



The Equal Employment Opportunity Program  
Of  
Capital Area Transit System

January 1, 2024



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## Introduction

Equal opportunity for all is an American ideal, Equal Employment Opportunity (EEO) in public service is a basic personnel system principle which takes into consideration both applicants and employees based on job-pertinent individual differences and not on the bases of extraneous factors, such as race, color, religion, national origin, sex , age or disability.

The mere passive prohibition of discriminatory practices is not enough to effectuate the principle of equal opportunity. An affirmative action program is needed to achieve this goal. This calls for top level administrative direction, practical plan for specific steps to be taken, vigorous administration at all levels of supervision, and evaluation of operations.

The scope of an affirmative action plan must encompass not only elements of the personnel system but also the related management factors. The development of the plan should include attention to recruitment, selection, appointment, and promotion and other personnel procedures, department and agency functions in relation to job structuring, and training plans to ensure opportunities to improve skills needed at current job levels and to develop potential for promotion.

Capital Area Transit System (CATS) is an equal opportunity employer. As such, CATS will recruit, hire, train, and promote into all job levels the most qualified persons without regard to race, color, religion, national origin, sex, age or disability. All employment decision is based on job related standards and must comply with the principles of equal employment opportunity.

This EEO Program document will provide prior employment information as of June 30, 2023.



Section A.

### **Statement Policy**

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

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

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

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

As CATS' Chief Executive Officer (CEO), I maintain overall responsibility and accountability for CATS' compliance with its EEO Policy and Program. To ensure day-to-day management, including program preparation, monitoring, and complaint investigation, I have appointed CATS' Compliance Manager as CATS's EEO Officer. The EEO Officer will report directly to me and acts with my authority with all levels of management, labor unions, and employees.

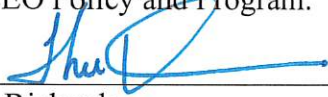
All CATS' executives, management, and supervisory personnel, however, share in the responsibility for implementing and monitoring CATS' EEO Policy and Program within their respective areas and will be assigned specific tasks to ensure compliance is achieved. CATS will evaluate its managers' and supervisors' performance on their successful implementation of



CATS' policies and procedures, in the same way CATS assesses their performance regarding other agency goals.

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

I am personally committed to a workplace that acts upon its daily responsibility to treat all applicants and employees with dignity and respect, as well as equitably under the guidelines of our EEO Policy and Program.

  
\_\_\_\_\_  
Theo Richards  
CATS Interim Chief Executive Officer

1/11/24  
\_\_\_\_\_  
Date



## Section B

### Dissemination of Policy

#### **Internal Dissemination**

CATS will communicate the existence of its EEO policy and program to employees, applicants, and potential applicants by:

- Providing written communication from the CEO
- 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 personnel office.
- Including the EEO policy statement on the agency's website and on its employee portal, in reports and in manuals.
- Meeting with top management official (e.g., bus operations, human resources, finance, etc.) semiannually to discuss the EEO program and its implementation.
- Meeting with all employees and affinity groups to seek input on the program implementation.
- Conducting annual EEO training for employees and for managers. The Human Resources Department will provide an agenda for training and require attendees to sign-in on a sheet showing date and time attended.
- Conducting EEO training for all new supervisors or managers within 90 days of their appointment.
- Providing a copy of the policy to new employees and having them sign a form acknowledging they have read and understand the policy.

#### **External Dissemination**

When there is outreach or advertising to recruitment entities, CATS will disseminate their EEO policy to those entities. All recruitment ads must state that the agency "is an equal employment opportunity employer."



## Section C

### Designation of Responsibility for EEO Program

CATS' EEO Officer's name and contact information will be published on all internal and external communications regarding CATS' EEO Program. This will include publishing the EEO Officer's contact information prominently in both print and electronic communications, such as the agency's website. The EEO Officer will utilize the following e-mail address, [EEO.Officer@brcats.com](mailto:EEO.Officer@brcats.com), in addition to a name-based e-mail address.

