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Equal Employment Opportunity Policy and Program

Contact: Sam Short
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Date and effective durations of EEOP: July 1, 2026, through June 30, 2029

Policy Statement:

In accordance with Mountain Line Personnel Policies and Procedures, as approved by the Board of Directors, Mountain Line is an equal opportunity employer committed to applying the principles of state and federal anti-discrimination laws to provide equal opportunity to all persons employed or seeking employment, without regard to age (40 and over), race, sex (including pregnancy and breastfeeding), color, religion, national origin, disability, military status, genetic information (including results of genetic testing), status as a registered medical marijuana cardholder, sexual orientation, gender identity or expression, or any other status protected by applicable federal, state, or local law. Mountain Line is committed to maintaining a workplace free of harassment and intimidation.

As part of its commitment to diversity in our workplace, Mountain Line reviews employment demographics bi-annually to assess the utilization level of protected groups and ensure fair consideration in all aspects of employment including recruitment, compensation, selection, training, promotion, benefits, and layoff.

Mountain Line has taken steps to enlarge the pool of qualified candidates from which employment decisions are made. These steps include searching for qualified minority and women candidates and ensuring that they are considered for available positions. In addition, Mountain Line will strive to identify and remove barriers or practices that may be discriminatory with intent or effect. The goal of the Mountain Line's Equal Employment Opportunity Plan is to eliminate artificial barriers to employment and promotion, and to achieve a work force, in each division and throughout all levels of employment, which reflects Mountain Line's external labor force. Mountain Line asks its contractors to comply with equal employment opportunity laws and guidelines in employment practices.

As Governing Body of Mountain Line, we hereby confirm that such policy exists and that the statements made above are part of that policy.

Josh Maher, Chair of Mountain Line Board of Directors
Adopted: June 17, 2015
Updated: May 21, 2026

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Section I: EQUAL EMPLOYMENT OPPORTUNITY STATEMENT

Mountain Line is dedicated to the principles of equal employment opportunity. We prohibit unlawful discrimination against applicants or employees on the basis of age 40 and over, race, sex (including pregnancy and breastfeeding), color, religion, national origin, disability, military status, genetic information (including results of genetic testing), status as a registered medical marijuana cardholder, sexual orientation, gender identity and expression, or any other status protected by applicable federal, state, or local law.

Decisions on employment are based solely upon an individual's qualifications for the position being filled. Promotion decisions are made only on an individual's qualifications as related to the requirements of the position for which the person is being considered. Personnel actions such as compensation, promotions, disciplinary actions, benefits, transfers, layoffs, return from layoffs, and training are administered without regard to race, color, religion, national origin, sex (including gender identity, sexual orientation, and pregnancy), age, genetic information, disability, veteran status or other protected class or disability except in the case of a bona-fide occupational qualification where applicable.

Mountain Line makes reasonable accommodations for employees' religious observations and/or will provide accommodations unless doing so would result in an undue hardship.

Mountain Line operates within the principles of equal employment opportunity guidelines as set forth in applicable federal, state, and local laws and regulations. Mountain Line will cooperate fully with all organizations and commissions organized to promote fair practices and equal employment opportunity.

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

Any employees with questions or concerns or complaints about any type of discrimination in the workplace are encouraged to bring these issues to the attention of their immediate supervisor, human resources, or the Human Resources Manager (EEO Officer). Additionally, issues pertaining to the Americans with Disabilities Act should be directed to Mountain Line's ADA Coordinator (Human Resources Manager). Employees can raise concerns and make reports without fear of reprisal or retaliation. Anyone found to be engaging in any type of unlawful discrimination or retaliation will be subject to disciplinary action, up to and including termination of employment.

Sam Short

Sam Short, EEO Officer

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Section II: DISSEMINATION OF PROGRAM

This section describes the communication and distribution process used by Mountain Line regarding its Equal Employment Opportunity (EEO) policy. Mountain Line is committed to making every reasonable effort to ensure that all current and prospective Mountain Line employees are aware of and understand Mountain Line's EEO policy and the procedures used to implement the plan. To achieve these aims, Mountain Line does the following:

- 1 Mountain Line's policy of non-discrimination and position as an "equal employment opportunity employer" is stated on each Mountain Line job announcement and is included in the newspaper ad listing for job vacancies. Additionally, Mountain Line policies prohibit discrimination.
- 2 The EEO policy and program includes a Diversity Management Plan. The Plan is available to review for each new employee and is also posted on the employee websites as well as Mountain Line's recruitment page on the web. The plan identifies workforce analysis, training, and recruitment/outreach as well as responsibly parties.
- 3 Section 1 of Mountain Line's Personnel Policy Manual includes policies on Equal Employment Opportunity (EEO) and Unlawful Harassment, a copy of which is available to each new employee and is also posted on the employee website as well as Mountain Line's recruitment page on the web. Mountain Line prohibits workplace harassment and retaliation against people who report alleged incidents of discrimination.
- 4 Each employee has access to a copy of the Personnel Policy Manual, and training regarding the EEO program, as part of New Employee Orientation.
- 5 Appointed officials, managers, and supervisors are charged with assuring that all employees in their organizations are aware of Mountain Line's Equal Employment Opportunity Policy and Programs.
- 6 Along with posting of EEO policy statement and program, pertinent state and federal posters concerning equal opportunity are displayed for applicant and employee information in Mountain Line facilities and public spaces.
- 7 Employees pictured in informational brochures will reflect the diversity of our employee population.
- 8 A copy of Mountain Line's EEO plan is available in the Human Resources Manager's office for employee and citizen review, along with copies of recent reports concerning the makeup of workforce analysis and availability analysis as well as annual EEO reports.
- 9 Elected and appointed officials are responsible for working with the Administrative Services staff to ensure the effectiveness of the EEO Program.
- 10 To the extent required by law. Procurements, purchase orders, leases, and contracts entered by Mountain Line shall incorporate the equal employment clause.





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- 11 To reach a diverse group of candidates, notice of employment opportunities is sent to various media outlets, including minority placement agencies, professional associations, and publications directed toward minorities.
- 12 Mountain Line periodically, but not less than annually, updates its commitment to the plan with managers, supervisors and employees.

