

HILL COUNTRY TRANSIT DISTRICT

Equal Employment Opportunity Policy/Program

April 2026

IDENTIFICATION INFORMATION

Hill Country Transit District
4515 W. US 190
Belton, TX 76513

Telephone: (254) 933-3700
Facsimile: (254) 933-3724

General Manager: Raymond Suarez

Equal Employment Opportunity Officer/
Program Manager and
Section 504 Coordinator: Ololade Hernandez

Note: For all EEO related matters, the EEO Officer/Program Manager reports and is directly responsible to the General Manager. However, if a complaint arises pertaining to the EEO Officer/Program Manager, employees/applicants may bypass her and proceed directly to the General Manager.

Hill Country Transit District
 Equal Opportunity Policy/Program

Table of Contents

Topic	Page
EEO Policy Statement	4
Non-Discrimination Policy & Procedures	5
Dissemination	6
Affirmative Action Plan	7
Discrimination Complaint Procedures	10
American's with Disabilities Act Compliance Plan	15
Section 504 Grievance Procedure	18
Auxiliary Aids	19

- Addendum A Board Appointment of EEO Officer & 504 Coordinator
- Addendum B Complaint of Discrimination Form
- Addendum C Assessment of Employment Practices
- Addendum D Workforce Analysis
- Addendum E Analysis Resource Data
- Addendum F Goals and Timetables
- Addendum G Monitoring and Reporting
- Addendum H Record of EEO Complaints Form
- Addendum I HCTD Organizational Chart

HILL COUNTRY TRANSIT DISTRICT

EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT

It is the policy and commitment of the Hill Country Transit District (HCTD) to provide equal employment opportunity for all persons and to prohibit discrimination on the basis of race, color, creed, sex, age, handicap, religion, national origin, marital status, or sexual preference. This policy applies to all employment practices, including recruitment, selections, layoffs, compensations, training, benefits, promotions, disciplinary actions, transfers and terminations and other terms and conditions of employment.

The major components of HCTD's EEO program are as follows:

- HCTD is committed to and has adopted an Affirmative Action Plan including goals and timetables, in order to overcome the effects of past discrimination on minorities and women.
- The Equal Employment Opportunity Program is an integral part of HCTD's everyday employment practices. Joint responsibility for the implementation and evaluation of the success of the policy shall rest with the office of the General Manager, Raymond Suarez, and the EEO Officer/Program Manager, Ololade Hernandez. All management personnel share in this responsibility and will be assigned specific tasks to assure compliance is achieved. HCTD will review, evaluate, and update this policy to keep it relevant and effective.
- Any HCTD employee or applicant for employment who feel he/she has been discriminated against because of race, color, religion, sex, national origin, age, handicap, marital status, or sexual preference has the right to register a complaint in accordance with procedures outlined in HCTD's Discrimination and Harassment Complaint Procedures which are set forth in HCTD's Equal Employment Opportunity Program.
- Performance by HCTD's managers, supervisors, etc. will be evaluated on the success of the EEO program the same way as their performance on other agency's goals, based on FTA circular 4704.1 [Ch. III, 2 a (6)].
- The successful achievement of HCTD's EEO goals will provide benefits to the recipient/sub recipient/ contractor through fuller utilization and development of previously underutilized human resources; based on FTA circular 4704.1, [Ch. III, 2 a (7)].

HCTD will take appropriate steps to ensure that all applicants and employees are aware of the fundamental meaning and intent of this policy. Supervisory staff shall be specifically instructed of their responsibilities and upholding the principles of this policy.

General Manager, Raymond Suarez

Date

NON-DISCRIMINATION

POLICIES & PROCEDURES

Hill Country Transit District (HCTD) promotes employment opportunity through a progressive program designed to provide equal opportunity without regard to race, color, creed, sex, national origin, age, or handicap.

- HCTD assures all applicants for employment with HCTD, and all HCTD employees are given equal consideration based solely on job-related factors, such as qualifications, performance, and availability. Such equal consideration applies to all personnel actions, including but not limited to recruitment, selection, appointment, job assignment, training, transfer, promotion, demotion, termination, pay rates, and fringe benefits.
- HCTD cooperates with agencies responsible for the enforcement of state and federal laws, executive orders, court rulings, and other regulations dealing with unlawful discriminatory practices related to employment.
- HCTD reviews, evaluates, and monitors all customer services and personnel matters to ensure these are in accordance with this policy and prompt attention is given to areas of inconsistency.
- HCTD investigates charges of alleged discrimination in employment and informs its employees of their rights in regard to equal employment opportunity.
- HCTD assures that employees act in conformity with the principles outlined in this policy through adherence to the above statements and recognizes that the effective application of equal opportunity in employment must involve more than a non-discriminatory policy statement.
- HCTD takes positive steps to eliminate any discrimination from personnel practices; ensuring that the district employs and develops a representation of qualified employees in each job category which reflects the demographics of the relevant labor force; and creates an environment that encourages upward mobility for all its employees.
- HCTD takes positive steps to ensure that no person shall, on the grounds of race, color, creed, sex, national origin, age, or handicap, be excluded from participating in, or denied the benefits of, or be subject to discrimination under any program, or activity receiving federal financial assistance.
- All HCTD management staff share in the responsibility to assure that all applicable EEO related laws and HCTD policy are followed. Performance by managers, supervisors, etc., will be evaluated on the success of the EEO program the same way as their performance on other HCTD goals. Successful achievement of EEO goals will provide benefits to all through fuller utilization and development of previously underutilized human resources.

DISSEMINATION

HCTD distributes information internally regarding equal employment opportunity through the HCTD Policy and Procedures Manual. All current employees have received a copy of the EEO Program and all new employees are provided a copy during new employee orientation, where it is discussed in detail. During management meetings, management staff is reminded of their responsibilities of the program's continued implementation. Nonsupervisory staff employees are reminded constantly of the EEO Program through both required and non-required EEO related posters on bulletin boards and break areas. The program is also discussed during employee meetings.

Externally, a copy of the EEO Program is available to anyone requesting a copy. A copy has been offered to the Texas Workforce Commission, which has declined except upon request. All advertising for employment contain the statement "Equal Opportunity Employer" (or EOE) and are written in a manner that will not discriminate. A statement of non-discrimination in employment is included on HCTD job application forms. The Policy Statement is posted on HCTD's website and printed copies are posted near office areas where employment applications are picked up and returned.

