



Department of Transportation

JANETTE SADIK-KHAN, Commissioner

January 2, 2013

Charise L. Hendricks, PHR  
Interim Executive Director  
Equal Employment Practices Commission  
253 Broadway  
Suite 602  
New York, N.Y. 10007

Re: Resolution #12/30-841 Preliminary Determination Pursuant to the Audit of the Department of Transportation (DOT) and its Compliance with the City's Equal Employment Opportunity Policy from January 1, 2009 through December 31, 2011

Dear Ms. Hendricks:

In reference to your letter dated December 6, 2012, attached is the Department of Transportation's clarification on the Equal Employment Practices Commission's rationale.

Thank you for your consideration of this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Janette Sadik-Khan".

Janette Sadik-Khan  
Commissioner

cc: F/D/C Ardito  
A/C EEO Officer Williams

## SUMMARY OF RECOMMENDED CORRECTIVE ACTIONS

### 1. EEPC Rationale:

In order to better understand the agency's limitations in the recruiting process, the EEPC will require answers to the following questions during the compliance monitoring period: In titles that show underutilization, how does the union structure prevent these groups from receiving the necessary prior experience? What measures has the agency considered to overcome these obstacles?

### **DOT'S Response:**

**Based on feedback from members of the skilled craft titles, there is a feeling that some unions do not provide the same experience and training opportunities for females that are offered to males. It has also been reported that there is some resistance by the unions to females entering these titles. DOT also recognizes that employees in the skilled craft job group must first meet experience requirements in order to enter the title. One possible way to overcome these obstacles is to create more Apprentice, or Helper titles through the Department of Citywide Administrative Services (DCAS), so that trainees can obtain on-the-job training and experience needed to qualify for the skilled craft titles. When business needs dictate, DOT may provide input to DCAS on the creation of such titles, in a citywide effort to address underutilization.**