



THE CITY OF NEW YORK
DEPARTMENT OF SMALL BUSINESS SERVICES

ROBERT W. WALSH
COMMISSIONER

12-09-05 RCVD 8693

September 7, 2005

Ernest F. Hart, Esq.
Chair
Equal Employment Practices Commission
40 Rector Street, 14th Floor
New York, New York 10006

RE: Resolution #05/11-801 Preliminary Determination Pursuant to the Audit of the Department of Small Business Services (SBS) and its Compliance with the City's Equal Employment Opportunity Policy from July 1, 2002 through June 30, 2004

Dear Mr. Hart:

In response to your letter dated July 28, 2005 describing the recent audit of SBS and its compliance with the City of New York's Equal Employment Opportunity Policy, set forth below please find SBS's response to each recommended corrective action:

Recommended Corrective Action 1:

A "Complaint of Discrimination" intake form should be given to all complainants and used when an internal complaint is filed (Sect. 12(a), DCPIG)

Reply:

The Complaint file reviewed for EEPC's audit took place under the agency's prior EEO/EO Officer. Currently, SBS uses a "Complaint Information Form" for each complaint. This "Complaint Information Form" was provided to the auditors on both July 26, 2005 and August 12, 2005. The "Complaint Information Form" is substantially similar to the DCAS form and contains additional inquiries. Consequently, no corrective action should be necessary for this measure. (Refer to Attachment 1 "Complaint Information Form")

Recommended Corrective Action 2:

Each complaint file should contain a "Notice of Discrimination Complaint" form to notify the respondent of the allegations being made (Sect. 12(b) DCPIG)

Equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities.

Reply:

The complaint reviewed by EEPC was drafted by the agency's previous EEO/EO Officer. All complainants and respondents will receive "Notices of Acknowledgment" upon our office's receipt of their complaints. The "Notice of Acknowledgment" discusses the allegations in the complaint, identifies the involved parties and remedy(ies) sought. Consequently, no corrective action should be necessary for this measure (Refer to Attachment 2 "Notices of Acknowledgment to Grievant and Respondent"). Note: although these sample letters are from grievances against the agency and its Workforce1 program, the same procedure would be followed for complaints of discrimination.

Recommended Corrective Action 3:

The EEO Officer should submit a confidential written report to the agency head, which consists of the 3 sections outlined in the DCPIG: (1) Findings of Facts; (2) Discussion and Conclusion; and (3) Recommendations. (Sect. 12(b), DCPIG)

Reply:

The current EEO/EO Officer issues memorandums to the First Deputy Commissioner in instances of EEO complaints. The First Deputy Commissioner is a direct report to the agency's Commissioner. The EEO/EO Officer reports directly to the First Deputy Commissioner and has regular meetings with him on EEO issues and whenever allegations of discrimination arise.

During the current EEO/EO Officer's tenure, the agency has not received any formal complaints, however when informal incidents transpire, memorandums are drafted containing the following: (1) findings of facts; (2) a discussion/analysis of the issues; and (3) a conclusion. Subsequent to meeting with the First Deputy Commissioner another memorandum is drafted containing recommended actions; this memorandum is also provided to involved supervisors. Consequently, corrective action should not be required under this measure.

Recommended Corrected Action 4:

The agency head must sign each report to indicate that it has been reviewed and whether the recommendation, if any, is approved and adopted. (Sect. 12 (b) DCPIG)

Reply:

During the current EEO/EO Officer's tenure, the agency has not received any formal complaints. In the case of a formal complaint the EEO/EO Officer will obtain the agency head's signature if necessary to attain compliance with this measure. It is unclear if corrective action is necessary for this measure since the First Deputy Commissioner, who is a direct report to the Commissioner, would currently act in this capacity.

Recommended Corrective Action 5:

SBS should ensure that job vacancies for which underutilization of women and/or minorities have previously been identified will be advertised in female and minority oriented publications, and sent to professional and community organizations serving minorities, women and persons with disabilities. SBS should use the list of minority and female recruitment sources compiled by DCAS ("Making the Most of New York City's Recruitment Resources," 2004, http://extranet.dcas.nycnet/eoo/pdf/apomasterclass_recruitment.pdf). (Sect. IV EEOP)

Reply:

EEPC found an underutilization of Hispanics in the Paraprofessional and Clerical Supervisor job groups. A review of SBS's CEEDS data for the fourth quarter of fiscal year 2005 indicates that SBS does not currently have an underutilization of Hispanics in the Clerical Supervisor job group.

