



# Equal Employment Opportunity Good Faith Efforts

Organization, Personnel & Technology Committee  
September 9, 2019  
Item 6a

# Equal Employment Opportunity Program

- How Good Faith Efforts are determined
- What Good Faith Efforts have been undertaken

# Good Faith Efforts

- Required under MWD's Affirmative Action and Nondiscrimination programs
- Purpose to break down barriers and ensure equal access
- Nondiscrimination Program covers women and minorities through functional plan approach
- Determine any underutilization of women and minorities in job groups through statistical analysis
- Develop strategies and action oriented efforts to address any practice that inhibits the employment, promotion or retention of women and minorities

# Business Plan

- Management business plan related to EEO with a ***collection of analyses, and related strategies, to identify and rectify over time*** issues related to EEO
  - Identify a goal (identify/remove non-job related barriers to employment)
  - Establish a baseline
  - Compare current state to the baseline
  - Create strategies (aka Good Faith Efforts) to address identified issues
  - Implement strategies (“The Plan”)
  - Determine if strategies are working
  - Change/modify plan (keep what’s working, change what’s not)



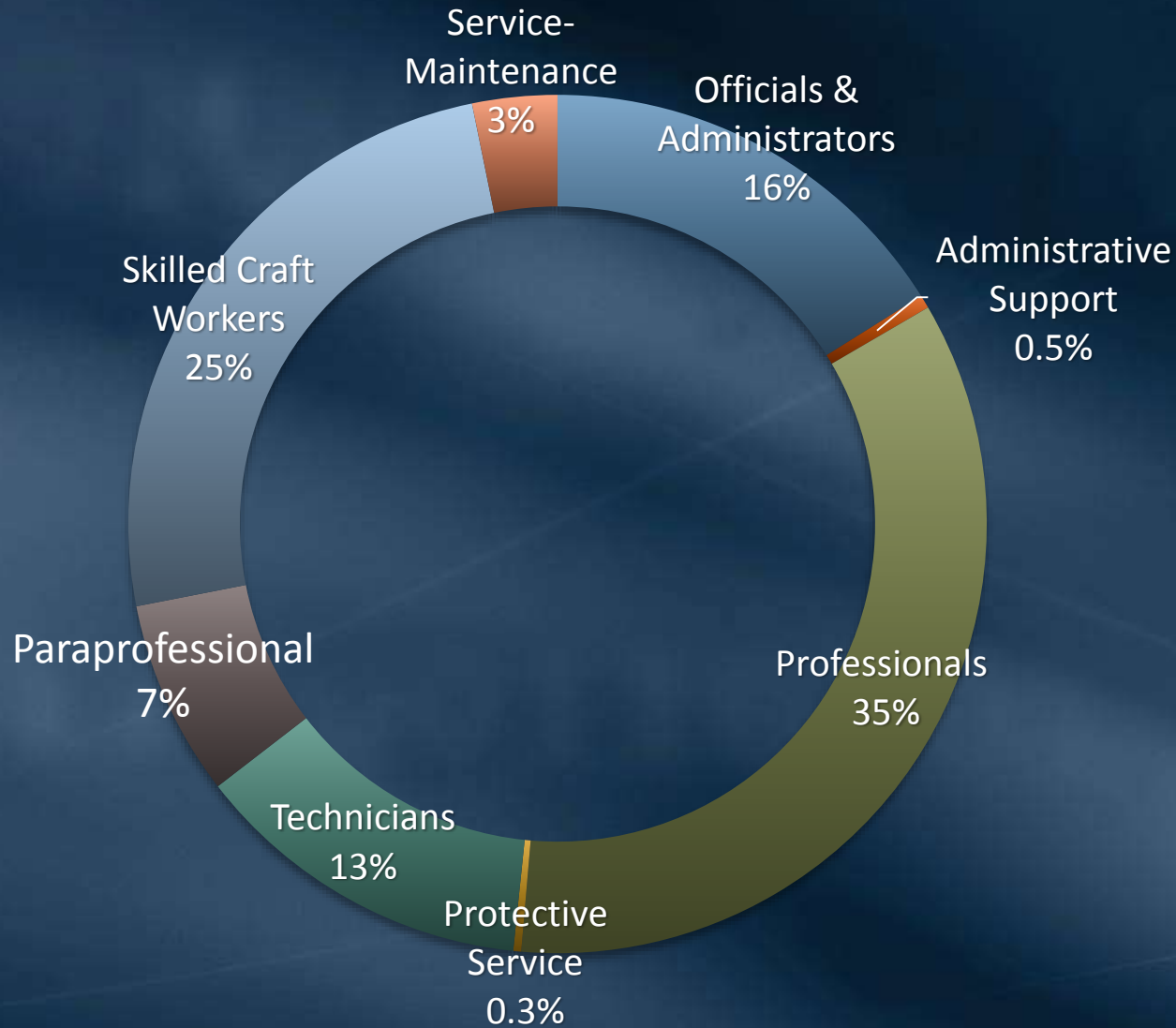
# What We Look Like: Job Groups

- Groupings of jobs that are similar in:
  - ✓ Content
  - ✓ Wage Rate
  - ✓ Opportunity
- Should *never* cross EEO categories
- Must be thoughtful or can artificially create a problem
- Analysis are conducted by job group for each business line



# Metropolitan's Workforce as of 12/31/18

regular employees



# What We Should Look Like: Availability

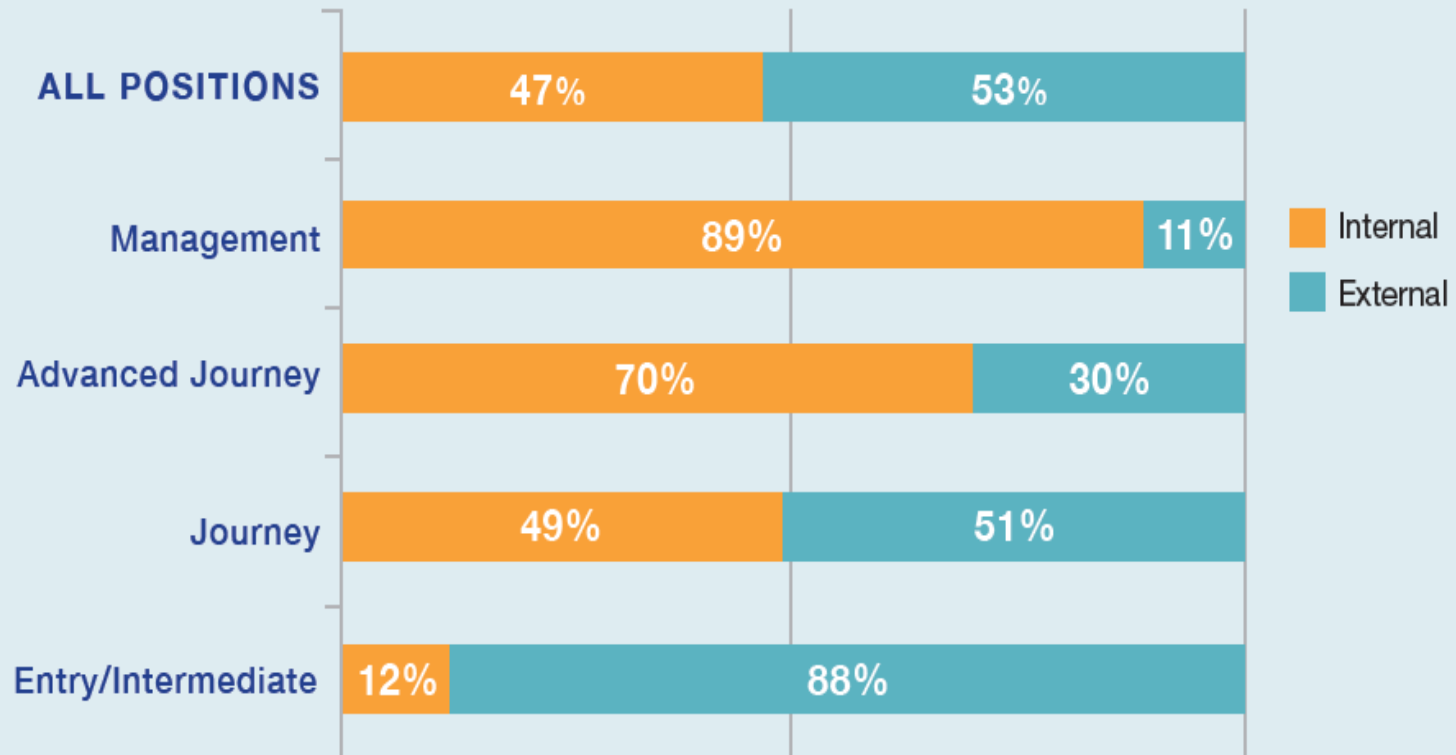
- Estimation of the number of *qualified* women or minorities available for employment in a given job group
- Combination of *external* and *internal* data used to identify what those *qualified* to work in the job group are “supposed” to look like