AFFIRMATIVE ACTION PLAN

I. Introduction

A. Policy Statement

The Board of Directors and the General Manager of Hill Country Transit District (hereinafter HCTD), pledge full commitment toward equality of employment. It is the policy of HCTD to provide fair and equal employment opportunities and client services to all persons: regardless of race, color, creed, sex, national origin, age, or handicap. HCTD's objective is to provide non-discriminatory practices in employment, as well as to any beneficiary of services regardless of race, color, creed, sex, national origin, age, or handicap. HCTD will provide reasonable accommodations for persons with disabilities. Therefore, HCTD will take affirmative action to ensure that it will abide by the following:

1. Recruit, hire, train, and promote persons in all job classifications without regard to race, color, creed, sex, national origin, age, or handicap.
2. Ensure that promotion decisions are in accord with principles of equal employment opportunity by imposing only those requirements for promotional opportunities that relate to job performance capability.
3. Ensure that all personnel policies and procedures such as compensation, benefits, transfers, layoffs, and training will be administered without regard to Recruit, hire, train, and promote persons in all job classifications without regard to race, color, creed, sex, national origin, age, or handicap.
4. Work continually toward improving recruitment, employment development and promotional opportunities for minority employees and women.
5. It is HCTD's policy that staff shall advocate for low-income persons in the area of civil rights.

B. HCTD - An Equal Opportunity Employer

1. Cooperation between administrative employees and participants is needed in order to achieve the goals of our Affirmative Action Plan (AAP). Therefore, HCTD has established and implemented affirmative procedures and practices that assure equitable employment and training opportunities for all persons.
2. The Equal Employment Opportunity Officer/Program Manager for HCTD has been designated to direct and monitor the implementation of personnel procedures to guide HCTD's AAP. The EEO Officer/Program Manager may be reached by telephone at (254) 933-3700 ext. 2004 and will report to the General Manager on EEO matters.

3. All administrative staff and operating staff are charged with the responsibility of ensuring that equal and fair judgment will be used to implement and maintain the AAP. Emphasis must be continuously directed toward achieving maximum utilization for all employees and program beneficiaries.
4. Responsible staff that fail to adhere to this policy are subject to immediate disciplinary action. The General Manager expects all employees to become familiar with the HCTD AAP and complaint procedures.
5. We support the concept of equal employment opportunity, and are committed to making every effort to see that every employee and applicant is treated equally. HCTD will continue to use just methods to recruit, hire, train, and retain employees in the future. HCTD will also maintain a uniform plan of evaluation and pay, based upon the relative duties and responsibilities of positions. HCTD is totally committed to provide the opportunity for all employees to perform at full capacity in accordance with their qualifications and interests.
6. With combined efforts of administrative employees and operating staff, we feel that HCTD will maintain its objective in obtaining equal opportunity for all persons. Employees of HCTD who fail to adhere to the AAP will be subject to disciplinary action.

II. Criteria for Selection/Designation of the Equal Employment Opportunity Officer/Program Manager)

1. Sensitivity to, and an awareness of, the varied ways in which discrimination occurs;
2. Total commitment to EEO program goals and objectives;
3. Knowledge of civil rights precepts, policies, rules, regulations, and guidelines; and
4. Sufficient authority and ability to work and communicate with others (e.g., department heads) to achieve EEO goals and objectives.

III. Responsibilities of the Equal Employment Opportunity Officer/Program Manager

The EEO Officer/Program Manager shall have the authority to carry out the following activities:

1. Develop and recommend EEO policy, a written EEO program, and internal and external communication procedure;
2. Assist management in collecting and analyzing employment data, identify problem areas, set goals and develop programs to achieve goals;

3. Design, implement, and monitor internal audit and reporting systems to measure program effectiveness and determine where progress has been made and where further action is needed;
4. Report periodically to the General Manager on progress of each unit in relation to the agency's goals;
5. Serve as liaison between the agency, Federal, State, and local governments, regulatory agencies, minority, handicapped and women's organizations, and other community groups;
6. Assure that legal information affecting affirmative action is disseminated to responsible officials;
7. Assist in recruiting minority, handicapped and women applicants and establishing outreach sources for use by hiring officials;
8. Concur with all hires and promotions; and
9. Process employment discrimination complaints.

III. Responsibilities of the General Manager

1. Assist in identifying problem areas and establishing agency and unit goals and objectives;
2. Be actively involved with local minority organizations, women's and handicapped groups, community action organizations and community service programs designed to promote EEO;
3. Participate actively in periodic audits of all aspects of employment in order to identify and to remove barriers obstructing the achievement of specified goals and objectives;
4. Hold regular discussions with other managers, supervisors, and employees to assure the agency's policies and procedures are being followed;
5. Review the qualifications of all employees to assure that minorities, handicapped persons, and women are given full opportunities for transfers, promotions, training, salary increases, and other forms of compensation;
6. Participate in the review and/or investigation of complaints alleging discrimination;
7. Conduct and support career counseling for all employees; and
8. Participate in periodic audits to ensure thatt each agency unit is in compliance (e.g., EEO posters are properly displayed on all employee bulletin boards).

VI. Authority

HCTD conforms to all applicable federal and state laws, rules, guidelines, regulations and executive orders and provides equal employment opportunity in all employment and employee relations. Such regulations include:

- Title VI of the Civil rights Act of 1964, as amended, which prohibits discrimination under any program or activity receiving federal financial assistance.

- Title VII of the Civil Rights Act of 1964, as amended, and its implementing regulations at 29 CFR Part 37 which prohibit discrimination based on race, color, religion, sex or national origin in any term, condition or privilege of employment.
- Section 504 of the Rehabilitation Act of 1973, as amended, which prohibits discrimination against qualified individuals on the basis of disability.
- Age Discrimination in Employment Act of 1967, as amended, which prohibits discrimination against individuals 40 years of age and older.
- Americans with Disabilities Act of 1990, as amended, which prohibits discrimination against qualified individuals with disabilities.
- Age Discrimination Act of 1975, as amended, which prohibits discrimination based on age in programs receiving federal financial assistance.
- Texas Commission on Human Rights Act, as amended, which prohibits discrimination in employment based on race, color, handicap, religion, sex, national origin, or age (40-70).
- Equal Pay Act of 1963, as amended, which requires equal pay for men and women performing substantially work.
- Pregnancy Discrimination Act of 1978 which prohibits discrimination against pregnant women.

