

**EQUAL EMPLOYMENT OPPORTUNITY
COMPLIANCE REVIEW
OF
Bi-State Development Agency
(known as Metro)
St. Louis, Missouri**

Final Report

February 2012

**Prepared For
U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL TRANSIT ADMINISTRATION
OFFICE OF CIVIL RIGHTS**

**Prepared By
THE DMP GROUP, LLC
2233 Wisconsin Avenue NW, Ste 405
Washington, DC 20007**

Table of Contents

I.	GENERAL INFORMATION.....	1
II.	JURISDICTION AND AUTHORITIES	2
III.	PURPOSE AND OBJECTIVES	3
IV.	BACKGROUND INFORMATION	6
V.	SCOPE AND METHODOLOGY	12
VI.	FINDINGS AND RECOMMENDATIONS	19
1.	Program Submission.....	19
2.	Statement of Policy.....	21
3.	Dissemination	22
4.	Designation of Personnel Responsibility.....	25
5.	Utilization Analysis	30
6.	Goals and Timetables	32
7.	Assessment of Employment Practices.....	33
8.	Monitoring and Reporting System	37
VII.	SUMMARY OF FINDINGS.....	35
VIII.	ATTENDEES.....	42

I. GENERAL INFORMATION

Grant Recipient: Bi-State Development Agency
(known as Metro)

City/State: St. Louis, Missouri

Grantee Number: 1830

Executive Official: Mr. John Nations
President/Chief Executive Officer
Bi-State Development Agency
(known as Metro)
707 North First Street
St. Louis, Missouri 63101

On Site Liaison: Phillip Mosley
Director Workforce Diversity/EEO

Report Prepared by: The DMP Group, LLC
2233 Wisconsin Avenue, NW Suite 405
Washington, DC 20007

Site Visit Dates: November 8 – 10, 2011

Compliance Review Team: Maxine Marshall, Lead Reviewer
Gregory Campbell, Reviewer
Khalique Davis, Reviewer

II. JURISDICTION AND AUTHORITIES

The Federal Transit Administration (FTA) Office of Civil Rights is authorized by the Secretary of Transportation to conduct Civil Rights Compliance Reviews. The Equal Employment Opportunity (EEO) Reviews are undertaken to ensure compliance of applicants, recipients, and subrecipients with 49 U.S.C. Section 5332, “Non-Discrimination” and the program guidelines of FTA Circular 4704.1, “Equal Employment Opportunity Guidelines for Grant Recipients.” Further, FTA recipients are required to comply with 49 CFR Part 27, “Nondiscrimination on the Basis of Disability in Programs and Activities Receiving or Benefiting from Federal Financial Assistance.”

The Bi-State Development Agency (known as Metro), is a recipient of FTA funding assistance and is therefore subject to the EEO compliance conditions associated with the use of these funds pursuant to 49 U.S.C. Section 5332, FTA Circular 4704.1 and 49 CFR Part 27. These regulations define the components that must be addressed and incorporated in Metro’s EEO program and were the basis for the selection of compliance elements that were reviewed in this document.

III. PURPOSE AND OBJECTIVES

PURPOSE

The FTA Office of Civil Rights periodically conducts EEO Compliance Reviews of grant recipients and subrecipients to determine whether they are honoring their commitment, as represented by certification to FTA, that they are complying with their responsibilities under 49 U.S.C. Section 5332, FTA Circular 4704.1, and 49 CFR Part 27. In keeping with its regulations and guidelines, FTA determined that a Compliance Review of Metro's "Equal Employment Opportunity Program" was necessary.

The Office of Civil Rights authorized The DMP Group, LLC to conduct this EEO Compliance Review of Metro. The primary purpose of the EEO Compliance Review was to determine the extent to which Metro has met its EEO program goals and objectives, as represented to FTA, in its EEO Program Plan. This Compliance Review was intended to be a fact-finding process to: (1) examine Metro's EEO Program Plan and its implementation; (2) provide technical assistance; and (3) make recommendations regarding corrective actions deemed necessary and appropriate.

This Compliance Review did not directly investigate any individual complaints of discrimination in employment activities by the grant recipient or its subrecipients, nor did it adjudicate these issues on behalf of any party.

OBJECTIVES

The objectives of FTA's EEO regulations, as specified in FTA Circular 4704.1, are:

- To ensure that FTA applicants, recipients, subrecipients, contractors and/or subcontractors will not discriminate against any employee or applicant for employment because of race, color, creed, national origin, sex, age, or disability;
- To ensure that FTA applicants, recipients, subrecipients, contractors and/or subcontractors will take affirmative action to ensure that applicants are employed, and that employees are treated during employment without regard to race, color, creed, national origin, sex, age, or disability. Such action shall include, but not be limited to, hiring, promotion or upgrading, demotion, transfer, recruitment or recruitment advertising, layoff or termination, disciplinary actions, rates of pay or other forms of compensation, and selection for training, including apprenticeship. It shall also include a written affirmative action plan designed to achieve full utilization of minorities and women in all parts of the work force; and
- To ensure that FTA applicants, recipients, subrecipients, contractors, and/or subcontractors will post in conspicuous places and make available to employees and applicants for employment, notices setting forth the recipient's EEO policy. In addition, applicants/employees will be notified of the recipient's procedures for filing complaints of discrimination internally, as well as externally with the Federal Equal Employment Opportunity

Commission, the local human rights commission, and/or the U.S. Department of Transportation (DOT).

The objectives of this EEO Compliance Review were:

- To determine whether Metro is honoring its commitment represented by the certification to FTA that it is complying with its responsibilities under 49 U.S.C. Section 5332, “Non-Discrimination.”
- To examine the required components of Metro’s EEO Program Plan against the compliance standards set forth in the regulations and to document the compliance status of each component.
- To gather information and data regarding all aspects of Metro’s employment practices, including recruitment, hiring, training, promotion, compensation, retention and discipline from a variety of sources: Human Resources Department staff and other Metro management and staff.

IV. BACKGROUND INFORMATION

The Bi-State Development Agency known as Metro was created in September 1949 by a Compact between the States of Illinois and Missouri. It was then approved by the U.S. Congress and signed by the President. The Compact created a district known as the Bi-State Metropolitan Development District (known as Metro), which includes the City of St. Louis, Missouri and the counties of St. Louis and St. Charles, and Illinois counties of St. Clair and Madison. The population of its service area is nearly 2 million persons.

