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BY MAIL AND EMAIL

October 5, 2018

Steven Banks
Commissioner
Department of Social Services
150 Greenwich Street
New York, NY 10007

Re: Preliminary Determination for Audit: Review, Evaluation and Monitoring of the Department of Social Services' (Human Resources Administration and Department of Homeless Services) Sexual Harassment Prevention and Response Practices January 1, 2016 to December 31, 2017.

Dear Commissioner Banks:

On behalf of the members of the Equal Employment Practices Commission (Commission or EEPC), thank you and your agency for the cooperation extended to our staff during the course of this audit. This letter contains the Commission's findings and preliminary determinations pursuant to our audit and analysis of your agency's sexual harassment prevention and response practices for the period covering January 1, 2016 to December 31, 2017.

Chapter 36, Section 831(d)(5) of the New York City Charter empowers this Commission to audit and evaluate the employment practices and procedures of city agencies and their efforts to ensure fair and effective equal employment opportunity for women and minority employees and applicants seeking employment. Sections 831(d)(2) and 832(c) authorize this Commission to make a determination that any agency's plan, program, procedure, approach, measure or standard does not provide equal employment opportunity, require appropriate corrective action and monitor the implementation of the corrective action it prescribes.

The Department of Social Services, which may herein be referred to as "the agency," falls within the Commission's purview under Chapter 36, Section 831(a) of the New York City Charter, which delineates city agency as any "city, county, borough or other office, administration, board, department, division, commission, bureau, corporation, authority, or other agency of government where the majority of the board members of such agency are appointed by the mayor or serve by virtue of being city officers or the expenses of which are paid in whole or in part from the city treasury..."



The purpose of this audit and analysis is to evaluate the agency's sexual harassment prevention and response practices, not to issue findings of discrimination pursuant to the New York City Human Rights Law. This Commission has adopted *Uniform Standards for EEPC Audits*¹ and *Minimum Equal Employment Opportunity Standards for Community Boards* to assess agencies' EEO programs and policies for compliance with federal, state and local laws, regulations, policies and procedures that are designed to increase equality of opportunity for municipal government employees and job applicants. These standards are founded upon and consistent with federal, state and local laws, regulations, procedures and policies including, but not limited to, the Citywide Equal Employment Opportunity Policy - Standards and Procedures to be Utilized by City Agencies; the New York City Human Rights Law (NYC Administrative Code §§8-107(1)(a) and (d), 8-107.13, and 8-107.1); the New York State Civil Service Law §55-a; and the equal employment opportunity requirements of the New York City Charter. Prescribed corrective actions are consistent with the aforementioned parameters.

Since this Commission is empowered to review and recommend actions that each agency should consider including in its annual plan of measures and programs to provide equal employment opportunity (Annual EEO Plan), the audited agency should incorporate required corrective actions in its current EEO Program and prospective Annual EEO Plans.

Scope and Methodology

This Commission's audit methodology includes the collection and analysis of the documents, records and data the agency provides in response to the document and information request; responses to the *EEPC Preliminary Interview Questionnaires* (PIQs) for EEO professionals and others involved in EEO program administration; and, if applicable, review of the agency's *Annual EEO Plans*, *Quarterly EEO Reports* and analysis of *Citywide Equal Employment Database System* (CEEDS) reports.

EEO professionals (including, but not limited to, past or current EEO Officers, Deputy or Co-EEO Officers, EEO Counselors, EEO Trainers, EEO Investigators, Disability Rights Coordinators, Career Counselors, and 55-a Program Coordinators) and others involved in EEO program administration such as the Principal Human Resources Professional are given a three-week deadline to complete and return their individual questionnaires. The Commission's EEO Program Analysts also conduct additional research and follow-up discussions or interviews with EEO professionals, when appropriate.

Description of the Agency

In 2016, the Department of Social Services (DSS) was formed out of the integration of the administrative units of the Human Resources Administration (HRA) and the Department of Homeless Services (DHS), and includes shared legal and EEO services, and shared EEO policies,

¹ Corresponding audit/analysis standards are numbered throughout the document.

procedures and training.² *“Through integrated management for the Human Resources Administration and the Department of Homeless Services, client services can be provided more seamlessly and effectively. The City leverages shared services functions across agencies, which results in better day-to-day management and building an integrated mission across agencies.”*³ The Human Resources Administration is dedicated to fighting poverty and income inequality by helping over 3 million New Yorkers in need through the administration of more than 12 major public assistance programs.⁴ The Department of Homeless Services has been tasked with overcoming homelessness in New York City.⁵ The CEEDS Reports: *Work Force Composition Summary*, attached as Appendices 1 and 2, indicated that the agency’s headcount was 15,478 employees (13,121 employed by Human Resources Administration and 2,357 employed by the Department of Homeless Services) at the end of the period in review.

PRELIMINARY DETERMINATIONS AFTER AUDIT AND ANALYSIS

Following are the corresponding audit standards for each subject area along with the EEPC’s findings and required corrective actions, where appropriate:

I. ISSUANCE, DISTRIBUTION AND POSTING OF EEO POLICIES:

Determination: The agency is in compliance with the standards for this subject area.

1. Issue a Policy Statement or memorandum reiterating commitment to the prevention of sexual harassment annually.
- ✓ In 2016, the HRA’s *Commitment to Equal Employment Opportunity and Diversity and Inclusion* Policy Statement was included in the Human Resources Administration/Department of Social Services *Equal Employment Opportunity Policy Manual 2016* (EEO Policy Manual 2016), attached as Appendix 3. The HRA EEO Policy Manual 2016 informed all employees that, “[t]he policies and procedures set forth in this manual constitute the Equal Employment Opportunity (“EEO”) Policy of the Human Resources Administration (“HRA”) of the City of New York. This EEO Policy is consistent with the Federal, State and local laws and New York Citywide EEO Policies that prohibit discrimination, [and] harassment, including sexual harassment ... The implementation of the Agency’s EEO Policy is one of HRA’s highest priorities and has [the agency head’s] full commitment and support”. The agency also reported that at all EEO trainings conducted during the period in review, employees were informed that the EEO policies, policy statements, forms, and EEO Policy Manual were available to view and download from the agency’s intranet. In October 2017, the agency head emailed all employees a link to the annual EEO Policy Statement entitled, *DSS’ Commitment Statement to Equal Employment Opportunity, Diversity and Inclusion* (2017 EEO Policy Statement). The

² New York State Office of the State Comptroller, *Oversight of Selected Fiscal Aspects of Homeless Shelter Services Report 2016-N-1*, October 2017, <https://osc.state.ny.us/audits/allaudits/093018/16n1.pdf>

³ “About DSS” NYC Department of Social Services, City of New York, 2018, <https://www1.nyc.gov/site/dss/about/about.page>

⁴ “About the Human Resources Administration” NYC Human Resources Administration, City of New York, 2018, <https://www1.nyc.gov/site/hra/about/about-hra.page>

⁵ “Inside DHS” NYC Department of Homeless Services, City of New York, 2018, <https://www1.nyc.gov/site/dhs/about/inside-dhs.page>

2017 EEO Policy Statement said, “[t]he policies and procedures set forth in the New York City Equal Employment Opportunity Policy is the “EEO” Policy of the Department of Social Services (DSS), the Human Resources Administration (HRA) and the Department of Homeless Services (DHS) of the City of New York. This EEO Policy is consistent with the Federal, State and local laws and New York Citywide EEO Policies that prohibit discrimination, harassment, including sexual harassment ...The implementation of the City’s EEO Policy is one of [the agency’s] highest priorities and has [the agency head’s] full commitment and support.” In December 2017, the agency head emailed all employees a link to the DSS-HRA-DHS Sexual Harassment Policy (Sexual Harassment Policy) which reiterated, “[a]ll Department of Social Services-Human Resources Administration-Department of Homeless Services (DSS-HRA-DHS) employees should familiarize themselves with the guidelines in this policy statement so that they will understand what type of conduct is prohibited and know the remedies available to anyone who has experienced sexual harassment.”

NOTE: Subsequent to period in review, screenshots of the agency’s intranet site demonstrated that links labeled *EEO Policy Manual 2016* and *Message from Commissioner Banks* were posted to the intranet site.

2. Distribute/Post a paper or electronic copy of the *Equal Employment Opportunity Policy, Standards and Procedures to Be Utilized by City Agencies* – or an agency Policy that conforms to city, state and federal laws against sexual harassment– for use by managers, supervisors, and legal, human resources and EEO professionals. Include, or attach as addenda: uniform and responsive procedures for investigating discrimination/sexual harassment complaints, and current contact information for the agency’s EEO professionals as well as federal, state and local agencies that enforce laws against discrimination/sexual harassment.
- ✓ The May 2016 *HRA Equal Employment Opportunity Policy* (agency’s EEO Policy), attached as Appendix 4, and *Revision of the EEO Complaint and Investigation Procedures* (agency’s EEO Complaint Investigation Procedures), attached as Appendix 5, were established by the agency as its policies and procedures and included uniform and responsive procedures for investigating discrimination/sexual harassment complaints. The agency’s EEO Policy contained links to the City of New York’s 2014 *Equal Employment Opportunity Policy, Standards and Procedures to Be Utilized by City Agencies* (City’s EEO Policy), and City of New York’s *About EEO: What You May Not Know* (City’s EEO Policy Handbook). The agency’s EEO Complaint Investigation Procedures contained contact information (telephone number, address and web address) for the federal, state and local agencies that enforce laws against discrimination.

In October 2017, the agency head emailed all employees a link to the 2017 EEO Policy Statement that said, “[t]he policies and procedures set forth in the New York City Equal Employment Opportunity Policy is the “EEO” Policy of the Department of Social Services (DSS), the Human Resources Administration (HRA) and the Department of Homeless Services (DHS) of the City of New York.” The City’s EEO Policy conformed to city, state and federal laws against sexual harassment—for use by managers, supervisors, and legal, human resources and EEO professionals—and included uniform and responsive procedures for investigating

discrimination/sexual harassment complaints. The agency adopted by reference the City's EEO Policy, the City of New York's 2016, *EEO Complaint Procedural Guidelines* (City's EEO Complaint Investigation Procedures), which contained uniform and responsive procedures for investigating discrimination/sexual harassment complaints, and contact information for the federal, state and local agencies that enforce laws against discrimination/sexual harassment.

On December 7, 2017, the agency head emailed all employees a link to the Sexual Harassment Policy (see §I.1). The telephone numbers and addresses for the agency's two (2) EEO Office locations were included in the Sexual Harassment Policy and the agency head's December 2017 email distribution. The Sexual Harassment Policy hyperlinked to the agency's EEO Complaint Investigation Procedures. The agency also reported that the agency's EEO Complaint Investigation Procedures, the agency's EEO Policy, the City's EEO Policy and the City's EEO Policy Handbook, were distributed to new employees during orientation and posted on its EEO intranet page for the duration of the audit period. In addition, the agency's EEO Policy Manual 2016 provided further information about EEO and complaint investigation procedures.

NOTE: The address listed for the New York City Commission on Human Rights in the City's EEO Policy Handbook is inaccurate. If the agency chooses to distribute the City's EEO Policy Handbook, it should include an updated address for the New York City Commission on Human Rights with that distribution.

II. EEO TRAINING FOR AGENCY:

Determination: The agency is in partial compliance with the standards for this subject area.

3. Establish and implement a training plan for new and existing employees to ensure that all individuals who work within the agency, including managers and supervisors, receive training on the prevention of sexual harassment as well as discrimination complaint and investigation procedures.
- ✓ During the period in review, HRA and DHS separately established and reported on EEO and sexual harassment training plans for their workforces.

HRA's training plan as outlined in its fiscal year 2016 and 2017 *Annual Diversity and Equal Employment Opportunity Plans* indicated that 10,825 employees were to be trained in EEO via Department of Citywide Administrative Services' (DCAS) Citywide Training Center (CTC) computer-based training (CBT) and agency classroom trainings. DCAS CTC training completion reports and HRA sign-in sheets indicated that 6,346 employees (approximately 48% of the HRA workforce) completed the aforementioned EEO trainings. PowerPoint slides from the aforementioned trainings included the prevention of sexual harassment and discrimination complaint and investigation procedures.

DHS's fiscal year 2016 and 2017 *Annual Diversity and Equal Employment Opportunity Plans* established training plans that indicated 450 employees were to be trained via DHS classroom EEO training. Sign-in sheets documented that 440 employees (approximately 19% of the DHS

workforce) completed EEO training. PowerPoint slides from the DHS EEO training demonstrated that the topics of the training included the prevention of sexual harassment and discrimination complaint and investigation procedures.

The agency's fiscal year 2018 *Annual Diversity and Equal Employment Opportunity Plan* established that 1,875 employees (approximately 12% of the agency's workforce) were to complete the DCAS CTC's EEO training and 2,000 employees (approximately 13% of the agency's workforce) were to complete DCAS CTC's sexual harassment training.

- The training plan established by the agency did not ensure that all new and existing employees received training on the prevention of sexual harassment as well as discrimination complaint and investigation procedures. Corrective Action Required.

Corrective Action 1: Establish and implement a training plan for new and existing employees to ensure that all individuals who work within the agency, including managers and supervisors, receive training on the prevention of sexual harassment as well as discrimination complaint and investigation procedures.

III. COMPLAINT & INVESTIGATION PROCEDURES

Summary of Complaint Activity: The complaint activity from the period in review for the Human Resources Administration (HRA) and the Department of Homeless Services (DHS) were reported separately.

HRA reported a total of **455** internal and **97** external complaints⁶ were filed during the period in review. In response to the EEPC's request, HRA submitted its last five, completed, internal EEO complaint files, complaint Nos. 17-109C, 18-002C, 18-004C, 18-012C and 18-013C.

DHS reported a total of **43** internal and **82** external complaints⁷ were filed during the period in review. In response to the EEPC's request, DHS submitted its last five, completed, internal EEO complaint files, complaint Nos. 17-00010, 17-00011, 17-00012, 17-00013 and 17-00014.

The following findings are based on the examination of these complaint files and documents and forms submitted; wherever applicable, the agency's policies and procedures were used to measure compliance with the standard.

Determination: The agency is in partial compliance with the standards for this subject area.

4. Include in the complaint file a completed Complaint Intake Form, or a written complaint that captures facts (including pertinent dates) that identify the respondent(s) with reasonable specificity and provide the essence of the circumstances which gave rise to the complaint.

⁶ 47 of the 552 total complaints (approximately 8.5%) were based on claims of sexual harassment.

⁷ 19 of the 125 total complaints (approximately 15.2%) were based on claims of sexual harassment.

- ✓ Each EEO complaint file submitted (Nos. 17-109C, 18-002C, 18-004C, 18-012C, 18-013C, 17-00010, 17-00011, 17-00012, 17-00013 and 17-00014) included either a completed complaint intake form or a written complaint that captured the facts (including pertinent dates) that identified the respondent(s) and provided the essence of the circumstances which gave rise to the complaint.

The agency's *EEO Complaint Form*, accessible to all employees via the agency's intranet site, stated, "[a]ll DSS-HRA-DHS staff, clients, job applicants, and employment and training program participants should use this form to file an EEO complaint with DSS-HRA-DHS's EEO Office". The agency's *EEO Complaint Form* provided space to capture facts (including pertinent dates) to identify the respondent(s) with reasonable specificity and provide the essence of the circumstances which gave rise to the complaint.

5. Provide the option to file a complaint anonymously.

- ✓ Section V of the agency's EEO Complaint Investigation Procedures provided the option to file a complaint anonymously, by stating, "[i]ndividuals who wish to discuss a potential EEO issue without revealing their identity may do so by telephoning or writing to the EEO Office. Where necessary, communication may also be made through TTY, relay service or other alternate means. In such cases, the EEO Office will provide counseling and take such follow-up action as may be appropriate and possible, given the restraints of anonymity."

6. Serve the respondent with a notice of the complaint that includes the respondent's right to respond to the allegations and right to be accompanied by a representative of his/her choice. Maintain in the complaint file documentation regarding the service of notice on the respondent.

- ✓ The respondents to EEO complaints Nos. 17-109C, 18-002C, 18-004C, 18-012C, 18-013C, 17-00010 and 17-00012 were each served with a notice of the complaint that included their right to respond to the allegations and to be accompanied by a representative of his/her choice. Copies of the notices to respondents were maintained in the respective EEO complaint files.

- EEO complaint files Nos. 17-00011, 17-00013 and 17-00014 did not contain a notice of the complaint to the respondent(s). Corrective Action Required.

Corrective Action 2: Serve the respondent with a notice of the complaint that includes the respondent's right to respond to the allegations and right to be accompanied by a representative of his/her choice. Maintain in the complaint file documentation regarding the service of notice on the respondent.

7. Issue/maintain written confirmation when an internal complaint/mediation is terminated, withdrawn or resolved by agreement of the parties or EEO Office.

- ✓ Because none of the EEO complaint files submitted (Nos. 17-109C, 18-002C, 18-004C, 18-012C, 18-013C, 17-00010, 17-00011, 17-00012, 17-00013 and 17-00014) were terminated, withdrawn or resolved by agreement of the parties or EEO Office; the agency's EEO Policy Manual 2016 and the agency's EEO Complaint Investigation Procedures were used to measure compliance with this standard. The agency's EEO Policy Manual 2016 notified employees that "[t]he EEO Officer shall notify the complainant in writing about the determination of the request to withdraw the complaint. If the determination is to accept withdrawal of the complaint, the EEO Officer shall notify the relevant parties that the investigation has been terminated." Section XI of the agency's EEO Complaint Investigation Procedures set forth the following requirements that "... the EEO Office shall notify the parties in writing that the complainant has withdrawn the complaint. The EEO Office shall notify the parties whether the investigation has been terminated or is continuing." The agency's EEO Policy Manual 2016 further indicated that "[w]hen a resolution is agreed upon, the complainant and respondent, and any other necessary party, must sign a Mediation Resolution Agreement ... When a resolution is not agreed upon and/or the mediator and/or the EEO Office determine that further mediation efforts would be unproductive, the parties will receive a written notice confirming termination of mediation." In addition, Section VIII of the agency's EEO Complaint Investigation Procedures stated, "[t]he EEO Office will advise all parties in writing of the outcome of the complaint."
- 8. Take thorough notes, of words spoken and facts provided, during each interview. Include these notes in each complaint file.
- ✓ Each EEO complaint file submitted (Nos. 17-109C, 18-002C, 18-004C, 18-012C, 18-013C, 17-00010, 17-00011, 17-00012, 17-00013 and 17-00014) contained thorough notes of words spoken and facts provided during each interview.
- 9. Issue a conclusive report within 90 days of the date the complaint was filed. Commence an investigation immediately if allegations raised sufficiently warrant an investigation.
- ✓ Conclusive confidential reports for EEO complaint Nos. 17-109C, 17-00010, 17-00013 and 17-00014 were issued within 90 days of the date the complaint was filed.
 - Conclusive confidential reports for EEO complaint Nos. 18-002C, 18-004C, 18-012C, 18-013C, 17-00011 and 17-00012 were not issued within 90 days of the date the complaint was filed (but in 135, 127, 129, 116, 119 and 114 days, respectively). Corrective Action Required.
- Corrective Action 3:** Issue a conclusive report within 90 days of the date the complaint was filed. Commence an investigation immediately if allegations raised sufficiently warrant an investigation.
- 10. In rare circumstances where a complaint investigation cannot commence immediately, or where a conclusive report cannot be issued within 90 days, specify in the complaint file the

reason for the delay and project a time frame for completion of the report. Notify the complainant and respondent of the delay.

- ✓ EEO complaint files Nos. 18-002C, 18-004C, 18-012C and 18-013C contained notices of delay to the complainant and respondent that specified an estimated timeframe for the completion of the report and reason for delay.
- EEO complaint files Nos. 17-00011 and 17-00012 did not contain notices to the respondent or complainant. The complaint files did not include the reason for the delay or a projected timeframe for the completion of the report. Corrective Action Required.

Corrective Action 4: In rare circumstances where a complaint investigation cannot commence immediately, or where a conclusive report cannot be issued within 90 days, specify in the complaint file the reason for the delay and project a time frame for completion of the report. Notify the complainant and respondent of the delay.

11. Generate at the end of each complaint investigation, a conclusive confidential report which includes a summary of the allegations and responses, a summary of the procedural history of the investigation, a statement of the relevant facts gathered, a determination, a recommendation and documentation of the Agency Head's Review.
- ✓ Each complaint file submitted (Nos. 17-109C, 18-002C, 18-012C, 18-013C 18-004C, 17-00010, 17-00011, 17-00012, 17-00013 and 17-00014) contained a conclusive confidential report, which included a summary of the allegations and responses, a summary of the procedural history of the investigation, a statement of the relevant facts gathered, a determination, and a recommendation.

NOTE: The aforementioned EEO complaint files did not contain documentation of the Agency Head's Review of the conclusive confidential reports within the audit period (see §III.13 for associated corrective action).

12. Maintain complaint files in a secure area and ensure that they can be located and reviewed by the agency head, agency general counsel, and other appropriate staff identified by the agency head.
- ✓ During the period in review, HRA and DHS maintained two physical EEO office locations. The agency reported that its complaint files were secured at its EEO office locations, that access to complaint files was restricted to EEO staff and that the compliant files were made available to the agency head and the agency's general counsel upon request.
13. Establish and implement a policy whereby the agency head (or an approved direct report other than the General Counsel) reviews the principal investigator's conclusive report; issues a written/electronic determination adopting, rejecting, or modifying the recommended action; and signs each determination, via writing or electronically, to indicate it has been reviewed and adopted.

- ✓ Section VIII of the agency's EEO Complaint Investigation Procedures established that "[t]he EEO Office will make a confidential written report of the investigation to the Commissioner or designee ... The Commissioner or designee will review the EEO Office's report and take any corrective action that s/he deems appropriate."
- EEO complaint files Nos. 17-109C, 18-002C, 18-012C, 18-013C 18-004C, 17-00010, 17-00011, 17-00012, 17-00013 and 17-00014 did not contain documentation that the agency head (or an approved direct report other than the General Counsel) reviewed the conclusive confidential reports and issued a determination adopting, rejecting or modifying the recommended corrective action. Corrective Action Required.

NOTE: Subsequent to the period in review, the agency provided signature pages to document that the agency head reviewed EEO complaint Nos. 17-109C, 18-002C, 18-004C, 18-012C, and 18-013C. The agency head's signatures however, were respectively dated 265, 206, 207, 193 and 205 days later than the date that the conclusive reports were issued.

Corrective Action 5: Establish and implement a policy whereby the agency head (or an approved direct report other than the General Counsel) reviews the principal investigator's conclusive report; issues a written/electronic determination adopting, rejecting, or modifying the recommended action; and signs each determination, via writing or electronically, to indicate it has been reviewed and adopted.

14. Inform each complainant and respondent of the conclusion and outcome of their complaint investigation in writing as part of the agency's complaint procedure.
- ✓ EEO complaint files Nos. 17-109C, 18-002C, 18-004C, 18-012C and 18-013C each contained written notice to the complainant and respondent of the conclusion and outcome of their complaint investigation.
 - EEO complaint files Nos. 17-00010, 17-00011, 17-00012, 17-00013 and 17-00014 did not contain notice to the complainant and respondent of the conclusion and outcome of their complaint investigation. Corrective Action Required.

Corrective Action 6: Inform each complainant and respondent of the conclusion and outcome of their complaint investigation in writing as part of the agency's complaint procedure.

15. Ensure each internal discrimination complaint file contains a written determination of its outcome and corrective action(s) taken as a result.
- ✓ Each internal EEO complaint file submitted (Nos. 17-109C, 18-002C, 18-004C, 18-012C, 18-013C, 17-00010, 17-00011, 17-00012, 17-00013 and 17-00014) contained a written determination of the outcome and corrective action taken as a result.

16. Notify the complainant and respondent in writing when the investigation by the EEO professional has been transferred because of the filing of an external complaint.
- ✓ Because none of the EEO complaint files submitted (Nos. 17-109C, 18-002C, 18-004C, 18-012C, 18-013C, 17-00010, 17-00011, 17-00012, 17-00013 and 17-00014) were transferred due to the filing of an external complaint, the agency's EEO Complaint Investigation Procedures and the agency's EEO Policy Manual 2016 were used to measure compliance with this standard. Section XIII of the agency's EEO Complaint Investigation Procedures stated the following regarding the filing of an external complaint, "[a] person does not give up this right when s/he files a complaint with HRA's EEO Office." The agency's EEO Policy Manual 2016 stated that "[w]hen a person files an external complaint with a Federal, State or local administrative agency based on or related to the same facts and circumstances of an internal complaint, the agency EEO Officer will transfer the matter to the agency General Counsel's Office, who will be responsible for any further handling of the matter. The EEO Officer will notify the complainant and the parties who are the subject of the complaint, in writing, that the EEO Office's investigation has been transferred due to the filing of an external complaint."
17. Establish and utilize a complaint tracking and monitoring system that permits the agency to identify the location, status, and length of time elapsed in the complaint investigation process, the issues and the bases of the complaints, the aggrieved individuals, and other information necessary to analyze complaint activity to identify trends.
- ✓ During the period in review, HRA and DHS each utilized the *Department of Social Services EEO Case Tracking System* that permitted the capture of the following fields: *Case number, Screen [intake] Date, Completion Date, Decision Sign off Date, Date Sent to Legal, Commissioner Signature Date, Complainant name, Respondent, and Title [for complainant and respondent]; agency via DHS Case check box; and Location, Complaints fall into EEO Protect Category, and Final Decision* via drop down menus.
18. Ensure that the General Counsel assists the agency head in identifying and determining appropriate responses to sexual harassment; works with the principal EEO Professional in the implementation of the City's policies and procedures pertaining to sexual harassment; informs the principal EEO Professional when external complaints or litigation involving sexual harassment is brought against the agency; is available to consult on internal sexual harassment complaint investigations; and is responsible for the investigation of, and response to, external sexual harassment complaints.
- ✓ The outcomes to two (2) of the submitted complaint files demonstrated that the General Counsel, the Office of Legal Affairs' Employment Law Division (OLA-ELD), which operates under the direction and guidance of the General Counsel, and the principal EEO Professional collaborated on internal complaint investigations and in the implementation of the policies and procedures pertaining to sexual harassment. Sections VI and VIII of the agency's EEO Complaint Investigation Procedures discussed the collaboration of the principal EEO Professional and General Counsel with regards to EEO matters and stated, "[a]ll EEO matters

will be handled under the supervision of HRA's EEO Office, in consultation with the HRA General Counsel's Office where appropriate... The EEO Officer or a person acting under the direction of the EEO Officer will conduct the investigation. In appropriate cases the investigation will be conducted in conjunction with the Agency's Disciplinary Officer, General Counsel's Office and/or Inspector General."

In addition, the General Counsel position description established that the General Counsel was the principal counsel to the Commissioner on all legal matters affecting the Agency, which would include assisting the agency head in identifying and determining appropriate responses to sexual harassment and the responsibility for the investigation of, and response to, external sexual harassment complaints. The agency's EEO Policy Manual 2016 elaborated that "[w]hen a person files an external complaint with a Federal, State or local administrative agency based on or related to the same facts and circumstances of an internal complaint, the agency EEO Officer will transfer the matter to the agency General Counsel's Office, who will be responsible for any further handling of the matter. The EEO Officer will notify the complainant and the parties who are the subject of the complaint, in writing, that the EEO Office's investigation has been transferred due to the filing of an external complaint. The General Counsel's Office will be responsible for handling external complaints regardless of the timing of such complaints. The transfer of the complaint to the agency General Counsel's Office should in no way preclude the EEO Officer from cooperating with the General Counsel's Office with respect to the ultimate resolution of the complaint."

IV. ANNUAL REVIEW OF PRACTICES, POLICIES AND PROGRAMS

Determination: The agency is in compliance with the standards for this subject area.

19. Ensure that the principal EEO Professional, HR Professional, and General Counsel, review the number of sexual harassment complaints, and the agency's employment practices, policies and programs on an annual basis to identify whether there are barriers to employment opportunities that may be related to sexual harassment and determine what, if any, actions are required to correct deficiencies.
- ✓ In 2016, EEO complaint summary memoranda were prepared by the principal EEO Professional for HRA for fiscal years 2015 and 2016, and reviewed with the OLA-ELD, General Counsel, and the agency head to identify trends and whether there were barriers to employment opportunities including those that may be related to sexual harassment. The complaint summary memoranda listed the complaint number, type of complaint and result of the investigation.
 - Prior to the 2017 EEO Office integration with HRA, DHS did not review the number of sexual harassment complaints, or its employment practices, policies and programs on an annual basis to identify whether there were barriers to employment opportunities that may be related to sexual harassment and determine what, if any, actions were required to correct deficiencies. Corrective Action Required.

- ✓ In 2017, after the integration of HRA and DHS, the agency analyzed EEO complaints from 2012 to 2017 to discover trends in EEO complaints, including sexual harassment, and in the counts and averages of the demographics of complainants, respondents and the agency workforce. Summary data revealed complaint trends that did not require corrective action.

V. RESPONSIBILITY FOR IMPLEMENTATION - EEO PROFESSIONALS

Determination: The agency is in partial compliance with the standards for this subject area.

20. Appoint a principal EEO Professional to implement EEO policies and standards within the agency. Ensure the principal EEO Professional is trained regarding city, state and federal EEO laws; the requirements of the agency's EEO policies, standards and procedures; and the prevention, investigation, and resolution of discrimination and sexual harassment complaints.
- ✓ HRA's principal EEO Professional (*Assistant Deputy Commissioner/Director EEO & Contract Compliance/EEO Officer*) was appointed in May 2005, and completed the following DCAS CTC's trainings: *Basic Diversity and EEO Training* for EEO professionals (April 2006), which covered EEO obligations under city, state and federal EEO laws; the agency's EEO policies, standards and procedures; and the prevention, investigation, and resolution of discrimination complaints. The principal EEO Professional also completed the following DCAS CTC trainings: *EEO Policy Implementation Briefing* (September 2005), *EEO Computer Based Training Preview* (June 2006), *Disability and Reasonable Accommodations Law* (June 2008), *Long Beach Implementation Workshop* (December 2008), *The ADA Amendments and Other Developments in Employment Law* (February 2009), *HR & EEO: A Team Approach to Hiring and Separation* (August 2009), *Influence Skills for EEO Officers* (February 2010), *Basic Mediation Skills for EEO Professionals* (November 2011), *Impact Your Mission: Ensuring that Qualified Applicants with Criminal Records Can Fairly Compete for Employment* (October 2012), *Conflict Resolution Training* (October 2012), *55-a Roundtable Discussion* (February 2013), *ADA and Reasonable Accommodation* (May 2013), *Religion in the Workplace* (June 2014), and *Sexual Harassment Prevention and Risks of Fraternalization* (February 2015).