According to CEEDS, the expected number of Hispanics for the Clerical Supervisor job group is 7.66 persons. The Office of Federal Contract Compliance Programs (OFCCP) guidelines would round this number down, thus 7 Hispanics would actually be required in this job group. CEEDS states that the agency has 45 persons in this job group. However SBS's personnel records for the fourth quarter of fiscal year 2005, show 42 persons in this job group, 9 of whom are Hispanic. Consequently, it appears Hispanics are not underutilized in this category. It should also be noted that upon our review and comparison of CEEDS data, the EEO Officer and the Director of Personnel/Career Advisor, Nancy Gannie, found that there is a time lag in CEEDS's tracking of promotions and transfers that would account for this difference.

When recruiting for positions in groups that have been identified to be underutilized, as well as for general recruiting efforts, the agency's Human Resources Division has been instructed to use DCAS's guide, "Making the Most of New York City's Recruitment Resources".

Specifically, the agency engages in targeted recruitment of Hispanics and women. SBS will seek to develop relationships with the following organizations: the Dominican Chamber of Commerce; the Hispanic Federation; the Federation of Puerto Rican Organizations; the Hispanic Women's Chamber of Commerce and colleges affiliated with the Hispanic Association of Colleges and Universities (i.e. City College, Lehman College, LaGuardia, John Jay, and the New York City College of Technology).

Previously, the agency has attended career fairs at New York University and for some positions sought candidates from Columbia University's Multi-Cultural Center. The agency plans to attend the following career fairs: Fordham University's -All Student Career Fair; New York University's -Wagner School of Public Service Career Fair; Baruch University's School of Public Service/Government Careers and the Zicklin School of Business Career Fairs

The agency will also advertise in "El Diario", Caribe News and "Hoy", subject to budget limitations.

Recommended Corrective Action 6:

SBS should secure necessary training to conduct adverse impact studies, either from DCAS or another appropriate source. (Sect. IV. EEOP)

Reply:

On November 15, 2004, SBS's EEO Officer asked Jyll Townes of DCAS about obtaining additional adverse impact training. Ms. Townes noted that her office provided adverse impact training in their EEO Officer and Personnel Director training session in October of 2004. The EEO officer attended this training session. SBS will look into obtaining additional adverse

impact training from external sources, and would welcome guidance from the EEPC identifying additional entities that offer adverse impact training.

Recommended Corrective Action 7:

SBS's Commissioner should distribute a memo to all managers/supervisors informing them that the "Utilizing Human Resources" section of their annual performance evaluation form includes tasks and standards relevant to EEO performance that will be considered in determining their eligibility for promotions or merit increases. (Sect. IV, EEOP)

Reply:

SBS's Commissioner will distribute a memorandum to all managers/supervisors informing them that the "Utilizing Human Resources" section of their annual performance evaluation form includes tasks and standards relevant to EEO performance that will be considered in determining their eligibility for promotions or merit increases. As was agreed at the SBS Exit Conference, SBS's EEO Officer is awaiting a sample form that incorporates these inquiries from EEPC. Upon obtaining this sample form, SBS will add these fields to its form which will also accompany the Commissioner's memorandum. (Refer to Attachment 3 for Commissioner's Memorandum")

Recommended Corrective Action 8:

SBS should re-distribute information about the identities, location and telephone numbers of the Career Counselors to all agency employees. (Sect. IV, EEOP).

Reply:

SBS readily provides this information to employees in a distribution bin outside of the EEO Officer's office. However, in order to effectuate compliance with this recommended corrective action, SBS will re-distribute a fact sheet detailing the location and services of the Career Advisor to all employees.

Additional Corrective Action:

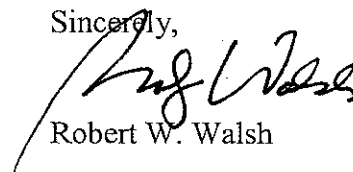
The Commission requires that the agency head distribute a memorandum to all staff informing them of the changes that are being implemented in the agency's EEO program pursuant to the audit. This memorandum should re-emphasize the agency head's commitment to the agency's Equal Employment Opportunity Program.