### **EEO Officer responsibilities**

The EEO Officer identified in CATS' policy statement is the Compliance Manager. The EEO Officer has direct access to the Chief Executive Officer and has the following qualifications:

- Sensitivity to, and subject-matter expertise of, the varied ways in which discrimination occurs.
- Total commitment to EEO program goals and objectives.
- Knowledge of civil rights laws, policies, rules, regulations and guidelines.
- Sufficient authority and the ability to work and communicate with other (e.g., department heads) to achieve EEO goals and objectives.

### **The EEO Officer shall:**

- Develop the EEO policy statement and a written EEO program.
- Assist management in collecting and analyzing employment data. Identifying problem areas, setting goal and timetables, and developing programs to achieve goals.
- Design, implement, and monitor internal audit and reporting systems to measure program effectiveness and to determine where progress has been made where proactive action is needed.
- Review the agency's non-discrimination plan with all managers and supervisors to ensure that the policy is understood.
- Concur in the hiring and promotion process
- In conjunction with human resources, periodically review employment practices and policies, compliant policies, reasonable accommodations' policies, performance evaluations, grievance procedures and union agreements.



- Report at least semi-annually to the CEO on each department's progress in relation to the agency's goals and on contractor and vendor compliance.
- Serve as liaison between the agency; Federal, state parish, and local governments; regulatory agencies; and community groups representing minorities, women, and persons with disabilities, and others.
- Maintain awareness of current EEO laws and regulations, and ensure the laws and regulations affecting non-discrimination are disseminated to responsible official.
- Investigate complaints of EEO training for employees and managers.
- Ensure CATS provides EEO training for employees and managers.
- In conjunction with human resources, advise employees and applicants of available training programs and professional development opportunities and the entrance requirements.
- Audit posting of the EEO policy statement to ensure compliance information is posted and up to date.

### **CATS' Managers responsibilities**

All CATS' managers will be required to:

- Participate actively in periodic audits of all aspects of employment to identify and remove barriers obstructing the achievement of specified goals and objectives.

### **Human Resources (HR) Director responsibilities**

The HR Director shall maintain the ongoing workforce analysis charts, delineating personnel changes by job category and then by race, national origin, and sex. The HR Director will also work with the EEO Officer in setting up the goals and timetables needed for EEO purposes. The HR Director will continually conduct career counseling and ensure that employees receive adequate training to perform their functions.

### **CATS' organizational chart**

CATS' organizational chart has been inserted as Attachment A.





## Section D

### Utilization Analysis

The chart is inserted as Attachment B.

## Section E

### Goals and Timetables

Capital Area Transit System has experienced a considerable amount of personnel changes within the last four years. Currently the agency is being led by its first female Chief Executive Officer, as well as the first African American.

The agency is committed to maintaining and meeting the EEO goals set forth. CATS' will continue to drive the EEO program by offering ways to recruit and encourage diversity by partnering with local non-profit organizations to upskill the agency through apprenticeships and other local programs.

CATS' will implement a system used to track and identify trends and monitor the success of the program.

CATS' goal is to hire at least one additional person in the areas identified as potential adverse impact areas within the next twenty-four months.

#### Four-fifths adverse impact summary

- Potential adverse impact in Administrative support
- Potential advise impact in Skilled Craft
- Potential adverse impact in Service Maintenance

## Section F

### Assessment of Employment Practices



In analyzing its total employment practices, CATS has not determined any barriers to making it good faith efforts to meet EEO goals. CATS has been very close to achieving these goals and has made strides to improve its efforts. It is CATS' policy to make all employment decision without bias or discrimination.

CATS is committed to diversity and continues to set and review EEO goals and expectations. Minorities and woman have not been excluded from any CATS' sponsored activities and programs and such programs are fully integrated.

### Overview of CATS' Employment Practices

CATS' HR Department is responsible for filling all vacant positions at the transit system.