DHS's principal EEO Professional (*Executive Director/EEO Officer*) was appointed in July 2014, and completed the following DCAS CTC trainings: *Basic Diversity and EEO Training* for EEO professionals (November 2011), *Training on Effective Complaint Investigations and How to Handle Challenging Situations* (May 2012), *Smart Solutions for Unacceptable Employee Behavior* (May 2012), *Everybody Matters - Train-the-Facilitator Program* (March 2013), *Tanenbaum Workshop: "Religion in the Workplace"* (May 2014), and *Building an Inclusive Culture: Understanding Unconscious Bias - Train the Trainer* (October 2015). DHS's principal EEO Professional also completed the following Cornell University School of Industrial and Labor Relations' trainings: *Training Difficult Issues in Diversity* (October 2013), *Harassment Prevention in the Workplace* (April 2013) and *Fundamentals of Diversity Initiatives* (April 2013). In addition DHS's principal EEO Professional also completed the EEOC Training Institute's training entitled *New York City Seminar 2015* (June 2015) and HRA's *EEO Structured Interviewing* training (September 2016).

In 2017, the EEO Offices of HRA and DHS were integrated. As a result, the HRA principal EEO Professional became the agency's principal EEO Professional with the responsibility of implementing EEO policies, standards and procedures and ensuring the EEO compliance of the combined workforce.

21. Ensure that the responsibilities of the principal EEO Professional are competently discharged by providing adequate resources such as opportunities for continuing education and professional development, and/or support staff to meet EEO obligations.
- ✓ During the period in review, each principal EEO Professional was afforded opportunities for continuing education and professional development training.

DHS's principal EEO Professional completed training in September 2016 (see §V.20) and HRA's principal EEO Professional participated in EEO conferences. The HRA principal EEO Professional's calendar included the *Working Mother Media's Multicultural Women's National Conference 2017* in July 2017, DCAS's *EEO Best Practices Meeting – Friday April 28th* in April 2017; "*Level the Playing Field – Making NYC the best Municipal Employer for Women*" in March 2017, and DCAS EEO Colloquium "*What's Best & What's Next for EEO, Diversity & Inclusion in the Public Sector?*" in October 2016.

The principal EEO Professionals for HRA and DHS each responded affirmatively to the EEPC's preliminary interview question that the responsibilities of the principal EEO Professional were competently discharged by training on EEO-related laws, policies, procedures and EEO analytics prior to the period in review (see §V.20), full-time dedicated EEO-related support staff (see §V.22), and job descriptions with tasks and standards specific to EEO-related responsibilities (see §V.22 and §V.24).

At the end of the period in review and post integration in 2017, the DSS-HRA-DHS principal EEO Professional's dedicated support staff included the DHS *Executive Director/EEO Officer* (DHS's former principal EEO Professional), HRA *Deputy EEO Officer*, three (3) *EEO Counselors*, two (2) *Reasonable Accommodation Coordinators*, an *EEO Associate*, and an *Executive Assistant*. The agency reported that complaint investigations were conducted by the principal EEO Professional, DHS *Executive Director/EEO Officer*, HRA *Deputy EEO Officer* and the *EEO Counselors*.

22. Where the agency's organizational structure necessitates multiple EEO professionals, select such individuals from different office locations and, where possible, from a variety of levels within the organizational structure. Appoint EEO professionals who are trained in EEO laws and procedures and their responsibilities under the EEO Policy.
- ✓ During the period in review, the agency maintained two centralized EEO Office locations for its HRA and DHS workforces. HRA principal EEO Professional's (*Assistant Deputy Commissioner/Director EEO & Contract Compliance/EEO Officer*) support staff included a *Deputy EEO Officer*, two (2) *EEO Counselors*, a *Reasonable Accommodation Coordinator*, and an *EEO Associate*. All EEO professionals responsible for conducting complaint investigations

were trained in EEO laws and procedures and their responsibilities under the EEO Policy. See section V.20 for details regarding the training received by HRA's *Assistant Deputy Commissioner/Director EEO & Contract Compliance/EEO Officer* (and subsequently the agency's principal EEO Professional). In addition, the *Deputy EEO Officer* completed the following DCAS CTC trainings: *Basic Diversity and EEO Training* for EEO professionals (May 2002), *Cyberbullying and Bias Harassment* (May 2012), *Transgender Awareness* (June 2012), and *Micro Triggers Workshop* (December 2012). Both *EEO Counselors* completed DCAS CTC's *Basic Diversity and EEO Training* for EEO professionals in April 2017. Access to continuing education and professional development was provided as EEO support staff as demonstrated by the HRA principal EEO Professional's invitations to EEO staff to attend EEO conferences.

The DHS principal EEO Professional's (*Executive Director/EEO Officer*) support staff included an *EEO Counselor*, a *Reasonable Accommodation Coordinator*, and an *Executive Assistant*. The EEO professionals responsible for conducting complaint investigations were trained in EEO laws and procedures and their responsibilities under the EEO Policy. Section V.20 details the training completed by DHS's principal EEO Professional. The DHS *EEO Counselor* completed DCAS CTC's *Basic Diversity and EEO Training* for EEO professionals (October 2016) and *Structured Interviewing and Unconscious Bias* (March 2017).

In December 2017, employees were informed of the integrated structure of the agency's EEO Office and two (2) EEO office locations, by the agency head's Sexual Harassment Policy distribution email. The email stated, "[a]t DSS-HRA-DHS, we encourage those who may be facing sexual harassment to come forward. All complaints will be handled in confidence, and appropriate actions will be taken following a review. DSS and HRA employees who need to file a complaint should immediately contact the EEO Office [location 1 provided] ... [and] DHS employees who need to file a complaint should immediately contact the EEO Office [location 2 provided]."

At the end of the period in review, the agency had a total of 15,478 employees and over 100 office locations. The agency's organizational charts indicated over 50 departments and illustrated the reporting hierarchy of the integrated EEO Offices of HRA and DHS. The agency maintained two EEO Office locations for HRA and DHS workforces. Under the integrated structure, and as outlined in their job descriptions, the DHS *Executive Director/EEO Officer* reported to the principal EEO Professional (*Assistant Deputy Commissioner/Director EEO & Contract Compliance/EEO Officer*) with wide latitude for independent action, judgment and decision making to oversee the day-to-day operations of the DHS EEO Office.

23. Ensure that the principal EEO Professional works cooperatively and closely with the General Counsel in the implementation of policies and procedures concerning EEO and sexual harassment.
- ✓ During the period in review, the principal EEO Professionals for HRA and DHS separately collaborated with General Counsel, and staff of OLA-ELD, in determining responses to specific EEO complaints, and regularly met with the agency head to discuss the impact of EEO issues and practices on the agency's EEO operation strategy and trends. Two (2) of the EEO

complaint files that the agency submitted indicate that they were referred to OLA-ELD at the end of the investigation for review and determination of corrective action. A third EEO complaint file revealed concerns beyond EEO, which were referred to the General Counsel for investigation.

24. Assign the principal EEO Professional (or EEO-related designee) the responsibility to supervise the activities of EEO professionals, and ensure that: the policies against sexual harassment and complaint procedures are distributed/posted at all agency locations; employees/managers receive sexual harassment prevention training; EEO-related policies are made available in alternative formats (i.e., large print, audio recording and/or Braille) upon request; managers, supervisors and human resource professionals receive guidance on issues pertaining to sexual harassment; and allegations of sexual harassment are promptly investigated.
- ✓ During the period in review, the principal EEO Professionals for HRA and DHS supervised the activities of the respective agency's EEO professionals (see §V.21 and §V.22); ensured that EEO policies could be accessed by all employees and viewed in large print, electronically, via the intranet; prepared and assisted in the implementation of the agency's EEO training plans (which included agency wide sexual harassment prevention training for fiscal year 2018; see §II.3); informed employees (including managers, supervisors and human resources professionals) of the EEO Office's contact information and availability to discuss EEO matters (see §I.1 and §I.2); and ensured that allegations of sexual harassment were investigated as demonstrated by the complaint investigation procedures and the agency's EEO complaint files. The job descriptions of the principal EEO Professional and the DHS *Executive Director/EEO Officer* (DHS's former principal EEO Professional) each outlined duties and responsibilities encompassing those identified above.
25. Ensure that the principal EEO Professional reports directly to the agency head (or a direct report other than the General Counsel) in order to exercise the necessary authority and independent judgment to fulfill EEO responsibilities.
- The agency did not demonstrate, that during the period in review (before the agency's integration), the principal EEO Professionals for HRA and DHS reported directly to the agency head. Corrective Action Required.

NOTE: Subsequent to the period in review, as of May 2018, the agency's organizational chart and EEO organizational chart indicated the agency's integrated reporting structure whereby the principal EEO Professional (the former HRA principal EEO Professional) reported directly to the agency head, and that the DHS *Executive Director/EEO Officer* (the former DHS principal EEO Professional) reported directly to the principal EEO Professional.

26. Maintain documentation regarding directives or decisions between the agency head (or a direct report other than the General Counsel) and the principal EEO Professional that impact the administration and operation of programs, policies or procedures concerning sexual harassment.

- ✓ Meeting agendas from June 2016 and March 2017 outlined that HRA's principal EEO Professional and the agency head met to discuss various EEO topics including: *DHS EEO Integration, Diversity Council, EEO booklet, Training, and EEO Plans.*

Meeting agendas from July 2017 and November 2017 outlined that the DHS's principal EEO Professional) and the agency head met to discuss various EEO topics including: *Reports, Diversity and Inclusion Summit, and Training.*

- The agency did not demonstrate that documentation of directives or decisions from the aforementioned meetings between the agency head and the principal EEO Professional was maintained. Corrective Action Required.

Corrective Action 7: Maintain documentation regarding directives or decisions between the agency head (or a direct report other than the General Counsel) and the principal EEO Professional that impact the administration and operation of programs, policies or procedures concerning sexual harassment.

VI. RESPONSIBILITY FOR IMPLEMENTATION – MANAGERS

Determination: The agency is in compliance with the standards for this subject area.

27. Ensure that managers and supervisors are held accountable for enforcing the agency's sexual harassment prevention policies and complaint procedures. Document this expectation and its implementation.
- ✓ In September 2016 (prior to the integration of the EEO Offices), the principal EEO Professionals of HRA and DHS made a joint presentation to their respective agencies' managers and supervisors to advise them that discussions regarding EEO must be held twice a year with their staffs. The PowerPoint used during the biannual presentation showed that the following topics were covered: “[e]ach manager and supervisors (sic) must be held accountable to the agency head for the effective implementation of the citywide EEO policy and related policies ... supervisors, managers or human resources personnel who receive EEO complaints, or otherwise become aware of any improper discrimination, must notify the agency EEO Officer ... staff can also file EEO complaints with External EEO enforcement agencies [and] ... these [mandated supervisory] discussions must be recorded [and procedures to record the discussions were provided].”

Additionally, subsequent to the integration of the EEO Offices, on November 6, 2017, the agency's principal EEO Professional emailed all managers and supervisors to reiterate that managers and supervisors must report to the EEO Office any behaviors that they observe, learn about, or suspect may be a violation of the agency's EEO Policy; emphasize their commitment to the agency's EEO policies; affirm the right of each employee to file a discrimination complaint with the EEO Office; and discuss EEO with their staff twice a year and document their EEO discussions with the EEO Office. Talking points to facilitate the mandatory discussions were provided.

The agency's EEO tracking record for the *Management Discussions* confirms that 2,028 supervisors held discussions during the calendar year 2017 (approximately 55.5% to 61.4% of the number of managers and supervisors in 2017⁸) and that 1,801 supervisors held discussions between November 2017 and June 8, 2018 (approximately 49.3% to 55.5% of the number of managers and supervisors in 2017⁹). Additionally, of the 2,028 supervisors that held discussions during calendar year 2017, 1,673 of them held discussions again between November 2017 and June 8, 2018 (approximately 45.8% to 50.6% of the number of managers and supervisors in 2017¹⁰).

- The agency did not demonstrate that it ensured that all managers and supervisors completed the mandated EEO talks or were otherwise held accountable for enforcing the agency's sexual harassment prevention policies and complaint procedures. Corrective Action Required.

Corrective Action 8: Ensure that managers and supervisors are held accountable for enforcing the agency's sexual harassment prevention policies and complaint procedures. Document this expectation and its implementation.

28. Ensure the managerial performance evaluation form contains a rating for EEO (which covers responsibilities and processes for assuring their ability to make employment decisions based on merit and equal consideration, or treat others in an equitable and impartial manner).
- ✓ During the period in review, the agency's managerial performance evaluation form contained a rating on EEO that covered responsibilities and processes for assuring that employment decisions were based on merit and equal consideration and that others were treated in an equitable manner

VII. REPORTING STANDARD FOR AGENCY HEAD:

Determination: The agency is in partial compliance with the standards for this subject area.

29. Submit to the EEPD an Annual Plan of measures and programs to provide equal employment opportunity, and quarterly reports¹¹ on efforts to implement the Plan within 30 days following each quarter. Include a breakout of sexual harassment complaint activity in each quarterly report.
- ✓ During the period in review, HRA and DHS submitted to the EEPD Annual Plans of measures and programs to provide equal employment opportunity, and quarterly reports on efforts to implement the Plans.

⁸ The agency estimated that the total number of active managers and supervisors in calendar year 2017 to be within a $\pm 5\%$ deviation of the 3,479 active managers and supervisors the agency had as of October 3, 2018.

⁹ Ibid.

¹⁰ Ibid.

¹¹ Submission of Quarterly Reports on EEO Activity is optional for non-Mayoral agencies.

- The agency did not include a breakout of complaint activity, including sexual harassment, in each quarterly report. Corrective Action Required.

Corrective Action 9: Submit to the EEPC an Annual Plan of measures and programs to provide equal employment opportunity, and quarterly reports on efforts to implement the Plan within 30 days following each quarter. Include a breakout of sexual harassment complaint activity in each quarterly report.

After implementation of the EEPC's corrective actions, if any:

1. Distribute a memorandum from the agency head informing employees of any changes implemented in the agency's policies and procedures against sexual harassment pursuant to the EEPC's audit, and re-emphasizing the agency head's commitment to the EEO program and the prevention of sexual harassment.

Final Action: Distribute a memorandum from the agency head informing employees of the EEPC's audit and any changes implemented in the agency's policies and procedures against sexual harassment pursuant to the EEPC's audit, and re-emphasizing the agency head's commitment to the EEO program and the prevention of sexual harassment.

Conclusion

The agency has 9 required corrective action(s) at this time.

Pursuant to Chapter 36 of the New York City Charter, your agency has the *option* to respond to this *preliminary determination*, but must respond to our Final Determination if corrective action is required.

Optional Response to preliminary determination: If submitted, your optional response should indicate, with attached documentation, what steps your agency has taken or will take to implement the prescribed corrective actions, and must be received in our office within 14 days from the date of this letter. No extensions will be granted for the *option* to respond to the *preliminary determination*.

(Optional Conference) During the Optional Conference, we will discuss the immediate steps your agency should take and address questions regarding your agency's implementation of the prescribed corrective action(s).

(No Response Option) If your agency does not respond to this preliminary determination within 14 days, it will become the EEPC's Final Determination.

Mandatory Response to Final Determination: Following this preliminary determination, the EEPC will issue a Final Determination where we may modify or eliminate the corrective actions based on



verified information; identify remaining action which requires further monitoring in order to ensure implementation; and assign a mandatory compliance-monitoring period of up to 6 months for this purpose. Pursuant to Chapter 36 of the New York City Charter your agency must respond to our Final Determination within 30 days. Your response to the Final Determination will initiate the compliance-monitoring period.

In closing, we want to thank you and your staff for the cooperation extended to the Equal Employment Practices Commission's EEO Program Analysts during the course of our audit and analysis.

Respectfully submitted by,

A handwritten signature in blue ink that reads "William Peterson". The signature is written in a cursive style and is positioned above a horizontal line.

William Peterson, EEO, Employment and Labor Relations Analyst

Approved by,

A handwritten signature in blue ink that reads "Charise L. Terry". The signature is written in a cursive style and is positioned above a horizontal line.

Charise L. Terry, PHR
Executive Director

c: Stephanie Grant, Principal EEO Professional, Department of Social Services
Athina McBean, DHS Executive Director/EEO Officer, Department of Social Services

Appendix - 1

Human Resources Administration
CEEDS Report: *Work Force Composition Summary*
2nd Quarter of Fiscal Year 2018
(End of Audit Period)

RUN DATE: 01/03/18
 RUN TIME: 14:40:14.0

NEW YORK CITY DEPARTMENT OF CITYWIDE ADMINISTRATIVE SERVICES
 CITYWIDE EQUAL EMPLOYMENT DATABASE SYSTEM (CEEDS)
 WORK FORCE COMPOSITION SUMMARY
 QUARTER 2 YEAR 2018 AGENCY 069 HRA/DEPARTMENT OF SOCIAL SERVICES

PAGE: 84
 REPORT: EBEP210

AGENCY CODE : 069 HRA/DEPARTMENT OF SOCIAL SERVICES
 EEO JOB GROUP : 001 ADMINISTRATORS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN		
12935	DEPUTY COMMISSIONER	0	0	0	0	0	0	1	0	1	0	0	0	0	2
94370	HUMAN RESOURCES ADMINISTRA	1	0	0	0	0	0	0	0	0	0	0	0	0	1
95576	EXECUTIVE DEPUTY ADMINISTR	0	0	0	0	0	0	1	1	1	0	0	0	0	3
95659	GENERAL COUNSEL (HOMELESS	0	1	0	0	0	0	0	0	0	0	0	0	0	1
95688	GENERAL COUNSEL (HRA)	0	0	0	0	0	0	1	0	0	0	0	0	0	1
EEO JOB GROUP TOTAL.....:		1	1	0	0	0	0	3	1	2	0	0	0	0	8
		12.50	12.50	0.00	0.00	0.00	0.00	37.50	12.50	25.00	0.00	0.00	0.00	0.00	100.00

AGENCY CODE : 069 HRA/DEPARTMENT OF SOCIAL SERVICES
 EEO JOB GROUP : 002 MANAGERS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN		
10001	ADMINISTRATIVE ACCOUNTANT	1	3	0	1	0	0	2	3	1	0	0	0	0	11
10003	ADMINISTRATIVE GRAPHIC ART	0	0	0	0	0	0	1	0	0	0	0	0	0	2
10004	ADMINISTRATIVE ARCHITECT	1	0	0	0	0	0	0	0	0	1	0	0	0	1
10009	ADMINISTRATIVE BUSINESS PR	0	0	0	0	0	0	1	0	0	0	0	0	0	1
10010	ADMINISTRATIVE MANAGEMENT	3	1	0	3	0	0	0	2	0	1	0	0	0	10
10015	ADMINISTRATIVE ENGINEER	1	0	0	1	0	0	0	0	0	0	0	0	0	2
1002F	ADMINISTRATIVE COMMUNITY R	4	4	4	0	0	0	8	11	3	1	0	1	0	36
10020	ADMINISTRATIVE INVESTIGATO	3	6	0	0	0	0	2	21	6	0	0	0	0	38
10022	ADMINISTRATIVE COMMUNITY R	0	0	0	0	0	0	1	2	0	0	0	0	0	3
10025	ADMINISTRATIVE MANAGER	0	1	0	0	0	0	0	3	0	0	0	0	0	4
10026	ADMINISTRATIVE STAFF ANALY	8	1	1	0	0	0	10	4	2	3	0	1	0	30
10033	ADMINISTRATIVE PUBLIC INFO	6	1	1	0	0	0	4	1	3	2	0	0	0	18
10035	ADMINISTRATIVE SUPERVISOR	2	1	0	1	0	0	1	0	0	0	0	0	0	5
10037	ADMINISTRATIVE SPACE ANALY	0	1	1	1	0	0	0	2	3	0	0	0	0	8
10038	ADMINISTRATIVE STOREKEEPER	1	0	0	2	0	0	0	0	0	0	0	0	0	3
10050	COMPUTER SYSTEMS MANAGER	34	13	4	17	0	2	17	6	1	6	0	0	0	100
10056	ADMINISTRATIVE DIRECTOR OF	12	24	7	3	0	0	26	56	25	2	0	0	0	155
10069	HEALTH SERVICES MANAGER	0	0	0	0	0	0	0	2	0	0	0	0	0	2
10074	COMPUTER OPERATIONS MANAGE	1	3	0	1	0	0	1	2	0	1	0	0	0	9
10095	ADMINISTRATIVE CONTRACT SP	2	1	4	1	0	0	0	7	3	0	0	0	0	18
10096	ADMINISTRATIVE PRINTING SE	1	2	0	0	0	0	0	0	0	0	0	0	0	3
10136	DEPUTY DIRECTOR OF ADMINIS	0	1	1	1	0	0	1	1	0	1	0	0	0	6
10152	DIRECTOR OF ADMINISTRATION	1	0	0	0	0	0	0	0	0	0	0	0	0	1
1024A	ADMINISTRATIVE JOB OPPORTU	2	6	3	0	0	0	0	10	3	0	0	0	0	24
12880	SECRETARY TO THE DEPARTMEN	0	0	0	0	0	0	1	0	0	0	0	0	0	1
12929	ASSISTANT COMMISSIONER (BU	0	0	0	0	0	0	1	0	0	0	0	0	0	1
13275	DIRECTOR OF MANAGEMENT PLA	0	0	0	0	0	0	3	0	1	0	0	1	0	5
13383	EXECUTIVE PROGRAM SPECIALI	1	0	0	0	0	0	1	0	0	1	0	0	0	3
34202	CONSTRUCTION PROJECT MANAG	1	1	0	1	0	0	0	0	0	0	0	0	0	3
52279	SUPERINTENDENT OF ADULT IN	0	1	0	0	0	0	0	0	0	0	0	0	0	1
52486	DEPUTY DIRECTOR OF ADMINIS	0	0	1	0	0	0	0	2	0	0	0	1	0	4

RUN DATE: 01/03/18
 RUN TIME: 14:40:14.0

NEW YORK CITY DEPARTMENT OF CITYWIDE ADMINISTRATIVE SERVICES
 CITYWIDE EQUAL EMPLOYMENT DATABASE SYSTEM (CEEDS)
 WORK FORCE COMPOSITION SUMMARY

PAGE: 85
 REPORT: EBEP210

QUARTER 2 YEAR 2018 AGENCY 069 HRA/DEPARTMENT OF SOCIAL SERVICES

52487	DEPUTY DIRECTOR OF ADMINIS	0	0	0	0	0	0	1	2	2	0	0	0	0	5
82950	AGENCY CHIEF CONTRACTING O	1	0	0	0	0	0	0	0	0	0	0	0	0	1
82984	TELECOMMUNICATIONS MANAGER	1	0	0	0	0	0	0	0	0	0	0	0	0	1
82986	ADMINISTRATIVE RETIREMENT	0	0	0	0	0	0	0	1	0	0	0	0	0	1
82991	ADMINISTRATIVE CONSTRUCTIO	1	0	0	0	0	0	0	0	0	0	0	0	0	1
82994	ADMINISTRATIVE LABOR RELAT	1	0	0	0	0	0	0	0	0	0	0	0	0	1
95005	EXECUTIVE AGENCY COUNSEL	13	0	2	2	0	0	21	4	2	2	0	0	0	46
95604	ASSOCIATE COMMISSIONER FOR	0	0	0	0	0	0	1	0	0	0	0	0	0	1
95605	ASSOCIATE COMMISSIONER FOR	0	0	0	0	0	0	0	1	0	0	0	0	0	1
95606	DIRECTOR OF PUBLIC INFORMA	1	0	0	0	0	0	0	0	0	0	0	0	0	1
95607	EXECUTIVE ASSISTANT TO THE	0	0	0	0	0	0	0	1	1	0	0	0	0	2
95609	DIRECTOR OF LABOR RELATION	0	0	0	0	0	0	1	0	0	0	0	0	0	1
95658	DIRECTOR OF EQUAL EMPLOYME	0	0	0	0	0	0	0	1	0	0	0	0	0	1
95667	DEPUTY DIRECTOR OF LABOR R	0	1	0	0	0	0	0	1	0	0	0	0	0	2
95670	EXECUTIVE ASST TO THE EXEC	0	0	0	0	0	0	0	0	0	0	0	1	0	1
95671	ASSISTANT COMMISSIONER FOR	0	0	0	0	0	0	1	0	0	0	0	0	0	1
95680	DEPUTY GENERAL COUNSEL (HR	1	0	0	0	0	0	1	0	0	0	0	0	0	2
95681	DIRECTOR OF FISCAL OPERATI	0	1	0	0	0	0	0	0	0	0	0	0	0	1
95683	DIRECTOR OF LEGISLATIVE CO	0	0	0	0	0	0	1	0	0	0	0	0	0	1
95685	DIRECTOR OF POLICY AND ECO	1	0	0	0	0	0	0	0	0	0	0	0	0	1
95689	SPECIAL ASSISTANT TO THE H	1	0	0	0	0	0	0	0	0	1	0	0	0	2
95800	ASSISTANT COMMISSIONER (SO	1	1	0	0	0	0	2	2	0	0	0	0	0	6
95802	DEPUTY ASSISTANT COMMISSIO	0	0	0	0	0	0	0	0	1	0	0	0	0	1
95811	DIRECTOR OF COMMUNITY PART	0	0	0	0	0	0	0	0	1	0	0	0	0	1
95812	DIRECTOR OF COMPLIANCE & L	0	1	0	0	0	0	0	0	0	0	0	0	0	1
95815	DIRECTOR OF EQUAL EMPLOYMNT	0	0	0	0	0	0	0	1	0	0	0	0	0	1
95816	DIRECTOR OF FOOD STAMP PRO	0	0	0	0	0	0	1	0	0	0	0	0	0	1
95818	DIRECTOR OF HOME CARE SERV	0	0	0	1	0	0	0	0	0	0	0	0	0	1
95821	DIRECTOR OF MANAGMNT SYSTM	1	0	0	0	0	0	0	0	0	0	0	0	0	1
95822	DIRECTOR OF POLICY ANALYSI	1	0	0	0	0	0	1	0	0	0	0	0	0	2
EEO JOB GROUP TOTAL.....:		109	75	29	36	0	2	112	149	58	22	0	5	0	597
		18.24	12.56	4.86	6.03	0.00	0.34	18.76	24.96	9.72	3.69	0.00	0.84	0.00	100.00

AGENCY CODE : 069 HRA/DEPARTMENT OF SOCIAL SERVICES
 EEO JOB GROUP : 003 MANAGEMENT SPECIALISTS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN		
06316	INVESTIGATOR (DISCIPLINE)	1	0	0	2	0	0	1	0	1	0	0	0	0	5
1002A	ADMINISTRATIVE STAFF ANALY	35	25	7	17	0	1	32	59	11	11	0	1	0	199
1002C	ADMINISTRATIVE MANAGER NON	4	13	6	2	0	0	5	51	6	1	0	1	0	89
1002D	ADMINISTRATIVE STAFF ANALY	19	5	4	3	0	0	5	12	9	7	0	0	0	64
1002E	ADMINISTRATIVE STAFF ANALY	4	0	0	1	0	0	7	2	1	1	0	0	0	16
12158	PROCUREMENT ANALYST	1	3	1	4	0	0	5	11	8	2	0	0	0	35
12626	STAFF ANALYST	16	29	7	8	0	0	17	50	9	11	0	0	0	147
12627	ASSOCIATE STAFF ANALYST	21	29	9	9	0	0	21	53	9	6	0	0	0	157
13369	ASSOCIATE LABOR RELATIONS	0	0	0	0	0	0	1	3	0	0	0	0	0	4
13386	STRATEGIC INITIATIVE SPECI	0	0	0	0	0	0	1	0	0	0	0	0	0	1
22427	ASSOCIATE PROJECT MANAGER	1	0	0	0	0	0	0	0	0	0	0	0	0	1
40502	MANAGEMENT AUDITOR	3	13	1	4	0	0	3	3	0	5	0	0	0	32
40510	ACCOUNTANT	4	2	0	0	0	0	3	3	1	4	0	0	0	17

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NEW YORK CITY DEPARTMENT OF CITYWIDE ADMINISTRATIVE SERVICES
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40561	CONTRACT SPECIALIST	1	3	0	2	0	0	1	5	0	0	0	0	0	12
40562	ASSOCIATE CONTRACT SPECIAL	1	1	0	1	0	0	1	3	0	0	0	0	0	7
50938	STRATEGIC INITIATIVE SPECI	0	0	0	0	0	0	0	0	1	0	0	0	0	1
54737	CONFIDENTIAL STRATEGY PLAN	1	1	0	0	0	0	2	2	1	1	0	0	0	8
60860	BUSINESS PROMOTION COORDIN	0	0	1	1	0	0	0	0	1	1	0	0	0	4
80112	REAL PROPERTY MANAGER	0	0	0	0	0	0	0	1	0	0	0	0	0	1
80184	SPACE ANALYST	5	3	4	2	0	0	0	5	2	0	0	0	0	21
8297A	ADMINISTRATIVE PROCUREMENT	3	5	1	0	0	0	3	11	3	1	0	0	0	27
8299A	ADMINISTRATIVE CONSTRUCTIO	1	0	0	0	0	0	0	0	0	0	0	0	0	1
8300B	ADMINISTRATIVE PROJECT MAN	0	0	0	0	0	0	0	1	0	0	0	0	0	1
EEO JOB GROUP TOTAL.....:		121	132	41	56	0	1	108	275	63	51	0	2	0	850
		14.23	15.53	4.82	6.59	0.00	0.12	12.71	32.35	7.41	6.00	0.00	0.24	0.00	100.00

