Revisiting MCTS Workforce Diversity: While the Road to Racial and Gender Equity Remains, Progress Has Been Made.

August 2020

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To the Honorable Chairwoman
of the Board of Supervisors
of the County of Milwaukee

August 6, 2020

We have completed an audit, *Revisiting MCTS Workforce Diversity: While the Road to Racial and Gender Equity Remains, Progress Has Been Made.* A response from the Milwaukee County Transit System is attached as **Exhibit 2**. We greatly appreciated the cooperation extended by management and staff of MCTS during the course of this audit.

Our report provides a look at the current workforce demographics at MCTS through a racial and gender equity lens. We looked at the employee data both with operators and without to ensure the large number of operators did not obscure the data. Our analysis included data from the Human Resources system at MCTS and primarily focused on data from 2019 but additional review of some areas included data from 2018.

We found the staff to be more diverse in 2019 compared to a prior audit we released in 2017. The variance to the overall County population based on Census estimates was most pronounced for the Black or African American racial group which was 58% of the overall workforce and 25% of the non-operator workforce and the white racial group which was 33% of the overall workforce and 61% of the non-operator workforce. Females are 38% of the overall workforce and 23% of the non-operator workforce. Only two racial groups earned in excess of the average salary in 2019. Hiring data showed the white racial group was the only group hired at a rate lower than its percentage of the overall workforce. Females were 44% of all hires and 14% of non-operator hires. All of the females who were hired for non-operator positions were from the white racial group. MCTS has not begun the recommended mentoring program from the 2017 audit and the required review of hiring for bias and barriers did not occur in the 12 requisition files we reviewed.

We made six recommendations that we believe will help MCTS address the issues raised in the report.

Please refer this report to the Audit Committee.

Jennifer L. Folliard

Jennifer L. Folliard
Director of Audits

JLF/mrp

Attachment

cc: Scott B. Manske, CPA, Milwaukee County Comptroller
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Steve Cady, Research & Policy Director, Office of the Comptroller
Janelle Jenson, Legislative Services Division Manager, Office of the Milwaukee County Clerk

ASD Highlights

Why We Did This Audit

In June of 2017, we published an audit report titled, "*Improvements Needed to Strengthen Milwaukee County Transit System's (MCTS) Commitment to Workforce Diversity*." Our prior audit remained open with outstanding recommendations. Due to an expressed interest by the County Board, the age of the data used in the prior audit and an increased emphasis at the County on racial equity, it was determined that a revisit of employee data from MCTS might provide additional information and a path to closure of the prior audit. Going forward, we will consolidate our follow up on recommendations contained in this audit.

What We Recommend

ASD made six recommendations that, if implemented, will address the issues raised in the audit. MCTS management accepted all of our recommendations. Key items include:

- *Develop and document new strategies for recruitment and hiring that are focused on encouraging additional female applicants, especially females of color. Work with hiring managers to target recruitment of more female applicants. Establish a system to monitor effectiveness.*
- *MCTS should provide annual training to hiring managers within the job classifications that are currently underrepresented on how to diversify its staff. Include additional training on its Equal Employment Opportunity plan.*
- *Immediately implement the Mentoring Program at the agency and increase efforts for participation by increasing awareness of the program and its benefits at the agency. Create a plan to share success stories with staff.*
- *Update the Recruitment and Selection Policy to identify goals for the diversity of various steps within the hiring process such as interview panels and scoping meetings. Implement an internal control system to review adherence to the diversity goals.*
- *Immediately implement the review of barriers to employment with job descriptions and the review of the hiring process to identify possible areas of bias and identifying unsuccessful internal candidates as required under the Selection and Recruitment Policy. Implement an internal control system to document compliance with the policy.*
- *Become familiar with the GARE toolkit recommendations and develop an appropriate toolkit for implementation at MCTS.*

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BACKGROUND

Beginning in 1975, Milwaukee County provided mass public transit services under contract with a privately-owned nonprofit corporation, Milwaukee Transport Services (MTS). In 2014, MTS transitioned to operation as a quasi-governmental instrumentality of Milwaukee County. It manages and operates both the Milwaukee County Transit System (MCTS) and its Paratransit services. It fulfills its transit function with a fleet of 348 buses, operating over 17 million bus miles annually and serving over 27 million passengers. In 2017, we released an audit of MCTS's workforce diversity. Some recommendations remain open and due to an increased focus on racial equity at Milwaukee County it was determined that a revisit of employee data from MCTS would be appropriate.

OVERALL OBJECTIVE

The objective of the audit was to provide an overview of MCTS staff from a racial and gender equity view and to provide a path forward to close outstanding items from our 2017 audit. We conducted a review of employee data from January 1, 2018 to December 31, 2019. We pulled concepts from prior audits including any recommendations. We used the employee data to analyze multiple demographics of MCTS's employees.

WHAT WE FOUND

- We found the staff to be more diverse in 2019 compared to the prior audit issued in 2017.
- We choose to analyze employee data both with and without operators in part based upon recommendations of the Government Alliance on Race and Equity that found that examining overall gross numbers using large groups of job classifications and racial groups may obscure the results. The removal of operators from the analysis of the distribution of racial groups changes the two largest racial groups' share of the workforce. The Black or African American racial group drops from 58% of the workforce to 25% while the white racial group increases from 33% to 61%. Operators are 70% of MCTS workforce.
- Females are 38% of the overall workforce and 23% of non-operators. The chart below shows the breakdown by racial group for both males and females without operators.
- Only two racial groups, Asian and white, earned in excess of the average salary of $54,585 in 2019.
- When analyzing salary data, we found the Black or African American racial group share of the workforce dropped as income increased while the white racial group share increased.
- For the top 100 earners, the Black or African American racial group exceeded their Census percentage but fell below their workforce percentage while the white racial group exceeded both their Census percentage and their overall workforce percentage.
- Female representation is 57% at the lowest salary set and 18% at the top salary set. Of the top 100 earners 27 were female.
- White females had the second highest average income and were the only racial group where females earned more than males.
- We found that Black or African American females were 46% of the lowest salary set and 7% of the highest salary set. White males were 8% of the lowest set and 52% of the highest set. Of the top 100 earners, there were no females from the Asian, Hispanic or Two or more races racial groups.
- Hiring data showed the white racial group was the only group hired at a rate lower than its percentage of the overall workforce. Females were 44% of all hires and 14% of non-operator hires. All of the females who were hired for non-operators were from the white racial group.
- For staff without operators analyzing the net difference between hires and separations showed that female employees decreased by seven while male employees increased by six.
- Promotions showed that 29% were female and 40% were Black or African American employees.
- MCTS has not begun the recommended mentoring program from the 2017 audit and the required review of hiring for bias and barriers did not occur in the 12 files we reviewed.
- Participation in the scoping meetings and interview panels are not as diverse as MCTS's staff.

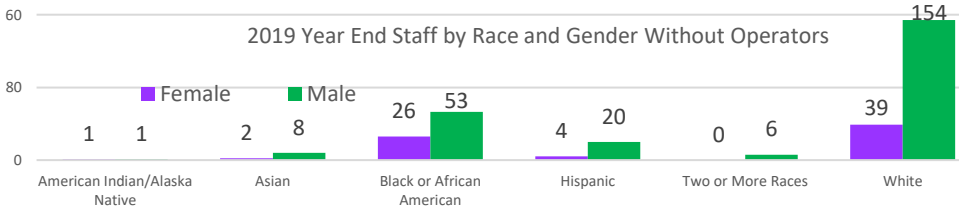

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Table of Contents Page

Summary 1

Background 13

Section 1: While the diversity of staff has improved since our prior audit, there is still variance to Census estimates. Once operators are removed, the white racial group is the only group in excess of Census estimates. Gender disparity remains.....18

Section 2: We found variances in average salaries for both race and gender at MCTS with a greater disparity occurring as pay increases.....33

Section 3: A review of policies and procedures and numerous field interviews along with an analysis of hiring and separations by race and gender show positive developments when looking simply by race but issues remain when looking at gender 44

Section 4: A detailed review of selected personnel hiring files from January 1, 2018 to June 30, 2019 found some improvements in results but additional work is needed at MCTS 65

Section 5: Conclusions and Recommendations.....76

Exhibit 1: Audit Scope 80

Exhibit 2: Response from Milwaukee County Transit System (MCTS).....82

Summary

Beginning in 1975, Milwaukee County provided mass public transit services under contract with a privately-owned non-profit corporation, Milwaukee Transport Services, Inc. (MTS). In December of 2014, MTS transitioned to operation as a quasi-governmental instrumentality of Milwaukee County with oversight by a new governing board. Organizationally, the program is administered by the Director's Office of the Milwaukee County Department of Transportation. MTS manages and operates the Milwaukee County Transit System (MCTS) with a fleet of 348 buses, operating over 17 million bus miles annually and serving over 27 million passengers in the counties of Milwaukee, Ozaukee and Waukesha based upon the 2020 Adopted Budget. MTS operates Paratransit services that provide demand-responsive transportation and orientation service that complement the fixed-route services of MCTS for individuals that are eligible by the Americans with Disabilities Act. MCTS is responsible for recruiting and employing the workers necessary to operate the transit system. The 2019 workforce averaged over 1,040 employees comprised of operators, mechanics and administrative employees. A majority (88 percent) of the workforce is represented by bargaining units: Amalgamated Transit Union Local 998 (ATU) and Office and Professional Employees International Union (OPEIU).

We conducted a review of employee demographics from the Human Resources' system at MCTS. This was in part a follow up to an audit we issued in 2017 which analyzed MCTS's workforce diversity. We relied upon research from the Government Alliance on Race and Equity (GARE) which found both that examining overall gross numbers using large groups of job classifications and racial groups may obscure the results and that local workforces have grown more diverse over time, though representation across different racial and ethnic groups remains inequitable. For this report, we chose to analyze the employee data with and without operators to ensure the large number of operators did not obscure the results. In addition, the 2017 audit provided data for non-white and white racial groups. This audit analyzes employee data based upon six racial categories used by the Census Bureau.

We found the staff to be more diverse in 2019 compared to the prior audit issued in 2017.

During the prior review, which spanned the years of 2010 to 2016, we calculated the percent of the workforce for non-white racial groups, females and white males. Comparing those percentages to 2019 workforce data from MCTS we found that the non-white racial groups were on average 55% of the workforce during our prior review and were 66% in 2019. Females were, on average, 30% during our prior review and were 38% in 2019. White males were, on average, 37% in our prior review and were 26% in 2019.

Comparing the overall MCTS workforce to the 2019 Census estimates shows Black or African Americans are 58% of staff versus 25% of the Census while all other racial groups are lower than their Census estimate.

We found the following comparisons between racial groups' share of the MCTS workforce and their Census estimates: the Black or African American racial group was 33% higher than the Census estimate; the American Indian/Alaska Native racial group was 0.2% lower than the Census estimate; the Asian racial group was 4% lower than the Census estimate; the Hispanic racial group was 10% lower than the Census estimate; the Two or more races racial group was 1% lower than the Census estimate and the white racial group was 18% lower than the Census estimate.

Removing operators from the data impacts the distribution of the racial groups. The Black or African American racial group drops from 58% to 25% while the white racial group increases from 33% to 61%. The Asian racial group increases from 1% to 3% while the Hispanic racial group increases from 5% to 8%.

We found the following comparisons between racial groups' share of the MCTS non-operator workforce and their Census estimate: the Black or African American racial group and the American Indian/Alaska Native racial group matched their Census estimates; the Hispanic racial group was 7% lower than the Census estimate; the Asian racial group was 2% lower than the Census estimate; the Two or more races racial group was 1% lower than the Census estimate and the white racial group was 10% higher than the Census estimate.

Reviewing the distribution of staff by job classification by race shows that the Black or African American racial group with the largest range of percentages from 14% at the low end to 72% at the high end. The white racial group has a low of 21% and a high of 71%.

We found the American Indian/Alaska Native racial group had employees in three of seven job classifications. They were 2% of employees in the Administrative Support worker job classification and 1% of Craft Workers. The Asian racial group had employees in five out of seven job classifications. They were 5% of employees in the Administrative Support Worker job classification and 11% of the Laborers and Helpers job classification versus being 3% of staff without operators. Black or African American employees were represented in all job classifications with a variety of percentages of employees. While this racial group is 25% of the non-operator workforce, they were: 30% of Directors, Managers and Supervisors, 14% of Professionals, 26% of Administrative Support Workers, 18% of Craft Workers and 44% of Laborers and Helpers. Hispanic employees were represented in six out of seven job classifications with a variety of percentage of employees. While this group is 8% of the non-operator workforce, they were: 3% of Directors, Managers and Supervisors, 14% of Professionals, 5% of Administrative Support Workers, 10% of Craft Workers and 15% of Laborers and Helpers. The Two or more races racial group had employees in three out of seven job classifications. While this racial group

is 2% of the non-operator workforce, they were: 3% of Craft Workers and 2% of Directors, Managers and Supervisors. The white racial group had employees in all job classifications. While this racial group is 61% of the non-operator workforce, they were: 71% of Professionals, 66% of Craft Workers and 30% of Laborers and Helpers.

MCTS showed a large disparity when reviewing the workforce by gender versus the Census estimates for gender in 2019.

In 2019, the Census Bureau reported the Milwaukee County population to be 52% female. In 2019, 38% of the MCTS's overall workforce was female; without operators 23% of MCTS's workforce was female.

Analyzing staff distribution by job classification by gender shows a range of females in the workforce from 3% at the low end to 57% at the high end. Craft Workers have the lowest percentage with four females out of 120 employees.

The job classification that most closely matches the Census data was the Technicians which is 50% female but only contains four employees. We found four job classifications that had a large variance to MCTS's overall female workforce level. The Craft Workers are 3% female, the Laborers and Helpers are 19% female and Directors, Managers and Supervisors are 29% female. Administrative Support Workers were 57% female.

We found a wide range of gender distribution amongst racial groups with the highest being the Black or African American and American Indian/Alaska Native racial groups nearly matching the countywide percentage. The white racial group was the lowest at 20%.

For overall staff, we found Black or African American and American Indian/Alaska Native females nearly matched the countywide percentage of females comprising 50% of the staff from these racial groups. Of the 20 Two or more races employees, eight were female and they were 40% of the racial group. Of the 11 Asian employees, three were female and they were 27% of the racial group. Of the 54 Hispanic employees, 13 were female and they were 24% of the racial group. White females were the lowest percentage of their racial group with 20% of the white racial group being female employees.

Without operators, female representation dropped to 0% for the Two or more races racial group and to 17% for the Hispanic racial group.

We found the American Indian/Alaska Native racial group had two employees one from each gender; Asian females were 20% of their racial group; Black or African American females were 33% of their racial group; Hispanic females were 17% of their racial group; Two or more races had no female employees and white females were 20% of their racial group.

Analyzing staff distribution by race and gender and job classification showed the Administrative Support Workers were the most diverse job classification.

White males were 45% of Directors, Managers and Supervisors and 64% of the Craft Workers job classification employees. The largest group for operators were Black or African American females who were 38% of all operators.

Only two, Asian and white, out of six racial groups earned in excess of the average salary of $54,585 in 2019.

In 2019, we found that the Asian racial group and the white racial group earned in excess of the average salary while the remaining four racial groups, American Indian/Alaska Native, Black or African American, Hispanic and Two or More races, earned below the average. The eight members of the American Indian/Alaska Native racial group were the lowest average earners with an average of $50,869.

When analyzing salary data at three sets of earners, we found only the Black or African American and white racial groups with substantial variances as income increased.

We found the Black or African American racial group was the largest racial group for both the bottom and middle salaries set being 76% of the lowest set and 65% of the middle set. This racial group was 28% of the top set. The white racial group was 14% of the lowest salary set and 62% of the top salary set. The remaining racial groups showed minimal variance in their percentages at the three sets of salaries that we analyzed.

For the top 100 earners, the Black or African American racial group exceeded their Census percentage but fell below their workforce numbers while the white racial group exceeded both their Census percentage and their overall workforce numbers.

We found 66% of the top earners were from the white racial group compared to 33% of the workforce overall; 27% of the top earners were from the Black or African American racial group compared to 58% of the workforce overall; 3% of the top earners were from the Asian racial group compared to 1% of the workforce overall; 2% of the top earners were from the Hispanic racial group compared to 5% of the workforce overall; 2% of the top earners were from the Two or more races racial group which matches their percentage of the workforce overall and there were no employees from the American Indian/Alaska Native racial group in the top earners.

The salary gap between genders was $3,725 in 2019.

The overall average salary at MCTS in 2019 was $54,585. Male employees earned an average of $56,007, which was $3,725 more than females who averaged $52,282.

Female representation drops from 57% at the lowest salary set to 18% at the highest salary set.

Females are 57% of the employees in the lowest salary set. The middle salary set exactly matches the overall workforce at 38% female. At the top set of salaries only 18% were female.

Of the top 100 earners there were 27 females and 73 males.

We found 27% of the top 100 earners were female versus 38% of the overall workforce at MCTS.

White females were the group with the second highest average income and the only racial group where females earned more than males.

We found Asian males were the highest average earners at MCTS in 2019. There were eight Asian males employed in 2019. White females were the second highest group and the only racial group where females earned more than males. White males earned just slightly less than white females. The lowest average earners were Two or more races females. This group had the largest gender gap with females earning on average $11,311 less than males. Earning below MCTS's overall average salary were American Indian/Alaska Native females and males, Black or African American females and males, Hispanic females and Two or more races females.

When reviewing salaries at three sets by race and gender we found that Black or African American females were 46% of the lowest salary set and 7% of the highest salary set. White males were 8% of the lowest set and 52% of the highest set.

We found Black or African American females were 46% of the lowest salary set and 29% of MCTS's overall workforce. White males were 8% of the lowest salary set and 26% of MCTS overall workforce. All groups in the mid-range set had percentages that were within five percentage points of their overall workforce levels. At the highest salary set Black or African American females were 7% of the highest salary set and 29% of the overall workforce. Black or African American males were 20% of the highest salary set and 29% of MCTS overall workforce. White males were 52% of the highest salary set and 26% of the overall workforce. All other groups were within three percentage points of their overall workforce levels.

In the top 100 earners there were no American Indian/Alaska Natives of either gender and no females from the Asian, Hispanic or Two or more races racial groups.

We found no American Indian/Alaska Natives of either gender, no Asian females, no Hispanic females and no Two or more races females in the top 100 earners. Of the top 100 earners, 10% were Black or African American females versus 29% of the overall workforce at MCTS. 17% of the top 100 earners were Black or African American males versus 29% of the overall workforce at MCTS. 17% of the top

100 earners were white females versus 7% of the overall workforce at MCTS. 49% of the top 100 earners were white males versus 26% of the overall workforce at MCTS.

Overall hiring data from 2019 shows the white racial group as the only group hired at a rate lower than its percentage of the overall workforce.

In 2019, 72% of all hires were from the Black or African American racial group compared to 58% of MCTS's overall workforce. The white racial group was 15% of all hires versus 33% of the overall workforce. The Hispanic racial group was 7% of all hires versus 5% of the overall workforce.

Without operators the white racial group remains the only group hired at a rate lower than its share of the workforce, but the percentage of hires increased from 15% to 43%.

For the non-operator hiring we found the Hispanic racial group was 26% of the 2019 hires versus being 8% of the non-operator workforce; the white racial group was 43% of the hires versus being 61% of the non-operator workforce; members of the Two or more races and the Black or African American racial groups were within 1% of their non-operator workforce percentage; the Asian racial group was 3% of the hires and 3% of the non-operator workforce. There were no American Indian/Alaska Natives hired.

Overall hiring data from 2019 shows females were 44% of all hires and 14% of non-operator hires.

Overall, 44% of all hires in 2019 were female compared to 38% of MCTS's workforce. The percentage of females hired drops to 14% when operators are removed.

For overall hiring, we found that white males had the largest gap between hiring percentage and the workforce percentage being 9% of hires and 26% of the workforce.

We found Black or African American females were 35% of hires versus 29% of the workforce while Black or African American males were 38% of hires and 29% of the workforce. Hispanic females were 1% of hires and 1% of the workforce. Hispanic males were 6% of hires and 4% of the workforce. White females were 5% of the hires and 7% of the workforce while white males were 9% of the hires and 26% of the workforce.

Hiring data without operators shows that all five females that were hired were from the white racial group.

We found for non-operator hiring: no hires of Asian, Black or African American or Hispanic females occurred; of the five females hired, all were white females; no hires of American Indian/Alaska Native of either gender occurred; Black or African American males were 26% of hires and 17% of the non-operator workforce; Hispanic males were 26% of hires and 6% of the non-operator workforce and white males were 29% of the hires and 49% of the non-operator workforce.

Hires less separations varied across racial groups for the overall workforce with the Hispanic racial group having an increase of six employees and the white racial group with a decrease of 17 employees.

Analyzing the net difference between hires and separations during 2019 found that there was a decrease of one employee from the American Indian/Alaska Native racial group, 12 employees from the Black or African American racial group, and 17 employees from the white racial group. The Asian racial group increased by one employee, the Hispanic group by six employees and the Two or more races group by three employees.

Removing operators did not impact the racial groups with the largest net increase, the Hispanic racial group nor the largest net decrease, the white racial group.

Analyzing the net difference between hires and separations during 2019 for the workforce excluding operators found that the Black or African American racial group and the white racial group had negative changes while all other racial groups were either neutral or had positive net changes in 2019. The Hispanic racial group had the largest gain with a positive result of eight due to the hiring of nine members from the Hispanic racial group offset by one separation.

For the staff without operators female employees decreased at a net of seven employees while male employees increased at a net of six employees.

Analyzing the net difference between hires and separations for overall staff, during 2019, female employees decreased by a net of two while male employees decreased by 18. For the workforce excluding operators, female employees decreased by a net of seven while male employees increased by six.

When reviewing net change by race and gender for the overall workforce we found that the two groups with the largest net decrease of employees were Black or African American males and white males.

Analyzing the net difference between hires and separations during 2019 we found that for the overall workforce: American Indian/Alaska Native females decreased by one while there was no change for American Indian/Alaska Native males; Asian males increased by one while there was no change for Asian females; Black or African American females decreased by two while Black or African American males decreased by 10; Hispanic females increased by one while Hispanic males increased by five; Two or more races females increased by two while Two or more races males increased by one; white females decreased by two while white males decreased by 15.

Removing operators from the analysis resulted in Hispanic males having a net increase, Black or African American females and both males and females of the white racial group having a net decrease.

Analyzing the net difference between hires and separations during 2019 we found that without operators: there was no change for either gender of American Indian/Alaska Natives; Asian males increased by one while there was no change for Asian females; Black or African American females decreased by a net of 3 while there was no change to Black or African American males; Hispanic males increased by eight while there was no change for Hispanic females; Two or more races males increased by one while there was no change for Two or more races females and both genders of the white racial group decreased by 4.

