



**Milwaukee Metropolitan Sewerage District's**

## **2020 AFFIRMATIVE ACTION PLAN**



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## **I. EXECUTIVE SUMMARY**

The District has developed an Affirmative Action Plan and through adoption of this Plan, the District commits itself to proactive recruitment strategies aimed at achieving equal employment opportunity in all occupational levels of District service.

The Plan includes those Commission Policies that articulate the District's commitment to the principles of affirmative action, equal employment opportunity, nondiscrimination, and the prohibition of discriminatory harassment.

Section III provides an analysis of minority and female representation in the District, historical trends, and a comparison with the greater Milwaukee-Waukesha Metropolitan workforce. This section includes results of the Utilization Analysis, which helps to identify whether problems exist with underutilization of minorities and females in particular Job Groups.

Human Resources reviews the information provided by the utilization analysis and prior workforce analysis to identify specific challenges, and to develop a comprehensive action plan. Human Resources implements recruitment practices to fulfill immediate vacancies, while considering common barriers when recruiting minority and female candidates into non-traditional roles.

Section V of the 2020 Affirmative Action Plan highlights the responsibility for implementation of the Plan for the District. This section discloses that it is imperative for all members of the District to support and participate with ensuring equal employment opportunities. This would include support and participation from the Commission, as well as all District employees.

Section VI outlines various methods in which affirmative action objectives and regulations will be disseminated, as well as describes how the District will disseminate its nondiscrimination policies to internal and external sources. Section VII outlines the District's internal audit and reporting system.

## **II. POLICY STATEMENTS**

### **A. Commission Policy on Affirmative Action**

Commission Policy on Affirmative Action (1-77.52) states: The Milwaukee Metropolitan Sewerage District is committed to the principle of equal employment opportunity and deems the promotion of equal employment opportunity not only to be good public policy, but necessary for maximizing productivity and efficiency in District operations. If progress toward achieving equal employment opportunity is to be made, policies to remove any inequalities cannot be merely passive. Positive steps must be taken to remove conditions that could constitute barriers to the employment and retention of persons in protected groups. Positive steps also must be taken to ensure that the commitment to equal employment opportunity is part of all personnel practices, policies, and procedures.

To this end, the District's Human Resources Department is charged with the responsibility for developing an Affirmative Action Plan for the Commission's approval. In fulfilling affirmative action responsibilities, the Human Resources Department shall: (1) ensure that employment practices, policies, and procedures are analyzed to determine whether any of these create impermissible barriers to the achievement of equal employment opportunity; (2) develop and implement programs to enhance the achievement of and redress identified barriers to equal employment opportunity within the employment system; and (3) conduct an annual utilization analysis of the workforce to compare the District's utilization of minorities and women with the availability of minorities and women in the appropriate labor market.

Through adoption of this policy, the Commission commits the District and each of its operating divisions to a results-oriented personnel program aimed at achieving equal employment opportunity at all occupational levels of District service.

#### **B. Commission Policy on Nondiscrimination and Equal Employment Opportunity**

The Milwaukee Metropolitan Sewerage District is firmly committed to principles of equal employment opportunity. The District prohibits discrimination on the basis of age, race, color, creed, religion, disability, marital status, sex, sexual orientation, national origin, ancestry, citizenship status, arrest or conviction record, membership in the National Guard, Reserves, or Regular Armed Forces, use of lawful products off District premises outside of working hours, or any other protected characteristic, as required by law. This policy applies to all practices relating to recruitment, selection, placement, testing, training, evaluation, transfer, promotion, layoff and recall, compensation, employee benefits, recreational programs, and all other terms and conditions of employment.

All District employees must act to maintain a working environment which promotes equal employment opportunity and which is free from prohibited discrimination. Any employee who engages in discriminatory conduct is subject to discipline, up to and including discharge.

Any employee who believes he or she has been the subject of prohibited discrimination should report the matter immediately to a supervisor, manager or to the person designated to receive such complaints by the Human Resources Manager. Any such reports will be investigated promptly, and will be kept confidential by District investigatory personnel as required by law.

#### **C. Commission Policy Prohibiting Discriminatory Harassment**

The Milwaukee Metropolitan Sewerage District has a long-standing policy of offering fair and equal employment opportunity to every person without regard to age, race, color, creed, religion, disability, marital status, sex, sexual orientation, national origin, ancestry, citizenship status, arrest or conviction record, membership in the National Guard, Reserves or Regular Armed Forces, use of lawful products off District premises outside of working hours, or any other protected characteristic, as required by law. The District also seeks to provide a work environment that is

free from harassment and intimidation based upon any protected characteristic, and specifically prohibits such harassment and intimidation.

Harassment and intimidation can arise from a broad range of physical or verbal behavior (by employees or by non-employees such as contractors or vendors). Such behavior can include, but is not limited to, the following types of conduct: physical or mental abuse; racial, ethnic or religious insults or slurs; unwelcome sexual advances or touching; sexual comments, jokes, stories or innuendoes; requests for sexual favors used as a condition of employment or affecting any personnel decision such as hiring, compensation, promotion, or termination; display of sexually explicit or otherwise suggestive materials; referring to another employee inappropriately, such as "doll" or "babe" or the like; making sexual gestures with hand or body movements; intentionally standing close to or brushing up against another employee; inappropriately staring at another employee or touching his or her clothing, hair or body; whistling at another employee; asking personal questions about another employee's sexual life; repeatedly asking out an employee who has stated that he or she is not interested.