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SECTION III: DESIGNATION OF PERSONNEL RESPONSIBILITY

Successfully creating and maintaining a diverse workforce requires the commitment and active participation of all parties involved. At Mountain Line, the diversity management effort is a top-down process, with responsibility apportioned commensurate to the authority and resources available to each person or group. The following paragraphs present a general overview of the tasks assigned to each level of accountability.

CEO and General Manager

The CEO and General Manager are responsible to monitor the results of the annual workforce analysis and other reports and ensures that information regarding Mountain Line's diversity management program is presented to the Board of Directors in a group setting on an annual basis. The CEO and General Manager take a leadership role in helping to identify any areas of concern and in encouraging responsible managers to undertake voluntary actions to improve workplace diversity.

The CEO and General Manager have appointed the Human Resources Manager as the EEO Officer and has delegated the responsibility for implementing and overseeing these policies accordingly. If there is a conflict of interest, staff can go to CEO or other HR staff.

Human Resources Manager/EEO Officer

As the appointed staff member most closely involved in auditing recruitment activity, the Human Resources Manager is responsible for ensuring that the overall process is as open, impartial, and inclusive as possible. This requires re-examination from time to time of the techniques used to publicize job openings and screen applicants. It is Mountain Line's goal to "cast a wide net" by among other things sending recruitment notices to a broad range of interested parties, including groups that may traditionally have been under-utilized. In addition, Human Resources Division staff maintain a presence at job fairs and community gatherings where there is an opportunity to inform the public about employment opportunities. To that end, effort is directed to engage in recruitment activities that transcend cultural, social, economic, and geographical barriers and reach the broadest possible audience.

The Human Resources Manager is also directed at making certain that the skills, experience, and educational background used as qualifiers for each job are consistent with the actual type and level of work being done. It is necessary to audit jobs and reassess minimum requirements on an ongoing basis, especially in areas where responsibilities have been reassigned and/or reorganization has taken place. While properly derived minimum qualifications will guarantee that candidates for employment possess the requisite skills to do the job, ill-conceived requirements may unnecessarily limit the applicant pool. Given the dynamic nature of today's workplace, minimum





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qualifications should be reconsidered from time to time.

Screening instruments, such as tests and interview questions, should also be scrutinized for unintended bias. Even when there is no evidence that a test illegally discriminates against a protected group, it may be inappropriate for the job under consideration. Screening instruments are only of value when they truly select for the competencies being sought. To be appropriate, screening instruments must have a business reason.

Aside from overseeing the recruitment and screening activities, the Human Resources Manager is tasked with preparing the workforce analysis data upon which the Diversity Management Plan depends. To accomplish this task, a wide range of information about the Mountain Line workforce is gathered throughout the year and twice annually tallied. This data provides a comprehensive look at the present workforce as well as the applicant pool. It allows interested parties to evaluate how well the diversity effort is doing, and it may provide guidance for future activities.

Managers and Others

Every manager and supervisor is committed to recruiting and retaining the best available employees, and to providing the highest level of customer service. There is abundant evidence that these goals are best accomplished by a diverse workforce. Managers and supervisors are responsible for utilizing the information from the workforce analysis to evaluate their own progress, and to make certain that the internal procedures used to select new employees are consistent with the diversity plan. They are expected to work cooperatively with the CEO and General Manager and Human Resources Division to identify and reach all known potential applicants and to ensure that employment decisions are made fairly and impartially.

Aside from hiring, promoting, and retaining a diverse group of employees, the diversity effort extends to providing Mountain Line services to a client community that includes people from a range of cultural experiences. Providing services effectively and efficiently to this community mandates the capability of communicating in several languages, and in ways that recognize the frame of reference of the end user. These needs must be considered in the preparation of recruiting materials and the selection of new employees. Moreover, managers and supervisors must consider changes in the cultural, social, or economic makeup of their client communities. Perhaps most importantly, public sector managers must recognize that managing diversity is a process, not an end. The focus of the diversity effort is not on creating a workforce that exactly mirrors the demographic makeup of the community so much as on creating an environment where everyone is welcome.

Mountain Line management has a strong record of recruiting, hiring, and rewarding a diverse workforce. The quality of work done by employees demonstrates that this is the most effective way to meet the needs of our client community. No one can predict with

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accuracy what challenges Mountain Line will face in the coming years, but it is certain that the best way to prepare for those challenges is by building on and expanding the employment practices that have brought success in the past. This will ensure the effectiveness and success of Mountain Line in the future. It may be truly said that our diversity is our strength.

Mountain Line evaluates the performance of managers, supervisors, and others based on the success of the EEO program in the same manner that the agency evaluates their performance in other agency programs.

Mountain Line Employees

In the final analysis, no single person or group can create a diverse organization; nor can a set of procedures or rules guarantee an inclusive workplace. To succeed, diversity must be an integral component of the organizational culture, embraced by employees at all levels. Mountain Line employees, at all levels, are expected to treat all people encountered within the workplace with dignity, respect, and consideration. This expectation is more than a management policy; it is a fundamental value, essential to Mountain Line's overall success.

Responsibility For Implementation

Mountain Line has structured levels of EEO responsibility. Outlined below is a summary of involvement of the CEO and General Manager, Human Resources Manager, and other staff in EEO activities.

The CEO and General Manager has overall responsibility for Mountain Line's EEO efforts and policies. Responsibility for implementing these policies has been delegated by the CEO to the Human Resources Manager, managers, and supervisors. Other functional groups sharing in this responsibility are Mountain Line's consultants and contractors.

