO Annual Review Checklist

### Equal Employment Opportunity (EEO) Program Annual Review for FY2023

The following verification checklist has been completed as part of the annual EEO review cycle:

1. Annual EEO Review (FY2021-2022 info/data) w/MGT./Staff Committee: *Review emailed—Dec. 27, 2022; material reviewed in-person during MGT. Meeting, Greenway OPS. Building, Dec. 28, 2022.*
2. Annual EEO Review (FY2020-2021 info/data) with Authority Board: *COMPLETED—Dec. 29, 2022*
3. Written reminder to office staff, outlining EEO Program
  - a. Copy saved to file: *COMPLETED—Feb. 7, 2023*
4. Written reminder to managers & supervisors, outlining leadership responsibilities for EEO
  - a. Copy saved to file: *COMPLETED—Feb. 10, 2023*
5. Submission of EEO Program to potential recruitment agencies
  - a. Emails saved to file: *COMPLETED—Dec. 27, 2022*
6. EEO Information Audit
  - a. Federal & State Labor Law Poster w/MAX Contact Info:
    - i. Padnos Transp. Center: *2023 POSTER VERIFIED—Jan. 13, 2023*
    - ii. Greenway OPS. Building: *2023 POSTER VERIFIED—Jan. 9, 2023*
  - b. Policy Statement Posting:
    - i. Padnos Trans. Center: *VERIFIED—Dec. 27, 2022; October 26, 2023*
    - ii. Greenway Operations Building: *VERIFIED—Dec. 28, 2022; Oct. 18, 2023*
  - c. Website information: *COMPLETED—Dec. 27, 2022; October 17, 2023*
  - d. EEO Statement on employment application/website hiring page: *VERIFIED—October 17, 2023*
  - e. EEO orientation packet info: *VERIFIED—October 17, 2023*
7. EEO staff review during Safety Meetings
  - a. Presentation(s) to staff: *COMPLETED—December 12 & 14, 2023*
  - b. Handouts saved to file: *COMPLETED—February 7, 2023*
  - c. Sign-in sheets saved to file: *COMPLETED—December 14, 2023*
8. EEO statement posted annually in agency newsletter:
  - a. Copy of newsletter saved to file: *COMPLETED—Dec. 2022 ISSUE*

Recorded by: Charles Veldhoff, Data Analyst/EEO Officer

Date: December 14, 2023

# Equal Employment Opportunity Program (EEO) FY2024

## Area Labor Percent Availability by EEO-4 Job Group

Macatawa Area Express Transportation Authority  
 Equal Employment Opportunity (EEO) Program - Area Labor Percent Availability by Job Group: October 1, 2023