Any such conduct that adversely affects working conditions or creates a hostile, intimidating or offensive working environment is totally inappropriate in the workplace and cannot be tolerated. Ensuring that such conduct does not occur is a serious concern for the District. It also should be a serious concern for each employee. The occurrence of prohibited harassment impairs the quality of the work environment and undermines efficiency to the detriment of all. Employees who engage in prohibited harassment or intimidation, moreover, also potentially may be held individually liable and subject to significant personal liability. All employees and management, therefore, should make every effort to ensure that such conduct does not occur.

The occurrence of prohibited harassment or intimidation against another employee will be treated as a serious offense. Any employee who engages in such harassment or intimidation is subject to discipline, up to and including discharge.

Any employee who believes he or she has been the subject of prohibited harassment or intimidation should report the matter immediately to a supervisor, manager, or the person designated to receive such complaints by the Human Resources Manager. All complaints will be investigated promptly and will be kept confidential by District investigatory personnel as required by law.

This policy reinforces the District's tradition of developing and maintaining a professional, efficient, and progressive organization comprised of people who respect and work effectively with one another. It is the responsibility of every employee to assist in upholding this tradition.

### **III. ANALYSIS OF CHALLENGES AND ACTION PLAN**

To evaluate the District's success in achieving an appropriate level of diversity, the percentages of minorities and females in the District's workforce are compared with their availability in the metropolitan area. Based on this analysis, the District can identify Job Groups within its

workforce currently experiencing underutilization of minorities and/or females and take the necessary action to ensure that no impermissible barriers to equal employment opportunity exist. The analysis and job groups are compared to the EEO Tabulation 2006-2010 (American Community Survey data) for the Milwaukee-Waukesha Primary Metropolitan Statistical Area (PMSA).

The EEO Tabulation 2006-2010 (5-year American Community Survey data) is sponsored by four Federal agencies including the EEOC, DOJ, OFCCP and the Office of Personnel Management, and is the number one Affirmative Action Data Source.

The component parts of the workforce and availability analysis, and the methodologies employed in these analyses, conform with detailed regulations published by the Office For Federal Contract Compliance Procedures.

#### A. Composition of District Workforce

The total number of District FTEs as of December 31, 2019 was 226, with 41 minorities (18%) and 94 females (42%). Representation in ethnic minority categories parallels the Milwaukee-Waukesha Primary Metropolitan Statistical Area<sup>1</sup> while female representation at the District was lower as compared to the Milwaukee-Waukesha Primary Metropolitan Statistical Area.

Figure 1

#### Employee Demographics by Race

■ White ■ Black ■ Hispanic ■ Asian

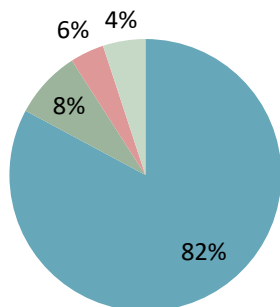
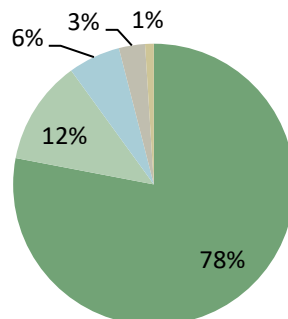


Figure 2

#### Available Labor Force by Race

■ White ■ Black ■ Hispanic ■ Asian ■ Other



<sup>1</sup> The Milwaukee-Waukesha Primary Metropolitan Statistical Area (PMSA) includes the following counties: Milwaukee, Ozaukee, Washington, and Waukesha.

*\*Figures rounded as appropriate*

Figure 3

### Employee Demographic by Gender

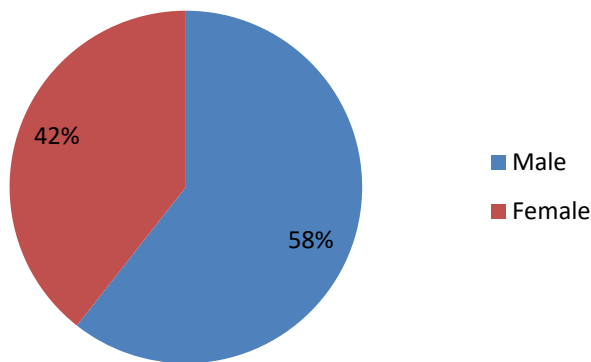
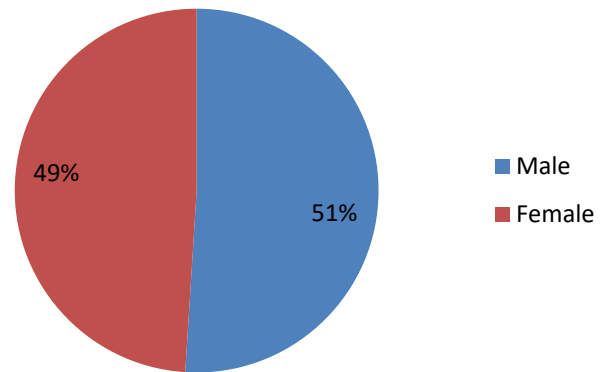


