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By Mail and Email

May 11, 2016

Lois A. Rosenblatt
Public Administrator
Queens County Public Administrator's Office
88-11 Sutphin Boulevard, Suite 61
Jamaica NY 11435

Re: Preliminary Determination: Audit, Evaluation and Monitoring of the Office of the Queens County Public Administrator's Employment Practices and Procedures from July 1, 2012 to December 31, 2015.

Dear Public Administrator Rosenblatt:

On behalf of the members of the Equal Employment Practices Commission (Commission or EEPCC), thank you and your agency for the cooperation extended to our staff during the course of this audit. This letter contains the Commission's findings and preliminary determinations pursuant to our audit and analysis of your agency's Employment Practices and Procedures for the period covering July 1, 2012 to December 31, 2015.

The New York City Charter, Chapter 36, Section 831(d)(5), empowers this Commission to audit and evaluate city agencies' employment practices, programs, policies and procedures, and their efforts to ensure fair and effective equal employment opportunity for employees and applicants seeking employment with city agencies. Section 832.c provides that this Commission may, pursuant to an audit, make a preliminary determination that any plan, program or procedure utilized by any city agency does not provide equal employment opportunity and recommend all necessary and appropriate procedures, approaches, measures, standards and programs to be utilized by agencies in these efforts.

The Office of the Queens County Public Administrator, which may herein be referred to as "the agency," falls within the Commission's purview under Chapter 36, Section 831(a) of the New York City Charter, which delineates city agency as any "city, county, borough or other office, administration, board, department, division, commission, bureau, corporation, authority, or other agency of government where the majority of the board members of such agency are appointed by the mayor or serve by virtue of being city officers or the expenses of which are paid in whole or in part from the city treasury..."



The purpose of this audit and analysis is to evaluate the agency's Employment Practices and Procedures, not to issue findings of discrimination pursuant to the New York City Human Rights Law. This Commission has adopted *Uniform Standards for EEPC Audits*¹ and *Minimum Equal Employment Opportunity Standards for Community Boards* to assess agencies' EEO programs and policies for compliance with federal, state and local laws, regulations, policies and procedures which are designed to increase equality of opportunity for municipal government employees and job applicants. These standards are founded upon and consistent with federal, state and local laws, regulations, procedures and policies including, but not limited to, the Citywide Equal Employment Opportunity Policy - Standards and Procedures to be Utilized by City Agencies; the New York City Human Rights Law (NYC Administrative Code §§8-107(1)(a) and (d), 8-107.13, and 8-107.1); the New York State Civil Service Law §55-a; the Uniform Guidelines on Employee Selection Procedures (29 CFR §§1607.3 - 1607.7); the Americans with Disabilities Act; and its Accessibility Guidelines, and the equal employment opportunity requirements of the New York City Charter. Prescribed corrective actions are consistent with the aforementioned parameters.

Since this Commission is empowered to review and recommend actions which each agency should consider including in its annual plan of measures and programs to provide equal employment opportunity (Annual EEO Plan), the audited agency should incorporate required corrective actions in its current EEO Program and prospective Annual EEO Plans.

Scope and Methodology

This Commission's audit methodology includes collection and analysis of the documents, records and data the agency provides in response to the *EEPC Document and Information Request Form*; responses to the *EEPC Interview Questionnaires* for EEO professionals and others involved in EEO program administration; and, if applicable, review of the agency's *Annual EEO Plans* and *Quarterly EEO Reports* and analysis of workforce and utilization data from the *Citywide Equal Employment Database System* (CEEDS).

This Commission reviews the workforce statistics and utilization analysis information available via CEEDS to understand the concentrations of race and gender groups within an agency's workforce. (CEEDS may be unavailable for certain non-mayoral agencies. In such cases, the EEPC requests that the agency submit similar statistics and analysis.) EEO Program Analysts examine imbalances between the number of employees in a particular job category and the number that would reasonably be expected when compared to their availability in the relevant labor market. Personnel transactions are reviewed in order to ascertain the agency's employment practices. Where underutilization is revealed within an agency's workforce, EEO Program Analysts assess whether the agency has undertaken reasonable measures to address it.