VII. Discrimination Complaint Procedures

A. Informal Procedure

1. Local Complaint Procedures

Purpose: The purpose of the informal complaint process is to attempt to resolve and conciliate the complaint as soon as possible to the satisfaction of all the parties involved.

Who May File a Complaint: Any current employee or applicant for employment who feels that he/she has been denied an equal opportunity for employment or excluded from participating in or enjoying the benefits of HCTD, or representation in HCTD, because of race, color, creed, sex, religion, national origin, age, disability, handicap, or political affiliation or belief, may file a complaint.

How to File: Prior to filing a complaint, any current employee or applicant for employment should first consult with the EEO Officer/Program Manager for assistance.

When to File: A complainant must file a complaint within 180 calendar days of the date of the alleged act of discrimination.

Priority: Any complaint of discrimination shall take priority in the assigned duties of the EEO Officer/Program Manager. Once a complaint is filed, it must be acted upon immediately by the EEO Officer/Program Manager.

2. Submission of an Equal Opportunity Complaint

- a. A complainant should first file a complaint with the EEO of HCTD not more than 180 calendar days after the alleged act occurred.
- b. A complainant also has the right to file a complaint directly with Federal, State and local commissions with jurisdiction in the matter.
- c. A complainant may file a complaint with full knowledge that he/she will be free from any reprisals, threats, intimidation, coercion, or other forms of additional discrimination, because he/she filed a complaint, testified, assisted, or participated in any manner throughout the complaint process, and after the complaint shall be resolved. All matters pertaining to a complaint shall be treated confidentially by the EEO Officer/Program Manager and other HCTD personnel.

3. Resolution and Decision by HCTD

- a. The EEO Officer/Program Manager shall make every effort to resolve the complaint informally.
- b. HCTD shall give the EEO Officer/Program Manager any information necessary to resolve the complaint. This is to include access to HCTD files and records. The EEO Officer/Program Manager shall take other steps that may assist in the resolution of a problem, prior to filing of a formal complaint. These steps include:
 - + Gather documents
 - + Conduct interviews
 - + Conduct on-site visits
 - + Gather information specifying processes, criteria, personnel, etc.
 - + Gather statistical records, relevant comparative data, and forms
 - + Gather performance evaluation data
 - + Other data bearing on who, what, how, when, why.
- c. From the information above the EEO Officer/Program Manager will compile the case files, and then analyze the grounds of the complaint and the course of action.
- d. EEO Officer/Program Manager will attempt informal resolution with pertinent parties. This includes meetings, conferences and negotiation if necessary.

- e. HCTD's EEO Officer/Program Manager shall be granted the authority to carry out the following activities:
- (1) Receive and attempt to resolve complaints of discrimination.
 - (2) Explain and provide to the complainant, HCTD's approved discrimination compliant procedures.
 - (3) Provide complainant with information and advice on equal opportunity procedures including local, state, and federal redress procedures.
 - (4) Advise the complainant of the right to be accompanied, represented and advised by a representative or attorney of his/her choice and at the expense of the complainant. If the complainant or representative is an employee of HCTD, he/she shall be given a reasonable amount of working time to prepare and present his/her request for a resolution of the complaint.
 - (5) Have the complainant complete the following information on regular writing paper or HCTD A-13 Complaint of Discrimination Form:
 - Name, address, telephone number of complainant
 - Name address, telephone number of respondent (person being accused of alleged discrimination). If a person is not identified, then write in name of agency respondent.
 - Type of complaint
 - Application for Employment Discharge
 - Conditions of employment Participation
 - Promotion
 - Denial of benefits
 - Other
 - Cause of Complaint
 - Age
 - Color
 - Handicap
 - National Origin
 - Race
 - Creed
 - Sex
 - Describe what happened. Include the specific alleged acts of discrimination, by whom, when, and where.

- Identity of witnesses, if any. Ask complainant about his/her desired corrective actions in this matter.
- Get the complainant to sign and date.
- Secure permission from complainant to use his/her name when necessary in attempts to conciliate complaints.
- EEO Officer/Program Manager signs and dates this information form and provides the complainant with a copy.

(6) If requested by the complainant, the EEO Officer/Program Manager shall assist in discussions with any party to the complainant and may take other steps, if requested, which may assist in the resolution of the complaint.

The EEO Officer/Program Manager shall be assured by the General Manager that in carrying out his/her duty in attempting to resolve the complaint, that he/she will receive full cooperation from staff; and that he/she will be free from any reprisals, threats, coercion or intimidation.

4. Report on Efforts at Resolution

- a. When the EEO Officer/Program Manager has completed attempts to resolve the complaint, a report shall be prepared setting out:
 - (1) A summary of the complaint
 - (2) The preliminary inquiry, and
 - (3) The disposition of the complainant indicating the basis of that disposition.
- b. Copies of the above report should be classified confidential and shall be given to:
 - (1) The complainant
 - (2) General Manager
- c. If the informal complaint was not resolved satisfactorily for the complainant, he/she may pursue a formal complaint.

5. Time Frame for the Complaint Procedures

- a. 1 to 180 days – complaint of discrimination must be filed

- b. 10 days -informal complaint must be resolved within ten (10) working days by the EEO Officer/Program Manager and the results presented to the General Manager
- c. 10 days – within ten (10) working days after receipt of EEO Officer/Program Manager's report, the complainant may file a formal discrimination complaint.

B. Discrimination Complaint Procedure - Formal

1. HCTD Complaint Procedure

If the result of the informal discrimination complaint procedures is unsatisfactory to the complainant, a formal complaint may be taken. This requires that the complainant file the complaint with the Texas Workforce Commission, Civil Rights Division. The Texas Workforce Commission, Civil Rights Division will conduct the investigation of the complaint from that point. This Commission will also inform the appropriate office of the Equal Employment Opportunity Commission (EEOC) of the complaint.

The complaint may also be filed with the Federal Transit Administration, Office of Civil Rights.

Director, Office of Civil Rights
Federal Transit Administration
East Building, 5th Floor - TCR
1200 New Jersey Ave., SE
Washington, DC 20590

- 2. Both HCTD and the complainant will be advised by outside agencies of their responsibilities in assisting with the case.
- 3. Outside agencies will advise HCTD, the complainant, and EEOC of its decision.
- 4. Outside agencies will specify the time frame for all steps in the resolution of the complaint.