AGENCY CODE : 069 HRA/DEPARTMENT OF SOCIAL SERVICES
 EEO JOB GROUP : 004 SCIENCE PROFESSIONALS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP	
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN			
1001A	ADMINISTRATIVE ENGINEER (N	0	0	0	1	0	0	0	0	0	0	0	0	0	0	1
13611	COMPUTER ASSOCIATE (TECHNI	2	11	5	7	0	0	1	29	13	3	1	0	0	0	72
13621	COMPUTER ASSOCIATE (OPERAT	5	15	7	1	0	1	3	7	1	1	0	0	0	0	41
13622	COMPUTER SPECIALIST (OPERA	4	3	1	0	0	0	0	0	0	0	0	0	0	0	8
13631	COMPUTER ASSOCIATE (SOFTWA	5	7	2	8	0	0	11	10	4	9	0	0	0	0	56
13632	COMPUTER SPECIALIST (SOFTW	82	46	16	86	1	3	43	20	10	51	0	1	0	0	359
13643	CERTIFIED IT DEVELOPER (AP	1	0	0	5	0	0	1	0	0	0	0	0	0	0	7
13644	CERTIFIED IT ADMINISTRATOR	2	0	0	1	0	0	1	0	0	0	0	0	0	0	4
13651	COMPUTER PROGRAMMER ANALYS	0	0	0	0	0	0	1	2	0	2	0	0	0	0	5
13652	CERTIFIED IT ADMINISTRATOR	7	3	4	7	0	0	0	1	0	1	0	0	0	0	23
13691	*CERTIFIED LOCAL AREA NETW	3	4	3	1	0	0	0	0	1	1	0	0	0	0	13
13692	*CERTIFIED WIDE AREA NETWO	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1
13693	*CERTIFIED APPLICATIONS DE	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1
13694	*CERTIFIED DATABASE ADMINI	0	0	0	1	0	0	0	0	0	0	0	0	0	0	1
20246	TELECOMMUNICATIONS ASSOCIA	1	1	0	0	0	0	0	0	0	0	0	0	0	0	2
20247	TELECOMMUNICATIONS ASSOCIA	1	1	0	0	0	0	0	0	0	0	0	0	0	0	2
20415	MECHANICAL ENGINEER	0	0	0	1	0	0	0	0	0	0	0	0	0	0	1
21210	ASSISTANT ARCHITECT	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
21215	ARCHITECT	1	0	0	1	0	0	0	0	0	2	0	0	0	0	4
21744	CITY RESEARCH SCIENTIST (A	15	1	2	3	0	0	19	4	1	6	1	0	0	0	52
60910	RESEARCH ASSISTANT	0	0	0	0	0	0	1	2	0	0	0	0	0	0	3
91628	OILER	4	0	0	0	0	0	0	0	0	0	0	0	0	0	4
EEO JOB GROUP TOTAL.....:		134	93	40	123	1	4	82	75	30	76	2	1	0	661	
		20.26	14.07	6.05	18.61	0.15	0.61	12.41	11.35	4.54	11.50	0.30	0.15	0.00	100.00	

AGENCY CODE : 069 HRA/DEPARTMENT OF SOCIAL SERVICES
 EEO JOB GROUP : 005 HEALTH PROFESSIONALS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN		

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50910	STAFF NURSE	3	1	0	0	0	0	13	10	1	1	0	0	0	29
50935	HEAD NURSE	0	1	0	0	0	0	4	6	1	1	0	0	0	13
50960	SUPERVISOR OF NURSES	1	1	0	0	0	0	2	1	2	0	0	0	0	7
52895	MEDICAL SPECIALIST	0	1	0	0	1	0	0	0	0	1	0	0	0	3
53211	PSYCHIATRIST (PER HOUR)	7	1	0	1	0	0	1	0	0	0	0	1	0	11
EEO JOB GROUP TOTAL.....:		11	5	0	1	1	0	20	17	4	3	0	1	0	63
		17.45	7.94	0.00	1.59	1.59	0.00	31.75	26.98	6.35	4.76	0.00	1.59	0.00	100.00

AGENCY CODE : 069 HRA/DEPARTMENT OF SOCIAL SERVICES
 EEO JOB GROUP : 006 SOCIAL SCIENTISTS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN		
1005A	ADMINISTRATIVE CITY PLANNE	0	0	1	0	0	0	0	0	0	0	0	0	0	1
22122	CITY PLANNER	1	0	0	0	0	0	0	0	0	0	0	0	0	1
EEO JOB GROUP TOTAL.....:		1	0	1	0	0	0	0	0	0	0	0	0	0	2
		50.00	0.00	50.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00

AGENCY CODE : 069 HRA/DEPARTMENT OF SOCIAL SERVICES
 EEO JOB GROUP : 007 SOCIAL WORKERS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN		
10104	ELIGIBILITY SPECIALIST	36	227	88	57	1	2	172	1111	477	127	8	16	0	2322
10248	ADMINISTRATIVE JOB OPPORTU	1	22	4	1	0	1	3	48	16	2	0	0	0	98
51613	CONSULTANT (PUBLIC HEALTH	0	2	0	0	0	0	0	3	3	2	0	0	0	10
51638	SENIOR CONSULTANT (PUBLIC	4	0	1	0	0	0	3	7	1	0	0	0	0	16
52304	CASEWORKER	60	267	46	46	1	0	134	640	162	38	10	8	0	1412
52311	SUPERVISOR I (SOCIAL SERVI	10	72	20	8	0	0	30	192	43	5	4	0	0	384
52312	SUPERVISOR II (SOCIAL SERV	4	41	11	2	0	1	4	72	11	1	1	0	0	148
52313	SUPERVISOR III (SOCIAL SER	3	3	2	1	0	0	0	17	4	1	0	0	0	31
52314	JOB OPPORTUNITY SPECIALIST	71	186	41	102	3	2	136	597	188	68	7	6	0	1407
52316	ASSOCIATE JOB OPPORTUNITY	12	110	32	13	0	0	49	396	142	23	4	2	0	783
52613	SOCIAL WORKER	0	3	1	0	0	0	3	54	11	1	0	0	0	73
52631	SUPERVISOR I (SOCIAL WORK)	0	2	0	0	0	0	3	23	3	1	0	0	0	32
52632	SUPERVISOR II (SOCIAL WORK	1	1	1	0	0	0	2	0	1	0	0	0	0	6
52633	SUPERVISOR III (SOCIAL WOR	2	0	0	0	0	0	0	5	0	0	0	0	0	7
EEO JOB GROUP TOTAL.....:		204	936	247	230	5	6	539	3165	1062	269	34	32	0	6729
		3.02	13.91	3.67	3.42	0.07	0.09	8.01	47.04	15.78	4.00	0.51	0.48	0.00	100.00

AGENCY CODE : 069 HRA/DEPARTMENT OF SOCIAL SERVICES
 EEO JOB GROUP : 008 LAWYERS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN		

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30085 *ATTORNEY AT LAW	2	0	0	1	0	0	5	0	0	0	0	0	0	0	8
30086 AGENCY ATTORNEY INTERNE	2	1	0	0	0	1	2	1	2	2	0	0	0	0	11
30087 AGENCY ATTORNEY	20	7	8	8	0	1	29	16	3	4	0	3	0	99	
EEO JOB GROUP TOTAL.....:	24	8	8	9	0	2	36	17	5	6	0	3	0	118	
	20.34	6.78	6.78	7.63	0.00	1.69	30.51	14.41	4.24	5.08	0.00	2.54	0.00	100.00	

AGENCY CODE : 069 HRA/DEPARTMENT OF SOCIAL SERVICES
 EEO JOB GROUP : 009 PUBLIC RELATIONS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN		
91415	GRAPHIC ARTIST	0	3	1	0	0	0	1	1	1	0	0	0	0	7
EEO JOB GROUP TOTAL.....:		0.02	42.86	14.29	0.00	0.00	0.00	14.29	14.29	14.29	0.00	0.00	0.00	0.00	7

AGENCY CODE : 069 HRA/DEPARTMENT OF SOCIAL SERVICES
 EEO JOB GROUP : 010 TECHNICIANS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN		
13615	COMPUTER SERVICE TECHNICIA	2	2	0	4	0	0	1	0	1	0	0	0	0	10
13616	SUPERVISING COMPUTER SERVI	0	0	0	2	0	0	0	1	0	0	0	0	0	3
13620	COMPUTER AIDE	1	0	2	0	0	0	2	1	2	0	0	0	8	
30080	PARALEGAL AIDE	5	0	0	1	0	0	4	7	2	0	0	0	19	
31113	FRAUD INVESTIGATOR	27	135	28	15	1	0	22	235	65	10	1	0	539	
31118	ASSOCIATE FRAUD INVESTIGAT	17	43	12	6	0	0	7	99	23	2	1	0	210	
31121	ASSOCIATE INVESTIGATOR	0	0	0	0	0	0	0	0	1	0	0	0	1	
56006	*HUMAN RESOURCES TECHNICIA	0	0	0	0	0	0	0	0	1	0	0	0	1	
EEO JOB GROUP TOTAL.....:		52	180	42	28	1	0	36	343	95	12	2	0	791	
		6.57	22.76	5.31	3.54	0.13	0.00	4.55	43.36	12.01	1.52	0.25	0.00	100.00	

AGENCY CODE : 069 HRA/DEPARTMENT OF SOCIAL SERVICES
 EEO JOB GROUP : 012 CLERICAL SUPERVISORS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN		
06784	EXECUTIVE ASSISTANT (DOMES	0	0	0	0	0	0	1	1	3	0	0	0	5	
10124	PRINCIPAL ADMINISTRATIVE A	23	144	38	20	0	0	51	799	166	39	6	4	1290	
EEO JOB GROUP TOTAL.....:		23	144	38	20	0	0	52	800	169	39	6	4	1295	
		1.78	11.12	2.93	1.54	0.00	0.00	4.02	61.78	13.05	3.01	0.46	0.31	100.00	

AGENCY CODE : 069 HRA/DEPARTMENT OF SOCIAL SERVICES
 EEO JOB GROUP : 013 CLERICAL

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		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN			
10250	CLERICAL AIDE	1	0	1	0	0	0	0	2	0	0	0	0	0	0	4
10251	CLERICAL ASSOCIATE	18	74	21	11	1	1	52	520	157	47	6	4	0	912	
10252	SECRETARY	0	0	0	0	0	0	2	20	5	1	0	0	0	28	
11702	OFFICE MACHINE AIDE	0	6	0	0	0	0	0	6	3	0	0	0	0	15	
11704	SUPERVISOR OF OFFICE MACHI	2	6	2	1	0	0	1	3	3	1	0	0	0	19	
12200	STOCK WORKER	2	2	0	0	0	0	1	1	0	0	0	0	0	6	
12202	SUPERVISOR OF STOCK WORKER	0	3	0	0	0	0	1	1	0	0	0	0	0	5	
12876	SECRETARY TO THE COMMISSIO	0	0	0	0	0	0	0	0	1	0	0	0	0	1	
40526	BOOKKEEPER	10	12	1	6	0	1	22	18	3	22	0	0	0	95	
EEO JOB GROUP TOTAL.....:		33	103	25	18	1	2	79	571	172	71	6	4	0	1085	
		3.06	9.49	2.30	1.66	0.09	0.18	7.28	52.63	15.85	6.54	0.55	0.37	0.00	100.00	

AGENCY CODE : 069 HRA/DEPARTMENT OF SOCIAL SERVICES
 EEO JOB GROUP : 015 POLICE SUPERVISORS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN		
70821	DEPUTY DIRECTOR OF SECURIT	3	0	0	0	0	0	0	0	0	0	0	0	0	3
70822	DIRECTOR OF SECURITY	0	1	0	0	0	0	0	0	0	0	0	0	0	1
EEO JOB GROUP TOTAL.....:		3	1	0	0	0	0	0	0	0	0	0	0	0	4
		75.00	25.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00

AGENCY CODE : 069 HRA/DEPARTMENT OF SOCIAL SERVICES
 EEO JOB GROUP : 018 POLICE

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN		
70810	SPECIAL OFFICER	4	21	6	2	0	0	0	22	6	0	0	2	0	63
70817	SUPERVISING SPECIAL OFFICE	6	11	10	0	0	0	1	10	3	0	0	0	0	41
EEO JOB GROUP TOTAL.....:		10	32	16	2	0	0	1	32	9	0	0	2	0	104
		9.63	30.77	15.38	1.92	0.00	0.00	0.96	30.77	8.65	0.00	0.00	1.92	0.00	100.00

AGENCY CODE : 069 HRA/DEPARTMENT OF SOCIAL SERVICES
 EEO JOB GROUP : 021 HEALTH SERVICES

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN		
81803	INSTITUTIONAL AIDE	0	1	1	0	0	0	0	0	1	0	0	0	0	3
EEO JOB GROUP TOTAL.....:		0	1	1	0	0	0	0	0	1	0	0	0	0	3
		0.01	33.33	33.33	0.00	0.00	0.00	0.00	0.00	33.33	0.00	0.00	0.00	0.00	100.00

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AGENCY CODE : 069 HRA/DEPARTMENT OF SOCIAL SERVICES
 EEO JOB GROUP : 022 BUILDING SERVICES

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN		
52275	ASSISTANT SUPERINTENDENT O	0	2	0	0	0	0	9	1	0	0	0	0	0	12
80609	CUSTODIAN	3	52	14	1	0	0	5	4	0	0	0	0	79	
82015	*CUSTODIAL ASSISTANT	0	4	0	0	0	0	0	0	0	0	0	0	4	
90644	CITY CUSTODIAL ASSISTANT	0	1	0	0	0	0	0	2	0	0	0	0	3	
EEO JOB GROUP TOTAL.....:		3	59	14	1	0	0	14	7	0	0	0	0	98	
		3.06	60.20	14.29	1.02	0.00	0.00	14.29	7.14	0.00	0.00	0.00	0.00	100.00	

AGENCY CODE : 069 HRA/DEPARTMENT OF SOCIAL SERVICES
 EEO JOB GROUP : 025 CRAFT

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN		
34205	SUPERVISOR OF ELECTRICAL I	1	0	0	0	0	0	0	0	0	0	0	0	1	
90698	MAINTENANCE WORKER	0	1	0	0	0	0	0	0	0	0	0	0	1	
90723	LOCKSMITH	1	0	0	1	0	0	0	0	0	0	0	0	2	
91638	SENIOR STATIONARY ENGINEER	2	0	0	0	0	0	0	0	0	0	0	0	2	
91644	STATIONARY ENGINEER	1	1	1	0	0	0	0	0	0	0	0	0	3	
91717	ELECTRICIAN	4	3	0	1	0	0	0	0	0	0	0	0	8	
91769	SUPERVISOR ELECTRICIAN	2	0	0	0	0	0	0	0	0	0	0	0	2	
91915	PLUMBER	7	1	0	0	0	0	0	0	0	0	0	0	8	
91972	SUPERVISOR PLUMBER	1	0	1	0	0	0	0	0	0	0	0	0	2	
92005	CARPENTER	12	1	0	0	0	0	0	0	0	0	0	0	13	
92071	SUPERVISOR CARPENTER	1	0	1	0	0	0	0	0	0	0	0	0	2	
92170	SUPERVISING BOOKBINDER	1	0	0	0	0	0	0	0	0	0	0	0	1	
92210	CEMENT MASON	2	0	0	0	0	0	0	0	0	0	0	0	2	
92340	SHEET METAL WORKER	0	1	0	0	0	0	0	0	0	0	0	0	1	
EEO JOB GROUP TOTAL.....:		35	8	3	2	0	0	0	0	0	0	0	0	48	
		72.91	16.67	6.25	4.17	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00	

AGENCY CODE : 069 HRA/DEPARTMENT OF SOCIAL SERVICES
 EEO JOB GROUP : 026 OPERATORS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN		
92122	ASSISTANT PRINTING PRESS O	0	2	0	0	0	0	0	0	0	0	0	0	2	
92123	PRINTING PRESS OPERATOR	1	0	1	0	0	0	0	0	0	0	0	0	2	
EEO JOB GROUP TOTAL.....:		1	2	1	0	0	0	0	0	0	0	0	0	4	
		25.00	50.00	25.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00	

AGENCY CODE : 069 HRA/DEPARTMENT OF SOCIAL SERVICES

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EEO JOB GROUP : 027 TRANSPORTATION

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP	
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN			
91212	MOTOR VEHICLE OPERATOR	2	3	1	1	0	0	0	1	0	0	0	0	0	0	8
91232	MOTOR VEHICLE SUPERVISOR	0	3	0	0	0	0	0	1	0	0	0	0	0	4	
EEO JOB GROUP TOTAL.....:		16.67	50.00	8.33	8.33	0.00	0.00	0.00	16.67	0.00	0.00	0.00	0.00	0.00	12	

AGENCY CODE : 069 HRA/DEPARTMENT OF SOCIAL SERVICES
 EEO JOB GROUP : 028 LABORERS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN		
90702	CITY LABORER	9	6	2	0	0	0	0	0	0	0	0	0	0	17
91722	ELECTRICIAN'S HELPER	0	5	1	0	0	0	0	0	0	0	0	0	6	
91926	STEAM FITTER'S HELPER	0	1	0	0	0	0	0	0	0	0	0	0	1	
EEO JOB GROUP TOTAL.....:		37.50	50.00	12.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	24	

AGENCY CODE : 069 HRA/DEPARTMENT OF SOCIAL SERVICES
 EEO JOB GROUP : 030 TEACHERS AND COUNSELORS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN		
51110	PUBLIC HEALTH EDUCATOR	4	4	1	4	0	0	6	12	4	7	0	4	0	46
EEO JOB GROUP TOTAL.....:		8.68	8.70	2.17	8.70	0.00	0.00	13.04	26.09	8.70	15.22	0.00	8.70	0.00	46

AGENCY CODE : 069 HRA/DEPARTMENT OF SOCIAL SERVICES
 EEO JOB GROUP : 031 PARA PROFESSIONAL OCCUPATIONS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN		
52405	HOMEMAKER	0	0	0	0	0	0	0	1	1	0	0	0	0	2
56056	COMMUNITY ASSISTANT	3	20	7	3	1	0	2	22	17	1	0	2	78	
56057	COMMUNITY ASSOCIATE	20	22	24	12	1	4	16	53	81	12	1	3	249	
56058	COMMUNITY COORDINATOR	14	26	20	7	0	4	21	79	48	12	1	11	243	
EEO JOB GROUP TOTAL.....:		6.45	11.89	8.92	3.85	0.35	1.40	6.82	27.10	25.70	4.37	0.35	2.80	572	

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AGENCY TOTAL.....:	817	1873	563	553	11	25	1114	5629	1829	581	52	74	0	13121
	6.24	14.27	4.29	4.21	0.08	0.19	8.49	42.90	13.94	4.43	0.40	0.56	0.00	100.00

Appendix - 2

Department of Homeless Services
CEEDS Report: *Work Force Composition Summary*
2nd Quarter of Fiscal Year 2018
(End of Audit Period)

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NEW YORK CITY DEPARTMENT OF CITYWIDE ADMINISTRATIVE SERVICES
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AGENCY CODE : 071 DEPARTMENT OF HOMELESS SERVICES
 EEO JOB GROUP : 001 ADMINISTRATORS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP	
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN			
95652	DEPUTY COMMISSIONER (HOMEL	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
EEO JOB GROUP TOTAL.....:		0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00

AGENCY CODE : 071 DEPARTMENT OF HOMELESS SERVICES
 EEO JOB GROUP : 002 MANAGERS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN		
1002F	ADMINISTRATIVE COMMUNITY R	3	3	1	2	0	1	0	9	3	0	0	0	0	22
10022	ADMINISTRATIVE COMMUNITY R	0	0	1	0	0	0	0	0	0	1	0	0	0	2
10026	ADMINISTRATIVE STAFF ANALY	1	0	0	0	0	0	0	0	0	0	0	0	1	
10028	ADMINISTRATIVE NUTRITIONIS	0	0	0	0	0	0	1	0	0	0	0	0	1	
10035	ADMINISTRATIVE SUPERVISOR	5	1	2	0	0	0	0	0	0	0	0	0	8	
10050	COMPUTER SYSTEMS MANAGER	1	0	0	0	0	0	0	0	0	1	0	0	2	
10056	ADMINISTRATIVE DIRECTOR OF	4	24	8	2	0	0	12	50	14	2	0	0	116	
10095	ADMINISTRATIVE CONTRACT SP	1	4	0	0	0	0	1	2	0	0	0	0	8	
1024A	ADMINISTRATIVE JOB OPPORTU	0	0	0	0	0	0	2	3	0	0	0	0	5	
12912	ASSISTANT DEPUTY COMMISSIO	0	1	0	0	0	0	0	1	0	0	0	0	2	
13383	EXECUTIVE PROGRAM SPECIALI	0	0	0	0	0	0	1	0	0	0	0	1	2	
34202	CONSTRUCTION PROJECT MANAG	1	1	0	1	0	0	0	0	0	0	0	0	3	
52279	SUPERINTENDENT OF ADULT IN	0	5	1	0	0	0	0	3	1	0	0	0	10	
5304A	AGENCY MEDICAL DIRECTOR	0	0	0	0	0	0	0	0	0	1	0	0	1	
82991	ADMINISTRATIVE CONSTRUCTIO	0	0	0	2	0	0	0	0	0	0	0	0	2	
83006	ADMINISTRATIVE HOUSING DEV	0	0	0	0	0	0	0	2	0	0	0	0	2	
95653	EXECUTIVE ASSISTANT TO THE	1	0	0	0	0	0	0	0	0	0	0	0	1	
95654	ASSISTANT COMMISSIONER FOR	0	0	0	0	0	0	1	0	0	0	0	0	1	
95679	ASSISTANT DEPUTY ADMINISTR	0	0	0	0	0	0	1	0	0	0	0	0	1	
EEO JOB GROUP TOTAL.....:		17.00	39.00	13.00	7.00	0.00	1.00	19.00	70.00	18.00	5.00	0.00	1.00	0.00	190.00

AGENCY CODE : 071 DEPARTMENT OF HOMELESS SERVICES
 EEO JOB GROUP : 003 MANAGEMENT SPECIALISTS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN		
1002A	ADMINISTRATIVE STAFF ANALY	7	9	1	4	0	0	4	14	1	0	0	0	40	
1002C	ADMINISTRATIVE MANAGER NON	0	1	1	1	0	0	1	9	3	0	0	0	16	
1002D	ADMINISTRATIVE STAFF ANALY	1	0	1	0	0	0	1	1	0	0	0	0	4	
1002E	ADMINISTRATIVE STAFF ANALY	1	1	0	0	0	0	1	1	1	0	0	0	5	
12626	STAFF ANALYST	0	0	0	0	0	0	0	7	0	0	0	0	7	

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12627	ASSOCIATE STAFF ANALYST	4	5	3	4	0	0	2	8	2	0	0	0	0	28
22427	ASSOCIATE PROJECT MANAGER	1	3	0	2	0	0	0	0	0	0	0	0	0	6
40562	ASSOCIATE CONTRACT SPECIAL	0	0	0	0	0	0	0	1	0	0	0	0	0	1
80184	SPACE ANALYST	2	3	2	0	0	0	3	1	0	1	0	0	0	12
EEO JOB GROUP TOTAL.....:		16	22	8	11	0	0	12	42	7	1	0	0	0	119
		13.46	18.49	6.72	9.24	0.00	0.00	10.08	35.29	5.88	0.84	0.00	0.00	0.00	100.00

AGENCY CODE : 071 DEPARTMENT OF HOMELESS SERVICES
 EEO JOB GROUP : 004 SCIENCE PROFESSIONALS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP	
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN			
13631	COMPUTER ASSOCIATE (SOFTWA	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1
20415	MECHANICAL ENGINEER	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
21215	ARCHITECT	0	0	0	1	0	0	0	0	0	0	0	0	0	0	1
21744	CITY RESEARCH SCIENTIST (A	0	0	0	0	0	0	2	0	0	1	0	0	0	0	3
60910	RESEARCH ASSISTANT	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1
91628	OILER	6	1	2	1	0	0	0	0	0	0	0	0	0	0	10
EEO JOB GROUP TOTAL.....:		6	2	2	2	0	0	3	0	1	1	0	0	0	0	17
		35.31	11.76	11.76	11.76	0.00	0.00	17.65	0.00	5.88	5.88	0.00	0.00	0.00	100.00	

AGENCY CODE : 071 DEPARTMENT OF HOMELESS SERVICES
 EEO JOB GROUP : 006 SOCIAL SCIENTISTS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP	
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN			
1005A	ADMINISTRATIVE CITY PLANNE	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1
EEO JOB GROUP TOTAL.....:		0	0	0	0	0	0	0	0	1	0	0	0	0	0	1
		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	100.00	

AGENCY CODE : 071 DEPARTMENT OF HOMELESS SERVICES
 EEO JOB GROUP : 007 SOCIAL WORKERS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP	
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN			
10248	ADMINISTRATIVE JOB OPPORTU	3	2	0	0	0	0	0	2	2	0	0	0	0	0	9
51214	COUNSELOR (ADDICTION TREAT	0	1	0	0	0	0	0	3	0	0	0	0	0	0	4
52304	CASEWORKER	3	14	4	4	0	0	3	50	4	1	0	0	0	0	83
52311	SUPERVISOR I (SOCIAL SERVI	2	8	1	1	0	0	1	13	2	0	0	0	0	0	28
52312	SUPERVISOR II (SOCIAL SERV	0	1	1	0	0	0	0	6	0	0	0	0	0	0	8
52613	SOCIAL WORKER	1	1	2	0	0	0	2	13	6	1	0	1	1	0	28
52632	SUPERVISOR II (SOCIAL WORK	1	5	1	0	0	0	1	13	3	0	0	1	0	0	25
60430	RECREATION DIRECTOR	0	0	1	0	0	0	0	0	2	0	0	0	0	0	3

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EEO JOB GROUP TOTAL.....: 10 32 10 5 0 0 7 100 19 2 0 2 1 188
 5.33 17.02 5.32 2.66 0.00 0.00 3.72 53.19 10.11 1.06 0.00 1.06 0.53 100.00

AGENCY CODE : 071 DEPARTMENT OF HOMELESS SERVICES
 EEO JOB GROUP : 010 TECHNICIANS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN- KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN- KNOWN		
31113	FRAUD INVESTIGATOR	4	32	9	7	0	0	2	39	10	0	0	0	0	103
31118	ASSOCIATE FRAUD INVESTIGAT	3	29	4	1	0	0	0	20	10	0	0	0	67	
31121	ASSOCIATE INVESTIGATOR	0	1	0	0	0	0	0	0	0	0	0	0	1	
56006	*HUMAN RESOURCES TECHNICIA	0	1	0	0	0	0	0	0	0	0	0	0	1	
EEO JOB GROUP TOTAL.....:		7	63	13	8	0	0	2	59	20	0	0	0	172	
		4.07	36.63	7.56	4.65	0.00	0.00	1.16	34.30	11.63	0.00	0.00	0.00	100.00	

AGENCY CODE : 071 DEPARTMENT OF HOMELESS SERVICES
 EEO JOB GROUP : 012 CLERICAL SUPERVISORS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN- KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN- KNOWN		
10124	PRINCIPAL ADMINISTRATIVE A	4	4	1	0	0	0	1	19	3	0	0	0	32	
EEO JOB GROUP TOTAL.....:		4	4	1	0	0	0	1	19	3	0	0	0	32	
		12.48	12.50	3.13	0.00	0.00	0.00	3.13	59.38	9.38	0.00	0.00	0.00	100.00	

AGENCY CODE : 071 DEPARTMENT OF HOMELESS SERVICES
 EEO JOB GROUP : 013 CLERICAL

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN- KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN- KNOWN		
10251	CLERICAL ASSOCIATE	0	1	1	0	0	0	0	14	1	1	0	0	18	
10252	SECRETARY	0	0	0	0	0	0	0	3	1	0	0	0	4	
12200	STOCK WORKER	0	3	1	1	0	0	0	1	0	0	0	0	6	
12202	SUPERVISOR OF STOCK WORKER	1	2	0	0	0	0	0	0	0	0	0	0	3	
12876	SECRETARY TO THE COMMISSIO	0	0	0	0	0	0	0	1	0	0	0	0	1	
EEO JOB GROUP TOTAL.....:		1	6	2	1	0	0	0	19	2	1	0	0	32	
		3.11	18.75	6.25	3.13	0.00	0.00	0.00	59.38	6.25	3.13	0.00	0.00	100.00	

AGENCY CODE : 071 DEPARTMENT OF HOMELESS SERVICES
 EEO JOB GROUP : 018 POLICE

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN- KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN- KNOWN		
70810	SPECIAL OFFICER	26	237	83	24	4	3	6	280	55	2	4	0	724	

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70817 SUPERVISING SPECIAL OFFICE	5	38	24	1	0	0	0	33	9	0	0	0	0	110
EEO JOB GROUP TOTAL.....:	31	275	107	25	4	3	6	313	64	2	4	0	0	834
	3.72	32.97	12.83	3.00	0.48	0.36	0.72	37.53	7.67	0.24	0.48	0.00	0.00	100.00

AGENCY CODE : 071 DEPARTMENT OF HOMELESS SERVICES
 EEO JOB GROUP : 022 BUILDING SERVICES

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN		
52275	ASSISTANT SUPERINTENDENT O	2	29	6	1	0	0	0	20	1	1	0	0	0	60
80710	HOUSEKEEPER	0	1	1	1	0	0	0	1	0	0	0	0	0	4
EEO JOB GROUP TOTAL.....:		2	30	7	2	0	0	0	21	1	1	0	0	0	64
		3.12	46.88	10.94	3.13	0.00	0.00	0.00	32.81	1.56	1.56	0.00	0.00	0.00	100.00

AGENCY CODE : 071 DEPARTMENT OF HOMELESS SERVICES
 EEO JOB GROUP : 025 CRAFT

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN		
90698	MAINTENANCE WORKER	4	8	1	0	0	0	0	0	0	0	0	0	0	13
90723	LOCKSMITH	0	0	2	0	0	0	0	0	0	0	0	0	0	2
90774	SUPERVISOR OF MECHANICS	2	0	0	0	0	0	0	0	0	0	0	0	0	2
91638	SENIOR STATIONARY ENGINEER	1	0	0	0	0	0	0	0	0	0	0	0	0	1
91644	STATIONARY ENGINEER	1	1	0	0	0	0	0	0	0	0	0	0	0	2
91717	ELECTRICIAN	4	4	1	3	0	0	0	0	0	0	0	0	0	12
91769	SUPERVISOR ELECTRICIAN	2	0	0	1	0	0	0	0	0	0	0	0	0	3
91830	PAINTER	0	0	1	0	0	0	0	2	0	0	0	0	0	3
91873	SUPERVISOR PAINTER	0	0	1	0	0	0	0	0	0	0	0	0	0	1
91915	PLUMBER	7	2	4	1	0	0	0	0	1	0	0	0	0	15
91972	SUPERVISOR PLUMBER	3	0	0	0	0	0	0	0	0	0	0	0	0	3
92005	CARPENTER	14	1	2	1	0	0	1	0	0	0	0	0	0	19
92071	SUPERVISOR CARPENTER	3	0	0	0	0	0	0	0	0	0	0	0	0	3
92210	CEMENT MASON	3	2	1	0	0	0	0	0	0	0	0	0	0	6
92271	SUPERVISOR BRICKLAYER	1	0	0	0	0	0	0	0	0	0	0	0	0	1
92340	SHEET METAL WORKER	2	0	0	0	0	0	0	0	0	0	0	0	0	2
EEO JOB GROUP TOTAL.....:		47	18	13	6	0	0	1	2	1	0	0	0	0	88
		53.41	20.45	14.77	6.82	0.00	0.00	1.14	2.27	1.14	0.00	0.00	0.00	0.00	100.00

AGENCY CODE : 071 DEPARTMENT OF HOMELESS SERVICES
 EEO JOB GROUP : 027 TRANSPORTATION

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN		
91212	MOTOR VEHICLE OPERATOR	10	20	4	2	0	0	0	1	0	0	1	0	0	38
91232	MOTOR VEHICLE SUPERVISOR	1	3	2	0	0	0	0	2	0	0	0	0	0	8

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QUARTER 2 YEAR 2018

91279 SUPERVISOR OF MOTOR TRANSP	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
EEO JOB GROUP TOTAL.....:	11	24	6	2	0	0	0	3	0	0	1	0	0	0	47
	23.40	51.06	12.77	4.26	0.00	0.00	0.00	6.38	0.00	0.00	2.13	0.00	0.00	0.00	100.00

AGENCY CODE : 071 DEPARTMENT OF HOMELESS SERVICES
 EEO JOB GROUP : 028 LABORERS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN		
90702	CITY LABORER	1	14	4	0	0	0	0	0	0	0	0	0	0	19
91722	ELECTRICIAN'S HELPER	0	1	0	0	0	0	0	0	0	0	0	0	0	1
91916	PLUMBER'S HELPER	1	0	1	0	0	0	0	0	0	0	0	0	2	
EEO JOB GROUP TOTAL.....:		2	15	5	0	0	0	0	0	0	0	0	0	22	
		9.09	68.18	22.73	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00	

AGENCY CODE : 071 DEPARTMENT OF HOMELESS SERVICES
 EEO JOB GROUP : 031 PARA PROFESSIONAL OCCUPATIONS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN		
56056	COMMUNITY ASSISTANT	1	67	17	2	2	5	0	34	6	0	0	2	0	136
56057	COMMUNITY ASSOCIATE	1	34	17	2	0	1	2	40	30	1	0	3	0	131
56058	COMMUNITY COORDINATOR	9	56	28	7	1	3	7	125	38	2	0	7	0	283
EEO JOB GROUP TOTAL.....:		11	157	62	11	3	9	9	199	74	3	0	12	0	550
		1.99	28.55	11.27	2.00	0.55	1.64	1.64	36.18	13.45	0.55	0.00	2.18	0.00	100.00

AGENCY TOTAL.....:	165	687	249	80	7	13	60	848	211	16	5	15	1	2357
	7.00	29.15	10.56	3.39	0.30	0.55	2.55	35.98	8.95	0.68	0.21	0.64	0.04	100.00

Appendix - 3

Department of Social Services (Human Resources Administration
Department of Homeless Services)
*Human Resources Administration/ Department of Social Services
Equal Employment Opportunity Policy Manual 2016*

NEW YORK CITY HUMAN RESOURCES ADMINISTRATION/ DEPARTMENT OF SOCIAL SERVICES

EQUAL EMPLOYMENT OPPORTUNITY

Policy Manual **2016**



Human Resources Administration
Department of Social Services
Steven Banks, *Commissioner*

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HRA'S COMMITMENT TO EQUAL EMPLOYMENT OPPORTUNITY AND DIVERSITY AND INCLUSION

THE POLICIES AND PROCEDURES SET FORTH IN THIS MANUAL CONSTITUTE

the Equal Employment Opportunity ("EEO") Policy of the Human Resources Administration ("HRA") of the City of New York. This EEO Policy is consistent with the Federal, State and local laws and New York Citywide EEO Policies that prohibit discrimination, harassment, including sexual harassment, and retaliation in employment decisions. These laws also prohibit discrimination against individuals with disabilities and ensure that reasonable accommodations are provided for qualified individuals.