EEO professionals (including, but not limited to, past or current EEO Officers, Deputy or Co-EEO Officers, EEO Counselors, EEO Trainers, EEO Investigators, Disability Rights Coordinators, Career Counselors, 55-a Program Coordinators) and others involved in EEO program administration such as the Principal Human Resources Professional are given a two-week deadline to complete and

¹ Corresponding audit/analysis standards are numbered throughout the document.



return their individual questionnaires. The Commission's EEO Program Analysts also conduct additional research and follow-up discussions or interviews with EEO professionals, when appropriate.

To encourage response, the EEPC requests that the head or deputy of each agency send emails to employees and to supervisors/managers that provide links to our questionnaires.

Description of the Agency

The Public Administrator administers estates of deceased persons. There is a Public Administrator in every county in the City of New York. The Public Administrator's primary duty is to administer estates that would otherwise remain unadministered; to protect the decedent's property from waste, loss, or theft; to make appropriate burial arrangements when no close relative is available to make the decisions; to conduct thorough investigations to discover all assets; to liquidate assets at public sale or distribute assets to heirs; to pay the decedent's bills and taxes; and to locate persons entitled to inherit from the estate and ensure that the legal distributees receive their inheritance.

The Public Administrator of Queens County currently has 15 employees. (See workforce composition attached as Appendix -1)

PRELIMINARY DETERMINATIONS AFTER AUDIT AND ANALYSIS

Following are the corresponding audit standards for each subject area along with the EEPC's findings and required corrective actions, where appropriate:

I. ISSUANCE, DISTRIBUTION AND POSTING OF EEO POLICIES:

Determination: The agency is compliance with the standards for this subject area.

1. Issue a general EEO Policy statement or memo reiterating commitment to EEO, declaring the agency's position against discrimination on any protected basis, advising employees of the names and contact information of EEO professionals, and attaching, or providing employees pertinent electronic links to, an EEO Policy/Handbook.
- ✓ The agency issued an EEO Policy Statement in November, 2011. The general EEO Policy statement reiterated the Public Administrator's commitment to EEO, declared its position against discrimination on any protected basis, advised employees of the names and contact information of EEO professionals, and provided employees with pertinent electronic links to, an EEO Policy/Handbook.
2. Distribute/Post a paper or electronic copy of the *Equal Employment Opportunity Policy, Standards and Procedures to Be Utilized by City Agencies* – or an agency EEO Policy that

conforms to city, state and federal laws – for use by managers, supervisors, and legal, human resources and EEO professionals. Include, or attach as addenda: a policy against sexual harassment; uniform and responsive procedures for investigating discrimination complaints and providing reasonable accommodations; an up-to-date list of protected classes under NYC and NYS Human Rights Laws; and current contact information for the agency’s EEO professionals, as well as federal, state and local agencies that enforce laws against discrimination.

- ✓ The agency reported that, during the period in review, it had posted in the employee break room the following Equal Employment Opportunity documents: the agency’s EEO Policy Statement, *Equal Employment Opportunity is the Law*, *The New York State Division of Human Rights Executive Law, Article 15, Employee Rights and Responsibilities Under the Family and Medical Leave Act*, *Your Rights Under USERRA (The Uniformed Services Employment and Reemployment Act)*, and a policy concerning *Work Experience Program (“WEP”) Participants*. The agency also reported that, upon being hired, employees received The New Hire Document Package, which included: The current City EEO Policy (*Equal Employment Opportunity Policy, Standards and Procedures to Be Utilized by City Agencies*), the Department of Citywide Administration Services (DCAS) handbook *About EEO: What You May Not Know*, the DCAS *Reasonable Accommodation Procedural Guidelines City of New York*, *Operational Policies and Procedures for the Office of the Public Administrator of Queens*, *Practical Procedures for the Public Administrator of Queens*, and *55-a Policy*. On March 16, 2015 the agency provided the new employee with the New Hire Document Package; the employee signed the *Receipt for EEO Informative Packet* as confirmation.

II. EEO TRAINING FOR AGENCY:

Determination: The agency is in compliance with the standards for this subject area.