There were a total of 42 promotions for non-operator positions during our review. Two groups, Asian and American Indian/Alaska Native, had no promotions. Black or African American employees were 40% of the promoted employees versus being 25% of the non-operator workforce. Females were 29% of all promotions versus being 23% of the non-operator workforce.

We found: 40% of the promotions were from the Black or African American racial group compared to 25% of the non-operator workforce; 7% of the promotions were from the Hispanic racial group compared to 8% of the non-operator workforce; 7% of the promotions were from the Two or more races racial group compared to 2% of the non-operator workforce; and 45% of the promotions were from the white racial group compared to 61% of the non-operator workforce. Females were 29% of the promoted employees versus 23% of the non-operator workforce.

We also analyzed the promotions by race and gender and found that both genders of the white racial group and Hispanic males were promoted at a rate lower than their share of the non-operator workforce. Three groups were promoted at a rate that was higher than their share of the non-operator workforce. Seven Black or African American females were promoted which was 17% of promotions and they are 8% of the non-operator workforce. Ten Black or African American males were promoted which was 24% of the promotions and they are 17% of the non-operator workforce. One Hispanic female was promoted which was 2% of promotions and they are 1% of the non-operator workforce. Three employees from the Two or more races racial group were promoted. All were male employees. They comprised 7% of the promotions compared to 2% of the non-operator workforce.

MCTS is required to establish and follow an Equal Employment Opportunity Plan per the U.S. Department of Transportation.

The Federal Transit Administration requires recipients to submit an updated EEO Program every four years or as major changes occur in the workforce or employment conditions, whichever comes first.

The plan covers all employment and personnel practices, including recruitment, hiring, promotions, separations, transfers, layoffs, classification, compensation, training, benefits, and other terms and conditions of employment. MCTS issued a new EEO plan in March of 2020 that is in effect until 2024.

The FTA circular contains 14 requirements of the EEO Officer. We found two of the 14 requirements were not specifically identified in the MCTS job description.

MCTS hired a Director of Diversity and Inclusion in October 2017, who serves as its EEO officer. We reviewed the job description for the Director of Diversity and Inclusion and found that there were two requirements out of 14 in the FTA Circular that were not noted in the MCTS job description. Both related to auditing of program items.

The FTA circular also contains a checklist for the officer to concur in the hiring process. We reviewed the checklist for concurrence and found no issues between the checklist and the job description.

In addition, the FTA Circular includes a sample concurrence checklist that is used to ensure concurrence with the hiring and promotion process. We did not find any deviation from the checklist in the Director of Diversity and Inclusion job description.

The Director of Diversity and Inclusion is responsible for labor relations while the FTA circular is silent on any prohibition on that role, it does emphasize that no conflicts or appearance of conflicts appear.

The Director of Diversity and Inclusion in an interview noted that he has also been responsible for labor relations at the agency and that it has been a time-consuming task at the agency with recent contract negotiations occurring with both unions at MCTS. There is a Director of Labor Relations that reports to the Director of Diversity and Inclusion.

The FTA Circular also includes language regarding training and informing parties of its EEO program.

The FTA Circular requires agencies to communicate the existence of its EEO program and includes methods such as conducting periodic training for employees and managers and conducting EEO training for all new supervisors or managers within 90 days of their appointment. Based on interviews with executive staff at MCTS, MCTS does not currently offer EEO training for its newly hired supervisors or managers.

MCTS has expanded its outreach efforts by attending job fairs and partnering with the technical colleges in Milwaukee and Waukesha. The mentoring program continues to be delayed while additional participation in the tuition reimbursement program should be encouraged.

According to interviews with Human Resources staff, MCTS has expanded its hiring outreach via job fairs, contact with veterans and schools and seeking out different communities such as attending the Hispanic Heritage Festival. MCTS indicated that they attended 24 job fairs and outreach activities in the community in 2019.

Mentoring Program

A recommendation of our prior audit was the establishment of a mentoring program at MCTS. MCTS indicated as of the May 2019 status report on the prior audit that the mentoring program has been formally established. In an interview with MCTS management they indicated that the current pandemic has resulted in a delay in implementation as they pivot to an online version of the program as staff is teleworking.

Tuition Reimbursement

MCTS provided us with a copy of its tuition reimbursement policy, a sample of the application form and a listing of the participants from January 1, 2018 to June 30, 2019. There were a total of eight participants.

MCTS's Equal Employment Program has a Recruitment and Selection policy outlining steps to be taken when hiring for a position. The policy was recently revised.

MCTS provided us with a copy of its EEO plan which included Policy 1.302 Recruitment and Selection. The purpose of the policy is to "provide guidelines for recruiting and selecting employees for available positions at MCTS".

We found attendance at scoping meetings was 79% from the white racial group although this is partially driven by Human Resources' staff attendance at the meetings.

We found that the total attendance at scoping meetings was a count of 34 with some individuals attending more than once. The number of attendees ranged from two to four for each position with three being the most frequent number of attendees. Five out of 12 meetings were staffed by members of the white racial group without any other group represented.

Of the total applicants, 33% did not reveal demographics. Of those who did, applicants from both the Hispanic and white racial groups applied at a lower percentage than their workforce percentage.

Total applicants during the period of our review were 430 individuals. Of those, 143 did not disclose which racial group they were from and 141 did not disclose their gender. The applicant pool was as follows: 68% of the applicants were from the white racial group versus 61% of non-operator staff; Black or African American applicants matched the racial group's workforce percentage at 25%; 1% of the

applicants were from the Hispanic racial group versus 8% of non-operator staff; 4% of the applicants were from the Asian racial group versus 3% of non-operator staff; 1% of applicants were from the Two or more races racial group versus 2% of the non-operator workforce; one applicant was from the Native Hawaiian racial group and there were no applicants from the American Indian/Alaska Native group.

Candidates selected for interviews were within 4% or less of the percentage rate at which they applied by racial group.

The applicants who were selected for interviews totaled 50 including one female who did not disclose her race and one applicant who did not disclose race or gender.

The make-up of the interview panels was not as diverse as the non-operator workforce.

The interview panels were as follows: 66% of the participants were from the white racial group versus 61% of non-operator staff; Black or African American participants were 15% versus 25% of non-operator staff; 5% of the participants were from the Hispanic racial group versus 8% of non-operator staff; 12% of participants were from the Two or more races racial group versus 2% of the non-operator staff; 2% of the participants had an unknown racial group and there were no participants from the American Indian/Alaska Native or the Asian racial groups.

Of the 14 hires that occurred, employees were from only three racial groups, Black or African American, Two or more races and white.

Of the 12 requisition files we reviewed, nine of the hires were from the white racial group, four were from the Black or African American racial group and one was from the Two or more races racial group. One file resulted in no hiring and three files had two positions filled.

We reviewed the requisition files for participation by gender and found that all areas exceeded MCTS's female non-operator workforce percentage of 23%. Two categories, Scoping Meetings and Interview Panels, did not exceed 30% female participation.

As a part of our review of the 12 requisition files from hiring that occurred from January 1, 2018 to June 30, 2019 we also looked at the steps by gender participation. Non-operator females are 23% of the workforce at MCTS. We found all categories exceeded the 23% in terms of participation from females; 39% of applicants were females; 36% of candidates selected for interviews were females and 43% of candidates hired or promoted were female. The two categories that look at MCTS participation rather than applicants were the lowest steps for female participation with the scoping meeting at 29% female and the interview panel at 27% female.

Requisition File compliance with policy found that the required review of potential barriers and biases did not occur within the 12 files we reviewed.

We reviewed requisition files and found that in five out of twelve hirings, the Director of Diversity and Inclusion was noted as having participated in the scoping meeting or concurring on the hiring. We found no evidence within the 12 files we reviewed that the following required actions occurred: review of potential artificial barriers within job descriptions; review of the process to identify possible areas of bias and assessment team identifying unsuccessful internal candidates for consideration for opportunities for mentoring or additional education.

Background

Beginning in 1975, Milwaukee County provided mass public transit services under contract with a privately-owned non-profit corporation, Milwaukee Transport Services, Inc. (MTS). In December of 2014, MTS transitioned to operation as a quasi-governmental instrumentality of Milwaukee County with oversight by a new governing board. Organizationally, the program is administered by the Director's Office of the Milwaukee County Department of Transportation (MCDOT). The Director's Office reports to the County Executive. MCTS bylaws specify in Article IV that MCTS shall be governed by a Board of Directors. The Committee on Transportation, Public Works and Transit of the Milwaukee County Board of Supervisors serves as the policy committee for County related issues.

MTS manages and operates the Milwaukee County Transit System (MCTS) with a fleet of 348 buses, operating over 17 million bus miles annually and serving over 27 million passengers in the counties of Milwaukee, Ozaukee and Waukesha based upon the 2020 Adopted Budget. MTS operates Paratransit services that provide demand-responsive transportation and orientation service that complement the fixed-route services of MCTS for individuals that are eligible by the Americans with Disabilities Act (ADA). MTS also has a Growing Opportunities Program pass (GO Pass) that allows reduced fee rides to eligible ADA riders and eligible individuals 65 and older on all MCTS buses.

MCTS is responsible for recruiting and employing the workers necessary to operate the transit system. The 2019 workforce averaged over 1,040 employees comprised of operators, mechanics and administrative employees. A majority (88 percent) of the workforce is represented by bargaining units: Amalgamated Transit Union Local 998 (ATU) and Office and Professional Employees International Union (OPEIU). Workers not represented by a bargaining unit are classified as non-represented employees. The 2020 Adopted Budget projected total revenues of $147.7 million, total expenditures of $159.9 million, and a tax levy contribution of $12.2 million.

Since 1977, the U.S. Department of Transportation (DOT) has required recipients of transit funding to meet certain criteria to establish Equal Employment Opportunity (EEO) Programs and to comply with applicable laws and regulations. MCTS is required to comply. The Federal Transit Authority (FTA), an agency within the DOT, issues circulars to inform recipients of their requirements. The EEO Circular explains FTA's EEO Program requirements, the complaint and oversight process and reflects changes in the laws, regulations, and guidance since the guidelines were originally issued in 1988.

Prior Audit Work

In June of 2017, we published an audit report titled, "Improvements Needed to Strengthen Milwaukee County Transit System's (MCTS) Commitment to Workforce Diversity." The report described MCTS's longstanding policy and commitment to diversity, fairness and equal opportunities in the hiring practices including promotions, demotions and terminations/turnover efforts outlined in its Equal Employment Opportunity Program Affirmative Action Plan (EEO/AA Plan). During this review, which spanned the years of 2010 to 2016, we noticed that MCTS has experienced numerous key management and staff changes that directly influenced its efforts to oversee, maintain, and monitor a diverse workforce free from harassment and discrimination. Major areas of concern we identified include the following items:

- Utilization data indicates that MCTS could have improved workforce diversity in several key job categories.
- Perceptions about workforce diversity could have been addressed more effectively.
- MCTS's commitment to diversity needed to be clarified in hiring, promotion, and separation procedures.
- Accountability for review of complaints could have been enhanced.
- Efforts were needed to ensure that MCTS pay equal salaries to minorities and females in similar positions.
- MCTS needed to address compliance with previous and amended EEO Program Requirements.

We found in our prior work that on average the non-white racial groups represented 3,993 or 54.6 percent of the workforce, females 2,205 or 30.2 percent, and white males 2,703 or 37.0 percent over the seven-year period. We made 25 recommendations that we believed, if completed, would strengthen the implementation of MCTS's EEO/AA Plan. Since the initial adoption of the audit recommendations in the fall of 2017, we have presented four informational status updates to the County Board.

Segal Waters Consulting Firm Analysis

MCTS partnered with Segal Waters Consulting to conduct a rigorous assessment of its compensation structure after the release of our prior audit. In a presentation from Segal Waters Consulting summarizing the findings of the study MCTS reported that 88 job titles were reviewed. The review resulted in 39 job titles being maintained, 44 job titles were re-worded, four job titles were collapsed into two titles and one title was expanded into two job titles. Segal Waters Consulting delivered draft

job descriptions for all recommended job titles. MCTS updated job titles based upon the Segal Water Consulting reports in early 2020.

Regarding compensation, Segal Waters Consulting recommended new salary structures for 12 pay grades, and found MCTS positions were 85% of market. MCTS implemented pay changes for non-represented positions effective in December of 2019 with retroactive payment to October 2019. The changes were for all incumbents in a job and not employee specific.

In the May 2019 audit status update report MCTS stated that "with one exception, it found that the compensation structure provides equal pay for equal work. A one-time pay increase for one employee has been authorized to correct the one irregularity that the analysis discovered." With that action, MCTS stated it believes it is in full compliance with relevant equal pay laws. When asked about the calculations, MCTS informed auditors that MCTS used internal employee demographic data and compensation data from Segal Water Consulting to form the conclusion.

Milwaukee County Strategic Plan and the Government Alliance on Race and Equity

During the fall of 2019, an administrative strategic planning effort resulted in the development of three-year objectives for Milwaukee County. The plan includes the following goals:

> Milwaukee County leadership, management, and staff will reflect the demographics (including but not exclusively racial) of Milwaukee County; Milwaukee County will have an inclusive workplace culture where differences are welcomed, where different perspectives are heard, and where individuals feel a sense of safety and belonging with no significant differences by race and gender; Employees will understand what skills and experience are expected to advance to the next level and will have opportunities to gain those skills and experiences.

Milwaukee County is a member of the Government Alliance on Race and Equity (GARE) which is a national network of governments working to achieve racial equity and advance opportunities for all. The GARE website contains several reference documents for its members to use.

GARE released a report titled, "Public Sector Jobs: Opportunities for Advancing Racial Equity" which stated, "for local and regional government focused on achieving racial equity in our communities "walking the talk" within one's own institution and workforce is an important place to focus." The issue brief provides a collective approach to expanding the field of practice of workforce equity within government. Additional findings in the brief include that most discrimination in the U.S. is not caused by intention to harm people who are different, but by favoritism directed at helping people who are

similar, which results in greater access to jobs and promotions for people similar to those of the in-group.

The brief also found that examining overall gross numbers using large groups of job classifications and racial groups may obscure the results. Governments need to answer the questions: do they have some classifications where employees do not represent the community at large; what is the racial distribution of staff in lower-wage classifications; for positions that are exempt from civil service requirements, are there wage differentials by race and gender. The report found that local workforces have grown more diverse over time, though representation across different racial and ethnic groups remains inequitable.

The brief recommended that Human Resource staff and hiring managers can work together on the development and implementation of policies and procedures including revising job descriptions and interview questions, identifying points in the hiring process that show a departure of candidates of color. A government's action plan must include specific goals, implementation strategies and measures that will track progress. Assignment of responsibility for implementation of strategies and achieving results must also be in the plan.

GARE released a report, "Racial Equity Toolkit: An Opportunity to Operationalize Equity" updated in December of 2016. Racial equity tools seek to include clear consideration of racial equity in decisions, including policies, practices, programs, and budgets. Using a racial equity tool can help to develop policies and procedures that reduce racial inequities and improve success for all groups. A racial equity tool:

- Seeks to eliminate racial inequities and advance equity at the front end;
- Identifies clear goals, objectives and measurable outcomes;
- Engages community in decision-making processes;
- Identifies who will be impacted by a given decision, examines potential unintended consequences of decisions, and develops policies and procedures to advance racial equity and mitigate unintended negative consequences; and
- Develops actions for successful implementation and evaluation of the impact of the toolkit**.**

The article discusses the need for a tool kit because many current inequities are sustained by repeat patterns of exclusion despite the lack of direct intention. Without changes, institutions will continue to perpetuate inequities. Governments have the ability to implement policy change to drive larger systematic change. Routine use of a racial equity tool works to integrate racial equity into governmental operations.

Current Audit

Our prior audit remains open with outstanding recommendations. Due to an expressed interest by the County Board, the age of the data used in the prior audit and an increased emphasis at the County on racial equity, it was determined that a revisit of employee data from MCTS might provide additional information and provide a path to the closure of the prior audit. As a part of this audit, we conducted a limited review of employee data from January 1, 2018 to December 31, 2019. We pulled concepts from prior audits including any recommendations and designed our testing for this audit around those. Going forward, we will consolidate our follow up on recommendations contained in this report.

We used data provided from MCTS's Human Resources system. We used the racial categories found within that system in our report. While the FTA continues to require reporting from MCTS on the percentage of "minorities" we followed the GARE guidelines that cautioned using gross numbers may obscure the data. Therefore, we analyzed the staff based upon the six racial categories found in the MCTS's Human Resources system that also align with the Census Bureau estimates for Milwaukee County. One additional racial category, Native Hawaiian, was not included in our analysis as the only time we encountered a member of that racial group was in the analysis of applicants by racial group. In addition, following the GARE guidelines, we choose to analyze employee data both with and without operators to ensure the large number of operators did not obscure the results.

Section 1: While the diversity of staff has improved since our prior audit, there is still variance to Census estimates. Once operators are removed, the white racial group is the only group in excess of Census estimates. Gender disparity remains.

We found the staff to be more diverse in 2019 compared to the prior audit which reviewed 2010 to 2016.

Prior Audit Work Findings

In June of 2017, we published an audit report titled, "Improvements Needed to Strengthen Milwaukee County Transit System's (MCTS) Commitment to Workforce Diversity." The report described MCTS's longstanding policy and commitment to diversity, fairness and equal opportunities in the hiring practices including promotions, demotions and terminations/turnover efforts outlined in their Equal Employment Opportunity Program Affirmative Action Plan (EEOP/AA Plan).

During this review, which spanned the years of 2010 to 2016, we calculated the percent of the workforce for non-white racial groups, females and white males. Comparing those percentages to 2019 workforce data from MCTS we found that the non-white racial groups were on average 55% of the workforce during our prior review and were 66% in 2019. Females were, on average, 30% during our prior review and were 38% in 2019. White males were, on average, 37% in our prior review and were 26% in 2019.

Staff Demographic Data by Race

The U.S. Census Bureau, Population Estimates Program provides an updated listing of the

population for each County by its racial categories annually. The Census Bureau, based on the Office of Management and Budget (OMB) requirements, collects race data for a minimum of five groups: American Indian or Alaska Native, Asian, Black or African American, white, and Native Hawaiian or Other Pacific Islander. The OMB permits the Census Bureau to also use a sixth category – Two or more races. Respondents may report more than one race. According to the Census Bureau, the concept of race is separate from the concept of Hispanic origin. However, the data does include a population percentage for individuals who identify themselves of Hispanic Origin.

Comparing the overall MCTS workforce to the 2019 Census estimates shows Black or African Americans are 58% of staff versus 25% of the Census while all other racial groups are lower than their Census estimate.

We compared the MCTS workforce to the racial data estimate issued by the Census Bureau for 2019. The population data for the Census includes people of all age categories.

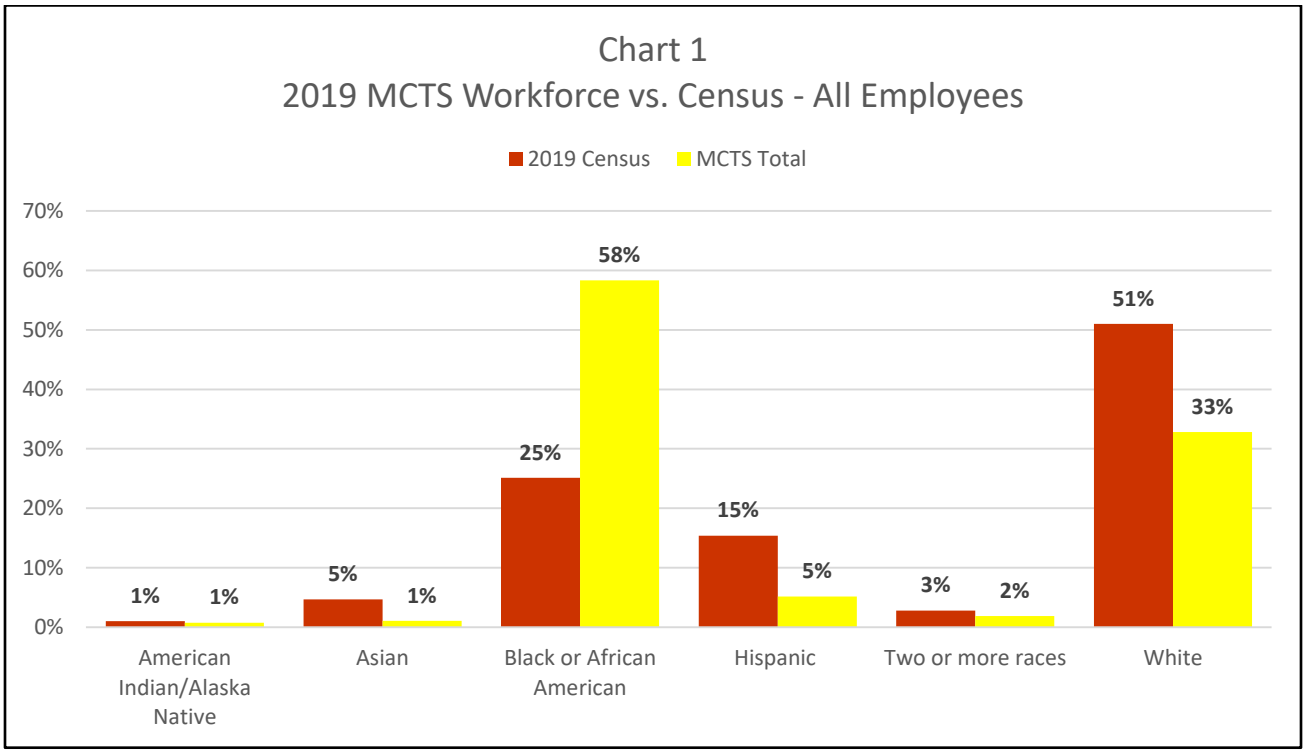
Black or African Americans are 58% of the overall staff versus 25% of the Census.

We found the only group to have a larger percentage in the MCTS workforce than the Census estimate was the Black or African American racial group which was 58% of the total workforce versus 25% of the population.

We found the following groups to have a lower percentage in the MCTS workforce compared to the Census estimate:

- American Indian/Alaska Native was 0.2% lower than the Census estimate.
- Asian racial group was 4% lower than the Census estimate.
- Hispanic racial group was 10% lower than the Census estimate.
- Two or more races was 1% lower than the Census estimate.
- White racial group was 18% lower than the Census estimate.

Chart 1 displays the Milwaukee County Transit System's overall workforce by racial group and the estimates for the Milwaukee County population provided by the Census Bureau.



