



THE METROPOLITAN DISTRICT

AFFIRMATIVE ACTION PLAN

AS OF JANUARY 1, 2008

DISTRICT BOARD APPROVED

October 6, 2008

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SECTION I

A. EXECUTIVE SUMMARY

A comprehensive analysis has been conducted for the District's 2007 Affirmative Plan. As of January 1, 2008 the Affirmative Action Plan covers 601 employees including 147 minorities (24.4) and 93 females (15.7). This is an increase of 8 minorities and 9 females from the filing of this past year.

This review of the plan has resulted in the up-date of all of the statistical data, including establishing new placement goals based on the past year's goal attainment.

All sections of the plan were reviewed with special emphasis on the Identification of Problem Areas, Development and Implementation of Action Oriented Goals and the Internal Audit. Any updates of sections have been made in the body of the plan.

While a review of Employment Processes, Compensation Systems, and Personnel Procedures reveals no impediments to equal employment opportunity; no race, gender or ethnicity-based disparities in pay practices, rates of pay, and promotional opportunities, The District has developed and will continue to develop action-oriented programs to attain established goals and objectives. These are additional good faith efforts to expand employment opportunities and produce measurable results.

Additionally, through direction from the Chief Executive Officer, the following action-oriented goals shall be conducted regularly. They are:

At the end of every quarter, each Chief (CAO, COO, CFO, and Chief of Program Management) will receive a report submitted by their Managers summarizing their efforts towards EEO goals and compliance with the Affirmative Action Plan. Each Chief shall submit a consolidated report to the CEO and Diversity Officer describing these efforts, activities and results.

The Diversity Officer will report at the monthly meetings of the Sub-Committee on Diversity. This report will include program effectiveness and interim goal achievement status. This report will disclose unsatisfactory performance against goals and provided recommended actions where mitigation is required.

HR Officers will receive annual training to ensure that they are employing the latest contemporary strategy and continue to keep the employment process free from bias.

The District will continue to provided career counseling and training for employees interested in advancing career opportunities within the District.

The Metropolitan District Commission is fully committed to the concept and practice of equal opportunity and affirmative action in all aspects of employment.

In developing and implementing the Affirmative Action Plan (AAP), the District has been guided by its established policy of providing equal employment opportunity. Any placement goals that have been established herein are not intended as rigid, inflexible quotas that must be met, but rather as targets reasonably attainable by applying every good faith effort in implementing this AAP. The use of placement goals in this AAP is not intended, nor is the effect of such placement goals intended, to discriminate against an individual or group of individuals with respect to any employment opportunities for which he, she, or they are qualified on the grounds that he, she, or they are not the beneficiaries of affirmative action themselves. Nothing herein is intended to sanction the discriminatory treatment of any person. Indeed, all employment decisions are made based on job-related criteria. Thus, this AAP has been developed in reliance upon the Guidelines on Affirmative Action issued by the Equal Employment Opportunity Commission (EEOC).

An analysis of the District's accomplishments follows this Executive Summary.

B. ACCOMPLISHMENTS

The District was able to achieve many hiring goals and action-oriented program goals during the 2007 plan period.

1. HIRING GOALS

The following hiring goals were met:

One of two (50%) minority goals in the Officials/Administrators category.

Four of ten (40%) female goals in the Professionals category.

Two of two (100%) female goals in the Skilled Craft category.

It is also commendable that the District hired thirteen (13) Females and thirteen (13) Minorities out of 36 total hires.

2. ACTION-ORIENTED PROGRAM GOALS

The following Action-Oriented Program goals were met.

a. Goal

The District will continue its recruitment efforts through expanding the employment services that are available on the Internet.

Progress

The MDC has enhanced its recruitment services with Careerbuilder. This new agreement will include 40 job postings on the Careerbuilder website where the MDC website and logo will be directly accessible through a Brandbuilder page. There will be a one year access to the Careerbuilder Resume Database to search resumes nationwide for all job categories. Jobs which are posted on Careerbuilder will be distributed to their Partner's websites. This recruitment strategy will result in a cost savings of \$4,300.00 annually. The District will continue to advertise all postings in the Hartford Courant and other publications as necessary.

b. Goal

The District will analyze all applicant flow data both for hires and promotions to determine if the recruitment outreach is reaching both qualified women and minorities.

Progress

The MDC will be integrating an applicant tracking software (*iApplicants*) which will be accessible through the District's website. *iApplicants* will allow both internal and external applicants the opportunity to apply to any job posting electronically from any location by creating a personal account and submitting their application and/or resume. The data provided by all applicants will be downloadable and utilized for reporting purposes as part of the Affirmative Action Plan. Once the program has been implemented onto the website, training will be scheduled for all employees.

c. Goal

The District will continue to monitor the dismissals, transfers out and resignations in order to determine that there is no disparate treatment.

Progress

Regular meetings between the Human Resource Director, Manager of Labor Relations, the Diversity Officer and the Training Coordinator are held to analyze these personnel transactions.

d. Goal

The District will periodically review job descriptions to determine if any can be reclassified to trainee positions or to establish trainee positions to allow for more diverse applicants and future upward career mobility opportunities.

Progress

The District hired two female POITs in Solid Waste and WPC as trainee positions. Training is also being offered to Inspectors so that they will be qualified for Technician positions, if available.

e. Goal

The summer internship program that is funded by the Human Resource Diversity Budget and includes all variety of positions will continue to be developed for more opportunities.

Progress

The Summer Intern Placements were as follows: Finance, PMU, HR, EH&S, IT, Water Treatment and Supply, and GIS. 2 Females, 4 Black Males, 1 Asian Pacific Islander, 1 Special Needs Male.

Five of the Interns will be returning during their winter break to continue working in PMU, IT, WT&S, Finance, and EH&S.

f. Goal

Every potential hire and promotion will be reviewed by the Diversity Officer, prior to a final decision being made by the appropriate official.

Progress

With the hiring of a full-time Diversity Officer this goal has been accomplished, as all personnel activities are now reviewed.

NOTE:

It is commendable that the District has made such good faith efforts to achieve many of the numerical hiring goals and all but one of the Action-Oriented Program goals. New goals for the year 2008 are outlined in Section XI – Development and Implementation of Action-Oriented Programs.

**POLICY STATEMENT:
AFFIRMATIVE ACTION AND EQUAL EMPLOYMENT OPPORTUNITY**

In issuing the Metropolitan District's Affirmative Action Policy, I reiterate my personal commitment to and the need for Affirmative Action and attest to The District's determination to identify strengths and weaknesses in our employment system, resolve problems when they appear, recruit employees vigorously, and retain current employees while helping them prepare for advancement.

The Metropolitan District is an equal employment opportunity/affirmative action employer. In order to ensure that employees and job applicants are not subjected to unlawful discrimination, it is The District's policy to comply with all laws and regulations that both prohibit employment discrimination and mandate specific actions for the purpose of eliminating the present effects of past discrimination. Equal employment opportunity is the purpose and goal of affirmative action. The District has established equal employment opportunity and affirmative action as immediate and necessary objectives because we are committed to its concepts, principles and goals.

Equal employment opportunity (EEO) means nondiscrimination – this is, hiring and promoting without regard to race, color, ethnicity, religion, age, sex, marital status, national origin, ancestry, sexual orientation, genetic information, physical or mental disabilities (including learning disabilities, mental deficiencies, past/present history of a mental disorder), prior conviction of a crime, or other factors which cannot be lawfully be the basis for employment actions, unless there is a bona fide occupational qualification. Affirmative action plans and programs are designed to achieve the full and fair participation for all individuals, including upward mobility.

Affirmative action is necessary throughout the employment process, from the posting of job notices through hiring, to the termination of employment. We also seek to encourage the entry of members of underrepresented groups into the workforce, and to support their mobility once they are hired.