VIII. Intimidation

HCTD shall not intimidate, retaliate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege granted by Civil Rights Laws and Regulations. HCTD shall not intimidate, retaliate, threaten, coerce, or discriminate against any individual because he/she has filed a complaint, testified, assisted, or participated in any manner in any investigation, proceeding or hearing relating to discriminatory practices. The identity of all complainants must be kept confidential, except to the extent needed to resolve the complaint.

American's with Disabilities Act (ADA) Compliance Plan

I. Introduction

A. Policy Statement

The General Manager of Hill Country Transit District pledges the district's full commitment toward compliance with all aspects of the goals and objectives of the Americans with Disabilities Act (ADA). It is the policy of HCTD to provide fair and equal employment opportunities to persons with disabilities, to provide access to services of the district, and to make reasonable accommodation to ensure a person with disabilities is not discriminated against.

B. Compliance Plan

HCTD will take the following actions:

- 1) Make reasonable accommodations for the applicant or employee with disabilities.
- 2) Ensure that all promotions are based solely on job performance.
- 3) Ensure that all sites/offices are accessible to persons with disabilities.
- 4) Ensure that the transportation system has vehicles equipped to transport the disabled passenger.
- 5) Ensure that staff is trained in techniques for assisting clients with disabilities.
- 6) It is HCTD's policy that its staff shall advocate for persons with disabilities in the area of non-discrimination. In addition, HCTD will try to ensure that all contractors, vendors and suppliers will provide equal opportunities to persons with disabilities.

II. Administration of Compliance Plan

The Equal Employment Opportunity Officer/Program Manager for HCTD has been designated to direct and monitor the implementation of personnel procedures to guide HCTD's ADA compliance. The EEO Officer/Program Manager may be reached by telephone at (254) 933-3700 ext. 2004 and will report to the General Manager on *ADA* matters.

All staff are charged with the responsibility of ensuring that equal and fair judgment will be used to implement the *ADA* compliance plan. Emphasis must be continuously directed toward improving and enhancing the opportunities HCTD offers in terms of employment and services for the person with disabilities. Responsible staff that fails to adhere to this policy is subject to immediate disciplinary action. The General Manager expects that all staff become familiar with the district's

ADA policy and complaint procedures. All managers and supervisors are charged with actively implementing policy.

III. Reasonable Accommodation

It is the policy of Hill Country Transit District to provide reasonable accommodations for qualified, disabled, individuals who are employees, or applicants for employment. Hill Country Transit District will adhere to all applicable federal, state, and local laws, regulations, and guidelines with respect to providing reasonable accommodations as required to afford equal employment opportunity to qualified, disabled individuals. Reasonable accommodations shall be provided in a timely and cost-effective manner.

Definitions:

Disabled individual: Any person who has, or who has acquired, a physical or mental impairment which limits one or more major life activities, such as self-care, performing manual tasks, seeing, hearing, speaking, breathing, and working on a temporary or permanent basis.

Physical or mental impairment: Any physiological disorder, disfigurement, or anatomical loss or limitation or any mental or psychological disorder acquired as a result of illness, accident or birth.

Qualified disabled individual: A disabled individual whose experience, education, and/or training enable the person with reasonable accommodation to perform the essential functions of the job.

Reasonable accommodation: The effect made to make adjustments for the impairment of an employee or applicant by structuring the job or the work environment in a manner that will enable the disabled individual to perform the essential function of the job. Reasonable accommodation includes, but is not limited to, modifying written examinations, making facilities accessible, adjusting work schedules, and restructuring jobs, providing assistive devices or equipment, providing readers or interpreters, and modifying work sites.

- The EEO Officer/Program Manager, the Director of Human Resources, and other management staff will prepare an analysis of jobs that include defining the essential functional elements or tasks, as well as the environment in which such activities occur. Job Descriptions shall be written which will reflect the essential functions and minimum requirements of each position.
- In considering a disabled individual for employment or for promotion or in any personnel action, the existence of their disabling condition should not adversely affect a personnel decision. Employment opportunities shall not be denied to anyone because of the need to make reasonable accommodation to the individual's disability; however, it is appropriate to determine the ability of the person to perform the essential functions of the job with reasonable accommodation. A request for medical verification of the disability of the person requesting the accommodation may be appropriate.
- The General Manager shall have the authority to make reasonable accommodations for applicants or employees that do not exceed a one-time cost of \$1000. Any amount needed

above this would require approval from the Board of Directors and would be considered on a case by case basis.

- If the employee wishes to challenge a decision of the General Manager or the Board of Directors, he/she should have access to and follow the grievance procedures outlined in Hill Country Transit District policies.
- An employee and his/her supervisor should periodically monitor the effectiveness of the accommodation.
- Disabled individuals shall be afforded the opportunity to provide reasonable accommodations for themselves if the accommodation required would impose undue hardship on Hill Country Transit District. The disabled individual shall not be afforded the opportunity to make accommodations which effect a temporary or permanent change to the facilities of the institution or which involve restructuring of the job in question without the written consent of the General Manager.

Section 504 Grievance Procedure

For Participants, Visitors and Employees

Hill Country Transit District has adopted an internal grievance procedure providing for prompt and equitable resolutions of complaints alleging any action prohibited by the regulations of the U. S. Department of Health and Human Services, 45 CFR Part 84, implementing Section 504 of the Rehabilitation Act of 1973 as amended, 29 USC 794 (hereinafter Section 504).

Section 504 states in part: "No otherwise qualified individual... shall, solely by reason of his handicap, be excluded from participation in, be denied the benefit of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

The law and regulation may be examined in the HCTD administrative office located at 906 S. High, San Saba, TX 76877, telephone number (325) 372-4677.