Source: Audit Services Division created chart based upon data from MCTS's Human Resources system. The Census Data identified whites alone as 64.3% and white alone, not Hispanic as 51.0% which results in 13.3% of Hispanics who were from the white racial group. The category for Black or African American was reduced by 2.1% to account for Hispanic origin of non-white race for the Census Data. Hispanics were listed by Census Bureau as 15.4% which resulted in the category for Black or African American being reduced by 2.1% to account for Hispanic origin of non-white race for the Census Data.

Removing operators from the data impacts the distribution of the racial groups. The Black or African American racial group drops from 58% to 25% while the white racial group increases from 33% to 61%. The Asian racial group increases from 1% to 3% while the Hispanic racial group increases from 5% to 8%.

30% of MCTS are non-operators and the racial distribution of that staff varies from the overall workforce at MCTS.

Approximately 70% of MCTS's workforce are operators and are members of the Amalgamated Transit Union Local 998. Due to operators being a large share of the workforce and a very diverse group at MCTS, we removed the operators to see the racial diversity of the staff without the operators.

The percentage share of the workforce for the Black or African American racial group drops from 58% to 25% when operators are removed. The white racial group increases from 33% to 61% while the Hispanic racial group increases from 5% to 8% and the Asian racial group from 1% to 3%. The American Indian/Alaska Native and Two or more races racial groups remain at 1%.

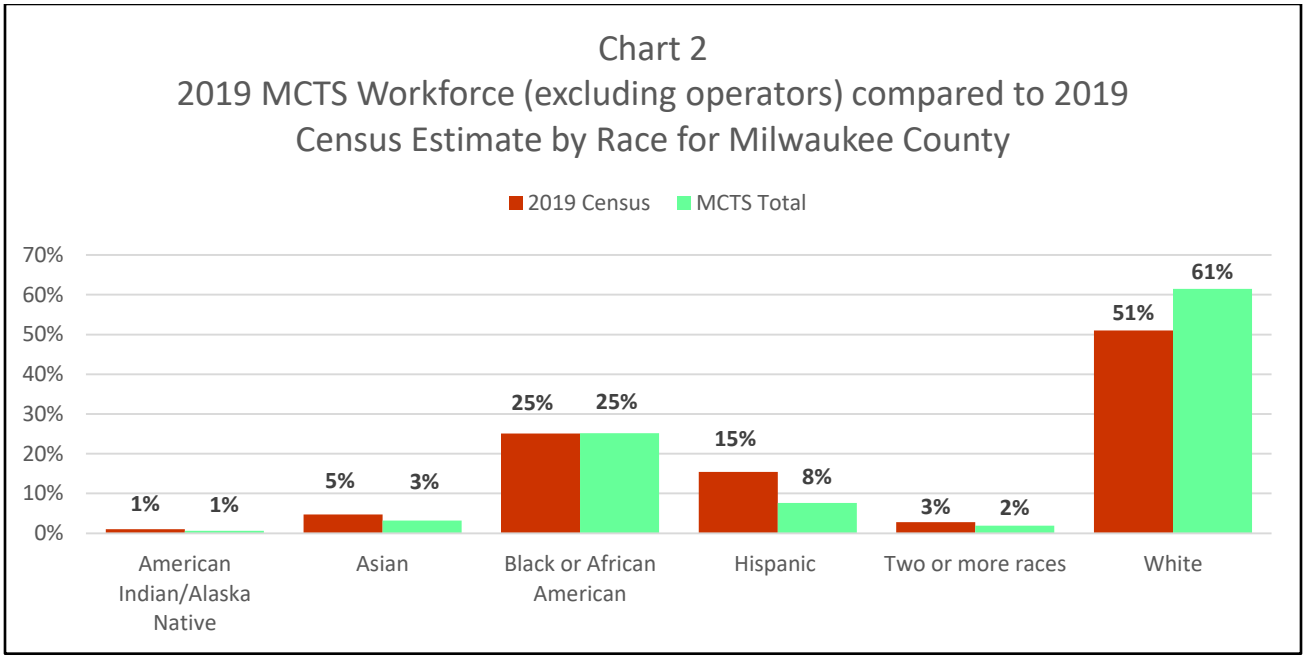
For non-operators the white racial group was the only group in excess of its population being 61% of the workforce versus 51% of the population.

We then compared the workforce numbers without operators to the 2019 Census estimates. We found the only group to have a larger percentage in the MCTS workforce than the Census estimate was the white racial group which was 10% higher than the Census estimate. Two groups, the Black or African American racial group and the American Indian/Alaska Native racial group matched their Census estimates.

We found the following groups to have a lower percentage in the MCTS workforce excluding operators compared to the Census estimate:

- Hispanic racial group was 7% lower than the Census estimate.
- Asian racial group was 2% lower than the Census estimate.
- Two or more races racial group was 1% lower than the Census estimate.

Chart 2 displays the MCTS workforce by racial group excluding operators and the estimates for the Milwaukee County population provided by the Census Bureau.



Source: Audit Services Division created chart based upon data from the MCTS's Human Resources system. The Census Data identified whites alone as 64.3% and white alone, not Hispanic as 51.0% which results in 13.3% of Hispanics were from the white racial group. The category for Black or African American was reduced by 2.1% to account for Hispanic origin of non-white race for the Census Data. Hispanics were listed by Census Bureau as 15.4% which resulted in the category for Black or African American being reduced by 2.1% to account for Hispanic origin of non-white race for the Census Data.

Staff Demographic Data by Race and Job Classification

Reviewing the distribution of staff by job classification by race shows that the Black or

African American racial group with the largest range of percentages from 14% at the low end to 72% at the high end. The white racial group has a low of 21% and a high of 71%.

MCTS staff is broken into seven job classifications based upon Federal EEOC categories. We conducted a demographic analysis of staff by job classification. Table 1 contains a list of examples of job titles from each job classification grouping and the average annual salary in 2019.

Table 1
Examples of Job Titles by Job Classification

Job Classification	Examples of Position Classifications	Average Salary – 2019
Operatives	Operators	$50,924
Directors, Managers, Supervisors	Directors, CFO, CAO, Supervisors, Dispatchers, Managers	$76,531
Professionals	Planners, Engineers, Analysts, Trainers	$59,046
Technicians	Warranty Specialist, Technical Support Analyst, Programmer Analyst, System Analyst	$64,319
Administrative Support Workers	Clerks, Administrative Assistants, Accountants, Office Manager Secretary, Customer Service Reps.	$52,096
Craft Workers	Mechanics, Electricians, Fabricators, Maintenance Repairers, Technicians	$60,540
Laborers & Helpers	Cleaners/Tankers, Maintenance Helpers	$49,861

Source: Audit Services Division created table based upon data from MCTS's Human Resources system.

In comparing the distribution by race within job classification to the distribution within the staff, without operators, we found:

- The American Indian/Alaska Native racial group had employees in three of seven job classifications. In the Administrative Support Worker job classification they were 2% of employees versus 0.6% of staff without operators.

- The Asian racial group had employees in five out of seven job classifications. They were 5% of employees in the Administrative Support Workers and 11% of the Laborers and Helpers job classifications versus being 3% of staff without operators.

- Black or African American employees were represented in all job classifications with a variety of percentages of employees. While this racial group is 25% of the non-operator workforce, they were: 30% of Directors, Managers and Supervisors, 14% of Professionals, 18% of Craft Workers and 44% of Laborers and Helpers.

- Hispanic employees were represented in six out of seven job classifications with a variety of percentage of employees. While this group is 8% of the non-operator workforce, they were: 3% of Directors, Managers and Supervisors, 14% of Professionals, 5% of Administrative Support Workers, 10% of Craft Workers and 15% of Laborers and Helpers.

- The Two or more races racial group had employees in three out of seven job classifications. While this racial group is 2% of the non-operator workforce, they were: 3% of Craft Workers and 2% of Directors, Managers and Supervisors.

- The white racial group had employees in all job classifications. While this racial group is 61% of the non-operator workforce, they were: 71% of Professionals, 66% of Craft Workers and 30% of Laborers and Helpers.

Table 2 shows the distribution of staff by race by job classification for 2019.

Table 2
Distribution of Staff by Race by Job Classification for 2019

	Total Employees	American Indian/ Alaska Native	Asian	Black or African American	Hispanic	Two or More Races	White
MCTS Overall	1,048	1%	1%	58%	5%	2%	33%
MCTS Non-Operators	314	1%	3%	25%	8%	2%	61%
Job Classification							
Operatives	734	1%	0.1%	72%	4%	2%	21%
Dir., Mgr. Sup.	93	0%	3%	30%	3%	2%	62%
Professionals	28	0%	0%	14%	14%	0%	71%
Technicians	4	0%	0%	50%	0%	0%	50%
Admin. Support	42	2%	5%	26%	5%	0%	62%
Craft Workers	120	1%	2%	18%	10%	3%	66%
Laborers & Help	27	0%	11%	44%	15%	0%	30%

Note: Rounded to the nearest percentage.
Source: Audit Services Division created table based upon data from MCTS's Human Resources system.

As a part of their EEO plan submitted to the FTA MCTS is required to report on past utilization goals by the non-white racial groups staffing percentages. MCTS bases its utilization goals on the estimated qualified labor pool with its recruitment areas.

Table 3, which is based upon MCTS's January 28, 2020 submittal to the FTA, shows the job groups that had a goal included in the EEO plan and the current percentage of staff.

Table 3
MCTS EEO Plan Goals for Non-white Employees and Actual Percentages as of January 28, 2020

Job Group	Utilization Goal	Actual % of Non-white Employees
Managers	37%	30%
Technicians	30%	50%
Office & Clerical Workers	32%	40%
Craft Workers (skilled)	29%	34%*
Craft Workers (semi-skilled)	57%	34%*

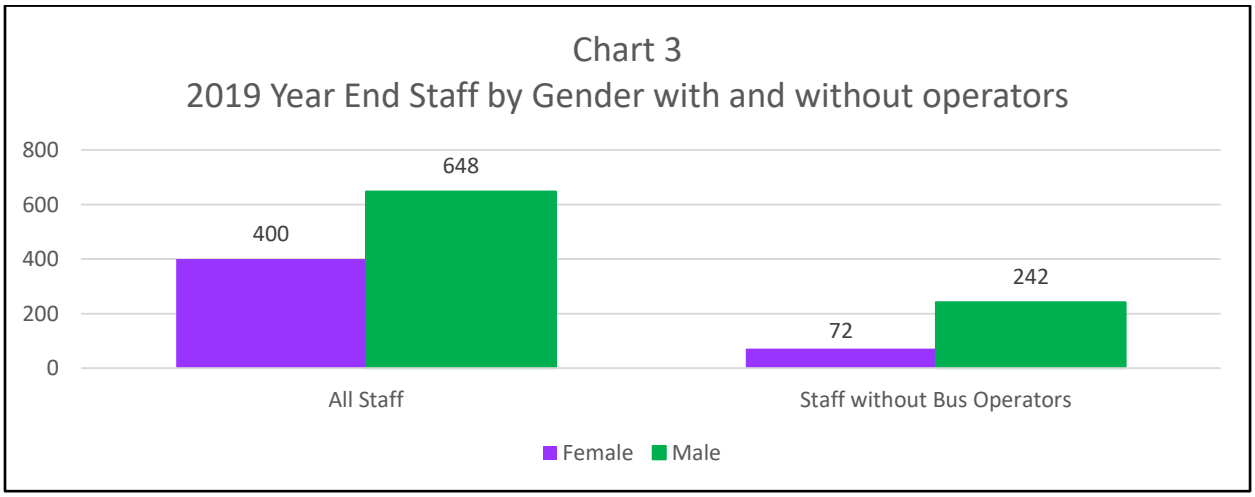
*Percentage was reported combined for semi-skilled and skilled.
Source: Audit Services Division created table based upon data from MCTS's EEO Plan submittal.

Staff Demographic Data by Gender

MCTS showed a large disparity when reviewing the workforce by gender versus the Census estimates for gender in 2019.

In 2019, Milwaukee County population was estimated to be 52% female by the Census Bureau. Overall MCTS staff is 38% female, without operators it drops to 23% female.

In 2019, 38% of the MCTS's overall workforce was female. In 2019, the Census Bureau reported the Milwaukee County population to be 52% female. Analyzing the breakdown of MCTS staff by gender without the operators shows a decrease in the percentage of female employees to 23%. Chart 3 shows the breakdown of MCTS's overall workforce and the workforce without operators by gender for 2019.

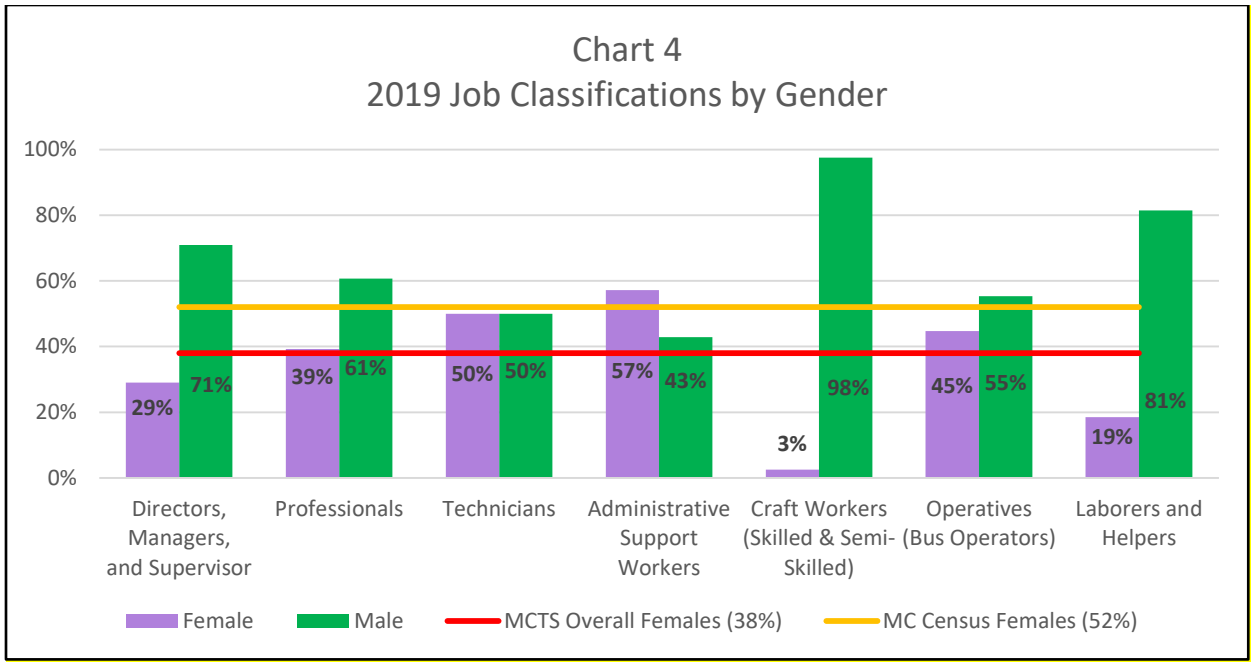


Source: Audit Services Division created chart based upon data from MCTS's Human Resources system.

Analyzing staff distribution by job classification by gender shows a range of females in the workforce from 3% at the low end to 57% at the high end. Craft Workers have the lowest percentage with four females out of 120 employees.

MCTS staff is broken into seven job classifications per its FTA EEO Program. We conducted a workforce analysis of job classification by gender to see if the distribution of staff was consistent across job classifications. The overall workforce level for females at MCTS in 2019 was 38% while the Census population estimate for Milwaukee County is 52%. The job classification that most closely matches the Census data was the Technicians which is 50% female but only contains four employees.

We found four job classifications that had a large variance to MCTS's overall female workforce level. The Craft Workers are 3% female, the Laborers and Helpers are 19% female and Directors, Managers and Supervisors are 29% female. Administrative Support Workers were 57% female. Chart 4 displays the job classifications by gender for MCTS for 2019.



Numbers may not add to 100% due to rounding.
Source: Audit Services Division created chart based upon data from MCTS's Human Resources system.

As a part of its EEO plan submitted to the FTA MCTS is required to report on past utilization goals by gender staffing percentages. Table 4, which is based upon MCTS's January 28, 2020 submittal to the FTA, shows the job groups that had a goal included in the EEO plan and the current percentage of staff.

Table 4
MCTS EEO Plan Goals for Female Employees and Actual Percentages as of January 28, 2020

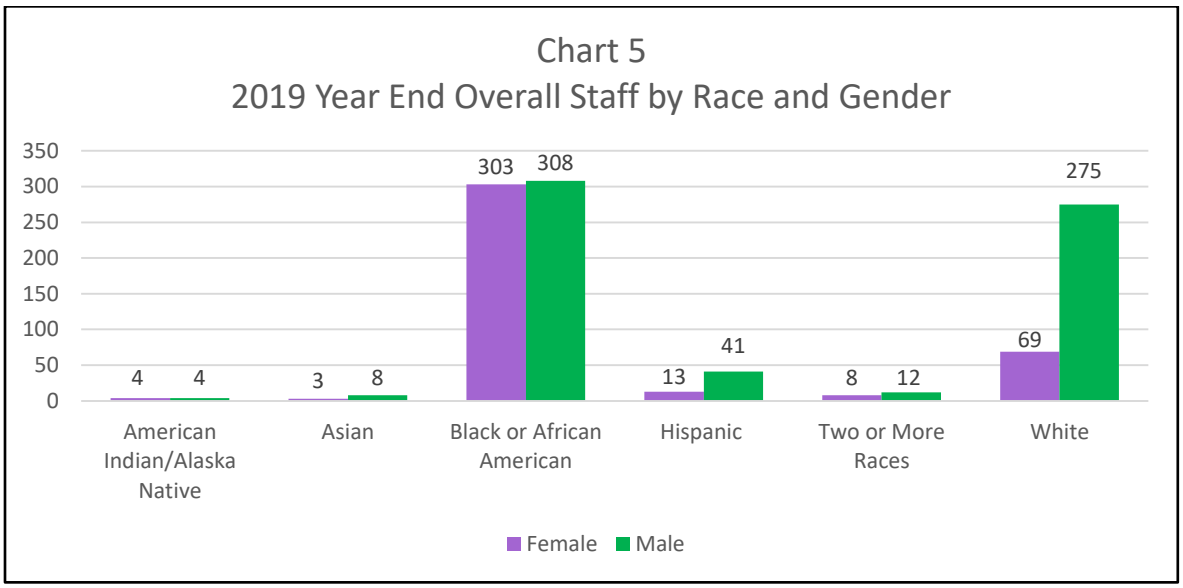
Job Group	Utilization Goal	Actual % of Female Employees
Supervisors	57%	27%
Technicians	26%	50%
Office & Clerical Workers	75%	58%

Source: Audit Services Division created table based upon data from MCTS's EEO Plan submittal.

Staff Demographic Data by Race and Gender

We found a wide range of gender distribution amongst racial groups with the highest being the Black or African American and American Indian/Alaska Native racial groups nearly matching the countywide percentage. The white racial group was the lowest at 20%.

Chart 5 shows the staff by racial group and gender for MCTS's overall workforce as of December 31, 2019.



Source: Audit Services Division created chart based upon data from MCTS's Human Resources system.

We compared the data to both the Census estimates of females in Milwaukee County's population which is 52% and to MCTS's overall percentage of female employees which is 38%. We found:

- Black or African American and American Indian/Alaska Native females nearly matched the countywide percentage of females comprising 50% of the staff from this racial group.

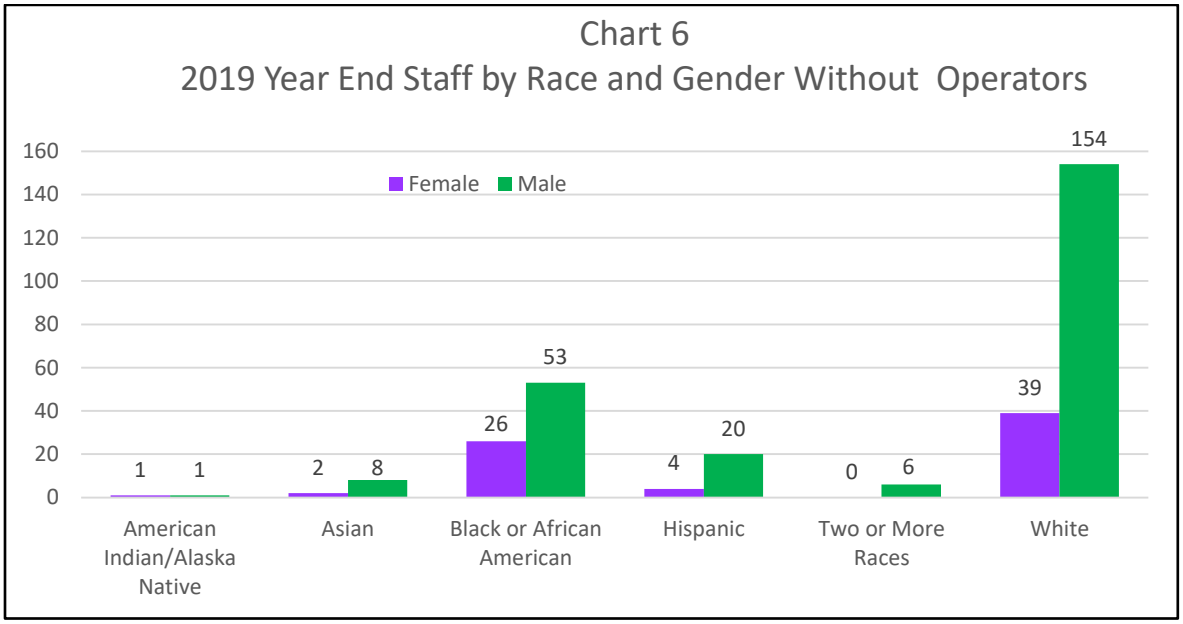
For overall staff, female representation with racial groups ranged from a low of 20% to a high of 50%.

- Of the 20 Two or more races employees, eight were female and they were 40% of the racial group.
- Of the 11 Asian employees, three were female and they were 27% of the racial group.
- Of the 54 Hispanic employees, 13 were female and they were 24% of the racial group.
- White females were the lowest percentage of their racial group with 20% of the white racial group being female employees.

Without operators, female representation dropped to 0% for the Two or more races racial group and to 17% for the Hispanic racial group.

For non-operator staff, female representation within racial groups ranged from a low of 0% to 50%.

Removing operators from the workforce numbers reveals a greater disparity by gender and race. Chart 6 shows the staff by racial group and gender for MCTS's workforce without operators as of December 31, 2019.



Source: Audit Services Division created chart based upon data from MCTS's Human Resources system.