Employment advertisement is placed on CATS website, posted throughout the facilities and on various other online websites.

All employment ads clearly state that CATS is an Equal Opportunity Employer.

Applicant screening and selection is carried out under the director of the HR Director. CATS hire the most qualified candidate, whether internal or external. The HR Director works with the department head to select the pool of qualified candidates.

Newly hired employees are trained in accordance with the needs of the position being filled.

All disciplinary actions are reviewed by the HR department. Disciplinary actions are maintained in the employee's personnel file.

### **Future Recruiting Efforts**

Emphasis will be given to seeking and encouraging qualified women and men, minority, and disabled applicants to apply at CATS. Job announcements will be given to minority organizations, women's organizations, minority representatives at the State of Louisiana Division, and to the State of Louisiana Department of Vocational Rehabilitation.

CATS' employment application form will be in conformance with the law. When job announcements are advertised, they will include a statement that CATS is an Equal Employment Opportunity Employer.



Conviction information will not automatically preclude the possibility of employment with CATS, but rather is considered only as the type of offense may be related to job requirements.

CATS will partner with local organizations (e.g. second chance programs) to provide individuals with a opportunity to be successful and productive citizens.

Race, color, religion, sex, age, national origin, or disabilities are not factors in determining qualifications.

CATS' 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.

CATS' department heads, directors, and managers will assist in identifying problem areas, being actively involved with underrepresented community groups, participating in employment audits, and making sure the agency's policies and procedures are followed. Department heads, directors, and managers will also review employee qualifications, participate in the review and/or investigation of complaints, and conduct career counseling.

The HR Director and EEO Officer will evaluate on semi-annual basis CATS' progress towards the established goals. The EEO officer will inform the rest of the leadership team, including the Chief Executive Officer, on the progression of the agency.

## **Section G**

### **Monitoring and Reporting System**

Based upon the performance objectives and performance standards of this plan, the EEO Officer shall monitor Capital Area Transit System's performance relative to hiring and training. A semi-annual report shall be prepared for the CEO on the status of the EEO program.

CATS' HR Department will regularly keep the EEO Officer informed on hires, promotions, disciplinary actions, terminations, suspensions, demotions, etc. with a breakdown on race, color, national origin, disability, sex, etc.

CATS' EEO Officer will track complaints based on race, color, national origin, sex, religion, age, and disability. The EEO Officer will discuss and resolve these complaints with the appropriate management staff, and the CEO.



## **Section H**

### **Discrimination Complaint Processing**

All employees shall be free from any or all restraint, interference, coercion, or reprisal on the part of their associates, supervisors and department heads in making any complaint or appeal in serving as representatives of an appellant, in appearing as witnesses or in seeking information. The above principles apply with equal force after a complaint has been adjudicated. Should these principles be violated, the facts shall be brought to the attention of CATS by the appellant, his representative or the person affected so that appropriate action may be taken.