All services and programs are to be provided in a fair and impartial manner. These activities must reflect the positive, active spirit of this policy. All directors and managers are expected to support The District's Affirmative Action Plan and Equal Employment Opportunity Policy. All directors and managers must be fully acquainted with The District's Plan and Policy, assure that their subordinate managers are aware of their obligations, and make their support observable and meaningful. This policy also mandates that employees at every level shall support and respect the advancement of equal employment principals and our workplace community. Affirmative action and equal employment opportunity are District-wide priorities, and will remain so until our goals are met for all employees.

Questions or complaints may be forwarded to the Human Resource Department at Ext. 3312, or submitted in writing to Doris Poma, Diversity Officer, The Metropolitan District, 555 Main Street, CT 06142-0800.

Charles P. Sheehan
Chief Executive Officer

Date

SECTION III

DISSEMINATION OF POLICY

The District has put itself on public record as an affirmative action/equal opportunity employer. The Policy Statement is distributed annually.

A. Internal Dissemination

The District will continue to make its equal employment opportunity policy known internally by:

1. Posting the policy statement at all of The District's locations.
2. Including the policy in The District's employee handbook.
3. Explaining the policy thoroughly in the Employee Orientation Program for new employee hires.
4. Conducting periodic meetings with The District Board and executive, management, and supervisory personnel to explain the intent of the policy, the Chief Executive Officer's commitment, and individual responsibilities for effective implementation.
5. Publicizing the policy on The District's website and Intranet and in the annual report.
6. Publishing in The District's publications articles covering EEO events, promotions of women and minorities, and special action programs.
7. Picturing both minority and non-minority men and women in publications in which employees are featured.
8. Conducting periodic meetings with non-supervisory employees to discuss the policy.
9. Making current employees aware of the existence of the Affirmative Action Program and the resources available to them.
10. Meeting with union officials to discuss the policy and to request their cooperation.
11. Including non-discrimination language and/or clause in all union agreements.

B. External Dissemination

The District makes its policy known externally by:

1. Incorporating the equal employment opportunity policy language in all purchase orders, leases, and contracts.
2. Informing all recruiting sources in writing of The District's policy, requesting that the sources actively recruit and refer women and minorities for all positions for which they refer applicants.
3. Notifying, in writing, community agencies, community leaders, minority and women's organizations, secondary schools, and colleges of The District's policy.
4. Showing both minority and non-minority men and women when employees are pictured in help wanted or other advertising.
5. Informing prospective employees through the Equal Opportunity Information Sheet included with each application packet.
6. Sending written notification of The District's commitment to all contractors, subcontractors, vendors, and suppliers.

SECTION IV

RESPONSIBILITY FOR IMPLEMENTATION

Charles P. Sheehan, Chief Executive Officer, has the overall responsibility for implementation of the Equal Employment Opportunity Policy and the Affirmative Action Plan (AAP). The District has assigned primary management responsibility and accountability for ensuring full compliance with the plan to the Diversity Officer of The District. The Diversity Officer has the resources, support of, and access to top management necessary to ensure the effective implementation of the AAP. The Chief Executive Officer actively supports the program and provides assistance whenever it is needed, making managers and supervisors aware of the program and requesting their cooperation and assistance. The name of the Diversity Officer appears on internal and external communications on The District's Equal Employment Opportunity Policy and AAP.

1. Responsibilities and Duties of the Diversity Officer:

- A. To continually develop Affirmative Action policies as and procedures as needed to ensure an efficient yet positive affirmative action program for The District.
- B. Assisting in the identification of problem areas in concert with Human Resources, and developing strategies to eliminate any problems identified.
- C. Assisting line management and supervisors in devising solutions to equal employment problems, including counseling and training, to ensure full understanding of affirmative action and EEO policies and procedures.
- D. Designing and implementing monitoring and reporting methods that will:
 - Measure the effectiveness of The District's equal employment and AAP.
 - Indicate any need for remedial action.
 - Determine the degree to which The District's placement goals and objectives are being attained.
 - Provide the management with an understanding of The District's AAP placement goals and objectives.
- E. Meet with managers, supervisors, and employees to assure that The District's EEO policies are being followed.

- F. Ensuring that managers and supervisors understand that their work performance is being evaluated in part on the basis of their demonstrated commitment to equal employment opportunity, and that it is their responsibility to prevent all types of unlawful workplace harassment.
- G. Serve as advisor to the Affirmative Action Advisory Committee.
- H. Serve as a liaison between the Commission and appropriate minority and women's organizations, and community action groups concerned with employment opportunities of minorities and women.
 - Make contact with predominately female and minority high schools, colleges, and technical schools in the area as needed.
 - Keep management informed of developments in the equal employment opportunity and affirmative action area.
 - Conduct periodic audits to ensure that all EEO posters are properly displayed.
 - Ensure that all employees are afforded the opportunity and are encouraged to participate in all sponsored educational, training recreation and social activities.
- I. Investigate all complaints of alleged discrimination

2. Responsibility of Managers and Supervisors

The District recognizes that the cooperation of department managers and supervisors is required to reach the full potential of this AAP. Therefore, managers and supervisors are expected to:

- Assist the Diversity Officer in the identification of any problem areas and help to eliminate any barriers to equal employment opportunity.
- Whenever possible, become involved in local minority organizations, women's organizations, community action groups, and community service programs.
- Work with the Diversity Officer to periodically review hiring and promotion patterns and training programs to isolate impediments to the attainment of affirmative action placement goals and objectives. Results from these reviews are communicated through appropriate management meetings.

- Review the qualifications of employees to ensure that minorities and women are given full opportunity for transfers and promotions.
- Provide career counseling for employees as needed.
- Adhere to The District's policy of equal employment opportunity for all employees and ensure that the policy is understood, supported and adhered to by the employees they supervise.
- Take action to prevent the harassment of employees based on protected characteristics or due to a perception that an individual might have been the beneficiary of The District's affirmative action efforts.

SECTION V

JOB GROUP ANALYSIS

As the first diagnostic component of the Affirmative Action Plan (AAP), a job group (workforce) analysis has been conducted. The job group analysis compares the representation of minorities and women in the workforce covered by this AAP with the estimate of the available qualified minorities and women who could be employed by The District in positions covered by this AAP.

In designing the job groups, the following elements were considered:

- Similarity of duties and responsibilities;
- Similarity of compensation; and
- Similarity of opportunities for advancement including training, transfers, promotions, mobility and other career enhancements.

LINES OF PROGRESSION

It should be noted that there are no formal lines of progression for positions in this Plan. To the extent that there is a usual promotional sequence, it is taken into account in establishing feeder Job Groups in the Availability Analysis. A feeder Job Group is one from which an employee could be promoted, transferred or trained into another job group being analyzed for internal availability data.

INDIVIDUAL JOB GROUPS

Category 1 (Job Group A) - Officials and Managers: Occupations requiring administrative and managerial personnel who set broad policies, exercise overall responsibility for execution of these policies, and direct individual departments or special areas of operation. There are presently 28 employees in this job group.

Category 2 (Job Group B) - Professionals: Occupations requiring either college graduation or experience of such kind and amount as to provide a comparable background. There are presently 77 employees in this job group.

Category 3 (Job Group C) - Technicians: Occupations requiring a combination of basic scientific knowledge and manual skill that can be obtained through post high school education, such as offered in many technical institutes and junior colleges or through equivalent on the job training. There are presently 70 employees in this job group.

Category 4 (Job Group D) - Protective Services: These positions require specialized police training and experience. There are presently 7 employees in this job group.