The specific areas of responsibility are as follows:

- 1 The Human Resources Manager assisted by the HR Specialist, HR Technician, Management Services Director, and administrative staff implements and reviews a reporting system to evaluate the effectiveness of the EEO effort.
- 2 The Human Resources Manager assisted by the HR Specialist, HR Technician, Management Services Director, and administrative staff, works to identify possible problem areas on an ongoing basis. When an area of concern is identified, the Human Resources Manager brings the matter to the attention of the CEO and General Manager, who contacts the appropriate manager or supervisor.
- 3 Managers and supervisors work closely with the Human Resources Manager to develop plans of action and correct identified problem areas.
- 4 Working as a team the Human Resources Manager, the CEO and General

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- Manager, and a representative from Mountain Line's General Counsel review the results of the EEO program, monitoring the effectiveness of any corrective actions taken and evaluating overall progress.
- 5 With guidance from legal, the Human Resources Manager receives, investigates, and assists managers in the resolution of internal and external discrimination complaints/charges. Within this context, "internal" refers to issues involving Mountain Line employees; "external" refers to those involving non-employees who interact with Mountain Line. The Human Resources Manager manages the EEOC / NHRC Charge Investigation Process and the Division of Labor – OFCCP AAP Desk and Onsite Compliance Review Process.
 - 6 Staff members are encouraged to make themselves available to all citizens, including community action groups.
 - 7 Managers and supervisors may assist in the identification of problem areas and the development of remedial plans wherever appropriate.
 - 8 Managers and supervisors meet regularly with the people designated to manage the EEO Program to be certain that Mountain Line's policies are being followed.
 - 9 The HR Specialist ensures that the procedures used to screen applicants do not unlawfully discriminate against any protected group.
 - 10 The HR Specialist and Human Resources Manager advise Mountain Line regarding federal regulations requiring posting, non-segregated facilities, etc. One of the criteria considered when evaluating the work performance of managers and supervisors is their effort to ensure Equal Employment Opportunity within their area of responsibility.
 - 11 Managers and supervisors are charged with taking reasonable steps to prevent harassment and/or intimidation of employees because of race, color, religion, national origin, sex (including gender identity, sexual orientation, and pregnancy), age, genetic information, disability, veteran status or other protected class or disability.
 - 12 Information Technologies assists with the dissemination of information regarding Mountain Line employment opportunities and EEO policies. The Mountain Line website shall present this information as well as a statement concerning Mountain Line's commitment to encouraging diversity within its workforce.
 - 13 Purchasing ensures that all contractors and suppliers are informed regarding Mountain Line's EEO policies.

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Section IV: Workforce Utilization Analysis & Narrative

Annually, Mountain Line conducts an Employment Practices Statistical Analysis and, from that analysis, creates a narrative explaining the source of the data and the results of the analysis. See Attachment B for the most recent analysis and narrative completed for the previous fiscal year.

As Mountain Line has grown to over 100 employees, it has transitioned from an abbreviated EEO program to a full EEO program. The successful implementation of Mountain Line's EEO program involves careful, ongoing analysis of the demographic composition of the Mountain Line region workforce. Before any conclusions may be drawn concerning the representation of minorities and women in the Mountain Line workforce, responsible parties must have access to a range of current, accurate demographic data. To accomplish this, information is gathered concerning the overall makeup of the Mountain Line workforce as well as the dispersion of protected groups among various job groups and salary ranges at different job sites. This information is then compared to the availability of qualified candidates in the surrounding community to identify areas where possible under-representation may exist.

Workforce analysis is done as a two-part process. Part I of the workforce analysis looks at the total number of employees in each of the government codes by race and gender, with each job title ranked from the lowest paid in each Division (or in the appropriate organizational unit). The second section of the Workforce analysis contains a listing of each job title in each Mountain Line work site in each of the EEO government categories, by job group, ranked from the lowest paid to the highest paid. Where the data considered in Part, I pertain to the Mountain Line workforce as a whole, the information presented in Part II pertains to individual functional units located throughout the Mountain Line Region. Both types of information are needed to accurately assess how protected groups participate within the Mountain Line workforce.

Narrative Utilization Analysis

A review of the data contained in the Utilization Table has resulted in the establishment of objectives to address underutilization of minorities and women in Mountain Line's workforce as compared to their availability in the community workforce as determined from census data from 2023-2024.

For the period October 31st, 2025, through April 1st, 2026, Mountain Line had a total of 134 different employees and was under-represented in 6 categories (*Executive/Senior Level Officials, First/Mid-Level Officials, Administrative Support, Craft/Laborers, Professional and Service Worker/Transit (Maintenance)*). 2 of the 10 areas evaluated were under-represented by less than 20%. Both areas underutilized vary by 15 or less persons as the groups are the smallest groups of our employment. Our largest employment group is Service Workers/Maintenance, which includes bus operators, and for the last analysis

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period this group employed 7% less minority groups than identified in available workforce.

For those categories where under-representation is greater than 10%, we have performed a review to establish goals to ensure these underutilized areas are addressed in the action plan for correction. Mountain Line periodically reviews employment practices and procedures to determine if they are neutral in intent, yet discriminatory in effect. If any are problematic, Mountain Line will promptly seek ways to minimize or eliminate such impact.

The next section of the plan identifies specific objectives that support Mountain Line's commitment to make its workforce more reflective of community labor statistics, if possible.

Objectives

All minority categories are at least minimally underrepresented in one or more categories. As a result, Mountain Line will enhance its efforts to attract minority candidates in those specific categories and will evaluate our promotional and recruitment practices to ensure all groups receive equal opportunity to secure employment.

Steps to Achieve Objectives

As a regional transit authority, Mountain Line has access to various communities of diverse groups. The City of Flagstaff lies in close proximity to a number of Native American communities and is able to draw from educational institutes like Northern Arizona University and Coconino Community College.

Mountain Line will work to draw recruits from these areas which serve our population. In addition, we will attempt to present our opportunities to minority organizations as well as other groups within our region, to ensure employment opportunities are available to females as well as individuals from minority communities. This effort will improve our outreach programs and hopefully improve our use of underutilized categories.

Mountain Line is committed to making its workforce reflect the relevant available community workforce to ensure equal employment opportunity regardless of race, ethnicity, national origin, or gender.

Program of Corrective Actions:

A review of the data contained in the employment practice analysis table has resulted in the establishment of objectives to address underutilization of minorities and women in Mountain Line's workforce as compared to their availability in the community workforce as determined from census data in FFY2026. Below are the action steps to help Mountain Line achieve some of its objectives.

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- Contact educational institutions to inform students of opportunities with Mountain Line.
- Attend job fairs sponsored by community organizations and state agencies to cultivate an interest in employment with Mountain Line.
- Develop list of minority and female-based organizations, including related publications. Identify contacts and advertise open positions with these groups.
- Review and update continually Mountain Line's recruitment methods, practices and policies to promote equal opportunity through recruitment efforts.
- Monitor recruitment policies and procedures to determine whether recruitment efforts are enabling Mountain Line to meet and maintain African American, Hispanic, Asian/Pacific Islander, American Indian/Alaskan Native and female objectives.
- Enhance mobility of all employees but also assure that opportunities for advancement are equally distributed while encouraging minority and female participation.
- Continue to provide EEO training to supervisors and managers on EEO policies, documentation, interview processes and employment requirements.