We compared the data to both the Census estimates of females in Milwaukee County's population which is 52% and to MCTS's percentage

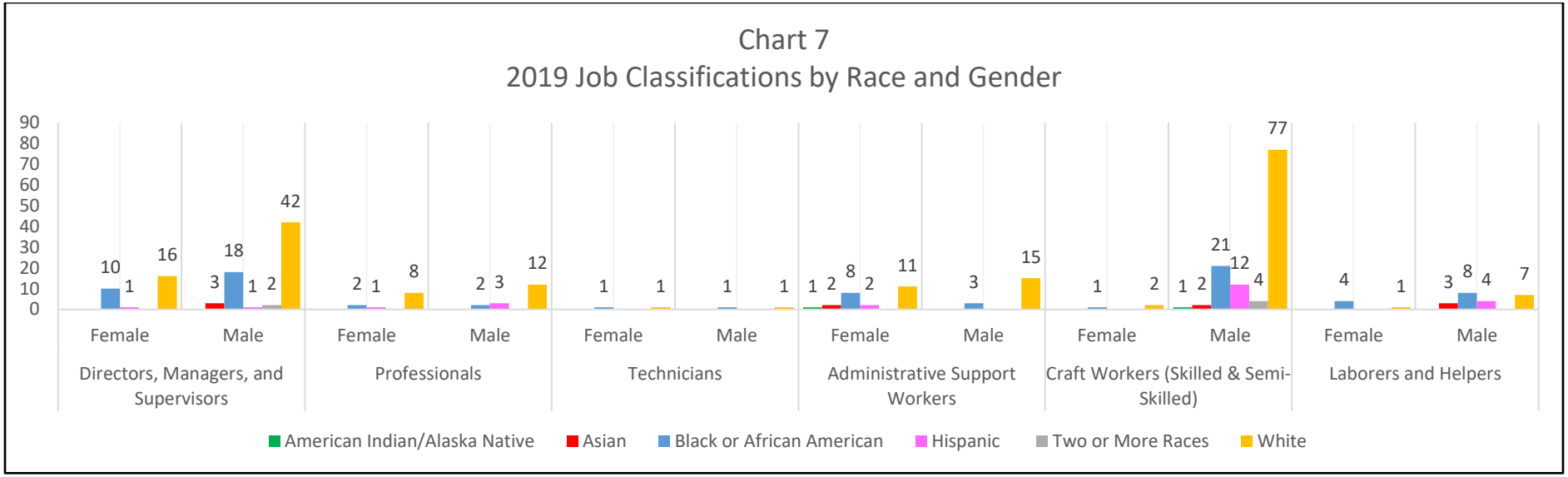
of female employees without operators which is 23%. We found:

- The American Indian/Alaska Native racial group had two employees one from each gender.
- Asian females were 20% of their racial group.
- Black or African American females were 33% of their racial group.
- Hispanic females were 17% of their racial group.
- Two or more races had no female employees.
- White females were 20% of their racial group.

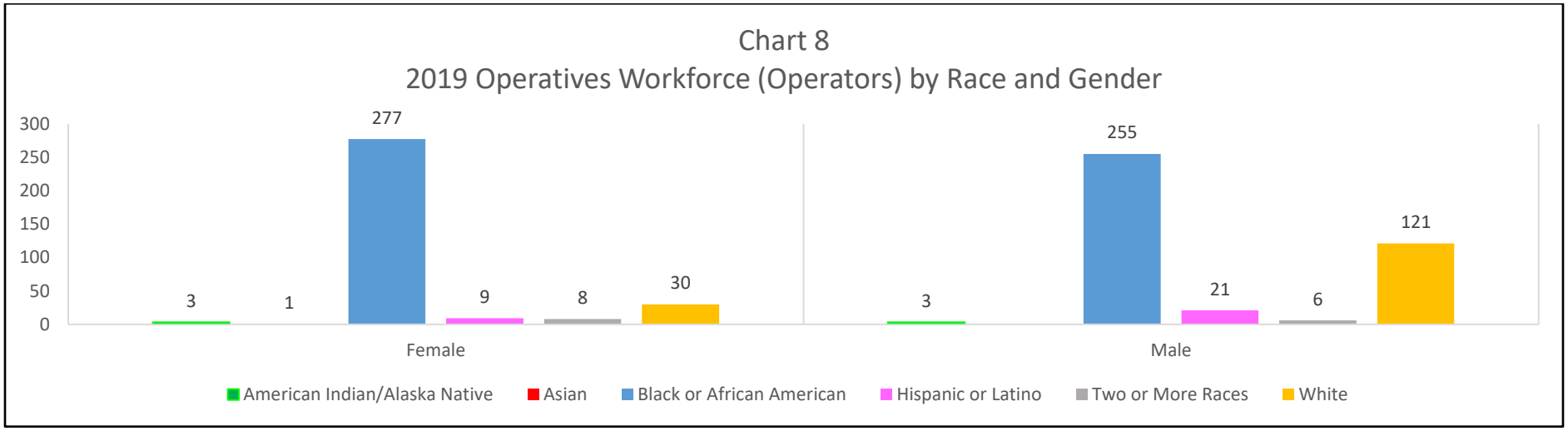
Analyzing staff distribution by race and gender and job classification showed the Administrative Support Workers were the most diverse job classification.

For operators the job classification was 38% Black or African females versus this group being 29% of the overall staff.

Chart 7 shows the staff by racial group and gender for six of the seven job classifications at MCTS. Due to 70% of the employees being in the Operatives job classification, this data was included in a separate chart for ease of presentation. White males were 45% of Directors, Managers and Supervisors and 64% of the Craft Workers job classification employees. The largest group for operators were Black or African American females who were 38% of all operators. Chart 8 displays this data.



Source: Audit Services Division created chart based upon data from MCTS's Human Resources system.



Source: Audit Services Division created chart based upon data from MCTS's Human Resources system.

Section 2: We found variances in average salaries for both race and gender at MCTS with a greater disparity occurring as pay increases.

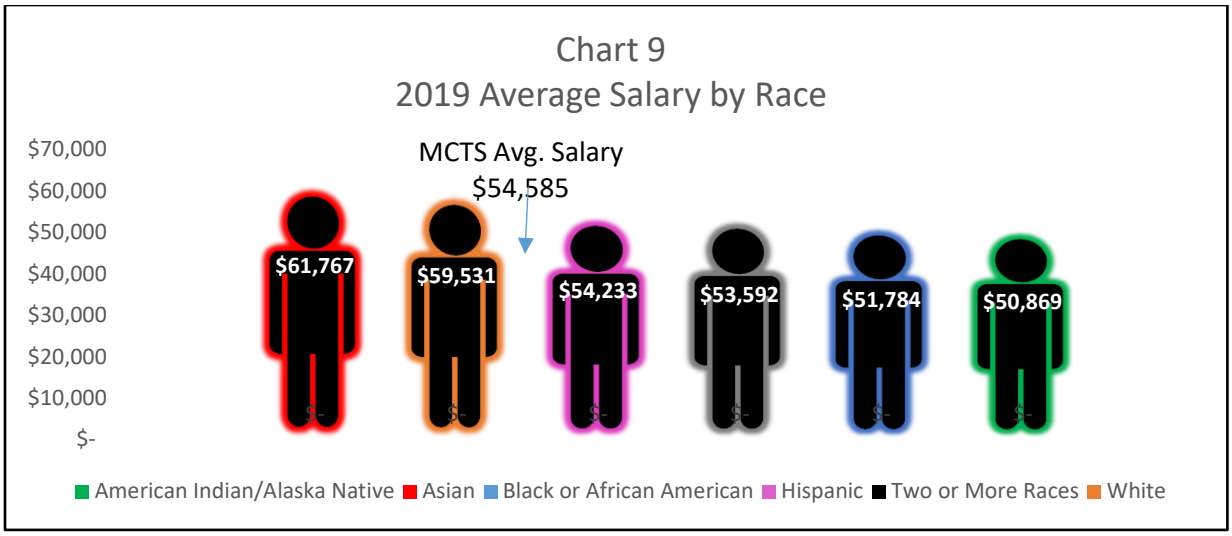
Salaries by Race

Only two racial groups, Asian and white, out of six earned in excess of the average salary of $54,585 in 2019.

MCTS has a smaller range of average salaries by race due to 44% of the staff earning the same amount, $53,560.

For 2019, we reviewed the Human Resources data for any employee who was employed during 2019. The average salary earned at MCTS was $54,585. It should be noted that of the 1,048 employee Human Resources records we reviewed there was a group of 459 employees that earned $53,560. This concentration of employees at one salary may cause a much smaller variance to the average salary.

In 2019, we found that the Asian racial group and the white racial group earned in excess of the average salary while the remaining four racial groups, American Indian/Alaska Native, Black or African American, Hispanic and Two or More Races, earned below the average. The eight members of the American Indian/Alaska Native racial group were the lowest average earners with an average of $50,869. Chart 9 shows the average salary earned for each racial group in 2019.



Source: Audit Services Division created chart based upon data from MCTS's Human Resources system.

When analyzing salary data at three sets of earners, we found only the Black or African American and white racial groups with substantial variances as income increased.

The Black or African American racial group was 76% of the bottom set and 28% of the top set. The white racial group was 14% of the bottom set and 62% of the top set.

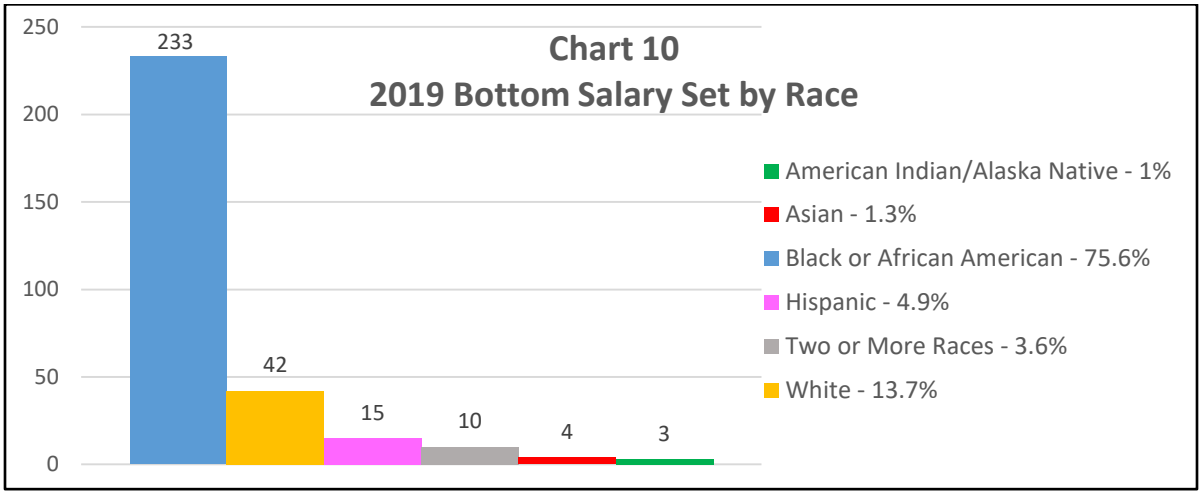
In addition to reviewing the overall average salary by race we looked at the racial distribution at different salary levels. We grouped the employees by race into three salary sets. Since there were 459 employees who earned $53,560 these employees were grouped together in the mid-range of salaries. There were 307 employees who earned less than $53,560 and these employees comprise the bottom set of employees for salaries. The 282 employees earning in excess of $53,560 comprise the top set of employees for salaries. We found:

- The Black or African American racial group was the largest racial group for both the bottom and middle salaries set. In the bottom salary set, this racial group was 76% of employees and 65% in the middle salary set compared to 58% of MCTS's overall workforce. This racial group was 28% of the top salary set.

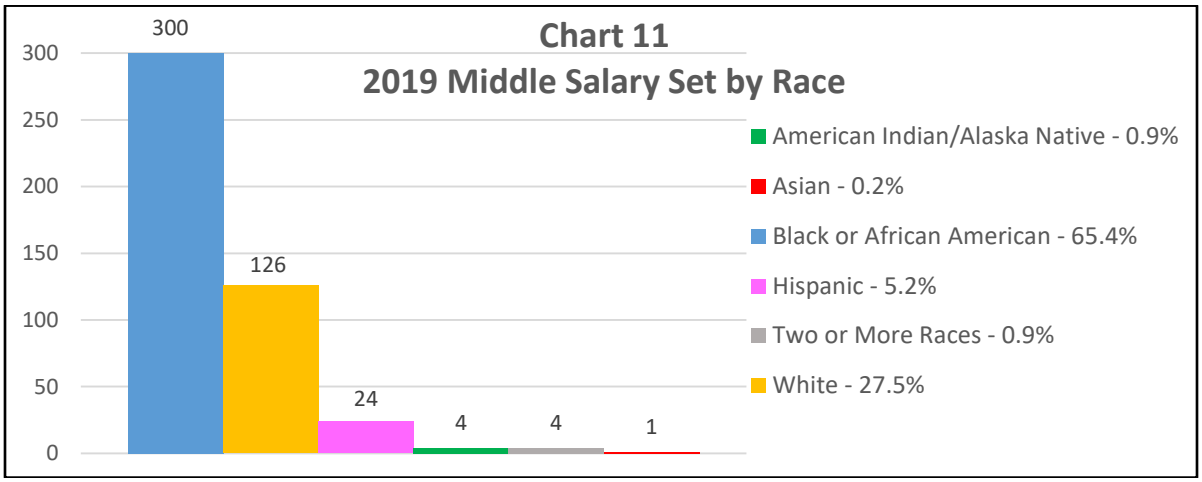
- The white racial group was 14% of the lowest salary set and 62% of the top salary set. This racial group was 33% of MCTS's overall workforce.

- The remaining racial groups showed minimal variance in their percentages at the three sets of salaries that we analyzed.

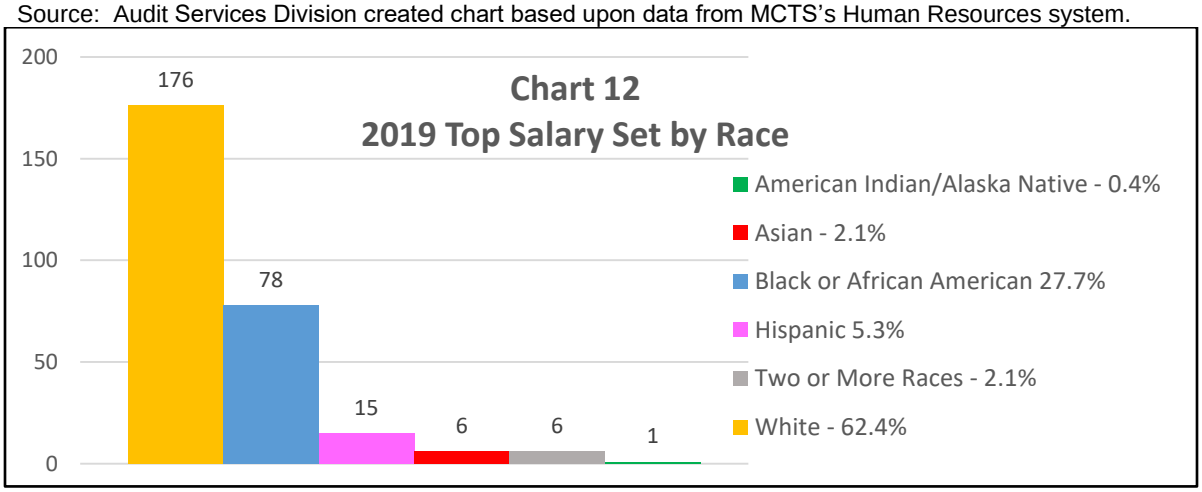
Charts 10 to 12 display the three sets of salaries by race.



Source: Audit Services Division created chart based upon data from MCTS's Human Resources system.



Source: Audit Services Division created chart based upon data from MCTS's Human Resources system.



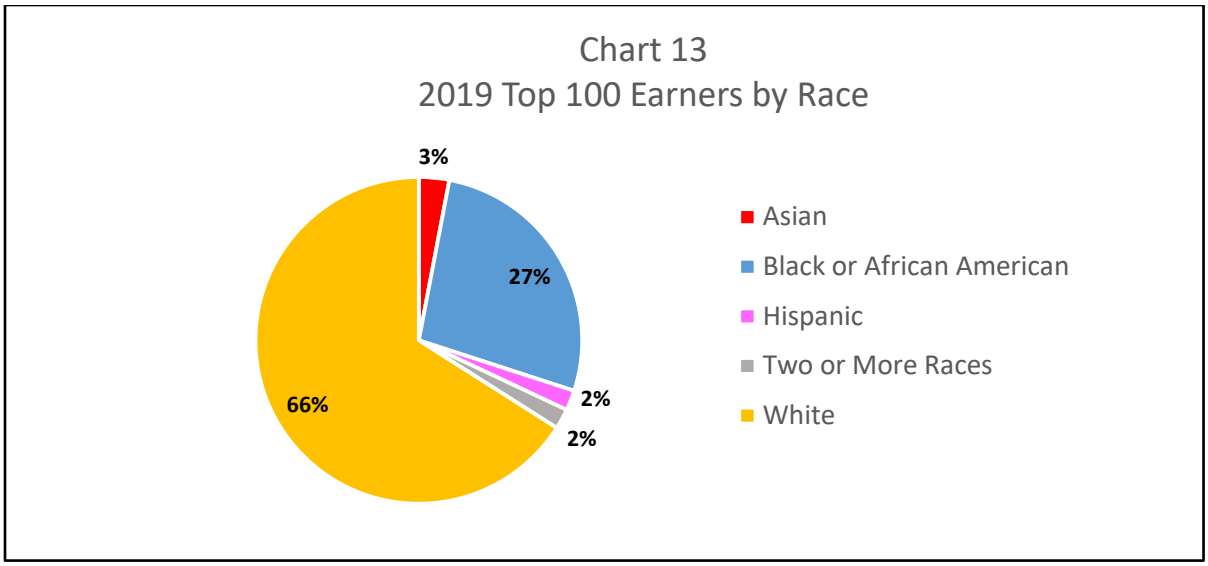
Source: Audit Services Division created chart based upon data from MCTS's Human Resources system.

For the top 100 earners, the Black or African American racial group exceeded their Census percentage but fell below their workforce numbers while the white racial group exceeded both their Census percentage and their overall workforce numbers.

Using MCTS's Human Resources system to conduct a portion of our analysis, we calculated the top 100 earners at MCTS in 2019 to see if there was any variance by race at the highest salary levels. We found:

- 66% of the top earners were from the white racial group compared to 33% of the workforce overall.
- 27% of the top earners were from the Black or African American racial group compared to 58% of the workforce overall.
- 3% of the top earners were from the Asian racial group compared to 1% of the workforce overall.
- 2% of the top earners were from the Hispanic racial group compared to 5% of the workforce overall.
- 2% of the top earners were from the Two or more races racial group which matches their percentage of the workforce overall.
- There were no employees from the American Indian/Alaska Native racial group in the top earners.

Chart 13 shows the breakdown by race of the top 100 earners.

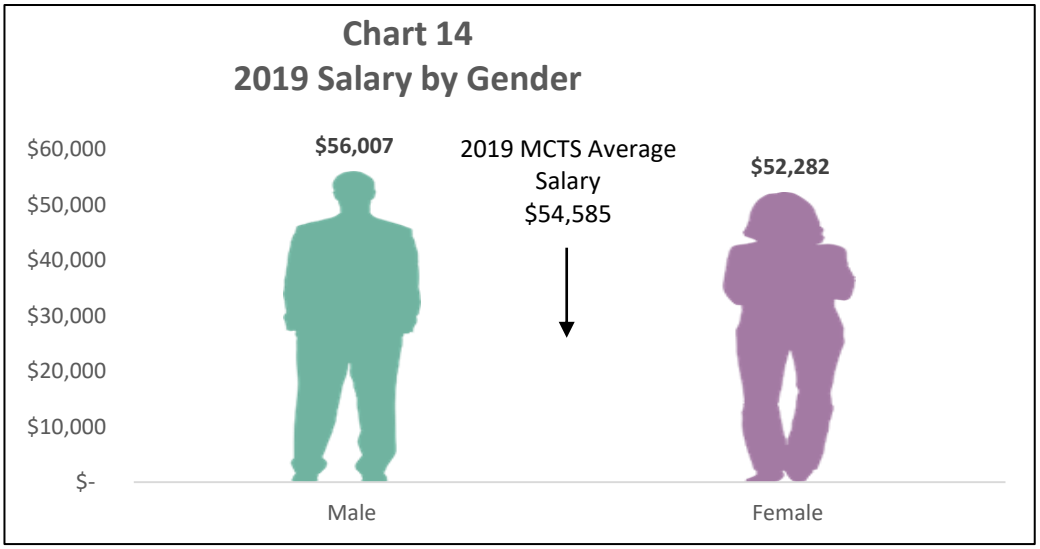


Source: Audit Services Division created chart based upon data from MCTS's Human Resources system.

Salaries by Gender

The salary gap between genders was $3,725 in 2019.

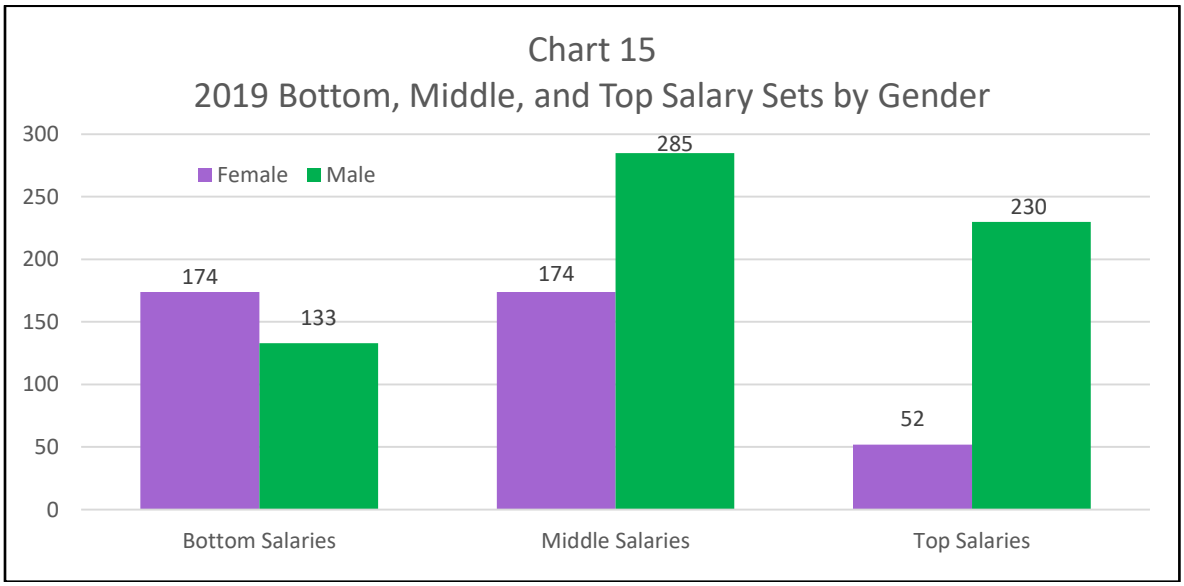
The overall average salary at MCTS in 2019 was $54,585. Male employees earned an average of $56,007 which was $3,725 more than females who averaged $52,282. Chart 14 shows the average salary by gender in 2019.