Metro is governed by a 10-member Board of Commissioners (Board) that is responsible for the overall leadership and policy direction for the Agency. The Board is comprised of five members from Missouri and five from Illinois. Missouri Board members are appointed by the Governor of Missouri. In Illinois, the Chairman of the Board for both St. Clair and Madison Counties appoint their representatives. Members of the Board serve five-year terms without compensation and must be a resident voter of their state, as well as reside within the bi-state metropolitan region.

Metro operates the St. Louis region's public transportation system, which includes a fleet of 87 light rail vehicles for the 46-mile MetroLink light rail system, 372 MetroBus vehicles that operate on 76 MetroBus routes in Missouri and Illinois, and 120 vans for the Metro Call-A-Ride service. . Metro transit operates seven days a week from 4 a.m. to 1 a.m.

Metro operates from three bus garages (Brentwood and DeBaliviere in St. Louis and the Illinois Garage in East St. Louis, IL), one central maintenance facility in St.

Louis, and two light rail facilities, one in St. Louis and the other in East St. Louis, IL. Metro's headquarters building is located in the historic Laclede's Landing area in St. Louis.

Metro also owns and operates the St. Louis Downtown Airport and surrounding industrial business park, as well as operates the Gateway Arch Revenue Collections Center, the Gateway Arch Transportation System, the Gateway Arch Riverboats, and the Gateway Arch Parking Facility.

According to Metro's most recent workforce statistics, dated June 30, 2011, Metro had 2,602 employees and minorities represented 63.9 percent of the total workforce, as follows:

- Blacks – 62 percent
- Hispanics – Less than one percent
- American Indians – Less than one percent
- Asians – Less than one percent
- Hawaiian/Pacific Islander – Less than one percent

Females represented 34.9 percent of the workforce. Approximately 2,000 of the 2,602 positions of Metro's workforce were represented by Amalgamated Transit Union and International Brotherhood of Electrical Workers.

The President/Chief Executive Officer (CEO) has the ultimate responsibility for the implementation of Metro's EEO program. The President/CEO has delegated the

responsibility for implementation of the EEO program to the Director of Workforce Diversity. The Director of Workforce Diversity reported to the Vice President of Human Resources who reported to the President/CEO. At the time of the Compliance Review and according to Metro's most recent Organization Chart, Metro was organized under the following positions reported directly to the President/CEO:

- Chief Operating Officer of Transit Services
- Senior Vice President of Engineering and New Systems Development
- Vice President of Human Resources
- Vice President of Procurement, Inventory Management, and Supplier Diversity
- Chief Financial Officer
- Vice President and Chief Information Officer
- Vice President of Government and Community Affairs
- Senior Vice President of Business Enterprises
- Vice President of Sales and Marketing
- General Counsel and Deputy Secretary

Metro also has an Audit Department that reports directly to the Board.

The following tables represent a demographic profile of the Metro service area using data from the 2000 and the 2010 Census. Table 1 shows the 2000 population and Table 2 presents the 2010 population by racial/ethnic group, the increase (or decrease) in population from 2000 to 2010, and the percentage of the racial/ethnic group population to the total population in both 2000 and 2010.

As shown in Table 3, the total population of the Metro service area increased 4.6 percent from 2000 to 2010 . The White population decreased 1.1 percent, while the Black population increased 19.8 percent, the Hispanic population increased 80.7 percent, the Asian population increased 66.1 percent, the Hawaiian/Pacific Islander population increased 65.4 percent, and the American Indian/Alaskan Native increased 10.3 percent. In 2010, 75.9 percent of the total population was White (a decrease of 4.4 percent from 2000), 18.5 percent was Black (an increase of 2.3 percent), 2.7 percent was Hispanic (an increase of 1.1 percent), 2.5 percent was Asian (an increase of 0.9 percent), Hawaiian/Pacific Islanders and American Indian/Alaskan Native were less than one percent (a negligible increase).

**Table 1 – Demographics of the Metro Service Area
2000 U.S. Census Racial/ Ethnic Breakdown**

Racial/ Ethnic Group	St. Louis County, MO		St. Charles County, MO		St. Clair County, IL		Madison County, IL	
	Num.	%	Num.	%	Num.	%	Num.	%
White	780,830	76.8%	268,756	94.7	173,970	67.9%	233,645	90.2%
Black	193,306	19.0%	7,635	2.7%	73,666	28.8%	18,935	7.3%
American Indian and Alaska Native	1,717	0.2%	657	0.2%	665	0.3%	700	0.3%
Asian	22,606	2.2%	2,414	0.9%	2,322	0.9%	1,542	0.6%
Hawaiian/ Pacific Islander	251	0.0%	71	0.0%	116	0.0%	54	0.0%
Other Race	4,775	0.5%	1,301	0.5%	2,040	0.8%	1,269	0.5%
Two or More	12,830	1.3%	3,049	1.1%	3,303	1.3%	2,796	1.1%
Hispanic Origin ¹	14,577	1.4%	4,176	1.5%	5,604	2.2%	3,925	1.5%
Total	1,016,315	100%	283,883	100%	256,082	100%	258,941	100%

**Table 2 – Demographics of the Metro Service Area
2010 U.S. Census Racial/ Ethnic Breakdown**

Racial/ Ethnic Group	St. Louis County, MO		St. Charles County, MO		St. Clair County, IL		Madison County, IL	
	Num.	%	Num.	%	Num.	%	Num.	%
White	701,948	70.3%	327,018	90.7%	174,458	64.6%	237,641	88.2%
Black	233,029	23.3%	14,960	4.1%	82,302	30.5%	21,235	7.9%
American Indian and Alaska Native	1,962	0.2%	851	0.2%	652	0.2%	659	0.2
Asian	34,597	3.5%	7,850	2.2%	3,276	1.2%	2,254	0.8%
Hawaiian/ Pacific Islander	307	0.0%	173	0.0%	277	0.1%	107	0.0%
Other Race	8,515	0.9%	3,323	0.9%	3,133	1.2%	2,427	0.9%
Two or More	18,596	1.9%	6,310	1.8%	6,008	2.2%	4,959	1.8%
Hispanic Origin ¹	25,024	2.5%	9,983	2.8%	8,785	3.3%	7,313	2.7%
Total	998,954	100%	360,485	100%	270,056	100%	269,282	100%

¹ Per the 2000 and the 2010 Census, people of Hispanic origin can be, and in most cases are, counted in two or more race categories.