The Agency's mission is to meet clients where they are. HRA enhances the quality of life for all New Yorkers by providing temporary help to eligible individuals and families with social service and economic needs in order to assist them in leading independent lives. These goals are accomplished through the effective administration of a broad range of social welfare programs and services. We believe that the diversity of our community is a fundamental strength of our city. Our mission is best fulfilled when we embrace diversity as a value and a practice. We maintain that achieving diversity requires an enduring commitment to inclusion that must find full expression in our organizational culture, values, norms and behaviors. Throughout our work, we will support diversity in all of its forms. Leading by example we aspire to make diversity a core and abiding strength of our Agency.

HRA is firmly committed to promoting a diverse workforce and maintaining fair employment practices for its employees and applicants and ensuring that employment decisions are made on the basis of merit, fitness and equality of opportunity and without regard to an individual's membership in any of the EEO protected categories. HRA does not tolerate retaliation against individuals for filing an EEO complaint, assisting in an EEO investigation, opposing discrimination or harassment and/or requesting a reasonable accommodation.

The EEO Office serves as the Agency's EEO complaint and investigation division, where employees can obtain confidential and impartial assistance in addressing potential EEO issues and requesting reasonable accommodations. Any employees found to be engaging in discriminatory behavior or practices will be subject to disciplinary action.

As Commissioner, I fully support the EEO Office's efforts to ensure that equal employment opportunities are available to all HRA employees, applicants, temporary employees, employment and training program participants and the client population we serve. The EEO Office conducts mandated trainings to inform employees of their rights and responsibilities pursuant to the law. All program heads, managers, supervisors, and line employees will be accountable for adherence to the Agency's EEO Policy manual, as well as for creating and maintaining a work environment that is free of discrimination and encourages mutual respect and acceptance of differences within our ranks. Accepting and learning from our diversity only strengthens the Agency by enhancing our ability to work together as a united workforce.

The implementation of the Agency's EEO Policy is one of HRA's highest priorities and has my full commitment and support. I encourage you to avail yourselves of the information provided within the EEO Policy manual and on the EEO Office's link on HRA's intranet page. Please use this material and their office as a resource to evaluate not only the behavior of others, but also to ensure that your conduct is respectful and professional at all times.

STEVEN BANKS
COMMISSIONER

EQUAL EMPLOYMENT OPPORTUNITY OFFICE

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Milagros Cordero – Reasonable Accommodation Coordinator

Cindy Harris – EEO Associate

EEO Policies and Procedures in Alternative Formats

Please be advised that applicants and employees who have impaired vision, but can still see, can adjust the size of the fonts and contrast on a computer to enhance the clarity and sharpness of the text in order to read the policies, procedures and this manual. Large print copies of these documents are also available upon request.

Our policies and procedures are available in Adobe Acrobat (.pdf) format. Adobe Acrobat has a “read out loud feature.” The read out loud feature provides the audio version to a (.pdf) file. This feature assists visually impaired or blind individuals upon request. The instructions to activate the read out loud feature are the following:

1. Open the (.pdf) file of the policy or the manual;
2. Go to “View.” Choose the “Read Out Loud” from the drop down menu;
3. Choose “Activate Read Out Loud;”
4. Go back to “View.” Choose the “Read Out Loud” from the drop down menu;
5. Choose the desired option (i.e. read the page only or read to the end of the document).

Please contact the EEO Office directly for questions and concerns about the availability of the EEO policies and procedures in other alternative formats.

GLOSSARY OF TERMS AND DEFINITIONS

AGE | THE PERIOD OF TIME SOMEONE HAS BEEN ALIVE. IN GENERAL, anti-discrimination laws, regulations and policies protect persons age 18 or older ♦

ALIENAGE | THE CITIZENSHIP OF ANY PERSON, OR THE IMMIGRATION STATUS of any person who is not a citizen or national of the United States ♦

ASEXUAL | ONE WHO LACKS SEXUAL INTEREST OR DESIRE FOR SEX ♦

ASSOCIATION | HAVING A RELATIONSHIP WITH A PERSON, INCLUDING, BUT NOT limited to, marriage or domestic partnership; membership in or connection to an organization; or having a name that is associated with a particular group ♦

BISEXUAL | ONE WHO HAS SEXUAL INTEREST IN OR ATTRACTION TO MEMBERS of both sexes ♦

CAREGIVER | A PERSON WHO PROVIDES DIRECT AND ONGOING CARE FOR A MINOR child (under the age of 18) or a care recipient ♦

CARE RECIPIENT | A PERSON WITH A DISABILITY WHO IS EITHER A COVERED RELATIVE, or a person who resides in the caregiver's household and who relies on the caregiver for medical care or to meet the needs of daily living. A covered relative is defined as a caregiver's child, spouse, domestic partner, parent, sibling, grandchild or grandparent, or the child or parent of the caregiver's spouse or domestic partner, or any other individual in a familial relationship with the caregiver as designated by the rules of the New York City Commission on Human Rights ♦

CITIZENSHIP STATUS | SEE ALIENAGE ♦

CIVIL SERVICE LAW §55-A PROGRAM COORDINATOR | AN INDIVIDUAL WHO IS designated to provide information to qualified employees or applicants with disabilities who seek to be appointed under provisions of Section 55-a of the New York State Civil Service Law and to act as a Liaison with the Department of Citywide Administrative Services with respect to the 55-a program ♦

COLOR | THE NATURAL PIGMENTATION OF A PERSON'S SKIN. FREQUENTLY VIEWED synonymously with race, discrimination based on color may occur because of a preference for, or aversion to, a particular skin color and may occur within the same racial group where discriminator distinctions are made based on skin pigmentation ♦

COMPLAINANT | ONE WHO ALLEGES THAT S/HE IS A MEMBER OF A PROTECTED CLASS and has been subjected to negative, unfair or offensive treatment because of his/her membership in that class. A complainant may be a "third party complainant," who may not be the subject of the discriminatory or harassing conduct, but is exposed to or affected by such conduct ♦

COMPLAINT | ALLEGATIONS OF NEGATIVE, UNFAIR OR OFFENSIVE TREATMENT BECAUSE of one's membership in a protected class(es). Complaints may be filed internally (HRA EEO Office) or externally (relevant Fair Employment Practices Agencies) ♦

CONSUMER CREDIT HISTORY | AN INDIVIDUAL'S CREDIT WORTHINESS, CREDIT STANDING, credit capacity, or payment history, as indicated by a consumer credit report, credit score, or information an employer obtains directly from the individual regarding details about credit accounts (including the individual's number of credit accounts, late or missed payments, charged-off debts, items in collections, credit limit, prior credit report inquiries) or bankruptcies, judgments or liens ♦

CREED | PERTAINS TO A PERSON'S SINCERELY HELD RELIGIOUS BELIEFS AND INCLUDES the wearing of religious garb and the observances of religious holidays and practices ♦

CROSS-DRESSER | CROSS-DRESSING REFERS TO PEOPLE WHO WEAR CLOTHING AND/OR makeup and accessories that are not traditionally associated with their biological sex. Cross-dressers are sometimes called "transvestites," but that term is considered pejorative. Many people who cross-dress are comfortable with their assigned sex and generally do not wish to change it. Cross-dressing is a form of gender expression that is not necessarily indicative of a person's gender identity or sexual orientation ♦

DISABILITY | A PHYSICAL, MEDICAL, MENTAL, OR PSYCHOLOGICAL IMPAIRMENT OR A history or record of such impairment. This includes an impairment of any system of the body, such as the neurological system, the musculoskeletal system, the special sense organs, the respiratory system, the cardiovascular system, the reproductive system, the immunological systems, the skin, and the endocrine system ♦

REASONABLE ACCOMMODATIONS COORDINATOR | AN INDIVIDUAL DESIGNATED BY THE agency head or EEO Officer to handle reasonable accommodations.

DISCRIMINATION | CONDUCT OR ACTION TAKEN AGAINST A PERSON OR GROUP (either intentionally or unintentionally) based on the person's protected category that adversely affects the terms and conditions of their employment ♦

EEO LIAISON | AN EEO LIAISON'S RESPONSIBILITY IS TO PROVIDE INFORMATION TO employees about the EEO Policy and procedures. EEO Liaisons are not authorized to conduct investigations or comment and/or make determinations about EEO complaints. EEO Liaisons must inform the EEO Office about any EEO issues of which they become aware ♦

EEO COUNSELOR | AN INDIVIDUAL DESIGNATED BY THE AGENCY HEAD OR EEO OFFICER to handle EEO-related matters ♦

EEO OFFICER | AN INDIVIDUAL WHO IS DESIGNATED BY AN AGENCY HEAD TO IMPLEMENT the City's EEO policies and standards within the agency ♦

GENDER/SEX | THE PHYSICAL AND/OR SOCIAL CONDITION OF BEING MALE OR FEMALE. Gender may include actual or perceived sex, a person's gender identity, self-image, appearance, behavior or expression, whether or not that gender identity, self-image, appearance, behavior or expression is different from that traditionally associated with the legal gender assigned to that person at birth ♦

GENDER DYSPHORIA | GENDER DYSPHORIA IS A PSYCHOLOGICAL DIAGNOSIS recognized by the American Psychiatric Association (APA). This disorder is marked by clinically significant distress caused by a marked difference between the individual's expressed/experienced gender and the gender others would assign him or her ♦

GENDER EXPRESSION | GENDER EXPRESSION REFERS TO ALL OF THE EXTERNAL characteristics and behaviors that are socially defined as either masculine or feminine, such as dress, grooming, mannerisms, speech patterns and social interactions. Social or cultural norms can vary widely and some characteristics that may be accepted as masculine, feminine or neutral in one culture may not be assessed similarly in another ♦

GENDER IDENTITY | THE TERM "GENDER IDENTITY," DISTINCT FROM THE TERM "sexual orientation," refers to a person's innate, deeply felt psychological identification as a man, woman or some other gender, which may or may not correspond to the sex assigned to them at birth (e.g., the sex listed on their birth certificate) ♦

GENDER TRANSITION | TRANSITIONING IS THE PROCESS SOME TRANSGENDER PEOPLE go through to begin living as the gender with which they identify, rather than the sex assigned to them at birth. This may or may not include hormone therapy, sex reassignment surgery and other medical procedures ♦

HARASSMENT | CONDUCT THAT HAS THE PURPOSE OR EFFECT OF UNREASONABLY interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment. For purposes of discrimination, harassment must be based on a protected characteristic. Harassment may include, but is not limited to, conduct that involves vulgar language, abusive acts or language, hostility, physical aggression, intimidation, or unequal treatment ♦

HETEROSEXUAL | ONE WHO HAS SEXUAL INTEREST IN OR ATTRACTION TO MEMBERS of the opposite sex ♦

HOMOSEXUAL | ONE WHO HAS SEXUAL INTEREST IN OR ATTRACTION TO member of one's own sex ♦

IMMIGRATION STATUS | SEE ALIENAGE ♦

IMPLICATED PARTY | A PERSON WHO IS NOT INITIALLY NAMED AS A RESPONDENT in an EEO investigation, but becomes involved because of information obtained about his/her conduct towards a party in the investigation or concerning the issue ♦

MARITAL STATUS | WHETHER A PERSON IS MARRIED, DIVORCED, SINGLE, SEPARATED, or widowed ♦

MILITARY STATUS | A PERSON'S PARTICIPATION IN THE MILITARY SERVICE OF the United States or the military service of the state, including, but not limited to, the Armed Forces of the United States, the Army National Guard, the Air National Guard, the New York Naval Militia, and any such additional forces as may be created by the federal or state government as authorized by law. Also, in certain circumstances, New York State law provides for up to ten (10) days of unpaid leave to the spouse of a military person ♦

NATIONAL ORIGIN | ONE'S PLACE OF ORIGIN, ANCESTRY, CITIZENSHIP STATUS, OR ANY physical, cultural, linguistic, or ethnic characteristics of, or names associated with, a particular country or region ♦

PARTNERSHIP STATUS | PERSONS WHO ARE IN A REGISTERED DOMESTIC PARTNERSHIP pursuant to NYC Law or Executive Order. In addition, persons who are members of domestic partnerships or civil unions lawfully entered into in another jurisdiction are protected under Partnership Status ♦

PREDISPOSING GENETIC CHARACTERISTICS | THE PRESENCE OF A VARIATION IN THE composition of one's genes that is scientifically or medically identifiable and is determined to be associated with an increased statistical risk of being expressed as a physical or mental disease or disability in the individual but which has not resulted in any symptoms of such disease or disorder. Put more simply, this means the presence of a gene which increases the risk of having a disease or disability ♦

PRIOR RECORD OF ARREST OR CONVICTION | NEW YORK LAW PROHIBITS discrimination based upon criminal record. Under The Fair Chance Act, employers must make a conditional job offer before inquiring into the criminal history of an applicant or conducting any criminal history search. If, after receiving information regarding the applicant's record, the employer no longer wants to employ the applicant, the employer must explain why and provide a copy of the record. This explanation must take into account existing New York law that prohibits discrimination based upon criminal record. The position is then held open for three days so the employer and applicant can engage in an interactive discussion, considering the employer's requirements and the applicant's evidence of good conduct. This time also allows the applicant to question any inaccuracies on the record ♦

RACE | A GROUP OF PEOPLE WITH PARTICULAR SIMILAR PHYSICAL CHARACTERISTICS WHO are considered as belonging to the same type. The Equal Employment Opportunity Commission has described "race" as "a local geographical or global human population distinguished as a more or less distinct group by genetically transmitted physical characteristics or any group of people united or classified together on the basis of a common history, nationality or geographical distribution" ♦

REASONABLE ACCOMMODATION FOR DISABILITIES | ANY ADJUSTMENT OR ALTERATION of a facility, equipment or job duty made by the employer that enables a person with a disability to apply for a job, perform essential job duties, or enjoy equal benefits and privileges of employment. An employer is not required to accommodate an employee or applicant with a disability if doing so would impose an undue hardship on the employer's legitimate business interests ♦

REASONABLE ACCOMMODATION FOR PREGNANCY, CHILDBIRTH OR RELATED MEDICAL CONDITIONS | The law requires employers to provide reasonable accommodations to pregnant women and those who suffer medical conditions related to pregnancy and childbirth. Agencies must reasonably accommodate an employee's pregnancy, childbirth, or related medical conditions that enable such persons to perform the essential requisites of a job, provided that (i) the pregnancy, childbirth or related medical condition is known or should have been known by the Agency and (ii) such accommodation does not cause undue hardship in the conduct of the Agency's business ♦

REASONABLE ACCOMMODATION FOR RELIGION | ANY ADJUSTMENT TO THE WORK environment that will allow the employee to practice religious observances, practices, or beliefs. Flexible scheduling, voluntary substitutions or swaps, job reassignments and lateral transfers, and modifying workplace practices, policies and/or procedures are examples of how an employer might accommodate an employee's religious beliefs. An employer is not required to accommodate an employee's religious observances, practices or beliefs if doing so would impose an undue hardship on the employer's legitimate business interests ♦

REASONABLE ACCOMMODATION FOR A VICTIM OR WITNESS OF DOMESTIC VIOLENCE, SEX OFFENSES OR STALKING |

Any adjustment to a job structure, workplace facility, or work requirement, including a transfer, reassignment, modified schedule, leave, a change in telephone number or seating assignment, installation of a lock, or implementation of a safety procedure, in response to actual or threatened domestic or sexual violence, sexual offenses or stalking. An employer is not required to accommodate an employee who is a victim or witness of domestic violence, sex offenses or stalking if doing so would impose an undue hardship in the employer's legitimate business interests ♦

RELIGION | A SINCERELY HELD BELIEF IN A DEITY OR OTHER MORAL, ETHICAL OR OTHER code of conduct, including religious observances, practices and beliefs. The EEOC has defined "religious practices" to include "moral or ethical beliefs as to what is right and wrong which are sincerely held with the strength of traditional religious views ... The fact that no religious group espouses such beliefs or the fact that the religious group to which the individual professes to belong may not accept such belief will not determine whether the belief is a religious belief" ♦

RESPONDENT | ONE WHO HAS BEEN ACCUSED OF SUBJECTING ANOTHER TO UNFAIR, offensive, or discriminatory treatment ♦

RETALIATION | AN UNLAWFUL EMPLOYMENT ACTION AND A VIOLATION OF EEO POLICY to retaliate against or harass any person for filing an EEO complaint, cooperating in an EEO investigation, opposing discrimination, or engaging in other protected activity, such as requesting a reasonable accommodation ♦

SEXUAL ORIENTATION | "SEXUAL ORIENTATION" IS THE PREFERRED TERM USED WHEN referring to an individual's physical and/or emotional attraction to the same and/or opposite gender. "Gay," "lesbian," "bisexual" and "straight" are all examples of sexual orientations. A person's sexual orientation is distinct from a person's gender identity and expression ♦

TRANSGENDER | TRANSGENDER – OR TRANS – IS AN UMBRELLA TERM FOR PEOPLE whose gender identity or expression is different from those typically associated with the sex assigned to them at birth (e.g., the sex listed on their birth certificate). Not all people who consider themselves (or who may be considered by others as) transgender will undergo a gender transition ♦

UNEMPLOYMENT STATUS | AN INDIVIDUAL IS PROTECTED FROM DISCRIMINATION ON the basis of his or her unemployment status. The terms "unemployed" or "unemployment" are defined as: (i) not having a job; (ii) being available for work; and (iii) seeking employment ♦

VICTIM OR WITNESS OF DOMESTIC VIOLENCE, SEX OFFENSES OR STALKING |

A person who has been subjected to acts or threats of domestic or sexual violence or conduct with intent to harass, annoy or alarm a person or to fear the same, when these acts are committed by a current or former spouse of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabited with the victim, by a person who is or has been in a continuing social relationship of a romantic or intimate nature with the victim, or a person who is or has continually or at regular intervals lived in the same household as the victim ♦

GENERAL ANTI-DISCRIMINATION POLICY

The New York City Human Resources Administration (“HRA”) is an Equal Employment Opportunity (“EEO”) employer committed to ensuring fair employment practices and compliance with Federal, State, and local laws prohibiting employment discrimination.¹ Underscoring this policy is HRA’s concern for each employee’s dignity and well-being, and its commitment to providing a safe, productive, and professional work environment for all employees. HRA’s EEO Policy covers all HRA staff, clients, job applicants, and employment and training program participants.

AS A RESULT, EMPLOYMENT DECISIONS AT HRA SHALL BE MADE ON THE BASIS OF MERIT, FITNESS, EQUALITY OF OPPORTUNITY, AND FAIRNESS WITHOUT UNLAWFUL DISCRIMINATION ON THE BASIS OF ACTUAL OR PERCEIVED:

AGE	MARITAL STATUS	RACE
CAREGIVER STATUS ²	NATIONAL ORIGIN (ANCESTRY/ALIENAGE, CITIZENSHIP/IMMIGRATION STATUS)	RELIGION
COLOR	MILITARY STATUS	SEXUAL HARASSMENT
CONSUMER CREDIT HISTORY ³	PARTNERSHIP STATUS	SEXUAL ORIENTATION
CREED	PREDISPOSING GENETIC CHARACTERISTICS	STATUS AS A VICTIM OR WITNESS OF DOMESTIC VIOLENCE, SEX OFFENSES OR STALKING
DISABILITY	PRIOR RECORD OF ARREST/ CONVICTION ⁴	UNEMPLOYMENT STATUS
GENDER (SEX)		
GENDER IDENTITY		

¹ These laws include, but are not limited to: Title VII of the Civil Rights Act of 1964 (42 U.S.C. §2000e et seq.); New York State Human Rights Law (Article 15 of the New York State Executive Law); New York City Human Rights Law (§8-101 et seq., of the Administrative Code of the City of New York).

² The protected category of “caregiver status” was added to the New York City’s Human Rights Law on January 5, 2016, and took effect on May 4, 2016. A caregiver is defined as a person who provides direct and ongoing care for a minor child (under the age of 18) or a care recipient. A “care recipient” is defined as a person with a disability who is either a covered relative, or a person who resides in the caregiver’s household and who relies on the caregiver for medical care or to meet the needs of daily living. A covered relative is defined as a caregiver’s child, spouse, domestic partner, parent, sibling, grandchild or grandparent, or the child or parent of the caregiver’s spouse or domestic partner, or any other individual in a familial relationship with the caregiver as designated by the rules of the New York City Commission on Human Rights.

³ “Consumer credit history” was added as a protected category to the New York City Human Rights Law on May 6, 2015 and went into effect on September 3, 2015. Certain positions are exempt, such as police officers and peace officers. The New York City Commission on Human Rights has issued interpretative guidance (available on its website) on this law.

⁴ Employers must make a conditional job offer before inquiring into the criminal history of an applicant or conducting any criminal history search. If, after receiving information regarding the applicant’s record, the employer no longer wants to employ the applicant, the employer must explain why and provide a copy of the record. This explanation must take into account existing law that prohibits discrimination based upon criminal record. The position is then held open for three days so the employer and applicant can engage in an interactive discussion, considering the employer’s requirements and the applicant’s evidence of good conduct. This time also allows the applicant to question any inaccuracies on the record.

IT IS PROHIBITED TO ENGAGE IN DISCRIMINATORY CONDUCT BASED ON THE FOREGOING PROTECTED CLASSIFICATIONS WITH REGARD TO ALL TERMS AND CONDITIONS OF EMPLOYMENT, INCLUDING, BUT NOT LIMITED TO:

RECRUITMENT

TESTING

HIRING

WORK ASSIGNMENTS

TRANSFERS

SALARY AND BENEFITS

LEAVE

PERFORMANCE EVALUATIONS

PROMOTIONS

DEMOTIONS

TRAINING OPPORTUNITIES

DISCIPLINE

DISCHARGE

WORKING CONDITIONS

Where discrimination is suspected, employees are encouraged to use HRA's complaint and investigation procedures. Any person found to be engaging in discriminatory conduct or practices may be subject to discipline, including but not limited to, training, administrative warning, reprimand, suspension, probation, demotion, transfer, fine, termination, and/or any other measures calculated to eliminate unlawful or inappropriate behavior. In addition to pursuing disciplinary action, HRA may take appropriate action to address the impact that any violation of the EEO Policy has had on the complainant or others.

Staff, clients, job applicants, and employment and training program participants who believe they have been discriminated against may file a complaint with the EEO Office and/or contact the EEO Officer, an EEO Counselor or an EEO Liaison for advice. All complaints will be handled confidentially.

Managers and supervisors who become aware of conduct that may be unlawful and/or violates this policy must immediately, and without exception, report conduct or incidents to the EEO Office regardless of whether the apparent victim of the improper conduct wishes to make an EEO complaint. The failure of a supervisor or manager to report a potential violation of this policy to the EEO Office may be grounds for disciplinary action against the supervisor or manager.

→ To ensure that HRA is in compliance with the EEO laws, the EEO Office will conduct periodic reviews of HRA workplaces, documents, and employment decisions concerning HRA Staff.

THEORIES OF DISCRIMINATION

Disparate Treatment

Occurs when an employer intentionally treats an individual or group of individuals differently than similarly-situated individuals based on a reason prohibited by law and this policy. Such conduct is unlawful and a violation of the policy unless the employer can articulate a nondiscriminatory and legitimate job-related reason for the disparate treatment, which is not a pretext for such discrimination.

Mixed Motive

Occurs when an employer intentionally takes an adverse action against a member of a protected group for both legitimate and discriminatory reasons.

Harassment

Occurs when an employer engages in conduct that has the purpose or effect of creating an intimidating, hostile, or offensive work environment; has the purpose or effect of unreasonably interfering with an individual's work performance; or otherwise adversely affects an individual's employment opportunities. Harassment may include sexual harassment, as well as prohibited conduct based on protected characteristics, such as race, religion, national origin, etc.

Disparate or Adverse Impact

Occurs when an employer utilizes an employment policy or practice that appears neutral on its face but that has a disparate or adverse impact on individuals who are members of a protected category. Such policies or practices violate this policy and are unlawful unless the policy or practice is job-related and justified by business necessity. The focus of an inquiry based on a claim of adverse impact is

the consequence of the employment practice rather than the motive behind it. It is the *impact* of the behavior – *not the intent* – that is the issue in a claim of disparate or adverse impact.

Retaliation

Occurs when an employer takes an adverse action against an individual, or treats such individual negatively, because the individual filed an EEO complaint, cooperated in an EEO investigation, opposed discriminatory conduct, or engaged in other protected activity (e.g. requested a reasonable accommodation).

Failure to Reasonably Accommodate

Occurs when an employer is obligated to reasonably modify its work practices or environment for an employee, when requests are made in connection with disability, religion, victims or witnesses of domestic violence, sex offenses or stalking and/or pregnancy, childbirth or related medical conditions. An employer is not obligated to provide an employee with an accommodation where the employer can show that the accommodation would create an undue hardship on the operation of its business.

Association

Discrimination based on association occurs when an employer intentionally takes an adverse action against an individual, or treats such individual differently than others because of such individual's association with a member(s) of a protected group.

APPLICABILITY

Everyone who works at HRA, requests HRA services or who seeks employment with HRA is covered by federal, state, and local employment laws, and this Policy.

This includes all current employees, managers (including executives and senior level staff members), supervisors, co-workers, temporary workers, paid and unpaid interns,⁵ clients, job applicants, and employment and training program participants.

This Policy not only protects individuals from prohibited conduct because of their own protected status (such as their own actual or perceived race, religion, national origin, or disability), but also protects individuals from conduct motivated by the actual or perceived race, religion, national origin, or disability, etc., of other persons with whom they are associated. For example, this Policy applies to individuals who are subjected to adverse actions because of their marriage to, or domestic partnership or association with, persons of a particular racial, religious, or national origin group, or persons who have a disability. Moreover, discrimination based on an individual's name(s) or spouse's or domestic partner's name(s) that is associated with a particular racial, religious, or national origin group is prohibited.

These protections apply to actions, whether or not intentionally offensive or directed at a particular person or group, which violate this Policy. This Policy extends to conduct which occurs at any location that could be reasonably regarded as an extension of the workplace, such as any field location, off-site business-related social function, City vehicle, facility where City government business is being conducted and discussed, or social networking platform.

In addition, participants in HRA's employment and training programs for clients have a right to a workplace that is free of discrimination, including harassment based on race, color, national origin, religion, gender, disability, or age, and any basis that could otherwise be determined to be prohibited behavior pursuant to the Policy as applied to employees or applicants for employment.

All HRA employees, temporary workers, interns, and employment and training program participants are expected to be respectful of everyone in HRA's workplace and to members of the public, and to be sensitive to the effects of their behavior on those around them. All employees, temporary workers, interns, and employment and training program participants must be trained in the requirements of this Policy and must receive a copy of the EEO Policy Handbook, "*About EEO: What You May Not Know.*"⁶

⁵ On April 15, 2014, the New York City's Human Rights Law added the prohibition of discrimination against unpaid interns.

⁶ The New York City EEO Policy may be downloaded at <http://www.nyc.gov/html/dcas/html/about/eeopol>. The EEO Policy Handbook, "*About EEO: What You May Not Know,*" may be downloaded at http://www.nyc.gov/html/dcas/html/about/eoo_booklet.shtml.

SEXUAL HARASSMENT POLICY

Sexual harassment, which affects one's job, is a form of employment discrimination prohibited by law based on one's gender.

All HRA employees should familiarize themselves with the guidelines in this policy statement so that they will understand what type of conduct is prohibited and know the remedies available to anyone who has experienced sexual harassment.

Guidelines issued by the Equal Employment Opportunity Commission (EEOC) state that unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature constitute sexual harassment when:

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

These guidelines are not meant to interfere with voluntary social relationships between individuals in the workplace, but they do prohibit those actions and behaviors that are unwanted and unwelcome and/or which create an intimidating and hostile work environment.