Source: Audit Services Division created chart based upon data from MCTS's Human Resources system.

Female representation drops from 57% at the lowest salary set to 18% at the highest salary set.

We conducted an analysis of the three salary sets for gender in addition to race for 2019. The overall workforce at MCTS is 38% female. We found that females are a higher percentage at the lowest salary set than the overall workforce at MCTS. Females are 57% of the employees in the lowest salary set. The middle salary set exactly matches the overall workforce at 38% female. At the top set of salaries only 18% were female. Chart 15 displays the distribution by gender in all three sets of salary.

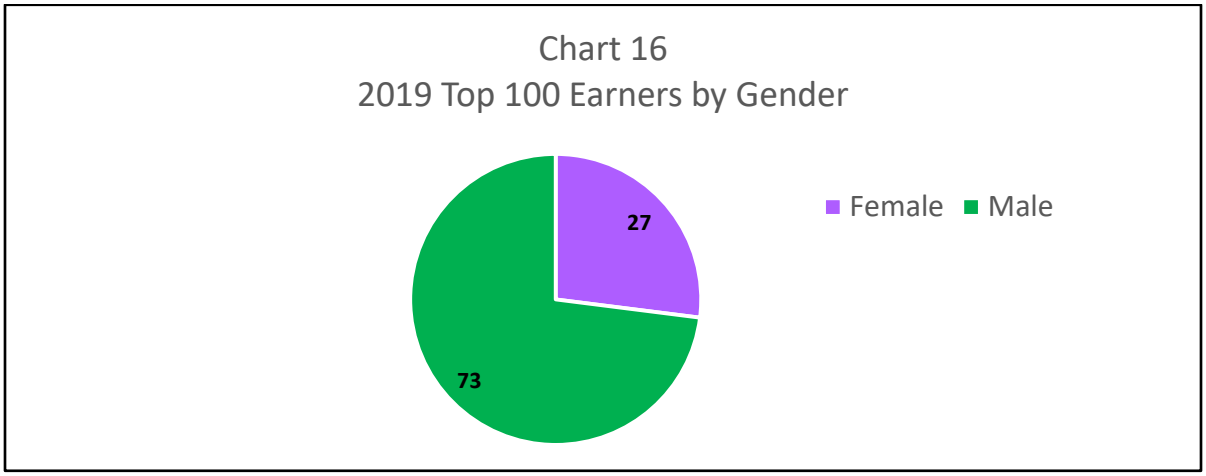


Source: Audit Services Division created chart based upon data from MCTS's Human Resources system.

Of the top 100 earners there were 27 females and 73 males.

Because we used Human Resources data to conduct a portion of our analysis, we calculated the top 100 earners at MCTS in 2019 to see if there was any variance by gender at the highest salary levels. We found 27% of the top 100 earners were female versus 38% of the overall workforce at MCTS. Chart 16

displays the top 100 earners at MCTS in 2019 by gender.



Source: Audit Services Division created chart based upon data from MCTS's Human Resources system.

Salaries by Race and Gender

White females were the group with the second highest average income and the only racial group where females earned more than males.

We analyzed average salary data for MCTS staff in 2019 by race and gender. We found:

- Asian males were the highest average earners at MCTS in 2019 with an average salary of $64,178. There were eight Asian males employed in 2019.
- White females were the second highest group and the only racial group where females earned more than males. White females had an average salary of $59,723.
- White males earned $59,483 just slightly less than White females.

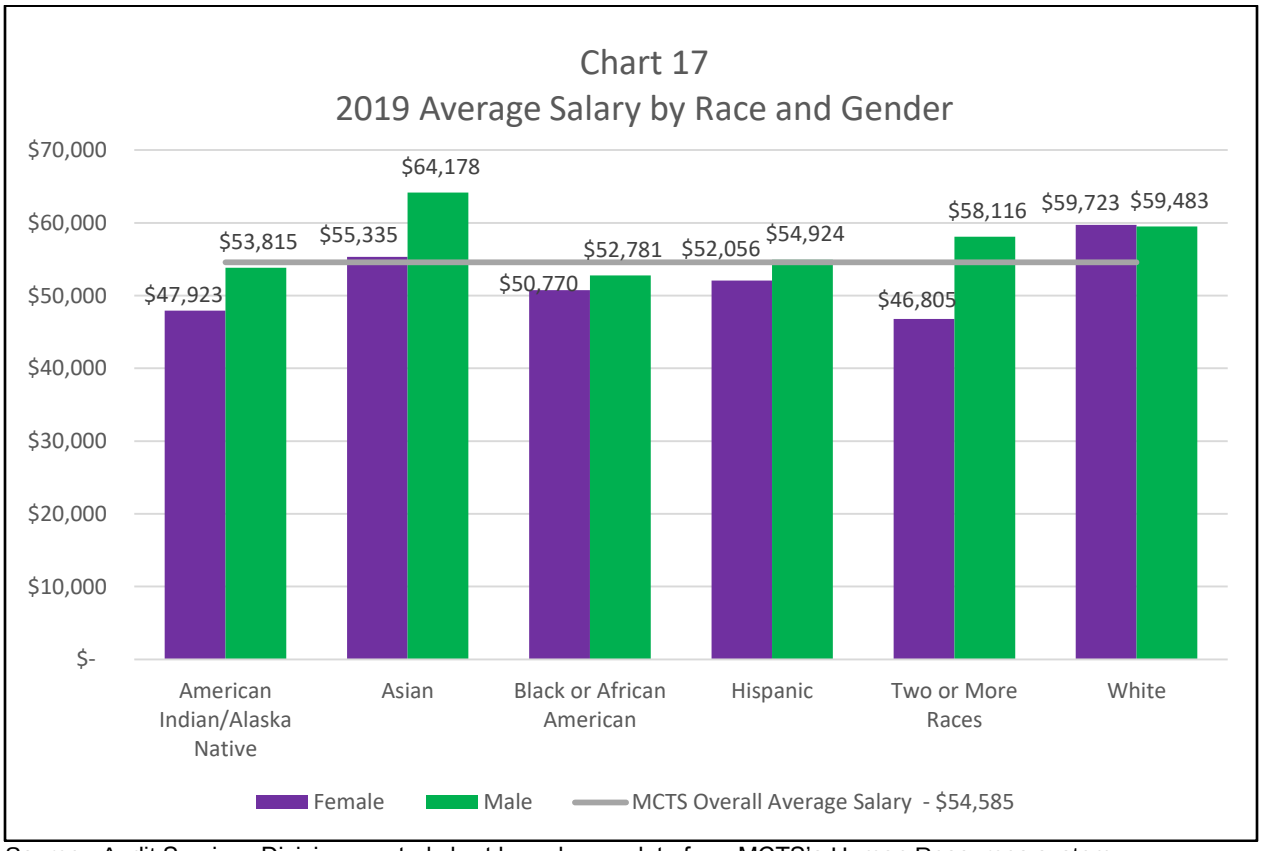
The lowest average earners were females from the Two or more races racial group.

Earning below the average were both genders of American Indian/Alaska Native and Black or African Americans along with females from both the Hispanic and Two or more races racial groups.

- The lowest average earners were Two or more races females at $46,805. This group had the largest gender gap with females earning on average $11,311 less than males.

- Earning below MCTS's overall average salary were American Indian/Alaska Native females and males, Black or African American females and males, Hispanic females and Two or more races females.

Chart 17 shows the average salary by race and gender for 2019.



Source: Audit Services Division created chart based upon data from MCTS's Human Resources system.

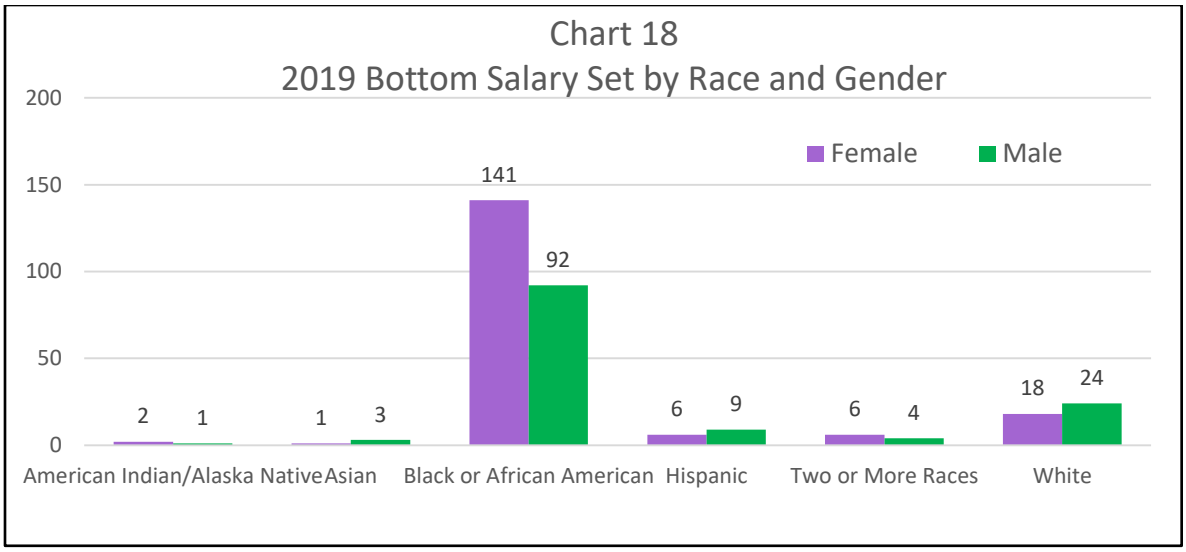
When reviewing salaries at three sets by race and gender we found that Black or African American females were 46% of the lowest set and 7% of the highest set. White males were 8% of the lowest set and 52% of the highest set.

We conducted an analysis of the three salary sets for race and gender. We found:

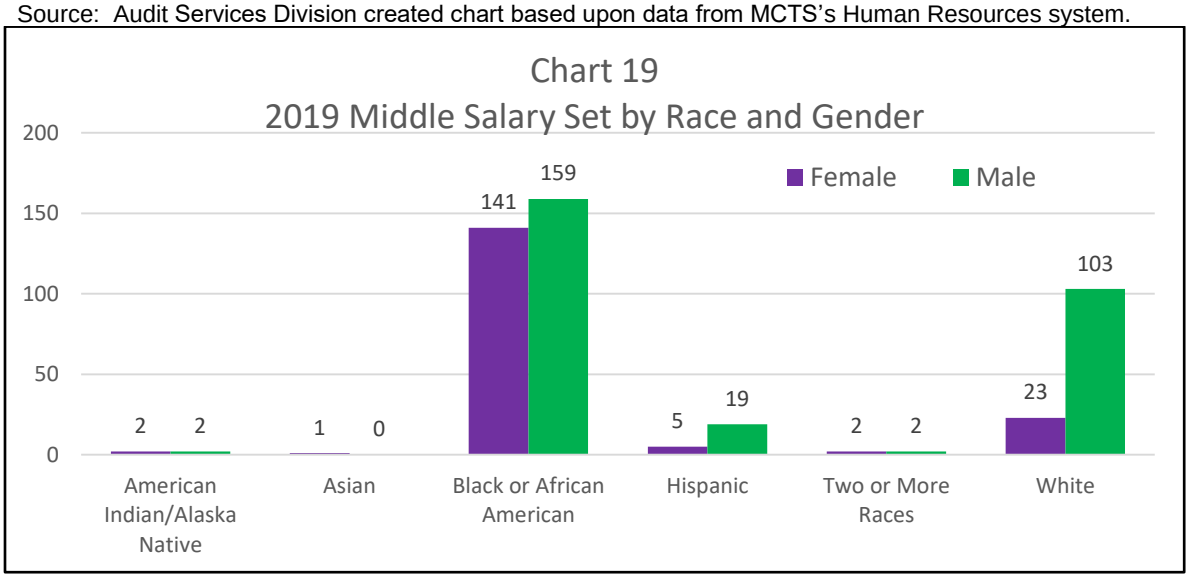
- Black or African American females were 46% of the lowest salary set and 29% of MCTS's overall workforce.
- White males were 8% of the lowest salary set and 26% of MCTS overall workforce.
- All groups in the mid-range set had percentages that were within five percentage points of their overall workforce levels.
- At the highest salary levels Black or African American females were 7% of the highest salary set and 29% of the overall workforce. Black or African American males were 20% of the highest salary set and 29% of MCTS overall workforce. White males were 52% of the highest salary set and 26% of the overall workforce. All other groups were within three percentage points of their overall workforce levels.

All groups in the mid-range set had percentages that were within five percentage points of their overall workforce levels.

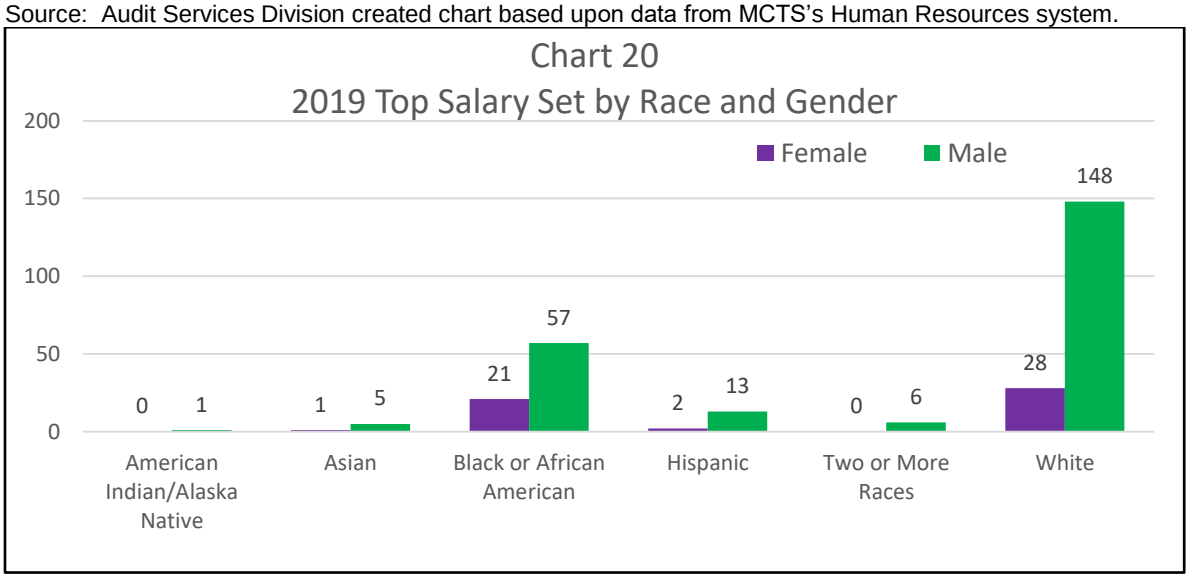
Charts 18 to 20 displays the three salary sets at MCTS by race and gender.



Source: Audit Services Division created chart based upon data from MCTS's Human Resources system.



Source: Audit Services Division created chart based upon data from MCTS's Human Resources system.



Source: Audit Services Division created chart based upon data from MCTS's Human Resources system.

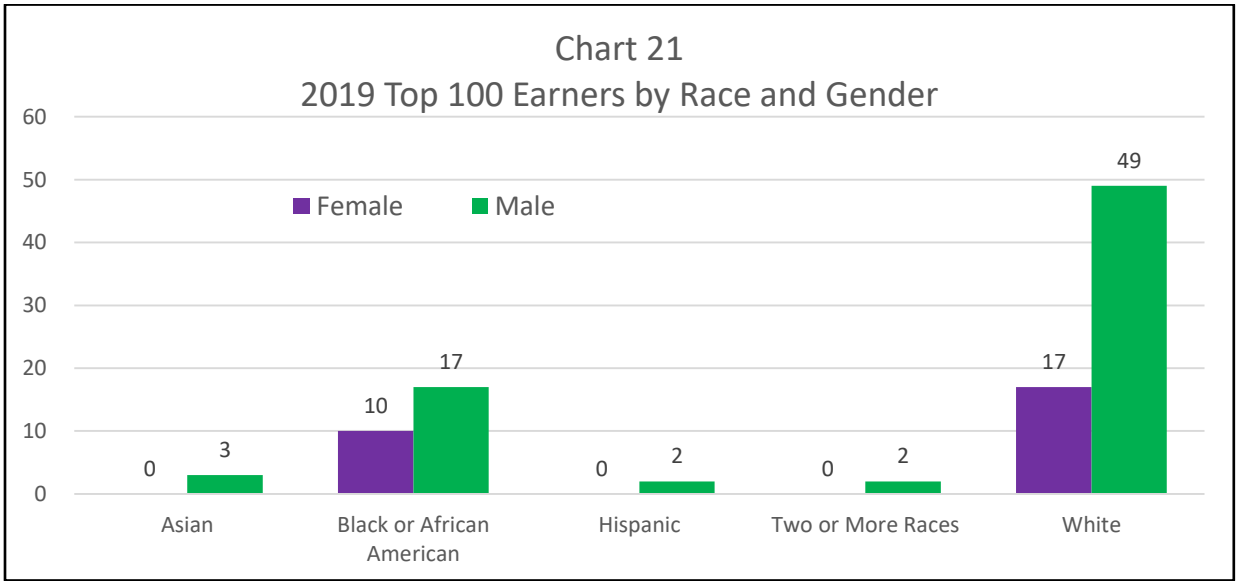
In the top 100 earners there were no American Indian/Alaska Natives of either gender and no females from the Asian, Hispanic or Two or more races racial groups.

We calculated the top 100 earners at MCTS by race and gender in 2019. We found:

- No American Indian/Alaska Natives of either gender, no Asian females, no Hispanic females and no Two or more races females are in the top 100 earners.
- 10% of the top 100 earners were Black or African American females versus 29% of the overall workforce at MCTS.
- 17% of the top 100 earners were Black or African American males versus 29% of the overall workforce at MCTS.
- 17% of the top 100 earners were white females versus 7% of the overall workforce at MCTS.
- 49% of the top 100 earners were white males versus 26% of the overall workforce at MCTS.

Whites of both genders had a higher percentage in the top 100 earners than their overall workforce percentage.

Chart 21 displays the top 100 earners by race and gender.



Source: Audit Services Division created chart based upon data from MCTS's Human Resources system.

Section 3: A review of policies and procedures and numerous field interviews along with an analysis of hiring and separations by race and gender show positive developments when looking simply by race but issues remain when looking at gender.

Hiring and Separation Data from 2019

While the creation and implementation of policy and procedures are an important part of any hiring process the impact of those policies and procedures is key. Therefore, we analyzed hiring and separation data from the Human Resources system for calendar year 2019. MCTS hired 165 new employees in 2019.

We looked separately at promotions so the hires we analyze here are for employees new to MCTS. Analysis of promotions follows later in the section.

Overall hiring data from 2019 shows the white racial group as the only group hired at a rate lower than its percentage of the overall workforce.

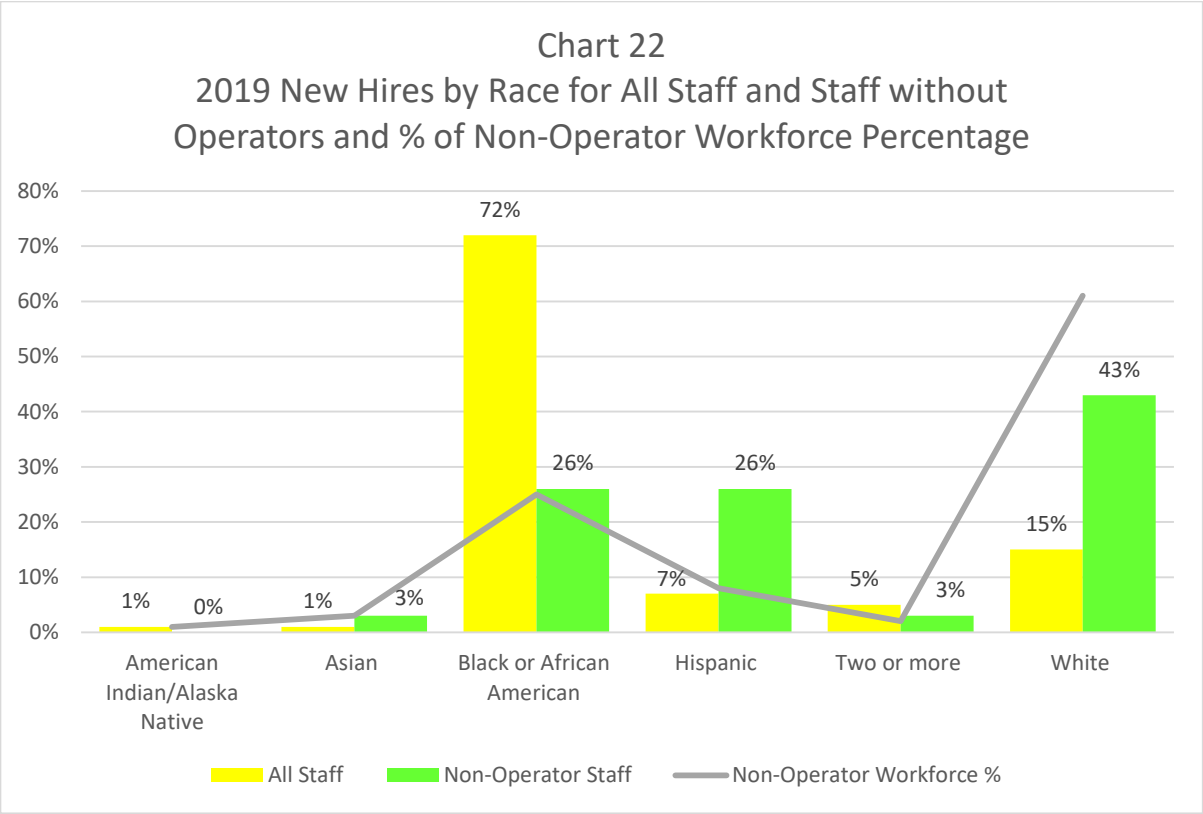
In 2019, 72% of all hires were from the Black or African American racial group compared to 58% of MCTS's overall workforce. The white racial group was 15% of all hires versus 33% of the overall workforce. The Hispanic racial group was 7% of all hires versus 5% of the overall workforce.

Without operators the white racial group remains the only group hired at a rate lower than its share of the workforce, but the percentage of hires increased from 15% to 43%.