Table 3 – Changes in Demographics of the Metro Service Area

Racial/ Ethnic Group	Metro Total Service Area 2000		Metro Total Service Area 2010		Change in Metro’s Service Area		
	Number	Percent	Number	Percent	Number	Percent change ethnic group	Percent change total population
White	1,457,201	80.3%	1,441,065	75.9%	(16,136)	(1.1)%	(4.4)%
Black	293,542	16.2%	351,526	18.5%	57,984	19.8%	2.3%
American Indian and Alaska Native	3,739	0.2%	4,124	0.2%	385	10.3%	0.0%
Asian	28,884	1.6%	47,977	2.5%	19,093	66.1%	0.9%
Hawaiian/Pacific Islander	492	0.0%	814	0.0%	322	65.4%	0.0%
Other Race	9,385	0.5%	17,398	0.9%	8,013	85.4%	0.4%
Two or More	21,978	1.2%	35,873	1.9%	13,895	63.2%	0.7%
Hispanic Origin ²	28,282	1.6%	51,105	2.7%	22,823	80.7%	1.1%
Total	<u>1,815,221</u>	<u>100%</u>	<u>1,898,777</u>	<u>100%</u>	<u>83,556</u>		<u>4.6%</u>

² Per the 2000 and the 2010 Census, people of Hispanic origin can be, and in most cases are, counted in two or more race categories.

V. SCOPE AND METHODOLOGY

The following required EEO program components specified by the FTA are reviewed in this report:

1. Program Submission – A formal EEO program is required of any recipient that both employs 50 or more transit-related employees (including temporary, full-time or part-time employees either directly employed and/or through contractors) and received in excess of \$1 million in capital or operating assistance or in excess of \$250,000 in planning assistance in the previous federal fiscal year. Program updates are required every three years.
2. Statement of Policy – An EEO Program must include a statement issued by the CEO regarding EEO policy affecting all employment practices, including recruitment, selection, promotions, terminations, transfers, layoffs, compensation, training, benefits, and other terms and conditions of employment.
3. Dissemination – Formal communication mechanisms should be established to publicize and disseminate the recipient’s EEO policy, as well as appropriate elements of the program, to its employees, applicants, and the general public.
4. Designation of Personnel Responsibility – The importance of an EEO program is indicated by the individual the agency has named to manage the program and the authority this individual possesses. An executive should be appointed as Manager/Director of EEO who reports and is directly responsible to the agency’s CEO.
5. Utilization Analysis – The purpose of the utilization analysis is to identify those job categories where there is an underutilization and/or concentration of minorities and women in relation to their availability in the relevant labor market.
6. Goals and Timetables – Goals and timetables are an excellent management tool to assist in the optimum utilization of human resources.
7. Assessment of Employment Practices – Recipients, subrecipients, contractors and subcontractors must conduct a detailed assessment of present employment practices to identify those practices that operate as employment barriers and unjustifiably contribute to underutilization.

8. Monitoring and Reporting System – An important part of any successful EEO program is the establishment of an effective and workable internal monitoring and reporting system.

METHODOLOGY

The initial step of this EEO Compliance Review consisted of consultation with the FTA Region VII Civil Rights Officer and Civil Rights Headquarters staff regarding the decision to conduct a Compliance Review of Metro. Relevant documents from FTA’s files were reviewed as background. Next, an agenda letter was prepared and sent to Metro by FTA’s Office of Civil Rights. The agenda letter notified Metro of the planned Compliance Review, requested preliminary documents, and informed Metro of additional documents needed and areas that would be covered during the on-site portion of the Review. It also informed Metro of the staff and other organizations and individuals that would be interviewed. The following documents were requested:

FTA Circular 4704.1 Requirement/ Documentation to Be Provided Prior to the Site Visit
0. Background
a) Description of Metro’s Services and Organization Structure
b) Summary Listing of EEO Complaints and Lawsuits against Metro during the last three years (September 1, 2008 – August 31, 2011) alleging discrimination towards an employee or job applicant. The summary shall indicate the date of the complaint, if the complaint was filed internally or externally, the basis for discrimination, the date the complaint was resolved or if the complaint is still open.
c) Collective Bargaining Agreements covering the past three years for each bargaining unit, if applicable.
1. Program Submission (FTA C. 4704.1.II, 5.)
a) No documents requested for this area
2. Statement of Policy (FTA C. 4704.1.III, 2.a.)
a) Copy of EEO Policy issued by CEO
3. Dissemination (FTA C. 4704.1.III, 2.b.)
a) Documentation of Internal Dissemination of EEO Policy
b) Documentation of External Dissemination of EEO Policy
4. Designation of Personnel Responsibility for EEO (FTA C. 4704.1.III, 2.c.)
a) Copy of Position/Job Description for EEO Officer and EEO Staff
b) Organization Chart showing EEO Officer Reporting Relationship

**FTA Circular 4704.1 Requirement/
Documentation to Be Provided Prior to the Site Visit**

5. Utilization Analysis (FTA C. 4704.1.III, 2.d.)

- a) Utilization Analysis for 2010 and 2011 prepared in accordance with FTA Circular 4704.1 Chapter III 2.d.

6. Goals and Timetables (FTA C. 4704.1.III, 2.e.)

- b) Goals and Timetables for 2010 and 2011 prepared in accordance with FTA Circular 4704.1 Chapter III 2.e.

7. Assessment of Employment Practices (FTA C. 4704.1.III, 2.f.)

- a) A copy of personnel policy guides, handbooks, regulations, or other material that govern employment practices.
- b) A list of all recruitment sources used during the last year, including the name and telephone numbers of contact persons.
- c) A listing of all job titles for which written examinations are conducted.
- d) A listing of all job titles for which medical or physical examinations are conducted.
- e) A copy of any analysis of employment practices performed by Metro in the past three years (e.g., minority and female hires and promotions compared to applicant pool, or minority and female discipline compared to current workforce).
- f) Data on new hires for 2010 and 2011 for each job title or job group. Provide the total number of applicants and the total number of hires, by job title, as well as the number of minority group and female applicants and hires, for the past three years.
- g) Data on competitive promotions for the past three years for each job title or job group. Provide the total number of promotions, as well as the number of minority group and female employee promotions. Indicate the departments from which and to which the employees were promoted.
- h) Data on average salaries or wages paid, during the past three years, by job title or job group, to all employees, as well as the average salaries or wages paid to minority and female employees.
- i) Data on employer sponsored training offered during the past three years. Provide the total number of employees participating in each training course, as well as the number of minority group and female participants. Indicate if training was mandatory, or if supervisors authorized employee participation on a case-by-case basis.
- j) Data on terminations for 2010 and 2011 for each job title or job group. Provide the total number of employee terminations, as well as the number of minority group and female employee terminations. Indicate if the terminations were voluntary or involuntary.
- k) Data on all demotions, suspensions, and disciplinary actions above the level of oral warning for the past three years for each job title or job group. Provide the total number of demotions, suspensions, and disciplinary actions, as well as the number of minority group and female employee demotions, suspensions, and disciplinary actions. Indicate the departments in which these employees worked when they were demoted, suspended or disciplined.