1. A complaint should be filed in the office of the Section 504 Coordinator within a reasonable time after the person filing the complaint becomes aware of the action alleged to be prohibited by the regulation.
2. A complaint may be filed in writing or verbally; it should contain the name and address of the person filing it and briefly describe the action alleged to be prohibited by the regulation.
3. The HCTD Section 504 Coordinator shall conduct such investigation of a complaint as may be appropriate to determine its validity. These rules contemplate informal but thorough investigations, affording all interested persons and their representatives, if any, an opportunity to submit evidence relevant to the complaint.
4. The HCTD Section 504 Coordinator shall issue a written decision determining the validity of the complaint no later than thirty (30) days after its filing.
5. The Section HCTD 504 Coordinator shall maintain the files and records relating to complaints filed hereunder. The HCTD Section 504 Coordinator may assist persons with the preparation and filing of complaints and advise the HCTD General Manager concerning their resolution.
6. The right of a person to prompt and equitable resolution of the complaint filed hereunder shall not be impaired by the person's pursuit of other remedies such as the filing of a Section 504 complaint with the Office of Civil Rights of the U. S. Department of Health and Human Services. Utilization of the grievance procedure is not a prerequisite to the pursuit of other remedies.
7. Determinations made under these procedures shall be liberally constructed to protect the substantial rights of interested persons, to meet appropriate due process standards and to assure the compliance of HCTD services with Section 504 and the implementing regulation.

Auxiliary Aids

General Information

All participants/ clients will be afforded equal access to services provided by HCTD. Staff will ensure effective communication with persons with impaired sensory, manual or speaking skills.

If necessary, HCTD will arrange for a qualified sign-language interpreter or utilize other auxiliary aids.

"Relay Texas", a telecommunication service established for the sensory impaired by the 71st Texas Legislature in 1989, allows an individual to make and receive calls from anywhere in the United States.

Family members will be used as interpreters only when consent has been given by the individual participant/ client.

Information concerning the availability of qualified sign-language interpreters in the service area and how to contact them will be obtained from the Texas Rehabilitation Commission offices in the area.

Braille

The Braille Services (210-370-5679) located in San Antonio, TX does text conversion.

Lighthouse for the Blind (210-533-5195) located in San Antonio, TX does text conversion.

Large Print

For individuals with limited sight, large print material may be acceptable. Large print documents will be produced by HCTD.

Audio Tape

For individuals who are blind or have limited sight, an audio tape of any printed material may be acceptable. Audio tapes will be produced by HCTD.

What is Relay Texas and How Does it Work?

General Information

Relay Texas

Relay Texas provides telephone interpreting service between people who can hear and those who are deaf, hard-of-hearing, deaf-blind or speech-disabled. Relay Texas agents have computers that enable them to hear the voice user as well as read the signals from the TTY user.

The service is available for Texans 24 hours a day, 365 days a year. There are no restrictions imposed on Relay Texas calls. Confidentiality for relay users and operators is assured by Texas law.

Telecommunication Device for the Deaf (TTY)

A TTY is a typewriter-like device with a small display which attaches easily to a standard telephone or can be plugged directly into a telephone jack. Using a TTY, a person who is deaf is able to call another person with a TTY. Deaf persons use a TTY to call Relay Texas to make a call to a hearing person who does not have a TTY.

Procedure of TRS

The Relay Texas Center has over 250 relay agents that can accept calls from both TTY users and non-TTY users (hearing persons who do not have TTY machines) at the same time. Example: you (voice user) call 1-800-735-2989 on your telephone and a relay agent will answer. Give the agent the phone number of the deaf person, and the agent will dial the number. The agent will act as a translator between you and the deaf person. Talk directly to the deaf person and pretend the relay agent is not there. The relay communication is thus carried out by both parties.

Cost to the Relay User

Relay Texas allows you to place local calls at no charge. Long distance calls within Texas are priced at rates lower than the usual rate, if the contracted carrier is used for billing.

How Do Relay Services Benefit Society?

Business Opportunities

Relay services increase business opportunities by greatly enhancing accessibility to a new and largely untapped consumer market, thus increasing potential business revenues and collectable state tax dollars.

Increased Employability

Relay services increase the employability of disabled persons. Previously, many deaf individuals could not get certain jobs because they could not use the telephone. Relay services increase employment and promotional opportunities for both unemployed and currently employed individuals. By increasing these employment opportunities, relay services reduce welfare costs and increase the tax base.

Enhanced Quality of Life

Relay services improve the quality of life for all citizens by:

- Ensuring ongoing telephone access for everyone;
- Increasing freedom and independence;
- Increasing privacy;
- Increasing performance and productivity;
- Improving self-image;
- Improving safety and security.

Real-life Examples of How Relay Services Help the Relay Users Who are Deaf, Hard-of-Hearing, Deaf-Blind, and Speech-Disabled.

Relay Service Increases Freedom...

- Calling about a job ad in the paper.

- Ordering a prescription refill at the drugstore.
- Setting up appointments with professional service providers.
- Calling legislators to encourage support for pending legislation.

Relay Service Increases Privacy...

- Calling the doctor's office for test results.
- Calling the IRS for questions about tax returns.
- Calling a lawyer to discuss legal matters.

Relay Service Increases Independence ...

- Eliminates relying on friends, co-workers, or family, to make calls.
- Students can call other students to go over homework.
- Consumers can make credit card purchases from catalogs, stores, etc.

Relay Service Increases the Desire to Succeed...

- A technician calls the office to check on parts availability.
- A contractor calls clients before going to the job site, avoiding wasted trips.
- Professionals can confer with other professionals.

Relay Service is for Hearing People, too...

- A teacher needs to advise the deaf parents of their child's performance.
- Family, business associates and friends are able to keep in contact, without buying a TTY.
- People can be guaranteed ongoing telecommunication access in the event hearing impairment results from aging or injury.
- Over 15% of Relay Texas calls are initiated by hearing persons.

Relay Texas Telephone Numbers.

To use Relay Texas:

Non-TTY Users (hearing persons) 1-800-735-2988

TTY Users (deaf, or speech-impaired) 1-800-735-2989

ASCII Users (deaf, or speech-impaired) 1-800-735-2991

VCO users (hard-of-hearing), use your own voice 1-877-VCOIRTX

Additional Information.