Analyzing the hiring of staff without operators has an impact on the hiring percentages. This is partially driven by the sheer volume of operators employed at MCTS. Of the total hires of 165 employees in 2019, 130 or 79% were operators. Chart 22 shows the 2019 hires by racial group for all staff and for the 35 non-operator positions that were filled in 2019. For the non-operator hiring we found:

Black or African Americans went from 72% of all hires to 26% of non-operator hires.

- The Hispanic racial group was 26% of the 2019 hires versus being 8% of the non-operator workforce.
- The white racial group was 43% of the hires versus being 61% of the non-operator workforce.
- Members of the Two or more races and the Black or African American racial groups were within 1% of their non-operator workforce percentage.
- The Asian racial group was 3% of the hires and 3% of the non-operator workforce.
- There were no American Indian/Alaska Natives hired.

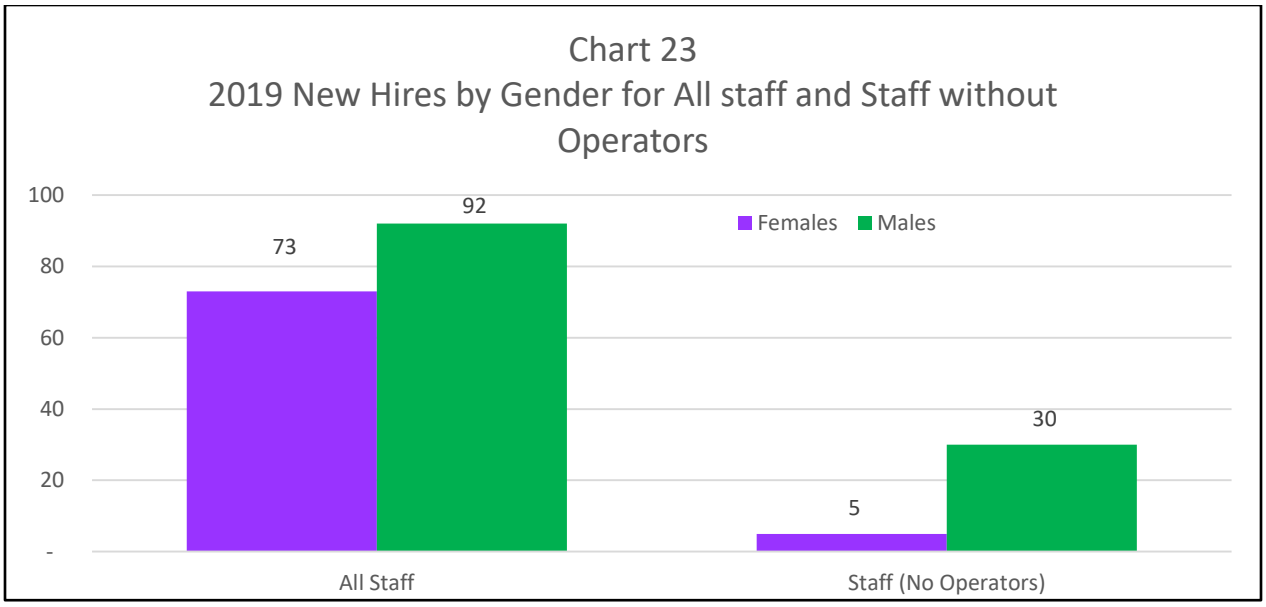


Note: Percentages may not add up to 100% due to rounding.
Source: Audit Services Division created chart based upon data from MCTS's Human Resources system.

Hiring Data by Gender

Overall hiring data from 2019 shows females were 44% of all hires and 14% of non-operator hires.

Chart 23 shows the hires by gender at MCTS for the overall workforce and the workforce without operators. Overall, 44% of all hires in 2019 were female compared to 38% of MCTS's workforce. The percentage of females hired drops to 14% when operators are removed.



Source: Audit Services Division created chart based upon data from MCTS's Human Resources system.

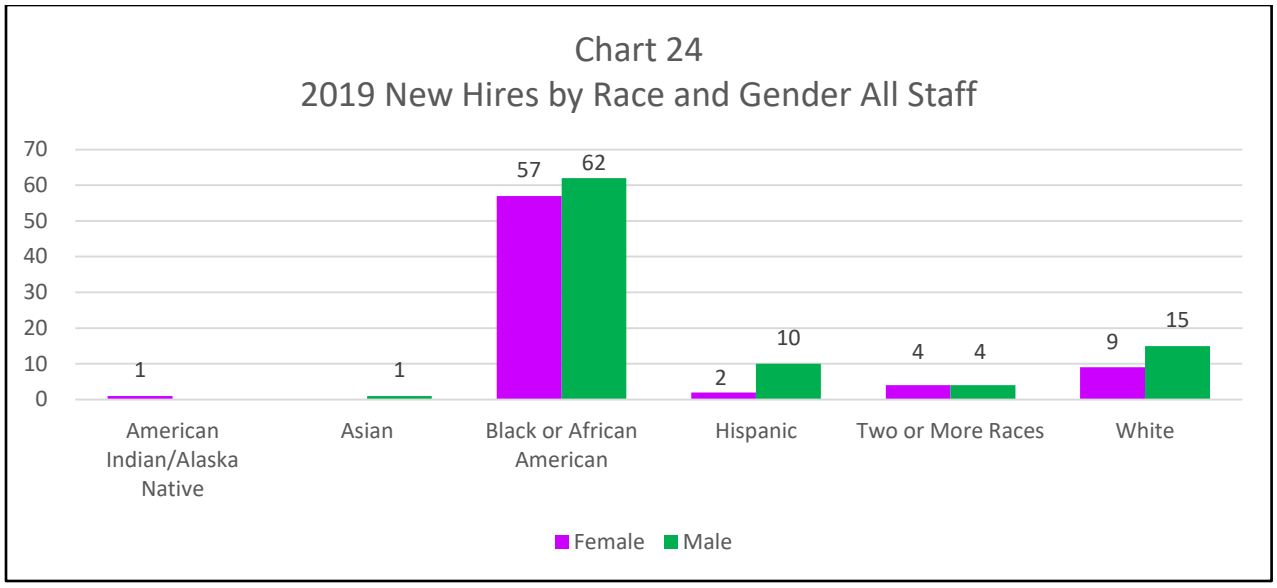
Hiring Data by Race and Gender

For overall hiring, we found that white males had the largest gap between hiring percentage and the workforce percentage being 9% of hires and 26% of the workforce.

Chart 24 shows the hires by race and gender at MCTS for the overall workforce. We found:

- Black or African American females were 35% of hires versus 29% of the workforce while Black or African American males were 38% of hires and 29% of the workforce.
- Hispanic females were 1% of hires and 1% of the workforce. Hispanic males were 6% of hires and 4% of the workforce.
- White females were 5% of the hires and 7% of the workforce while white males were 9% of the hires and 26% of the workforce.

The hiring percentage for Black or African American males was 38% of hires while their share of the workforce was 29%.



Source: Audit Services Division created chart based upon data from MCTS's Human Resources system.

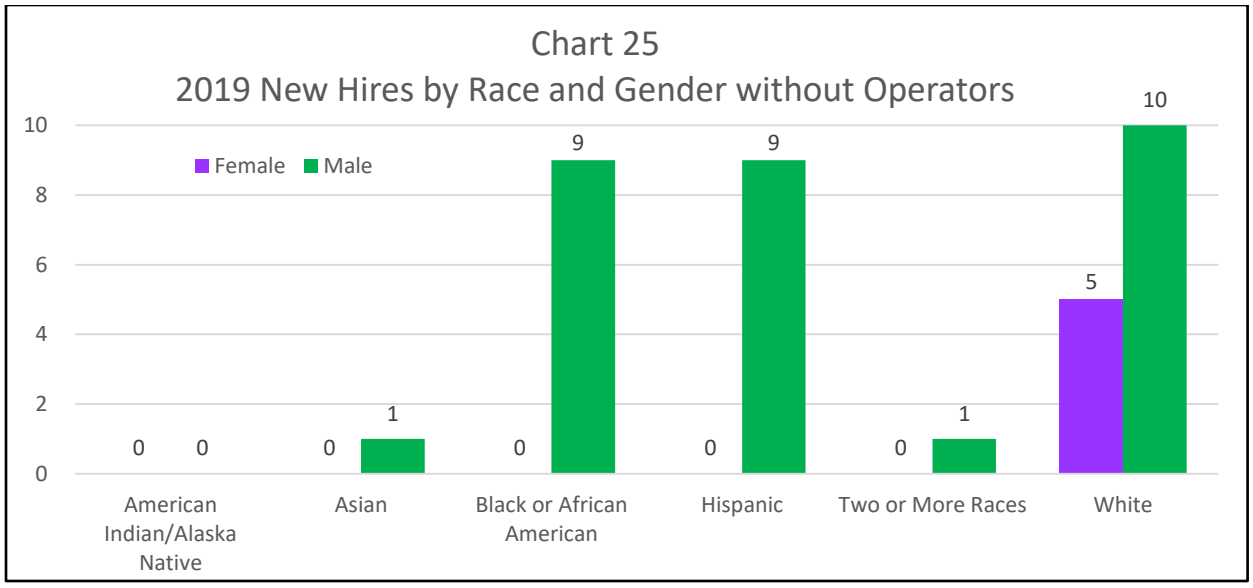
Hiring data without operators shows that all five females that were hired were from the white racial group.

No hires of Asian, Black or African American or Hispanic females occurred. Of the five females hired, all were white females.

We removed the 135 operators from the hiring by race and gender and as shown in Chart 25, for the 35 non-operator positions that were filled, we found:

- No hires of Asian, Black or African American or Hispanic females occurred. Of the five females hired, all were white females.
- No hires of American Indian/Alaska Native of either gender occurred.
- Black or African American males were 26% of hires and 17% of the non-operator workforce.
- Hispanic males were 26% of hires and 6% of the non-operator workforce.
- White males were 29% of the hires and 49% of the non-operator workforce.

Hispanic males were 25% of hires and 6% of the non-operator workforce while white males were 28% of the hires and 49% of the non-operator workforce.

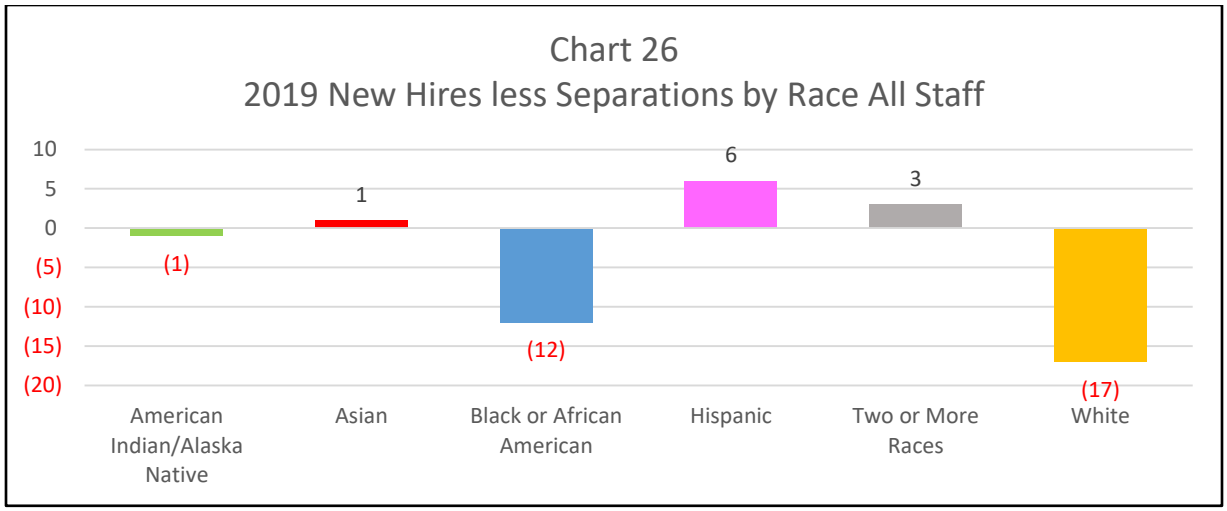


Source: Audit Services Division created chart based upon data from MCTS's Human Resources system.

Hires less Separations by Race

Hires less separations varied across racial groups for the overall workforce with the Hispanic racial group having an increase of six employees and the white racial group with a decrease of 17 employees.

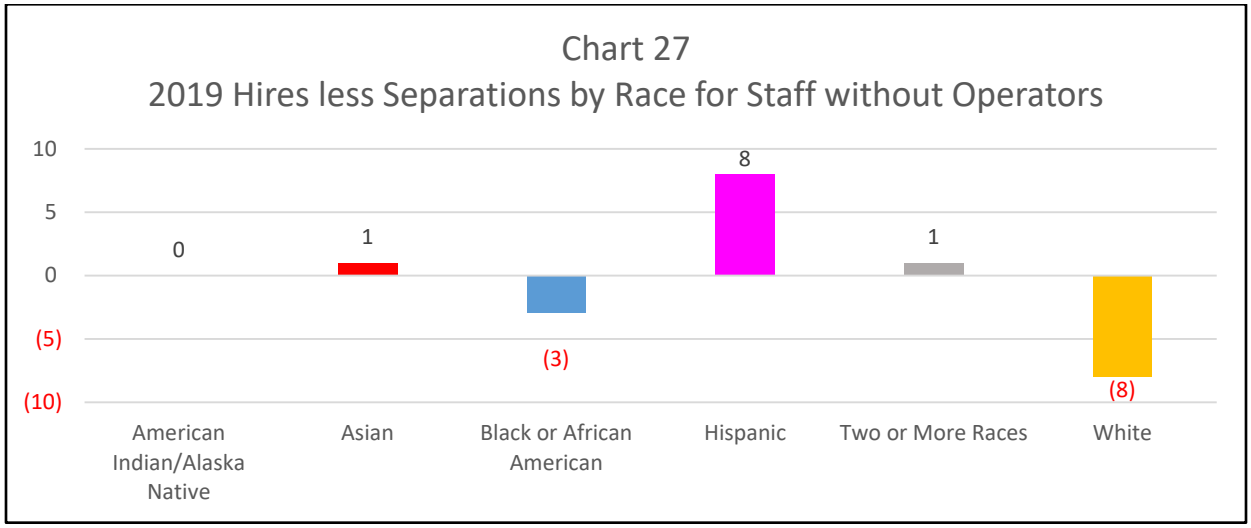
Charts 26 and 27 show the net change by race for the overall workforce and the workforce without operators. The change is the net difference between hires and separations during 2019. Chart 26 shows that for overall staff there was a decrease of one employee from the American Indian/Alaska Native racial group, 12 employees from the Black or African American racial group, and 17 employees from the white racial group. The Asian racial group increased by one employee, the Hispanic group by six employees and the Two or more races group by three employees.



Source: Audit Services Division created chart based upon data from MCTS's Human Resources system.

Removing operators did not impact the racial groups with the largest net increase, the Hispanic racial group nor the largest net decrease, the white racial group.

Chart 27 shows that for the workforce excluding operators, the Black or African American racial group and the white racial group had negative changes while all other racial groups were either neutral or positive net change in 2019. The Hispanic racial group had the largest gain with a positive result of eight due to the hiring of nine members from the Hispanic racial group offset by one separation.



Source: Audit Services Division created chart based upon data from MCTS's Human Resources system.

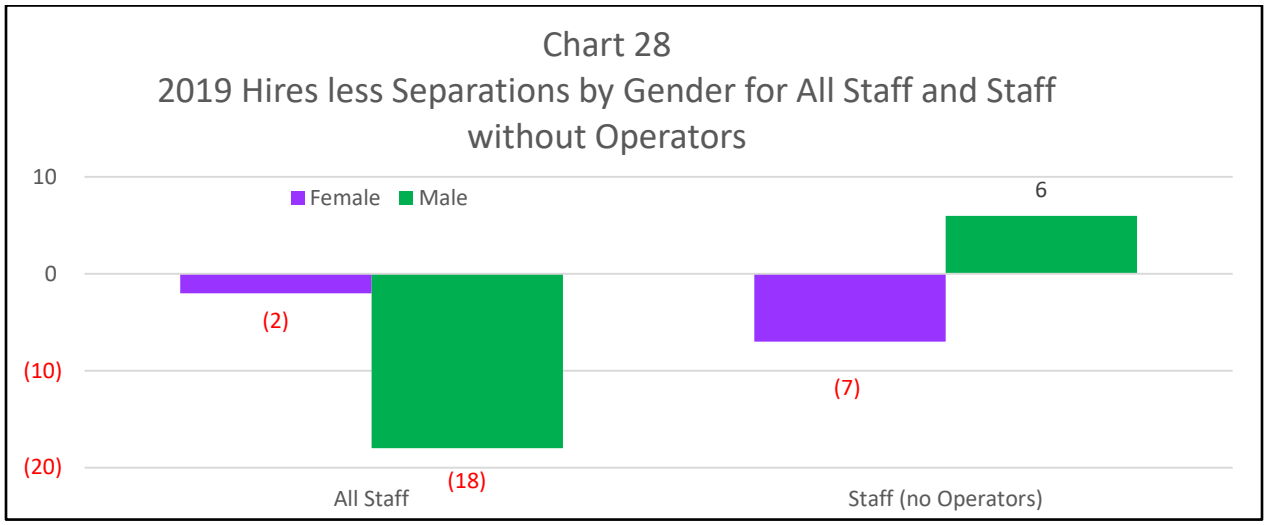
Hires less Separations by Gender

For the staff without operators female employees decreased at a net of seven employees while male employees increased at a net of six employees.

Chart 28 shows the net change by gender for the overall workforce and the workforce without operators. The change is the net difference between new hires and separations during 2019. Chart 28 shows that the female workforce had a net decrease for the overall workforce and for the workforce without operators.

For the overall workforce, female employees decreased by a net of two while male employees decreased by 18.

For the workforce excluding operators, female employees decreased by a net of seven while male employees increased by six.



Source: Audit Services Division created chart based upon data from MCTS's Human Resources system.

Hires less Separations by Race and Gender

When reviewing net change by race and gender for the overall workforce we found that the two groups with the largest net decrease of employees were Black or African American males and white males.

When looking at the net change by race and gender we found that for the overall workforce:

- American Indian/Alaska Native females decreased by one while there was no change for American Indian/Alaska Native males.
- Asian males increased by one while there was no change for Asian females.
- Black or African American females decreased by two while Black or African American males decreased by 10.
- Hispanic females increased by one while males increased by five.
- Two or more races females increased by two while males increased by one.
- White females decreased by two while males decreased by 15.

Hispanic males increased by a net of five employees and white males decreased by a net of 15 employees.

Removing operators from the analysis resulted in Hispanic males having a net increase, Black or African American males and both males and females of the white racial group having a net decrease.

When looking at the net change by race and gender we found that, without operators:

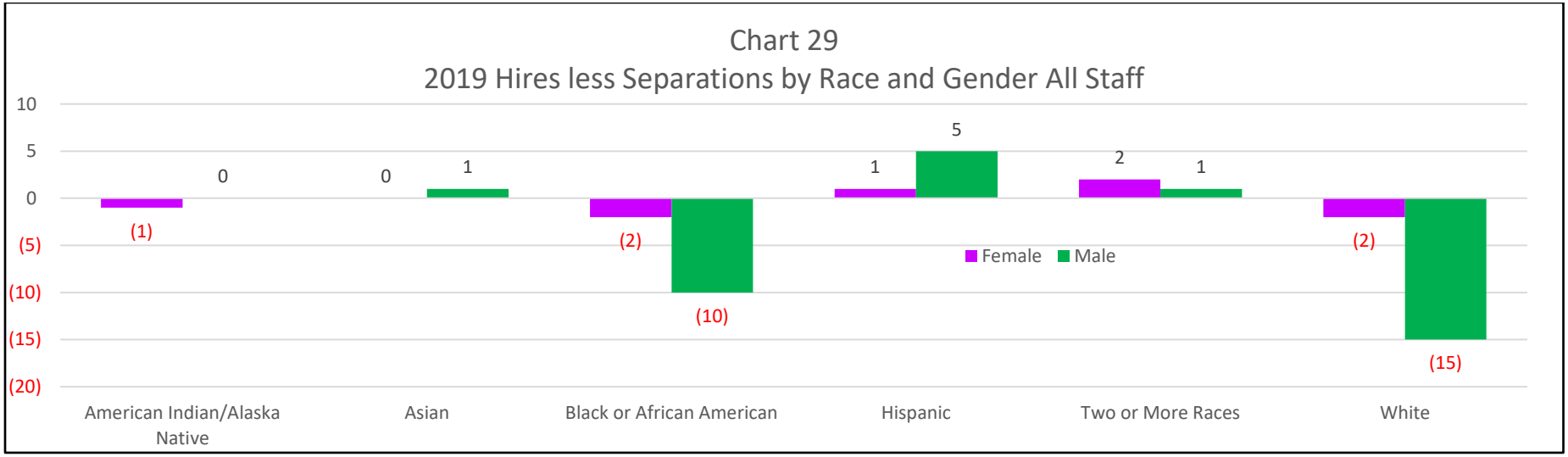
- There was no change for either gender of American Indian/Alaskan natives.
- Asian males increased by one while there was no change for Asian females.
- Black or African American females decreased by a net of 3 while there was no change to Black or African American males.
- Hispanic males increased by eight while there was no change for Hispanic females.
- Two more races males increased by one while there was no change for Two or more races females.

Hispanic males increased by a net of eight employees while there was no change for Hispanic females.

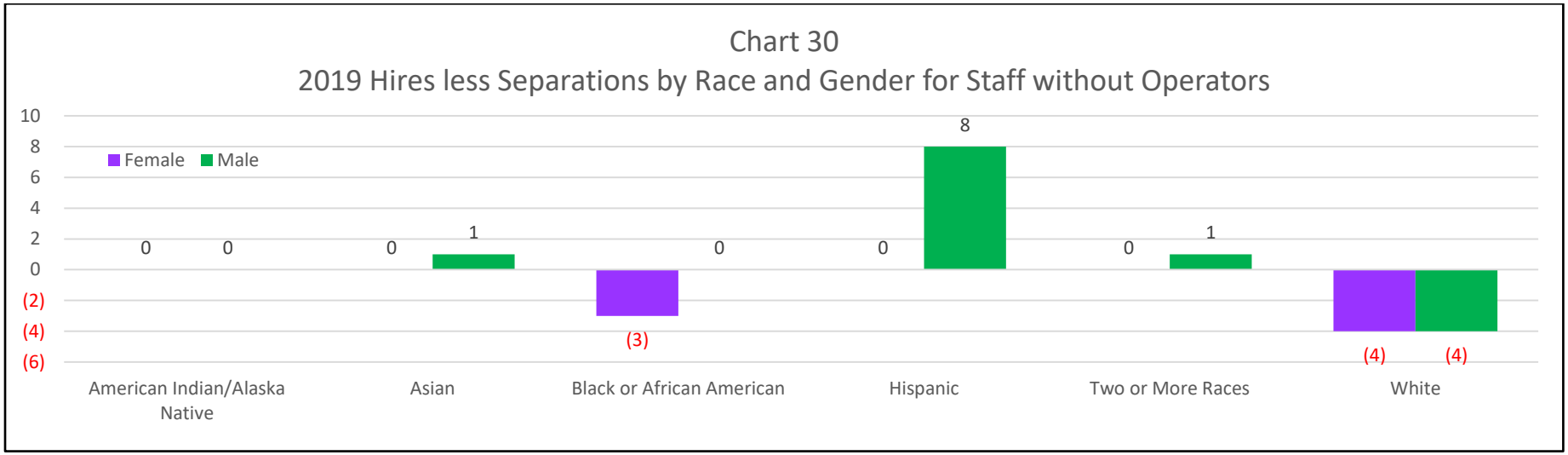
There was a net decrease of four for both genders of the white racial group.