8. Monitoring and Reporting (FTA C. 4704.1.III, 2.g.)

- a) Procedures describing Metro's system for monitoring EEO accomplishments and reporting to management/board on a periodic basis.
- b) A report on the results of Metro's goals for the 2010 and 2011 affirmative action plan (AAP) years. For goals not attained, a description of the specific good faith efforts made to achieve them.
- c) A description of the procedures and criteria used by Metro to monitor its subrecipients and contractors to determine compliance with FTA EEO requirements.

**FTA Circular 4704.1 Requirement/
Documentation to Be Provided Prior to the Site Visit**

- d) Copies of EEO Programs from subrecipients and contractors that employ 50 or more transit-related employees.

Metro assembled most of the documents prior to the site visit and provided them to the Compliance Review team for advance review. Other documents were provided during the site visit.

Metro's site visit occurred November 8 – 10, 2011. The Entrance Conference was conducted at the beginning of the Compliance Review with Metro's senior management staff and the contractor Review team. During the Entrance Conference, the Review team explained the goals of the Review and the needed cooperation of staff members. The detailed schedule for conducting the on-site visit was discussed.

Following the Entrance Conference, the Review team conducted a detailed examination of documents submitted by Metro's Director Workforce Diversity on behalf of the agency. The Review team also held discussions with the Director Workforce Diversity/EEO, as Metro's EEO Officer, regarding the implementation of the EEO Policy/Program.

The next day, a group interview was conducted with members of Metro's Human Resources staff to learn about Metro's employment practices, including recruitment, testing, hiring, promotions, transfers, disciplines and terminations. Files and records of employment actions, such as new hires, promotions, demotions, and terminations, were requested and reviewed.

Throughout the three-day site visit, interviews were also conducted with selected employees and managers in Metro's management offices at 707 North First Street and the DeBaliviere bus garage.

Following the site visit, Metro provided additional data and documents to the Review team that was used to complete this Compliance Review report.

Staff Interviews

Ten staff members were independently selected by the Review team for interviews. The staff members selected were an ethnically and gender diverse group and included hourly and salaried employees. Staff members' tenure with Metro ranged from two to twenty-six years. The staff mentioned that Metro was a diverse organization that provided opportunities for promotions.

The general consensus was that there was little or no knowledge of the EEO Officer or EEO's role within the organization. While a couple staff members mentioned several departments that did not have adequate female and/or minority representation, the majority of staff members interviewed felt that there was adequate minority and female representation at Metro. In addition, with one exception, staff members across the board indicated that they were able to take training classes. Also, only two staff members were aware of any internal complaints filed through the EEO Office and they felt that the complaints were adequately addressed.

Some of the staff expressed an interest in receiving periodic updates and additional information about the role of EEO in the agency. Several individuals thought that

updated and targeted diversity training would be helpful. Other suggestions were to make the program better known in the agency and that the EEO Officer should increase his visibility.

At the end of the site visit, an Exit Conference was held with Metro's senior management staff, FTA Headquarters staff, FTA Region VII Civil Rights Officer, and the contractor Review team. At the Exit Conference, initial findings and corrective actions were discussed with Metro. A complete list of attendees at the EEO Compliance Review is included in Section VIII of this report.

VI. FINDINGS AND RECOMMENDATIONS

The EEO Compliance Review focused on Metro's compliance with eight specific requirements of FTA Circular 4704.1. This section describes the requirements and findings at the time of the Compliance Review site visit.

Deficiencies were identified in the following three areas: *Designation of Personnel Responsibility*, *Assessment of Employment Practices*, and *Monitoring and Reporting System*.

Following the site visit, on February 17, 2012, Metro submitted documentation of corrective action to close one deficiency in the area of *Monitoring and Reporting System*. Metro also described several actions it will take to address the outstanding deficiencies in *Designation of Personnel Responsibility*, *Assessment of Employment Practices*, and *Monitoring and Reporting System*.

1. Program Submission

Requirement: A formal EEO program is required of any recipient that both employs 50 or more transit-related employees (including temporary, full-time or part-time employees either directly employed and/or through contractors) *and* received in excess of \$1 million in capital or operating assistance or in excess of \$250,000 in planning assistance in the previous federal fiscal year. Program updates are required every three years.

Finding: During this Compliance Review of Metro, no deficiencies were found FTA requirements for Program Submission. Prior to the site visit, Metro provided its most recent EEO Program Plan submission, entitled *Metro, (Bi-State Development Agency), Affirmative Action Plan, March 1, 2010*, (Metro AAP) to FTA on January 29, 2010. The Metro AAP was comprised of the following areas:

- Introduction
- Overview
- Executive Summary
- Good Faith Achievements of the Prior Plan Year
- Prohibition of Sexual and Other Harassment Policy
- Affirmative Action /EEO Statement
- Designation of Responsibility
- Dissemination of Policy Internally
- Dissemination of Policy Externally
- Identification of Problem Areas/Goals and Timetables
- Action Oriented Programs
- Procedures For Filing Complaints of Discrimination
- Requirement for Filing a Complaint
- Internal Audit and Reporting Systems
- Religion and National Origin Discrimination Guidelines
- Current Plan Year Analysis
- 2010 Placement Goals
- Tab 2: Metro Disable and Veterans AAP

The FTA Headquarters Civil Rights Program Analyst approved the Metro AAP submittal on February 18, 2010. This approval expires on February 18, 2013.

2. Statement of Policy

Requirement: An EEO Program must include a statement issued by the CEO regarding EEO policy affecting all employment practices, including recruitment, selection, promotions, terminations, transfers, layoffs, compensation, training, benefits, and other terms and conditions of employment.

Finding: During this Compliance Review of Metro, no deficiencies were found with FTA requirements for Statement of Policy. Prior to the site visit, Metro provided the Review team with its *Affirmative Action/EEO Statement* (AA/EEO Statement) dated February 1, 2011, that was signed by Metro’s President and CEO. The Policy Statement did not contain all of the required elements of a Statement of Policy as described in FTA Circular C 4704.1 as indicated in the table below.