There is a broad range of conduct by supervisors and co-workers which can, in certain circumstances, be considered sexual harassment. This

includes, but is not limited to, sexually suggestive remarks, sexually suggestive pictures, sexually suggestive gesturing, verbal harassment or abuse of a sexual nature, subtle or direct propositions for sexual favors and any unnecessary touching, patting or pinching.

Any manager or supervisor who knows of a sexually intimidating or hostile work environment or who becomes aware that the terms and conditions of an individual's employment are based upon submission to sexual conduct should refer to HRA's EEO Complaint Guidelines Procedure and/or consult with the EEO Office immediately. The failure of a supervisor or manager to report an allegation of this nature and/or a potential violation of this policy to the EEO Office may be grounds for disciplinary action against the supervisor or manager.

➔ **Any employee who believes that s/he is being sexually harassed may report such conduct to their EEO Liaison, manager(s)/ supervisor(s) or directly to the EEO Office. Advice and counseling concerning the EEO complaint process may also be obtained from an EEO Liaison or a manager/ supervisor, who are responsible for immediately reporting sexual harassment incidents to the EEO Office for review.**

ANTI-RETALIATION POLICY

It is unlawful and a violation of this policy to retaliate against or harass any person for filing an EEO complaint, cooperating in an EEO investigation, opposing discrimination, or engaging in other protected activity, such as requesting a reasonable accommodation. The Human Resources Administration will not tolerate any such retaliation. Employees must refrain from subjecting individuals to threats, reprimands, negative evaluations, harassment, or denying reason-

able requests to visit the EEO Office during business hours, or engaging in other adverse treatment that may have the effect of discouraging individuals from utilizing the EEO process. Any employee who engages in such retaliation or harassment may be subject to discipline, which may include reprimand, suspension, probation, demotion, transfer, fine, termination, etc.

Any person who believes that s/he is being retaliated against for such protected activity should file a complaint with or otherwise report such conduct to the EEO Office. A supervisor or manager who becomes aware of possible retaliation must notify the EEO Office immediately. Failure of a supervisor or manager to immediately report potentially retaliatory conduct to the EEO Office may be grounds for disciplinary action.



POSTING OF EEO POLICY NOTICES

All HRA premises must have the EEO Policy Notices regarding General Anti-Discrimination and Sexual Harassment posted in accessible and clearly visible locations. Some workplaces may require multiple notices posted throughout the relevant sites. Supervisors are responsible for ensuring that all workplaces under their supervision post notices in a conspicuous location and maintain any and all required notices.

EEO COMPLIANCE INSPECTIONS

Employees are prohibited from having offensive items in the workplace. The EEO Officer is mandated by the Citywide EEO Policy and the applicable laws to ensure compliance with the HRA EEO Policy. As such, the EEO Office conducts compliance inspections of all HRA premises. No advance notice is required and no HRA area is off limits for purposes of such inspection. Any material found on any HRA premises that violates the EEO Policy will be photographed, immediately removed, and confiscated by the EEO Office representatives. Supervisors are required to ensure that workplaces under their supervision are in compliance with the EEO Policy and understand that the failure to do so may result in disciplinary action. Employee cooperation is required and any employee who interferes with compliance inspections may be subject to discipline.

EEO TRAINING PROGRAM

The HRA equal employment opportunity efforts are strengthened by educating employees about EEO laws, the HRA EEO Policy, and employees' individual responsibilities and rights under the EEO Policy. To achieve its goals, the EEO Office shall:

- 1 Conduct new employee orientation programs that include a discussion of HRA EEO Policy, employees' rights and responsibilities under the policy, working in a culturally diverse workforce, and the discrimination complaint and investigation procedures.
- 2 Conduct ongoing and periodic EEO training for all personnel, supervisory and non-supervisory alike, consisting

of the subject areas set forth above. This training shall be carried out agency-wide, focusing immediate attention on bureaus and/or units that have been the subject of discrimination complaints.

- 3 Conduct specialized training upon request to units within HRA. The goal of this proactive training is to focus on the issues and situations particular to those units.
- 4 Maintain all EEO training documentation, lesson plans, evaluations, and training statistics.

COMPLAINT AND INVESTIGATION PROCESS

Complaint Reporting/Intake

When an employee, client, job applicants, and/or employment and training program participant believes that s/he has been a victim or witness of discrimination, sexual harassment or retaliation, they have a number of options available to report an EEO violation. S/he may:

- A. File a complaint with the EEO Office, in person, by mail, or by phone. (All complaints will eventually be reduced to writing.) (See Addendum 1); or
- B. Inform his/her supervisor about the complaint or that s/he wants to file an EEO complaint. Employees are not required to inform their supervisors about the nature or specifics of the complaint. Supervisors are obligated to advise employees of their filing options with the EEO Office, and must report the EEO matter to the EEO Office whether or not the employee intends to file a complaint. Supervisors and other employees cannot engage in "off the record" conversations. Supervisors are to be guided by this policy for responsibilities and reporting instructions; or
- C. File an anonymous complaint with the EEO Office. Anonymous com-

plaints are accepted provided that the complainant states enough information (names, times, places, events, actions, etc.) to allow the EEO Office to take appropriate action; or

- D. Seek the assistance of a Human Resource Business Partner concerning the EEO complaint process, if appropriate; or
- E. Seek the assistance of an EEO Liaison concerning the EEO complaint process, if appropriate. EEO Liaisons are employees who have received specialized training in EEO matters and work closely with the EEO Office; or
- F. File a complaint with a Fair Employment Practices agency. The EEO Office will advise the employee of his/her right to file a complaint with the relevant civil rights law enforcement agency such as the New York City Commission on Human Rights, the New York State Division of Human Rights, the United States Equal Employment Opportunity Commission or any other relevant agency.

NOTE: EEO Complaints must be filed with HRA's EEO Office within 1 year of the alleged incident.

Pre-Investigation Review

If a complaint is filed with the EEO Office, the EEO Office will review the complaint and make a decision to accept or reject the complaint. The criteria used in making this decision include whether the person making the complaint alleges a violation of the EEO Policy based on one or more protected characteristics to which the person belongs and whether the complaint is employment-related. If the complaint is rejected, the EEO Office will so inform the complainant.

Investigation

If the complaint is accepted, an EEO Counselor will meet with the complainant (if s/he has not already been interviewed), and will separately interview all other relevant parties, including the respondent. The EEO Counselor will gather facts based on those interviews and any other relevant evidence and determine if the EEO complaint is valid (i.e., that there is reasonable cause to believe that the EEO Policy has been violated). Any person who is interviewed during the course of an EEO investigation has a right to be accompanied by a representative of his or her choice. This includes individuals who make complaints, persons against whom complaints were made, or witnesses. It is preferable that the EEO Office receive advance notice that the person who is being interviewed will be bringing a representative.

Any person who is the subject of the complaint will have an opportunity to respond in writing. All employees are expected to cooperate with EEO investigations. Failure to cooperate in an investigation may result in disciplinary action.

Findings and Recommendation

The EEO Counselor and/or the EEO Officer summarize the facts of the investigation into a report. The EEO Counselor and/or the EEO Officer then make a recommendation with regard to the allegations. The EEO Officer then submits the investigation report to the Commissioner. Where a violation of the EEO Policy is substantiated, remedial action will be recommended, which may include EEO training, an administrative warning, or disciplinary action for the violator(s). Where a violation is unsubstantiated, but there are still concerns about comments and/or actions that the EEO Office deems unfair

or inappropriate, the EEO Office will make appropriate recommendations to address those concerns.

Commissioner's Determination

The Commissioner and General Counsel review the findings and recommendations made by the EEO Office. The Commissioner may approve the findings and recommendations and, if warranted, may direct that disciplinary action be pursued consistent with the due process rights of the respondent employee. The parties are informed in writing of the final determination and the complainant will once again be made aware of his/her filing options with external agencies.

ACCOUNTABILITY

All HRA employees play an important role in ensuring compliance with the EEO Policy. Those roles are as follows:

Commissioner

The Commissioner holds and will continue to hold the EEO Office, Human Resources professionals, managers, and supervisors accountable for effective implementation of New York City's EEO policies and to ensure fair employment practices. The Commissioner requires that all employees attend training to understand their EEO-related responsibilities to the agency and each other. The Commissioner appoints the EEO Officer, who must report directly to the Commissioner. The Commissioner will review and sign all EEO plans and complaint resolutions. The Commissioner and/or the EEO Officer will continue to review agency practices, policies, programs, and procedures regarding recruitment, discretionary hiring, applicant selection (including structured interviewing), compensation, promotions, demotions, transfers, training, separations, and EEO-related

compliance with directives of government agencies.

EEO Officer (EEO Office)

The EEO Office has an obligation to investigate complaints of discrimination, harassment, retaliation or other violations of this policy that the EEO Officer becomes aware of, and must recommend remedial action to address the effects of violations of this policy. The EEO Officer, either directly or indirectly through the EEO Counselors, will investigate EEO complaints in accordance with the following guidelines.

S/he shall:

- ✔ Notify the complainant of all filing options available pursuant to the complaint process.
- ✔ Upon receipt of a potential EEO Incident Report, acknowledge receipt to the Supervisor or Manager who sent the report.
- ✔ If a complaint is not within the jurisdiction of the EEO Office, inform the complainant of such and, if appropriate, refer the complaint to the appropriate bureau (e.g., Office of Staff Resources, Labor Relations, or the respective Unit supervisor) for necessary action in accordance with the applicable HRA policies, rules, regulations and/or collective bargaining agreements.
- ✔ Initiate an investigation into the complaint. Notify and interview relevant parties, review relevant documents, and take appropriate steps to complete the investigation.
- ✔ Prepare a memorandum addressed to the Commissioner, setting forth the specifics of the complaint, the extent and findings of the investigation, and recommendations for resolution of the complaint.
- ✔ Notify relevant parties of the EEO Office's final determination with respect to the complaint. However, notifications of determinations are generally not given to witnesses.

Human Resource Business Partner

Human Resource Business Partners have primary responsibility for assisting the agency head in implementing the City's personnel policies and shall be knowledgeable regarding the interplay of EEO-related laws and other work-related statutory schemes, including, but not limited to, the Americans with Disabilities Act, the Family Medical and Leave Act, the Civil Service Law, and the Workers' Compensation Law. Human Resource Business Partners must cooperate with the EEO Office/Officer in the implementation of EEO policies and standards, including training objectives, complaint resolutions, and the modification of agency procedures to ensure equal employment opportunity for applicants and employees.

Human Resource Business Partners will also: **1)** ensure that all employees are made aware of the identity of the agency career liaison and ensure that all employees have access to information regarding job responsibilities, performance evaluation standards, examinations, training opportunities and job postings; **2)** inform the EEO Office of all new hires and promotions, as well as other employment actions, to ensure that new employees and promotes are advised of the EEO policies and the discrimination complaint procedure; **3)** involve the agency EEO Officer in the review of EEO-related decisions, actions, and practices; and **4)** promptly consult with the agency's EEO Officer if s/he knows, has been informed of, or suspects, a violation of the EEO Policy has occurred.

Employees

All Human Resources Administration employees shall cooperate fully with the EEO Office when an EEO investigation or inspection is being conducted or when the EEO Office is inquiring about a matter. It shall be the respon-

sibility of the employee to answer fully and truthfully all questions asked by the EEO Office and provide requested and/or relevant documents immediately and access to worksites.

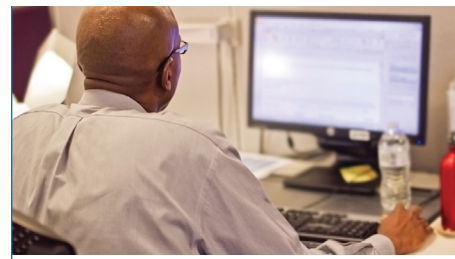
An employee has a right to meet privately with the EEO Officer or an EEO Counselor during office hours; however, the employee should obtain approval to do so prior to leaving his/her work assignment. An employee need not disclose to a supervisor the details of, or the purpose for, meeting with an EEO Office representative. Reasonable leave requests to meet with an EEO Office representative during work hours cannot be denied by supervisors. Managers and supervisors shall allow employees to meet with EEO Office representative at the earliest practicable time consistent with the operational needs of their units. Concerns about the above should be immediately addressed to the EEO Office.

An employee may bring a representative of his or her choice to the meeting, provided that advance notice is given to the EEO Office. Depending on the circumstances, the EEO Office reserves the right to exclude individuals from EEO meetings.

Managers/Supervisors/Officers

Managers, supervisors and officers must make every effort to maintain a work environment that fosters sensitivity and respect for the diversity of all individuals. Specifically, each manager, supervisor and officer shall:

- ✔ be accountable to the Commissioner and EEO Officer for effectively implementing EEO-related policies;
- ✔ perform managerial or supervisory responsibilities in a non-discriminatory manner, especially during evaluations and recommendations of subordinates;
- ✔ receive training in EEO laws;
- ✔ cooperate with the EEO Officer in



the implementation of EEO policies and standards including, but not limited to, training; complaint resolutions; processing, recording and reporting reasonable accommodation requests; EEO-related recruitment and selection standards; and modifying agency procedures to ensure equal employment opportunity for applicants and employees;

- ✔ promptly report to the agency's EEO Office if he or she observes, learns about, or suspects that a violation of this policy has occurred;
- ✔ where appropriate, encourage subordinates to consult with the EEO Office;
- ✔ allow employees to meet with EEO representatives at the earliest practical time consistent with the operational needs of his or her unit;
- ✔ maintain confidentiality with respect to EEO-related matters; and
- ✔ be evaluated on compliance with the above.

As stated above, managers, supervisors, and officers are required to immediately inform the EEO Office of all complaints or incidents of discrimination, sexual harassment, or retaliation that they become aware of or observe. If an employee informs a manager, supervisor or officer of an incident, the supervisor or officer shall inform the employee of his/her available filing options with the EEO Office. The employee is not required to give the manager, supervisor or officer or any other Human Resources Administration official, except the EEO Officer and EEO Office representatives, any

information other than the fact that a complaint is being made.

The manager, supervisor or officer shall not interrogate any individual involved in the alleged incident, initiate an investigation into the alleged incident, or discourage an employee from filing a complaint. If the manager, supervisor or officer is unsure of whether the complaint raises an EEO issue, s/he must call the EEO Office at (929) 221-5139 for guidance.

Upon learning of an alleged incident of discrimination, the manager, supervisor or officer is required to immediately submit an EEO Incident Report containing all information he/she possesses regarding the incident, regardless of whether the employee intends to file a complaint.

The EEO Incident Report shall be submitted directly to the EEO Office via e-mail or fax and shall not be retained in a separate file by the manager, supervisor or officer. The EEO Office shall notify the reporting supervisor of receipt of the Incident Report. If necessary, the manager, supervisor or officer may contact the EEO Office for further guidance at any time during the preparation of an EEO Incident Report.

Managers, supervisors or officers should always keep in mind that details of EEO complaints shall not be discussed with anyone except the EEO Office and must not be documented in separate files, journals, logs, or any unit record or document other than in the records maintained by the EEO Office.

EEO Liaisons


The actions to be taken by an EEO Liaison when an employee contacts him/her and requests to discuss a situation that is perceived as an

EEO-related problem shall consist of the following:

- A.** Explain the meaning of confidentiality as the first order of business and advise the employee that the EEO Liaison has an obligation to notify the EEO Office if he/she learns of any potential EEO violation. This obligation to notify the EEO Office exists whether the EEO Liaison learns of a violation directly or indirectly.
- B.** Inform the employee of available filing options and the statutory time periods for the timely filing of charges of discrimination and give the employee a copy of the EEO Complaint Form.
- C.** If the employee elects to voluntarily discuss the details of the complaint, refer the employee directly to the EEO Office. The EEO Liaison shall offer to help set up an appointment for him/her with the EEO Office and ask if the employee would like the EEO Liaison to accompany him/her to the EEO Office.
- D.** Forward all information gathered during the conversation with the employee to the EEO Office (See Addendum 2 for the EEO Incident Report Form). The EEO Liaison shall not interrogate any individual involved in the alleged incident or initiate an investigation. The EEO Liaison will not retain or maintain copies of any information or records, including the EEO Liaison's intake report.
- E.** Maintain confidentiality of all EEO-related information, especially during the transmission of such information to the EEO Office.
- F.** If a manager/supervisor/officer contacts an EEO Liaison for general guidance, the EEO Liaison shall inform managers/supervisors/officers about their obligations to file an EEO Incident Report with the EEO Office immediately upon learning of an EEO incident.
- G.** Inform the employee, manager(s), supervisor(s) and/or officer(s) that journal/log entries or statements shall

not be taken with regard to any details of an EEO complaint other than those taken by the EEO Office.

- H.** Be guided by instructions received from the EEO Office.
- I.** Remain impartial in circumstances where s/he has some involvement or knowledge of the EEO case.
- J.** Will not attempt to obtain information from or influence the EEO Office about any EEO case, including when the EEO Liaison is the subject.

 **All EEO Liaisons are responsible for protecting the confidentiality of EEO-related documents, and must take all reasonable measures to ensure such confidentiality. EEO Liaisons must also avoid any disclosure of the identity of the complainant, respondents, and witnesses, or any information regarding the complaint to anyone other than a representative of the EEO Office. The EEO Liaison must forward the EEO Incident Report directly to the EEO Officer via e-mail, fax or in a sealed envelope. Any Liaison who violates these rules may be subject to disciplinary action and be relieved of their EEO Liaison responsibilities.**

CONFIDENTIALITY OF COMPLAINTS/RECORDS/DOCUMENTS

In order to protect the confidential nature of the EEO complaint process, employees do not have to report their complaints directly to their supervisors. Employees may file a complaint directly with the EEO Office. In general, EEO matters are confidential. However, EEO representatives may disclose EEO-related information to individuals on a need-to-know basis. For example, such disclosure may arise in order for HRA to conduct a thorough investigation, to properly remedy the effects of discrimination or harassment, or to address immediate workplace dangers.

All HRA personnel involved in the investigation of an EEO complaint are required to maintain confidentiality and shall avoid the disclosure of the identity of the complainant, respondent(s), witness(es), and any information regarding the complaint. No individual involved in the complaint shall discuss the investigation with workplace colleagues or friends. The aforementioned must be adhered to in order to protect the integrity of the EEO complaint process. Supervisors may, under limited circumstances, have a need to disclose complaint details to address immediate workplace dangers. This disclosure shall only be done in consultation with the EEO Office. Unnecessary disclosure of EEO information is a violation of this policy and can lead to disciplinary action for breach of confidentiality.

All documents related to an EEO complaint or investigation shall be treated confidentially and shall be retained by the EEO Officer. Details of EEO complaints and incidents shall not be recorded in journals, logs, or workplace documents other than in the records of the EEO Office. No document or other information shall be released to any third party without the written consent of the parties, except as authorized by law or set forth by the guidelines and procedures implementing the EEO Policy.

Medical Information/Records

The law requires that medical records be maintained separately from general personnel files and treated as confidential except under narrow circumstances, such as informing a supervisor about a necessary restriction or accommodation. This requirement protects an individual regardless of whether s/he has a disability.

COMPLAINT FILING OPTIONS AND DEADLINES

Any applicant or employee (former or current) who believes that s/he has experienced discrimination may file a formal complaint with the EEO Office. S/he may also file an external complaint with the Federal, State, and local agencies listed below. A person does not give up the right to file externally when s/he files a complaint with the EEO Office.

The following Federal, State, and local agencies enforce laws against discrimination. All agencies, including the EEO Office, have respective deadlines by which HRA EEO complaints must be filed (see statutory time periods chart below).

AGENCY	FILING DEADLINE	ADDRESS
HRA EEO Office	One Year (Human Resources Administration EEO Policy)	150 Greenwich Street, 42nd Floor New York, NY 10007 Tel: (929) 221-5139 Fax: (212) 437-2162
New York City Commission on Human Rights (NYCCHR)	One Year (NYC Administrative Code, Title 8, Chapter 1, Section 8-109(e))	40 Rector Street, 10th Fl. New York, NY 10006 Tel: (212) 306-7450 www.nyc.gov/html/cchr
New York State Division of Human Rights (NYS DHR)	One Year (New York Executive Law, Article 15, Section 297(5); see also Section 297(9))	One Fordham Plaza, 4th Fl. Bronx, NY 10458 Tel: (718) 741-8400 or 55 Hanson Place, Rm. 1084 Brooklyn, NY 11217 Tel: (718) 722-2385 or www.dhr.ny.gov
United States Equal Employment Opportunity Commission (EEOC)	180 Days - From the day the discrimination took place. Otherwise, 300 Days - If a state or local agency enforces a law that prohibits employment discrimination on the same basis.*	33 Whitehall Street, 5th Fl. New York, NY 10004 Tel: 1-800-669-4000 Fax: (212) 336-3790 TTY: 1-800-669-6820 www.eeoc.gov

**Please contact the EEOC for more specific information.*

When a person files an external complaint with a Federal, State or local administrative agency based on or related to the same facts and circumstances of an internal complaint, the agency EEO Officer will transfer the matter to the agency General Counsel's Office, who will be responsible for any further handling of the matter. The EEO Officer will notify the complainant and the parties who are the subject of the complaint, in writing, that the EEO Office's investigation has been transferred due to the filing of an external complaint. The General Counsel's Office will be responsible for handling external complaints regardless of the timing of such complaints. The transfer of the complaint to the agency General Counsel's Office should in no way preclude the EEO Officer from cooperating with the General Counsel's Office with respect to the ultimate resolution of the complaint.

MEDIATION/ALTERNATIVE DISPUTE RESOLUTION

Mediation is a voluntary process that parties may use in an EEO dispute or workplace conflict in order to resolve the dispute or conflict. The mediation process is generally described as follows: A complainant in an EEO action may file a written request for mediation (attached as Addendum 3 to this EEO Policy). Also, on a case-by-case basis, the EEO Office may recommend or refer a complaint for mediation. The EEO Office will determine if such mediation is to be conducted internally or externally. Internal mediations are facilitated through the Office of Conflict Resolution.

HRA's Office of Conflict Resolution is a new initiative. Its primary goal is to focus proactively on resolving workplace disputes through conflict resolution. The Office of Conflict Resolution will provide a platform of education, awareness and training for managers and supervisory staff to help them identify early conflicts in the workplace and appropriately develop solutions for the concerns raised prior to formal disciplinary intervention. Conflict Resolution promotes a balanced and structured environment for people to listen to and understand each other, so they can reach mutual agreements that help improve work relationships and working conditions. A referral for mediation services can be made by managers, supervisors, and union representatives.

The Office of Conflict Resolution staff collaborates with managers and supervisors to develop resolutions and provide recommendations for solutions

to addressing difficult and sensitive situations employees are experiencing. Every individual case and/or situation poses different and unique circumstances. The Office of Conflict Resolution is adept at determining what to refer to mediation and resolving problems.

External mediation proceedings are facilitated through the NYC Center of Creative Conflict Resolution.⁷ The complainant and respondent must agree to the mediation and, if mediation is successful, the parties must also agree to the resolution of the conflict. In conducting mediations, the mediator shall consult with the complainant, respondent, and other persons, as appropriate. The mediator's role is to remain impartial and to facilitate a discussion designed to help the parties reach a mutually satisfactory resolution of their dispute. Mediation is confidential.

For internal mediations, the EEO Office will issue a written report confirming the results of the mediation. For external mediations, the mediator will inform the EEO Office of the results of the mediation.

Successful mediation may include an exchange of apologies, a clarification of job responsibilities, or a plan for dealing with future conflict. When a resolution is agreed upon, the complainant and respondent, and any other necessary party, must sign a Mediation Resolution Agreement.

When a resolution is not agreed upon and/or the mediator and/or the EEO Office determine that further mediation efforts would be unproductive, the parties will receive a written notice confirming termination of mediation and informing the complainant of his/her right to request resumption of the investigation of the complaint of discrimination.

If an EEO investigation resumes, the Complainant and Investigation Process shall govern the handling of the dispute.

Withdrawal of Complaint

A complaint of discrimination may be withdrawn by the complainant under limited circumstances (See Addendum 4). Prior to making the determination to end the investigation, the EEO Officer must assess whether evidence has been found which requires the agency to take corrective action to prevent or eliminate a violation of this policy or other inappropriate situation. If there is such evidence, the EEO Officer must continue the investigation until s/he is prepared to make a recommendation as to corrective action. If no evidence exists, then the complaint may be withdrawn. In either event, the EEO Officer shall notify the complainant in writing about the determination of the request to withdraw the complaint. If the determination is to accept withdrawal of the complaint, the EEO Officer shall notify the relevant parties that the investigation has been terminated.

MEDIATION MAY RESULT IN THE FOLLOWING:

- ✓ The complaint is withdrawn; or
- ✓ A resolution is agreed upon by the complainant and respondent and, if the terms of the resolution require agency action, by the head of the agency or his/her designee; or
- ✗ The mediator and/or the EEO Office deem mediation efforts unproductive.

⁷ The Center is a conflict resource center for New York City government, its agencies, employees, unions and the public they serve. It is housed in NYC's Office of Administrative Trials and Hearings. The Center helps find creative, collaborative, fair and cost efficient responses to conflicts involving the City. Through these efforts, the Center seeks to transform the harmful potential of conflict into opportunities for improved communication, enhanced relationships, greater public trust and positive change.

REASONABLE ACCOMMODATION POLICY

In compliance with applicable Federal, State and local laws, and consistent with the New York City EEO Policy, HRA is committed to a policy of equal employment opportunity for qualified employees and job applicants. HRA may be required to provide reasonable accommodations when requests are made in connection with disability, religion, victims or witnesses of domestic violence, sex offenses or stalking and/or pregnancy, childbirth or related medical conditions. The reasonable accommodation process should be flexible and interactive, and may involve an exchange of information, and ongoing communication between agency representatives and the individual who is requesting a reasonable accommodation. In all instances, the agency EEO Officer should be notified of the request in order to facilitate discussions, research appropriate accommodations and assist in the resolution of the matter.

Disability



Federal, State and local laws, as well as the New York City EEO Policy, prohibits adverse employment actions based on a person's disability. Disabilities are any physical, medical, mental or psychological impairments of any system of the body. HRA will provide reasonable accommodations for qualified employees and job applicants with disabilities unless they impose an undue hardship on the agency.

“Reasonable accommodations” are modifications or adjustments to the application process, work environment or to the manner or circumstances under which a task is customarily performed that promotes equal employment opportunity for an individual with a disability.

A reasonable accommodation enables a qualified employee or job applicant with a disability to be considered for a position, perform its essential functions, or enjoy benefits and privileges of employment that are equal to those enjoyed by similarly situated individuals without disabilities. A “qualified employee or job applicant” is an individual with a disability who satisfies the requisite skill, experience, education and other job-related requirements for a position and who, with or without reasonable accommodation, can perform the essential functions of that position.

“Essential functions” are duties fundamental to a position, such as those for which the position exists. Evidence of what constitutes an essential function includes, but is not limited to, the following: the employer's judgment; written job descriptions; the amount and/or proportion of time spent performing the function; the degree of expertise or skill required to perform the function; the number of other employees available to perform the function or among whom the performance of the function can be distributed; the consequences of not requiring an employee to perform a function; the terms of a collective bargaining agreement; and the actual work experience of present or past employees in the job.

Accommodations are not reasonable if they impose an undue hardship on the agency. An “undue hardship” is any action that is unduly costly, extensive, substantial or disruptive or would fundamentally alter the nature or operation of the program or business. The determination on whether a specific request for an accommodation is reasonable generally depends upon the circumstances of each situation, and is reviewed on a case by case basis. Among the factors to be considered in determining whether an accommoda-

tion is an undue hardship are the cost of the accommodation, the employer's size, financial resources and the nature and structure of its operation. Some examples of accommodations which have been found reasonable, under certain circumstances, include the following: job restructuring, making facilities physically accessible to and usable by persons with disabilities; modifying work schedules; providing equipment or devices; and providing auxiliary aides and services.

Wellness rooms are provided as accommodations under this category and may be reserved, where applicable. See §G below. Requests for these rooms could involve the need for an employee to administer medication and/or use medical equipment, among other things.

Religion

Federal, State and local laws, as well as the New York City EEO Policy prohibits adverse employment actions based on a person's religion. This includes discriminatory practices and decisions, harassment, hostility or other adverse actions because of a person's creed, religious affiliation, or religious beliefs, observances or practices.

In addition, depending on the circumstances, agencies must try to reasonably accommodate the religious observances, beliefs or practices of an employee or applicant, unless the accommodation imposes an undue hardship. A reasonable accommodation for religion may be a change in a workplace rule or practice that allows an individual to respect his or her religious beliefs, observances or practices. City agencies may be required to provide accommodations for religion such as: flexible arrival and departure times; leave; voluntary exchanges of shifts or assignments; time and/or place to pray; accommodations relating to appearance and dress; and modifying

workplace practices, policies and/or procedures.

An employee or applicant requesting a reasonable accommodation based on religion may make such a request to his or her manager or supervisor, agency personnel or directly to the agency EEO Office via the HRA e-form system.

Religious observances fall under this category. Also, wellness rooms are provided as accommodations under this category and may be reserved, where applicable. See §G below. Requests for these rooms could involve the need for an employee to pray during working hours, among other things.

Victim or Witness of Domestic Violence, Sex Offenses or Stalking

The New York City EEO Policy prohibits employment discrimination against persons who are victims or witnesses of domestic violence, sex offenses or stalking. Agencies shall provide reasonable accommodations that do not create undue hardship and that enable such persons to satisfy the essential requisites of a job, provided that the status as a victim or witness of domestic violence, sex offenses or stalking is known, or should have been known, by the agency.

A reasonable accommodation for a victim or witness of domestic violence, sex offenses or stalking may include an adjustment to a job duty, workplace facility, or work requirement, including a transfer, reassignment or modified schedule, leave, a changed telephone number or seating assignment, installation of a lock, or implementation of a safety procedure, in response to actual or threatened domestic or sexual violence.

Pregnancy, Childbirth or Related Medical Conditions

Federal law and the New York City EEO Policy prohibit discrimination against pregnant women. New York City combats this form of discrimination by requiring employers to provide reasonable accommodations to pregnant women and those who suffer medical conditions related to pregnancy and childbirth. Agencies must reasonably accommodate an employee's pregnancy, childbirth, or related medical conditions that enable such persons to perform the essential requisites of a job, provided that (i) the pregnancy, childbirth or related medical condition is known or should have been known by the Agency and (ii) such accommodation does not cause undue hardship in the conduct of the Agency's business.