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SECTION V: MONITORING AND REPORTING PLAN

Updated: 4/22/2024

Standard Operating Procedure: EEO Monitoring & Reporting Log

Positions Responsible: HR Manager, Workforce Director

Other: CEO and General Manager

GOAL

To help ensure the EEO program is monitored and reported. This log will allow Mountain Line to see any trends within in the EEO program.

DEFINITION

To maintain FTA standards of an Equal Employment Opportunity program that is recognized by Mountain Line.

PROCEDURE

- 1 Incident/accident will occur that is alerted to the civil rights officer.
- 2 The civil rights officer will determine if the complaint is eligible under the EEO requirements.
- 3 If the complaint is found, the civil rights officer will begin the investigation process.
- 4 Civil rights officer will use the investigation form (template) for interviews and questions.
- 5 Civil rights officer will update the EEO Monitoring and Reporting log. This log presents date, complaint, service/program, summary of allegation, agency handling, investigator assigned, investigation notes, complaint or lawsuit, status, action/response required and signature of CEO/General Manager.
- 6 If case is founded, HR will alert the department that will need to take action with the team member. HR will also assist in meeting the team member. HR will also contact the person/team member who has sent in the complaint for case updates.
- 7 If case is not found, the case will be closed.
- 8 CEO/General Manager will sign off on all cases to determine no investigation issues.
- 9





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Attachment A: Excerpt of Personnel Policy Manual:

1 EQUAL EMPLOYMENT OPPORTUNITY

1.1 EQUAL EMPLOYMENT OPPORTUNITY AND UNLAWFUL HARASSMENT

Mountain Line is dedicated to the principles of equal employment opportunity. We prohibit unlawful discrimination against applicants or employees on the basis of age 40 and over, race, sex (including pregnancy and breastfeeding), color, religion, national origin, disability, military status, genetic information (including results of genetic testing), status as a registered medical marijuana cardholder, sexual orientation, gender identity and expression, or any other status protected by applicable federal, state, or local law.

Religious Accommodation

Mountain Line will make reasonable accommodation for qualified individuals with known disabilities unless doing so would result in undue hardship to the Company or cause a direct threat to health or safety. The Company will provide reasonable accommodation for employees whose work requirements interfere with a religious belief, unless doing so will result in undue hardship to Mountain Line. Employees needing such accommodation are instructed to contact their manager or Human Resources.

Harassment

Mountain Line strives to maintain a work environment free of unlawful harassment. In doing so, Mountain Line prohibits unlawful harassment because of age 40 and over, race, sex, color, religion, national origin, disability, military status, genetic information, sexual orientation, gender identity and expression, or any other status protected by applicable federal, federal, state, or local law.

Unlawful harassment includes verbal or physical conduct that has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment. Actions based on an individual's aged 40 and over, race, sex, color, religion, national origin, disability, military status, genetic information, sexual orientation, gender identity and expression, or any other status protected by applicable state or local law will not be tolerated. Prohibited behavior may include but is not limited to the following:

- Written form such as cartoons, e-mails, posters, drawings, or photographs.
- Verbal conduct such as epithets, derogatory comments, slurs, or jokes.
- Physical conduct such as assault or blocking an individual's movements.

This policy applies to all employees including managers, operations supervisors, co-workers, and non-employees such as customers, clients, vendors, consultants, or other individuals who come into Mountain Line's workplace.

Sexual Harassment

Mountain Line strongly opposes sexual harassment and inappropriate sexual conduct.

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Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature, when:

- Submission to such conduct is made explicitly or implicitly a term or condition of employment.
- Submission to or rejection of such conduct is used as the basis for decisions affecting an individual's employment; and
- Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

All employees are expected to always conduct themselves in a professional and businesslike manner. Conduct which may violate this policy includes, but is not limited to, sexually implicit or explicit communications whether in:

- Written form, such as cartoons, posters, calendars, notes, letters, and emails.
- Verbal form, such as comments, jokes, foul or obscene language of a sexual nature, gossiping or questions about another's sex life, or repeated unwanted requests for dates.
- Physical gestures and other nonverbal behavior, such as unwelcome touching, grabbing, fondling, kissing, massaging, and brushing up against another's body.

EEO / Harassment Complaint Procedure

If you believe there has been a violation of the EEO policy or harassment based the protected classes outlined above, including sexual harassment, please use the following complaint procedure. Mountain Line expects employees to make a timely complaint to enable Mountain Line to investigate and correct any behavior that may be in violation of this policy.

Report the incident to the EEO Officer, who will investigate the matter and take corrective action. Your complaint will be kept as confidential as practicable. If you prefer not to go to this individual with your complaint, you should report the incident to CEO and General Manager (or such person serving in such position).

Mountain Line prohibits retaliation against an employee for filing a complaint under this policy or for assisting in a complaint investigation. If you perceive retaliation for making a complaint or your participation in the investigation, please follow the complaint procedure outlined above.

If the Company determines that an employee's behavior is in violation of this policy, disciplinary action will be taken, up to and including termination of employment.



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1.2 DIVERSITY MANAGEMENT

“Diversity and Inclusion” refers to a broad range of activities, policies, and practices that, taken together, create a working environment where individual differences are recognized and valued. Mountain Line is committed to providing excellent customer service to a region that is home to many cultures. Mountain Line strives to take reasonable actions to recruit and retain a diverse workforce.

Some of the benefits Mountain Line derives from the diversity of its workforce are:

- Different viewpoints and perspectives in decision making.
- Greater innovation and creativity.
- A broad pool of qualified employees.

At Mountain Line, we value the richness that diversity brings to our workforce, making our organization better and the community we serve stronger. We are proud of our efforts to maintain a workforce that represents many backgrounds and are deeply committed to cultivating an environment where the contributions of every employee and citizen are respected.

At Mountain Line, we believe that diversity enriches our performance and services, the community in which we live and work, and the lives of our employees. As our workforce evolves to reflect the growing diversity of our communities and global marketplace, our efforts to understand, value, and incorporate differences become increasingly important.