For additional information, please contact the contracted carrier:

Sprint: 1-800-676-3777 (TTY/Voice/ ASCII/VCO/HCO)

Email: Sprint.TRSCustServ@sprint.com - or

Public Utility Commission of Texas

Relay Texas Program

512 936-7147 (TTY)

512 936-7132 (Voice)

866-759-1606 (Videophone)

relaytx@puc.state.tx.us

FAX 512 936-7428

OTHER USEFUL CONTACT INFORMATION

Texas Rehabilitation Commission
2416 S. Lamar Blvd., Suite A
Austin, TX 78704
(512) 383-7080
(888) 877-8086
Fax: (512) 451-9029

Texas Workforce Commission /
Division for Blind Services
4800 N. Lamar Blvd.
Austin, Texas 78756-3178
(800) 628-5115

Best Program: Division of Texas Health and Human
Services
701 W. 51st Street
Austin, TX 78751
(512) 438-2447

Addendum A

Board Appointment of
Equal Employment Opportunity Program Manager
&
504 Coordinator

**HILL COUNTRY TRANSIT DISTRICT
BOARD OF DIRECTORS RESOLUTION**

STATE OF TEXAS

COUNTY OF BELL

On the 20th day of August, 2015, at a meeting of the Board of Directors of Hill Country Transit District, held in the city of Belton, Bell County, with a quorum of the Directors present, the following business was conducted:

It was duly moved and seconded that the following Resolution be adopted:

BE IT RESOLVED that the Board of Directors of the above District do hereby appoint Ololade Hernandez as the Equal Employment Opportunity Officer Program Manager for the District and designate her to coordinate the efforts of Hill Country Transit District to comply with the Civil Rights requirements of the Equal Employment Opportunity Commission, and its Affirmative Action requirements regarding discrimination complaints as so stated in the Affirmative Action Plan.

The above resolution was passed by a majority of those present and voting in accordance with the By-Laws.

I certify that the above and foregoing constitutes a true and correct copy of a part of the minutes of a meeting of the Board of Directors of Hill Country Transit District held on the 20th day of August, 2015.

Chair

Subscribed and sworn to before me, _____, a Notary Public for the State of Texas on the 20th day of August, 2015.

Notary Public

State of Texas

Signature: _____

**HILL COUNTRY TRANSIT DISTRICT
BOARD OF DIRECTORS RESOLUTION**

STATE OF TEXAS

COUNTY OF BELL

On the **20th day of August, 2015**, at a meeting of the Board of Directors of Hill Country Transit District, held in the city of Belton, Bell County, with a quorum of the Directors present, the following business was conducted:

It was duly moved and seconded that the following Resolution be adopted:

BE IT RESOLVED that the Board of Directors of the above District do hereby appoint Ololade Herandez as the Section 504 Coordinator for the District and designate her to coordinate the efforts of Hill Country Transit District to comply with the regulation of the U. S. Department of Health and Human Services, 45 CFR Part 84, implementing Section 504 of the Rehabilitation Act of 1973 as amended 29 U. S. C. 794.

The above resolution was passed by a majority of those present and voting in accordance with the By-Laws.

I certify that the above and foregoing constitutes a true and correct copy of a part of the minutes of a meeting of the Board of Directors of Hill Country Transit District held on the **20th day of August, 2015**.

Chair

Subscribed and sworn to before me, _____, a Notary Public for the State of Texas on the **20th day of August, 2015**.

Notary Public

State of Texas

Signature: _____

Addendum B

Complaint of Discrimination Form

HILL COUNTRY TRANSIT DISTRICT

COMPLAINT OF DISCRIMINATION

BECAUSE OF RACE, COLOR, RELIGION, SEX, NATIONAL ORIGIN, AGE, HANDICAP, Reprisal or Sexual Orientation
(Please Type or Print)

1. WHAT IS YOUR (COMPLAINANT'S) FULL NAME

2. WHAT IS YOUR TELEPHONE NO.?
(Including Area Code)

YOUR STREET ADDRESS *(or RD Number of Post Office Box Number)*

HOME PHONE

YOUR CITY

STATE

ZIP CODE

WORK PHONE

3. NAME OF PERSON YOU BELIEVE DISCRIMINATED AGAINST YOU? *(Prepare a separate complaint form for each person which you believe discriminated against you)*

4. ARE YOU NOW WORKING FOR HILL COUNTRY TRANSIT DISTRICT?

____ YES)

____ NO

5. DATE ON WHICH MOST RECENT ALLEGED DISCRIMINATION TOOK PLACE

MONTH DAY YEAR

6. CHECK BELOW WHY YOU BELIEVE YOU WERE DISCRIMINATED AGAINST

- ____ RACE, IF SO, STATE YOUR RACE _____
- ____ COLOR, IF SO STATE YOUR COLOR _____
- ____ RELIGION, IF SO, STATE YOUR RELIGION _____
- ____ NATIONAL ORIGIN, IF SO, STATE YOUR NATIONAL ORIGIN _____
- ____ SEX, IF SO, STATE YOUR SEX _____
- ____ AGE, IF SO, STATE YOUR AGE _____
- ____ HANDICAP, IF SO, STATE YOUR HANDICAP _____
- ____ REPRISAL _____
- ____ SEXUAL ORIENTATION _____

7. EXPLAIN HOW YOU BELIEVE YOU WERE DISCRIMINATED AGAINST (TREATED DIFFERENTLY FROM OTHER EMPLOYEES OR APPLICANTS) BECAUSE OF YOUR RACE, COLOR, RELIGION, SEX, NATIONAL ORIGIN, AGE, HANDICAP OR SEXUAL ORIENTATION. *(For each allegation, please state to the best of your knowledge, information and belief, what incident occurred and when the incident occurred.)*
(Continue on reverse of form or add additional sheets.)

(Continuation of Statement)

8. I HAVE DISCUSSED MY COMPLAINT WITH A SUPERVISOR

___ YES ___ NO

a. NAME OF SUPERVISOR

9. WHAT CORRECTIVE ACTION ARE YOU SEEKING?

10. DATE OF THIS COMPLAINT (*Month, Day, Year*)

11. SIGN YOUR (COMPLAINANT'S) NAME HERE

(ATTACHMENT TO "COMPLAINT OF DISCRIMINATION" FORM)

PRIVACY ACT STATEMENT

Principle Purpose: Formal filing of allegation of discrimination because of race, color, religion, sex, handicap, age, national origin, or reprisal.

Routine Uses: This form and the information on this may be used as a data source for complaint information.

Disclosure: Voluntary, however, failure to complete all appropriate portions of this form may lead to rejection of complaint on the basis of inadequate data on which to determine if complaint is acceptable.

Addendum C

Assessment of Employment Practices

HCTD began collecting statistical data effective June 1, 2011 in the areas of employment applications, disciplinary actions, terminations, transfers, and promotions.