FTA C. 4704.1 Policy Statement Requirements	Metro AA/EEO Statement
Issued by CEO	Yes
Commitment to EEO	Yes
Undertake an Affirmative Action Program	Yes
EEO Program Assignment to Agency Executive	No
Management Personnel Share Responsibility	Yes
Applicants/Employees Right to File Complaints	Yes
Performance by Managers/Supervisors Evaluated	No
Successful Achievement Provides Benefits	Yes

As noted in the table, the policy statement did not specifically identify who the executive was responsible for Metro’s EEO Program and it did not describe that management and supervisors would be evaluated on their accomplishment of EEO goals.

During the site visit, the Review team received a revised copy of Metro's AA/EEO Statement, dated November 9, 2011, that included all of the required elements as described in FTA Circular C 4704.1 and was signed by the President and Chief Executive Officer.

3. Dissemination

Requirement: Formal communication mechanisms should be established to publicize and disseminate the agency's EEO policy as well as appropriate elements of the program, to its employees, applicants and the general public.

Finding: During this Compliance Review of Metro, no deficiencies were found with FTA requirements for Dissemination. Included in the Dissemination of Policy sections of Metro's AAP was the following list of methods used to disseminate its EEO Policy internally and externally:

Internal Communications

- *The EEO Policy is included in the Agency Handbook*
- *Special meetings with management and supervisory personnel will be conducted to explain the intent of the policy and individual responsibilities for effective implementation*
- *Information concerning the EEO Policy is distributed during employee orientation*
- *Information concerning the EEO Policy will be included in Agency publications*
- *The EEO Policy will be conspicuously placed on employee bulletin boards.*

- *Nondiscrimination clauses are included in all union agreements; all contract provisions are reviewed to ensure that they are nondiscriminatory.*
- *The Agency will communicate to employees the existence of the Affirmative Action Plan and program at orientation and make available such elements of the program that will enable employees to know and avail themselves of its benefits.*
- *Union officials will be informed of the policy, and their cooperation will be requested.*
- *Employees who are minorities, females, or have disabilities are invited to meet with the Director of Workforce Development for program suggestions via memo sent to the facilities.*

External Communications

- *Recruitment sources will be informed verbally and in writing of the Agency's policy regarding non-discrimination*
- *Minority organizations such as the Urban League of St. Louis and Hispanic Chamber of Commerce, and other similar organizations are informed of Metro's Equal Employment Opportunity policy. Metro will also inform community leaders, secondary schools and colleges of the Agency's program.*
- *Recruitment advertisements will state that Metro is an Equal Opportunity Employer.*
- *The Agency incorporates the Equal Opportunity Clause in specifications for the Procurement process and employs a Disadvantage Business Enterprise Department to make sure that minority and female businesses are included in the Metro purchasing program.*
- *Minority organizations and newspapers are notified when Metro has a job opening that is not filled internally.*
- *The Metro employment application will continue to be periodically reviewed to determine compliance with the latest State and Federal EEO/AAP regulations to ensure that each applicant is provided the maximum opportunity to display his/her job related qualifications.*

- *Notification of Metro's policy will be sent to all subcontractors, vendors and suppliers requesting appropriate action on their part.*

Prior to the site visit, Metro provided its Employment Application that included the following statement:

Metro considers applicants for positions without regard to ethnicity, race, religion, gender, national origin, age, veteran status, disability, or any other legally protected status.

Also prior to the site visit, the Review team noted the following on Metro's website under the *Careers* section:

Metro – Equal Employment Opportunity M/F/D/V

Metro is proud to be an Equal Opportunity Employer, supporting diversity in the workplace. We provide equal opportunity to all qualified individuals regardless of race, color, religion, age, sex, national origin, veteran status, disability, or any other factor protected by law.

A further review of Metro's website revealed that while the statement above was included in the *Career* section, the *Non-Discrimination Notice* section did not include the Agency's AA/EEO Statement.

During the site visit, the Review team observed that the AA/EEO Statement was posted throughout its facilities. Metro also provided the following documents during the site visit:

- The information distributed to new employees during orientation that refers to the EEO Policy
- An Employment application with the following statement:

Metro considers applicants for positions without regard to ethnicity, race, religion, gender, national origin, age veteran status, disability, or any other legally protected status.

- A recruitment advertisement and a job posting which included: *Metro was an Equal Employment Opportunity M/F/D/V.*

Prior to the site visit, Metro had not disseminated its AA/EEO Statement to regular recruitment sources and Metro could not provide documentation that the policy statement had been distributed externally as described in its AA/EEO Statement.

During the site visit, Metro provided documentation that it had disseminated its November 9, 2011 AA/EEO Statement internally and externally. The AA/EEO Statement was posted on Metro's intranet for internal dissemination and the internet for external dissemination. The policy statement was also sent to several of Metro's recruitment resources. Metro has disseminated its AA/EEO Statement as required in FTA Circular C 4704.1.

4. Designation of Personnel Responsibility

Requirement: The importance of an EEO program is indicated by the individual the agency has named to manage the program and the authority this individual possesses. An executive should be appointed as Manager/Director of EEO who reports and is directly responsible to the agency's CEO.

Finding: During this Compliance Review of Metro, deficiencies were found with FTA requirements for Designation of Personnel Responsibilities. The Program Guidelines of FTA Circular 4704.1 Chapter III, 2c states:

An executive should be appointed as Manager/Director of EEO who reports and is directly responsible to the agency's CEO. Since managing the EEO program requires a major commitment of time and resources, the Manager/Director of EEO should be given top management support and assigned a staff commensurate with the importance of this program.

According to the Organization Chart provided by Metro prior to the site visit, the Director Workforce Diversity/EEO was the designated EEO Officer. On this Organizational Chart, the Director Workforce Diversity/EEO was not assigned to any of the major departments, and reported directly to the CEO. Prior to the site visit, Metro provided a job descriptions for the Director Workforce Diversity/EEO. According to the job description, the Director Workforce Diversity/EEO was in the Human Resources Department, yet reported to the President and Chief Executive Officer.

The Program Guidelines of FTA Circular 4704.1 Chapter III, 2c provide for nine program responsibilities, summarized in the table below, which the EEO Officer was expected to carry out as part of his/her job. The following table identifies the EEO Officer program responsibilities as outlined in the FTA Circular and whether these responsibilities were included in the job description for the Director Workforce Diversity/EEO job functions provided as outlined in FTA Circular 4704.1.