Figure 4

### Available Labor Force by Gender

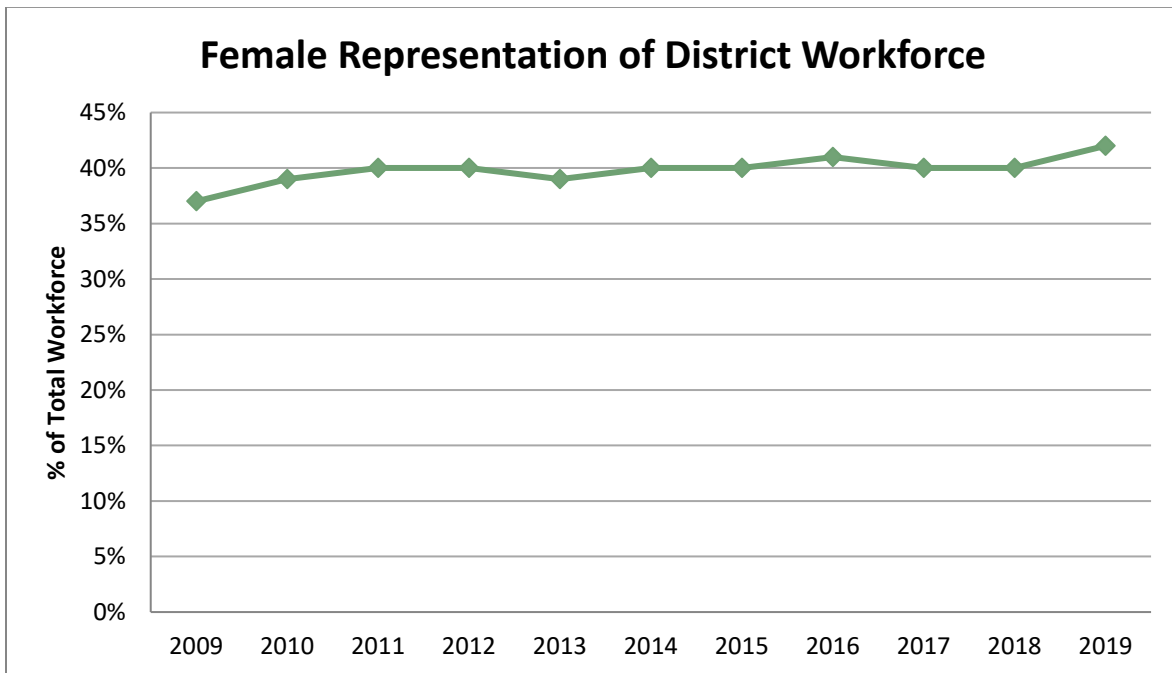
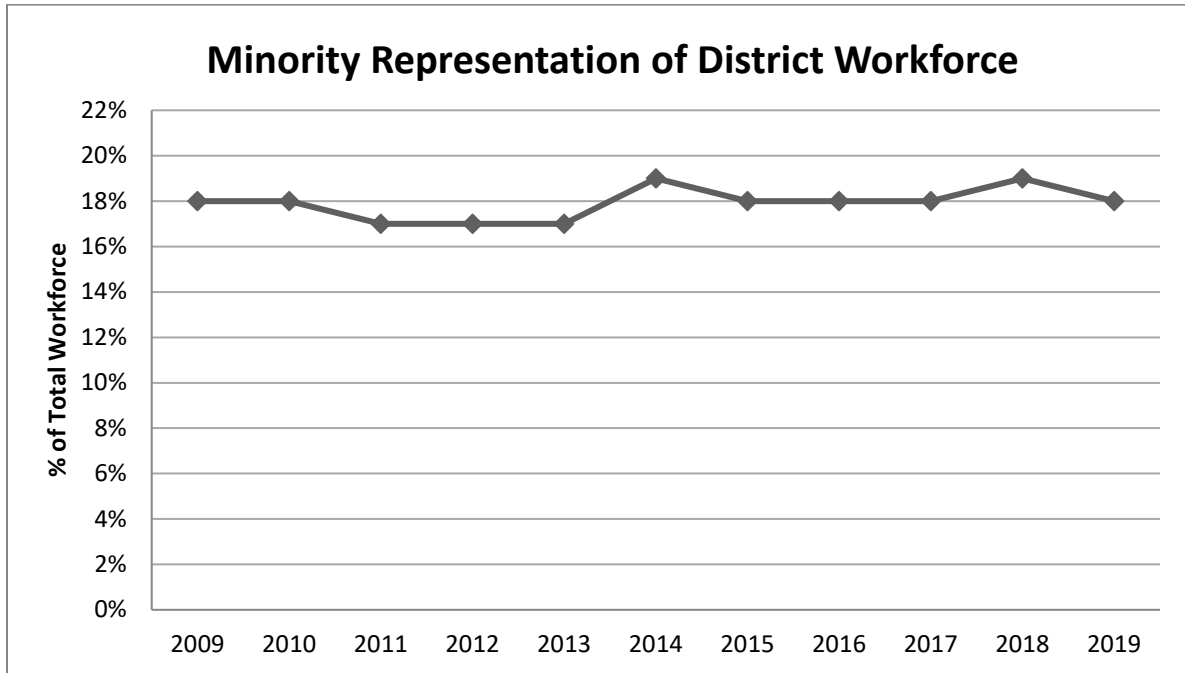


*\*Figures rounded as appropriate*

With 226 employees in 2019, minority representation decreased by 1%, to 18% when compared with 2018 data and female representation increased 2%, to 42% when compared to 2018 data.

The graphs on the following page show the trends of data over time and highlights the District's accomplishments and continued commitment to bringing protected classes to prominence and equal representation for employment purposes. In recent years, the District has remained steady in minority representation, and has seen an increase with female representation.

Figure 5





### **1. Utilization Analysis**

The District's Utilization Analysis indicates for each of the five Job Groups the total number of incumbents, the number and percentages of minority and female incumbents, as well as the availability percentages and whether underutilization exists. The ongoing objective of the Affirmative Action Plan is to achieve and maintain representation of minorities and females in reasonable relation to the group's labor market availability.