Category 5 (Job Group E) – Paraprofessional: These positions can be utilized as Upward Mobility into higher levels, i.e.: Professional. There are presently 3 employees in this job group.

Category 6 (Job Group F) - Administrative Support: Positions that support administrative functions and includes all clerical-type work regardless of level of difficulty. There are presently 56 employees in this job group.

Category 7 (Job Group G) - Skilled Crafts: Manual workers of relatively high skill level having a thorough and comprehensive knowledge of the process involved in their work. There are presently 322 employees in this job group.

Category 8 (Job Group H) - Service Maintenance: Perform duties that result in or contribute to the comfort, convenience and hygiene of personnel and to the upkeep and care of buildings, facilities or grounds. This job group also includes truck drivers. There are presently 38 employees in this job group.

The following charts identify the job groups created for this AAP, the job titles that comprise each job group, and the percentage of incumbents in each job group.

SECTION VI

ORGANIZATIONAL PROFILE

As the second diagnostic component of the District's AAP and to conform to applicable regulations, The District has completed a profile of the total workforce by Cost Center and Department. The organizational profile is an overview of the staffing patterns at The District and is used to determine whether there are areas in the workforce where minorities or women are underrepresented or concentrated.

The following charts set forth the Job Group Analysis (workforce) by Cost Centers. The analysis identifies all job titles within each department. For each job title, the following data is provided: total number of incumbents, total number of male and female incumbents, and total number of male and female incumbents in each of the following racial/ethnic groups: White, Black, Hispanic, Asian/Pacific Islander, and American Indian/Alaskan Native (Grouped under Other).

SECTION VII

AVAILABILITY ANALYSIS

The availability analysis is a part of the Incumbency vs. Estimated Availability Analysis - the final diagnostic component of this AAP. The purpose of the availability analysis is to establish a benchmark against which the demographic composition of The District's workforce may be compared to determine whether barriers to equal employment opportunity may exist within particular job groups.

Pursuant to applicable regulations, the availability analysis for each job group examines two potential areas of availability: individuals with the requisite skills outside the establishment (external availability) and those within the establishment who are promotable, transferable and/or trainable (internal availability). In determining availability, we have selected our reasonable recruitment area and our pool of promotable, transferable, and trainable employees in such a way as not to exclude qualified minorities and women. Moreover, when determining external availability, we have used as our source of data the most current and discrete statistical information available. For this availability analysis, the 2000 census data have been utilized.

Finally, where a job group is composed of different job titles that carry different availability rates, we calculated a composite availability figure. We arrived at the composite availability figure by determining the proportion of the job group incumbents employed in each job title, weighting the availability for each job title by the proportion of incumbents employed in that title, and adding together the weighted availability estimates.

A brief written rationale for the selection of the recruitment areas and internal pools by job group follows:

A – OFFICIALS AND ADMINISTRATORS

Factor 1: *United States, 80% Top Executives*. This is the geographical area from which The District usually seeks or reasonably would seek workers to fill positions in job group EEO 1. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computation 20%*. This pool of feeder positions EEO 2 Professionals was chosen based on reasonable paths of progression within The District and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

B – PROFESSIONALS

Factor 1: *United States, 80% Professional & Related Occupations*. This is the geographical area from which The District usually seeks or reasonably would seek workers to fill positions in job group EEO 2. This area was chosen based on current

practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computation 20%*. This pool of feeder positions EEO 3 Technicians was chosen based on reasonable paths of progression within The District and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

C – TECHNICIANS

Factor 1: *Hartford County, 40% Engineer Technicians, Exclud. Drafters*. This is the geographical area from which The District usually seeks or reasonably would seek workers to fill positions in job group EEO 3. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computation 60%*. This pool of feeder positions EEO 7 Skilled Craft was chosen based on reasonable paths of progression within The District and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

D – PROTECTIVE SERVICES

Factor 1: *Connecticut Statewide, 100% Police Officers*. This is the geographical area from which the organization always seeks workers to fill positions in this category. All of these positions require specialized training in law enforcement.

Factor 2: There are no feeder positions for Job Group D.

E – PARAPROFESSIONAL

Factor 1: *Hartford County, 10% Financial Clerks*. This is the geographical area from which The District usually seeks to fill positions in this EEO 5 Job Group.

Factor 2: *Feeder Job Computation 90%*. This pool of feeder positions is EEO 6 Administrative Support and can be utilized as an upward mobility tool for The District.

F – ADMINISTRATIVE SUPPORT

Factor 1: *Hartford County, 70% Other Office and Administrative Support Workers*. This is the geographical area from which The District usually seeks or reasonably would seek workers to fill positions in job group 5 – Administrative Support. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computation 30%*. This pool of feeder positions is EEO 7 Skilled Craft.

G – SKILLED CRAFT

Factor 1: *Hartford County, 30% Water Liquid Treatment Plant Waste Operators and Water Transportation Workers*. This is the geographical area from which The District usually seeks or reasonably would seek workers to fill positions in Job Group EEO 7 Skilled Craft. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computation 70%*. This pool of feeder positions is from EEO 8 Service/Maintenance

H – SERVICE/MAINTENANCE

Factor 1: *Hartford County, 40% Ground Maintenance Workers* . This is the geographical area from which The District usually seeks or reasonably would seek workers to fill positions in Job Group EEO 8. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2: *Feeder Job Computation 60%*. The pool of feeder positions is from EEO 7 Skilled Craft.

SECTION VIII

COMPARISON OF INCUMBENCY VS. ESTIMATED AVAILABILITY

The District has compared the representation of minorities and women in each job group with their representation among those identified in the availability analysis as available for employment in the job group. Where actual representation was less than the calculated availability, the Company conducted a statistical test to determine whether the difference was greater than could reasonably be expected. Where the job group was of a sufficient size to analyze using the two standard deviation test, The District applied that methodology. Where the use of the two standard deviation test was not appropriate, The District used the exact binomial methodology.

The 80% rule of thumb was followed in declaring underutilization and establishing goals when the actual employment of minorities or females is less than 80% of their availability. That is, if the female/minority incumbency percent (%) is less than the female/minority availability percent (%) and the ratio of incumbency to availability is less than 80%, a placement goal should be established.

For example, if female incumbency is 22% and the availability is estimated to be 24%, then the ratio of female incumbency to availability is $(22\%) / (24\%) = 91.66\%$ and establishing a goal is NOT necessary.

In another example, if minority incumbency is 40% and availability is estimated at 23%, setting a goal is not necessary since the incumbency is greater than the availability.

Lastly, if minority incumbency is 7% and availability is estimated at 15%, since 7% is less than 15%, the ratio is calculated: $(7\%) / (15\%) = 46.66\%$.

This ratio is less than 80%, so a goal should be established.

The comparison of incumbency versus the actual availability is displayed in the following charts.

SECTION IX

PLACEMENT GOALS

The District has established placement goals where the actual representation of women or minorities in a job group is less than would be reasonably expected based on calculated availability.

In establishing placement goals, the following principles were applied:

1. When the percentage of minorities or women employed in a particular job group is less than would reasonably be expected given their availability percentage in that job group, The District established a percentage annual placement goal at least equal to the availability figure derived for women or minorities, as appropriate, for that job group.
2. Placement goals are not quotas that must be met, nor are they to be considered as either a ceiling or a floor for the employment of particular groups.
3. In all employment decisions, The District makes selections in a nondiscriminatory manner. Placement goals do not provide a justification to extend a preference to any individual, select an individual, or adversely affect an individual's employment status, on the basis of that individual's race, color, religion, sex, age, disability, veteran status, or national origin.
4. Placement goals do not create set-asides for specific groups, nor are they intended to achieve proportional representation or equal results.
5. Placement goals are not used to supersede merit selection principles, nor do these placement goals require The District to hire a person who lacks qualifications to perform the job successfully or hire a less-qualified person in preference to a more-qualified one.