Job Category Use EEO-4	Salary Range	Total Workforce					Male							Female						
		All	WM	MM	WF	MF	W	AI/AN	B	H/L	A	NHOPI	Multi	W	AI/AN	B	H/L	A	NHOPI	Multi
<b>1 - Officials &amp; Administrators</b>																				
Current Workforce	\$43,077-\$105,456	4	0	0	3	1	-	-	-	-	-	-	3	-	-	-	1	-	-	-
Percent in Category	<b>^Entry</b>				75.0%	25.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	75.0%	0.0%	0.0%	0.0%	25.0%	0.0%	0.0%	0.0%
<b>Percent of Availability</b>							<b>45.8%</b>	<b>0.1%</b>	<b>0.4%</b>	<b>1.9%</b>	<b>1.1%</b>	<b>0.0%</b>	<b>0.7%</b>	<b>45.6%</b>	<b>0.2%</b>	<b>0.3%</b>	<b>2.0%</b>	<b>1.3%</b>	<b>0.0%</b>	<b>0.6%</b>
Percent Underutilized																				
Underutilized (Yes/No)							No	No	No	No	No	No	No	No	No	No	No	No	No	No
Number Needed to Reach Parity							-	-	-	-	-	-	-	-	-	-	-	-	-	-
Planned percent increase Year 1							0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Planned percent increase Year 2							0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Planned percent increase Year 3							0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Planned percent increase Year 4							0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
<b>2 - Professionals</b>																				
Current Workforce	\$43,007-\$85,238	7	3	0	4	0	3	-	-	-	-	-	4	-	-	-	-	-	-	-
Percent in Category	<b>^Entry</b>				42.9%	57.1%	42.9%	0.0%	0.0%	0.0%	0.0%	0.0%	57.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
<b>Percent of Availability</b>							<b>45.8%</b>	<b>0.1%</b>	<b>0.4%</b>	<b>1.9%</b>	<b>1.1%</b>	<b>0.0%</b>	<b>0.7%</b>	<b>45.6%</b>	<b>0.2%</b>	<b>0.3%</b>	<b>2.0%</b>	<b>1.3%</b>	<b>0.0%</b>	<b>0.6%</b>
Percent Underutilized																				
Underutilized (Yes/No)							No	No	No	No	No	No	No	No	No	No	No	No	No	No
Number Needed to Reach Parity							-	-	-	-	-	-	-	-	-	-	-	-	-	-
Planned percent increase Year 1							0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Planned percent increase Year 2							0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Planned percent increase Year 3							0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Planned percent increase Year 4							0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
<b>5 - Administrative Support</b>																				
Current Workforce	\$30,160-\$47,008	11	1	0	6	4	1	-	-	-	-	-	6	-	-	-	4	-	-	-
Percent in Category	<b>^Entry</b>				9.1%	36.4%	9.1%	0.0%	0.0%	0.0%	0.0%	0.0%	54.5%	0.0%	0.0%	0.0%	36.4%	0.0%	0.0%	0.0%
<b>Percent of Availability</b>							<b>30.2%</b>	<b>0.1%</b>	<b>0.6%</b>	<b>1.3%</b>	<b>0.6%</b>	<b>0.0%</b>	<b>0.4%</b>	<b>60.6%</b>	<b>0.2%</b>	<b>0.8%</b>	<b>3.5%</b>	<b>1.0%</b>	<b>0.0%</b>	<b>0.7%</b>
Percent Underutilized													6%							
Underutilized (Yes/No)							No	No	No	No	No	No	No	No	No	No	No	No	No	No
Number Needed to Reach Parity							-	-	-	-	-	-	-	-	-	-	-	-	-	-
Planned percent increase Year 1							0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Planned percent increase Year 2							0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Planned percent increase Year 3							0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Planned percent increase Year 4							0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
<b>8 - Service &amp; Maint. Workers</b>																				
Current Workforce	\$30,118-\$47,008	48	30	8	9	1	30	-	-	7	-	-	1	9	-	-	-	-	-	1
Percent in Category	<b>^Entry</b>				62.5%	16.7%	18.8%	2.1%	62.5%	0.2%	0.0%	14.6%	0.0%	0.0%	2.1%	18.8%	0.1%	0.0%	0.0%	0.0%
<b>Percent of Availability</b>							<b>56.7%</b>	<b>0.3%</b>	<b>1.3%</b>	<b>9.5%</b>	<b>2.3%</b>	<b>0.0%</b>	<b>1.7%</b>	<b>18.5%</b>	<b>0.2%</b>	<b>1.0%</b>	<b>5.8%</b>	<b>2.2%</b>	<b>0.0%</b>	<b>0.5%</b>
Percent Underutilized																				
Underutilized (Yes/No)							No	No	No	Yes	No	No	No	No	No	No	Yes	Yes	No	No
Number Needed to Reach Parity							-	-	-	1	-	-	-	-	-	-	2	1	-	-
Planned percent increase Year 1							0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Planned percent increase Year 2							0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Planned percent increase Year 3							0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Planned percent increase Year 4							0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%

Notes: Employment figures from 2019 American Community Survey 5-Year Estimates Detailed Tables (data.census.gov); Ottawa County, Allegan County.