3. Establish and implement an EEO training plan for new and existing employees to ensure that all individuals who work within the agency, including managers and supervisors, receive training on unlawful discriminatory practices under local, state and federal EEO laws; EEO rights and/or responsibilities; discrimination complaint and investigation procedures; prevention of sexual harassment; and reasonable accommodation procedures.
- ✓ The agency demonstrated that fourteen (14) employees (including two (2) managers and twelve (12) “line employees”) completed the Department of Citywide Administration Services (DCAS) *Computer-Based Training (CBT)* between December 17, 2015 and December 30, 2015. Subsequent to the period in review, on January 4, 2016, the newly hired employee completed the aforementioned DCAS *EEO Computer Based Training*. The Computer Based Training included the following topics: *Understanding EEO; Legally Protected Characteristics; Sexual Harassment; Reasonable Accommodations; How to File a Complaint and the City's Commitment*. Additionally, the agency reported that, “as part of our new employee orientation packet, we provide [the] current City EEO policy; require that [employees] take the [DCAS] CBT course (for civil service employees) or provide copies of the EEO training modules and course quizzes.”

III. EMPLOYMENT PRACTICES (Recruitment, Hiring & Promotion):

Determination: The agency is in partial compliance with the standards for this subject area.

4. The principal EEO Professional, HR Professional, and General Counsel, review the agency's statistical information (i.e. workforce, hires, promotions, and separations by race/ethnicity and gender), the annual number of EEO complaints, and the agency's employment practices, policies and programs on an annual basis to identify whether there are barriers to equal opportunity within the agency and determine what, if any, corrective actions are required to correct deficiencies.
- ✓ During the period in review, the Deputy Public Administrator functioned as both the principal EEO Professional and the principal HR Professional; the agency does not employ a General Counsel. Additionally, the agency reported that it did not conduct a review of the agency's annual number of EEO complaints because no employment discrimination complaints were filed.
 - The agency did not demonstrate that, during the period in review, the Deputy Public Administrator (principal EEO/HR Professional) reviewed the agency's statistical information (i.e. workforce, hires, promotions, and separations by race/ethnicity and gender), employment practices, policies and programs on an annual basis to identify whether there are barriers to equal opportunity within the agency and determine what, if any, corrective actions are required in order to correct deficiencies. **Corrective action is required.**

Corrective Action #1: Ensure that the principal EEO/HR Professional reviews the agency's statistical information (i.e. workforce, hires, promotions, and separations by race/ethnicity and gender), employment practices, policies and programs on an annual basis to identify whether there are barriers to equal opportunity within the agency and determine what, if any, corrective actions are required in order to correct deficiencies (e.g. underutilization or adverse impact). If necessary, consult with the Law Department, Division of Citywide Diversity and EEO, or another resource for guidance.

5. Ensure that human resources professionals, managers, supervisors, and other personnel involved in recruiting and hiring are trained to consider EEO laws/policies and use uniform, job-related techniques to identify, interview and select the most capable candidates (e.g. structured interview training or guide).
- ✓ The agency reported that the Public Administrator and the Deputy Public Administrator were the only personnel involved in recruitment and hiring. The agency demonstrated that in September, 2008 the Deputy Public Administrator attended the Department of Citywide Administrations Services "*Basic Training for EEO Representatives*", and was trained to consider EEO laws/policies and use uniform, job-related techniques to identify, interview and select the most capable candidates. Additionally, on March 3, 2015, the agency used a structured interview guide when conducting interviews to fill the secretary position.

6. Promote employees' awareness of opportunities for promotion and transfer within the agency, and ensure that employees are considered for such opportunities.
 - ✓ The agency reported that there were no opportunities for promotion or transfer during the period in review; therefore, no further analysis was done in this area.
7. At minimum, indicate the agency is an equal opportunity employer in recruitment literature.
 - ✓ The agency reported that it had one job vacancy that was filled through the civil service list. No job vacancy notices were posted.
8. Use and maintain an applicant/candidate log or tracking system which, at minimum, includes the *position, applicants'/candidates' names, identification number, ethnicity, gender, disability or veteran status, interview date, interviewers' names, result, reason selected/not selected (or disposition) of each applicant, and recruitment source*. Ensure that the process avoids the appearance of bias by delegating the responsibility for recording and maintaining this information to an individual other than the hiring manager.
 - ✓ During the period in review, the agency conducted interviews for one (1) position: *Secretary/Receptionist*; applicants were selected exclusively from the "Secretary" civil service list (see III.7). The agency maintained an applicant log which captured the following information: *Position, Applicants Name, Last four (4) digits of the Social Security Number, Gender, Disability, Veteran, Interview Date, Time, Selected, Comment and List Number*.
 - The applicant log did not capture the ethnicity of the candidate, or interviewers' names. The agency also did not demonstrate that someone other than the hiring manager was responsible for recording and maintaining this information. **Corrective action required.**