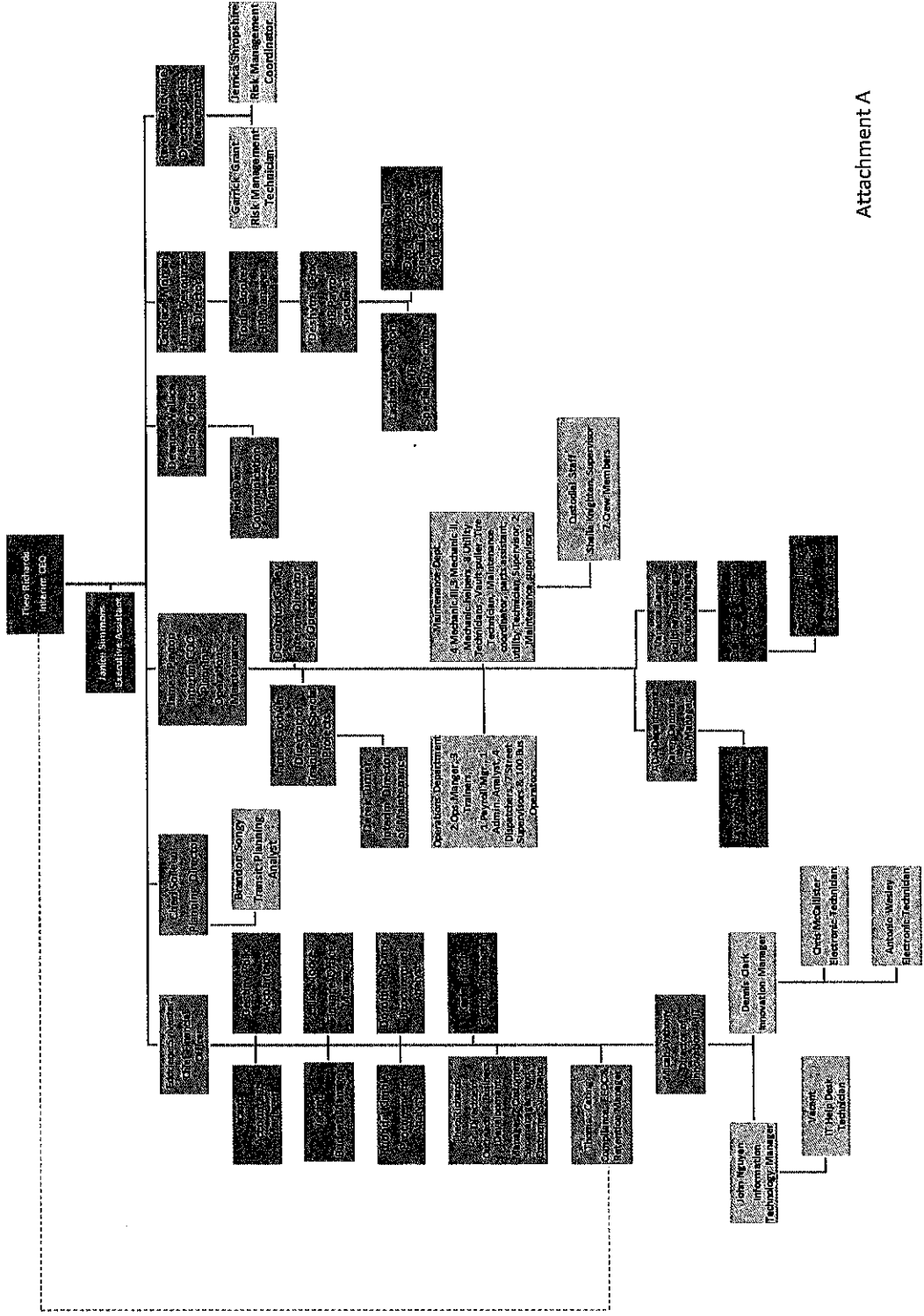
Informal complaints shall be adjudicated generally at the department manager level. When an informal complaint is received by a manager, the manager shall advise the complainant of the proper grievance and appeals process to be followed and ensure that the complainant has a full understanding of the process. The manager will attempt to settle the grievant complaint within the department.

If no resolution can be formulated at this level, a written grievant complaint should be filled out within 180 calendar day of the alleged discriminatory act giving rise to the complaint and forwarded to the EEO Officer for complaint processing.

The EEO Officer shall ensure a prompt investigation of each written complaint filed with his office is executed and documented. The EEO Officer has 45 days to complete the investigation and respond to the complaint. The EEO Officer will investigate the complaint and make a determination on the action to be taken. If the EEO Officer determines that a discriminatory act has not occurred, they may dismiss the charge with a written letter to the complainant. If, after an investigation of the complaint, the EEO Officer has found that an act of discrimination has occurred, the EEO Officer will recommend CATS take immediate action to remedy the situation. Any employee who is found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

Within five (5) working days of notification of the decision made by the EEO Officer, the complainant may request, in writing, a formal appeal to the Chief Executive Officer (CEO) for a final judgment. The discrimination appeal processing shall be subject to the approval of and/or subsequent modification by the CEO.