As a result of the availability analysis, the new placement goals for the 2008 plan are as follows:

EEO 1 Officials/Administrators	2 Minorities
EEO 2 Professionals	12 Females
EEO 3 Technicians	4 Minorities
EEO 4 Protective Services	1 Minority
EEO 7 Skilled Craft	2 Females
EEO 8 Service/Maintenance	1 Female

SECTION X

IDENTIFICATION OF PROBLEM AREAS

AREAS OF FOCUS:

A. EMPLOYMENT PROCESS

The District continuously reviews and evaluates employment processes and practices to address and eliminate any impediments to equal employment opportunity.

1. Applicant Flow/Data

Applicant is defined as someone who has applied to fill a vacant position with The District from either outside of the organization, or a District employee who has submitted an application for an advertised and/or posted position. At the present time, unsolicited resumes and/or applications may be submitted to the Human Resources Department. It is difficult to keep accurate records of minority and/or gender data on resumes and applications received from external candidates, if the applicant has not completed and submitted the voluntary Equal Opportunity Information Sheet, which is included in The District's Application Material. (Copy of form is included in the exhibits at the end of the plan).

Applicants of identifiable race, ethnicity, and sex are those who: 1) voluntarily complete the Equal Opportunity Information Sheet; 2) are visually identified during interview; or 3) are current employees. Equal Opportunity Information Records are developed and maintained for each recruitment process. At the conclusion of each recruitment process, an analysis of the applicant pool is conducted. Information related to race, sex, ethnic group and recruiting source(s) is reviewed and evaluated.

2. Hires, Promotions and Other Personnel Actions

To be considered for any employment opportunity, both internal and external applicants must make timely submission expressing interest in the stated opportunity in the application form that is required. The District will post vacant bargaining unit positions in accordance with collective bargaining unit provisions. Wherever possible, vacant positions will be advertised both externally and internally. When applications are required, they must be completed and signed or they will not be considered.

Most of The District positions are governed by collective bargaining agreements. In fact, the agreement covering Local 184, the largest bargaining unit, which represents all protective service, skilled craft and service-maintenance workers, contains a Rule of One for all promotions and transfers. Applicants who bid on jobs in this bargaining unit are awarded points for experience, education and seniority. A provision has been negotiated

with Local 184 to award additional minority points to candidates with less than 10 years of service. The highest ranking candidate is awarded the job. In cases where there are ten points or less between the number 1 and number 2 candidates, the most senior employee is awarded the job. Therefore, non-minority employees who have more seniority with The District very often outrank minorities who meet the minimum qualification for the position. The agreement covering Local 1026 contains a Rule of Five and for Local 3713 contains a Rule of Three for all promotions and transfers.

If warranted, The District may review and reclassify employees whose jobs have changed as a result of reorganization and/or the assumption of more complex duties and/or responsibilities. Records on reclassification decisions are maintained to ensure that such reclassifications are not unlawfully based on race, color, religion, sex or national origin.

3. Separations and Terminations

a. Voluntary Separations

By definition, voluntary separations do not involve an employer decision or "selection." Therefore, they are not subject to any statistical analysis of "selection disparities." Examples of voluntary separations would include resignations and retirements. Information collected through voluntary exit interviews will be reviewed to ensure that voluntary separations are not the result of treatment unlawfully based on race, color, religion, sex or national origin.

b. Involuntary Separations

There are a variety of reasons why a person might leave the employment of The District other than by choice. Involuntary separations may involve employer decision but may not necessarily be for "cause". For example, an employee may be unable to return, as hoped or expected, from a long-term illness and/or workers' compensation injury. Some separations may be planned, such as the completion of a temporary assignment or expiration of an employment contract. In the event The District eliminates and/or reduces its workforce; downsizing decisions will be made in accordance with bargaining unit agreements as applicable and without regard to race, color, religion, sex or national origin.

c. Terminations

Terminations for "cause" do involve an employer decision. Information collected is reviewed to ensure involuntary terminations are not the result of treatment unlawfully based on race, color, religion, sex or national origin.

B. COMPENSATION SYSTEMS

The District has standardized pay practices. Collective bargaining agreements define negotiated compensation structures, practices and working conditions for the three bargaining units. There are no race, gender or ethnicity-based disparities in these practices or rates of pay.

For non-bargaining unit positions, The District has a formalized grade and salary structure, with a salary range established for each grade that is designed to be internally equitable and externally competitive. This compensation structure serves as a tool to address compensation issues in a systemic way, to attract and retain highly qualified individuals, and to maintain internal equity. For positions within each pay grade there are no race, gender or ethnicity-based disparities.

1. New Hires

In the event new hires are not started at Step One of the salary schedule, the following variables are considered in establishing the hiring rate for any position:

Qualifications and experience of the candidate of choice - both the nature and extent of prior experience influence hiring rates.

Market rates of compensation for comparable positions in the area.

The individual's current salary and salary history.

There are no race, gender or ethnicity-based disparities in establishing hiring rates.

A review of external hires for the prior year indicates the presence of equal employment opportunity and a strong commitment to affirmative action. **There were 36 total hires including thirteen (13) women at 36.1% and thirteen (13) minorities 36.1% (A report summarizing hiring activity by job group is in the Exhibits at the end of this plan).**

2. Promotions

All District promotions are competitive. In determining the new salary of a promoted employee, The District adheres to provisions of the applicable collective bargaining agreement for the available bargaining unit position. If it is a non-bargaining unit position, any or all of the criteria used for new hires, as described above, may be used. All jobs are posted in accordance with collective bargaining unit agreements and/or posting procedures.

3. Merit Increases

Salary schedules are typically adjusted once each year. Salary adjustments within each pay scale are based on performance reviews, which are conducted either annually or semi-annually depending on the employee group. Performance reviews for management positions at pay grade EE 15 or higher are conducted at the end of each calendar year. For other employees rated annually, they are conducted at the employee's anniversary date of hire. For employees reviewed semi-annually, they are conducted at 6-month intervals from the date of hire.

Employees are required to complete an initial probationary period. The duration of the probationary period varies by employee group.

The District has implemented a performance-based compensation plan for Management Level Positions EE-15 and above. Provided that the program is funded, compensation, which is based on merit, is in the form of a single annual payment in addition to the participant's annual base salary. Compensation payments under the performance plan are a combination of salary step increments, consistent with the overall District salary schedule, and performance bonuses. An employee must be at EE 15 or above for at least six months to be eligible to participate in any year's compensation plan.

C. PERSONNEL PROCEDURES

The District strives to employ qualified personnel and to provide equal employment opportunities for all applicants and employees. The Human Resources Department is responsible for the implementation of these procedures and practices and works with appropriate managers to implement human resources policies and procedures.

1. Recruitment and Selection

The District is an Equal Opportunity Employer and selects individuals based solely on the basis of their qualifications and ability to perform the duties of the job to be filled. Recruitment efforts may include any or all of the following: posting the position, review of previously qualified applicants, external recruitment and/or panel interviews. In some cases, Executive Search firms are used to recruit high-level management positions.

The Human Resources Department begins a recruitment process when a vacancy occurs or is anticipated, and it is determined that the position will be filled. The District takes the steps necessary to ensure that all appropriate recruiting sources are informed. When The District advertises in printed media and/or on the Internet for prospective employees, the advertisement includes language referencing The District as an Equal Opportunity Employer. The District advertises in special interest publications and affirmative action recruiting sources as appropriate for specific positions and lists vacancies with the State job service.

External recruitment may occur concurrently with or subsequently to internal recruitment. At the discretion of the Director of Human Resources, internal/external recruitment may include a panel interview process. The Human Resources Department administers the panel process.