Corrective Action #2: Use and maintain an applicant/candidate log or tracking system which, in addition to the aforementioned fields, also captures the ethnicity of the candidate and interviewers' names. Ensure that the process avoids the appearance of bias by delegating the responsibility for recording and maintaining this information to an individual other than the hiring manager.

IV. CAREER COUNSELING:

Determination: The agency is in **partial compliance** with the standards for this subject area.

9. Designate a professional (may be referred to as the Career Counselor) with appropriate training, knowledge and familiarity with career opportunities in City government to provide career counseling to employees upon request. Remind employees of the identity/type of guidance available from the Career Counselor at least once each year.
 - ✓ The agency reported that the Deputy Director notified employees of training opportunities.

- During the period in review, the agency did not designate a professional with appropriate training, knowledge and familiarity with career opportunities in City government to provide career counseling to employees upon request. **Corrective action required.**

Corrective Action #3: Designate a professional with appropriate training, knowledge and familiarity with career opportunities in City government to provide career counseling to employees upon request. Remind employees of the identity/type of guidance available from the Career Counselor at least once each year.

10. The Human Resources Professional distributes the identity of the agency Career Counselor and ensures that all employees have access to information regarding job responsibilities, performance evaluation standards, examinations, training opportunities and job postings; ensures that all new employees are advised of the EEO policies, their rights and responsibilities under such policies and the discrimination complaint procedures; informs the principal EEO Professional of the number of 55-a program participants and efforts the agency has made to employ, promote or accommodate qualified individuals with disabilities; involves the principal EEO Professional in EEO-related matters; and promptly consults with the principal EEO Professional if informed of, or suspects that a violation of the EEO Policy has occurred.

- ✓ During the period in review, the Deputy Public Administrator (the agency's principal EEO/HR Professional) was responsible for HR related matters. The agency reported that the Deputy Public Administrator ensured that new employees were advised of the EEO policies, their rights and responsibilities under such policies, and the discrimination complaint procedures; new employees also received the "New Hire Document Package" (see §I.2), which included information regarding job responsibilities for each employment position. On December 17, 2015, the Deputy Public Administrator instructed staff to participate in the Department of Citywide Administrative Services *Computer Based Training*; and, encouraged employees to qualify as a Notary Public by taking the examination. The agency also reported that there were no 55-a program participants, no requests for reasonable accommodation (§V.11), no opportunities for promotion (§III.6), and no job postings during the period in review.

- The agency did not demonstrate that all employees had access to information regarding performance evaluation standards. **Corrective action required.**

Corrective Action #4: Ensure that employees have access to information regarding performance evaluation standards.

**V. EEO AND REASONABLE ACCOMMODATIONS FOR EMPLOYEES/
APPLICANTS FOR EMPLOYMENT WITH DISABILITIES:**

Determination: The agency is in compliance with the standards for this subject area.

11. Ensure that information regarding employee rights and obligations, and the complaint, investigation and reasonable accommodation procedures is made available in appropriate

alternative formats (i.e., large print, audio tape and/or Braille) upon request to employees and applicants for employment with disabilities.

- ✓ The agency reported that, during the period in review, information regarding employee rights and obligations, and the complaint, investigation and reasonable accommodation procedures were available in large print. The agency also indicated its commitment to providing the aforementioned documents, in all appropriate alternative formats (i.e., large print, audio tape and/or Braille), upon request, to employees and applicants for employment with disabilities.

12. Document reasonable accommodation requests and their outcomes.

- ✓ The agency reported that reasonable accommodation requests are documented via the agency's *Reasonable Accommodations Request Form* and are "usually [submitted] via email and are immediately reviewed and implemented". During the period in review, no reasonable accommodations were received.

