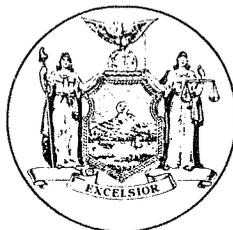


PUBLIC ADMINISTRATOR

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GARY D. GOTLIN  
COMMISSIONER  
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RICHMOND COUNTY

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March 7, 2007

**VIA U.S. MAIL & FAX**

Ernest F. Hart, Esq.  
Chairman  
Equal Employment Practices Commission  
City of New York  
40 Rector Street, 14<sup>th</sup> Floor  
New York, New York 10006

RE: Final Determination Pursuant to the Desk Audit of the Office of the Richmond County Public Administrator (RCPA) and its Compliance with the Equal Employment Practices Commission's Minimum Standards for Equal Employment Opportunity by Non-Mayoral Agencies With Less Than 15 Employees for the Period Starting January 1, 2005 and ending June 30, 2006.

Dear Commissioner Hart:

After reviewing your final determination in your letter dated February 14, 2007, we offer the following response:

**Recommendation #2**

The RCPA should provide appropriate EEO training (such as the 5-day basic training for EEO Professionals by the Department of Citywide Administrative Services or the EEO Studies Program of Cornell University's School of Industrial and Labor Relations) to its EEO Officer, or designate a trained EEO professional from another City agency to administer the EEO Program.

**RCPA Response to Recommendation #2**

We have received notification from the Department of Citywide Administrative Services (DCAS) that a Basic Training for EEO Representatives course has been scheduled for March 15, 22, 29, April 5 and 12, 2007. We are planning to have a representative attend this course.

**Recommendation #1 – EEPC Rationale**

The RCPA's updated EEO Policy Statement does not fully reflect recent changes to the New York City and New York State Human Rights Laws. Specifically, that Policy does not list the following, updated protected classes: Gender (including gender identity); predisposing genetic characteristics (not "generic predisposition or carrier status"); and status as a victim or witness of domestic violence, sexual offenses and stalking.

**RCPA Response to Recommendation #1 – EEPC Rationale**

The RCPA has updated its EEO Policy Statement on March 1, 2007 to include all the protected classes under the New York State and New York City Human Rights Laws in accordance with the Addendum to Equal Employment Opportunity Policy Standards and Procedures to Be Utilized by City Agencies (2005) dated December 14, 2006. A copy of our updated policy is enclosed. This updated policy has been distributed to all RCPA employees, including a copy of the Addendum as referenced above. The RCPA updated policy has been posted in our office.

**Recommendation #3 – EEPC Rationale**

After your EEO Officer receives the five-day training for EEO professionals from the Department of Citywide Administrative Services (DCAS), she should provide EEO refresher training to the RCPA employees based on the EEO training standards established by DCAS.

**RCPA Response to Recommendation #3 – EEPC Rationale**

Upon RCPA participation and completion of the 5-day basic training for EEO Professionals by the Department of Citywide Administrative Services scheduled for March 15, 22, 29, April 5 and April 12<sup>th</sup>, EEO refresher training will be provided to the RCPA employees based on the EEO training standards established by DCAS.

We look forward to a mutually satisfactory compliance process as stated in your letter.

As a point of information regarding your February 14, 2007 letter, the first sentence refers to your letter of January 25, 1997. We assume the correct date is January 25, 2007. We have corrected this on our copy.

Very truly yours,



Gary D. Gotlin  
Public Administrator

GDG:clg  
enclosure

Equal Employment Opportunity.wpd