All candidates are screened by Human Resources to ensure that they meet the minimum qualifications. An applicant who is not selected and wants to know the reason for the non-selection should be referred to Human Resources.

2. Promotional Opportunities

Promotional opportunities are posted in accordance with established practice and collective bargaining Agreements, when applicable. These positions may involve lateral transfer, promotion with a change in work location, promotion without a change in work location, or demotion, if this is the desire of the internal applicant. If an employee is interested in a lateral move to the same position in another department or any other sort of change in his or her job, he or she must apply for and be selected for a posted position, in competition with all other applicants for the opportunity. All employees, including women and minorities, are encouraged to take advantage of the opportunity to apply. Employees may also be promoted non-competitively. Typically, this is a result of reorganization and/or a position reclassification reviewed and approved by the Human Resources Department. The District Board's Personnel, Pension and Insurance Committee and The District Board must approve changes in job descriptions, and/or salary grades.

3. Orientation Procedures

The Human Resources Department provides a general orientation program for all new hires. An Employee Handbook, provided to all new hires, is designed to illustrate current policies and practices of The District. Additional orientation specific to the employee's department and job is provided by supervision.

The District has and will continue to evaluate its human resources practices and procedures to determine whether they operate as impediments to equal employment opportunity. Hiring and promotional procedures are written and they do not discriminate on the basis of race, sex, ethnicity or other prohibited bases, and are applied in a non-discriminatory fashion.

SECTION XI

DEVELOPMENT AND IMPLEMENTATION OF ACTION-ORIENTED PROGRAMS

The District has developed and will continue to develop action-oriented programs to attain established goals and objectives. These programs are not directed toward any impediments to equal employment opportunity in our existing practices; rather, they are additional good faith efforts to expand employment opportunities and produce measurable results. These programs, listed below, demonstrate the good faith efforts by The District to remove any identified barriers, expand employment opportunities, and produce measurable results.

1. The District has analyzed and will continue to analyze all positions and prepare written descriptions to accurately reflect position functions. Due to the use of a position description format, they are and will continue to be consistent for the same position from one organizational unit to another.
2. Job descriptions have been and will continue to be reviewed to determine the knowledge, skills, abilities, and other requirements necessary for the adequate performance of every job. Specifications will continue to be consistent for the same job title in all organizational units and will not contain any requirements that would result in discrimination on the basis of race, color, religion, sex, age, disability, veteran status, national origin, or other characteristic protected by law.
3. The District has carefully evaluated the total selection process and found it to be free from discrimination.
 - A. All supervisory personnel have been instructed to ensure elimination of discrimination in all personnel actions in which they are involved.
 - B. Application forms do not contain questions with potential discriminatory effects.
 - C. The District does not and will not use any selection techniques that can be improperly used to discriminate against minority groups or women.

1. The District has evaluated its techniques for improving recruitment and increasing the flow of qualified minority or female applicants through the following:
 - A. Minority and women, as well as non-minority and male, employees are actively encouraged to refer applicants to The District.
 - B. The District provides an orientation program to inform new employees of their equal employment responsibilities, promotional opportunities, District rules, ways to alleviate any problems that might arise, and any other issues related to affirmative action compliance.
 - C. Local organizations will continue to be contacted for referrals of potential minority and female employees.
 - D. The District utilizes the Internet to identify targeted recruitment sites for qualified minority and female applicants.

Where placement goals exist as defined by the Office of Federal Contract Compliance Programs, The District will continue to contact universities and two- and four-year local colleges, vocational technical schools, high schools, local business schools, and state and community organizations that attract qualified minority and female students. The District will advise these institutions of our desire to fill job openings in these classifications with minority and female employees. When possible, The District will continue to participate in job fair and career day activities and we will consider relevant work experience programs.

- E. The District will continue to contact our normal sources of recruitment (e.g., State Employment Service) and advise them that under the AAP we are specifically seeking to employ minorities and/or women for job openings.
4. The District has implemented the following specific programs and procedures to ensure that minority and female employees are given equal opportunities for promotion:
 - A. On-the-job training is provided to all qualified employees to assist them in developing the necessary knowledge and skills for promotion to higher-level jobs. In addition, a tuition reimbursement benefit is also available to all qualified employees.

- B. The District utilizes a formal performance evaluation program for all employees. In addition, management and supervisors are trained on the basic methodology of performance evaluation.
- C. Neither minority nor female employees are required to possess higher qualifications than those of the lowest qualified incumbent in the job for which they apply.
- D. Opportunities for advancement into more stimulating positions will continue to be made available through the career development process and minorities and women will be encouraged to take advantage of these opportunities.
- E. Special internal training programs will continue to be provided as necessary to ensure the achievement of the placement goals. Programs are offered to eligible employees without regard to race, color religion sex age disability, veteran status, sexual preference, national origin or any other characteristic protected by applicable laws.

In addition to all of the programs listed above, The District is establishing the following goals to be achieved in one year.

- 1. The District will analyze all applicant flow data both for hires and promotions to determine if the recruitment outreach is reaching both qualified women and minorities. This goal is being continued, as the District will be implementing the iApplicant software program to better track applicant data and run EEO reports.**
- 2. The summer internship program that is funded by the Human Resource Diversity Budget, which includes all variety of positions, will continue to be developed for more opportunities. This goal is being continued to allow for the Winter Internship Program.**
- 3. The District through its PMU will continue to concentrate on reaching more women and minority contractors and assist them in preparing the necessary documentation they need, specifically being registered with the State, to be considered for District- approved projects.**
- 4. PMU will provide apprenticeship opportunities for the mentoring of individual/s on each construction project.**

SECTION XII

AFFIRMATIVE ACTION ADVISORY COMMITTEE

The District has an established Affirmative Action Advisory Committee, herein referred to as the AAAC.

The Affirmative Action Advisory Committee is an internal employee committee established to monitor the implementation of the Affirmative Action Plan. Additionally, through the development of program initiatives, the AAAC will advocate for cultural awareness, respect, and the inclusion of all people and cultural perspectives; will disavow discrimination and harassment toward any employee; and, will work towards equitable employment opportunities for all employees.

Membership of the AAAC shall consist of six (6) representatives from the Division of Administration and (6) representatives from the Division of Operations. It shall be a goal to have at least three (3) managers or supervisors of the twelve (12) people serving from the divisions.

The District Diversity Officer meets with the committee and serves as an internal resource. Other internal resources include the established District employee committees.

External resources may include representation from the Board of the Commission, community organizations and the municipal government partners of The District who will meet with the committee when requested.

The AAAC meets monthly to discuss and, when appropriate, recommend policies and programs to management that could assist in equal opportunity/diversity for all employees.

SECTION XIII

CONTRACT COMPLIANCE **MINORITY AND WOMEN BUSINESS ENTERPRISE PROGRAM**

Contract Compliance

The District is on public record as being an affirmative action/equal employment opportunity employer. Consistent with that posture the following action has been taken:

All bidders, contractors, subcontractors and suppliers of material are notified of the District's affirmative action (contract compliance) policies. Notice includes a statement that The District will not knowingly do business with any bidder, contractor, subcontractor, or supplier of materials who discriminate against members of any protected class.

Overview Of Recruitment

The District has also initiated and undertaken aggressive, positive relationship-building activity to ensure that Affirmative Action is more than a paper commitment.

The District encourages the participation of minority business enterprises that meet qualifications established in regulations issued pursuant to Section 4a-61 or 32-9f C.G.S. or Federal law. The District refrains from knowingly doing business with any bidder, contractor, subcontractor or supplier of materials debarred from participation in any State or Federal contract program, or found to be in violation of a State or Federal anti-discrimination law. The District will encourage bidders, contractors, subcontractors and suppliers of material to implement Affirmative Action plans of their own.