VI. RESPONSIBILITY FOR EEO PLAN IMPLEMENTATION - EEO PROFESSIONALS:

Determination: The agency is in partial compliance with the standards for this subject area.

13. Appoint a principal EEO Professional to implement EEO policies and standards within the agency. The principal EEO Professional is trained and knowledgeable regarding city, federal and state EEO laws; the requirements of the agency's EEO policies, standards and procedures; and the prevention, investigation, and resolution of discrimination complaints.

- ✓ The Deputy Public Administrator was appointed as the agency's principal EEO Professional, to implement EEO policies and standards within the agency. The Deputy Public Administrator completed the Department of Citywide Administrations Services "*Basic Training for EEO Representatives*" on September 23, 2008.

14. Ensure that EEO professionals are trained in EEO laws and procedures and know how to carry out their responsibilities under the EEO Policy.

NOTE: The Deputy Public Administrator is the agency's sole EEO Professional.

15. The principal EEO Professional reports directly to the agency head (or an approved direct report other than the General Counsel) in order to exercise the necessary authority and independent judgment to fulfill EEO responsibilities.

- ✓ The Deputy Public Administrator (agency's principal EEO Professional) reports directly to the agency head in order to exercise the necessary authority and independent judgment to fulfill EEO responsibilities. This reporting relationship was reflected in the agency's organizational chart.

16. To ensure the integrity and continuity of the EEO Program, maintain appropriate documentation of meetings and other communications between the agency head (or a direct report other than the General Counsel) and the principal EEO Professional regarding decisions that impact the administration and operation of the EEO program.

- The agency reported that, during the period in review, there were no meetings or communications between the agency head and the principal EEO Professional regarding decisions that impact the administration and operation of the EEO program. **Corrective action required.**

Corrective Action #5: Maintain appropriate documentation of meetings and other communications between the agency head (or a direct report other than the General Counsel) and the principal EEO Professional regarding decisions that impact the administration and operation of the EEO program.

VII. RESPONSIBILITY FOR EEO PLAN IMPLEMENTATION – SUPERVISORS/MANAGERS:
Determination: The agency is not in compliance with the standards for this subject area.

17. Establish and administer an annual managerial/non-managerial performance evaluation program to be used for probationary periods, promotions, assignments, incentives and training.

- ✓ The agency reported that it had two (2) managerial employees, the Public Administrator, and the Deputy Public Administrator.
 - The agency did not establish or conduct annual managerial and non-managerial performance evaluation programs. **Corrective action is required.**

Corrective Action #6: Establish and implement an annual managerial/non-managerial performance evaluation program (with timetable) to be used for probationary periods, promotions, assignments, incentives and training.

18. The managerial performance evaluation form contains a rating for EEO (which covers responsibilities and processes for assuring their ability to make employment decisions based on merit and equal consideration, or treat others in an equitable and impartial manner).

- The agency did not rate managers on implementing EEO related responsibilities. **Corrective action is required.**

Corrective Action #7: Ensure that the managerial performance evaluation form contains a rating for EEO (which covers responsibilities and processes for assuring their ability to make employment decisions based on merit and equal consideration, or treat others in an equitable and impartial manner).



VIII. REPORTING STANDARD FOR AGENCY HEAD:

Determination: The agency is not in compliance with the standards for this subject area.

19. Submit to the EEPC an Annual Plan of measures and programs to provide equal employment opportunity, and quarterly reports² (up to 30 days following each quarter) on efforts to implement the plan.

- During the period in review the agency did not submit an Annual Plan of measures and programs to provide equal employment opportunity or quarterly reports on efforts to implement the plan. **Corrective action is required.**

Corrective Action #8: Submit to the EEPC an Annual Plan of measures and programs to provide equal employment opportunity, and quarterly reports² (up to 30 days following each quarter) on efforts to implement the plan.

After implementation of the EEPC's corrective actions, if any:

20. The agency head distributes a memorandum informing employees of the changes implemented in the EEO program pursuant to the EEPC's audit/analysis and re-emphasizing the agency head's commitment to the EEO program.

Final Action: Distribute a memorandum signed by the agency head informing employees of the changes implemented in the EEO program pursuant to the EEPC's audit/analysis and re-emphasizing the agency head's commitment to the EEO program.

