

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

**RESOLUTION #12/21-312:** Preliminary Determination Pursuant to the Audit of the New York City Conflict of Interest Board (COIB) and its compliance with the City's Equal Employment Opportunity (EEO) Policy and Federal, State and City equal employment opportunity requirements for the period from January 1, 2009 to December 31, 2011.

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

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

**Whereas**, the Equal Employment Practices Commission audited the New York City Conflict of Interest Board's Equal Employment Opportunity Program; and

**Whereas**, in accordance with Chapter 36, Section 832(c) of the City Charter, the EEPC may make a preliminary determination pursuant to Section 831(d) that any plan, program, procedure, approach, measure or standard adopted or utilized by any city agency does not provide equal employment opportunity. Now, Therefore,

**Be It Resolved**, that pursuant to the audit of the COIB's compliance with the city's Equal Employment Opportunity Policy, as well as Commission policies and EEO standards expressed in City guidelines, the Equal Employment Practices Commission hereby affirms and adopts the following preliminary finding:


1. COIB did not include the name and phone number of the EEO professionals in its EEO Policy Statement.
2. The agency's organization chart did not include the EEO Officer's title or its reporting relationship.

**Be It Finally Resolved**, that the Commission authorizes the Chair, Cesar A. Perez, Esq., to forward a letter to Executive Director Mark Davies of the findings with appropriate explanations and recommendations and requesting, pursuant to Chapter 36 of the City Charter, a response to these findings within thirty days of receipt of the letter indicating what corrective actions the COIB will take to bring it into compliance with the aforementioned policies and standards on equal employment opportunity.

Approved unanimously on July 26, 2012.

**Malini Cadambi Daniel**  
**Commissioner**

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

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