All contractors must demonstrate nondiscrimination and a "good faith effort" to employ minority and women business enterprise as subcontractors.

The District maintains the name and address of each organization, recruitment source, bidder, contractor, subcontractor, supplier of materials, publisher and union receiving notice of The District's policy and date of notice; as well as, copies of all communication, statements, advertising and contract provisions with the above groups or individuals.

Contract Compliance/Small Business Set-Aside Activities

The District has an established MBE/WBE Set-Aside Advisory Committee.

The District has also established the following committees: the Citizen's Advisory Committee and the Strategic Advisory Committee. The CAC is a group of community leaders and citizens involved in the Metropolitan District's clean Water Project. The CAC, working in conjunction with their consultants, was created to elicit public feedback and guidance on the planning of projects. The SAC has been formed to facilitate outreach to the region's small, women-and minority-owned business, as well as individuals, to award opportunities available in the Clean Water Project.

The District has engaged Miller3 Consulting Inc. to conduct a Disparity Study of MDC's contracting practices on MBE/WBE firms. The study will include the following: Legal Analysis, Procurement and M/W/DBE Program Operational Analysis, Data Collection, Utilization Analysis, Disparity Analysis, Race Neutral Analysis , Private Sector Analysis and Final Reports. The Study has already begun and is scheduled to be completed in 11 months.

DMC-PMU has also engaged an Interim Diversity Manager to assist the Chief of Program Management and assist in the enhancement of the minority workforce development, economic diversity and assisting in the implementation of Minority Outreach and Engagement programs.

The District is a major member of the Connecticut Minority Suppliers Development Council and actively participates in the Council's training and advocacy programs. The District exhibition booth is prominently displayed at annual public events sponsored by the Council.

Participation in the annual work-fair sponsored by the Connecticut Departments of Transportation and Administrative Services is a traditional activity.

The District's fiscal staff has established a vendor list that includes Minority Business Enterprise (SBE) and Minority Business (MBE) Enterprise Vendors. The list is updated when new vendors become available.

While the above are ongoing activities of The District, even more enthusiastic attention to this area has been required due to the beginning of a major new District project, known as "The Clean Water Project". Through this project The District anticipates more opportunities for the involvement of minority and women owned firms and their employees, and The District is vigorously pursuing these firms.

In order to more effectively manage the project, a new Program Management Unit was created including two (2) diversity positions responsible for the management and

coordination of diversity activities, the PMU Diversity Manager and the PMU Diversity Officer.

Working with the new Program Management Unit diversity staff is the Small Business and Community Outreach and Engagement Advisory Committee. This is a strategic planning advisory group whose members' names and organization affiliations are located at the end of the plan in the Exhibits.

SECTION XIV

THE METROPOLITAN DISTRICT INTERNAL COMPLAINT PROCEDURE

Policy & Procedure on Discrimination Complaints

The District has adopted a policy of “zero-tolerance” with respect to unlawful employee harassment. In this connection, the District expressly prohibits any form of unlawful employee harassment based on race, color, religious creed, sex (including pregnancy and transsexualism), national origin, ancestry, age, sexual orientation, genetic background information, physical disability, learning disability, mental retardation, past or present history of mental disorder, criminal record, or status in any group protected by state or local law (including marital status) and status as a Vietnam-era or special disabled veteran. Improper interference with the ability of District employees to perform their expected job duties will not be tolerated.

The following procedure provides confidential counseling and is completely independent of any other grievance procedure presently in place. It is for the purpose of resolving employee allegations of discrimination at the Metropolitan District in an expeditious and informal manner.

This procedure, or submission of a complaint to this procedure, in no way precludes the submission of a complaint of a discriminatory nature to the Connecticut Commission on Human Rights and Opportunities, the United State Equal Employment Opportunity Commission, the United States Department of Labor (Wage and Hour Division), or any other agency (state, federal or local) that enforces laws concerning discrimination in employment. Nor, does the establishment of this procedure foreclose any other legal options available to the employee.

Violation of this policy may be grounds for disciplinary action, up to and including dismissal from The Metropolitan District .

A. Definition/Legal Basis:

Race, Color, Religion, Sex or National Origin

Title VII of the Civil Rights Act of 1964 (as amended) and Executive Order 11246 (as amended) prohibit discrimination in employment against any person (e.g. applicants and employees) on the basis of race, color, religion, sex or national origin. Also protected under Connecticut General Statute 46a-60, stating discriminatory practices prohibited against any person based on race, color, religious creed, sex, national origin, ancestry, age, sexual orientation, genetic background information, physical disability, learning disability, mental retardation, past or present history of mental disability, status as a Vietnam-era or special disabled veteran, prior conviction of a crime or status in any group protected by state or local law (including marital status).

Age

The Age Discrimination in Employment Act of 1967 (ADEA), (as amended) prohibits discrimination in employment on the basis of age against any person (e.g. applicants and employees) age forty (40) or older. Connecticut General Statute 46a-60 does not have an age limit.

Disability

The Rehabilitation Act of 1973 defines “disabled individual” as any person who has a physical or mental impairment that substantially limits one or more of such person’s major life activities, has a record of impairment, or is regarded as having such an impairment. Section 7(b) of the Rehabilitation Act addresses drug and alcohol abuse, noting that the definition of “disabled individual” does not include any individual who: is “an alcoholic or a drug abuser whose current use of alcohol or drugs prevents such an individual from performing the duties of the job in question or whose employment, by reason of such current alcohol or drug abuse, would constitute a direct threat to the property or the safety of others”.

Persons with disability are defined in the Connecticut General Statutes Sec. 46a-8 as “any person who has a physical, mental, emotional, or other disability or dysfunction which constitutes a significant obstacle to such person’s ability to function normally in society and includes those persons defined as developmentally disabled under Public law 94-103 and any amendments thereto.” Physically disabled is defined under Connecticut General Statutes Sec. 46a-51(15) as “any individual who has any chronic physical handicap, infirmity or impairment, whether congenital or resulting from bodily injury, organic processes or changes from illness, including but not limited to, epilepsy, deafness or hearing impairment or reliance on a wheelchair or other remedial appliance or device”. Learning disability is defined in the Connecticut General Statutes Sec. 46a-51(19) as “an individual who exhibits a severe discrepancy between educational performance and measured intellectual ability and who exhibits a disability in one or more of the basic psychological processes involved in understanding or in using language, spoken or written, which may manifest itself in a diminished ability to listen, speak, read, write, spell or to do mathematical calculations.”

The Americans with Disabilities Act of 1990 (ADA) prohibits discrimination against qualified individuals with disabilities. The ADA covers not only individuals who have disabilities, who have records of disabilities, or who are perceived as having disabilities, but also individuals related to, or associated with, persons who fit into one of these categories.

Status as a Vietnam-era or special disabled veteran

The Vietnam Era Veterans Readjustment Assistance Act of 1974 (VEVRAA) defines Vietnam-era veteran as an eligible veteran any part of whose active military, naval, or air service was during the Vietnam era (between August 5, 1964, and May 7, 1975). To be an eligible veteran, a person must have served on active duty for a period of more than

180 days and have been discharged or released therefrom with other than a dishonorable discharge or have been discharged or released from active duty because of a service connected disability.

EVRAA defines a special disabled veteran as:

- a. A veteran who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Veteran's Administration for a disability rated at thirty (30) percent or more, or rated at ten (10) or twenty (20) percent in the case of a veteran who has been determined to have a serious employment handicap; or
- b. A person who was discharged or released from active duty because of a service-connected disability.