Conclusion

The agency has 8 required corrective action(s) at this time.

Pursuant to Chapter 36 of the New York City Charter, your agency has the *option* to respond to this *preliminary determination*, but must respond to our Final Determination if corrective action is required.

Optional Response to preliminary determination: If submitted, your optional response should indicate, with attached documentation, what steps your agency has taken or will take to implement the prescribed corrective actions, and must be received in our office within 14 days from the date of this letter. No extensions will be granted for the *option* to respond to the *preliminary determination*.

² Submission of Quarterly Reports on EEO Activity is optional for non-Mayoral agencies.



(Optional Conference) During the Optional Conference, we will discuss the immediate steps your agency should take and address questions regarding your agency's implementation of the prescribed corrective action(s).

(No Response Option) If your agency does not respond to this preliminary determination within 14 days, it will become the EEPC's Final Determination.

Mandatory Response to Final Determination: Following this preliminary determination, the EEPC will issue a Final Determination where we may modify or eliminate the corrective actions based on verified information; identify remaining action which requires further monitoring in order to ensure implementation; and assign a mandatory compliance-monitoring period of up to 6 months for this purpose. Pursuant to Chapter 36 of the New York City Charter your agency must respond to our Final Determination within 30 days. Your response to the Final Determination will initiate the compliance monitoring period.

In closing, we want to thank you and your staff for the cooperation extended to the Equal Employment Practices Commission's EEO Program Analysts during the course of our audit and analysis.

Respectfully Submitted by,

A handwritten signature in black ink, appearing to read "Nathan P. Conway".

Nathan P. Conway, EEO Program Analyst

Approved by,

A handwritten signature in blue ink, appearing to read "Charise L. Terry".

Charise L. Terry, PHR
Executive Director

c: Susan Brown, Principal EEO Professional

Appendix - 1

Office of the Queens County Public Administrator

Statistical Profile of Agency Workforce
(End of audit period)

Attachment 13: Statistical Profile of Agency Workforce
Beginning and End of Audit Period

Agency: 944

# Employees	Beginning of Audit Period <u>07/01/2012</u>	End of Audit Period <u>12/31/2015</u>
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Male	4	4
Female	10	11

White	10	11
Black	2	2
Hispanic	2	2
Asian		
Native American		
Unknown		

Total # of Employees	14	15
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Queens County Office of the Public Administrator

Lois M. Rosenblatt, Esq.
Public Administrator

Susan B. Brown
Deputy Public Administrator

Gerard J. Sweeney, Esq.
Counsel
May 19, 2016

NYC
Equal Employment Practices Commission
253 Broadway, Suite 602
New York, NY 10007

Attention: Mr. Nathan P. Conway
EEO Program Analyst

Dear Mr. Conway:

This is in response to your Preliminary Determination of this offices' EEO practices dated May 11, 2016.

Corrective Action #1:

We have consulted with Jocelyn Tan Lobo, Executive Director of Compliance with DCAS, for her guidance on the appropriate method for recording and reviewing statistical data. Upon receipt of her response, this agency will ensure that the Deputy Public Administrator/EEO Professional shall review all data on an annual basis.

Corrective Action #2:

The applicant/candidate log previously used in hiring the Secretary in March 2015 has been updated to include ethnicity. The responsibility of recording the data on this log will be delegated to the now hired Secretary. The new form is attached hereto. Additionally, we will provide all new applicants/candidates with a Voluntary Self-Identification Form for race and ethnicity. This form is also attached hereto.

Corrective Action #3:

This agency lacks the budgetary means to hire a Career Counselor. However, we shall advise and remind all employees to visit www.nyc.gov/jobs and forward all relevant job postings received by other NYC agencies.

Mr. Nathan P. Conway
May 18, 2016
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Corrective Action #4:

On August 4, 2014, an informal staff meeting was conducted by the undersigned. All employees were present and various topics were discussed including what was expected of each employee. A copy of the meeting's topics is attached hereto. (I believe this information was not conveyed during your conversation. The Deputy has recently uncovered this document during her research for this response.)

Corrective Action #5:

Monthly meetings between the EEO Professional and the undersigned shall be conducted to discuss various EEO issues. Each meeting will be documented via email confirmation.