EEO Officer Program Responsibilities (FTA Circular 4704.1 III.2.c)	Director Workforce Diversity/EEO Job Description
Develop EEO Policy/Program	Yes
Assist Management in Data Needs, Setting Goals and Timetables, etc.	Yes
Internal Monitoring and Reporting System	Yes
Reporting Periodically to CEO on EEO Progress	Yes
Liaison to Outside Organizations/Groups	Yes
Current Information Dissemination	Yes
Recruitment Assistance/Establish Outreach Sources	No
Concur in All Hires/Promotions	No
Process Employment Discrimination Complaints	Yes

According to the job description provided, the Director Workforce Diversity/EEO did not concur on any hires or promotions or assist in recruiting minority, handicapped, and women applicants. Included in the Designation of Responsibility section in Metro's AAP was a list of the Director Workforce Diversity/EEO's responsibilities. The list of responsibilities included concurring in all hiring and promotion decisions. As depicted in the organizational chart provided by Metro prior to the site visit, there was no staff dedicated to the the Director Workforce Diversity/EEO in his capacity as EEO Officer.

During the site visit, Metro explained that the Director Workforce Diversity/EEO did not have a direct reporting relationship to the CEO as depicted in the job description, the AAP, and the Organization Chart. Prior to the submission and approval of Metro's 2010 AAP, the Director Workforce Diversity/EEO position had been reorganized in order to comply with the requirements of FTA circular 4704.1. The AAP and Organizational Chart provided prior to the site visit were changed to reflect these changes, however, the changes were not implemented. In addition, the collateral duties for the Director Workforce Diversity/EEO included the Manger of Recruitment, which is a direct conflict of interest to his serving as EEO Officer. The Director Workforce Diversity/EEO had been serving in this additional capacity for over 18 months. There were three recruiters who reported to the Director Workforce Diversity/EEO in his management of recruitment role. The additional responsibilities in serving as the Manager of Recruitment included signing off on all terminations. In his capacity as EEO Officer and as Manager of Recruitment, the Director Workforce Diversity/EEO reported to the Vice President of Human Resources.

Following the issuance of the Draft Report, on February 17, 2012, Metro submitted documentation to address the issue of the EEO Officer not concurring on all new hires or promotions or assisting in recruiting minority, handicapped, and women applicants:

The EEO Officer meets at least monthly with the HR Recruitment staff to review job openings and to discuss AAP hiring goals and achievements for minorities, women, persons with disabilities, and veterans. The EEO Officer currently reviews all competitive new hire selections. "Roundtable" sessions are conducted with the EEO Officer and recruitment staff to review new hire selections; meeting discussions are documented. Meetings summaries are maintained in the file records of the EEO Officer.

To ensure that Metro hiring opportunities are widely communicated to special interest groups representing minorities, the disabled, female and veteran groups, the EEO Officer manages an active outreach program. Direct communications are transmitted to special interest groups in the Metro area. The EEO Officer and the HR recruitment staff work together to create formal partnerships with external "professional, trade and advocacy groups." The outreach goal is to ensure that job opportunities are effectively communicated to all aspects of the community and hiring opportunities are open to targeted groups.

The implementation date for these two items was October 2012 and the current status was listed as "Ongoing." Also included in the submission were three documents to address the Designation of Personnel Responsibilities issue. One was a document entitled *Roundtable Job review January 2012*, which appeared to evidence one of the "Roundtable" sessions mentioned above; another was a document entitled *AAP Outreach*, which contained letters to three different organizations regarding "Employment Assistance" to assist Metro with recruiting (two of which were to agencies that supported specific groups – members of the Air Force and their families) and the disabled (Paraquad); and the third was a Job

Description for the Director Workforce Diversity/EEO (Metro's designated EEO Officer position.) While the information provided does appear to begin to address the requirement of the EEO Officer to assist in recruiting minority, handicapped, and women applicants and to establish outreach sources for use by hiring officials; and while it does state that *The EEO Officer currently reviews all competitive new hire selections and Review(s) personnel actions*, it does not specifically address the requirement to concur on all hires and promotions. Further, there were no procedures to describe who would concur and at what point during the hiring or promotion process.

In its February 17, 2012, response, Metro indicated the following to address the conflict of interest issue:

The EEO Officer is currently transitioning to remove all HR function duties from his designated position responsibilities. The President has restructured the reporting and operating responsibility of the EEO Officer, and under the restructured organizational alignment, the EEO Officer reports "directly" to the President for EEO matters. Previous Human Resources Department duties will be eliminated from the EEO Officer's daily and strategic job responsibilities following a short transition period; the EEO Officer Job Description has been revised to reflect noted changes. The EEO Officer's work space has been physically relocated away from the HR Department to further signal the separation and "objective nature" of the EEO Officer's duties.

The updated reporting alignment will be revised in the Agency Organization Chart; notice of the change will be communicated to employees through memorandum and Intranet announcement on April 2, 2012. (Copy will be forwarded to FTA when transmitted in early April.)

The implementation date for these actions was April 2012 and the Current Status was listed as "In Progress." The Job Description for the Director Workforce Diversity/EEO submitted indicated that the position now resides in the EEO

Department instead of in the Human Resources department as noted in the prior job description.

Corrective Action and Schedule: Within 120 days, Metro must submit to the FTA Program Analyst in the FTA Headquarters Office of Civil Rights:

- Documentation that the EEO Officer (Director Workforce Diversity/EEO) concurs on all hires, assists in recruiting minority, persons with disabilities, and female applicants, (e.g., copies personnel requisition/action forms for all hires and promotions for the past 90 days showing EEO Officer concurrence.) Metro must also provide documentation that the EEO Officer has established outreach resources for use by hiring officials as outlined in FTA C 4704.1. This change must occur immediately, not at Metro's proposed implementation date of October 2012.
- Documentation that the EEO function has been separated from Human Resources and that the EEO Officer has met with the Executive Director/Chief Executive Officer on EEO matters during the past 90 days. Metro should provide copies of the notification of the organizational changes to employees, as well as calendar appointments or agendas between the EEO Officer and CEO. This change must occur immediately, not at Metro's proposed implementation date of April 2012.

5. Utilization Analysis

Requirement: The purpose of the utilization analysis is to identify those job categories where there is an underutilization and/or concentration of minorities and women in relation to their availability in the relevant labor market.