Assessment of Employment Practices

HCTD conducts annually or whenever needed an assessment of employment practices to identify those practices that might operate as employment barriers and unjustifiably contribute to underutilization. Any potential problem areas are identified and affirmative actions taken to eliminate or correct those problem areas. This assessment will follow the guidance provided in FTA Circular 4704.1 and will evaluate the impact of HCTD's employment practices on all of its employment patterns including recruitment, selection, promotion, termination, transfer, layoff, disciplinary action, compensation and benefits, training, etc. A narrative description and analysis of these areas are provided below:

- 1) Applications for employment are accepted when a position is vacant. Unsolicited applications will also be accepted. HCTD's Employment Application is the only document authorized for applying for employment. Resumes may be accepted with HCTD's Employment Application. The application must have all sections completed to be considered.
- 2) All vacancies are advertised internally, in the local newspaper, with the Texas Workforce Commission, and Application Pro (Advertising on 23 employment internet websites). Interview procedures/questions will be the same for all applicants interviewed. Selection criteria will be the job description requirements as advertised in the job posting. No written, formal, or scored tests are used in the employment selection process. Priority in selection consideration will be given to current employees; however, it is management's policy to select the most qualified applicant to fill all HCTD positions. If a current employee is selected to fill a vacant position at a different geographical location than currently assigned, relocation or commuting expenses are the employee's responsibilities. The General Manager, as set forth by policy, is the hiring authority. Employment is at-will. (The Director of Human Resources maintains all Job Descriptions.)
- 3) Entry level salaries for all positions are reviewed and set by the General Manager. Salary determinations are based on availability of funding and competitiveness within the local labor market. Salary increases for all staff is based upon the availability of funding. These increases are recommended by the General Manager to the Board of Directors for approval. Traditionally, these salary increases are made annually and across the board for all staff.
- 4) Disciplinary procedures are outlined in HCTD's Corrective & Disciplinary Policy. This written policy assures that all disciplinary action is fair and consistent. The General Manager approves all disciplinary action and, as set forth by policy, is the firing authority.

These employment practices have been reviewed and will continue to be reviewed to ensure that there is no adverse impact on the employment of minorities or women.

HCTD has performed a Utilization Analysis, consisting of a Workforce Analysis (see Addendum E) and an Availability Analysis as provided for in FTA Circular 4704.1. The analysis utilized data obtained from the Texas Workforce Commission (see Addendum E). This Utilization Analysis indicated that HCTD was in compliance with acceptable employment guidelines and that all employment practices would continue to be monitored. Therefore, no short-term or long-range goals need to be set at this time.

HCTD's anticipated workforce is projected to remain constant with no plans to significantly increase or decrease the number of employees. Also, the make-up of the workforce is anticipated to remain constant based on available demographic data.

Hiring Procedures

Recruitment

HCTD uses one or more of the following methods to advertise job vacancies: Texas Workforce Commission, local newspaper classifieds, internal job posting memo, and on Internet job posting websites.

Application Process

Applications for employment are accepted when a position is vacant. Unsolicited applications will also be accepted. HCTD's Employment Application is the only document authorized for applying for employment. Resumes may be accepted with HCTD's Employment Application. The application must have all sections completed to be considered.

Interview procedures/ questions will be the same for all applicants interviewed. Selection criteria will be the job description requirements as advertised in the job posting. No written, formal, or scored tests are used in the employment selection process, with the exception being a computer knowledge test for positions requiring extensive computer experience. Priority in selection consideration will be given to current employees; however, it is management's policy to select the most qualified applicant to fill all HCTD positions. If a current employee is selected to fill a vacant position at a different geographical location than currently assigned, relocation or commuting expenses are the employee's responsibilities. The General Manager, as set forth by policy, is the hiring authority. Employment is at-will. (The Director of Human Resources maintains all Job Descriptions.)

Compensation

Entry level salaries for all positions are reviewed and set by the General Manager. Salary determinations are based on availability of funding and competitiveness within the local labor market. Salary increases for all staff is based upon the availability of funding. These increases are recommended by the General Manager to the Board of Directors for approval. Traditionally, these salary increases are made annually and across the board for all staff.

Minimum Qualifications

Depending on the position, the following are minimum qualifications to be hired: must have or be able to obtain a Commercial Driver's License (CDL), pass a DOT physical exam, pass a criminal records check, and receive a negative result on a DOT pre-employment drug test.

Addendum D

Workforce Analysis

Hill Country Transit District

EEO I

Hire Date From 1/1/1800 12:00:00 AM to
12/31/2099 12:00:00 AM

Section D - EMPLOYMENT DATA

Employment at this establishment - Report all permanent full- and part-time employes including apprentices and on-the-job trainees unless specifically excluded as set forth in the instructions. Enter the appropriate figures on all lines and in all columns. Blank spaces will be considered as zeros.

Job Categories	Number of Employees(Report employees in only one category)															Total Col A - N
	Race/Ethnicity															
	Hispanic or Latino		Not-Hispanic or Latino													
			Male						Female							
	Male	Female	White	Black or African American	Native Hawaiian or Other Pacific Islander	Asian	American Indian or Alaska Native	Two or more races	White	Black or African American	Native Hawaiian or Other Pacific Islander	Asian	American Indian or Alaska Native	Two or more races		
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	
Executive/Senior Level Officials and ^{1.1}	1	0	4	0	0	1	0	0	1	1	0	0	0	1	9	
First/Mid-Level Officials and Manag ^{1.2}	1	0	2	5	0	0	0	1	1	0	0	0	0	1	11	
Technicians ³	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1	
Administrative Support Workes ⁵	0	5	3	2	0	0	0	0	15	4	0	0	0	3	32	
Craft Workers ⁶	2	1	5	0	0	0	0	0	0	0	0	0	0	0	8	
Operatives ⁷	9	13	18	26	0	0	1	1	12	18	1	0	0	1	100	
Laborers and Helpes ⁸	0	0	3	2	0	0	0	1	0	0	0	0	0	0	6	
TOTAL	13	19	36	35	0	1	1	3	29	23	1	0	0	6	167	

Addendum E

Analysis Resource Data

HCTD began collecting statistical data effective June 1, 2011 in the areas of employment applications, terminations, transfers, and promotions.

The U.S. Census Bureau's EEO Report ACS Demographic and Housing estimates 2017 - 2021. Occupational Groups by Sex, and Race/Ethnicity for Residence Geography, Total Population was used to determine employment availability data.