### **2. Underutilization Analysis**

Underutilization is defined as having fewer minorities or females in an EEO Job Group than would be expected by their availability in the labor force at large. Utilization Gap represents the difference between the number of minorities or females employed by the District in a Job Group, and the number that would be employed if District employment were exactly proportionate to minority and female representation in the Job Group throughout the metropolitan area. Underutilization is declared if there is a difference of 0.5 or more between actual minority and female representation within a Job Group as compared to the figure for full representation. Statistics must show underutilization by a whole person for a recruiting strategy to exist. The following tables summarize Job Groups currently experiencing underutilization.

### **3. Job Group Analysis**

To allow a realistic assessment of the relative representation of members of minority groups and females, the District aggregates positions into discreet groups that share basic similarities in wages, job content, and advancement opportunities. Pursuant to §60-2.17(b)(1), the District has reviewed the workforce by Job Group and determined that two of five job groups, (Professionals and Technicians) indicate underutilization for ethnic minorities as well as underutilization in female representation in three out of five Job Groups, (Professionals, Technicians, and Service Maintenance). The District has recruitment strategies for the Job Groups where ethnic minority and female representation is lower as compared to the Metropolitan Milwaukee-Waukesha Primary Metropolitan Statistical Area.

#### 4. Minority Utilization

The following table shows the percentage of minorities available in the five EEO Job Groups the District employs.

Table 1  
**2019 Utilization Analysis of Minorities**

Job Group Title	Total Count	Minorities	Present Representation	Market Availability	Standard for Full Utilization	# of Under-Utilized	Under-Utilized?
Officials and Managers	19	4	21%	13%	2	N/A	No
Professionals	113	17	15%	16%	18	1	Yes
Technicians	68	12	18%	21%	14	2	Yes
Administrative Support	24	6	25%	23%	6	N/A	No
Service Maintenance	2	2	100%	38%	1	N/A	No
<b>Totals:</b>	<b>226</b>	<b>41</b>				<i>*Figures rounded as appropriate</i>	

Job Group Title	Total Count	Minorities	Present Representation	Market Availability Milw Co	Standard for Full Utilization	# of Under-Utilized	Under-Utilized?
Officials and Managers	19	4	21%	21%	4	N/A	No
Professionals	113	17	15%	23%	26	9	Yes
Technicians	68	12	18%	31%	21	9	Yes
Administrative Support	24	6	25%	36%	9	3	Yes
Service Maintenance	2	2	100%	49%	1	N/A	No
<b>Totals:</b>	<b>226</b>	<b>41</b>				<i>*Figures rounded as appropriate</i>	

In 2019, the representation of minorities in the District's workforce was 18%, which decreased when reviewing 2018 data. Minority representation in the Milwaukee-Waukesha PMSA workforce was 22% and MMSD was underutilized in the minority population in two of the five Job Groups; Professionals and Technicians.

The key strategy to maintaining minority representation is diversification of the applicant pool. Tactics to diversify the applicant pool include representation at Diversity job fairs; partnerships with educational institutions and training agencies (cooperative education); advertisements on the Internet, and with minority associations; as well as the development of co-op/internship opportunities and expanding the District's Outreach Program to emphasize the District as a viable employer for women and minorities. Outreach includes an increase on social media platforms.

The 2019 Action Plan involved strategies to fill vacant positions with qualified ethnic minorities and these plans included the active involvement of the hiring department. The District hired a total of 19 fulltime employees in 2019. One of the hires was minority, or 5% of new hire activity. Three of the District's 18 departures were minority, or 17%. Appendix A details the applicant, new hire, promotion, and departure activity.

## 5. Female Utilization

The following table shows the percentage of females available in the five EEO Job Groups the District employs.

Table 2

### 2019 Utilization Analysis of Females

Job Group Title	Total Count	Females	Present Representation	Market Availability	Standard for Full Utilization	# of Under-Utilized	Under-Utilized?
Officials and Managers	19	9	47%	43%	8	N/A	No
Professionals	113	43	38%	57%	64	21	Yes
Technicians	68	20	29%	58%	39	19	Yes
Administrative Support	24	22	92%	65%	16	N/A	No
Service Maintenance	2	0	0%	43%	1	1	Yes
<b>Totals:</b>	<b>226</b>	<b>94</b>				<i>*Figures rounded as appropriate</i>	

Job Group Title	Total Count	Females	Present Representation	Market Availability (Milw Co)	Standard for Full Utilization	# of Under-Utilized	Under-Utilized?
Officials and Managers	19	9	47%	48%	9	N/A	No
Professionals	113	43	38%	58%	66	23	Yes
Technicians	68	20	29%	60%	41	21	Yes
Administrative Support	24	22	92%	73%	18	N/A	No
Service Maintenance	2	0	0%	60%	1	1	Yes
<b>Totals:</b>	<b>226</b>	<b>94</b>				<i>*Figures rounded as appropriate</i>	

#### B. 2020 Objectives

1. Increase utilization of minorities and females in all job groups; especially the Professionals, Technicians, and Service Maintenance Job Groups as vacancies occur.
2. Maintain or increase the total minority and female representation in MMSD's workforce.
3. Communicate core competencies for positions, provide training opportunities, and increase awareness so employees may prepare themselves to compete for future opportunities through succession planning and talent development opportunities.
4. The District will establish proactive activities in its recruitment, selection, and promotion processes to ensure our Equal Employment Opportunity Policies are in compliance. The Human Resources Department will continue to increase education of District hiring managers to enhance awareness of the benefits of having a diverse workforce and maintaining the objectives of affirmative action.
5. Human Resources staff has successfully established a joint recruitment plan with the hiring managers within MMSD divisions for positions in all

Job Groups. The Human Resources Department will continue to ensure that the recruitment plans include efforts aimed at meeting District objectives. In working cooperatively on these plans, Human Resources will continue to develop aggressive recruitment strategies to fulfill immediate vacancies, while considering common barriers to recruit minority and female candidates to non-traditional fields. In addition, Human Resources will attend job fairs that specifically target minority populations.