1.3 AMERICANS WITH DISABILITY ACT (ADA) AND AMENDMENT (ADAAA)

The Americans with Disabilities Act (ADA) and the Americans with Disabilities Amendments Act (ADAAA) are federal laws that require employers not discriminate against applicants and individuals with disabilities and, when needed, to provide reasonable accommodations to applicants and employees who are qualified for a job, with or without reasonable accommodations, so that they may perform the essential job duties of the position.

It is Mountain Line’s policy not to discriminate against qualified individuals with disabilities in regard to application procedures, hiring, advancement, discharge, compensation, training or other terms, conditions and privileges of employment. In furtherance of this policy, Mountain Line has designated an ADA Coordinator to ensure that this policy is complied with in all aspects.

Mountain Line is committed to providing reasonable accommodation that will allow its employees with disabilities to contribute to the best of their ability.

Terms Used in This Policy

As used in this ADA policy, the following terms have the indicated meaning:

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- **Disability:** A physical or mental impairment that substantially limits one or more major life activities of the individual, a record of such an impairment, or being regarded as having such an impairment.
- **Major life activities:** Term includes caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working.
- **Major bodily functions:** Term includes physical or mental impairment such as any physiological disorder or condition, cosmetic disfigurement or anatomical loss affecting one or more body systems, such as neurological, musculoskeletal, special sense organs, respiratory (including speech organs), cardiovascular, reproductive, digestive, genitourinary, immune, circulatory, hemic, lymphatic, skin, and endocrine. Also covered are any mental or psychological disorders, such as intellectual disability (formerly termed “mental retardation”), organic brain syndrome, emotional or mental illness and specific learning disabilities.
- **Substantially limiting:** In accordance with the ADAAA final regulations, the determination of whether an impairment substantially limits a major life activity requires an individualized assessment, and an impairment that is episodic or in remission may also meet the definition of disability if it would substantially limit a major life activity when active. Some examples of these types of impairments may include epilepsy, hypertension, asthma, diabetes, major depressive disorder, bipolar disorder, and schizophrenia. An impairment, such as cancer that is in remission but that may possibly return in a substantially limiting form, is also considered a disability under EEOC final ADAAA regulations.
- **Direct threat:** A significant risk to the health, safety, or well-being of individuals with disabilities or others when this risk cannot be eliminated by reasonable accommodation.
- **Qualified individual:** An individual who, with or without reasonable accommodation, can perform the essential functions of the employment position that such individual holds or desires.
- **Reasonable accommodation:** Includes any changes to the work environment and may include making existing facilities readily accessible to and usable by individuals with disabilities, job restructuring, part-time or modified work schedules, telecommuting, reassignment to a vacant position, acquisition or modification of equipment or devices, appropriate adjustment or modifications of examinations, training materials or policies, the provision of qualified readers or interpreters, and other similar accommodations for individuals with disabilities.
- **Undue hardship:** An action requiring significant difficulty or expense by the employer. In determining whether an accommodation would impose an undue hardship on a covered entity, factors to be considered include:
 - The nature and cost of the accommodation.
 - The overall financial resources of the facility or facilities involved in the provision of the reasonable accommodation, the number of people



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- employed at such facility, the effect on expenses and resources, or the impact of such accommodation on the operation of the facility.
- The overall financial resources of the employer; the size, number, type, and location of facilities.
- The type of operations of the company, including the composition, structure, and functions of the workforce; administrative or fiscal relationship of the particular facility involved in making the accommodation to the employer.
- Essential functions of the job: Term refers to those job activities that are determined by the employer to be essential or core to performing the job; these functions cannot be modified.

The examples provided in the above terms are not meant to be all-inclusive and should not be construed as such. They are not the only conditions that are considered to be disabilities, impairments or reasonable accommodations covered by the ADA/ADAAA policy.

Process

When an individual with a disability requests accommodation and can be reasonably accommodated without creating an undue hardship or causing a direct threat to workplace safety, he or she will be given the same consideration for employment as any other applicant. Applicants who pose a direct threat to the health, safety and well-being of themselves or others in the workplace when the threat cannot be eliminated by reasonable accommodation will not be hired.

Mountain Line will reasonably accommodate qualified individuals with a disability so that they can perform the essential functions of a job unless doing so causes a direct threat to these individuals or others in the workplace and the threat cannot be eliminated by reasonable accommodation or if the accommodation creates an undue hardship to Mountain Line. Contact Mountain Line's ADA Coordinator with any questions or requests for accommodation.

All employees are required to comply with Mountain Line's safety standards. Current employees who pose a direct threat to the health or safety of themselves or other individuals in the workplace will be placed on leave until an organizational decision has been made in regard to the employee's immediate employment situation.

Individuals who are currently using illegal drugs are excluded from coverage under the company ADA policy.

The ADA Coordinator in conjunction with our HR division is responsible for implementing this policy, including the resolution of reasonable accommodation, safety/direct threat and undue hardship issues.



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Complaint Form and Procedures

Any individual who believes that they have been subjected to unequal treatment or discrimination prohibited by the ADA may file a written complaint with the ADA Coordinator. A formal complaint must be filed within 180 days of the alleged occurrence or when the alleged discrimination became known to the complainant. A complaint form follows this policy.

2.1 Status of Positions

- **Full-Time:** Full-time employees are scheduled to work at least 30 hours per week. Generally, Full-Time employees are eligible for Mountain Line's benefit package, subject to the terms, conditions, and limitations of each benefit program.
- **Part-Time 20+:** Part-time 20+ employees are scheduled to work less than 30 hours per week and more than 20 hours per week. Part-time 20+ employees are eligible for benefits provided by Mountain Line, subject to the terms, conditions, and limitations of each benefit program.
- **Part-Time 20-:** Part-time 20- employees work less than 20 hours per week and are not eligible for most benefits provided by Mountain Line. Part-time 20- employees are not regularly scheduled to work and accept assignments as needed or requested. An employee working less than 20 hours per week may not be eligible for some types of paid leave except as required by law. Holiday pay is pro-rated to applicable time worked during the holiday.

2.6 Education and Staff Training

Mountain Line encourages its employees to grow professionally through training and education. Managers may identify training needs and provide the opportunity for an employee to enroll in courses or seminars which will increase the individual's ability to contribute to Division goals.

