



EQUAL EMPLOYMENT PRACTICES COMMISSION

SUMMARY COMPLIANCE REPORT

Agency: Civilian Complaint Review Board

Agency Head: Florence L. Finkle, Executive Director

EEO Officer: Raymond Patterson

Audit Period: January 1, 2000 - June 30, 2002

Date of Preliminary Findings Letter: *May 8, 2003*

Date of Response Letter: *June 6, 2003*

Date of Final Determinations Letter: *July 11, 2003*

Compliance Initiated: *November 2003*

Compliance Completed: *April 2004*

Covering Months: *October 2003 - March 2004*

Date: May 20, 2004

Pursuant to the findings and recommendations of the Equal Employment Practices Commission's (EEPC) Audit of Compliance by the Civilian Complaint Review Board (CCRB) with the City's Equal Employment Opportunity Policy (EEOP), EEPC initiated Audit Compliance with CCRB on November 1, 2003. CCRB's Final Compliance Report was submitted on April 1, 2004. All thirteen required actions were completed or accepted.

The following is a summary of the compliance reports:

1. CCRB should issue a general EEO Policy Statement.

CCRB said that on March 31, 2004 it re-issued the Employee Manual that includes a general EEO Policy Statement. A copy of the revised Employee Manual was submitted.

The required action was completed in March 2004.

2. All EEO Policy Statements and Discrimination Complaint Procedures should be distributed to all employees.

CCRB stated that since June 2003 all newly hired CCRB employees receive a copy of the EEO

Policy Statement and Discrimination Complaint Procedure in their orientation package. A hard copy of the revised EEO Policy Statement, Discrimination Complaint Procedure and the Reasonable Accommodation Policy and Procedure was issued to all CCRB employees on January 29, 2004. In addition, all employees have access to the current EEO Policy Statements and Discrimination Complaint Procedures via the agency's computer system. CCRB submitted a copy of an e-mail that was sent to all employees informing them to pick up a copy of the Policies and Procedures during paycheck or pay stub distribution.

The required action was completed in January 2004

3. **The agency should follow Section VII of the Citywide EEO Policy and ensure that its EEO policies are available in formats accessible to applicants and employees with disabilities, e.g., audiocassette and Braille.**

CCRB stated that it has prepared a large print version of the EEO Policy. In addition, it has access to the Department of Citywide Administrative Services audiocassette and Braille version of the Citywide EEO Policies, if needed. CCRB submitted a one-page copy of the large print Policy.

The required action was completed in October 2003.

4. **To provide additional information and guidance to agency employees and EEO professionals, the CCRB should adopt and tailor the "Reasonable Accommodation Procedure" and "Request for Reasonable Accommodation" form contained in the Citywide EEO Policy.**

CCRB said it has issued a hard copy of the "Reasonable Accommodation Procedure" and "Request for Reasonable Accommodation" form to all staff on January 29, 2004. The document is also included in the Employee Manual that was re-issued in March 2004. CCRB submitted a copy of an e-mail that was sent to all employees informing them to pick up a copy of the Policies and Procedures during paycheck or pay stub distribution.

The required action was completed in January 2004.

5. **CCRB should obtain and distribute Section 55-A Program brochures issued by the Department of Citywide Administrative Services.**

CCRB stated that on May 8, 2003, it distributed the Section 55-A Program brochures to all employees and as of that date all new employees receive a copy of it in their orientation package.

The required action was completed in May 2003.

6. **The EEO Officer should be scheduled for DCAS training or attend Cornell University's School of Industrial and Labor Relations (EEO Studies Program).**

CCRB indicated that EEO Officer Ray Patterson and EEO Counselor Beth Thompson completed the DCAS training course during the summer of 2003. CCRB submitted copies of their certificates.

The required action was completed in November 2003.

7. **The EEO Officer should follow the Discrimination Complaint Procedures Implementation Guidelines (issued by DOP, now DCAS, in 1993).**

CCRB stated that it will follow the Discrimination Complaint Procedures Implementation Guidelines.

The response to the required action was accepted in September 2003.

8. **In keeping with Section 12 (b) of the Discrimination Complaint Procedures Implementation Guidelines (issued by DOP, now DCAS, in 1993), the investigator's written report should be addressed to and signed off by the agency head.**

CCRB stated that it will comply with the directive that the investigator's written report should be addressed to and signed off by the agency head. A copy of a signed investigator's written report by the agency head was submitted.

The required action was completed in October 2003.

9. **In keeping with section 12 (b) of the Discrimination Complaint Procedures Implementation Guidelines, the EEO investigator should always inform all parties to complaints in writing of the outcome of the investigation.**

CCRB stated that it will comply with the directive that the EEO investigator should always inform all parties to complaints in writing of the outcome of the investigation. Copies of notification letters to the complainant and the respondent were submitted.

The required action was completed in October 2003.

10. **CCRB should maintain and update a monthly discrimination complaint log. CCRB submitted a copy of a complaint log.**

CCRB said that it has created a log that will be updated monthly. A copy of a completed complaint log was submitted.

The required action was completed in October 2003.

11. **During previous audits, the Commission has found numerous EEO program deficiencies in agencies that did not have full-time EEO Officers. For this reason, the Commission has adopted the position that the agency EEO Officers should devote 100% of their time to EEO matters.**

CCRB stated that it is not able to comply with this action. CCRB stated that it is a relatively small agency of approximately 160 employees, which generates very few EEO complaints. Since the agency's inception in 1993, there have not been enough complaints filed to justify a position solely to EEO matters. In fact, during the 30-month audit period, CCRB employees

filed only four complaints. CCRB said to mandate that the EEO Officer spend 100% of his or her time on EEO matters, particularly in a time of fiscal crisis, would be a waste of resources.

The response to the required action was accepted in September 2003.

12. The EEO Officer should perform all of the EEO functions identified in the City's EEO Policy.

CCRB stated that the current EEO Officer and EEO Counselor share the EEO functions identified in the city's EEO Policy. Having either official perform only those duties assigned to their particular title or assume the other's title and role ignores the reality of the work environment at CCRB.

The response to the required action was accepted in September 2003.

13. The Executive Director should disseminate an agency-wide memorandum to discuss audit findings.

The attached memorandum from Executive Director Florence L. Finkle to the staff was distributed on March 31, 2004.

The required action was completed in March 2004.

Recommendation

Based on the above information, we recommend that the Equal Employment Practices Commission issue a Letter of Completion of Compliance to the Executive Director Florence L. Finkle of the Civilian Complaint Review Board informing her that her agency has implemented the recommended corrective actions to the Commission's satisfaction.

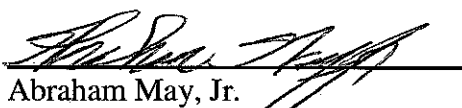
Respectfully Submitted,



Lisa Badner, Counsel



Eric Matusewitch
Deputy Director



Abraham May, Jr.
Executive Director

Attachment