Finding: During this Compliance Review of Metro, no deficiencies were found with FTA requirements for Utilization Analysis. Prior to the site visit, Metro provided the Review team with a copy of its most recent Utilization Analysis for the period as of June 30, 2011. Metro's AAP also contained its Utilization Analysis dated as of December 31, 2009. In the section entitled *Identification of Problem*

Areas/Goals and Timetables was a discussion of the areas identified as underutilized and Metro's plan for addressing the underutilization. Metro's Utilization Analysis for the period as of June 30, 2011, contained information on the number and percentage of employees by gender and ethnicity for nine job categories. The workforce analysis was categorized into the following job categories:

- Executive Senior Level officials and managers
- First/Mid Level Officials and Managers
- Professionals
- Technicians
- Protective Service
- Administrative Support Workers
- Skilled Craft Workers
- Service Maintenance
- Operators

The Utilization Analysis contained information on the number and percentage of employees in each job category by gender and ethnicity, the percentages for the available workforces, the resulting percentage of underutilization, and numerical goals.

Key findings of the workforce analysis showed:

- Metro's 2011 total workforce was 2,602 employees
- Total Hispanic representation at Metro was less than one percent
- Total Black representation at Metro was 62 percent
- Total Female representation at Metro was 34.9 percent

6. Goals and Timetables

Requirement: Goals and timetables are an excellent management tool to assist in the optimum utilization of human resources.

Finding: During this Compliance Review of Metro, no deficiencies were found with FTA requirements for Goals and Timetables. The Program Guidelines of FTA Circular 4704.1 Chapter III, 2e state:

Goals and timetables are an excellent management tool to assist in the optimum utilization of human resources. 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.

Long-range goals are usually stated as percentages, although numerical projections are recommended where feasible.

Short-term or intermediate numerical goals should be set and pursued in order to assure accomplishment of long-range goals.

Prior to the site visit, Metro provided its goals and timetables for 2010. The worksheet contained its 2010 short-term goals and timetables for its long-range four-year goals. The following information was provided for the goals for each job category:

- Anticipated number of job openings
- Method for filling anticipated job opening
- Numerical goals for program year
- Percentage rate of additions for minorities and females
- The anticipated workforce as of July 2011
- Four year percentage goals

Goals were established to correct the underutilization for the following areas over a four-year period as follows:

- First/Mid Level Officials and Managers: Women – 9.2 percent
- Professionals: Women – 9.8 percent
- Technicians: Women – 32.7 percent, Minorities – 6.1 percent
- Protective Services: Women – 3.4 percent
- Skilled Craft Workers: Women – 4.6 percent
- Operators: Women – 12.7 percent

The long-range goals were designed to eliminate underutilization in job categories where it was identified. Metro also provided two documents entitled *Audit Good Faith Effort 2010* and *Audit Good Faith Effort 2011*. The documents included detailed discussion of Metro's annual evaluation on the performance of its goals.

7. Assessment of Employment Practices

Requirement: Recipients, subrecipients, contractors and subcontractors must conduct a detailed assessment of present employment practices to identify those practices that operate as employment barriers and unjustifiably contribute to underutilization.

Finding: During this Compliance Review of Metro, deficiencies were found with FTA requirements for Assessment of Employment Practices. Metro did not provide documentation that it had regularly conducted qualitative or quantitative assessments of employment practices.

FTA Circular 4704.1 requires grantees to undertake a qualitative and quantitative analysis of employment practices to identify those practices that operate as employment barriers and unjustifiably contribute to underutilization, as follows:

Qualitative analyses should include narrative descriptions of the following:

- *Recruitment and employment selection procedures from the agency's last EEO submission.*
- *Seniority practices and provisions, upgrading and promotion procedures, transfer procedures, and formal and informal training programs from the last EEO submission.*
- *Procedures and practices regarding wages, salary levels, and other forms of compensation and benefits.*
- *Disciplinary procedures and discharge and termination practices.*
- *Assessment of the impact of external factors (not knowing where to apply for jobs, the availability of bilingual materials and information)*

Quantitative analyses should include the following statistical data by race, national origin, and sex in the past year:

- *Number of job applicants and the number of individuals offered employment.*
- *Number of employees in each job category that applied for a promotion or transfer, and the number of employees who were promoted or transferred in the past year.*
- *Number of disciplinary actions and terminations (by type) in the past year.*

Prior to the site visit, Metro provided some quantitative and summary information for the past three years for new hires, competitive promotions, terminations, and disciplinary actions. The table below summarizes the qualitative and quantitative analysis of employment practices required per FTA C. 4704.1 found in the reports provided by Metro.

Metro's Assessment of Employment Practices	
Quantitative and Qualitative Analysis (FTA Circular 4704.1 III.2.f)	
Narrative Description and Analysis:	
Recruitment and employment selection procedures from the agency's last EEO submission.	No
Seniority practices and provisions, upgrading and promotion procedures, transfer procedures, and formal and informal training programs from the last EEO submission.	No
Procedures and practices regarding wages, salary levels, and other forms of compensation and benefits.	No
Disciplinary procedures and discharge and termination practices.	No
Assessment of the impact of external factors (not knowing where to apply for jobs, the availability of bilingual materials and information)	No
Proposed program of remedial, affirmative actions to address problem areas	No
Statistical Data:	
Number of job applicants and the number of individuals offered employment.	Yes
Number of employees in each job category that applied for a promotion or transfer, and the number of employees who were promoted or transferred in the past year.	Yes
Number of disciplinary actions and terminations (by type) in the past year.	Yes

Metro's summary reports on its 2010 and 2011 new hires, competitive promotions, terminations, and disciplinary actions contained a breakdown of the information by each year into the various job groups by gender and ethnicity. Metro's new hire and competitive promotions reports included applicant data.

Metro's reports entitled *Audit Good Faith Efforts 2010* and *Audit Good Faith Efforts 2011* documented the quantitative assessments of the changes in the makeup of the workforce by job category for minorities and females. There was no discussion of trends or analysis of Metro's performance relative to the short-term goals set for the

period reviewed. Metro did not perform any analysis to identify those practices that operated as employment barriers and unjustifiably contributed to underutilization.

During the site visit, the Review team provided technical assistance on the type of Employment Practices analyses that can be performed. For example, the Review team showed Metro analyses of its 2011 promotions and disciplinary actions data, matching the job category for minorities and females provided for each of these employment practices to the current makeup of Metro's workforce and looking for any outliers.

Following the issuance of the Draft Report, on February 17, 2012, Metro submitted the following to address the issue of lacking qualitative and quantitative assessments of employment practices for the past three years:

Metro has revised the Employment Practices Assessment process using the FTA suggested Excel Spreadsheet format; data is collected for promotions, terminations, suspensions, discipline, etc. Data will be collected and analyzed on a monthly basis. Quarterly or as needed trend and progress reports will be compiled for distribution to the President, General Counsel, VP Human Resources, the Board and other Agency managers. The EEO Officer will meet monthly with the President to track and report trends and accomplishments.