Reply:

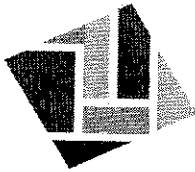
SBS's Commissioner will distribute the aforementioned memo. (Refer to Attachment 3)

I thank you and your staff for their efforts in conducting the recent audit of our agency, and we look forward to working with your office to improve our agency's cultural diversity and awareness.

Sincerely,



Robert W. Walsh



COMPLAINT AND MEDIATION PROCEDURES

I) The Complaint Procedure

a) Who may file a complaint?

Any person who is a participant in a WIA Title I financially assisted program or activity, and is lawfully authorized to work in the United States.

A person may file:

- 1) on their own behalf;
- 2) on behalf of an individual (as an authorized representative); or
- 3) on behalf of any specific class of individuals.

b) What are the bases of a discrimination complaint?

A complaint of discrimination must be based on one or more of the following classifications:

<ul style="list-style-type: none">• Race• Color• Religion• Sex• National Origin	<ul style="list-style-type: none">• Age• Disability• Political Affiliation• Belief or• Citizenship status
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c) What are the requirements for filing a complaint?

- Complaints **must** be filed within **180 days** of the alleged incident.
- Complaints must also be in **WRITING** and must contain the following information:
 - The complainant's name and address or other means of contact.
 - Respondent's identity or the entity responsible for the alleged discrimination.
 - A description of the allegations with enough detail to establish:
 - 1) WIA Title I jurisdiction over the complaint;
 - 2) Whether the complaint was filed within the required 180 day time period;
 - 3) Whether the complaint has apparent merit; and

Equal Opportunity Employer/Program. Auxiliary aids and services are available upon request to individuals with disabilities.



4) Whether the allegations would violate any of the nondiscrimination and equal opportunity provisions of WIA.

- The complainant's or their authorized representative's signature.

d) When to File?

Complaints must be filed within **180 days** from the initial date of occurrence. Complainants who file with an EO Officer must wait until a written Notice of Final Action is received or until **90 days** have passed (whichever is sooner) before filing with the Civil Rights Center (CRC). The Director of CRC for good cause shown may extend the filing period beyond 180 days.

e) Where to File?

Complaints may be filed with the LWIA (Local Workforce Investment Act) EO Officer:

110 William Street 8th floor
New York, New York, 10038
Attn: LWIA Equal Opportunity Officer, Special Hagan

Or

Complainants may also seek to file directly with the:

United States Department of Labor
Civil Rights Center
200 Constitution Avenue, N.W. Room N-4123
Washington, D.C. 20210.
Attn: Director

**f) When a complaint involves two or more programs?
Questions of Jurisdiction**

A complaint will face questions of jurisdiction either when:

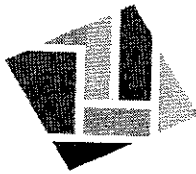
- 1) the complaint stems from an incident that has no connection to a WIA funded program or activity;

or

- 2) two or more entities are involved

1) The Complaint has no connection to a WIA funded program or activity

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If it is determined that the LWIA EO Officer does not have jurisdiction or authority to process the complaint, the complainant will be notified accordingly. Notification of a lack of jurisdiction will include an explanation for the determination, and filing information. If it is found that there is a lack of jurisdiction, the complainant has a right to file their complaint with the Civil Rights Center (CRC) within **30 days** from when they received the lack of jurisdiction notice.

2) Two or more entities are involved

If it is determined that the EO Officer has joint jurisdiction over the complaint (e.g. meaning that the complaint involves allegations against a WIA funded program and another entity), the complaint will be forwarded to the appropriate Equal Opportunity Officer and the complainant will be notified accordingly.

However, if a complaint is related to programs administered by the New York State Department of Labor (NYSDOL), complainants should address their complaints to the:

New York State Department of Labor,
Division of Equal Opportunity Development
State Campus Building 12, Room 540
Albany, New York 12240
Attn: Andrew Adams, WIA EO Officer

g) *Additionally*

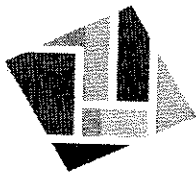
- All parties to the complaint are entitled to representation of their own choosing and at their own expense.
- Upon receipt by the EO Officer, Complaints are assigned a case number, recorded on the complaint log and forwarded to the appropriate Equal Opportunity Officer. All complaints are handled and maintained confidentially.

II) MEDIATION AS AN ALTERNATIVE TO THE FORMAL COMPLAINT PROCESS

a) What is Mediation?