B. Resolution – Time Constraints

The Diversity Officer will attempt to resolve any alleged discrimination or unfair employment practice within ninety (90) calendar days after the receipt of a written complaint. This is for filing, processing and resolution of the complaint.

C. Records Retention

All records relevant to employee grievances including counseling sessions and informal allegations which result in complaints to enforcement agencies, are maintained, regularly reviewed and reported on by the agency Diversity Officer in the Affirmative Action Plan.

D. Procedure for Handling and Investigating Discrimination Complaints

If you feel you have been a victim of discrimination please follow the following procedures:

1. Complainant requests a confidential meeting with the Diversity Officer. The Diversity Officer will advise the complainant of his or her rights in accordance with relevant laws and propose possible remedies.
2. If the Complainant is unsatisfied with any of the possible remedies or if a remedy is not readily available the Complainant then has the right to file a written complaint with the assistance of the Diversity Officer. The written complaint must include the following [please note: all grievances should be submitted within thirty (30) days of the alleged discriminatory treatment]:
 - a. Complainant's name.
 - b. Work telephone number.
 - c. Job title.
 - d. Supervisor's name.
 - e. Supervisor's title.

- f. Name of individual against whom the complaint is filed.
 - g. The nature of the complaint.
 - h. A description of the alleged act (s) of discrimination.
 - i. The dates the act(s) took place.
 - j. The date the complaint was filed.
 - k. The Complainant's signature.
2. The Diversity Officer will notify the accused party of the particulars of the complaint within seven (7) calendar days after receipt of the written complaint.
 3. Upon the filing of a complaint, the Diversity Officer will conduct an investigation of the complaint. Within thirty (30) calendar days from the filing of the complaint, the Diversity Officer will provide a written report to the Complainant, the Accused, the CEO and/or a manager as appropriate. If there is evidence that indicates the Complainant was discriminated against, the parties shall endeavor to resolve the matter within thirty (30) calendar days and/or an administrative action (e.g. discipline up to and including dismissal from the District) will be applied to the accused. If the endeavors at mediation are successful, a written agreement will be prepared for signature (by the Complainant, the Accused, the CEO and the Diversity Officer).
 4. If there is no evidence of discrimination, the Diversity Officer will advise the parties involved and dismiss the complaint and or follow up with Human Resources for appropriate action.

If the Complainant does not agree with the findings made in the investigation, he/she may appeal for review and reconsideration by the Chief Executive Officer. Any such appeal must be in writing and be filed within ten (10) calendar days from the date of the written report of the findings and must include specific information or evidence in support of the appeal. The Chief Executive Officer will advise the Complainant in writing within fourteen (14) calendar days of receipt of the appeal as to the his or her choice of action on the matter.

D. Retaliation for Discrimination Complaints

Retaliation for having filed or participated in a complaint or investigation of discrimination is presumptive employment discrimination in violation of the law and as such will not be tolerated.

Definition of Retaliation:

1. Disciplining, changing work assignments of, providing inaccurate work information to, or refusing to cooperate or discuss work related matters with an employee because that employee has complained about or resisted harassment, discrimination or retaliation.
2. Intentionally pressuring, falsely denying, lying about or otherwise covering up or attempting to cover up conduct such as that described in any item above.

The above is not to be construed as an all-inclusive list of prohibited acts under this policy.

If you feel you have been the subject of retaliation for having filed or taken part in a discriminatory complaint/investigation please contact the Diversity Officer immediately.

DISCRIMINATION COMPLAINT AGENCIES

An individual has the right to file his or her complaint of discrimination with any or all of the relevant agencies listed below. The individual can also simultaneously avail himself or herself of the Metropolitan District Commission's Internal Complaint Grievance Procedure.

1. The Connecticut Commission on Human Rights & Opportunities

Southwest Region

1057 Broad Street
Bridgeport, CT 06604
Tel: (203) 579-6246

Capitol Region

1229 Albany Avenue
Hartford, CT 06112
Tel: (860) 566-7710

West Central Region

Rowland State Government Center
55 West Main Street, Suite 210
Waterbury, CT 06702-2004
Tel: (203) 805-6530

Eastern Region

100 Broadway
Norwich, CT 06360
Tel: (860) 886-5703

Complaints should be filed with the Commission on Human Rights and Opportunities no later than one hundred and eighty (180) days after the alleged act of employment discrimination occurred.

2. The Equal Employment Opportunities Commission

John F. Kennedy Federal Office Building
Government Center, Room 475
Boston, MA 02203
Tel: (617) 565-3200

Complaints should be filed with the Equal Employment Opportunities Commission no later than one hundred and eighty (180) days after the alleged act of employment discrimination occurred, except, that in a case when the aggrieved person has initially filed a complaint with the Commission on Human Rights and Opportunities, such complaint should be filed no later than three hundred (300) days after the alleged act of employment discrimination occurred.

Alternatively:

3. Connecticut Permanent Commission on the Status of Women

18-20 Trinity Street
Hartford, CT 06106
Tel: (860) 240-8300

4. Regulation of Wages Division, Connecticut Labor Department

200 Folly Brook Boulevard
Wethersfield, CT 06109
Tel: (860) 566-3450

5. Wage and Hour and Public Contracts Division

United States Labor Department
135 High Street
Hartford, CT 06103
Tel: (860) 240-4277

SECTION XV

INTERNAL AUDIT AND REPORTING SYSTEM

The District has developed and implemented an auditing system that periodically measures the effectiveness of its total AAP. The District views the activities that are listed below as critical to the success of the AAP.

1. The Diversity Officer in conjunction with Human Resources will continue to monitor records of applicant flow, referrals, placements, rejected offers, training, transfers, promotions, terminations, and any layoffs or recalls to ensure that The District's non-discriminatory policy is carried out. Procedures are reviewed and revised as problems are identified.
2. Top management is and will continue to be informed of any problems that arise in their respective areas so that immediate and appropriate steps can be taken to resolve any issues.
3. The District recognizes its responsibility to affirmative action and is committed to fulfilling this responsibility by complying with all government regulations and laws pertaining to equal employment opportunity. As part of this commitment, management will be kept abreast of developments in the affirmative action area. The primary vehicle for communication with management will be periodic affirmative action briefings.
4. The Diversity Officer will generate internal reports on a regular basis to evaluate the degree to which equal employment opportunity and organizational objectives are being obtained.
5. The District will review report results with all levels of management as to the degree to which their affirmative action goals and compliance are being attained, and will design and implement corrective actions, including adjustments in programs, as needed.
6. Progress on The District's AAP will be discussed at supervisors meetings, and relevant information will be communicated to employees during regular departmental meetings as appropriate.
7. The Diversity Officer will periodically report to the Chief Executive Officer and other appropriate top management on the effectiveness of the program and will submit recommendations for improvement.

SECTION XVI

CONCLUDING STATEMENT

The District's Affirmative Action Plan shows a continued commitment to equal employment opportunity, affirmative action and diversity and has strong plans to ensure both District and employee success.

Through its Diversity Officer, The District will continue to communicate its policies, both within the organization and to the community. The Chief Executive Officer gives the Diversity Officer full authority to take action to implement the plan and to pursue solutions to problems that might impede the progress of this plan.

As of January 1, 2008, an analysis of the composition of the workforce was undertaken. The workforce was analyzed by job group and by department to determine the employment of minorities and women, and to identify if placement goals are indicated when compared to the appropriate available workforce. The District expects to continue its successful outreach efforts and to ensure that all applicants and employees are treated fairly, based on job-related criteria and without regard to race, color, religion, sex, age, disability, veteran status, national origin, or any other characteristic protected by applicable law.

The District is mindful of the fact that continued achievements in the area of equal employment opportunity and affirmative action are important.