The implementation date for these actions was February 2012 and the current status was listed as "Ongoing." Also included in the submission were two documents to address the Designation of Personnel Responsibilities issue. One was a document entitled *Employment Practices Chart 09-10-11(audit)*, which evidenced Metro's revised Employment Practice Assessment mentioned above (for 2011); and the other was a document entitled *2011 Workforce Analysis Chart (Audit)*, which evidenced Metro's 2011 Workforce Analysis. No additional documentation of an assessment

of employment practices for any prior years was given nor was there a documented assessment of the data provided during the site visit. While these describe a procedure for completing qualitative and quantitative assessments of employment practices, they do not evidence complete assessments of employment practices for the past three years in accordance with FTA requirements.

Corrective Action and Schedule: Within 120 days, Metro must submit to the FTA Program Analyst in the FTA Headquarters Office of Civil Rights qualitative and quantitative assessments of employment practices (i.e., recruitment, testing, promotions, discipline, terminations, and compensation) for the past three years in accordance with the requirements of FTA C. 4704.1.

8. Monitoring and Reporting System

Requirement: An important part of any successful EEO program is the establishment of an effective and workable internal monitoring and reporting system.

Finding: During this Compliance Review of Metro, deficiencies were found with FTA requirements for a Monitoring and Reporting System. FTA Circular 4704.1, Chapter III, 2.g, states:

An important part of any successful EEO program is the establishment of an effective and workable internal monitoring and reporting system. This system should serve the following basic purposes:

- *Assessing EEO accomplishments*
- *Enabling the agency to evaluate the EEO program during the year and to take necessary corrective actions, as necessary*

- *Identifying those units which have failed to achieve a goal or implement affirmative action*
- *Providing precise and factual database for future projections.*

Metro's AAP provided information about its monitoring and reporting system. Metro was not able to document that the process developed for monitoring and reporting on its EEO program complied with the requirements detailed in FTA C. 4704.1. The monthly reports generated by Metro do not measure EEO accomplishments. As noted in the Designation of Personnel section above, the EEO Officer had been reporting to the Vice President of Human Resources, but there was no documentation of periodically reporting to the President and CEO or the senior management team.

Following the issuance of the Draft Report, on February 17, 2012, Metro submitted the following to address the issue of the lack of a Monitoring and Reporting System:

The EEO Officer has been designated as a direct report to the President. The new organizational alignment provides a direct line of reporting for the EEO Officer to the President. Additionally, the President has established a monthly office meeting schedule for the EEO Officer to report on the status of EEO program issues; program trends and accomplishments will be addressed during these monthly meetings.

Also included in the February 17, 2012, submission was the following information to address periodic reporting of EEO issues to senior management:

EEO Program accomplishment will also be communicated through reports to senior staff and managers and included in articles published in Newsletters and on the Intranet.

The implementation date for these actions was February 2012 and the current status was listed as “Ongoing.” In addition to the information submitted above, the Job Description for the Director Workforce Diversity/EEO indicated the following:

- The position reports directly to the President/CEO
- Meets periodically with the President/CEO; establish communications with managers and supervisors.

While these actions adequately describe the issue of a periodic reporting timeframe, it does not document the content of the monthly reports, or that any reports of EEO accomplishments have been prepared or presented to the CEO or other senior managers.

Corrective Action and Schedule: Within 120 days, Metro must submit to the FTA Program Analyst in the FTA Headquarters Office of Civil Rights documentation of its monitoring and reporting systems for evaluating EEO accomplishments described in FTA C. 4704.1.

Requirements of FTA Circular 4704.1	Site Review Finding	Description of Deficiencies	Corrective Actions	Response Days/ Closed Date
			of the organizational changes to employees, as well as calendar appointments or agendas between the EEO Officer and CEO. This change must occur immediately, not at Metro's proposed implementation date of April 2012.	
5. Utilization Analysis	ND			
6. Goals and Timetables	ND			
7. Assessment of Employment Practices	D	No assessment of employment practices such as testing, discipline, compensation, etc.	Metro must submit to the FTA Office of Civil Rights a qualitative assessments of employment practices (i.e., recruitment, testing, promotions, discipline, terminations, and compensation) for the past three years in accordance with the requirements of FTA C. 4704.1.	120 Days
8. Monitoring and Reporting System	D	<ul style="list-style-type: none"> • EEO monthly reports do not measure EEO accomplishments. • No periodic reporting to senior management. 	Metro must submit to the FTA Office of Civil Rights: <ul style="list-style-type: none"> • Documentation of its monitoring and reporting systems for evaluating as described in FTA C. 4704.1. • Schedule for periodic reporting to senior management. 	Closed 2/17/2012

ND = No Deficiency; D = Deficiency; NA = Not Applicable; NR = Not Reviewed; AC=Advisory Comments

VIII. ATTENDEES

NAME	TITLE/ ORGANIZATION	PHONE	E-MAIL
John Nations	President and CEO	314-982-1588	jmnations@metroslouis.org
Dee Joyce-Hayes	General Counsel	314-982-1532	djoycehayes@metroslouis.org
Melva Pete	Vice President, Human Resources	314-982-1400	mpete@metroslouis.org
Phillip Mosley, Jr.	Director Workforce Diversity/EEO and Acting Manager of Recruitment	314-982-1589	pmsley@metroslouis.org
Candice Lallinger	Compensation Manager	314-982-1400 x1702	clallinger@metroslouis.org
Vernice Kelly	Human Resources Specialist	314-982-1483	vkelly@metroslouis.org
Tracy Beidleman	Director of Program Development and Grants	314-982-1568	tbeidleman@metroslouis.org
Kent Swagler	Director, Corporate Compliance	314-923-3097	kswagler@metroslouis.org
AGENCY – Federal Transit Administration (FTA)			
Anita Heard	Equal Opportunity Specialist, FTA Headquarters	202-493-0318	anita.heard@dot.gov
Shannon Graves	Transportation Program Specialist, FTA Region VII	816-329-3926	shannon.graves@dot.gov
REVIEW TEAM – The DMP Group, LLC			
Maxine Marshall	Lead Reviewer, DMP	202-726-2630	Maxine.marshall@thedmpgroup.com
Gregory Campbell	Reviewer, DMP	202-726-2630	Gregory.campbell@thedmpgroup.com
Khalique Davis	Reviewer, DMP	412-952-9007	Khalique.davis@thedmpgroup.com