The District continuously works to cultivate diverse applicant pools for open positions. Human Resources will increase its feeder groups by continuing current relationships and building affiliations with the following:

Alverno College	Employ Milwaukee/Earn & Learn
Carroll University	MMSD WDTP
Department of Workforce Development	MSOE
Marquette University	UW-Milwaukee
MATC (Envi. Health & Water Quality Tech. Program)	UWM School of Freshwater Sciences
WI Youth Apprenticeship Program	UW-Platteville
Hispanic Professionals of Greater Milwaukee	

#### **IV. RESPONSIBILITY FOR AFFIRMATIVE ACTION AND EQUAL EMPLOYMENT OPPORTUNITY**

##### **A. Commission**

The Milwaukee Metropolitan Sewerage Commission supports the District's affirmative action efforts through policies that ensure equal opportunity in employment for applicants and current employees as well as prohibit discriminatory harassment. The Commission will continue to support the District's commitment to workforce diversity through the adoption and continuation of appropriate policies.

##### **B. Executive Director**

The Executive Director is responsible for ensuring that a District-wide Affirmative Action Plan is developed, implemented, and monitored. The Executive Director's responsibilities include periodic reports to the Commission on the District's efforts and results in attaining equal employment opportunity in hiring, and in terms and conditions of employment, and communicating the District's commitment to workforce diversity principles to all employees.

### **C. Human Resources Department**

The Human Resources Department is responsible for establishing and implementing policies and procedures that assist the District in fulfilling its commitment to provide equal employment opportunity for all applicants and employees. These include policies and procedures addressing: recruitment and selection criteria (including job descriptions, advertising and recruiting methods, application forms, testing and evaluation techniques, interview processes, and orientation); promotion and transfer procedures; implementation of career development strategies and professional skill development for all employees; wage and salary structures; benefits administration; and other terms and conditions of employment.

The Human Resources Department has responsibility for the development, execution and administration of the District's Plan. Some specific responsibilities include:

1. Support an environment that values individual and cultural diversity and fosters employee participation and ownership as a means of attaining the District's mission and overall strategic objectives.
2. Annually update the District's Affirmative Action Plan. The Plan will be updated and presented for approval on an annual basis and used as an administrative tool for assessing the District's success in fulfilling its workforce diversity commitments, removing barriers to equal employment opportunity, and allowing for increased representation by protected class individuals in Job Groups in which there is underrepresentation.
3. Provide ongoing guidance and assistance to managers and supervisors to promote equal employment opportunities in the process of recruitment and selection of new employees and training and promotion of existing employees as those processes occur.
4. Maintain record reporting to comply with state and federal record keeping requirements.
5. Evaluate the effectiveness of all activities and programs related to the Plan, and develop plans for corrections and improvements as necessary.
6. Assist managers and supervisors in resolving problems relating to equal employment opportunity, affirmative action and discriminatory harassment.
7. Regularly review policies and procedures to ensure they do not impermissibly impact protected classes.

8. Ensure the District complies with laws prohibiting discrimination and discriminatory harassment.
9. Serve as the District's Intake Advisor in equal employment opportunity and affirmative action complaints.
10. Continue training for employees on topics such as diversity and anti-discrimination laws (including discriminatory harassment).
11. Regularly audit employee training programs and hiring, promotion, supervisory, and termination patterns to ascertain potential adverse impact and to remove any impediments to equal employment opportunity.
12. Periodically audit District locations to ensure relevant postings and notices are properly displayed and that all facilities are maintained in a nondiscriminatory and fully accessible manner.
13. Serve as a liaison between the District and minority-oriented and female-oriented organizations, community groups, and other recruitment sources that may refer females, minorities, and disabled persons.
14. Gather and analyze exit interview data to identify existing barriers to attracting and retaining minority and female employees and develop action plans for improvement.

#### **D. Management**

Managers and Division Directors shall have the following responsibilities:

1. Encourage workforce diversity in all departmental activities.
2. Ensure all employees are provided training, coaching, and educational assistance for transfer and promotional opportunities.
3. Identify and take appropriate action to address discriminatory harassment of employees immediately when such harassment is suspected or perceived.

Division Directors are responsible for meeting objectives as established by the Executive Director to respond to the need for a diverse workforce.

Supervisors are responsible for conducting their responsibilities in a nondiscriminatory manner, ensuring that all employees are treated equally as required by law, and working with the Human Resources Department to formulate strategies for resolving any equal employment opportunity issues that come to their attention.

#### **E. All District Employees**

All District employees are responsible for supporting a work climate that is conducive to furthering the Commission's Policy on Affirmative Action, its Policy on Nondiscrimination and its Policy Prohibiting Discriminatory Harassment.

### **V. IMPLEMENTATION OF AFFIRMATIVE ACTION PROGRAMS**

The District has trained all personnel involved in recruitment, selection, promotion, discipline, and related processes regarding its Equal Employment Opportunity Policy. Training will continue to be conducted to all employees regarding diversity and harassment.

The District has developed programs to facilitate the attainment of equal opportunity in hiring and in all other terms and conditions of employment. The following programs or policies are among those implemented to facilitate this objective and to ensure all District employment policies and procedures are strictly job related.

#### **A. Job Descriptions, Qualifications, and Requirements**

Human Resources staff takes the following actions to ensure recruitment practices are nondiscriminatory and consistent with the objectives of this Affirmative Action Plan:

1. Analyze descriptions of open positions to ensure they accurately reflect position functions.
2. Evaluate job requirements for different job classifications to ensure requirements are consistent for the same job classification in all locations and free from discriminatory bias. To the extent any requirements appear to screen out a disproportionate number of persons in protected classes, such requirements will be carefully evaluated.
3. Make approved descriptions and qualifications available to all staff involved in the recruiting, screening, selection and promotion process.