Retaliation against applicants and employees who file 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.



Attachment A

**U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION (EEOC)  
2022 EMPLOYER INFORMATION REPORT (EEO-1 COMPONENT 1)**

**EEOC Standard Form 100 (SF 100)**  
Revised 08/2023  
OMB Control Number: 3046-0049  
Expiration Date: 08/31/2024

**SECTION A – TYPE OF REPORT**  
SINGLE ESTABLISHMENT REPORT

**SECTION B – EMPLOYER IDENTIFICATION**

OFS COMPANY ID  
NP12454

EMPLOYER NAME  
Capital Area Transit System

ADDRESS  
2250 Florida Blvd

CITY/TOWN  
BATON ROUGE

STATE  
LA

ZIP CODE  
70802

**SECTION C – HEADQUARTERS OR ESTABLISHMENT-LEVEL IDENTIFICATION (if applicable)**

HQ/ESTABLISHMENT-LEVEL UNIT ID

HEADQUARTERS OR ESTABLISHMENT-LEVEL NAME

HEADQUARTERS OR ESTABLISHMENT-LEVEL ADDRESS

CITY/TOWN

STATE

ZIP CODE

**SECTION D – EMPLOYER IDENTIFICATION NUMBER (EIN)**  
720755868

**SECTION E – EMPLOYER FILING ELIGIBILITY**

YES (Employer Is Eligible to File)  NO (Employer Is Not Eligible to File)  EMPLOYER NO LONGER IN BUSINESS

**SECTION F – FEDERAL CONTRACTOR DESIGNATION (if applicable)**

Unique Entity ID (UEI): 6106

YES (Single-Establishment Employer is Federal Contractor)  YES (Multi-Establishment Employer is Federal Contractor)  
 YES (Headquarters is Federal Contractor)  YES (Non-Headquarters Establishment is Federal Contractor)  
 YES (One or More Non-Headquarters Establishments is Federal Contractor)

