

Trailblazer Joint Powers Board



Equal Employment Opportunity Policy (EEO Policy)

January 15, 2026

NOTE: This is an abbreviated EEO policy because the organization has fewer than 100 employees.

Trailblazer Joint Powers Board
EQUAL EMPLOYMENT OPPORTUNITY (EEO)
POLICY STATEMENT

Trailblazer Joint Powers Board, hereinafter referred to as Trailblazer, is an Equal Opportunity Employer (EOE). The premise of this designation is that every employee has the right to work in an environment free from all forms of discrimination.

Trailblazer is committed to equal opportunity employment for all persons regardless of race, color, religion, national origin, sex including sexual orientation or gender identity, age, disability, veteran status, or genetic information.

To demonstrate this commitment and to remain compliant with federal regulations, Trailblazer has developed an Equal Employment Opportunity (EEO) program that is outlined by this policy.

The responsibility for the implementation of the EEO program is assigned to the Executive Director. However, all management personnel share this responsibility and will be assigned specific tasks to ensure that Trailblazer accomplishes its objectives and remains in compliance.

Trailblazer's EEO Officer is Executive Director Gary Ludwig. The backup EEO Officer is Office Manager Erin Peters. The role of the EEO Officer is to serve as a check and balance on employment practices.

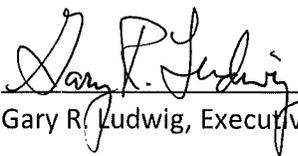
Employees and applicants have the right to file complaints alleging discrimination with the following employees at Trailblazer: Executive Director Gary Ludwig, Human Resource Manager Jocelyn Ziegler, and/or Office Manager Erin Peters. Retribution against an employee who files a complaint is strictly prohibited.

The overall performance of managers and supervisors will be evaluated partly on their contributions to the implementation and success of the EEO program, which at its core is intended to prevent discrimination. Trailblazer recognizes that achievement of EEO objectives may provide benefits to the organization through more development and productivity of potentially underutilized employees.

Trailblazer's EEO policy shall be distributed to all employees, board members, and any other individual or organization that requests a copy of the policy.

Employees or prospective employees who formally request a reasonable accommodation due to a disability will be accommodated in accordance with the law.

This page shall be posted on Trailblazer's official employee bulletin board.



Gary R. Ludwig, Executive Director

1/15/26
Date

PROCEDURE FOR DISSEMINATION OF POLICY

A. Internal Dissemination

1. The Policy Statement and other applicable nondiscrimination information will be permanently posted and conspicuously displayed in areas available to employees and applicants for employment including the official employee bulletin board and the employment section of Trailblazer's website.
2. The Equal Employment Opportunity Policy Statement will be communicated to employees in the same way that other major personnel policies or decisions are communicated to employees.
3. Trailblazer's Equal Employment Opportunity policies will be distributed as part of the employee handbook.
4. All executive, management, and supervisory personnel will be furnished a full copy of the Equal Employment Opportunity policy and any amendments.
6. Orientation and training sessions will be conducted to inform all employees about Trailblazer's commitment to the Equal Employment Opportunity policy and about an employee's individual responsibility to make effective use of the affirmative action plan.
7. Trailblazer will review the Equal Employment Opportunity policies with all employees including minorities, women, veterans, and individuals with disabilities.
8. Trailblazer will disseminate its Equal Employment Opportunity Policy Statement to all employees at least once per year.
9. Photographs of men, women, minorities, non-minorities, and individuals with disabilities shall be occasionally featured in advertising, employee materials, and similar publications (when use of photographs is applicable).

B. External Dissemination

1. Trailblazer will communicate its commitment to Equal Employment Opportunity to subcontractors and suppliers either verbally or in writing. Posting the policy on Trailblazer's website satisfies this requirement.
2. Trailblazer will notify all recruitment sources of its Equal Employment Opportunity policy and encourage those sources to actively recruit and refer minorities, women, veterans, and individuals with disabilities to assist Trailblazer in achieving its affirmative action objectives.
3. Trailblazer will notify all current or potential sources of workforce supply, including but not limited to subcontractors, employment agencies, schools, colleges, and news media, of Trailblazer's Equal Employment Opportunity policies.