Courses must have a direct relationship to an employee's current job and the Division's goals. Sufficient funds must be available in the Division budget to cover proposed training. Training courses which may have Mountain Line region impact or usefulness will be developed in cooperation with the Human Resources Manager

Mountain Line will not pay tuition or provide release time to an employee to attain a university degree. However, a flexible schedule or a leave of absence without pay may be considered but must be approved by the CEO and General Manager.

5.2 Disciplinary Procedures

Employees are expected to maintain certain standards of job performance and good conduct. When performance or conduct does not meet Mountain Line's standards, Mountain Line may provide the employee a reasonable opportunity to correct the deficiency. If the employee fails to make the correction, the employee will be subject to disciplinary action, which may include employment termination. The choice to use any form of discipline may be based on a desire to help an employee improve or correct the employee's conduct or performance.



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The procedures described in this section are often utilized by managers in response to inappropriate performance or other work-related behavior. Disciplinary action should be considered as a constructive means of dealing with unacceptable behavior or performance deficiencies on the part of an employee. Accordingly, such action should be appropriate to the seriousness of the infraction. Normally, except for significant misconduct, a manager will initiate disciplinary action only after having counseled the employee and found that the performance remains unsatisfactory. As part of this process, an employee may be required to attend the Employee Assistance Program (EAP).

Mountain Line normally uses a system of progressive discipline to address unacceptable work performance or behavior, although discipline is not required to be applied in a progressive nature if the severity of the offense warrants more severe consequences. If it is deemed appropriate, a manager may begin with any of the actions below, depending upon the severity of the behavioral or performance problem.

The Human Resource Manager (HRM) must be consulted prior to any disciplinary action as outlined below. Human Resource Manager review and approval of documents is required, and the HRM will be present for all disciplinary meetings. If the HRM is unavailable, the Human Resource Specialist (HRS) may act in this capacity.

Description of progressive discipline procedures

Documented Verbal Warning

When an employee's work performance or behavior is such that disciplinary action is called for, but the problem is not serious enough to warrant a written warning being placed in the employee's personnel file, a documented verbal warning may be used. This action involves meeting with the employee to discuss the problem and to clarify the necessary steps that the employee must take to correct the problem. A documented verbal warning must specify an evaluation period. The documented verbal warning will be agreed to and signed by the employee. An employee may submit a written response to a documented verbal warning and will be expected to comply with agreements made. The documented verbal warning will only be placed in the employee file for the specified period and then destroyed after a year if the problem behavior does not recur. If there is another occurrence, the documented verbal warning may be kept in the employee's personnel file and used as the basis for further disciplinary action. A documented verbal warning may be accompanied by a coaching log. A documented verbal warning is not an action which may be appealed through Mountain Line's grievance process.

Written Warning

The procedure for issuing a written warning to an employee shall be the same as that utilized for a documented verbal warning. The two actions differ in that a written warning informs an employee that further disciplinary action up to and including termination is certain to follow if there is a further occurrence of the problematic behavior or

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performance. An employee may submit a written response to a written warning if the employee disputes the contents of the written warning. The written warning and the employee's response shall be placed in the employee's personnel file. A written warning is not an action which may be appealed through Mountain Line's grievance process.

Written Warning with Disciplinary Suspension up to 3 days

The procedure for issuing a written warning with disciplinary suspension shall be the same as that utilized for a written warning. A written warning with disciplinary suspension is a written warning to document a repetitive performance issue and includes a suspension from work without pay. Employees may not be suspended without pay for more than 3 days. An employee may submit a written response to a written warning with disciplinary suspension if the employee disputes the contents of the written warning. The written warning with disciplinary suspension and the employee's response shall be placed in the employee's personnel file. A written warning with disciplinary suspension of up to 3 days is not an action which may be appealed through Mountain Line's grievance process.

Written Warning with Disciplinary Suspension more than 3 days

The procedure for issuing a written warning with disciplinary suspension shall be the same as that utilized for a written warning. A written warning with disciplinary suspension is a written warning to document a repetitive performance issue and includes a suspension from work without pay.

Employees may not be suspended without pay for more than 3 days. An employee may submit a written response to a written warning with disciplinary suspension if the employee disputes the contents of the written warning. The written warning with disciplinary suspension and the employee's response shall be placed in the employee's personnel file. A written warning with disciplinary suspension of up to 3 days is not an action which may be appealed through Mountain Line's grievance process.

Administrative Leave

Administrative leave is an action, supported by a written Administrative Leave document, that places the employee in leave status with or without pay for up to 30 days to complete an investigation. The employee may use their own paid leave when on unpaid administrative leave. An employee may submit a written response to an Administrative Leave document if the employee disputes the contents of the written warning. The Administrative Leave document and the employee's response shall be placed in the employee's personnel file. Administrative Leave is not an action which may be appealed through Mountain Line's grievance process. Administrative Leave will conclude with completion of the investigation, and the employee will either be returned to work, with or without additional disciplinary action, or terminated. Should additional disciplinary action or termination be necessary, the policies related to those actions shall apply.

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Performance Improvement Plan

The Performance Improvement Plan (PIP) is a specific, time-based set of actions that an employee is instructed to perform to bring substandard work performance or behavior up to an acceptable level. The Performance Improvement Plan must include a description of the actions to be taken and the time allotted, along with an explanation of the standards that will be used to evaluate the employee's success or failure. The Performance Improvement Plan may be initiated at any time during an individual's term of employment and may be used independently or in conjunction with other disciplinary actions. The Performance Improvement Plan must be presented to the employee in writing, along with an explanation of the consequences to the employee if the plan is not followed. The Performance Improvement Plan will be agreed to and signed by the employee when the document is presented. An employee may not submit a written response to the Performance Improvement Plan and will be expected to comply with agreements made. When the time allotted for the Performance Improvement Plan has ended, the employee must be given a written statement confirming whether the employee has completed the Performance Improvement Plan successfully. The performance improvement plan is not an action which may be appealed through Mountain Line's grievance process. Should additional disciplinary action or termination be necessary, the policies related to those actions shall apply.

Demotion or Termination

The purpose of demotion and termination is to remove an employee from the position due to ongoing or repetitive performance issues, including violation of policies. Demotion may be available to an employee that has recently changed positions as long as they are still on probation and the prior position is vacant (see Compensation and Classification Manual for definition of demotion). Termination will be the last action taken when all other steps under progressive discipline have been exhausted or when issue or violation is egregious in nature.