**SECTION G – NAICS INFORMATION**

485113 - Bus and Other Motor Vehicle Transit Systems

**SECTION H – WORKFORCE DEMOGRAPHIC DATA**

| JOB CATEGORIES                                | Race/Ethnicity     |        |                        |                           |       |   |                                  |                   |       |                           |       |   |                                  |                   | Row Total |
|---|--------------------|--------|------------------------|---------------------------|-------|---|----------------------------------|-------------------|-------|---------------------------|-------|---|----------------------------------|-------------------|-----------|
|   | Hispanic or Latino |        | Not Hispanic or Latino |                           |       |   |                                  |                   |       |                           |       |   |                                  |                   |           |
|   |                    |        | Male                   |                           |       |   |                                  |                   |       | Female                    |       |   |                                  |                   |           |
|   | Male               | Female | White                  | Black or African American | Asian | Native Hawaiian or Other Pacific Islander | American Indian or Alaska Native | Two or More Races | White | Black or African American | Asian | Native Hawaiian or Other Pacific Islander | American Indian or Alaska Native | Two or More Races |           |
| Executive/Senior Level Officials and Managers | 0                  | 0      | 0                      | 0                         | 0     | 0   | 0                                | 0                 | 0     | 2                         | 0     | 0   | 0                                | 0                 | 2         |
| First/Mid-Level Officials and Managers        | 0                  | 0      | 4                      | 2                         | 0     | 0   | 0                                | 1                 | 0     | 6                         | 0     | 0   | 0                                | 0                 | 13        |
| Professionals                                 | 0                  | 0      | 0                      | 5                         | 0     | 0   | 0                                | 0                 | 4     | 12                        | 3     | 0   | 0                                | 0                 | 24        |
| Technicians                                   | 0                  | 0      | 0                      | 4                         | 0     | 0   | 0                                | 0                 | 0     | 0                         | 0     | 0   | 0                                | 0                 | 4         |
| Sales Workers                                 | 0                  | 0      | 0                      | 1                         | 0     | 0   | 0                                | 0                 | 0     | 0                         | 0     | 0   | 0                                | 0                 | 1         |
| Administrative Support Workers                | 0                  | 0      | 1                      | 2                         | 0     | 0   | 0                                | 0                 | 0     | 16                        | 0     | 0   | 0                                | 0                 | 19        |
| Craft Workers                                 | 0                  | 0      | 3                      | 2                         | 0     | 0   | 0                                | 0                 | 0     | 0                         | 0     | 0   | 0                                | 0                 | 5         |
| Operatives                                    | 0                  | 0      | 0                      | 28                        | 0     | 0   | 0                                | 0                 | 1     | 80                        | 0     | 0   | 0                                | 0                 | 109       |
| Laborers and Helpers                          | 0                  | 0      | 2                      | 33                        | 0     | 0   | 0                                | 0                 | 0     | 10                        | 0     | 0   | 0                                | 0                 | 45        |
| Service Workers                               | 0                  | 0      | 0                      | 0                         | 0     | 0   | 0                                | 0                 | 0     | 0                         | 0     | 0   | 0                                | 0                 | 0         |
| <b>CURRENT 2022 REPORTING YEAR TOTAL</b>      | 0                  | 0      | 10                     | 77                        | 0     | 0   | 0                                | 1                 | 5     | 126                       | 3     | 0   | 0                                | 0                 | 222       |
| <b>PRIOR 2021 REPORTING YEAR TOTAL</b>        | 0                  | 0      | 0                      | 0                         | 0     | 0   | 0                                | 0                 | 0     | 0                         | 0     | 0   | 0                                | 0                 | 0         |

**SECTION I – WORKFORCE SNAPSHOT PERIOD**  
12/15/2022 - 12/31/2022

**SECTION J – HEADQUARTERS OR ESTABLISHMENT-LEVEL COMMENTS (optional)**

Not Applicable

**U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION (EEOC)  
2022 EMPLOYER INFORMATION REPORT (EEO-1 COMPONENT 1)**

**EEOC Standard Form 100 (SF 100)**  
Revised 08/2023  
OMB Control Number: 3046-0049  
Expiration Date: 08/31/2024

**SECTION K – OFFICIAL CERTIFICATION OF SUBMISSION**

**EMPLOYER IDENTIFICATION**

OFS COMPANY ID  
NP12454

EMPLOYER NAME  
Capital Area Transit System

ADDRESS  
2250 Florida Blvd

CITY/TOWN  
BATON ROUGE

STATE  
LA

ZIP CODE  
70802

**CERTIFICATION COMMENTS (optional)**

This is our first submittal I have completed and the EEO Officer for CATS.

**CERTIFICATION STATEMENT**

*"I certify that the information, including any workforce demographic data, provided in this report is correct and true to the best of my knowledge and was prepared in conformity with the directions set forth in the form and accompanying instructions."*  
**Knowingly and willfully false statements on this report are punishable by law, US Code, Title 18, Section 1001.**

**DATE OF CERTIFICATION**

**1/9/2024 3:22 PM [EST]**

**EMPLOYER'S CERTIFYING OFFICIAL**

Name of Employer's Certifying Official

Thomas Cating

Title of Certifying Official

Compliance Manager

Email Address of Certifying Official

tcating@brcats.com

Telephone Number of Certifying Official

832-457-4792

**PRIMARY POINT OF CONTACT (POC) FOR EEO-1 COMPONENT 1 REPORTING**

Name of Primary POC

Thomas Cating

Title and Employer of Primary POC

Compliance Manager

Thomas Cating

Email Address of Primary POC

tcating@brcats.com

Telephone Number of Primary POC

832-457-4792