4. Trailblazer will include the statement “Equal Opportunity Employer” on employment applications and in advertisements recruiting employees or vendors.
5. Trailblazer will communicate to prospective employees the existence and contents of Trailblazer’s Equal Employment Opportunity policy.
6. Trailblazer will post its Equal Employment Opportunity policy on its website.

DESIGNATION OF PERSONNEL RESPONSIBILITY

Trailblazer's Executive Director has been designated as the Equal Employment Opportunity Officer to monitor all employment related activities to ensure that Trailblazer's Equal Employment Opportunity policies are being carried out.

A. EEO Officer's Responsibilities

The EEO Officer's duties may include, but are not limited to, the following:

1. Developing and recommending EEO policy, a written EEO program, and internal and external communication procedures;
2. Assisting management in collecting and analyzing internal employment data, identifying problem areas, establishing objectives, and developing programs to achieve success;
3. Designing, implementing, and monitoring internal audit and reporting systems to measure program effectiveness and to determine where progress has been made and where further action is needed;
4. Reporting periodically to members of the Trailblazer Governing Board regarding any complaints and the overall progress of the organization's recruitment and retention (i.e. staffing levels).
5. Serving as liaison between Trailblazer, Federal, State, and local governments, regulatory agencies, organizations for minorities, women, and individuals with disabilities, and other related groups;
6. Assuring that current legal information affecting equal opportunity employment and affirmative action is disseminated to responsible individuals or officials;
7. Assisting in recruiting all individuals including minorities, women, veterans, and individuals with disabilities and establishing outreach sources for use by managers with hiring authority;
8. Ensuring that multiple individuals concur with all hires and promotions (e.g., at least two people are involved in interviewing and at least two people need to agree with hiring recommendations);
9. Processing employment discrimination complaints.

B. Responsibilities for Other Managers

Although the EEO Officer has the primary responsibility for implementing Trailblazer's EEO plan, all other managers are expected to carry out the following responsibilities:

1. Assisting in identifying problem areas and establishing objectives;

2. Being actively involved with A) local organizations for minorities, women, veterans, and individuals with disabilities, B) community action organizations, and C) community service programs designed to promote equal opportunity employment.
3. Participating actively in periodic reviews of all aspects of employment to identify and to remove barriers that obstruct the achievement of specified objectives;
4. Holding regular discussions with managers, supervisors, and employees to ensure that the organization's policies and procedures are being followed;
5. Reviewing the qualifications of all employees to ensure that minorities, women, veterans, and individuals with disabilities are given full opportunity for transfers, promotions, training, salary increases, and other forms of compensation;
6. Participating in the review and/or investigation of complaints alleging discrimination;
7. Conducting and supporting training and/or career development for all employees;
8. Participating in periodic reviews to ensure that the organization is compliant with its EEO policy.

NOTICE OF EQUAL EMPLOYMENT OPPORTUNITY OFFICER

January 15, 2026

The Equal Employment Opportunity (EEO) Officer for Trailblazer Joint Powers Board is the Executive Director. The backup EEO Officer is Office Manager Erin Peters. The EEO Officer will handle all complaints alleging discrimination on the basis of race, color, religion, national origin, sex including sexual orientation or gender identity, age, disability, veteran status, or genetic information, which does not prevent satisfactory performance of work.

Trailblazer Joint Powers Board will abide by the provisions of the Civil Rights Act of 1964 and Executive Order 11246 relating to Equal Employment Opportunity. Anyone who believes that he or she has been discriminated against should report the matter to Trailblazer's Executive Director, Office Manager, or Human Resource Manager.

Executive Director Gary Ludwig can be reached by calling 320-864-1000 or emailing gludwig@trailblazertransit.com.