Wellness rooms are provided as accommodations under this category and may be reserved, where applicable. See §G below. Requests for these rooms could involve the need for an employee to express breast milk, among other things.⁸

Certification

Agencies may require a person requesting a reasonable accommodation to provide certification based on any of the characteristics mentioned above. The person requesting the reasonable accommodation shall provide a copy of such certification to the agency within a reasonable period after the request is made. Depending on the category for which an accommodation is sought, a person may satisfy the certification requirement by providing documentation from an employee, agent, or volunteer of a social services organization, an attorney, a member

of the clergy, or a medical or other professional service provider assisting the individual seeking a reasonable accommodation, or that individual's family or household member. Agencies may also request documentation that an individual has sought assistance in addressing domestic violence, sex offenses, or stalking and the effects of the violence or stalking; a police or court record; or other information consistent with the disclosure and the request for accommodation.

All information, including documentation and/or records, which reflect the fact that the individual has requested or obtained a reasonable accommodation, shall be retained in the strictest confidence by City agencies, except to the extent that disclosure is requested or consented to in writing by the person requesting the reasonable accommodation, or is otherwise required by applicable federal, state or local laws.

Online Reasonable Accommodation Requests (E-Form)

Qualified employees seeking reasonable accommodations can submit a request through the **Employee Online Requests** application. A manager or supervisor may also initiate the Reasonable Accommodation Request on behalf of an employee. This application can be accessed through a link on the HRA Home Page, under the "**My Forms**" tab.

To access this application, staff members will simply click the Employee Online Requests application link. The system will automatically recognize a staff member by the log-in ID he or she uses to access the HRA network; no separate log-in to this program will be required (except for OCSE employ-

⁸ Monthly, or upon request, the Office of Staff Resources' Employee Relations and Services Unit will send the EEO Office a Childcare Report. This Report includes pertinent employee information and denotes the leave status and return to work date. An employee returning to work after a child care leave, and who requests a reasonable accommodation to express breast milk in a wellness room, will be included in the Report. This inclusion serves as the verification of the child's birth.

ees, who will be prompted to enter their HRA network ID and password before they can access the system).

Once in the application, a list of the currently available Employee Online Request forms will be visible. By clicking on the Reasonable Accommodation form link, employees can access it to complete and submit it on-line. Once a form has been selected, it will populate with certain information based on the employee's log-in ID, such as full name and work location. Staff will simply need to enter the remaining required information on the form, confirm that all of the information is correct, and click 'Submit'.

➔ **If the request involves a device, equipment or furniture to be purchased by the agency, the following materials must be attached to the form, or faxed to the EEO Office at (212) 437-2162:**

- 1 **Medical documentation, which includes a recommendation for the accommodation, and indicates the following information (See Addendum 5 for the Reasonable Accommodation Supplemental Questionnaire):**

The specific nature of the condition;

Identifies, in detail, the limitations of what the employee is and is not able to do, because of his or her condition;

The type of modifications or equipment that are necessary, and how the modification(s) will help the employee to perform the essential functions of their position;

The duration of the employee's condition.

- 2 **A product research listing (i.e. suggested manufacturers and prices), if available.**

The Employee Online Requests application will forward the request (without any attached documentation) to the employee's immediate supervisor. Within ten (10) business days of receipt via e-mail, the supervisor or manager must take action on the request, by choosing to recommend approval or to recommend disapproval. Once the supervisor has taken action on the request, the Employee Online Requests application will automatically forward the request to the EEO Office for their final decision. **Even if the supervisor recommends disapproval, the request will still move on to the EEO Office for their final review.**

In the event that the supervisor is unable to or does not act on the request within ten (10) business days, the EEO Office will receive notification automatically via the Employee Online Requests application, and act on the request directly, without input from the employee's supervisor. The employee, the employee's supervisor, and the employee's HRBP will receive email updates as the request moves through the review process. If the employee's request is approved, the EEO Office will work with relevant program areas to implement the accommodation. General information and further instructions can be obtained from the EEO Office or from the EEO link on the HRA homepage.

Upon completion of the application process, the EEO Office will render a determination and the employee will be notified of the determination in writing within 30 days. If the employee objects to the determination, the employee may file an appeal to the Commissioner on the applicable appeal form (See Addendum 6) within fifteen (15) days of the date of the notification of the determination. A copy of the appeal form must also be submitted to the EEO Office. **Within fif-**

teen (15) business days of receipt of an appeal, the Commissioner or his or her designee shall:

- 1 Obtain the employee's or applicant's request for reasonable accommodation and review all related documentation, standards, procedures and potential accommodations;
- 2 Meet and/or consult with the employee or applicant, the EEO Officer, and any agency representative that the agency head deems necessary to the reasonable accommodation request;
- 3 Evaluate the reasonableness of employee or applicant and supervisor preferences regarding the accommodation request, giving primary consideration the employee's or applicant's preferences; and
- 4 Consult with the Office of Citywide EEO or the Law Department.

Within fifteen (15) business days of receipt of the appeal, the agency head shall issue a written determination on the request for reasonable accommodation, specifying what appropriate accommodation shall be provided, if any, and, where necessary, directing the appropriate agency representative to implement an accommodation promptly. The EEO Officer shall monitor implementation of the reasonable accommodation. The written determination of the Commissioner or his/her designee shall serve as a final and binding agency action on the reasonable accommodation request.

Reasonable accommodations may be periodically reviewed and modified, and employees may be required to submit updated documents to support their need for continued accommodations. An employee or job applicant who has received a reasonable accommodation because of their status as a victim or witness of domestic violence, sex offenses or stalking shall promptly advise the EEO Office in the event that his or her status or need for the accommodation ends.

WELLNESS ROOMS

In applicable locations, HRA allows qualified employees to book Wellness Rooms for special needs in order to be accommodated. Wellness Rooms are provided as accommodations for requests involving Disability, Religion and Pregnancy, Childbirth or related Medical Conditions and can be reserved for fifteen (15) minute intervals. Once approved, the EEO Office will contact Management Information Systems (MIS) and inform them to authorize the requesting employee to reserve a Wellness Room through Microsoft Outlook. MIS will maintain an ongoing list of authorized users for applicable locations. General

Support Services (GSS) will provide the EEO Office with the Wellness Room entrance code(s) for all applicable locations.

In its Reasonable Accommodation determination correspondence letter with the requesting employee, the EEO Office will provide the employee with the Wellness Room code for their specific location. GSS will update the EEO Office of any changes to the code(s), as needed. Wellness Rooms are for the sole use of the requesting employee. Unauthorized distribution of the code is strictly prohibited. Unauthorized use of the Wellness Rooms and/or distribution of the code(s) could result in disciplinary action. Building Managers and/or

Supervisors will periodically monitor the use of the Wellness Rooms to ensure appropriate use. Information involving unauthorized use of the Wellness Rooms and/or distribution of the code(s) will be forwarded to unit supervisors and program heads for appropriate action. After receiving approval for a reasonable accommodation request involving the use of a Wellness Room, employees should follow the steps below to secure the room. If an employees' building does not have a Wellness Room, please contact the EEO Office's Reasonable Accommodation Coordinator to discuss other options.

Please follow the steps below to secure a Wellness Room:

STEPS FOR SECURING A WELLNESS ROOM

- 1 Open Outlook.
- 2 Select Calendar from the left-hand taskbar. Click New Meeting and select New Meeting. (Image 1)
- 3 Enter the subject and select Starting Date and Time along with the Ending Date and Time for which you want to schedule the meeting.
- 4 Select Scheduling Assistant, Click Add Rooms, Select the Room you want to Book and then Click OK. (Image 2)
- 5 Available timeslots will be blank. Booked timeslots will be shaded. Make selection then Click Send. (Image 3)
- 6 After sending request, return to Outlook e-mail. Employees will receive one of the following e-mails based on three conditions:

CASE A



You have permission to book the Room and the Room is available.

Employees will receive an e-mail stating "Your request was accepted," which means the Room was Booked

CASE B



You have permission to book the Room and the Room is not available.

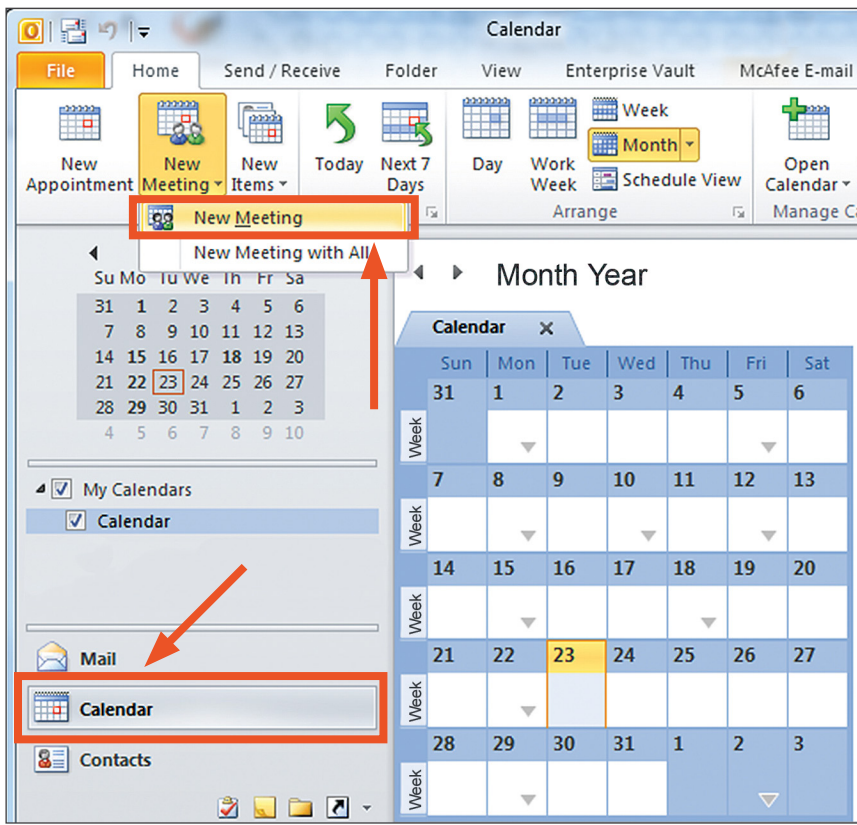
Employees will receive an email stating "Your Request was declined because there are conflicts."

CASE C

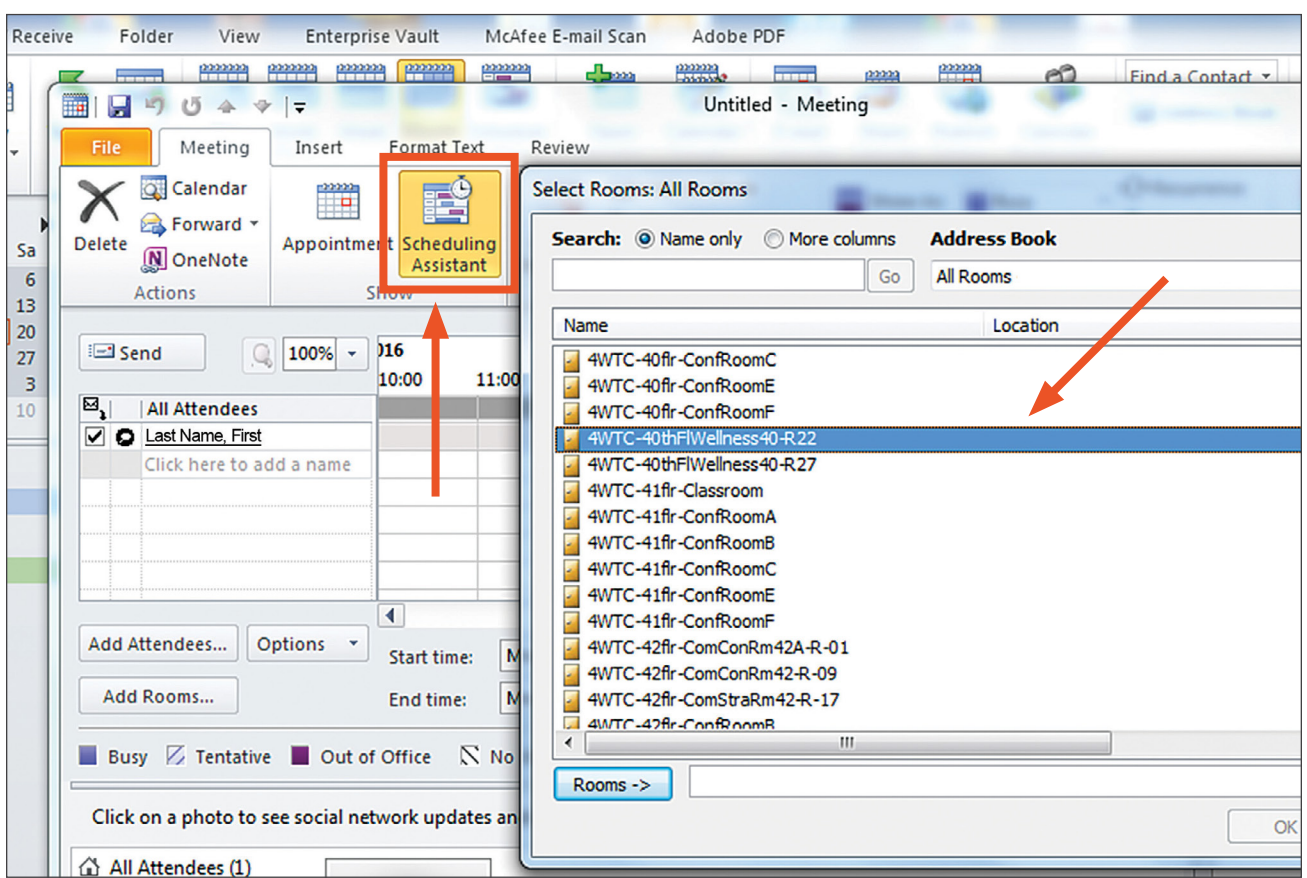


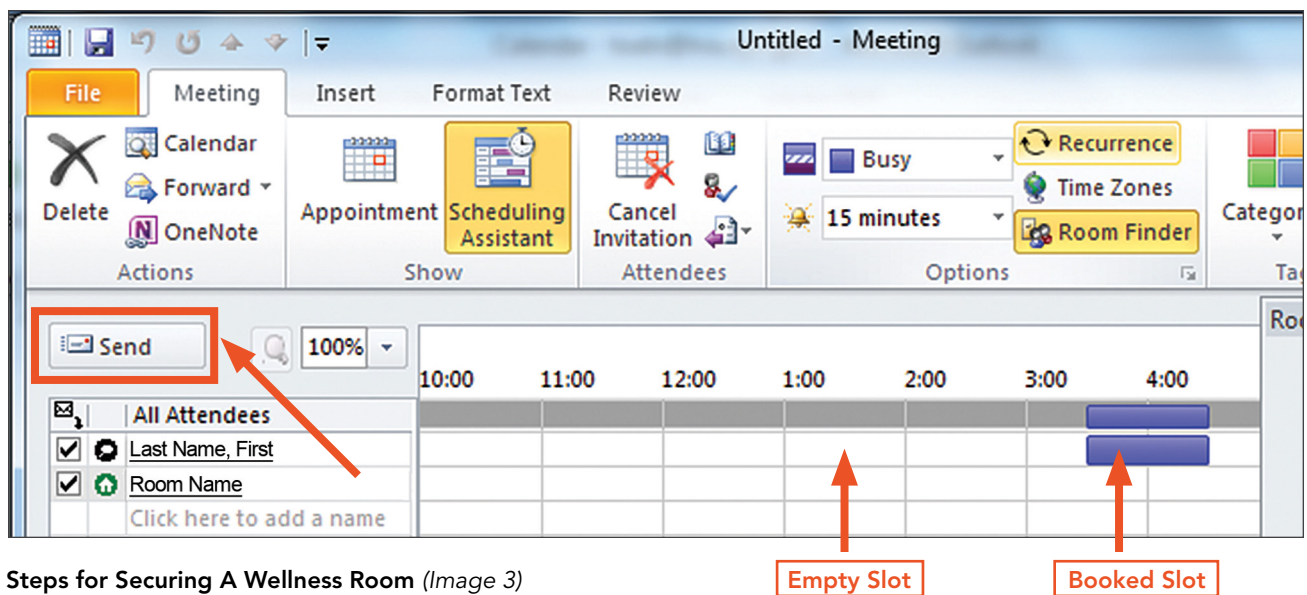
You do not have permission to Book the Room.

Employees will receive an e-mail stating "Your meeting Request was declined."



**Steps for Securing
A Wellness Room**
(From Top:
Image 1 & Image 2)





Steps for Securing A Wellness Room (Image 3)

THE FAMILY AND MEDICAL LEAVE ACT (FMLA)

FMLA requires HRA to provide up to 12 weeks of job-protected, unpaid leave to eligible employees for certain family and medical reasons. Employees are eligible if they have been employed with HRA for at least one year and have worked for at least 1,250 hours over the 12-month period immediately preceding the start of the leave. FMLA leave may be for intermittent (in separate blocks of time) or continuous periods. FMLA leave must be granted for any of the following qualifying events:

- ✓ The birth of a child and to care for the newborn child within one year of birth;
- ✓ Placement with the employee of a child for adoption or foster care and to care for the newly placed child within one year of placement;
- ✓ To care for the employee's spouse, child, or parent who has a serious health condition;
- ✓ A serious health condition that


makes the employee unable to perform the essential functions of his or her job;

- ✓ Any qualifying exigency arising out of the fact that the employee's spouse, son, daughter, or parent is a covered military member on "covered active duty;" or
- ✓ Twenty-six workweeks of leave during a single 12-month period to care for a covered service member with a serious injury or illness if the eligible employee is the service member's spouse, son, daughter, parent, or next of kin (military caregiver leave).

An employee is required to provide medical certification about the medically related qualifying event as well as other supporting documentation about other non-medically related qualifying events. At the employee's or employer's option, certain kinds of paid leave may be substituted for unpaid leave. Leave may be denied if certain notice and certification requirements are not met.

FMLA forms can be obtained through the Employee Online Requests

application. This application can be accessed through a link on the HRA homepage, under the "My Forms" tab. To access this application, staff members will simply click the Employee Online Requests application link and click on the employee related form entitled "Long Term Leave Request." The system will automatically recognize a staff member by the log-in ID he or she uses to access the HRA network; no separate log-in to this program will be required (except for OCSE employees, who will be prompted to enter their HRA network ID and password before they can access the system). Once a long-term leave request is submitted via the Employee Online Requests application, the staff member will automatically receive a system-generated email with further instructions and an attachment titled "Certification of Physician or Other Health Care Provider."


 **For more information, please e-mail the Office of Staff Resources Employee Relations and Services Unit at EmployeeRelations@hra.nyc.gov or fax the Unit at (917) 639-0337.**

N.Y.S. CIVIL SERVICE LAW SECTION 55-A PROGRAM

Section 55-a of the New York State Civil Service Law permits municipalities to employ persons, who have been certified as having a physical or mental disability, in civil service positions on a non-competitive basis. The City of New York implements this provision, which is administered by the New York City Department of Citywide Administrative Services (“DCAS”).

A qualified person with a disability who is appointed to the 55-a Program is not required to take a written or oral examination. Persons eligible under this program are not placed on a civil service list. Eligible persons will be evaluated on the basis of their qualifications and interviews. Eligibility for the 55-a Program is determined based on an official certification that an individual has a physical or mental disability and is qualified to perform the duties of the job. Applicants for employment within New York City agencies who wish to be certified for the 55-a program should apply directly to the job vacancy notice. Qualified persons must meet the skills, education and/or experience qualifications for the position. Further, they must meet other criteria relative to being certified as having a physical or mental disability and qualified to perform the duties of a position, with or without a reasonable accommodation.

Application for such consideration may be made through the RA/RC Human Resources Business Partners or the HRA 55-a Coordinator.

 **For more information, please contact the Office of Staff Resources Customer Care Solutions Desk at 212-331-4800. Questions may also be directed to OSRCustomerService@hra.nyc.gov.**




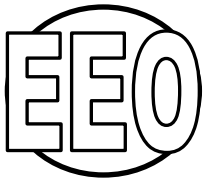
HRA CAREER COUNSELOR

The Career Counselor provides employees with information, advice and counseling on promotional opportunities, transfers, civil service examinations and career development at the agency and citywide.

These private/confidential counseling sessions enable employees to better understand their own motivations and career path and take proactive steps to improve the quality of their work life. HRA also facilitates the use of training to improve skills and access to career opportunities for all employees. In addition to extensive program specific training, which assists staff in being proficient in their current jobs, HRA

works with DCAS and other entities to provide training on topics as varied as computer skills to learning to work with challenging co-workers and clients. Additionally, the agency makes every effort to ensure that all employees have equal opportunities for acknowledgment, such as performance evaluations, employee incentives, and quality of work life and recognition programs as required by the City Charter Section 815(a).

 **For more information, please contact the Office of Staff Resources Customer Care Solutions Desk at 212-331-4800. Questions may also be directed to OSRCustomerService@hra.nyc.gov.**



*Human Resources Administration
Equal Employment Opportunity Office
150 Greenwich Street, 42nd Floor
New York, NY 10007
Telephone: (929) 221-5139
Fax: (212) 437-2162*

EEO COMPLAINT FORM¹

Please print the following information:

Name: _____ **EIN#:** _____

Civil Service Title: _____ **Office Title:** _____

Unit/Department: _____ **Supervisor's Name:** _____

Work Address: _____ **Work Telephone:** _____

What is the alleged basis of the EEO violation? (Check only those that apply)

- | | |
|--|---|
| <input type="checkbox"/> Age | <input type="checkbox"/> Religion |
| <input type="checkbox"/> Color | <input type="checkbox"/> Sexual Harassment |
| <input type="checkbox"/> Creed | <input type="checkbox"/> Sexual Orientation |
| <input type="checkbox"/> Disability | <input type="checkbox"/> Status as a Victim/Witness of Domestic Violence, Sexual Offenses, or Stalking |
| <input type="checkbox"/> Gender (Sex) | <input type="checkbox"/> Unemployment Status |
| <input type="checkbox"/> Gender Identity | <input type="checkbox"/> Credit History |
| <input type="checkbox"/> Marital Status | <input type="checkbox"/> Caregiver Status |
| <input type="checkbox"/> Military Status | <input type="checkbox"/> Retaliation (Filing EEO Compliant, Assisting EEO Investigation, Opposing discrimination or harassment, or requesting a reasonable accommodation) |
| <input type="checkbox"/> National Origin (Ancestry/Citizenship/Alienage) | <input type="checkbox"/> Other (Please specify below): _____ |
| <input type="checkbox"/> Partnership Status | |
| <input type="checkbox"/> Predisposing Genetic Characteristic | |
| <input type="checkbox"/> Prior Record of Arrest or Conviction | |
| <input type="checkbox"/> Race | |

What terms and conditions of your employment have been affected by the EEO violation?

- | | | | |
|------------------|--------------------------|------------------------|--------------------------|
| Recruitment | <input type="checkbox"/> | Performance Evaluation | <input type="checkbox"/> |
| Testing | <input type="checkbox"/> | Promotion | <input type="checkbox"/> |
| Hiring | <input type="checkbox"/> | Demotion | <input type="checkbox"/> |
| Work Assignments | <input type="checkbox"/> | Training Opportunities | <input type="checkbox"/> |
| Transfer | <input type="checkbox"/> | Discipline | <input type="checkbox"/> |
| Salary | <input type="checkbox"/> | Discharge | <input type="checkbox"/> |
| Benefits | <input type="checkbox"/> | Working Conditions | <input type="checkbox"/> |
| Leave | <input type="checkbox"/> | Other: _____ | <input type="checkbox"/> |

¹ All HRA staff, clients, job applicants, and employment and training program participants should use this form to file an EEO Complaint with HRA's EEO Office.

Who do you believe committed an EEO violation against you?

<u>Name</u>	<u>Job Title</u>	<u>Work Location</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

Did the alleged EEO violation occur within the past 12 months? Yes No

When did the alleged discrimination occur?

Date/Time: _____

Where did it happen?

Location: _____

Describe what you believe are the acts that have been committed against you that violated the EEO Policy.

Did you use more pages? Yes No
Were there witnesses to the alleged EEO violation? Yes No

If so, please provide the name, job title and work location of any witnesses to the alleged EEO violation.

<u>Name</u>	<u>Job Title</u>	<u>Work Location</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

Did you report this incident to anyone? Yes No
If so, please list the names, titles and work locations of each person.

<u>Name</u>	<u>Job Title</u>	<u>Work Location</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

Have you filed a complaint about the alleged EEO violation with any of the following external agencies? Yes No
If so, please state the date and number of the complaint.

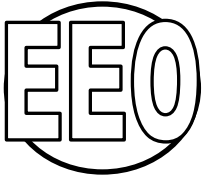
	Date filed	Case No.
<input type="checkbox"/> New York City Commission on Human Rights	_____	_____
<input type="checkbox"/> New York State Division of Human Rights	_____	_____
<input type="checkbox"/> United States Equal Employment Opportunity Commission	_____	_____
<input type="checkbox"/> United States Department of Labor	_____	_____
<input type="checkbox"/> New York City Department of Investigation	_____	_____

AFFIRMATION

I certify that I have read the above charge, that it is true to the best of my knowledge, information and belief and that I have read the attached notices concerning my rights to file a complaint with Federal, State and local civil rights enforcement agencies.

Signature

Date



*Human Resources Administration
Equal Employment Opportunity Office
150 Greenwich Street, 42nd Floor
New York, NY 10007
Telephone: (929) 221-5139
Fax: (212) 331-4332*

CONFIDENTIAL

PERSONAL

Complainant's Name: _____

Complainant's Work Address: _____

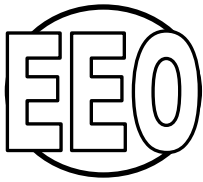
Complainant's Home Address: _____

Work Telephone #: _____

Home Telephone #: _____

What corrective action do you believe would address your complaint?

***Pending the investigation, please notify the EEO Office of any changes of address and telephone number(s).**



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Fax: (212) 437-2162

CONFIDENTIAL
EEO INCIDENT REPORT FORM¹
(To be completed by Supervisor or EEO Liaison)
Please print or type the following information:

Date: _____

Supervisor/Liaison Name: _____ **EIN#:** _____

Title: _____ **Unit/Department:** _____

Work Address: _____ **Work Telephone:** _____

Complainant(s) Name: _____ **EIN:** _____

Title: _____ **Unit/Department:** _____

Work Address: _____ **Work Telephone:** _____

Respondent(s) Name: _____ **EIN:** _____

Title: _____ **Unit/Department:** _____

Work Address: _____ **Work Telephone:** _____

Date of Complaint Filed: _____ **Date of Incident:** _____

What is the alleged basis of the EEO violation? (Check only those categories that apply)

- | | |
|--|---|
| <input type="checkbox"/> Age | <input type="checkbox"/> Religion |
| <input type="checkbox"/> Color | <input type="checkbox"/> Sexual Harassment |
| <input type="checkbox"/> Creed | <input type="checkbox"/> Sexual Orientation |
| <input type="checkbox"/> Disability | <input type="checkbox"/> Status as a Victim/Witness of Domestic Violence, Sexual Offenses, or Stalking |
| <input type="checkbox"/> Gender (Sex, Sexual Harassment) | <input type="checkbox"/> Unemployment Status |
| <input type="checkbox"/> Gender Identity | <input type="checkbox"/> Credit History |
| <input type="checkbox"/> Marital Status | <input type="checkbox"/> Caregiver Status |
| <input type="checkbox"/> Military Status | <input type="checkbox"/> Retaliation (Filing EEO Compliant, Assisting EEO Investigation, Opposing discrimination or harassment, or requesting reasonable accommodation) |
| <input type="checkbox"/> National Origin (Ancestry/Citizenship/Alienage) | <input type="checkbox"/> Other (Please specify below): |
| <input type="checkbox"/> Partnership Status | _____ |
| <input type="checkbox"/> Predisposing Genetic Characteristic | |
| <input type="checkbox"/> Prior Record of Arrest or Conviction | |
| <input type="checkbox"/> Race | |

¹ HRA's EEO Policy covers all HRA staff, clients, job applicants, and employment and training program participants.

What terms and conditions of employment have been affected by the EEO violation?

Recruitment	<input type="checkbox"/>	Performance Evaluation	<input type="checkbox"/>
Testing	<input type="checkbox"/>	Promotion	<input type="checkbox"/>
Hiring	<input type="checkbox"/>	Demotion	<input type="checkbox"/>
Work Assignments	<input type="checkbox"/>	Training Opportunities	<input type="checkbox"/>
Transfer	<input type="checkbox"/>	Discipline	<input type="checkbox"/>
Salary	<input type="checkbox"/>	Discharge	<input type="checkbox"/>
Benefits	<input type="checkbox"/>	Working Conditions	<input type="checkbox"/>
Leave	<input type="checkbox"/>	Other: _____	<input type="checkbox"/>

Did the alleged EEO violation occur within the past 12 months? Yes No

Please provide a brief description of the incident.

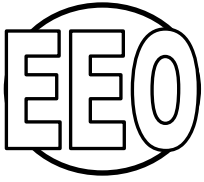
Please describe what action, if any, was taken.

AFFIRMATION

I certify that I have read the above charge and that it is true to the best of my knowledge, information and belief.

Signature

Date



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Fax: (212) 437-2162*

REQUEST FOR MEDIATION

I, _____, respectfully request that the Human Resources Administration’s (“HRA”) Equal Employment Opportunity (“EEO”) Officer or designee attempt to mediate my complaint in accordance with the HRA EEO Complaint Procedures and the guidelines implementing those procedures.

(Print Title and Name)

SIGNATURE OF COMPLAINANT OR AUTHORIZED REPRESENTATIVE

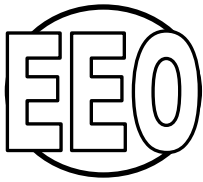
DATE

I, _____, agree to mediate the complaint filed against me.

(Print Title and Name)

SIGNATURE OF COMPLAINANT OR AUTHORIZED REPRESENTATIVE

DATE



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WITHDRAWAL FORM

I, _____, hereby request that the EEO Complaint filed on
(Print Title and Name)
_____, under Case No. _____, against _____
(Print Title and Name)

be withdrawn. I understand that the EEO Office may continue to have an obligation to address workplace civil rights issues, to the extent that I have raised them, in accordance with Federal, State, and local EEO laws, the City of New York's Discrimination Complaint Procedures, and the Human Resources Administration's EEO Policy.

NAME OF COMPLAINANT OR AUTHORIZED REPRESENTATIVE

SIGNATURE OF COMPLAINANT OR AUTHORIZED REPRESENTATIVE

DATE

ADDENDUM 5

Reasonable Accommodation Supplemental Questionnaire

SUPPLEMENTAL QUESTIONNAIRE

When visiting your health care provider to request a medical statement for your Reasonable Accommodation request, please make sure that they respond to the following questions in the statement. This will ensure that, should your request be granted, you will receive an accommodation that best suits your needs.

Please note that the responses to these questions must be included in the official statement from your doctor on their office's official letterhead.