Mediation is an efficient, informal, and confidential alternative to the discrimination complaint process. It involves a good faith agreement by the complainant and the respondent to meet with a neutral mediator to reach a mutually acceptable resolution of their issue(s).

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Complainants will not be offered mediation as an option in instances where there are threats of or the actual occurrence of violence.

b) An Overview of the Mediation Process

- When a discrimination complaint is received, the EO Officer sends a **Statement of the Issues**. The Complainant has **10 days** from receipt of the Statement of the Issues to choose mediation in lieu of the formal discrimination complaint process.
- In order to formally initiate the mediation process, the complainant and respondent must sign a "**Consent to Mediate**" form.
- Once the "Consent to Mediate" form has been completed, the EO Officer will contact one of New York State's thirty-three (33) regional Community Dispute Resolution Centers (CDRC).
- The mediator will then assume jurisdiction of the complaint for **sixty (60) days**. **Note:** this sixty day period starts upon the CDRC's receipt of the initial written referral from the EO Officer.
- The CDRC will then schedule a meeting(s) consisting of: the complainant, the respondent, and a trained mediator. **Note:** either party may also opt to have a representative accompany them.
- Within the 60 day period the mediator will conduct a mediation session(s). If the parties reach an agreement the mediator will assist them in memorializing their understanding in writing.
- Upon completion of the mediation process or within **ninety (90) days** of the EO Officer's receipt of the original complaint of discrimination, the complainant and respondent will receive a **Notice of Final Action** indicating the outcome of the proceedings.
- The Notice of Final Action will also provide instructions that the complainant has **thirty (30) days** from their receipt of the notice, to file an appeal with the U.S. Department of Labor's Civil Rights Center.

c) Protection from Intimidation, Reprisal, and Retaliation

- ***All parties to a discrimination complaint mediation are protected from intimidation, reprisal, and retaliation.***



d) Confidentiality

- Unless the parties agree otherwise, mediation sessions will be closed to anyone other than the individual parties and their representatives. Outside of what is necessary to effectuate the terms of the agreement, any communications and information disclosed during the course of the mediation process is privileged and confidential. Copies of the mediation agreement will be filed with the Equal Opportunity Officer, where they will be stored for **three (3) years** and subject to review by the U.S. Department of Labor's Civil Rights Center.

e) Breach of the Mediation Agreement

- Written mediation agreements are binding on all parties. If a non-breaching party determines that the agreement has been breached, they will have **30 days** from when the breach was discovered to file a complaint with the Director of the U.S. Department of Labor's Civil Rights Center (CRC). If the Director of the Civil Rights Center determines that a breach occurred, then the complainant will be permitted to file a new complaint of discrimination.



Complaint Information Form

Complainant's Information	
<p>1) Name: _____</p> <p>Address: _____</p> <p>Social Security Number: <i>(disclosure of SS# is voluntary)</i></p>	<p>2) Home Phone _____ Area Code _____ Number _____</p> <p>3) Work Phone _____ Area Code _____ Number _____</p> <p>4) Cell Phone _____ Area Code _____ Number _____</p>
Respondent's Information	
<p>5) <i>In the space provided, list the name of the individual(s) and the location of the alleged incident. (if more space is needed attach additional sheet(s))</i></p>	<p>6) _____ <i>Provide the date the first incident took place:</i> <i>Date of Most Recent Occurrence</i> _____</p>
<p>7) To the best of your knowledge, which of the following Department of Labor programs were involved? (Check one)</p> <p><input type="checkbox"/> Workforce1 Career Center</p> <p><input type="checkbox"/> Unemployment Insurance</p> <p><input type="checkbox"/> Employment Service</p> <p><input type="checkbox"/> Trade Adjustments Assistance</p> <p><input type="checkbox"/> Older Americans</p>	<p>8) Basis of Complaint: Which of the following best describes why you believe you were discriminated against: (Check)</p> <p><input type="checkbox"/> Race: Specify _____ <input type="checkbox"/> Age D.O.B. _____ (mm/dd/year)</p> <p><input type="checkbox"/> Color: Specify _____</p> <p><input type="checkbox"/> Religion: Specify _____ <input type="checkbox"/> Disability _____</p> <p><input type="checkbox"/> National Origin: Specify _____</p> <p><input type="checkbox"/> Sex: Specify <input type="checkbox"/> Male <input type="checkbox"/> Female</p> <p><input type="checkbox"/> Political Affiliation (specify) _____</p> <p><input type="checkbox"/> Citizenship (specify) _____</p>
<p>9) Do you think the discrimination against you had an effect on: (Check one)</p> <p><input type="checkbox"/> Your job or your job search? or <input type="checkbox"/> Your use of the facilities or someone providing/not providing you with services or benefits?</p>	
<p>10) Explain as briefly and as clearly as possible what happened and how you were discriminated against. Be sure to indicate who was involved and how other persons were treated differently from you. If necessary, you may also attach additional written material pertaining to your case.</p>	
<p>11) What other information do you think is relevant to our investigation?</p>	