Office Manager Erin Peters can be reached by calling 320-864-1000 or emailing epeters@trailblazertransit.com.

Human Resource Manager Jocelyn Ziegler can be reached by calling 320-864-1000 or emailing jziegler@trailblazertransit.com.

ASSESSMENT OF EMPLOYMENT PRACTICES

A. Job Posting and Applicant Recruitment

Comprehensive posting and recruitment procedures are necessary to ensure that persons applying for positions are qualified and reasonably reflect the community's population distribution.

Trailblazer gives first consideration for job openings to existing employees. This is accomplished through internal postings as well as through information provided to employees by managers and human resources. Please see Article 2 of Trailblazer's personnel policies titled **Job Announcements, Recruitment, and Selection** for more detailed information.

B. Selection Procedures

Trailblazer's selection procedures are designed to ensure non-discrimination with respect to hiring, transfers, and promotions. The procedures are specifically concerned with preventing selections based on stereotypical characterizations, preference of supervisors, co-workers or clients of the organization, and other non-merit factors such as marital status, disability, and so forth. Specific procedures have been designed to accomplish this objective including the following:

- 1) **Pool of Candidates:** A pool of candidates shall be created through a comprehensive posting and recruitment process. Current employees and the general public are informed of employment opportunities at www.trailblazertransit.com. Positions are also posted on job websites and potentially in local newspapers and other print material.
- 2) **Application Forms:** Application forms have been designed to evaluate job-related criteria. These applications allow for considerable self-evaluation of the job skill level of the applicant. The completion of the application form is also used in the selection process. Specifically, applications, including but not limited to cover letters, are evaluated for content, completeness, etc.
- 3) **Testing Instruments:** Such testing includes written skills tests for office staff. Driver applicants are also required to pass an in-house behind-the-wheel road test.
- 4) **Interviewing:** Trailblazer determines interviews based on the applicant's Training and Experience Rating, which is calculated based on specific information provided by the applicant during the application process. The Training and Experience Rating takes into consideration state Veteran's Preference Laws that government organizations in Minnesota are required to follow. Two Trailblazer managers conduct all interviews by asking questions and documenting the responses. The interview questions are determined prior to the interview and are consistent between applicants. The exception to this would be for follow-up questions related to specific answers provided by the applicants during the interviews. Multiple interviews are common for positions that require higher-level skills.

5) **Nepotism:** Relatives of Trailblazer employees will not be employed, promoted, or engaged to perform services where one relative will or may exercise or directly/indirectly influence the recruitment, employment, salary, fees, or performance review of another relative. For purpose of this policy, the phrase “relatives” means an employee’s spouse, parents, children, siblings, stepparents, step and half-siblings, stepchildren, grandparents, grandchildren, parents-in-law, daughters-in-law, and sons-in-law.

6) **Conditional Job Offers:** After the interview committee determines that an applicant is suitable for a position and the best match for the position out of the batch of applicants that were interviewed, the Human Resource Manager makes a conditional job offer to the desired applicant. Conditions of employment may include a criminal background check, prior-employment reference checks, personal reference checks, driving record check, commercial driver’s license, DOT physical, pre-employment drug test, and passing an in-house road test. The specific conditions of any job offer will vary depending on the position, but the conditional job offer for each unique position description will have the same conditions. Conditional job offers help ensure that applicants are properly qualified for their positions prior to hire.

7) **Probationary Period:** Once hired, the one-year probationary period is used as an additional mechanism to examine the suitability of the employee for the available position.

C. General Personnel Policies and Procedures

1. Wage and Salary Administration

Trailblazer’s wage and salary administration program is designed to allow for the administration of a fair and equitable compensation system. Its goals are to:

- A) Match job descriptions with actual job duties.
- B) Determine compensation parity between jobs of equal responsibility requiring comparable skills.
- C) Prepare in-depth position descriptions covering:
 - a. Purpose and scope of job (general summary)
 - b. Duties and responsibilities (details)
 - c. Supervision exercised
 - d. Supervision received
 - e. Minimum qualifications (education, experience and other skills)
- D) Assure that the practices of compensation are fair, equitable, and conform to Trailblazer’s EEO Policy and applicable state and federal law.