Steven Banks
Commissioner

Stephanie Grant
Assistant Deputy Commissioner
EEO Officer

150 Greenwich Street
New York, NY 10007

929 221 5139

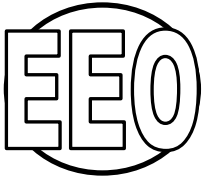
If the information below is not included in your medical statement at the same time as your initial request, there may be a delay in the process due to the lack of this vital information, or you may not receive the equipment or modification that best suits your condition.

Should you have any further questions regarding this matter, please feel free to contact the EEO Office at (929) 221-5139.

Your health care provider must include detailed answers to the following questions below in their medical statement supporting your request for a Reasonable Accommodation:

- **What is the nature of this individual's condition?**
- **What limitations does this individual have due to their condition, i.e. – what is the employee able to do/unable to do?**
- **What type of modification and/or equipment is necessary to accommodate the individual's condition?**
- **How will these changes help the employee perform the essential functions of their position?**
- **What is the expected duration of the individual's condition?**

Reasonable Accommodation Determination Appeal



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New York, NY 10007
Telephone: (929) 221-5139
Fax: (212) 437-2162*

REASONABLE ACCOMMODATION DETERMINATION APPEAL

Human Resources Administration employees/applicants who wish to appeal the determination of their request for a reasonable accommodation should complete this form. **ALL APPEALS MUST BE RECEIVED BY THE COMMISSIONER WITHIN TWENTY (20) DAYS OF THE DATE OF NOTIFICATION OF THE INITIAL DETERMINATION. PLEASE SUBMIT A COPY OF YOUR APPEAL TO THE EEO OFFICE.**

INSTRUCTIONS: Please complete Section I of this form and forward it in an envelope marked “Confidential” to the Commissioner’s Office, 150 Greenwich Street, 42nd Floor, New York, NY 10007. Please submit a copy of your appeal the Equal Employment Opportunity (“EEO”) Office, 150 Greenwich Street, 42nd Floor, New York, NY 10007.

SECTION I – TO BE COMPLETED BY EMPLOYEE/APPLICANT

Name: _____ **EIN#:** _____

Civil Service Title: _____ **Office Title:** _____

Unit/Department: _____ **File Number:** _____

Type of Accommodation Requested: _____

Date of Reasonable Accommodation Determination: _____

Statement of Appeal (clearly state all grounds for appeal; attach additional sheets as necessary):

CONTINUED ON NEXT PAGE

SECTION I – TO BE COMPLETED BY EMPLOYEE/APPLICANT (CONTINUED)

I am attaching the following additional documentation (do not resubmit any documentation):

I affirm that I have reviewed this reasonable accommodation determination appeal and that it is true to the best of my knowledge, information and belief.

Signature of Employee/Applicant

Date

SECTION II – FOR AGENCY USE

Date Appeal Received: _____

Date of Acknowledgement: _____

Disposition of Appeal: _____

Date of Notification of Disposition: _____

MEMORANDUM

TO: HRA Managers and Supervisors
FROM: Stephanie Grant
Assistant Deputy Commissioner/EEO
RE: **Mandated Supervisory Discussions**
DATE: May 11, 2016

In compliance with City, State and Federal regulations, HRA managers and supervisors are required to have staff conversations around Equal Employment Opportunity (“EEO”) twice each year. Managers and supervisors are required to report any behaviors that they observe, learn about or suspect may be a violation of the EEO policy to the EEO Office. They must also emphasize their commitment to the Agency’s EEO policies and affirm the right of each employee to file a discrimination complaint with the EEO Office. Please note, this is a discussion, it is not training. These meetings must be documented. Please also inform your staff that attendance during these meetings/discussions does not exempt them from their responsibilities to attend the mandated EEO training provided by the EEO Office.

Managers and supervisors should refer to [Executive Order E-728](#) to review information that should be covered in these discussions.

For this purpose, these discussions must be recorded and the link is [accessible on the intranet](#); Information for OCSE managers and supervisors is available by accessing http://osrapps.hra.nycnet/EEO_Discussion_Survey/UI/page/home.aspx. In most cases, upon entering the tracking system, a supervisor will be presented with a list of their employees. If a manager or supervisor is unable to access this link or if the information listed under your chain of command is incorrect, please click the Email EEO link and forward your question to EEOSupDiscuss@hra.nyc.gov. You will receive a response to your inquiry. Please remember that a supervisor must certify that a discussion has taken place by entering a checkmark next to the staff member’s names who were present during the meeting.

HRA’s EEO Office will send reminders to managers/supervisors who have not had the discussions with their staff. These lists will be forwarded to their RC Heads and HRBP’s for their follow-up.

Thank you for your cooperation.

Below are suggested talking points to facilitate this discussion with your staff. Please remember to track your conversations on the EEO Supervisory Discussions web application via the HRA intranet.

- HRA's EEO Office ensures that the Agency correctly practices the Citywide policies of fair and equal employment. HRA's EEO Policy covers all HRA staff, clients, job applicants, and employment and training program participants.
- Twice each year, I will remind you of your rights and responsibilities under the EEO policy, direct you where to file an EEO complaint and answer any questions you may have.
- The City of New York is an equal opportunity employer and prohibits discriminatory employment actions against and treatment of City employees and applicants for employment based on actual or perceived race, color, national origin, alienage or citizenship status, religion or creed, gender (including "gender identity" -- which refers to a person's actual or perceived sex, and includes self-image, appearance, behavior or expression, whether or not different from that traditionally associated with the legal sex assigned to the person at birth), disability, age (18 and over), military status, prior record of arrest or conviction, marital status, partnership status, genetic information or predisposing genetic characteristic, sexual orientation, or status as a victim of domestic violence, sexual offenses and stalking, credit history, unemployment status and discrimination based on caregiver status.
- The City's EEO Policy also prohibits any City employee from aiding, abetting, inciting, compelling or coercing any person present in a City facility, whether or not an employee of the City, from engaging in any conduct prohibited by this policy, including, but not limited to conduct that creates a hostile work environment based on any protected characteristic.
- It is also a violation of the EEO policy to retaliate against any individual who has filed an EEO complaint, assisted in an EEO investigation, opposed discrimination or discriminatory harassment or engaged in the reasonable accommodation process.
- Any employee that feels that he or she has been subjected to discrimination or harassment stemming from one of these protected categories is encouraged to speak with their supervisor or someone in the EEO Office.
- You may file a written or oral complaint, either anonymously or personally, to either your supervisor or directly to the EEO Office.

- As your supervisor or manager, I am required to report to the EEO Office any behaviors that I observe, learn about or suspect may be a violation of the EEO Policy.
- The EEO Office will review and investigate your complaint and, if an employee is deemed to have participated in discriminatory activity, will refer these matters to the appropriate divisions for review.
- All complaints, regardless of outcome, remain confidential, and you have the right to withdraw your complaint at any time.
- Please visit the HRA intranet for more information about the EEO Office, navigable from the “EEO” menu on the website’s top bar.

Any person who has a question related to the agency’s EEO Policy or would like to request a reasonable accommodation or file a complaint of employment discrimination, harassment, sexual harassment or retaliation may contact the HRA EEO Office at:

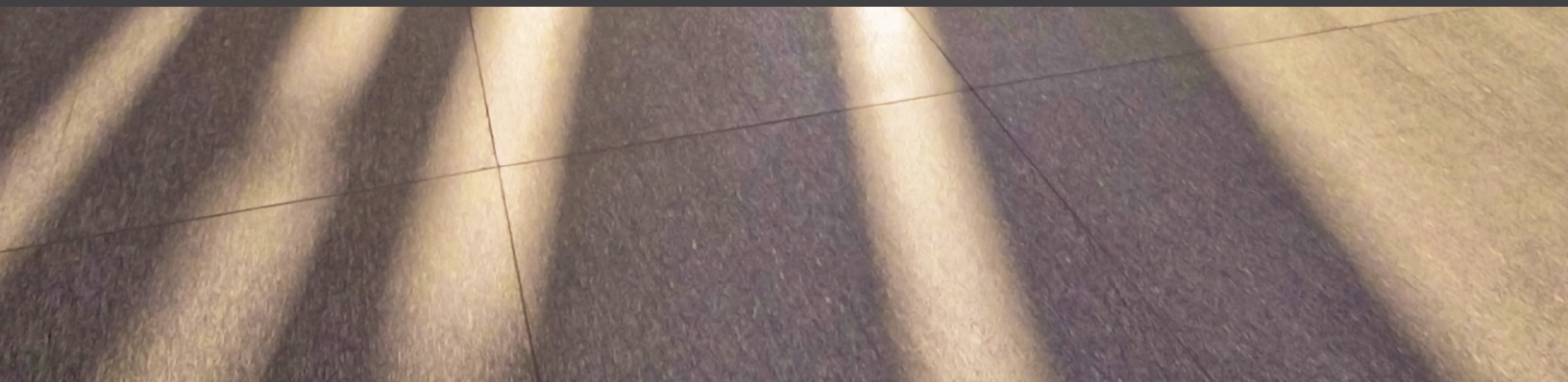
HRA Equal Employment Opportunity Office
150 Greenwich Street, 42nd Floor
New York, NY 10007
Telephone: (929) 221-5139
Fax: (212) 437-2162
TTY: (212) 331-5112



Equal Employment Opportunity Office
150 Greenwich Street, 42nd Floor
New York, NY 10007
Phone: (929) 221-5139
Fax: (212) 437-2162
Email: eeunit@hra.nyc.gov

Steven Banks
Commissioner

Stephanie Grant
Assistant Deputy Commissioner, EEO Officer



Appendix - 4

Department of Social Services (Human Resources Administration
Department of Homeless Services)
HRA Equal Employment Opportunity Policy
May 11, 2016

Informational No. 06-15
May 11, 2016

THE CITY OF NEW YORK
HUMAN RESOURCES ADMINISTRATION

THE HRA EQUAL EMPLOYMENT OPPORTUNITY POLICY

TO: Distribution I - VI

FROM: Stephanie Grant
Assistant Deputy Commissioner/EEO Officer

I. INTRODUCTION

The Human Resources Administration (HRA) is an Equal Employment Opportunity employer committed to ensuring fair employment practices and compliance with Federal, State, and local laws prohibiting employment discrimination and harassment. HRA's EEO Policy covers all HRA staff, clients, job applicants, and employment and training program participants. As a result, employment decisions at HRA shall be made on the basis of merit, fitness and equality of opportunity and without unlawful discrimination on the basis of:

- AGE
- CAREGIVER STATUS
- COLOR
- CONSUMER CREDIT HISTORY
- CREED
- DISABILITY
- GENDER (SEX)
- GENDER IDENTITY
- MARITAL STATUS
- NATIONAL ORIGIN (ANCESTRY/ALIENAGE, CITIZENSHIP/IMMIGRATION STATUS)
- MILITARY STATUS
- PARTNERSHIP STATUS
- PREDISPOSING GENETIC CHARACTERISTICS
- PRIOR RECORD OF ARREST/CONVICTION
- RACE
- RELIGION
- SEXUAL HARASSMENT
- SEXUAL ORIENTATION
- STATUS AS A VICTIM/WITNESS OF DOMESTIC VIOLENCE, SEX OFFENSES OR STALKING
- UNEMPLOYMENT STATUS

In addition to providing protection on the basis of the preceding categories, some Federal, State and local laws protect persons who are discriminated against and/or harassed because they are perceived to be in a protected class. Discrimination and/or harassment based on a person's actual or perceived protected status is also prohibited.

Anti-Discrimination protections apply to all of the terms and conditions of employment, including, but not limited to:

Recruitment	Salary and Benefits	Transfers
Testing	Performance Evaluations	Discipline
Hiring	Promotions	Discharge
Work Assignments	Training Opportunities	Working Conditions

For your information the EEO Policy and addendum may be downloaded at <http://www.nyc.gov/html/dcas/html/about/eeopol.shtml>. The EEO Policy handbook "About EEO: What You May Not Know" and the addendum may be downloaded at http://www.nyc.gov/html/dcas/html/about/eo_booklet.shtml.

HRA may be required to provide reasonable accommodations when requests are made in connection with disability, religion, victims/witnesses of domestic violence, sex offenses or stalking and/or pregnancy, childbirth or related medical conditions.

All employees are directed to comply with both the letter and the spirit of the law. Where unlawful discrimination or harassment is suspected, employees are encouraged to use the EEO Complaint and Investigation Procedure. Any person found to be engaging in unlawful discriminatory conduct or harassment will be subject to discipline which may include a reprimand, suspension, probation, demotion, transfer, termination and any other measures calculated to eliminate inappropriate behavior. In addition to implementing such disciplinary action, the HRA EEO Officer shall take such steps as may be necessary to address the impact that any unlawful discrimination or harassment has had on the complainant. The EEO Officer has the authority to recommend to the HRA Administrator/Commissioner that disciplinary action be taken against any employee who has violated the EEO Policy.

All personnel should work to maintain an atmosphere of appreciation of the diversity reflected in our staff and to promote understanding among our co-workers. Managers and supervisors are directed to make all employment decisions in accordance with this EEO Policy and to ensure compliance with the policy in their areas of responsibility.

Any person who wants to file an EEO complaint should immediately contact the EEO Office at:

HRA Equal Employment Opportunity Office
150 Greenwich Street, 42nd Floor
New York, NY 10007
Tel.: (929) 221-5139
Fax: (212) 437-2162

All complaints will be handled in confidence

Anti-Retaliation Policy

It is unlawful and a violation of this policy to retaliate against or harass any person for filing an EEO complaint, cooperating in an EEO investigation, opposing discrimination or harassment or engaging in other protected activity, such as requesting a reasonable accommodation. The Agency will not tolerate such retaliation. Any person who believes that she/he is being retaliated against is urged to file a complaint of retaliation with the EEO Office. Any employee who engages in such retaliation or harassment may be subject to discipline, which may include reprimand, suspension, probation, demotion, transfer, fine or termination.

Appendix - 5

Department of Social Services (Human Resources Administration
Department of Homeless Services)

Revision of the EEO Complaint and Investigation Procedures

May 11, 2016

Procedure No. 15-11
May 11, 2016

THE CITY OF NEW YORK
HUMAN RESOURCES ADMINISTRATION

REVISION OF THE EEO COMPLAINT AND INVESTIGATION PROCEDURES

TO: Distribution I - VI

FROM: Stephanie Grant
Assistant Deputy Commissioner/EEO Officer

I. INTRODUCTION

The purpose of this procedure is to provide clear information regarding the filing and processing of complaints of alleged employment discrimination, harassment, including sexual harassment and retaliation, in accordance with the NYC Department of Citywide Administrative Services, Division of Citywide Equal Employment Opportunity (EEO) guidelines. The Human Resources Administration (HRA) is committed to handling all complaints promptly and fairly. HRA staff, clients, job applicants, and employment and training program participants are urged to follow this procedure immediately whenever they have a complaint or are aware of a problem with the agency possibly involving employment discrimination, harassment, including sexual harassment or retaliation. The effective use of this procedure should result in timely and equitable resolution of the complaint and prevent any discriminatory practice from harming other staff members, clients, job applicants and/or employment and training program participants. Those accused of violating the EEO Policy will have a right to respond in writing to the allegations.

II. WHEN TO FILE A COMPLAINT

You should consult with the EEO Office if you believe that you are or have been discriminated against and/or harassed by a manager, supervisor, another employee or an independent contractor of the City of New York on the basis of actual or perceived:

- Age
- Color
- Creed
- Disability
- Gender (Sex, Sexual Harassment)
- Gender Identity
- Marital Status
- Military Status
- National Origin (Includes Ancestry
Citizenship/Alienage Status)
- Partnership Status
- Predisposing Genetic Characteristic
- Prior Record of Arrest or Conviction
- Race
- Religion
- Sexual Orientation
- Status as a Victim or Witness of Domestic Violence,
Sexual Offenses or Stalking
- Unemployment Status
- Consumer Credit History
- Caregiver Status

In addition to providing protection on the basis of the preceding categories, some federal, state and local laws protect persons who are discriminated against and/or harassed because they are perceived to be in a protected class. Discrimination and/or harassment based on a person's actual or perceived protected status is also prohibited.

Anti-Discrimination protections apply to all of the terms and conditions of employment, including, but not limited to:

Recruitment	Salary and Benefits	Transfers
Testing	Performance Evaluations	Discipline
Hiring	Promotions	Discharge
Work Assignments	Training Opportunities	Working Conditions

You should consult with the EEO Office if you believe that a manager, supervisor, another employee or an independent contractor of the City of New York has sexually harassed you. Federal, State, and local laws and HRA's EEO Policy prohibit the following types of discriminatory practices:

- 1) discriminatory treatment of employees in hiring, assignments, working conditions, salary and benefits, evaluations, promotions, training, transfers, discipline, termination and any other terms or conditions of employment;
- 2) policies that have a disproportionate impact on a group protected by the law, unless they are justified by business necessity;
- 3) failure to make a reasonable accommodation for an employee with a disability (a violation of the Americans with Disabilities Act (ADA)), or an employee's religious observance, or status as a victim of domestic violence, sex offenses or stalking; and
- 4) discriminatory harassment, intimidation, ridicule or insults.

For your information the EEO Policy and addendum may be downloaded at <http://www.nyc.gov/html/dcas/html/about/eeopol.shtml>. The EEO Policy handbook "About EEO: What You May Not Know" and the addendum may be downloaded at http://www.nyc.gov/html/dcas/html/about/eo_booklet.shtml.

The EEO Office will assist you in determining whether the issue you have raised is appropriate for resolution through the EEO complaint process. HRA staff, clients and job applicants will not be retaliated against or harassed for filing an EEO complaint, cooperating in an EEO investigation, opposing discrimination or harassment or engaging in other protected activity, such as requesting a reasonable accommodation. Additional details are provided in the subsection of the procedure entitled "Retaliation".

III. WHERE TO SEEK ASSISTANCE OR FILE AN INTERNAL COMPLAINT

Any person who has a question or wants to talk about a problem related to the agency's EEO Policy or to file a complaint of employment discrimination, harassment, sexual harassment or retaliation may contact the HRA EEO Office at:

HRA Equal Employment Opportunity Office
150 Greenwich Street, 42nd Floor
New York, NY 10007
(Telephone) (929) 221-5139
(Fax) (212) 437-2162
(TTY) (212) 331-5112

IV. HOW TO SEEK ASSISTANCE OR FILE AN INTERNAL COMPLAINT

HRA staff, clients, job applicants and employment and training program participants have a right to meet privately with the EEO Office during work hours; however, an employee should obtain approval before leaving his or her work assignment. An employee need not disclose to the supervisor the purpose for meeting with the EEO Office. Supervisors cannot deny a reasonable leave request to meet with the EEO Office during work hours. Managers and supervisors shall allow staff to meet with the EEO Office at the earliest practicable time consistent with the operational needs of their work locations.

Employees visiting the EEO Office to seek advice or file a complaint during their regularly scheduled work hours will not have the time charged against leave accruals. A memorandum authorizing excused time will be provided to verify the employee's visit to the EEO Office. In the event that an employee wishes to have his or her visit to the Office kept confidential, the employee will be responsible for complying with time and leave policy and no memorandum will be prepared.

Arrangements can be made with the EEO Office to schedule a meeting with an employee at a site other than the EEO Office, if necessary, in order to ensure confidentiality. At the employee's request, arrangements may also be made to hold the meeting before or after work hours or during the employee's lunch period.

Staff, clients, job applicants and employment and training program participants may bring a representative of their choice to meetings with the EEO Office provided advance notice is given.

If necessary, the EEO Office will provide a sign language interpreter and other forms of effective communication for persons with disabilities to facilitate access to EEO services.

V. ANONYMOUS COMPLAINTS

Individuals who wish to discuss a potential EEO issue without revealing their identity may do so by telephoning or writing to the EEO Office. Where necessary, communication may also be made through TTY, relay service or other alternate means. In such cases, the EEO Office will provide counseling and take such follow-up action as may be appropriate and possible, given the restraints of anonymity. Anonymous complainants should be aware that it might be necessary for the EEO Office to investigate the alleged discriminatory behavior and to take or recommend action to remedy unlawful behavior on behalf of the Agency and the City, even if the anonymous complainant wishes to withdraw his/her complaint.

VI. CONFIDENTIALITY

All EEO matters will be handled under the supervision of HRA's EEO Office, in consultation with the HRA General Counsel's Office where appropriate. All complaints, investigations, requests for reasonable accommodations and records will be handled, to the extent possible, in a manner that will protect the private interests of those involved. EEO matters may be discussed with other persons who may have information about a complaint or who are necessary to implement reasonable accommodations for disability, religion, victims of domestic violence, sex offenses, or stalking and pregnancy, childbirth or a related medical condition. Therefore, it may be necessary to disclose information to persons with a legitimate need to know about the matter.

VII. SERVICES AVAILABLE FROM THE EEO OFFICE

The EEO Office will interview the person seeking assistance to determine whether the person should receive assistance in the form of counseling; whether the person wants to request mediation; whether the person wishes to file a complaint of discrimination which will be investigated internally or to file a formal complaint with an external EEO enforcement Agency. The EEO Office is also responsible for forwarding requests for sign language interpreters and other alternate forms of effective communication for persons with disabilities to facilitate access to EEO services.

A. Counseling

The EEO Office will discuss with the person seeking assistance various options for handling the matter. These options may include further actions the employee could take on his or her own behalf, referrals to other offices and/or agencies, which may be of assistance or other informal assistance from the EEO Office.

B. Mediation

Mediation is a voluntary, informal and confidential process that provides an opportunity for everyone involved in a complaint to come to a mutual agreement about how the complaint should be resolved. It is an alternative that may quickly resolve complaints without a full investigation.

Requests for mediation should be made to the EEO Office. Mediation may be requested by any party involved and may be declined by any party. The EEO Officer will determine whether the complaint is appropriate for mediation and forward to the Office of Conflict Resolution.

VIII. INVESTIGATION OF COMPLAINTS

A person may file a written complaint of discrimination with the Agency's EEO Office at any time within one year of the date that the events, which are the subject of the complaint, occurred. Requests for reasonable accommodation are not subject to any time limitations. A copy of the Complaint of Discrimination Form (W-766M) and/or the Reasonable Accommodation Request Form (W-766C) may be obtained on the HRA Intranet.

The EEO Officer may also determine that another form of communication, such as an electronic mail, telephone call or a letter, should be handled as a complaint. In such event, or when a person who has a disability which precludes his/her completion of the Complaint of Discrimination Form seeks to file a complaint, the EEO Officer shall complete the form on his/her behalf.

The EEO Officer shall also complete a Complaint of Discrimination Form when s/he initiates an investigation on his or her own initiative. The EEO Officer or a person acting under the direction of the EEO Officer will conduct the investigation. In appropriate cases the investigation will be conducted in conjunction with the Agency's Disciplinary Officer, General Counsel's Office and/or Inspector General.

Any person who is interviewed in the course of an investigation shall have the right to be accompanied by a representative of his or her choice. A person who has been named as the respondent in the complaint of discrimination shall be notified of the nature of the complaint and shall have the opportunity to respond in writing.

The EEO Office will make a confidential written report of the investigation to the Commissioner or designee. If the EEO Officer concludes on the basis of the investigation that a violation of the Agency's EEO Policy has occurred, s/he shall recommend appropriate corrective action. The Commissioner or designee will review the EEO Office's report and take any corrective action that s/he deems appropriate. The EEO Office will advise all parties in writing of the outcome of the complaint.

IX. DISCIPLINE AND OTHER CORRECTIVE ACTION

The Commissioner or designee will review the EEO reports and take any corrective action that s/he deems appropriate. Corrective action may include disciplinary measures such as formal reprimand, suspension, probation, transfer, demotion, fine or termination. Disciplinary measures shall be taken in accordance with any applicable provisions of law, rules and regulations, and collective bargaining agreements. Corrective action may also include measures necessary to address the impact that any conduct in violation of the law or City/Agency policy has had on the complainant.

X. RETALIATION

It is unlawful and a violation of this policy to retaliate against or harass any person for filing an EEO complaint, cooperating in an EEO investigation, opposing discrimination or harassment or engaging in other protected activity, such as requesting a reasonable accommodation. The Agency will not tolerate such retaliation. Any person who believes that she/he is being retaliated against is urged to file a complaint of retaliation with the EEO Office. Any employee who engages in such retaliation or harassment may be subject to discipline, which may include reprimand, suspension, probation, demotion, transfer, fine or termination.

XI. WITHDRAWING COMPLAINTS

The person who filed the complaint may withdraw a complaint of employment discrimination, harassment, sexual harassment or retaliation at any time. In some instances, the agency EEO Officer will find it appropriate to end the investigation when the complaint is withdrawn. However, prior to making the determination to end the investigation, the EEO Officer must determine whether the agency should take corrective action to prevent or eliminate an illegal or inappropriate situation. If there is such evidence, the EEO Office will continue the investigation until it is prepared to recommend whether the agency should take corrective action. In either event, the EEO Office shall notify the parties in writing that the complainant has withdrawn the complaint. The EEO Office shall notify the parties whether the investigation has been terminated or is continuing.

XII. RA/RC RESPONSIBILITIES

A. RA/RC Cooperation and Assistance

Upon commencement of an investigation, the EEO Office will initiate a fact-finding process. RA/RC staff will cooperate with the EEO Office in this endeavor which may include, but will not be limited to, the review of pertinent official documents and files maintained at the work location or in the central office; discussions with supervisors, managers, co-workers, or other involved parties; and site visits with confidential interviews of selected representative staff at the complainant's job site. All supervisors and managers are expected to cooperate fully and assist the EEO Office with any EEO investigation undertaken.

B. RC Submission of Documents

When requested by the EEO Office or RC/EEO Network Liaison, whether verbally or in writing, files and documents (including written responses to inquiries relative to allegations) must be submitted within 72 hours. Original documents will be returned to the RC upon completion of the EEO Office's fact-finding investigation.

C. EEO Office's Recommendations

When the EEO Office recommends conferencing of an alleged discriminator/harasser, the RC administration will present the allegations, note the response to the allegations and reaffirm HRA's EEO Policy. The conference will be documented and a copy submitted to the EEO Office. If the EEO Office's fact-finding investigation determines a need for a plan of corrective action, the EEO Office will provide the RC with recommendations for such action. The EEO Office will follow-up to ensure the RC has taken appropriate measures to resolve the issue. Additionally, as warranted, disciplinary action may be taken in accordance with applicable provisions of law, rules and regulations or any relevant collective bargaining agreement.

XIII. OTHER PLACES WHERE A COMPLAINT MAY BE FILED

Any employee, client, job applicant and/or employment and training program participant who believes that s/he has experienced discrimination has a right to file a formal complaint with Federal, State or local agencies, some of which are listed below. A person does not give up this right when s/he files a complaint with HRA's EEO Office. The following Federal, State and local agencies enforce laws against discrimination:

NEW YORK CITY COMMISSION ON HUMAN RIGHTS
40 Rector Street
New York, NY 10006
Telephone: (212) 306-7450
www.nyc.gov/cchr

NEW YORK STATE DIVISION OF HUMAN RIGHTS
One Fordham Plaza, 4th Fl.
Bronx, NY 10458
Tel: (718) 741-8400
Or

55 Hanson Place, Rm. 1084
Brooklyn, NY 11217
Tel: (718) 722-2385
www.dhr.ny.gov

UNITED STATES EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
New York District Office
33 Whitehall Street, 5th Floor
New York, NY 10004
Telephone: (800) 669-4000 Fax: (212) 336-3790 TTY: (800) 669-6820
www.eeoc.gov

In addition to filing with the preceding agencies, a person with a complaint alleging discrimination based on disability may file with:

UNITED STATES DEPARTMENT OF JUSTICE
Civil Rights Division, Disability Rights Section
950 Pennsylvania Avenue, North West
Washington, DC 20530
Telephone: (800) 514-0301 TTY: (800) 514-0383
www.ada.gov

Please Note: There are statutory deadlines for filing complaints with each of these agencies. The deadline in some instances is as short as 180 days. Therefore, if you believe you have been discriminated against and wish to file a complaint with an external Agency, to preserve your rights, promptly contact the City Commission on Human Rights, the State Division of Human Rights, the EEOC, the Department of Justice or a private attorney for further guidance.

NOTE: FEDERAL LAW PROHIBITS RETALIATION AGAINST AN EMPLOYEE WHO, IN ASSERTING HIS OR HER CIVIL RIGHTS, FILES A CHARGE OF EMPLOYMENT DISCRIMINATION OR SEXUAL HARASSMENT WITH ANY HUMAN RIGHTS AGENCY OR ASSISTS IN THE INVESTIGATION THEREOF.



**Department of
Social Services**

Human Resources
Administration

Department of
Homeless Services

W-2-570
11/17

**Office Of Audit &
Quality Assurance**

October 19, 2018

Steven Banks
Commissioner

Charise L. Terry, PHR
Executive Director of EEPC
253 Broadway, Suite 602
New York, NY 10007

Molly Murphy
DSS First Deputy
Commissioner

Saratu Ghartey
Chief Program
Accountability Officer

Maria Ciniglio
Deputy Commissioner

150 Greenwich Street
New York, NY 10007

929 221 7126

**Re: Corrective Action Plan on the Audit
Report on Evaluation and Monitoring
of DSS' (Human Resources
Administration & Department of Homeless
Services) Sexual Harassment Prevention
and Response Practices January 1, 2016 –
December 31, 2017**

Dear Ms. Terry:

Thank you for sharing with us the Preliminary report for Audit: Review, Evaluation and Monitoring of the Department of Social Services' Human Resources Administration and Department of Homeless Services Sexual Harassment Prevention and Response Practices dated October 5, 2018. We have reviewed the referenced report, and our responses are enclosed.

Attached please find our agency response in the form of a corrective action plan which identifies the actions that we have already taken or will take in the future to address any issues. We remain committed to ensuring agency compliance with all applicable EEO sexual harassment prevention and response practices.

We are confident that our response demonstrates our commitment to improve our operations. Should you have any questions, please contact Sonia Lamrhari, Director - DSS Bureau of Audit Coordination at 929-221-5724.

Sincerely,

Maria Ciniglio



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

Charise L. Terry, PHR
Executive Director

Judith Garcia Quiñonez, Esq.
Executive Agency Counsel

Jennifer Shaw, Esq.
Executive Agency Counsel/
Director of Compliance

253 Broadway
Suite 602
New York, NY 10007

212. 615. 8939 tel.
212. 676.2724 fax

BY MAIL AND EMAIL

October 30, 2018

Steven Banks
Commissioner
Department of Social Services
150 Greenwich Street
New York, NY 10007

RE: Audit Resolution #2018AP/225-069-071-(2018): Final Determination Pursuant to the Review, Evaluation and Monitoring of the Department of Social Services' (Human Resources Administration and Department of Homeless Services) Sexual Harassment Prevention and Response Practices from January 1, 2016 to December 31, 2017.