## **B. Recruitment Practices**

Human Resources staff takes the following actions to ensure recruitment practices are nondiscriminatory and consistent with the objectives of this Plan:

1. Advise applicants of the District's policy of Equal Employment Opportunity in all printed and on-line employment advertisements.
2. Post promotional opportunities as appropriate.
3. Place advertisements in minority-oriented news media and female interest media.
4. Disseminate information regarding job opportunities and the District's affirmative action objectives to minority and female employment development agencies, professional associations and educational institutions having the potential to act as referral sources for minority and female candidates.
5. Expand recruitment efforts for underrepresented job classifications in order to increase the number of minority and female applicants for such jobs. These activities may include increasing District involvement with community-based organizations, participation in job and career fairs, and expanded public information programs.
6. Continuously monitor the recruitment process and results, and act to refocus efforts that are not resulting in a diverse applicant pool.
7. Collaborate with department staff to identify additional recruitment referral sources and strategies that will contribute to a diverse applicant pool. Encourage managers to develop relationships with potential referral sources as a means of enhancing the District's recruitment efforts.

## **C. Selection Practices**

Human Resources staff takes the following actions to ensure the selection process is job-related and eliminates any inappropriate barriers to the employment and promotion of females, minorities, and other protected groups:

1. Evaluate the selection process to ensure it is free from bias and does not hinder the District's ability to attain its equal employment opportunity objectives.

2. Orient all individuals involved in the interviewing process on proper techniques, inquiries, and documentation, and on the District's equal employment opportunity commitment.
3. Analyze selection procedures such as application forms, background checks, interviews, and physical examinations for possible discrimination against or exclusion of persons in protected groups, and eliminate any procedure that may not be job related.

#### **D. Promotion and Training Practices**

Management staff will take the following types of actions to ensure minorities and females are considered for promotion and to assist employees in advancing to jobs that offer more responsibility, challenge and further opportunity for advancement on an equal basis:

1. Through the District's Talent Development initiative, offer mentoring opportunities for female and minority employees to provide employees with access to a wider skillset and knowledge across the District, build relationships and preserve the intellectual capital of the organization.
2. Offer skills training and tuition reimbursement programs to assist employees in meeting performance standards and preparing for employment advancement.

#### **E. Supervisory and Disciplinary Practices**

The Human Resources staff takes the following actions to assist supervisors in meeting their Affirmative Action Plan responsibilities:

1. Develop and periodically review forms and instructions on supervisory practices such as interviews, employee evaluations, counseling, training, and discipline to ensure these are consistent with principles of equal employment opportunity.
2. Offer periodic training to supervisors on issues relating to equal employment opportunity including the requirements of laws prohibiting employment discrimination, discriminatory harassment, labor relations, etc.

#### **F. Benefits**

The Human Resources staff will review the District's employee benefits plans, coverage and administrative procedures to ensure that they do not inadvertently discriminate illegally

because of race, color, religion, sex, national origin, age, disability, and any other protected characteristic.

## **VI. POLICY DISSEMINATION**

### **A. Internal Dissemination**

In order to ensure complete employee cooperation and participation in the District's efforts to provide equal employment opportunity to applicants and employees, the District will communicate its nondiscrimination policies as follows:

1. The Commission's Policy on Nondiscrimination and Equal Employment Opportunity and its Policy Prohibiting Discriminatory Harassment will be posted on bulletin boards at each site, and communicated to each new employee. The Executive Director will reinforce the District's commitment to these policies.
2. The District will continue to display government equal employment opportunity posters and bulletin boards at conspicuous places in each of its facilities so that applicants, employees and visitors will know about state and federal anti-discrimination laws.
3. Periodic training sessions will continue to be held for all staff as a part of our ongoing effort to increase awareness on matters relating to cultural diversity, discrimination, and harassment in the workplace.
4. The District will continue to include nondiscrimination language in all employment-related policies and review them to ensure they are nondiscriminatory.

### **B. External Dissemination**

In order to ensure proper external dissemination of the Commission's Policy on Nondiscrimination and Equal Employment Opportunity, the following outreach activities will be undertaken:

1. The Commission's Policy on Nondiscrimination and Equal Employment Opportunity will be communicated to companies and personnel who provide goods or perform services for the District through contracts, subcontracts, bid awards, service, maintenance, or employee agreements, permits, or performance clauses as required. An Equal Opportunity clause will be included in covered purchase orders, contracts, etc.

2. The Commission's Policy on Nondiscrimination and Equal Employment Opportunity will continue to be transmitted verbally and in writing to all recruitment sources and to female, ethnic, and other organizations representing persons in protected classes.
3. Classified advertising for vacant positions in the District will inform the reader of the Commission's Policy on Nondiscrimination and Equal Employment Opportunity through use of the phrase, "MMSD is committed to equal employment opportunity and to nondiscrimination in all aspects of the employment relationship."
4. A statement of the District's commitment to equal employment opportunity and compliance with applicable nondiscrimination laws will continue to be included on the District's Application for Employment.