Trailblazer Joint Powers Board has reviewed the wage and salary program as it relates to the following:

- 1) Current positions/job classifications have been reviewed to encourage career growth.

- 2) Employees are encouraged to apply for positions for which they are interested and deem themselves qualified.
- 3) The compensation level for different positions reflects equity in reference to degrees of responsibility and qualifications.

2. Benefits and Time Off for Illnesses

All employee benefits are administered according to Trailblazer's EEO policy and in conformance with state and federal laws and regulations governing EEO.

Trailblazer treats all medical conditions affecting an employee in the same manner, including pregnancy-related conditions.

Paid time off for employee illnesses is granted to employees in accordance with Trailblazer's Paid Time Off policy for both hourly and salaried employees. See Article 11 of the Trailblazer's personnel policies titled **Paid Time Off** for more detailed information. Unpaid time off for illnesses may also be available under certain circumstances such as Family Medical Leave (federal). See Article 13 of Trailblazer's personnel policies titled **Family Medical Leave Act** for more detailed information.

No medical condition shall require a mandatory leave unless:

- 1) Proper medical authorities indicate it would have a negative impact on job performance.
- 2) An evaluation indicates the medical condition would result in the inability to properly perform the duties of the position.
- 3) A reasonable accommodation as defined by the Americans with Disabilities Act (ADA) would pose an undue hardship.

Additionally, Trailblazer administers a fair and equitable retirement program in conformance with applicable state and federal laws. As a government entity in Minnesota, Trailblazer employees participate in the Public Employees Retirement Association (PERA) pension plan.

3. Employee Development and Training

Trailblazer recognizes its responsibility to train and develop its employees. Furthermore, Trailblazer shares the responsibility with employees for developing their promotion potential and recognizes that development for employees takes place in a growth-oriented environment of understanding and respect for every individual's uniqueness.

Successful employee development is based on the following:

- The employee's basic aptitude, abilities, and core skills;

- The employee's willingness to participate in self-development;
- Management's commitment and ability to assess employee skill level and to develop employee potential for promotion through mentorship and the use of available training opportunities;
- The quantity and quality of career development resources available.

The Human Resource Manager is available to provide information to employees regarding Trailblazer's position descriptions and requirements. Potential career growth and educational information is available to all interested employees.

The following procedures have been implemented to enhance the equitable handling of training opportunities for all individuals employed by Trailblazer.

- The administration shall promote appropriate and applicable training opportunities to enhance an employee's ability to qualify for positions as they become available.
- All information about training opportunities shall be made available upon employee request.

4. Employee Performance and Evaluation

A major failure of many performance evaluation systems is that valuable feedback is withheld until a specific time when a formal evaluation is conducted. In most organizations, formal performance evaluations are typically conducted once per year. Trailblazer believes that the traditional performance evaluation process is antiquated, insufficient, and unacceptable. Instead of fostering a positive work environment where timely constructive feedback can make valuable difference, employees and their supervisors tend to dread traditional annual reviews that are often rushed and poorly executed just because they are required to be completed. The stress and distraction caused by traditional annual performance reviews often make them counterproductive for all parties and often can lead to serious problems with employee productivity and morale. Instead, Trailblazer implements a modern perspective on the performance evaluation process that is much better suited to achieve the desired outcomes of the organization and the employees.