Dear Commissioner Banks:

On behalf of the members of the Equal Employment Practices Commission (EEPC), thank you for your Deputy Commissioner's October 19, 2018 response to our October 5, 2018 Preliminary Determination and for the cooperation extended to our staff during the course of this audit. Consistent with the powers and duties of agency heads, set forth in New York City Charter, the EEPC requires your signed response to this Final Determination.

The Department of Social Services falls within this Commission's purview under Chapter 36, Section 831.a of the New York City Charter (Charter), which delineates city agency as any "city, county, borough or other office, administration, board, department, division, commission, bureau, corporation, authority, or other agency of government where the majority of the board members of such agency are appointed by the mayor or serve by virtue of being city officers or the expenses of which are paid in whole or in part from the city treasury..."

Section 815 of the Charter, which sets forth the duties of all heads of city agencies, mandates in Subdivision h, that "[t]he head of each city agency shall ensure that such agency does not discriminate against employees or applicants for employment as prohibited by federal, state and local law." To this end, Charter Section 815.a(19) specifies that "heads of city agencies shall have the following



**Equal Employment
Practices Commission**

powers and duties... to establish measures and programs to ensure a fair and effective affirmative employment plan to provide equal employment opportunity for minority group members and women... and, in accordance with the uniform procedures and standards established... for this purpose, to adopt and implement an annual plan... [c]opies of such plans shall be filed with the... equal employment practices commission."

As indicated in our Preliminary Determination, the EEPC has adopted uniform standards¹ to assess agencies' employment practices and programs for compliance with federal, state and local laws, regulations, policies and procedures designed to increase equality of opportunity for municipal government employees and job applicants. The attached Determination contains the EEPC's findings and required corrective actions pertaining to the referenced review, evaluation and monitoring of your agency's employment practices and procedures.

Chapter 36, Section 832.c of the New York City Charter requires that: 1) the EEPC assign a compliance-monitoring period of up to six (6) months to monitor your agency's efforts to eliminate remaining required corrective actions; and 2) the agency provide a written response within 30 days from the date of this letter indicating corrective action taken.

The assigned compliance-monitoring period is: NOVEMBER 2018 TO APRIL 2019. Implementing all the corrective actions prior to the conclusion of the six months is highly encouraged and will serve to shorten the compliance-monitoring period.

If corrective actions remain: Your agency's response should indicate what steps your agency has taken, or will take, to implement the corrective actions during the designated period. Documentation that supports the implementation of each corrective action shall be uploaded to TeamCentral, the EEPC's Automated Compliance-Monitoring System. Your agency will be monitored monthly until all corrective actions have been implemented. Instruction on how to access and navigate TeamCentral is attached. Upon your agency's completion of the final corrective action, the EEPC requires that your agency upload a final memorandum signed by the agency head that informs employees of the changes implemented pursuant to our audit and re-emphasizes commitment to the EEO program. Upon receipt of the final memorandum, the EEPC will issue a *Determination of Compliance*.

If no corrective actions remain: Your agency is exempt from the aforementioned monitoring period. However, the EEPC requires a final memorandum signed by the agency head that informs employees of the changes implemented pursuant to our audit and re-emphasizes commitment to the EEO program. This will be considered your agency's final action. Upon receipt of the memo, a *Determination of Compliance* will be issued.

If there are further questions regarding this Final Determination or the compliance-monitoring process, please have the Principal EEO Professional contact Jennifer Shaw, Esq., Executive Agency Counsel/Director of Compliance at jshaw@eepc.nyc.gov or 212-615-8942.

¹ Founded upon and consistent with federal, state and local laws, regulations, procedures and policies including, but not limited to, the Citywide Equal Employment Opportunity Policy - Standards and Procedures to be Utilized by City Agencies; New York City Human Rights Law (NYC Administrative Code, §§8-107.1(a) and 8-107.13(d)); New York State Civil Service Law §55-a and the equal employment opportunity requirements of the New York City Charter.



Thank you and your staff for your continued cooperation.

Sincerely,


Charise L. Terry, PHR
Executive Director

C: Stephanie Grant, Principal EEO Professional, Department of Social Services
Athina McBean, DHS Executive Director/EEO Officer, Department of Social Services

Enclosed: TeamCentral Agency Manual

FINAL DETERMINATION

Agency response indicating corrective action taken with documentation is due within 30 days.

The Equal Employment Practices Commission's findings and required corrective actions are based on the audit methodology, which includes collection and analysis of the documents, records and data the agency provided in response to the *EEPC* document and information request; the *EEPC Preliminary Interview Questionnaires (PIQ)* for EEO professionals and others involved in EEO program administration; and, if applicable, the *EEPC Employee Survey*; the *EEPC Supervisor/Manager Survey*; the agency's *Annual EEO Plans* and *Quarterly EEO Reports*; and workforce data from the *Citywide Equal Employment Database System*. Additional research and follow-up discussions or interviews were conducted as appropriate.

After reviewing the agency's optional response² (if applicable) to the EEPC's preliminary Determination, our Final Determination is as follows:

Agree

Regarding your responses to the following EEPC required corrective actions, we *Agree* based on documentation that is attached to your response.

Corrective Action #9 Submit to the EEPC an Annual Plan of measures and programs to provide equal employment opportunity, and quarterly reports on efforts to implement the Plan within 30 days following each quarter. Include a breakout of sexual harassment complaint activity in each quarterly report.

Agency Response: "[...] DSS EEO agrees that we did not include a breakout of complaint activity in each quarterly report. Going forward, the agency will provide this breakout of complaint activity which includes sexual harassment complaints." (Agency Response pgs. 5 & 6)

EEPC Response: The EEPC accepts the agency's response and documentation provided to confirm that corrective action **#9** has been implemented. The agency submitted quarterly complaint summary reports, which included a breakout of sexual harassment complaint activity, for all eight quarters of the audit period. In addition, the agency provided quarterly complaint summary reports, with a breakout of complaint activity, for the period of January 1, 2018 to September 30, 2018. The EEPC also recognizes the agency's commitment to provide the EEPC with a breakout of EEO complaint activity with its future submissions of quarterly reports.

Monitoring Required

The agency's implementation of the following required corrective actions will be monitored during the assigned compliance monitoring period.

Corrective Action #1 Establish and implement a training plan for new and existing employees to ensure that all individuals who work within the agency, including managers and supervisors,

² Excerpts are italicized.

receive training on the prevention of sexual harassment as well as discrimination complaint and investigation procedures.

Agency Response: “DSS agrees with this recommendation. DSS will extend the New Hire Orientation to include the 1 ½ - 2 hour EEO Mandated training, which includes information regarding sexual harassment. DSS will request that DCAS’ Office of Citywide Equity and Inclusion provide DSS with access to their EEO Computer Based training so that our existing staff will be allowed to take the mandated EEO training online.” (Agency Response pg. 1)

EEPC Response: The EEPC recognizes the agency’s efforts to implement corrective action #1. To demonstrate compliance, please provide the agency’s training plan and documentation that demonstrates that the agency’s new and existing employees received training on the prevention of sexual harassment as well as discrimination complaint and investigation procedures.

Corrective Action #2 Serve the respondent with a notice of the complaint that includes the respondent’s right to respond to the allegations and right to be accompanied by a representative of his/her choice. Maintain in the complaint file documentation regarding the service of notice on the respondent.

Agency Response: “DSS agrees with this recommendation. DSS’ policy and practice is to provide notice of the complaint to the respondent. However, there were three case files that did not contain the notice of the complaint to the respondent. DSS will ensure that the complaint files include these notices going forward.” “The EEO Office will prepare a checklist for each case file to ensure that they will contain a notice of the complaint to the respondent.” (Agency Response pg. 1)

EEPC Response: The EEPC recognizes the agency’s efforts to implement corrective action #2. To demonstrate compliance, please provide the aforementioned agency checklist, documentation that the respondent is served with a notice of the complaint that includes the respondent’s right to respond to the allegations and right to be accompanied by a representative of his/her choice, and documentation that the service of notice on the respondent is maintained in the complaint file.

Corrective Action #3 Issue a conclusive report within 90 days of the date the complaint was filed. Commence an investigation immediately if allegations raised sufficiently warrant an investigation.

Agency Response: “DSS agrees with this recommendation. The DSS EEO Office’s policy is to make every attempt to complete our investigations within 90-days of the date the complaint was filed. Based on the volume and the complexity of the complaints received, it has not always been possible to complete our investigations with (sic) 90-days, particularly following the integration of HRA and DHS.” “DSS/EEO is in the process of backfilling an EEO Counselor position, which will improve workflow and shorten the length of time it takes to complete our investigations.” (Agency Response pg. 2)

EEPC Response: The EEPC recognizes the agency's efforts to implement corrective action #3. To demonstrate compliance, please provide documentation that the agency has hired an EEO Counselor, and documentation demonstrating that investigations are commenced immediately if allegations raised sufficiently warrant an investigation and that a conclusive report is issued within 90 days of the date the complaint is filed.

Corrective Action #4 In rare circumstances where a complaint investigation cannot commence immediately, or where a conclusive report cannot be issued within 90 days, specify in the complaint file the reason for the delay and project a time frame for completion of the report. Notify the complainant and respondent of the delay.

Agency Response: "DSS agrees with this recommendation. [...] The DSS EEO Office will annotate in the complaint file the reason for any delay of the complaint investigation and notify the complainant and respondent of the delay. The EEO Office will prepare a checklist for each case file to ensure complainants and respondents are notified of investigation delays." (Agency Response pg. 2)

EEPC Response: The EEPC recognizes the agency's efforts to implement corrective action #4. To demonstrate compliance, please provide the aforementioned agency checklist, documentation to demonstrate that in rare circumstances where a complaint investigation cannot commence immediately, or where a conclusive report cannot be issued within 90 days, the reason for the delay and a projected time frame for completion of the report are specified in the complaint file, and documentation to demonstrate that the complainant and respondent were notified of the delay.

Corrective Action #5 Establish and implement a policy whereby the agency head (or an approved direct report other than the General Counsel) reviews the principal investigator's conclusive report; issues a written/electronic determination adopting, rejecting, or modifying the recommended action; and signs each determination, via writing or electronically, to indicate it has been reviewed and adopted.

Agency Response: "[...] DSS already has a DSS-HRA-DHS EEO Complaint & Investigations Procedures, which establishes that the EEO Office will make a confidential written report of the investigation to the DSS-HRA-DHS Commissioner or designee [and a]ll EEO investigative reports are reviewed and signed by the Commissioner. The reports are provided to the Commissioner in batches and not on a rolling basis. [...]DSS EEO Office will provide the General Counsel and the Commissioner with completed investigations on a rolling basis instead of batching them for periodic review." (Agency Response pg. 3)

EEPC Response: The EEPC recognizes the agency's efforts to implement corrective action #5. To demonstrate compliance, please provide documentation of a policy or protocol whereby conclusive reports for completed complaint investigations are provided to the agency head for review on a rolling basis, and the agency head issues a signed written/electronic determination adopting, rejecting, or modifying the recommended action.

Corrective Action #6 Inform each complainant and respondent of the conclusion and outcome of their complaint investigation in writing as part of the agency's complaint procedure.

Agency Response: “DSS agrees with this recommendation. The DSS EEO Office's policy and practice is to inform each complainant and respondent of the conclusion and outcome of their investigation in writing. [...] The EEO Office will prepare a checklist for each case file to ensure complainants and respondents are informed of the outcome of the complaint investigation in writing.” (Agency Response pg. 4)

EEPC Response: The EEPC recognizes the agency's efforts to implement corrective action #6. To demonstrate compliance, please provide the aforementioned agency checklist and documentation to demonstrate that each complainant and respondent is informed of the conclusion and outcome of their complaint investigation in writing.

Corrective Action #7 Maintain documentation regarding directives or decisions between the agency head (or a direct report other than the General Counsel) and the principal EEO Professional that impact the administration and operation of programs, policies or procedures concerning sexual harassment.

Agency Response: “[...] The EEO Officer maintains meeting agendas between her and the Commissioner and takes copious notes/minutes. At the conclusion of the meetings, the EEO Officer reviews the notes/minutes, takes appropriate action(s) and provides the Commissioner with updates regarding the measures taken on his directives and/or decisions that impact the administrations (sic) and operation of programs, policies and procedures concerning all EEO related matters including sexual harassment. [...] Going forward, the DSS EEO Office will create and maintain meeting minutes that will document directives, decisions and action items resulting from these meetings.” (Agency Response pg. 4)

EEPC Response: The EEPC recognizes the agency's efforts to implement corrective action #7. The agency will be monitored for demonstration that it is maintaining documentation of directives or decisions between the agency head (or a direct report other than the General Counsel) and the principal EEO Professional that impact the administration and operation of programs, policies, or procedures concerning sexual harassment.

Corrective Action #8 Ensure that managers and supervisors are held accountable for enforcing the agency's sexual harassment prevention policies and complaint procedures. Document this expectation and its implementation.

Agency Response: “DSS agrees with this recommendation. The EEO Office worked with our ITS (Information Technology Services) Department to create a systematic solution regarding the reporting component to ensure managers and supervisors complete EEO Supervisory discussions. [...] EEO is currently working with ITS to modify and revise the current tracking system and report format. This will enable EEO to advise managers and supervisors on January 1st and July 1st that the EEO Supervisory Discussions are to be completed within the months of January and July. During February and August, compliance reports will be created which will

identify any manager or supervisor who has not held their discussion. These reports will be shared with DSS/HRA/DHS Chiefs, who can facilitate compliance amongst their staff.” (Agency Response pg. 5)

EEPC Response: The EEPC recognizes the agency’s efforts to implement corrective action **#8**. To demonstrate implementation of the agency’s new reporting system and its described functions, please provide a copy of a compliance report generated from the agency’s revised tracking system and documentation of the expectation that managers and supervisors are held accountable for enforcing the agency’s sexual harassment prevention policies and complaint procedures.

Thank you and your staff for your continued cooperation.

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

RESOLUTION #2018AP/225-069-071-(2018): Final Determination pursuant to the Audit: Review, Evaluation and Monitoring of the Department of Social Services' (Human Resources Administration and Department of Homeless Services) Sexual Harassment Prevention and Response Practices from January 1, 2016 through December 31, 2017.

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 ensure equal employment opportunity for minority group members and women; and

Whereas, pursuant to Chapter 36, Section 831(d)(2), this Commission has adopted *Uniform Standards for EEPC Audits* and *Minimum Equal Employment Opportunity Standards for Community Boards* to assess agencies' EEO programs and policies for compliance with federal, state and local laws, regulations, policies and procedures designed to increase equality of opportunity for women, minorities, and other employees and job applicants identified for protection from discrimination in employment within municipal government; and

Whereas, pursuant to its audit of the Department of Social Services' (Human Resources Administration and Department of Homeless Services) (DSS-HRA-DHS) Sexual Harassment Prevention and Response Practices, the Equal Employment Practices Commission (EEPC) issued a Preliminary Determination letter, dated October 5, 2018, setting forth findings and the following required corrective actions:

1. Establish and implement a training plan for new and existing employees to ensure that all individuals who work within the agency, including managers and supervisors, receive training on the prevention of sexual harassment as well as discrimination complaint and investigation procedures.
2. Serve the respondent with a notice of the complaint that includes the respondent's right to respond to the allegations and right to be accompanied by a representative of his/her choice. Maintain in the complaint file documentation regarding the service of notice on the respondent.
3. Issue a conclusive report within 90 days of the date the complaint was filed. Commence an investigation immediately if allegations raised sufficiently warrant an investigation.
4. In rare circumstances where a complaint investigation cannot commence immediately, or where a conclusive report cannot be issued within 90 days, specify in the complaint file the reason for the delay and project a time frame for completion of the report. Notify the complainant and respondent of the delay.
5. Establish and implement a policy whereby the agency head (or an approved direct report other than the General Counsel) reviews the principal investigator's conclusive report; issues a written/electronic determination adopting, rejecting, or modifying the

recommended action; and signs each determination, via writing or electronically, to indicate it has been reviewed and adopted.

6. Inform each complainant and respondent of the conclusion and outcome of their complaint investigation in writing as part of the agency's complaint procedure.
7. Maintain documentation regarding directives or decisions between the agency head (or a direct report other than the General Counsel) and the principal EEO Professional that impact the administration and operation of programs, policies or procedures concerning sexual harassment.
8. Ensure that managers and supervisors are held accountable for enforcing the agency's sexual harassment prevention policies and complaint procedures. Document this expectation and its implementation.
9. Submit to the EEPC an Annual Plan of measures and programs to provide equal employment opportunity, and quarterly reports on efforts to implement the Plan within 30 days following each quarter. Include a breakout of sexual harassment complaint activity in each quarterly report.

Whereas, the agency submitted its response to the EEPC's Preliminary Determination letter on October 19, 2018; with documentation of its actions to rectify required corrective action no. 9; and

Whereas, in accordance with Chapter 36, Section 832(c) of the New York City Charter, the EEPC considered the agency's response and issued a Final Determination on October 30, 2018 which agreed and indicated that corrective action(s) nos. 1 through 8 require compliance monitoring; and

Whereas, in accordance with Chapter 36, Section 832(c) of the City Charter, the EEPC is required to monitor the agency for a period not to exceed six months, from November 2018 through April 2019, to determine whether it implemented the remaining required corrective actions; and

Whereas, in accordance with Chapter 36, Section 832(c) of the City Charter, the agency is required to respond in 30 days and make monthly reports thereafter to the Commission on the progress of its implementation of such corrective actions; and

Whereas, all of the EEPC's corrective actions are required by, or are consistent with, federal, state and local laws, regulations, policies and procedures designed to increase equality of opportunity for women, minorities, and other employees and job applicants identified for protection from discrimination in employment within municipal government; Now Therefore,

Be It Resolved, that the Commission approves issuance of this Final Determination to Department of Social Services Commissioner Steven Banks.

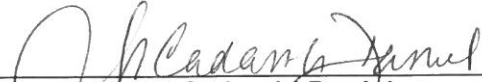
Approved unanimously on November 29, 2018.

absent

**Angela Cabrera
Commissioner**



**Arva Rice
Commissioner**



**Malini Cadambi Daniel
Commissioner**



**Elaine S. Reiss, Esq.
Commissioner**



**Department of
Social Services**

Human Resources
Administration

Department of
Homeless Services

Steven Banks
Commissioner

**150 Greenwich Street
New York, NY 10007**

929 221 7315

W-1
Rev. 12/16

November 27, 2018

Charise L. Terry, PHR
Executive Director of EEPC
253 Broadway, Suite 602
New York, NY 10007

Re: Corrective Action Plan Update
following the Final Audit Report on the
Evaluation and Monitoring of
DSS' (Human Resources Administration
& Department of Homeless Services)
Sexual Harassment Prevention and
Response Practices January 1, 2016
– December 31, 2017
Audit: #2018AP/225-069-071(2018)

Dear Ms. Terry:

Thank you for sharing with us the Final report for Audit: Review, Evaluation and Monitoring of the Department of Social Services' (Human Resources Administration and Department of Homeless Services) Sexual Harassment Prevention and Response Practices dated October 30, 2018. We have reviewed the referenced report, and our responses are enclosed.

DSS/Equal Employment Opportunity Office has prepared and attached a Corrective Action Plan that identifies the actions that we have already taken or will take in the future to address any issues. We remain committed to ensuring proper policies and procedures are adhered to, and will continue to work with DCAS to ensure that the agency is in compliance with the required EEO Sexual Harassment training.

We are confident that our response demonstrates our commitment to improve our operations going forward. Should you have any questions, please contact Sonia Lamhari, Director of the DSS Bureau of Audit Coordination at 929-221-5724.

Sincerely,

Steven Banks

Steven Banks
Commissioner

MEMORANDUM

Stephanie Grant
Assistant Deputy Commissioner
EEO Officer

TO: All Employees

FROM: Commissioner Steven Banks

DATE: 4/29/2019

RE: Equal Employment Practices Commission Audit of the Department
of Social Services

150 Greenwich Street
New York, NY 10007

929 221 5139

The New York City Equal Employment Practices Commission (EEPC) recently conducted an audit and evaluation of the Department of Social Services (DSS) Sexual Harassment Prevention and Response Practices, consistent with its New York City charter mandated responsibility to audit the employment practices, policies and procedures of every City agency once every four years. The EEPC conducts audits to ensure agency compliance with federal, state and local laws, regulations, policies, and procedures designed to increase equality of opportunity for City employees and job applicants. EEPC's most recent audit of DSS covered the period from January 1, 2016 to December 31, 2017.

The EEPC found that DSS was generally in compliance with the law and policies, and identified certain areas for corrective action. The following is a summary of the corrective actions:

- Implemented changes to EEO policies and procedures prohibiting sexual harassment, and will incorporate these into the DSS prospective Annual Equal Employment Opportunity Plans.
- Incorporated EEO training into the New Hires Orientation to ensure that all new staff are trained on the EEO policy, including sexual harassment prevention.
- Updated policies and procedures to ensure uniform implementation of complaint investigation procedures consistent with the NYC EEO Policy.
- Submit to the EEPC an annual plan of the measures and programs to provide equal employment opportunity, and quarterly reports on efforts to implement the plan within 30 days following each quarter, including

a breakout of sexual harassment complaint activity in each quarterly report.

- Ensure that managers and supervisors are held accountable for enforcing the agency's sexual harassment prevention policies and complaint procedures and document this expectation and its implementation.
- Ensure that managers and supervisors will be held accountable for conducting EEO supervisory discussions twice per year.
- Maintain agendas and minutes to memorialize meetings with the Commissioner regarding the administration and operation of EEO programs, policies and procedures.

As Commissioner, I hereby reaffirm my commitment to the DSS Equal Employment Opportunity program and the prevention of sexual harassment. I take this opportunity to reaffirm our agency's strong commitment to maintaining a workplace and employment practices free from unlawful discrimination and harassment for all of our employees and applicants for employment. I am firmly committed to preventing discrimination and sexual harassment by ensuring that all employees are aware of their rights and obligations under the Equal Employment Opportunity policy and by encouraging a work environment that respects and celebrates the vast diversity within the agency. Thank you for sharing in this commitment.



**RESOLUTION NO.
2018AP/230-069071-(2019)C10
Department of Social Services
Commissioner Steven Banks
Sexual Harassment Prevention and Response Practices
DETERMINATION: COMPLIANCE**

SYNOPSIS

Corrective Action(s)	Total: 9		
Period Audit Covered	January 1, 2016 to December 31, 2017		
Preliminary Determination Issued	October 5, 2018	Response Received	October 19, 2018
Final Determination Issued	October 30, 2018	Response Received	November 27, 2018
Compliance-Monitoring	Required	November 1, 2018 to April 30, 2019 without extension	

Whereas, pursuant to Chapter 36, Sections 830(a) and 831(d)(2) and (5) of the New York City Charter (Charter), the Equal Employment Practices Commission (EEPC) is authorized to audit, review, evaluate, and monitor the employment procedures, practices and programs of city agencies and other municipal entities (hereinafter "entities") and their efforts to ensure fair and effective equal employment opportunity (EEO) for minority group members and women who are employed or seek employment, and to recommend practices, procedures, approaches, measures, standards, and programs to be utilized by such entities in these efforts; and

Whereas, pursuant to Charter Chapter 36, Sections 830(a) and 831(d)(2) and (5), the EEPC has adopted uniform standards for auditing agencies and municipal entities, and minimum standards for auditing community boards, to review, evaluate, and monitor entities' practices, procedures, approaches, measures, standards, and programs for compliance with federal, state, and local laws and regulations, and policies and procedures to increase equal opportunity for women, minorities, and other employees and job applicants identified for protection from discrimination; and

Whereas, in accordance with Charter Chapter 36, Section 832(c), the EEPC may make a determination pursuant to Charter Section 831(d) whether any plan, program, procedure, approach, measure, or standard adopted or utilized by any municipal entity does not provide equal employment opportunity, and the EEPC's determinations of compliance or non-compliance and prescribed corrective action are required by, or consistent with federal, state, and local laws and regulations, and policies and procedures to increase equality of opportunity for women, minorities, and other employees and job applicants identified for protection from discrimination; and

Whereas, the EEPC conducted an audit, review, and evaluation of the Department of Social Services' Sexual Harassment Prevention and Response Practices; and

Whereas, pursuant to the audit, review, and evaluation of the Department of Social Services' Sexual Harassment Prevention and Response Practices, the EEPC issued a Preliminary Determination, dated October 5, 2018, setting forth findings and the following corrective actions required to remedy areas of non-compliance:

1. Establish and implement a training plan for new and existing employees to ensure that all individuals who work within the agency, including managers and supervisors, receive training on the prevention of sexual harassment as well as discrimination complaint and investigation procedures.
2. Serve the respondent with a notice of the complaint that includes the respondent's right to respond to the allegations and right to be accompanied by a representative of his/her choice. Maintain in the complaint file documentation regarding the service of notice on the respondent.
3. Issue a conclusive report within 90 days of the date the complaint was filed. Commence an investigation immediately if allegations raised sufficiently warrant an investigation.
4. In rare circumstances where a complaint investigation cannot commence immediately, or where a conclusive report cannot be issued within 90 days, specify in the complaint file the reason for the delay and project a time frame for completion of the report. Notify the complainant and respondent of the delay.
5. Establish and implement a policy whereby the agency head (or an approved direct report other than the General Counsel) reviews the principal investigator's conclusive report; issues a written/electronic determination adopting, rejecting, or modifying the recommended action; and signs each determination, via writing or electronically, to indicate it has been reviewed and adopted.
6. Inform each complainant and respondent of the conclusion and outcome of their complaint investigation in writing as part of the agency's complaint procedure.
7. Maintain documentation regarding directives or decisions between the agency head (or a direct report other than the General Counsel) and the principal EEO Professional that impact the administration and operation of programs, policies or procedures concerning sexual harassment.
8. Ensure that managers and supervisors are held accountable for enforcing the agency's sexual harassment prevention policies and complaint procedures. Document this expectation and its implementation.
9. Submit to the EEPC an Annual Plan of measures and programs to provide equal employment opportunity, and quarterly reports on efforts to implement the Plan within 30 days following each quarter. Include a breakout of sexual harassment complaint activity in each quarterly report.

Whereas, within a two-week deadline following the EEPC's Preliminary Determination, the entity submitted a preliminary response; and

Whereas, in accordance with Charter Chapter 36, Section 832(c), after consideration, the EEPC issued a Final Determination on October 30, 2018, which indicated that the following areas required corrective action: no(s). 1, 2, 3, 4, 5, 6, 7, and 8; and

Whereas, in accordance with Charter Chapter 36, Section 832(c), in the Final Determination, the EEPC assigned a monitoring period from November 1, 2018 to April 30, 2019, to determine

whether the entity eliminated areas of non-compliance, if any; and

Whereas, in accordance with Charter Chapter 36, Section 832(c) the entity was required to respond in 30 days, and make monthly reports thereafter for a period not to exceed six months, on the progress of its efforts to correct outstanding areas of non-compliance; and

Whereas, in accordance with Charter Chapter 36, Section 832(c), on November 27, 2018, the entity issued a response to the EEPC's Final Determination; and

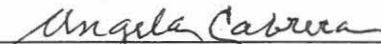
Whereas, in accordance with Charter Chapter 36, Section 832(c), the Department of Social Services was monitored until April 29, 2019; and

Whereas, pursuant to Charter Chapter 35, Sections 815(a)(15) and (19), which requires agency heads to ensure and promote equal opportunity for all persons in appointment, payment of wages, development, and advancement, and to establish measures and programs to ensure a fair and effective affirmative employment plan to provide equal employment opportunity for minority group members and women, the Commissioner submitted a copy of a memorandum to staff dated April 29, 2019, which recognized the EEPC's audit and reiterated commitment to the Department of Social Services' equal employment practices; Now Therefore,

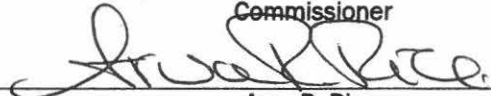
Be It Resolved, that the Department of Social Services has satisfied the equal employment standards set by the EEPC pursuant to its authority under New York City Charter Chapters 35 and 36; and

Be It Resolved, that the EEPC's Board of Commissioners approves the issuance of this Determination of Compliance to Commissioner Steven Banks of the Department of Social Services.

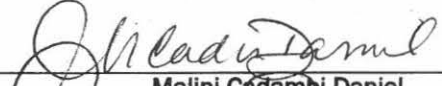
Approved unanimously on May 21, 2019.



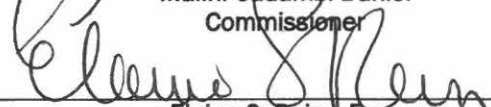
Angela Cabrera
Commissioner



Arva R. Rice
Commissioner



Malini Cadambi Daniel
Commissioner



Elaine S. Reiss, Esq.
Commissioner



**Equal Employment
Practices Commission**

BY MAIL AND EMAIL

Vacant
Chair

May 21, 2019

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

Steven Banks
Commissioner
Department of Social Services
150 Greenwich Street, 42nd Floor
New York, NY 10007

Charise L. Terry, PHR
Executive Director

Re: Resolution #2018AP/230-069071-(2019)C10
DETERMINATION: Compliance

Judith Garcia Quiñonez, Esq.
Executive Agency Counsel/
Director of Learning and Development

Dear Commissioner Banks:

Jennifer Shaw, Esq.
Executive Agency Counsel/
Director of Compliance

On behalf of the members of the Equal Employment Practices Commission (EEPC), I write to inform you that pursuant to New York City Charter Chapter 35, Sections 815(a)(15) and (19), which requires agency heads to ensure and promote equal opportunity for all persons in appointment, payment of wages, development, and advancement, and to establish measures and programs to ensure a fair and effective affirmative employment plan to provide equal employment opportunity (EEO) for minority group members and women, the EEPC's Board of Commissioners has approved the attached Determination.

253 Broadway
Suite 602
New York, NY 10007

212. 615. 8939 tel.
212. 676. 2724 fax

Thank you and EEO Officer Stephanie Grant for the cooperation extended to the EEPC during the course of our review, evaluation, and monitoring of your agency's employment and EEO-related practices.

Sincerely,

Arva R. Rice
Commissioner

Enc.

C: Stephanie Grant, EEO Officer, Department of Social Services

This

Determination of Compliance

is hereby issued to

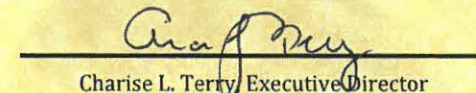
Department of Social Services

for successful implementation of 9 of 9 required corrective action(s),
thereby achieving compliance with the Equal Employment Practices Commission's
Sexual Harassment Prevention and Response Practices Audit
from January 1, 2016 to this date.

On this 21st day of May in the year 2019,



Arva R. Rice, Commissioner



Charise L. Terry, Executive Director

In care of Commissioner Steven Banks
and Principal EEO Professional Stephanie Grant