## **VII. INTERNAL AUDIT AND REPORTING SYSTEM**

The District's Reporting System has been designed to:

1. Enable measurement of program effectiveness
2. Indicate areas where remedial action may be needed

The reporting system maintains the following records to enable efficient and accurate analyses:

1. An applicant log that shows the date, name of applicant, ethnicity, sex, veteran status, referral source, position applied for, and application date.
2. Summary data of hires, promotions, reclassifications, demotions, training, disciplines, resignations, discharges, retirements, and layoffs by race and sex for the 12-month period immediately proceeding the new plan year.
3. Summary data of the current MMSD workforce that shows ethnicity and sex. Job Group titles, rather than individuals' names, are utilized to assure privacy. Data is current at the time of the annual report or for the 12-month period immediately proceeding the new plan year.

**APPENDIX A:**  
**APPLICANTS, NEW HIRES, PROMOTIONS/TRANSFERS & DEPARTURES**

**Applicant Information**

**2019**

<b>Job Code Number</b>	<b>Job Code Title</b>	<b># of Applicants</b>	<b>Minorities</b>	<b>Females</b>
01	Officials and Managers	14	0%	50%
02	Professionals	138	19%	28%
03	Technicians	303	21%	39%
06	Administrative Support	110	33%	86%
08	Service Maintenance	n/a	%	%

**2018**

<b>Job Code Number</b>	<b>Job Code Title</b>	<b># of Applicants</b>	<b>Minorities</b>	<b>Females</b>
01	Officials and Managers	6	0%	66%
02	Professionals	227	19%	41%
03	Technicians	34	29%	21%
06	Administrative Support	n/a	%	%
08	Service Maintenance	n/a	%	%

<b>New Hire Opportunities</b>				
	<b>2018</b>		<b>2019</b>	
	Number	% of Total Opportunities	Number	% of Total Opportunities
Total Opportunities	12	N/A	23	N/A
Minority	4	33%	1	5%
Female	7	58%	9	19%

<b>Internal Promotional/Transfer Opportunities</b>				
	<b>2018</b>		<b>2019</b>	
	Number	% of Total Opportunities	Number	% of Total Opportunities
Total Opportunities	6	N/A	24	N/A
Minority	0	0%	1	4%
Female	2	33%	11	46%

<b>District Departures</b>				
	<b>2018</b>		<b>2019</b>	
	Number	% of Total Departures	Number	% of Total Departures
Total Departures	10	N/A	18	N/A
Minority	3	30%	3	17%
Female	4	40%	7	39%

**APPENDIX B:**  
**ADVERTISEMENT MEDIUMS**

<b>Organizations</b>	<b>Targets</b>
American Society of Civil Engineers	Diverse groups
Central States Water Environment Association	Professionals
Department of Workforce Development Vocational Rehabilitation	Diverse groups
DICE.com	Diverse groups
Federation of Environmental Technicians	Diverse groups
Global Water Institute	Diverse groups/Professionals
Governmentjobs.com	Diverse groups
Great Lakes Institute	Diverse groups/Professionals
Hispanic Professionals of Greater Milwaukee	Diverse groups/Professionals
League of Wisconsin Municipalities	Diverse groups
Milwaukee Community Journal	African Americans
MilwaukeeJobs.com	Diverse groups
Monster.com	Diverse groups
National Association of Women Lawyers	Women
National Bar Association	African Americans
National Forum for Black Public Administrators (NFBPA)	Professionals/African Americans
National Society of Black Engineers	African Americans
School of Freshwater Sciences	Diverse Groups/Professionals
Society of Hispanic Professional Engineers	Hispanics
Society of Women Engineers	Women
Spanish Journal	Hispanics
State Bar of Wisconsin	Diverse groups
Water Environment Federation	Diverse groups
WaterandWastewaterJobs.com	Diverse groups
Wisconsin Association of African-American Lawyers	African Americans
WisconsinDiversity.com	Diverse groups
Wisconsin Job Center	Diverse Groups/Veterans
Wisconsin Law Journal	Diverse groups
Wisconsin City/County Management Association	Diverse groups

**APPENDIX C:**  
**TABLE 3 – FILLED POSITIONS BY GROUP**

*The following listing shows the classifications of 2019 positions.*

<b>Job Group Code</b>	<b>Job Group Title</b>	<b>MMSD Job Titles</b>
<b>01</b>	<b>Officials &amp; Managers</b>	
		Capital Program Support Manager
		Chief Administrative Officer
		Controller
		Deputy Director of Finance
		Director of Community Outreach & Bus Engagement
		Director of Legal Services
		Director of Finance/Treasurer
		Director of Information Systems
		Director of Planning, Research & Sustainability
		Director of Technical Services
		Director of Water Quality Protection
		Engineering Design Manager
		Executive Director
		Human Resources Manager
		Information Governance Manager
		Laboratory Manager
		Manager of Contract Compliance
		Manager of Engineering Planning
		Manager of Sustainability
		Procurement & Business Development Manager
<b>02</b>	<b>Professionals</b>	
		Accountant
		Agronomist
		Application Development Supervisor
		Asset Management Analyst
		Asset Management Analyst II
		Asset Management Data Coordinator
		Asset Management Program Director
		Auditing and Loan Administrator
		Construction Support Manager
		Contract Compliance Administrator
		Contract Compliance Assistant Manager
		Conveyance Systems Data Supervisor



<b>Job Group Code</b>	<b>Job Group Title</b>	<b>MMSD Job Titles</b>
		Digital Marketing Specialist
		Environmental Research Manager
		Facilities Supervisor
		Fresh Water Resources Monitoring Supervisor
		General Supervisor – Field Monitoring
		GIS Supervisor
		GIS Analyst
		Human Resources Generalist
		Hydraulic Modeler & Analyst II
		Industrial Waste Pretreatment Coordinator
		Infrastructure Analyst
		Intergovernmental Coordinator
		IT Infrastructure Supervisor
		IT Operations Supervisor
		IT Security Engineer
		IT Senior Infrastructure Analyst
		IT Senior Operations Analyst
		Laboratory Chemist
		Laboratory Project Manager
		Laboratory Team Supervisor
		Management & Budget Analyst III
		Marketing Manager
		Marketing Specialist
		MCRR Project Engineer
		Microbiologist
		Milorganite® Operations Manager
		Neighborhood Outreach Coordinator
		Outreach Program Coordinator
		Plants Program Manager
		Procurement Specialist
		Procurement Supervisor
		Program Manager - Greenseams®
		Project Controls Supervisor
		Project Engineer
		Project Manager
		Project Manager PPI/I
		Public Information Manager
		Quality Assurance Specialist
		Real Estate Generalist