The Human Resources Manager and the CEO and General Manager must be consulted prior to any written warning with disciplinary suspension of more than 3 days, administrative leave, performance improvement plan, administrative probation, demotion, or termination. Before placing a regular employee on suspension of more than three days without pay, providing demotion, or moving to termination, the manager must give the employee a preliminary written notice of the Proposed Disciplinary Action, stating the date it is intended to become effective and the specific grounds and particular facts upon which the action is based. At least one working day before the action becomes final, the employee may respond to the manager either orally or in writing (or both) regarding the proposed action.

After considering the employee's response to written warning with suspension of more than 3 days, demotion, or termination, management will notify the employee as to whether the Proposed Disciplinary Action has become final as well as employee's right to formally grieve the adverse action. If no response is received, the Proposed Disciplinary Action will take effect as planned.

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In all cases of suspension and administrative leave the employee will be required to return to their manager, or the Facilities Manager, or other company designee, their Mountain Line identification card and electronic access device/keys. In case of termination, the employee will also be required to return their uniforms and all other Mountain Line issued items. In all circumstances, the employee will not be permitted to return to the Main Office (unless returning as a transit customer to purchase bus passes), nor return to the Mountain Line Employee Only Downtown Connection Center (DCC). The employee will be allowed to ride the buses and be at stops/connection centers, unless their behavior is such to warrant otherwise.

9.1 Seniority Practices

Employees transitioning to Mountain Line will maintain their seniority/tenure only within their originating program. Tenure in other Mountain Line service areas will be based on Mountain Line hire date. Seniority is first based on hire date within the program and second on Mountain Line hire date if part of a transitioned program.

Mountain Line Compensation and Classification Plan

Section 1.1 Recruitment, Examinations and Announcements of Vacancies:

Mountain Line's recruitment and selection procedures are established to facilitate the employment of a diverse, quality workforce and to ensure conformance to various Federal and/or State rules, regulations, laws, and statutes. Efforts to recruit candidates for Mountain Line employment are planned and carried out utilizing practices that ensure open competition. Mountain Line vacancies will be filled by promotion whenever possible. Such promotions may occur in or between Divisions.

Announcement of Vacancy

Upon receipt of request for staff from the Mountain Line Division, the Human Resources Division will prepare and distribute an announcement of vacancy. The hiring manager will designate whether the vacancy will be announced in-house first or simultaneously in-house and to the public. The announcement shall specify the title of the position, the salary range, minimum qualifications, typical duties, special qualifications, if any, examination requirements, if any, and the final date for receipt of applications. In general, in-house announcements will be posted for six days; outside announcements and simultaneous in-house and outside announcements will be posted for at least ten calendar days.

Applications

Following the distribution of an announcement of vacancy, the Human Resources Division will make available directions and information on the website used for application forms. Applications will not be made available for positions where vacancies do not exist. All applications shall be submitted on an official Mountain Line employment application form. Applications must be filed within the application website before the closing date as designated on the vacancy announcement.

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Examinations

Examinations will be practical in nature, and constructed or designed to evaluate the knowledge, skills, and abilities of the applicant for the particular type of work usually assigned to the class or position for which s/he is being examined.

The method of examining an applicant may be any one or a combination of the following:

- Written
- Oral
- Demonstration of performance
- any other valid form of examination

Testing accommodations may be made for disabled persons if requested.

Certification of Eligible Applicants

Managers use the following process for screening and ranking applicants. The hiring manager will receive and screen all applications using the criteria set forth on the notice of vacancy using the Human Resources Management System (HRMS). The HR Specialist, or other designee of the Human Resources Manager, may assist upon request of the Manager. Applicants who meet the minimum qualifications will be ranked using a hiring matrix, with points awarded for relevant experience, education, and any stated preferences. The applications of the highest ranked applicants (usually the six highest) will be eligible for further consideration.

Individuals meeting the definitions in A.R.S. 38-492 for civil service preference will receive 5 or 10 points in addition to those assigned during screening. This preference will be identified by the HR Specialist, and additional points will be forwarded by name to the Manager and is added to the final rating if the individual has already been found to meet the minimum qualifications for the position.

The names of all applicants who meet the minimum qualifications for the position are placed on a list in ranking order. This list is called a certification list and will be valid for a six-month period.

The top ranked applicants are contacted directly by the hiring manager or by the Human Resources Division (if requested). Personal interviews are conducted by the hiring manager and an approved panel of no less than 2 people.

The hiring manager has pre-determined, pre-approved interview questions with preferred answers. The responses to the questions asked during the interview will be manually recorded by the hiring manager.

The recorded answers will be compared to the preferred answers and scored. The highest scored candidate(s) will then be considered the best qualified applicant(s) subject to verification of the Motor Vehicle Report if applicable, reference checks, criminal background check if applicable, and previous performance review and



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evaluation. MVR, reference checks, and previous performance must all be deemed satisfactory in order for candidate(s) to be offered a position.

If not yet complete, the hiring manager or the Human Resources Division will provide the final shortlisted candidate(s) with background form(s) and reference check form(s). These documents are the applicants' consent to complete background & reference checking. There will be a provision within the document that asks specifically for names, telephone, email, mailing address of the applicants' references.

The hiring manager will record scores by candidate(s) on the Hiring Matrix and report the final selection(s) to the Human Resources Division. The hiring manager will notify all candidates who were interviewed but not selected of the decision. The selection must be from the certification list. The hiring manager with assistance from the Human Resources Specialist or Human Resources Manager is responsible for checking references and investigating the candidate's education and work history. If the results of these checks and investigations indicate the falsification of material facts on the application, the Human Resources Manager shall be notified in writing.

The selected candidates for safety sensitive positions as defined by the Federal Transit Administration will be subject to pre-employment screening and testing as per Mountain Line's FTA Drug and Alcohol Policy.