## PROFILE OF INTERNAL/EXTERNAL HIRING

2018:

227 positions filled through recruitment or transfer



# What We Should Look Like: Availability

## ● Two Factor Analysis

### 1. *External Factor*

Step 1: Define *relevant labor area* (e.g., local, state, national)

Step 2: Identify/select census occupation codes

Step 3: Weight census codes based upon representation within each job group (\*if more than one COC)

### 2. *Internal Factor*

Step 1: Identify internal *“Feeders”* for all jobs groups

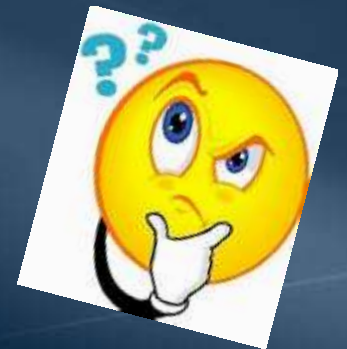
Step 2: Weight feeders - use historical promotions and hires data (requires a heavy dose of personal review of data)

# What We Should Look Like: Availability

- **Factor Weights**

- % weight given to the internal and external factors for each job group
- In assigning factor weights, what number do I expect to come from a relevant labor area (external) or an internal pool?

- **Final availability** is compared to the job group headcounts to determine existence of underutilization



# Identify Underutilization

## ● Utilization Analysis

- Compares what we look like to what we should look like
- Compares % of women, individual race groups & minorities in each job group with the final availability for the job group
- **Underutilization** - when the % of minorities or women employed in a job group is less than would reasonably be expected
- Underutilization DOES NOT Equal Quotas and is NOT a declaration of discrimination!

# Analysis Components



# Example

Snap Shot Date: 6/30/18

## Job Group Analysis

**Job Group:** ES2E4 - Professionals - E4

EEO Code	Job Code	Job Title	EEs	Male	Female	Min	W	AA	H	A	AI/AN	NH/PI	2+
2	YA24CD	Asst Engineer I - Civil	4										
2	YA24SD	Asst Engineer I - Structural	1										
2	YA24FP	Asst Engineer I - Facility Planning	1										
2	YA25FP	Asst Engineer II - Facility Planning	1										
2	YA25SD	Asst Engineer II - Structural	1										
2	YA25CD	Asst Engineer II - Civil	3										
		Total (#)	11										
		Total (%)											

# Example

Factors					
Job Group Title	Local	Reasonable National/State	Internal	Total %	Occup Code
WSO1C - Managers - C	20%		80%	100%	0430
ES2E3 - Professionals - E3	50%		50%	100%	1360
ES2E4 - Professionals - E4	100%			100%	1360
WSO7C1 - Skilled Craft - C1	90%		10%	100%	6335

Feeders					
Job Group Title	Feeder 1	%	Feeder 2	%	Total
WSO1C - Managers - C	WSO1D	75%	WSO1C	25%	100%
ES2E3 - Professionals - E3	ES2E4	100%			100%
ES2E4 - Professionals - E4	--	--	--	--	--
WSO7C1 - Skilled Craft - C1	WSO7C2	100%			100%

# Analysis Results

Job Groups by EEO-4 Category	# Job Groups with Underutilization of Female	# Job Groups with Underutilization of Minorities
Total Job Groups = 229		
Managers (36)	0	4
Professionals (96)	9	4
Technicians (31)	3	5
Protective Service (1)	0	0
Paraprofessionals (20)	1	0
Administrative Support (3)	2	0
Skilled Craft Workers (29)	1	6
Service/Maint. Workers (13)	0	2
# of job groups underutilized / total # of job groups	17 / 229	21 / 229



# Next Month

- What Good Faith Efforts have been undertaken based on analysis