Job Group Code	Job Group Title	MMSD Job Titles
		Real Estate Specialist
		Risk Manager
		Safety Advisor
		Section Manager
		Senior Data Warehouse Analyst
		Senior Human Resources Generalist
		Senior Industrial Waste Engineer
		Senior Project Manager
		Senior Project Manager – non PE
		Senior Project Manager II
		Senior Project Manager – Electrical
		Senior Project Planner
		Senior Staff Attorney
		Senior Systems Analyst
		Strategic Accounts Specialist
		Supervisor of Payroll and Accounts Payable
		Supervisor Revenue and Fixed Assets
		Supplier Diversity Specialist
		Surveying Services Supervisor/SPM
		Systems Analyst
		SWMBE Coordinator
		Water Resources Program Manager
		Web Application & Site Developer
<b>03</b>	<b>Technicians</b>	
		CAD Coordinator
		CAD Technician
		Engineering Aide
		GIS Data Coordinator
		GIS Technician
		Graphics Designer
		IT Operations Analyst
		IT Operations Technician
		Laboratory Technician
		LIMS System/Database Analyst
		Monitoring/Sampling Shop & Field Technician
		Monitoring/Sampling Specialist
		Monitoring/Sampling Technician
		Network Specialist
		Project Surveyor

<b>Job Group Code</b>	<b>Job Group Title</b>	<b>MMSD Job Titles</b>
		Quality Assurance Inspector
		Senior GIS Data Coordinator
		Survey Technician
		System Monitoring Data Analyst
		Water Resources Specialist
<b>06</b>	<b>Administrative Support</b>	
		Account Specialist
		Administrative Assistant
		Administrative Coordinator
		Customer Services Coordinator
		Human Resources Coordinator
		Paralegal Administrator
		Payroll Specialist
		Project Controls Analyst
		Project Controls Specialist
		Receptionist
		Records Information Management Technician
		Safety & Risk Management Specialist
		Technical Services Coordinator
<b>08</b>	<b>Service/Maintenance</b>	
		Facilities Technician I
		Facilities Technician II
		Laboratory Helper

**TABLE 4 – INTERNAL AVAILABILITY SOURCES**

*The following listing suggests feeder groups identified for the established Job Groups.*

<b>Job Group Code</b>	<b>Job Group Title</b>	<b>Feeder Group*</b>
<b>01</b>	<b>Officials and Managers</b>	Professional New Recruits
<b>02</b>	<b>Professionals</b>	Administrative Support Technicians Service/Maintenance Interns/Work Study/Co-Ops New Recruits
<b>03</b>	<b>Technicians</b>	Service/Maintenance Apprentices Interns/Work Study/Co-Ops New Recruits
<b>06</b>	<b>Administrative Support</b>	Interns/Work Study/Co-Ops New Recruits
<b>08</b>	<b>Service/Maintenance</b>	New Recruits

**EEO Tabulation 2006-2010 (5-year ACS data); U.S. Census Bureau, number one Affirmative Action Data Source.** EEO Tabulation breaks down the population of the Primary Metropolitan Statistical Area into eight categories which are similar to those used on the EEO-4 Form.

**EEO-4 Job Group Titles** – Consists of a total of eight Job Groups for the State and Local Government database. MMSD employs individuals within five of the eight Job Groups.

**Minority** – Includes all races besides “White, Non-Hispanic.” See Race/Ethnicity

**Occupational Categories** – Specific to those used by State and local governments. The occupational categories for the updated Equal Employment Opportunity Commission report (EEO-4), that the District utilizes are as follows:

**Officials and Managers** - Occupations requiring administrative and managerial personnel who set broad policies, exercise overall responsibility for execution of these policies, and direct individual departments or special phases of a firm's operations

**Professionals** - Occupations requiring either college graduation or experience of such kind and amount as to provide a comparable background

**Technicians** - Occupations requiring a combination of basic scientific knowledge and manual skill which can be obtained through two years of post-high school education, such

as is offered in many technical institutes and junior colleges, or through equivalent on-the-job training

**Administrative Support** – Includes all clerical-type work regardless of difficulty, where the activities are predominantly non-manual

**Service/Maintenance** – Positions requiring manual labor to perform routine service tasks

**Occupational Distribution** – The occupational distribution examines how a particular group is distributed among occupations. Thus, if 20 officials and managers are Female and there are a total of 100 Females, the occupational distribution of Females as officials and managers is 20 percent  $((20/100)*100)$ .

**Race/Ethnicity** –

**White (Not of Hispanic Origin)** - All persons having origins in any of the original peoples of Europe, North Africa, or the Middle East

**Black (Not of Hispanic Origin)** - All persons having origins in any of the black racial groups of Africa

**Hispanic** - All persons of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race

**Asian/Pacific Islander** - All persons having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands. This area includes, for example, China, Japan, Korea, the Philippine Islands and Samoa

**Other** - All other ethnicities

**State and Local Government Job Groups** –See EEO Tabulation 2006-2010 (5-year ACS data); U.S. Census Bureau