Corrective Action #6:

As advised during your telephone conference with the EEO Professional, this agency had not conducted employee performance evaluations. We will develop a comprehensive employee evaluation plan.

Corrective Action #7:

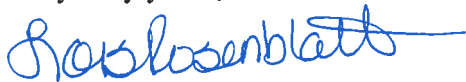
Contrary to your statement on page 9, Section VII, this Agency does not have managerial employees. The Public Administrator and Deputy Public Administrator are statutory appointees who serve at the pleasure of the Surrogate.

Corrective Action #8:

The Public Administrator has adopted the Standards and Procedures of the New York City EEO Policy, revised in 2014. <http://www1.nyc.gov/assets/dhs/downloads/pdf/eoo.pdf>

In compliance with your final action, attached you will find my memorandum to my staff.

Very truly yours,



LOIS ROSENBLATT
PUBLIC ADMINISTRATOR
LMR/encls. 4

cc: Susan B. Brown, Principal EEO Professional



Angela Cabrera
Malini Cadambi Daniel
Elaine S. Reiss, Esq.
Arva R. Rice
Commissioners

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BY MAIL AND EMAIL

June 6, 2016

Lois A. Rosenblatt
Public Administrator
Queens County Public Administrator's Office
88-11 Sutphin Boulevard, Suite 61
Jamaica NY 11435

RE: Audit Resolution **2016/944**: Final Determination Pursuant to the Review, Evaluation and Monitoring of the Office of the Queens County Public Administrator's Employment Practices and Procedures from July 1, 2012 to December 31, 2015.

Dear Public Administrator Rosenblatt:

On behalf of the members of the Equal Employment Practices Commission (Commission or EEPC), thank you for your May 19, 2016 response to our May 11, 2016 Preliminary Determination and for the cooperation extended to our staff during the course of this audit.

As indicated in our Preliminary Determination, this Commission has adopted uniform standards¹ to assess agencies' employment practices and programs for compliance with federal, state and local laws, regulations, policies and procedures which are designed to increase equality of opportunity for municipal government employees and job applicants. The attached Determination contains the Commission's findings and required corrective actions pertaining to the referenced review, evaluation and monitoring of your agency's employment practices and procedures.

Chapter 36, Section 832.c of the New York City Charter requires that: 1) the EEPC assign a 6-month compliance period to monitor your agency's efforts to eliminate remaining required corrective actions; and 2) the agency provide a written response within 30 days from the date of this letter indicating corrective action taken. The assigned compliance-monitoring period is: July 2016 to December 2016.

¹ Founded upon and consistent with federal, state and local laws, regulations, procedures and policies including, but not limited to, the Citywide Equal Employment Opportunity Policy - Standards and Procedures to be Utilized by City Agencies; New York City Human Rights Law (NYC Administrative Code, §§8-107.1(a) and 8-107.13(d)); New York State Civil Service Law §55-a; Uniform Guidelines on Employee Selection Procedures (29 CFR §§1607.3 - 1607.7) and the equal employment opportunity requirements of the New York City Charter.



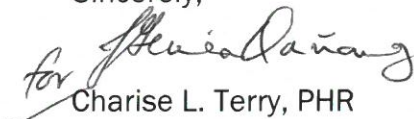
If corrective actions remain: Your agency's response should indicate what steps your agency has taken, or will take, to implement the corrective actions during the designated period. Documentation which supports the implementation of each corrective action shall be uploaded to TeamCentral, the EEPCC's Automated Compliance-Monitoring System. Your agency will be monitored monthly until all corrective actions have been implemented. Instruction on how to access and navigate TeamCentral is attached. Upon your agency's completion of the final corrective action, this Commission requires that your agency upload a final memorandum signed by the agency head which informs employees of the changes implemented pursuant to our audit and re-emphasizes commitment to the EEO program. Upon receipt of the final memorandum, the EEPCC will issue a Determination of Compliance.

If no corrective actions remain: Your agency is exempt from the aforementioned monitoring period. However, this Commission requires a final memorandum signed by the agency head which informs employees of the changes implemented pursuant to our audit and re-emphasizes commitment to the EEO program. This will be considered your agency's final action. Upon receipt of the memo, a *Determination of Compliance* will be issued.