Insert the US census data (age/sex and ethnic)

Addendum F

Goals and Timetables

In developing goals and timetables to correct underutilization, HCTD will use the following guidelines for goal setting:

1. Involve personnel staff and division heads in the process;
2. Set goals that are significant, measurable, and attainable;
3. Make goals with timetables specific for planned results;
4. Consider anticipated attrition, expansion, turnover in the workforce, and availability of persons with required skills;
5. Consider effects of changes in existing employment practices that may contribute to underutilization in increasing availability of minorities and women; and
6. Goals should not be rigid and inflexible, but must be targets reasonably attainable by applying every good faith effort to make all aspects of the affirmative action program work.

The monitoring and reporting system will be utilized to prescribe and revise short-term goals. The system will allow for revision of long-range goals to reflect the availability of traditionally underutilized persons.

HCTD will analyze in detail all employment practices relating to recruitment, selection, salaries, promotions, terminations, standards of discipline, etc. All problems will be noted and a proposed course of remedial action will be enumerated in HCTD's EEO program

HCTD has determined that the company currently falls within acceptable utilization criteria and will set long term goals and timetables as of this time; however, HCTD will continue to monitor all analysis as more data is collected.

Insert Utilization chart

Addendum G

Monitoring and Reporting

An important part of HCTD's EEO program is the establishment of an effective and workable internal monitoring and reporting system. This system serves the following basic purposes:

1. Assessing EEO accomplishments by providing feedback on program progress;
2. Enabling HCTD to evaluate the EEO program during the year to take any necessary corrective action regarding the development and execution of program goals and timetables;
3. Identifying those units which have failed to achieve a goal or implement affirmative action; and
4. Providing a precise and factual data base for future projections.

The reporting system provides documentation to support actions that affect minority and women job applicants or employees. Cumulative records on hiring, training transfer and promotions in areas of under participation are maintained and summarized by the EEO Officer/Program Manager. Reports are submitted to the General Manager and other supervisory/management staff at monthly management meetings.

EEO complaints are tracked using the Record of EEO Complaints, Investigations, and Lawsuits form by the EEO Officer/Program Manager. (See Addendum H)

HCTD does not list procedures for monitoring subcontractors as HCTD does not have subcontractors.

Addendum H

Record of EEO Complaints, Investigations, and Lawsuits Form

There have been no EEO complaints, investigations, or lawsuits since the last program submission.

Hill Country Transit District

Record of EEO Investigations, Complaints, and Lawsuits

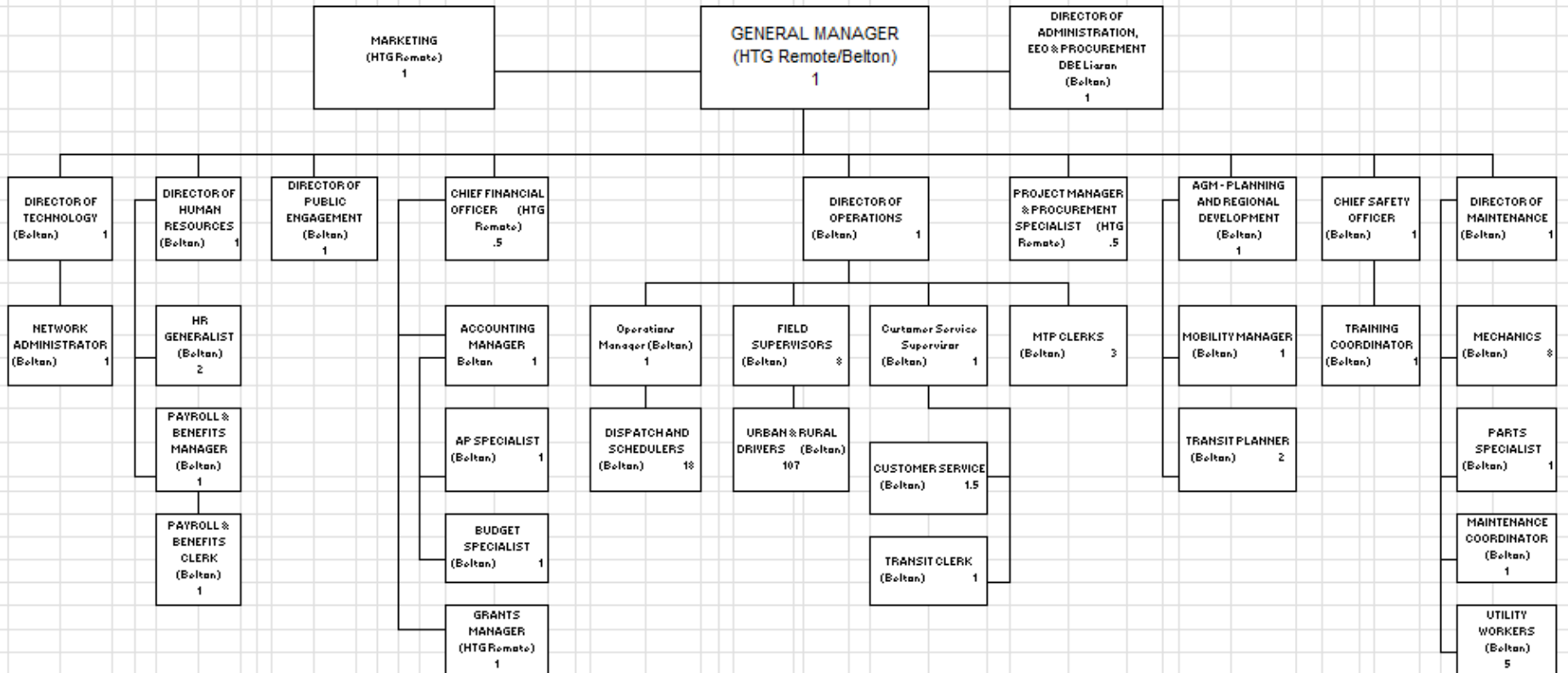
Date of Investigation. Lawsuit. Complaint: _____

Summary of Allegation(s): _____

Actions taken by HCTD: _____

Addendum I HCTD Organizational Chart

Organizational Chart



*DBE Liason has direct and independent access to General Manager

Key

Position (Location)
Employee Count