- Both genders of the white racial group decreased by 4.

Charts 29 and 30 display the data for net change for overall staff and staff without operators in 2019.



Source: Audit Services Division created chart based upon data from MCTS's Human Resources system.



Source: Audit Services Division created chart based upon data from MCTS's Human Resources system.

Promotions

There were a total of 42 promotions for non-operator positions during our review. Two groups, Asian and American Indian/Alaska Native, had no promotions. Black or African American employees were 40% of the promoted employees versus being 25% of the non-operator workforce. Females were 29% of all promotions versus being 23% of the non-operator workforce.

Eleven Operators were promoted.

We were provided promotional data from the Human Resources Department at MCTS for the period of January 1, 2018 to June 30, 2019. There were 42 promotions for non-operator positions that occurred at MCTS during the period of our review. There were 11 Operators who were promoted. The promoted employees were from four out of six racial groups. We found:

- 40% of the promotions were from the Black or African American racial group compared to 25% of the non-operator workforce.
- 7% of the promotions were from the Hispanic racial group compared to 8% of the non-operator workforce.
- 7% of the promotions were from the Two or more races racial group compared to 2% of the non-operator workforce.
- 45% of the promotions were from the white racial group compared to 61% of the non-operator workforce.
- Females were 29% of the promoted employees versus 23% of the non-operator workforce.

Females were 29% of the promoted employees versus 23% of the workforce.

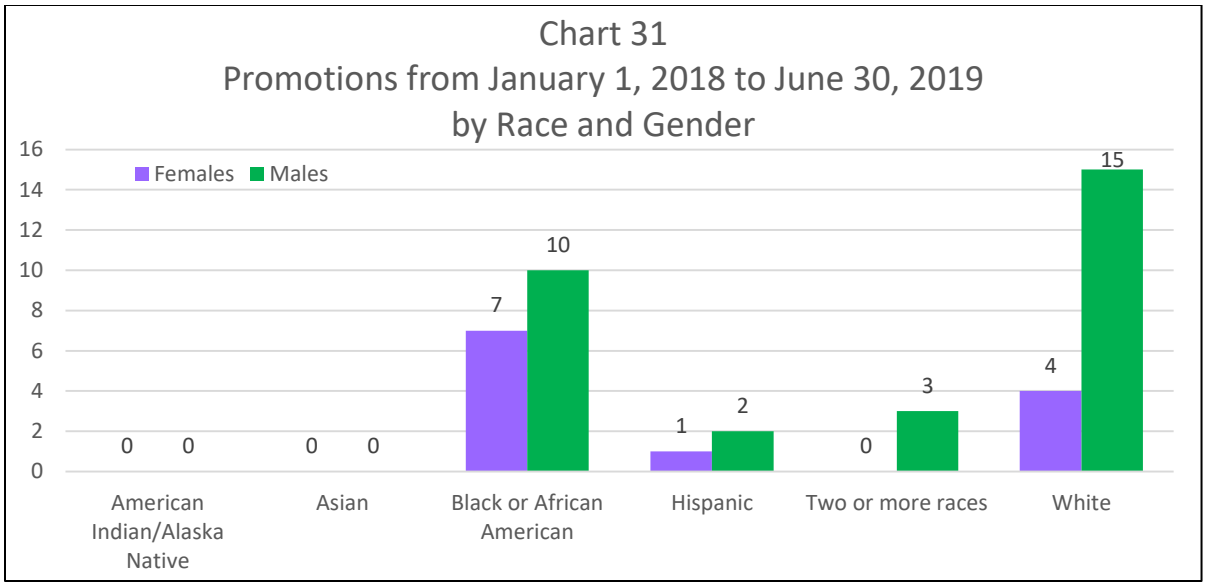
For females, Black or African American females had the highest number of promotions with seven.

We also analyzed the promotions by race and gender and found that both genders of the white racial group and Hispanic males were promoted at a rate lower than their share of the non-operator workforce. Two Hispanic males were promoted which was 5% of promotions and they are 6% of the non-operator workforce. Four white females were promoted which was 10% of promotions and they are 12% of the non-operator workforce. Fifteen white males were promoted which was 36% of promotions and they are 49% of the non-operator workforce.

Three groups were promoted a rate that was higher than their share of the non-operator workforce. Seven Black or African American females were promoted which was 17% of promotions and they are 8% of the non-operator workforce. Ten Black or African American males were promoted which was 24% of the promotions and they are 17% of the non-operator workforce. One Hispanic female was promoted which was 2% of promotions and they are 1% of the non-operator workforce.

Three employees from the Two or more races racial group were promoted. All were male employees. They comprised 7% of the promotions compared to 2% of the non-operator workforce.

Chart 31 displays the promotions by race and gender.



Source: Audit Services Division created chart based upon data from MCTS's Human Resources Director.

MCTS is required to establish and follow an Equal Employment Opportunity Plan per the U.S. Department of Transportation.

Since 1977, the U.S. Department of Transportation (DOT) has required recipients of transit funding to establish Equal Employment Opportunity (EEO) Programs and to comply with applicable laws and regulations. MCTS is required to comply. The Federal Transit Authority (FTA), a division of the DOT, issues circulars to inform recipients of the requirements. The EEO Circular explains FTA's EEO Program requirements, explains the complaint and oversight process and reflects changes in the laws, regulations, and guidance since the guidelines were originally issued in 1988.

Major items in the circular include:

FTA requires recipients to submit an updated plan every four years or as major changes occur.

- FTA requires recipients, to submit an updated EEO Program every four years or as major changes occur in the workforce or employment conditions, whichever comes first, covering all employment and personnel practices, including recruitment, hiring, promotions, separations, transfers, layoffs,

classification, compensation, training, benefits, and other terms and conditions of employment.

FTA requires each agency to state they will communicate the existence of its EEO policy and program to employees, applicants and potential applicants.

- FTA requires each agency to state they will communicate the existence of its EEO policy and program to employees, applicants, and potential applicants. The circular includes a variety of methods to fulfill this item including written communication, issuance of materials, including information in the employee manual, meeting with top management or employees, conducting periodic training for employees and managers, and conducting EEO training for all new supervisors or managers within 90 days of their appointment.

The current EEO Program expires December 31, 2024.

When we conducted our fieldwork, there was an existing EEO plan in place, however, subsequent to our fieldwork, MCTS issued a new EEO plan in March of 2020 that is in effect until 2024. We conducted a review of changes to the Recruitment and Selection Policy portion of the plan which is detailed in Section Four. We also conducted a review of the new plan and compared it to the requirement that we found within the FTA circular. We found some missing items and were informed by MCTS that they would be submitting a revised plan to the FTA to correct the missing items.

MCTS management indicated that there is no formal review or acceptance of its submitted plan other than its triennial review by the FTA which is projected to occur in summer of 2021. The most recent triennial review was issued in November of 2018. The Triennial Review focused on MCTS's compliance in 20 areas. MCTS was found to have 16 out of 20 areas with no deficiencies and no repeat deficiencies from the 2015 Triennial Review. Deficiencies were found in 4 areas: Technical Capacity Award Management related to reporting the progress of its projects to the FTA, Procurement related to a variety of areas, Americans with Disabilities Act –

Complementary Paratransit due to denial tracking deficiencies, and Section 5307 Program Requirements due to public participation requirements.

The FTA may select agencies for a Civil Rights Specialized review. The following factors contribute to the selection of a recipient for a Civil Rights Specialized Review:

- Risk factors identified by the FTA annual Recipient Oversight Assessment.
- FTA complaints (triggered either by the volume of complaints or the scope of a specific complaint, requiring an in-person investigation).
- EEO findings or recommendations on prior triennial, state management, or planning certification reviews that have not been sufficiently resolved or implemented, or repeat findings in any FTA review concerning EEO.
- An incomplete or insufficient EEO Program submitted by the recipient.
- Lawsuits, complaints, or investigations conducted by organizations other than FTA alleging the recipient is noncompliant with Equal Employment Opportunity statutes and regulations.
- Alleged noncompliance brought to the attention of FTA by other entities.

According to an interview with MCTS management, they have not been required to submit to a Civil Rights Specialized Review.

The FTA circular contains 14 requirements of the EEO Officer. We found two of the 14 requirements were not specifically identified in the MCTS job description.

The purpose of the Federal Transit Administration Circular (FTA C 4704.1A) is to reissue the guidance to all applicable FTA grantees for complying with the EEO provisions of Federal law including the responsibilities of the EEO officer. MCTS hired a Director of Diversity and Inclusion in October 2017, who serves as its EEO officer. We reviewed the job description for the Director

of Diversity and Inclusion and found that there were two requirements out of 14 in the FTA Circular that were not noted in the MCTS job description. They are:

- Designing, implementing and monitoring internal audit program to determine where progress has been made and where proactive action is needed.
- Auditing postings of the EEO policy statement to ensure compliance information is posted and up to date.

The FTA circular also contains a checklist for the officer to concur in the hiring process. We reviewed the checklist for concurrence and found no issues between the checklist and the job description.

In addition, the FTA Circular includes a sample concurrence checklist that is used to ensure concurrence with the hiring and promotion process. We did not find any deviation from the checklist in the Director of Diversity and Inclusion job description. The FTA defines compliance with concurring in the hiring and promotion process when the EEO Officer has reviewed employment documents to ensure the actions of the agency are not discriminatory.

The Director of Diversity and Inclusion is responsible for labor relations while the FTA circular is silent on any prohibition on that role, it does emphasize that no conflicts or appearance of conflicts appear.

The Director of Diversity and Inclusion in an interview noted that he has also been responsible for labor relations at the agency and that it has been a time consuming task at the agency with recent contract negotiations occurring with both unions at MCTS. There is a Director of Labor Relations that reports to the Director of Diversity and Inclusion. The FTA does require agencies and their senior managers to give the

EEO Officer support and assign sufficient staff to successfully carry out the EEO Program, as appropriate. The following language appears in the circular as it relates to the role of the EEO Officer.

> The designation of an agency's EEO Officer responsible for EEO Program management and oversight reflects the agency's EEO commitment. As such, FTA requires agencies to designate an executive as EEO Officer who will report to and is directly responsible to the agency's CEO/GM. Since managing the EEO Program requires a commitment of time and resources, FTA requires agencies and their senior managers to give the EEO Officer support and assign sufficient staff to successfully carry out the EEO Program, as appropriate…. Independence and impartiality are hallmarks of a strong EEO function; therefore, FTA requires agencies to ensure that no conflicts of position or conflicts of interest occur, or appear to occur, with respect to the EEO Officer's role. This means agencies may need to separate the EEO Officer from human resources (HR) official(s) and HR functions in order to maintain the integrity of the EEO investigative and decision-making process.

The FTA Circular also includes language regarding training and informing parties of its EEO program.

The FTA Circular requires agencies to communicate the existence of its EEO program and includes methods such as conducting periodic training for employees and managers and conducting EEO training for all new supervisors or managers within 90 days of their appointment. Based on interviews with executive staff at MCTS, MCTS does not currently offer EEO training for its newly hired supervisors or managers. During June and July of 2019 MCTS had four half-day training sessions for 34 management employees, with the YWCA Racial Justice Initiative to advance the cause of racial equity at MCTS. The Director of Diversity and Inclusion indicated in 2018 he presented MCTS's EEO

MCTS does not currently offer EEO training for its newly hired supervisors or managers.

program to the management staff. Harassment training is provided to all new Operators by the Director of Diversity and Inclusion.

MCTS has expanded its outreach efforts by attending job fairs and partnering with the technical colleges in Milwaukee and Waukesha. The mentoring program continues to be delayed while additional participation in the tuition reimbursement program should be encouraged.

MCTS attended 24 job fairs and outreach events in 2019.

According to interviews with Human Resources staff, MCTS has expanded its hiring outreach via job fairs, contact with veterans and schools and seeking out different communities such as attending the Hispanic Heritage Festival. MCTS indicated that they attended 24 job fairs and outreach activities in the community in 2019 as shown in Table 5. MCTS also works with the Milwaukee Area Technical College and Waukesha County Technical College to recruit mechanics. In addition, MCTS provided us three examples of job descriptions that MCTS indicated were revised by their Human Resources department with inclusive language.

Table 5
List of Outreach Activities in 2019

Job Center of Southeast SE Information Session	Employ Milwaukee Job Fair March 2019	Our Community, Our Solutions Resource Fair	MATC Transportation Job Fair
MATC Growing the Workforce Job Fair	Job Center of Southeast WI Walk in Interviews	Veteran's Job Fair Milwaukee	Employ Milwaukee Job Fair – May 2019
IT Career Fair	Juneteenth Day	MLK Library Job Fair	Goodwill Information Session
Hip Hop Job Fair hosted by Ald. Rainey	Amani Outdoor Summer Job Fair	Ross I.E.S. Autumn Career Fair	NEW9th Job Fair – Ald. Lewis
Midtown Job & Resource Fair – Ald. Johnson	Ross I.E.S. Job Fair at the Annual Milwaukee Fatherhood Summit	Garden Homes & Job Resource Fair – Common Council Pres. Hamilton	Reentry Employer Networking Expo of SE Wisconsin
Sojourner Family Peace Center	ROSS Harvest Fest Career Fair	Outdoor Summer Job Fair hosted by Ald. Coggs	MAXIMUS Job Fair

Source: Audit created table based upon data received from the Human Resources Director at MCTS.

We conducted nine interviews with management at MCTS including five with direct hiring managers as a part of our fieldwork. We found:

- Employees interviewed noted changes in diversity efforts and that things at MCTS have gotten better.
- Employees stated that there appears to be more transparency at MCTS with managers and hiring for diversity.
- The hiring process is more formal than in the past with changes to the Recruitment and Selection policy formalizing and organizing the hiring process.
- Of the hiring managers we interviewed all five were aware of the hiring policies.
- Staff acknowledged a continued lack of diversity in upper management.

Mentoring Program

A recommendation of our prior audit was the establishment of a mentoring program at MCTS. MCTS indicated as of the May 2019 status report on the prior audit that the mentoring program has been formally established. In an interview with MCTS management they indicated that the current pandemic has resulted in a delay in implementation as they pivot to an online version of the program as staff is teleworking. We were informed during our fieldwork in October and November of 2019 that due to ongoing union negotiations the start of the Mentoring Program was postponed.

Tuition Reimbursement

MCTS provided us with a copy of its tuition reimbursement policy, a sample of the application form and a listing of the participants from January 1, 2018 to June 30, 2019. There were eight participants in total during the 18 month period. Table 6 shows the racial and gender breakdown of the participants.

Table 6
Tuition Reimbursement Program Participants by Race and Gender for January 1, 2018 to June 30, 2019

Race	Gender	Number of Participants
Asian	Female	1
Black or African American	Female	5
Black or African American	Male	2

Source: Audit created table based upon data provided by the Human Resources Director at MCTS.

Section 4: A detailed review of selected personnel hiring files from January 1, 2018 to June 30, 2019 found some improvements in results but additional work is needed at MCTS.

MCTS's Equal Employment Program has a Recruitment and Selection policy outlining steps to be taken when hiring for a position. The policy was recently revised.

MCTS provided us with a copy of its EEO plan which included Policy 1.302 Recruitment and Selection. The purpose of the policy is to "provide guidelines for recruiting and selecting employees for available positions at MCTS. This policy is not intended to override the various collective bargaining agreements currently in place." During our multiple interviews with staff it was repeatedly stated that hiring managers had copies of the policy or were aware of it and followed it while filling positions.

MCTS revised its Recruitment and Selection Policy in December of 2019.

The policy was revised in December 2019 which was after the date of the files we reviewed. We conducted an analysis of what changed in the policy that was relevant to the scope of our audit. Many of the changes were clarifications of the prior policy. Some major changes did occur. While the prior policy stated that the Director of Diversity and Inclusion "will" participate in the scoping meetings, the new policy was changed to say "may." The responsibility for the requirement that a postmortem review of the process occurs to identify any bias has now been assigned to the Director of Diversity and Inclusion. Interview panels were not discussed in the prior policy but language was added to establish

policy and procedures for interviews to be used during the hiring process.

We reviewed the former policy, which aligned with the files we selected, to identify the steps in the process for filling a position at MCTS. Based upon that review we established a list of questions within the scope of our audit that should be answered by a review of MCTS hiring files. The process for hiring at MCTS begins with a scoping meeting held by the Human Resources department after a department has initiated the process to fill a non-represented position.

We conducted a review of 12 requisition files from hiring that occurred from January 1, 2018 to June 30, 2019.

Starting after our prior audit which was released in 2017, MCTS began creating a requisition file for each non-represented position that is filled. MCTS had a total of 36 requisition files by job title. We conducted a review of 12 requisition files from hiring that occurred from January 1, 2018 to June 30, 2019. We obtained the files from MCTS's Human Resources Department. We sought to answer questions derived from the Recruitment and Selection Policy and we reviewed the files for the demographics of the following items:

- scoping meeting participants
- list of applicants
- applicants selected for an interview
- the interview panels
- successful candidates

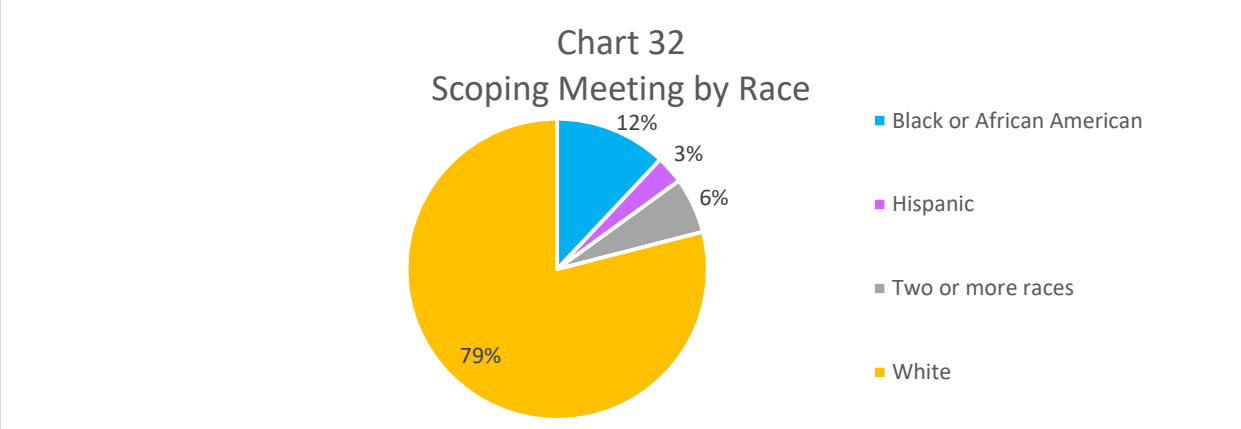
We found attendance at scoping meetings was 79% from the white racial group although this is partially driven by Human Resources staff attendance at the meetings.

We found that the total attendance at scoping meetings was a count of 34 with some individuals attending more than once. The number of attendees ranged from two

to four for each position with three being the most frequent number of attendees. The total racial breakdown is shown in Chart 32. Five out of 12 meetings were staffed by members of the white racial group without any other group represented.

Overall 79% of the participants at the scoping meeting were from the white racial group versus 61% of non-operator staff from this racial group. It should be noted that one attendee from the Human Resources Department was at 11 out of 12 scoping meetings and is from the white racial group. Of the 12 files we reviewed, the Director of Diversity and Inclusion was noted as attending two of the 12 scoping meetings.

The Black or African American racial group was 12% of scoping meeting participants versus being 25% of the non-operator workforce. Hispanics were 3% of participants versus 8% of the non-operator workforce and two or more races were 6% of participants versus 2% of the non-operator workforce. There were no members of the following races at the scoping meetings: American Indian/Alaska Native and Asian.



Source: Audit Services Division created chart based upon data from MCTS's Requisition Files.

Of the total applicants, 33% did not reveal demographics. Of those who did, applicants from both the Hispanic and Two or more racial groups applied at a lower percentage than their workforce percentage.

Total applicants during the period of our review were 430 individuals. Of those, 143 did not disclose which racial group they were from and 141 did not disclose their gender. We based our analysis on the pool of candidates who did identify race and gender. The total racial breakdown of the applicants is shown in Chart 33.

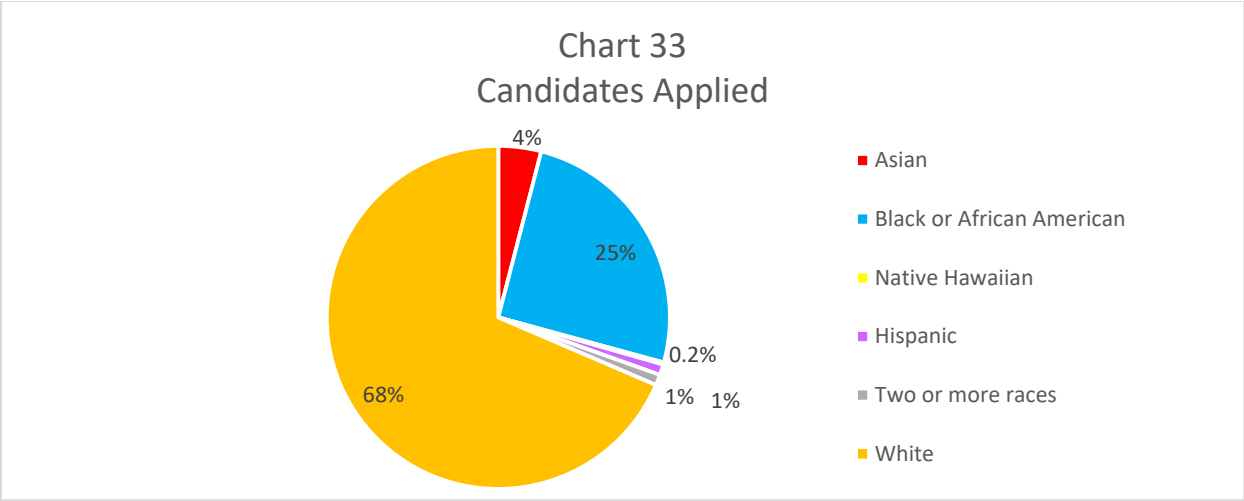
The applicant pool was as follows:

68% of the applicants were from the white racial group versus 61% of non-operator staff.

