

EQUAL EMPLOYMENT PRACTICES COMMISSION

SUMMARY COMPLIANCE REPORT

Agency: Conflicts of Interest Board

Agency Head: Mark Davies, Executive Director

EEO Officer: Sung Mo Kim

Audit period: January 1, 2005 – December 31, 2006

Agency Census as of December 31, 2006: 16

Preliminary Determination Letter:

June 19, 2008

Agency Response Letter:

August 8, 2008

Final Determination Letter:

August 22, 2008

Compliance Initiated:

December 2008

Compliance Completed:

November 2009

Covering Months:

December 2008 – May 2009

Date: August 6, 2010

Pursuant to the findings and recommendations of the Equal Employment Practices Commission's (EEOC) Audit of Compliance by the Conflicts of Interest Board (COIB) with the agency's Equal Employment Opportunity Policy from January 1, 2005 through December 31, 2006, the EEOC initiated Audit Compliance with the COIB in December 2008. The COIB requested an extension of the compliance period on July 13, 2009 in order to complete EEO training for the agency's EEO personnel. The Department of Citywide Administrative Services (DCAS) Division of Citywide Equal Employment Opportunity (DCEEO) offered Basic Training for EEO Representatives in November 2009. However, neither EEO Counselor was able to attend. The female EEO Counselor attended and completed the next DCAS Basic Training for EEO Representatives, in June 2010. The EEOC decided not to continue monitoring until the male EEO Counselor receives Basic EEO training because of the small number of COIB staff and because EEO professionals of both genders are available to investigate complaints. The COIB's Final Compliance Report was submitted on August 2, 2010.

All eleven required actions were completed and accepted. The following is a summary of the compliance reports:

1. **The agency's EEO Policy should be revised to include all of the protected classes under the New York City and New York State Human Rights Laws.**

The agency's EEO Policy has been revised to include all of the protected classes under the New York City and New York State Human Rights Laws. A copy of the revised policy was provided with the agency's 4th Monthly Compliance Report.

The required action was completed in April 2009.

- 2. The revised EEO Policy should be distributed to all current and new employees, and posted on the agency bulletin boards.**

The revised EEO Policy has been distributed to all current and new employees, and posted on the agency bulletin boards.

The required action was completed in April 2009.

- 3. The COIB should ensure that EEO policies and procedures are available in alternate formats for persons with disabilities (i.e. large print, audio tape and/or Braille). (Sect. VC, Citywide EEO Policy)**

The COIB made its EEO Policy available in large print format for persons with disabilities.

The required action was completed in April 2009.

- 4. The COIB should formally appoint a disabilities rights coordinator and employees should be notified in writing of that appointment. (Sect. VB, Citywide EEO Policy)**

The agency's EEO Officer has been formally appointed disabilities rights coordinator.

The required action was completed in March 2009.

- 5. Since knowledgeable EEO professionals are essential to the success of the EEO program, and to ensure that EEO professionals have a uniform body of knowledge, both EEO counselors should attend the next available DCAS training session for EEO professionals or enroll in training conducted by another appropriate agency or school, such as the EEO Studies Program of Cornell University's School of Industrial and Labor Relations. The EEO counselors should obtain the certificate or otherwise complete the program at the institution selected by the COIB. (Sect. VB, Citywide EEO Policy)**

The female EEO Counselor attended and completed the DCAS Basic EEO Training for EEO Professionals in June 2010. A certificate of completion was provided with the agency's final report. Because of the small number of COIB staff, EEPC will not continue monitoring until the male EEO Counselor receives Basic EEO training.

The required action was completed in June 2010.

6. **The EEO officer should meet with the EEO counselors at least at quarterly intervals to ensure that they are carrying out their EEO functions satisfactorily and are kept abreast of internal and external EEO developments. (Citywide EEO Policy, sect VC)**

The EEO Officer met with the agency's EEO counselors and has established a quarterly meeting with the counselors to ensure that EEO staff is carrying out their EEO functions satisfactorily and are abreast of internal and external EEO developments. A copy of the meeting agenda was provided.

The required action was accepted in April 2009.

7. **In addition to sexual harassment EEO training, the COIB should develop a plan, which includes a timetable for providing non-sexual harassment EEO training. (Sect. IV, Citywide EEO Policy)**

The agency provided EEO training to all employees on April 27, 2009 and May 1, 2009. A copy of the attendance sheet was provided.

The required action was accepted in May 2009.

8. **The COIB should ensure that all employees involved in job interviewing receive structured interview training, either from DCAS or another appropriate organization. (Sect. IV, Citywide EEO Policy)**

Staff conducted structured interview training on June 5, 2009 for employees involved in job interviewing using training documents produced by the DCAS. A copy of the attendance sheet was provided.

The required action was completed in June 2009.

9. **To ensure fair employment practices, the agency head should direct the human resources department to include the EEO officer in the development of recruitment strategies and the selection of recruitment media. (Sect. IV, EEOP)**

The agency's administrative department has been directed to include the EEO officer in the development of recruitment strategies and the selection of recruitment media.

The required action was accepted in March 2009.

10. **It is the Commission's position that appropriate documentation of meetings and other communications between the EEO Officer and the agency head regarding EEO program operational decisions be maintained.**

Documentation of meetings and other communications between the EEO Officer and the agency head regarding EEO program operational decisions are being maintained. A copy of a meeting agenda was provided.

The required action was completed in April 2009.

11. **The agency head should distribute an agency-wide memo informing staff of the changes that are being implemented in the agency's EEO program pursuant to the audit and re-emphasize his commitment to the agency's EEO program.**

The COIB's Executive Director distributed an agency-wide memo informing staff of the changes that are being implemented in the agency's EEO program pursuant to the audit and re-emphasize his commitment to the agency's EEO program. (Copy Attached).

The required action was completed in June 2009.

Recommendation

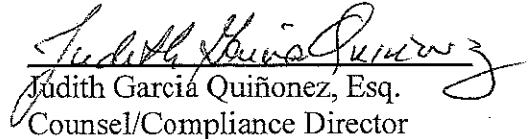
Based on the above information, we recommend that the Equal Employment Practices Commission issue a Letter of Completion of Compliance to Executive Director Mark Davies informing him that the Conflicts of Interest Board has implemented all of the recommended corrective actions to the Commission's satisfaction.

Respectfully Submitted,



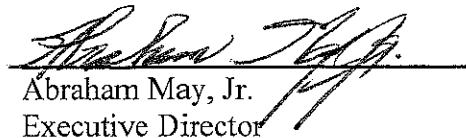
Adrienne Smith

EEO Auditor/Compliance Officer



Judith Garcia Quiñonez, Esq.

Counsel/Compliance Director



Abraham May, Jr.

Executive Director

Attachment