Specifically, Trailblazer practices a Continuous Employee Performance Evaluation process, meaning that managers and supervisors are expected to provide timely feedback to employees on a frequent basis. Such feedback should include reinforcement of positive work performance in equal or greater amounts than any constructive criticism. If there is absolutely no positive work performance to recognize, then the manager or supervisor should be actively evaluating whether or not the individual merits continued employment. With respect to any performance that is unsatisfactory, a manager or supervisor is expected to give timely feedback to the employee, as well as any training or resources needed for the employee to improve. This is critical for the organization's success, the employee's development, and the overall performance of the entire team. Unacceptable or undesirable

performance that is communicated to the employee must be documented either by the supervisor or the Human Resource Manager. Furthermore, Trailblazer must provide an employee with written notice of any formal disciplinary action issued.

Annual step increases at Trailblazer are performance-based, which means that wage increases on the salary schedule are subject to good performance. An employee who receives disciplinary action within any given calendar year or an employee who continues to fall short of clearly stated performance expectations shall not be granted a step increase. Managers and supervisors are responsible to communicate performance concerns in a timely fashion, so employees who do not know that they are underperforming may still be eligible for a step increase.

Trailblazer managers are required to meet annually with employees near the end of each calendar year to summarize the decision to either award a step increase or to deny a step increase. Although employees should already have a good indication if they will be receiving a step increase or not, this meeting serves as an opportunity to erase any questions about the matter.

Subsequently, the annual step determination meeting essentially becomes a discussion that reinforces positive work performance. This meeting also serves as motivation for underperforming employees to perform well or to allow a manager to reinforce the message that employment may not continue if performance does not improve. Since the annual meeting is a review of prior feedback provided throughout the year, employees should already know the content of the meeting with respect to both positive feedback and constructive criticism. Trailblazer shall consider it a performance issue for the manager or supervisor if an employee hears anything substantially new about unsatisfactory performance during the annual meeting, unless such undesirable performance occurred shortly before the annual meeting.

5. Disciplinary Action

Disciplinary action will be imposed consistently and equitably for the purpose of correcting deficiencies. Please see Article 8 of Trailblazer's personnel policies titled **Discipline** and Article 9 titled **Grievance Procedures** for more detailed information.

6. Discrimination and Harassment Complaint Procedures

Any Trailblazer employee or applicant who feels he/she has been discriminated against because of race, color, religion, national origin, sex including sexual orientation or gender identity, age, disability, veteran status, or genetic information has the right to register a complaint in accordance with Trailblazer policy. The primary purpose of the discrimination and harassment complaint procedures is to determine whether discrimination has occurred and, if confirmed, take appropriate action to correct the situation.

For the details about the complaint process, please see Article 17 of Trailblazer's personnel policies titled **Respectful Workplace Policy and Policy Against Harassment** for more detailed information.

MONITORING AND REPORTING

1. Purpose of Monitoring and Reporting

Trailblazer has established an internal monitoring and reporting system for its Equal Employment Opportunity (EEO) program. The purpose of this reporting system is to:

- a. Assess accomplishments and establish/enforce a system of accountability.
- b. Evaluate the EEO program and to make any appropriate adjustments or to take any necessary corrective action.
- c. Identify areas in which EEO objectives or the implementation has not been accomplished.
- d. Provide a precise and factual database for future projections and compliance reviews.

Internal employment data will be collected and reviewed by Trailblazer's administrative team on an annual basis. To monitor the status of Trailblazer's Equal Employment Opportunity program, the following quantitative and qualitative measures shall be analyzed and compared to previous years. For the purposes of this EEO policy, population group includes minority status, gender, veteran status, and disability status.

- a. Number of open positions posted (e.g. number of people that Trailblazer attempted to hire).
- b. Number of applicants offered employment for each open position, by population group.
- c. Number of applications from existing employees for open positions (employees requesting a promotion, transfer, or demotion), by population group.
- d. Number and percent of open positions filled by existing employees (employees requesting a promotion, transfer, or demotion), by population group.
- e. Number and percent of open positions filled by new employees, by population group.
- f. Number and percent of all hires completing probationary period, by population group.
- g. Number and percent of grievances based on charges of discrimination filed and/or upheld, by population group.
- h. Number and percent of persons terminated, by population group.