- 68% of the applicants were from the white racial group versus 61% of non-operator staff.
- Black or African American applicants matched the racial group's workforce percentage at 25%.
- 1% of the applicants were from the Hispanic racial group versus 8% of non-operator staff.
- 4% of the applicants were from the Asian racial group versus 3% of non-operator staff.

1% of applicants were from the Hispanic racial groups versus 8% of non-operator staff.

- 1% of applicants were from the Two or more races racial group versus 2% of the workforce.
- One applicant was from the Native Hawaiian racial group and there were no applicants from the American Indian/Alaska Native group.



Source: Audit Services Division created chart based upon data from MCTS's Requisition Files.

Candidates selected for interviews were within 4% or less of the percentage rate at which they applied by racial group.

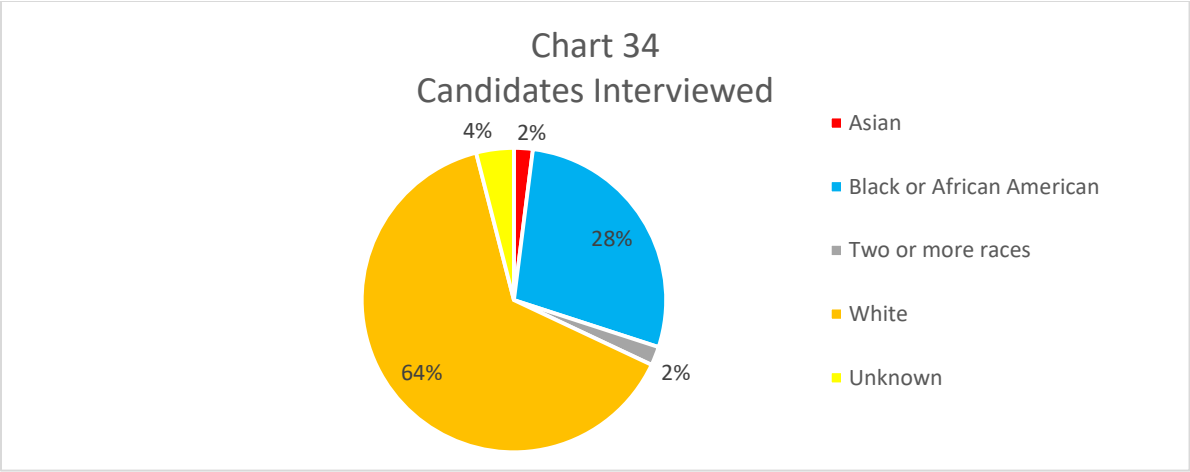
The applicants who were selected for interviews totaled 50 including one female who did not disclose her race and one applicant who did not disclose race or gender. The total racial breakdown of the applicants selected for interviews is shown in Chart 34.

The applicant interview pool was as follows:

28% of interviewees were from the Black or African American racial group versus the racial group's workforce percentage of 25%.

No applicants from the Hispanic racial group were selected for interviews.

- 64% of the interviewees were from the white racial group versus 61% of the non-operator workforce and 68% of applicants.
- 28% of the interviewees were Black or African American versus the racial group's non-operator workforce and applicant percentage of 25%.
- 2% of interviewees were from the Asian racial group versus 3% of the non-operator workforce and 4% of applicants.
- No applicants from the Hispanic and the Native Hawaiian racial group were selected for interviews and 1% of applicants were from each of these racial groups.
- 4% of interviewees' racial group was unknown.



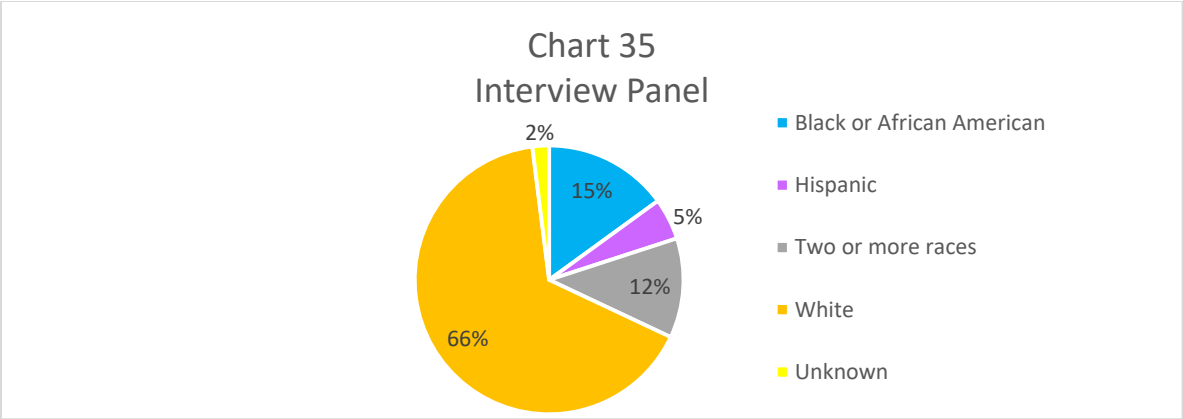
Source: Audit Services Division created chart based upon data from MCTS's Requisition Files.

The make-up of the interview panels was not as diverse as the non-operator workforce.

The interview panels were as follows:

- 66% of the participants were from the white racial group versus 61% of non-operator staff.
- 15% of the participants were from the Black or African American racial group versus 25% of non-operator staff.
- 5% of the participants were from the Hispanic racial group versus 8% of non-operator staff.
- 12% of participants were from the Two or more races racial group versus 2% of the workforce.
- 2% of the participants had an unknown racial group and there were no participants from the American Indian/Alaska Native or the Asian racial groups.

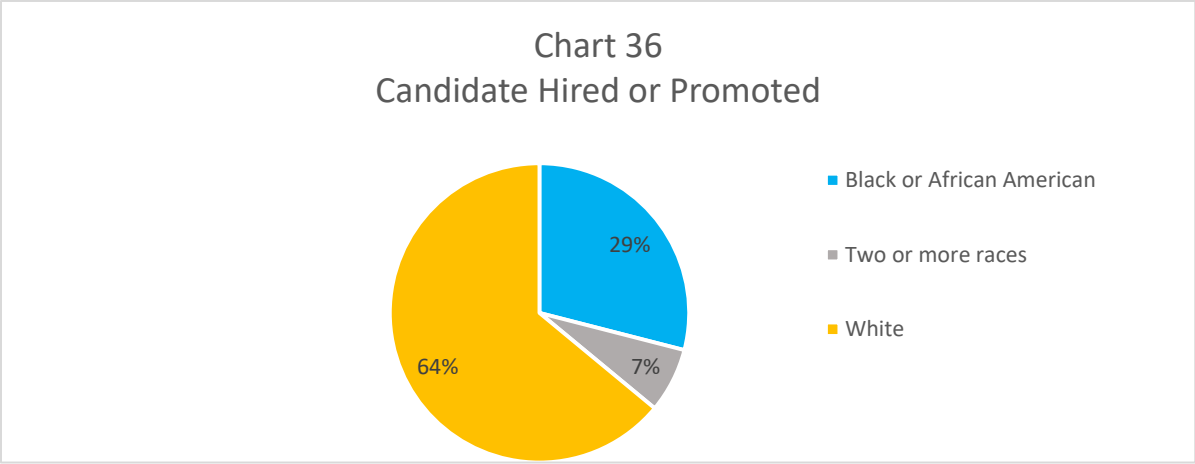
Chart 35 displays the interview panel participants by racial group.



Source: Audit Services Division created chart based upon data from MCTS's Requisition Files.

Of the 14 hires that occurred, employees were from only three racial groups, Black or African American, Two or more races and white.

Of the 12 requisition files we reviewed, nine of the hires were from the white racial group, four were from the Black or African American racial group and one was from the Two or more races racial group. One file resulted in no hiring and three files had two positions filled. Chart 36 displays the hiring data by race.



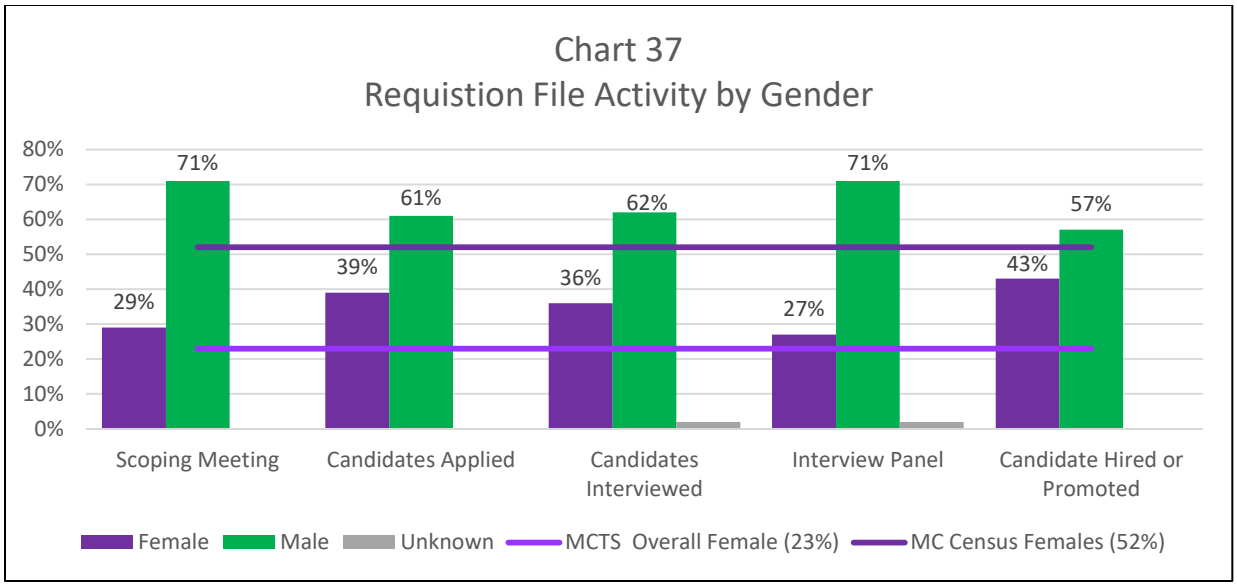
Source: Audit Services Division created chart based upon data from MCTS's Requisition Files.

We reviewed the requisition files for participation by gender and found that all areas exceeded MCTS's female non-operator workforce percentage of 23%. Two categories, Scoping Meetings and Interview Panels, did not exceed 30% female participation.

As a part of our review of the 12 requisition files from hiring that occurred from January 1, 2018 to June 30, 2019 we also looked at the steps by gender participation. Non-operator females are 23% of the workforce at MCTS. When we reviewed the requisition files to see participation by gender we found:

- All categories exceeded 23% in terms of participation from females.
- 39% of applicants were females versus 52% of the County's population.
- 36% of candidates selected for interviews were females.
- 43% of candidates hired or promoted were female.
- The two categories that look at MCTS participation rather than applicants were the lowest steps for female participation with the scoping meeting at 29% female and the interview panel at 27% female.

Chart 37 displays the requisition file steps and participation by gender.



Source: Audit Services Division created chart based upon data from MCTS's Requisition Files.

Requisition File compliance with policy found that the required review of potential barriers and biases did not occur within the 12 files we reviewed.

A secondary aspect of our review was to answer the following questions based upon requirements of MCTS's Recruitment and Selection policy:

- Is the job description up to date and was it updated during the hiring process?
- Did they create a hiring matrix?
- Did they identify the source for recruiting?
- Did they identify scoring methods?
- Did the Director of Diversity and Inclusion participate in the scoping meetings as required by the policy? Was there evidence of concurrence on hiring?
- Was there a Conditional Offer Letter in the file?
- After the offer was made, did they review the process for any areas of bias?

- After the offer was made, did they consider opportunities for internal unsuccessful candidates for mentoring or further education?

We found that all files were in full compliance with the policy in regards to the following items: updating the job description, establishing a hiring matrix and identifying a source of recruitment when hiring was not internal only.

Eleven out of twelve files indicated a scoring method was used. The only position that did not have a scoring method was for the Senior System Administrator position.

Partial compliance with the policy was found with eight out of twelve files containing a copy of the conditional offer letter. In five out of twelve hirings, the Director of Diversity and Inclusion was noted as having participated in the scoping meeting or concurring on the hiring.

We found no evidence within the 12 files we reviewed that the following required reviews occurred: potential artificial barriers within job descriptions and areas of bias in the process.

We found no evidence within the 12 files we reviewed that the following required actions occurred:

- review of potential artificial barriers within job descriptions.
- review of the process to identify possible areas of bias and assessment team identifying unsuccessful internal candidates for consideration for opportunities for mentoring or additional education.

File Maintenance

We were provided a checklist of items to be stored in the personnel files at MCTS. We found inconsistent following of the checklist. For example, every file should have a conditional offer letter to the employee. Of the 48 files we reviewed, 37 did not have a copy of the letter. There was also confidential information that should not be found in personnel files. Managers outside of Human

Resources are able to request to review these files which may result in access to confidential information. We found 37 out of 48 files had copies of notes from interviews that should not be in the file. We also found that the checklist did not always reflect what was contained in the file.

In an interview with the Human Resources Department of MCTS they indicated that as of August 2019 they began to follow the Management Association's (MRA) resource guide. MRA is a nonprofit employer association founded in 1901 that serves more than 4,000 employers and provides tool kits and resources on Human Resource related topics. The resource guide used by MCTS identifies what information employers should keep in personnel files. The change in policy was implemented after we conducted our file review.

Section 5: Conclusions and Recommendations.

We found the following racial groups to be underrepresented when comparing the percentage of non-operator staff to Census estimates: the Hispanic racial group, Asian racial group, Two or more races racial group. In addition, females were also underrepresented when compared to Census data for the non-operator workforce at MCTS. In addition, Hispanics and females of all racial groups were found to be underrepresented in multiple job classifications.

Our analysis of salary data found that Black or African American employees are 76% of the lowest salary tier and 28% of the top tier while white employees are 14% of the bottom tier and 62% of the top tier. Female employees are 57% of the lowest tier and 18% of the top tier. Females of all racial groups, except for the white and Asian racial groups, were under the average salary for MCTS in 2019.

Our review of the hiring process and data from hiring, promotions and separations showed progress in some areas with the Hispanic racial group being 26% of hires versus 8% of staff. For non-operators, the net change between new hires and separations was a net increase of seven employees of color versus a decrease of eight for white employees. The white racial group was 45% of the promotions compared to being 61% of the non-operator workforce. Females were 29% of all promotions. However, females comprised only 14% of the new hires for non-operators in 2019. Of the five females who were hired all were from the white racial group. For non-operators, the net change between new

hires and separations was a net decrease of seven female employees versus an increase of six for male employees.

Therefore, we recommend MCTS:

1. *Develop and document new strategies for recruitment and hiring that are focused on encouraging additional female applicants, especially females of color. Work with hiring managers to target recruitment of more female applicants. Establish a system to monitor effectiveness.*

2. *MCTS should provide annual training to hiring managers within the job classifications that are currently underrepresented on how to diversify its staff. Include additional training on its EEO plan.*

3. *Immediately implement the mentoring program at the agency and increase efforts for participation by increasing awareness of the program and its benefits at the agency. Create a plan to share success stories with staff.*

We conducted a review of 12 requisition hiring files and found that the participation percentage from the white racial group and males closely mirrored the non-operator workforce levels but was not reflective of the Census data percentage. We reviewed a report titled, “Best Practices: Recruiting & Retaining Faculty & Staff of Color,” published by Western Washington University which states that the interview process should be examined to have diversity on its hiring panel. The report concludes, the search committee needs diversity within to “broaden the current paradigm and consider minority individuals outside the specific department or unit of the position being searched. The perspective the diverse search member can bring can be as valuable as those within the department/unit who are the ‘subject matter experts.”

Table 7 shows the participation from the white racial group and males at MCTS during the various stages of the hiring process.

Table 7
Participation in the Requisition Files by the White Racial Groups and Males

Hiring Step	White Racial Group Participation	Male Gender Participation
Scoping Meeting	79%	71%
Applicants	68%	61%
Applicants Interviewed	64%	62%
Interview Panel	66%	71%
Candidates Hired	64%	57%

Source: Audit created table based upon review of MCTS's requisition files.

Therefore, we recommend MCTS:

4. *Update the Recruitment and Selection Policy to identify goals for the diversity of various steps within the hiring process such as interview panels and scoping meetings. Implement a system to review adherence to the diversity goals.*

We also found that the required review of the process for biases, the job description for barriers and providing opportunities for unsuccessful candidates did not occur within any of the 12 files we reviewed. Therefore, we recommend MCTS:

5. *Immediately implement the review of barriers to employment with job descriptions and the review of the hiring process to identify possible areas of bias and identifying unsuccessful internal candidates as required under the Selection and Recruitment Policy. Implement an internal control system to document compliance with the policy.*

Milwaukee County is a member of the Government Alliance on Race and Equity which periodically issues reports and briefs to provide additional information and

guidance to governmental entities on race and equity, therefore, we recommend MCTS:

6. *Become familiar with the GARE toolkit recommendations and develop an appropriate toolkit for implementation at MCTS.*

Exhibit 1

Audit Scope

In June of 2017, at the request of the Milwaukee County Board of Supervisors in a County Board Resolution File No. 15-227, the Audit Services Division issued an audit titled "Improvements Needed to Strengthen Milwaukee County Transit System's (MCTS) Commitment to Workforce Diversity." The overall objective was to conduct an operational and procedural audit on the operations and management of MCTS as it related to hiring, promotions, demotions, and turnover practices including qualifications, gender, age, county and non-county experiences, tenure, and diversity with special attention to minority and gender hiring practices. The detailed audit identified twenty-five (25) recommendations. Since presenting the audit to the County Board of Supervisors in 2017, there have been four (4) written follow-ups including a meeting with MCTS management and Audit Services Division staff in October of 2018 to identify the actions taken by MCTS to address the recommendations. As of August 2019, two (2) audit recommendations remain unresolved. Therefore, we conducted an MCTS Diversity Mini Audit to evaluate the current structure put in place by MCTS Management through new policies and procedures and the impact on new and existing staff by race and gender.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

We limited our review to the areas specified below. In our review after the release of the 2017 audit, we:

- Reviewed relevant regulations, policies, administrative procedures, budgets, and resolutions including federal, state and county statutes, laws, and ordinances relating to affirmative action and workforce diversity concepts including the Federal Transit Administration (FTA) Circular 4704.1A.

- Evaluated new and revised policies and procedures for mentoring, career path counseling, tuition reimbursement, and internal and external complaints process designed to improve employment practices at MCTS.

- Interviewed MCTS management staff and hiring managers to obtain relevant information on the implementation of various new and revised policies and procedures, race/ethnicity and gender data collection and implementation, employee recruitment efforts, and hiring practices.

- Analyzed workforce data using U.S. Census Bureau Relevant Labor Market/Equal Employment Opportunity (EEO) reports, and reports from MTS' Internal Monitoring & Reporting System used to report, track, assess, and measure the demographics of hires, promotions, and separations. Pivot Tables were created based on the year-end 2019 MCTS Census data reports and charts were created in Excel.

- Evaluated MCTS' hiring practices from sample reviews of scoping meetings and requisition files for non-represented positions, created to track the recruitment and selection process for new hires and promotions.

- Reviewed personnel files for completeness.

- Reviewed Racial Equity reports by the Government Alliance on Race and Equity (GARE) to identify best practices and data on racial equity and advance opportunities as it relates to the practice of workforce equity for all.

- Conducted a walkthrough of the new Applicant Tracking System (ATS) and obtained copies of statistical information by applicant race and gender tracked by the system.

- Reviewed the report from Segal Waters regarding compensation analysis.

- Evaluated MTS average salaries.

- Compared job descriptions for MTS Director of Diversity and Inclusion and Director of Human Resources to FTA circulars to identify any conflicts of interest that should be avoided.

Exhibit 2

Milwaukee County Transit System
1942 North 17th Street • Milwaukee, Wisconsin • 53205-1697
(414) 344-4550 • RideMCTS.com

DATE: August 3, 2020

TO: Jennifer L. Folliard, Director of Audits

FROM: Dan Boehm, President and Managing Director, MCTS

SUBJECT: Response to the August 2020 Audit – Revisiting MCTS Workforce Diversity: While the Road to Racial and Gender Equity Remains, Progress has Been Made.

On behalf of MCTS, I would like to thank the entire Milwaukee County Audit team for their diligence. The work that you do helps us to improve. Starting with the June 2017 audit report on MCTS Workforce Diversity, your efforts informed our approach to diversity and directly contributed to our successes.

We are committed to racial equity and will continue to use formal and transparent hiring practices to get there. As your report details, our workforce has grown more diverse as we continue to hire and promote people of color and women at disproportionately high rates. When I read captions and quotes from your report – like the following – I know that we are making progress and moving the needle on racial equity.

> ***"Employees interviewed noted changes in diversity efforts and that things at MCTS have gotten better."*** And ***"Employees stated that there appears to be more transparency at MCTS with managers and hiring for diversity."***
>
> ***"We found the staff to be more diverse in 2019 compared to the prior audit issued in 2017."***
>
> For Non-operator positions/promotions: ***"Black or African American employees were 40% of the promoted employees versus being 25% of the workforce. Females were 29% of all promotions versus being 23% of the workforce."***

While we are proud of our progress, we know that the road to racial and gender equity is long, as the report title suggests. Our workforce continues to have disparities relative to the Milwaukee County population, and our management staff can still benefit from more diversity. And while a maintenance workforce that hires from a pool that is overwhelmingly male can be frustrating, we accept the challenge to employ more women, especially in professional and supervisory positions.

We know that Milwaukee is filled with talented people of color but recognize there can be stiff competition for the best and brightest. While we cannot always compete with other employers, we remain especially excited about the potential for continued diversification of the organization by promoting from within. MCTS Bus Operators are a talented group who come from all walks of life, who become experts in the business of moving Milwaukee from the ground up. Our Operators are a proven source of future leaders at MCTS. We will continue to extend career building opportunities to those that are willing to share their talents, perspectives and ideas while taking on greater responsibilities.

In closing, MCTS remains committed to achieving racial equity and making Milwaukee the healthiest county in Wisconsin. The Audit team's recommendations will help further focus and enhance our efforts in this area. The recommendations are in line with our recent activities, our near-term plans, and our organizational mission, vision and values. We look forward to reporting on our continued work to both the Audit team, and the Audit Committee of the County Board of Supervisors.

Excellence
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