Section 1.3 Salary Plan (Section D)

When a Mountain Line employee applies and is selected for a different job at an equal or higher pay range; s/he may receive a salary increase in accordance with the Entry Salary section of this policy or under the following guidelines:

- If the employee's current pay rate is within the pay range of the new position, the hiring manager may recommend an increase not to exceed 4% of existing wage. Under no circumstances can the employee's new salary exceed the maximum of the new range.
- If the employee's current pay rate is below the minimum of the pay range of the new position, the employee's salary must be raised to the minimum of the pay range for the new position.
- If employee is moving into a position defined on the Step Table, the hiring manager may recommend an increase not to exceed 4% of existing wage. Under no circumstances can the employee's new salary exceed the maximum of the new range.
- If employee is moving from a step position to another step position, the hiring manager may recommend an increase not to exceed 4% of existing wage. Under no circumstances can the employee's new salary exceed the maximum of the new range.

This change will trigger a new annual review date and a new initial probation period. Time earned towards an increase in the existing (old) position will not be pro-rated and will have no bearing on pay in the new position.



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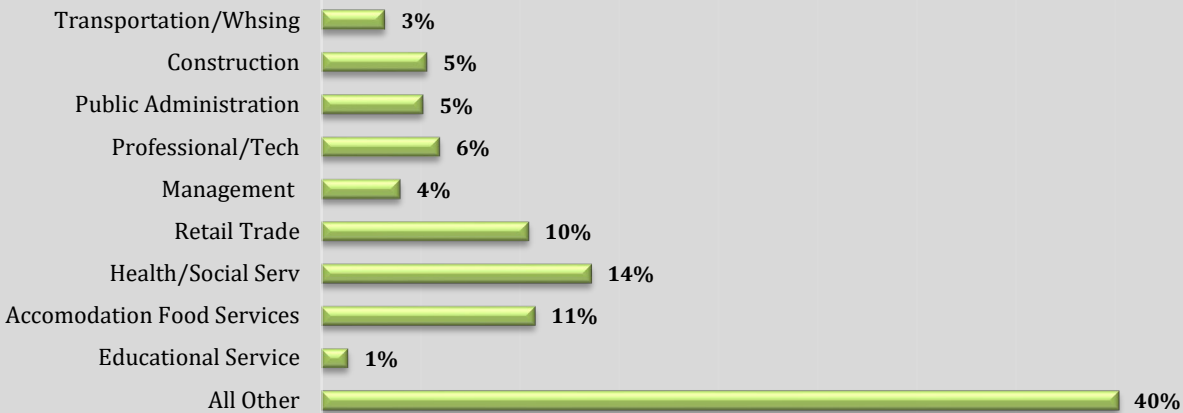
Attachment B: Human Resources Equal Employment Opportunity (EEO) Employment Practices Analyses Based on Federal Fiscal Year 2026

Narrative Employment Practice Analysis

FLAGSTAFF BACKGROUND INFORMATION AND CONSIDERATIONS

From 2023 to 2024, Flagstaff's employment grew at a rate of 3.15% from 39.7K employees to 41K (*respectfully, 40,970*) employees. The most common employment sectors for those who live in Flagstaff, AZ are as follows:

Based on 41,000 marketable employees



Mountain Line had 134 employees during the 1st half of the Federal Fiscal Year 2026. This accounts for all employees who were hired and terminated during the designated period. Mountain Line is part of the Public Administration sector. The 134 employees during the reporting period equated to 0.33% of all employment sectors and 6.07% of all Public Administration sector employees. The pool of marketable employees is extremely competitive.

We have concentration of women in Official and Administrative positions by 66.67% compared to the Flagstaff area population, but our minority employment about matches the minority status of the population. For Professional positions, Mountain Line is slightly under-represented for both minority and female population in our area. For Office/Clerical, we have a slight concentration of minority employees and under-representation of female employees compared to the pool of potential employees. Skilled Craft and Service/Maintenance positions are under-represented among minority

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employees compared to the available potential employment pool in the Flagstaff area, but female employees in these fields about match the available potential employee pool of females in the area.

We have had 3 applicants who were of veterans and people with disabilities, compared to one veteran who did not identify ethnicity or gender, two white non-Hispanic male veterans. We do not identify any under-representation or concentration of veterans and people with disabilities.

For those categories where under-representation or concentration is greater than 20%, we have performed a review to establish goals to ensure these underutilized areas are addressed in the action plan for correction. Mountain Line periodically reviews employment practices and procedures to determine if they are neutral in intent, yet discriminatory in effect. If any are problematic, Mountain Line will promptly seek ways to minimize or eliminate such impact. No practices or procedures were found to be problematic in this analysis.

All minority categories are at least minimally underrepresented in one or more categories. As a result, Mountain Line will enhance its efforts to attract minority candidates in those specific categories and will evaluate our promotional and recruitment practices to ensure all groups receive equal opportunity to secure employment.

Recruitment and Selection

The DATA USA for Flagstaff AZ webpage showed that the Mountain Line employment pool is limited to a majority of white non-Hispanic individuals (57.6%), followed by white Hispanic (5.68%), and American Indian and Alaska Native individuals (12.8%). Yet, as a regional transit authority, Mountain Line has access to various communities of diverse groups. The City of Flagstaff lies in close proximity to a number of Native American communities and is able to draw from educational institutes like Northern Arizona University and Coconino Community College.

Mountain Line draws recruits from these areas to attract new hires. In addition, we attempt to present our opportunities to minority organizations as well as other groups within our region, to ensure employment opportunities are available to females as well as individuals from minority communities. This effort will improve our outreach programs and hopefully improve our use of underutilized categories.

Mountain Line is committed to making its workforce reflect the relevant available community workforce to ensure equal employment opportunity regardless of race, ethnicity, national origin, or gender, color, religion, national origin, sex (including gender identity, sexual orientation, and pregnancy), age, genetic information, disability, veteran status or other protected class.

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This report is based on the following data, assumptions, and methodology:

- “DATA USA for Flagstaff AZ” webpage has been used to review the most current statistics as of 2024 for the Flagstaff, Coconino County, AZ diversity employment population. <https://datausa.io/profile/geo/flagstaff-az/>
- It should be noted that due to Mountain Line’s employment group size as compared to the various other employment opportunities in Flagstaff AZ, our current staff levels represent a diverse group of employees comparable to applicant availability.
- As per the new federal EEO reporting form, the compilation of diversity data will be broken into Female and Minorities. Non-Minority males will be excluded from diversity data.
- Mountain Line information has been used in comparison to data supplied by the 2020-2025 and 2024 American Comm Surveys for Coconino County, AZ.
- In-house applicant tracking of those applicants who elected to answer our areas of demographics at the time of their hire.

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