SECTION XV11

ADDENDUM - STATE ANALYSIS

NARRATIVE

The District also conducted a separate Availability Analysis of the total workforce by applying the Connecticut State Process.

The major difference between the Federal process and the State process regarding analysis and placement goals is that the State conducts an analysis of the total workforce by both male and female, race and gender. As previously stated in the body of this plan, the Federal analysis concentrates solely on women and minorities (as a group).

The following analysis and charts illustrate the differences between the two approaches, and will assist The District in making good faith efforts to meet the established placement goals and still continue to diversify the workforce.

State Availability Analysis

State Placement Goals

Comparison of Goals between the Federal and State Approach

XVIII EXHIBITS

1. Human Resource Department Equal Opportunity Form for Applicants
2. Personnel Action Summaries – New Hires
3. Internal Complaint Procedure Form
4. Small Business and Community Outreach and Engagement Strategic Advisory Committee
5. Definitions

METROPOLITAN DISTRICT COMMISSION
Human Resources Department
Equal Opportunity Information

COMPLETING THIS FORM IS VOLUNTARY AND IS NOT A REQUIREMENT OF EMPLOYMENT

.....

Various agencies of the United States Government require employers to maintain information on applicants pertaining to factors such as race, sex, and type of position applied for. The information requested is for the purpose of our compliance with these record-keeping requirements. **This information is confidential and separated from your application.** The Metropolitan District Commission (District) reaffirms its policy of equal employment opportunity for all qualified individuals without discrimination against any applicant or employee who is a member of any legally protected status, on the basis of, but not necessarily limited to: race, color, religion, age, marital status, sex, special disabled veterans and veterans of the Vietnam era, national origin, ancestry, sexual orientation, blindness, or any disability when such applicant or employee can, with reasonable accommodation, perform the essential functions of the job. Underscoring this policy is our strong concern for our employees' dignity and well being and our commitment to provide for a safe, productive and professional work environment.

.....

1. AGE:

- | | |
|--------------------------------------|-----------------------------------|
| <input type="checkbox"/> 16 or less | <input type="checkbox"/> 17 to 25 |
| <input type="checkbox"/> 26-40 | <input type="checkbox"/> 41 to 65 |
| <input type="checkbox"/> 66 or older | |

2. SEX:

- | |
|---------------------------------|
| <input type="checkbox"/> Female |
| <input type="checkbox"/> Male |

3. ETHNIC GROUP:

- | | |
|---|--|
| <input type="checkbox"/> Caucasian (Non-Hispanic Origin) | <input type="checkbox"/> Asian /Pacific Islander |
| <input type="checkbox"/> African American (Non-Hispanic Origin) | <input type="checkbox"/> Other |
| <input type="checkbox"/> Hispanic | |

4. HOW DID YOU HEAR ABOUT THIS POSITION?

- | | |
|---|---|
| <input type="checkbox"/> Hartford Courant | <input type="checkbox"/> Careerbuilder.com |
| <input type="checkbox"/> Monster.com | <input type="checkbox"/> MDC Web Site |
| <input type="checkbox"/> MDC Employee | <input type="checkbox"/> CT Job Service |
| <input type="checkbox"/> Walk – in | <input type="checkbox"/> America's Job Bank |
| <input type="checkbox"/> Publication/Newspaper (please specify) _____ | |
| <input type="checkbox"/> Job Fair (please specify) _____ | |
| <input type="checkbox"/> Professional Organization (please specify) _____ | |
| <input type="checkbox"/> Internet (please specify) _____ | |
| <input type="checkbox"/> Other (please specify) _____ | |

.....
I CERTIFY THAT THE ABOVE INFORMATION IS CORRECT.

Name: _____ Position Applying For: _____

Address: _____ City/State/Zip: _____

Signature: _____ **Date:** _____

THE METROPOLITAN DISTRICT COMMISSION

**PERSONNEL ACTION SUMMARIES – NEW HIRES BY JOB GROUPS
PROGRESS TOWARD GOALS**

From January 1, 2007 through December 31, 2007

EEO Category	Job Group	Hiring Goals		2007 Hires		
		Female	Minority	Total	Female % of Goal	Minority % of Goal
EEO 1	Officials & Administrators	0	2	3	0 na	1 50%
EEO 2	Professionals	10	0	7	4 40%	2 na
EEO 3	Technicians	0	0	3	2 na	2 na
EEO 4	Protective Services	0	1	1	0 0%	0 0%
EEO 5	Paraprofessionals	0	0	0	0 na	0 na
EEO 6	Administrative Services	0	0	5	5 na	3 na
EEO 7	Skilled Craft	2	0	16	2 100%	4 na
EEO 8	Service Maintenance	1	0	1	0 0%	1 na
TOTALS		13	3	36	13	13



INTERNAL COMPLAINT PROCEDURE

Personal Information:

Complainant's Name: _____

Work Phone Number _____

Cell Phone Number: _____

Job Title: _____

Department _____

Supervisor's Name: _____

Supervisor's Title: _____

Nature of Complaint:

Name(s) of Individual(s) Accused: _____

Date and location of alleged discrimination: _____

Names of any known witnesses: _____

Please describe the nature of your complaint as well as a description of the alleged discrimination. For additional space, please document on a separate sheet of paper that should be signed and dated by the complainant and attached to this form:

I certify that all statements made in this form are true and complete to the best of my knowledge. I understand that false or misrepresentation of information may be grounds for dismissal of this formal complaint and may result in possible disciplinary action.

Signed: _____

Date: _____

Please include all necessary documentation and submit to the The District's Diversity Officer to initiate investigation.

SMALL BUSINESS AND COMMUNITY OUTREACH & ENGAGEMENT

STRATEGIC ADVISORY COMMITTEE

**Adam Cloud
1366 Asylum Avenue
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DEFINITIONS

Availability Analysis: The process that estimates how many minorities and women are available for employment. The percentages this analysis produces are the benchmarks against which the employer's utilization of minorities and women is measured.

Census Areas: Geographic areas for which the U.S. Bureau of the Census provides census data (for example, United States, counties, metropolitan areas and states)

Comparison Group: A race or sex classification whose selection rates are compared to a protected group's selection rates to determine whether adverse impact exists. The comparison group could be males, Whites or non-Blacks.

Department-Job Cost Center: The organizational unit to which an employee or job title is assigned

Factor 1: The percentage of minorities and women among those having requisite skills in the recruitment area.

Factor 2: The percentage of minorities and women among those promotable, transferable or trainable from within the facility.

Feeder Job Group: A job group from which employees can be promoted, transferred or trained into a job group being analyzed in Factor 2.

Goals: The target percentages for women and minorities moving into the job group during the AAP year. Goals are the same as the final availability percentages found in the Availability Analysis report.

Goal Attainment: The measurement of a facility's progress against established goals for women and minorities moving into the job group during the AAP year. The measurement is based on cumulative year to date total, women and minority counts of those who have moved into a job group since the AAP was prepared.

Incumbency v. Availability: Employment of fewer minorities or women in a job group than would be reasonably expected given their availability.

Job Group: One or more jobs having similar content, wage rates and opportunities.

Job Group Analysis: A list of all job titles within a job group, ranked from the lowest paid job to the highest paid job.

Job Title: The name of a position.

Minorities: All persons classified as Black, Hispanic, Asian or Pacific Islander, American Indian or Alaskan Native, or other Minority.

Protected Group: A race or sex classification that is protected by law or policy and whose selection rates must therefore be monitored for adverse impact.

Recruitment area (or Labor Market Area): The Geographic area from which an employer draws its workforce. Availability Factor 1 examines the recruitment area.

Workforce Analysis: A list of all jobs titles within a department or work unit, ranked from the lowest–paid job to the highest–paid job.