12) *If this complaint is resolved to your satisfaction, what remedies do you seek?*

13) *Please list below any persons (witnesses, fellow employees, supervisors, or others) that we may contact for additional information to further support your response (if necessary feel free to attach additional written material)*

14) **Have you filed a case or complaint with any of the following?**

- Civil rights Divisions, U.S. Dept. of Justice
- U.S. Equal Employment Opportunity Commission
- Federal or State Court
- Your State or local human relations/rights commission

15) **For each item checked above, please provide the following information (if you have checked more than one attach additional pages).**

Agency:	Location of agency or Court:
Date Filed:	Name of Investigator:
Case or Docket Number:	Status of Case:

16)

Signature
(the complaint is not valid unless it is signed)

Date



Consent Form

I understand that the following provisions from the Privacy and Freedom of Information Acts apply to the personal information I reveal to the Department of Small Business Services (SBS) in connection with my complaint;

In order to obtain the information needed to investigate my complaint, I understand that SBS may have to reveal my identity to involved parties and staff members.

However, I do not have to reveal any personal information to SBS, but SBS may close my complaint if I refuse to reveal the information necessary to complete its investigation;

I may request and receive a copy of any personal information SBS keeps in my complaint file for investigatory purposes; and

Under certain conditions, SBS may be required by the Freedom of Information Act to reveal to others the personal information I have provided in connection to my complaint.

YES, SBS MAY DISCLOSE MY IDENTITY IF IT IS FOUND TO BE NECESSARY TO INVESTIGATE MY COMPLAINT. I have read and understand the notice, and I give SBS consent to process my complaint.

(Signature)

(Date)

NO, SBS MAY NOT DISCLOSE MY IDENTITY, EVEN IF IT IS FOUND TO BE NECESSARY TO PROCESS MY COMPLAINT. I have read and understand the notice, and I do not give SBS permission (consent) to disclose my identity during the course of its investigation. I request that SBS process my complaint however I understand that SBS may terminate the investigatory process if they are unable to proceed without disclosing my identity.

December 30, 2004

SEEDCO UMOs-WIA
215 West 125th Street
New York, NY 10037
Attn:

Dear Mr.

As you are aware, a racial discrimination complaint was recently filed with our agency by Mr. _____, a former SEEDCO employee. Mr. _____ complaint listed you, Ms. _____, Ms. _____, and Ms. _____ as parties to his complaint.

As part of our investigation we are requesting a meeting with you and the above named parties for Friday, January 7, 2005, at 11:00 am, at the Harlem One-Stop. This meeting will offer the parties named in the complaint to respond to these allegations.

If you have any questions regarding this meeting, please contact Mrs. _____ at (212) 618-6717 or myself at (212) 618-6719.

Sincerely,

Special Hagan
LWIA Equal Opportunity Officer

CF: Michelle Barnes-Anderson

Equal Opportunity Employer/Program. Auxiliary aids and services are available upon request to individuals with disabilities.

June 29, 2005

Ms.
97-16 Drew Street
Ozone Park, New York 11416

Dear Ms.

This is a letter to acknowledge the receipt of your grievance against American Software Technologies. You allege that the enrollment officer (Sarujeet) spoke to you in a rude and offensive manner and that you feel uncomfortable continuing your training at the facility. As a remedial measure, you are seeking to obtain another voucher to attend another school.

This office will conduct a preliminary investigation and will attempt to resolve the matter informally. If the matter cannot be resolved within the thirty (30) day informal hearing process then a formal hearing will be scheduled.

In the event your grievance results in a formal hearing, you and all the other interested parties will receive a Letter of Notice seven (7) days prior to the hearing. The Letter of Notice will list: the date; time; location of the hearing; and a summary of the issues. Within sixty (60) days from the date the original complaint was received, and or upon conclusion of the hearing process (whichever is sooner), the LWIA Grievance Officer will issue a written decision. If you are not satisfied with the decision at the formal hearing or if you do not receive a decision from our offices within 90 days from receipt of this letter, you may file an appeal with the New York State Department of Labor's (NYSDOL) WIA Hearing Officer.

