



Cesar A. Perez, Esq.
Chair

September 13, 2012

Angela Cabrera
Malini Cadambi Daniel
Elaine S. Reiss, Esq.
Arva R. Rice
Commissioners

Mark Davies
Executive Director
Conflicts of Interest Board
2 Lafayette Street, Suite 1010
New York, NY 10001

Charise L. Hendricks, PHR
Interim Executive Director

Judith Garcia Quiñonez, Esq.
Agency Counsel

253 Broadway
Suite 602
New York, NY 10007

Re: **Resolution #12/19- 312C:** Implementation of Corrective Actions Pursuant to the Audit of Compliance by the Conflicts of Interest Board (COIB) with its Equal Employment Opportunity Policy (EEOP)

212. 615. 8951 tel.
212. 615. 8931 fax

Dear Mr. Davies:

On behalf of the members of the Equal Employment Practices Commission (EEPC), I want to thank you for your August 20, 2012 response to the EEPC's Preliminary Determination pursuant to the audit of the Conflicts of Interest Board's (COIB) Equal Employment Opportunity Program.

Pursuant to Section 832 of Chapter 36 of the New York City Charter, the EEPC was required to consider the COIB's response to the preliminary determination, and determine whether the corrective actions taken by the agency are sufficient to remedy non-compliance identified in the preliminary determination. The COIB submitted its response to the EEPC's preliminary determination with accompanying documentation of actions taken to rectify the non-compliance identified in the preliminary determination.

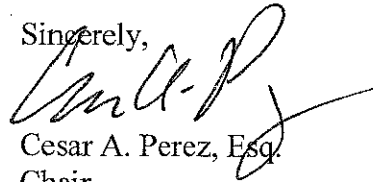
In addition, in response to the EEPC's request pursuant to Section 815.a.(19) of the New York City Charter, the COIB submitted a copy of your memorandum informing your staff of the corrective actions your office has implemented in response to the EEPC's audit.

The EEPC considered the COIB's response and concluded that the COIB implemented all recommended corrective actions pursuant to our audit of compliance by your agency with the City's Equal Employment Opportunity Policy from January 2, 2009 to December 31, 2011.

This Commission has determined that the COIB has implemented the recommended corrective actions as required by Chapters 35 and 36 of the New York City Charter to the Commission's satisfaction. The Conflicts of Interest Board is now in compliance with the requirements of the City's Equal Employment Opportunity Policy and the EEPC's Equal Employment Opportunity Standards for Small City Agencies, which have a permanent headcount of 150 or less employees.

On behalf of this Commission, I want to thank you and EEO Officer, Sung Mo Kim for the cooperation extended to the EEPC.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cesar A. Perez', written over the word 'Sincerely,'.

Cesar A. Perez, Esq.
Chair

C: Sung Mo Kim, EEO Officer, COIB

**EQUAL EMPLOYMENT PRACTICES COMMISSION
CITY OF NEW YORK**

RESOLUTION #12/19-312C: Determination of implementation by the Conflicts of Interest Board of the recommended corrective actions made by the Equal Employment Practices Commission pursuant to its audit of the Conflicts of Interest Board's compliance with the Citywide Equal Employment Opportunity Policy from January 1, 2009 to December 31, 2011.

Whereas, pursuant to Chapter 36, Section 831(d)(2) and (5) of the New York City Charter, the Equal Employment Practices Commission is authorized to audit and evaluate the employment practices, programs, policies, and procedures of city agencies and their efforts to ensure fair and effective equal employment opportunity for minority group members and women, and to make recommendations to city agencies to insure equal employment opportunity for minority group members and women; and

Whereas, pursuant to Chapter 35, Section 814(a) (12) of the New York City Charter, the City established the Citywide Equal Employment Opportunity Policy, a set of uniform standards and procedures designed to insure equality of opportunity for municipal government employees and job applicants, and, consistent with federal, state and local laws, identified other groups for protection from discrimination in employment; and

Whereas, pursuant to its audit of the Conflicts of Interest Board (COIB), the Equal Employment Practices Commission (EEPC) issued a preliminary determination letter, dated July 26, 2012, setting forth its findings and recommended corrective actions; and

Whereas, the COIB submitted its response to the EEPC's preliminary determination letter, on August 30, 2012; and

Whereas, in accordance with Chapter 36, Section 832 (c) of the City Charter, the EEPC was required to consider the COIB's response to the preliminary determination, and determine whether the corrective actions taken by the agency are sufficient to remedy non-compliance identified in the preliminary determination; and

Whereas, the Conflicts of Interest Board submitted with its response to the preliminary determination documentation of actions taken to rectify the non-compliance identified in the preliminary determination; and

Whereas, at the EEPC's request, pursuant to Section 815.a.(19) of the New York City Charter, the COIB submitted a copy of the agency head's memorandum to staff, which outlined the corrective actions implemented in response to the EEPC's audit; and

Whereas, all of the aforementioned recommended corrective actions are required by, or are consistent with, the City's Equal Employment Opportunity Policy; and

Whereas, the members of this Commission have determined that the aforementioned recommendations have been implemented to the Commission's satisfaction. Now Therefore,

Be It Resolved,

that the Conflicts of Interest Board has implemented the recommended corrective actions deemed necessary to ensure compliance with equal employment opportunity pursuant to the requirements of Chapters 35 and 36 of the City Charter.

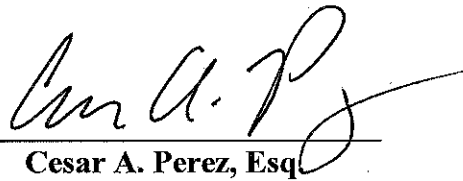
Be It Finally Resolved,

that the Commission authorizes the Chair, Cesar A. Perez, Esq., to forward a letter to the Executive Director of the Conflicts of Interest Board, Mark Davies, formally informing him that the COIB has implemented the recommended corrective actions to the Commission's satisfaction.

Approved unanimously on September 13, 2012.

**Angela Cabrera
Commissioner**

**Malini Cadambi Daniel
Commissioner**



**Cesar A. Perez, Esq.
Chair**