Your appeal to the WIA Hearing Officer must be in writing and must be filed either within 15 days from the day you received the notice of determination from SBS or from the date that you should have received a decision from SBS.

You may file your appeal with:

WIA Hearing Officer
New York State Department of Labor
State Office Campus Building 12#, Room 446
Albany, New York 12240

NYSDOL shall then issue a decision within thirty (30) days from the receipt of your request. In order for your grievance to be processed by NYSDOL, your grievance must be written. The WIA Hearing Officer acts on behalf of the Governor, and has thirty (30) days from the date an appeal was requested to issue a decision.

If you are dissatisfied with the decision of the WIA Hearing officer you may also seek to file an appeal with the United States Department of Labor at the following address:

United States Department of Labor
Washington DC 2010
Attention: ASET

Appeals to the United States Department of Labor must also be sent at the same time directly to the State Workforce Investment Board. In order to file an appeal you must establish that you were not afforded your procedural rights according to the State plan.

Should you have any further questions about the above mentioned procedure or the status of your case, please feel free to contact Michelle Barnes-Anderson at (212) 618-6717.

Sincerely,

Special Hagan,
Director of EEO, EO LWIA Officer

CF: Michelle Barnes-Anderson
Michael James

Equal opportunity employer/program. Auxiliary aids and services are available upon request to persons with disabilities.

110 William Street * New York, NY 10038
Tel. 212.513.6300 * FAX 212.618.8865 * TDD 212.513.6306

July 1, 2005

American Software Technologies
36-41 Main Street, 2nd Floor
Flushing New York 11354

Dear Sir or Madam:

This letter is to inform you that a grievance has been filed against you by .
.. Ms. alleges that while attending classes at your facility that you failed to provide her with books or any other course materials.

Pursuant to 20 CFR 667.600 through 667.647, WIA title I recipients of financial assistance must afford customers the right to file grievances if they are dissatisfied with the services they have received. In accordance with our grievance procedure, in the upcoming weeks our office will be contacting you either during our informal resolution or investigatory processes. In an attempt to resolve this matter, we may need to schedule interviews with named staff members, review your attendance sheets or any other materials we deem necessary to complete our grievance process.

If you have any further questions please feel free to contact, Special Hagan, LWIA EO Officer at (212)618 6719.

Sincerely,

Special Hagan,
EO LWIA Officer, Director of EEO

C: Michelle Barnes-Anderson, LWIA Grievance Officer
Michael James, LWIA Grievance Officer

September 7, 2005

TO: All Staff

FROM: Robert Walsh
Commissioner

RE: Agency's Expanded EEO Program/Equal Employment Practices
Commission's Audit Findings

DATE: September 7, 2005

SBS has a commitment to equal employment opportunity. As an agency we have and will continue to evidence this commitment in our recruitment efforts, hiring practices, cultural diversity activities, and the services we provide to our staff members and customers.

In accordance with New York Human Rights Law, the agency prohibits discrimination on the following bases: race; color; national origin; religion, sex/gender; disability; age; arrest/conviction; marital status; genetic predisposition; carrier status; sexual orientation; gender identity; military status; and a person's status as a victim of domestic violence, sex offenses or stalking. Consequently, as an agency we are committed to ensuring that our employees and customers enjoy an environment that is free of discriminatory and or retaliatory conduct.

Pursuant to Chapter 36 of the New York City Charter, the Equal Employment Practices Commission (EEPC) has just completed its audit of our agency. The audit period examined the agency's employment practices, programs, policies and procedures from July 1, 2002 to June 30, 2004. Overall the audit found the agency to be in substantial compliance with City EEO Policy however, the following are areas where the agency will take additional steps to improve:

- 1) Including EEO tasks and standards in managers'/supervisors' performance evaluations;
- 2) Increasing staff members' awareness of the agency's Career Counseling services; and
- 3) Modifying and expanding our recruitment activities in order to increase the agency's diversity.

In closing, SBS celebrates and embraces our agency's diversity. In the upcoming months I encourage all staff members to participate in and look forward to: activities, training sessions, employment opportunities and outreach initiatives.

DRAFT