If there are further questions regarding this Final Determination or the compliance-monitoring process, please have the Principal EEO Professional call Marie Giraud, Esq., Agency Attorney/Director of Compliance Monitoring at 212-615-8942.

Thank you and your staff for your continued cooperation.

Sincerely,


for
Charise L. Terry, PHR
Executive Director

c: Susan Brown, Principal EEO Professional

FINAL DETERMINATION

Agency response indicating corrective action taken with documentation is due within 30 days.

The Equal Employment Practices Commission's findings and required corrective actions are based on the audit methodology which includes collection and analysis of the documents, records and data the agency provided in response to the *EEPC Document and Information Request Form*; the *EEPC Interview Questionnaires* for EEO professionals and others involved in EEO program administration; and, if applicable, the *EEPC Employee Survey*, the *EEPC Supervisor/Manager Survey*, the agency's *Annual EEO Plans* and *Quarterly EEO Reports*; and workforce and utilization data from the *Citywide Equal Employment Database System*. Additional research and follow-up discussions or interviews were conducted as appropriate.

After reviewing the agency's optional response (if applicable) to the EEPC's preliminary Determination, our Final Determination is as follows:

Monitoring Required

The agency's implementation of the following required corrective actions will be monitored during the assigned compliance monitoring period.

Corrective Action #1

Ensure that the principal EEO/HR Professional reviews the agency's statistical information (i.e. workforce, hires, promotions, and separations by race/ethnicity and gender), employment practices, policies and programs on an annual basis to identify whether there are barriers to equal opportunity within the agency and determine what, if any, corrective actions are required in order to correct deficiencies (e.g. underutilization or adverse impact). If necessary, consult with the Law Department, Division of Citywide Diversity and EEO, or another resource for guidance.

Agency Response: "We have consulted with ... [the] Executive Director of Compliance with DCAS, for her guidance on the appropriate method for recording and reviewing statistical data. Upon receipt of her response, this agency will ensure that the Deputy Public Administrator/EEO Professional shall review all data on an annual basis." (Response pg. 1.)

EEPC Response: The EEPC recognizes the agency's effort to implement corrective action #1. Documentation which verifies implementation will be reviewed during the compliance-monitoring period.

Corrective Action #2

Use and maintain an applicant/candidate log or tracking system which, addition to the aforementioned fields, also captures the ethnicity of the candidate and interviewers' names. Ensure that the process avoids the appearance of bias by delegating the responsibility for recording and maintaining this information to an individual other than the hiring manager.

Agency Response: "The applicant/candidate log previously used in hiring the Secretary in March 2015 has been updated to include ethnicity. The responsibility of recording the data on this log will be delegated to the now hired Secretary. The new form is attached hereto. Additionally, we will provide all



new applicants/candidates with a Voluntary Self-Identification Form for race and ethnicity. This form is also attached hereto." (Response pg. 1.)

EEPC Response: The EEPC recognizes the agency's efforts to implement corrective action #2. Documentation which verifies use of the applicant/candidate log will be required during the compliance-monitoring period.

Corrective Action #3

Designate a professional with appropriate training, knowledge and familiarity with career opportunities in City government to provide career counseling to employees upon request. Remind employees of the identity/type of guidance available from the Career Counselor at least once each year.

Agency Response: *"This agency lacks the budgetary means to hire a Career Counselor. However, we shall advise and remind all employees to visit www.nyc.gov/jobs and forward all relevant job postings received by other NYC agencies." (Response pg. 1.)*

EEPC Response: The EEPC recognizes the agency's efforts to implement corrective action #3. Documentation which verifies implementation will be reviewed during the compliance-monitoring period.

Corrective Action #4

Ensure that employees have access to information regarding performance evaluation standards.

Agency Response: *"On August 4, 2014, an informal staff meeting was conducted by the undersigned. All employees were present and various topics were discussed including what was expected of each employee. A copy of the meeting's topics is attached hereto. (I believe this information was not conveyed during your conversation. The Deputy has recently uncovered this document during her research for this response." (Response pg. 2.)*

EEPC Response: The EEPC recognizes the agency's efforts to implement corrective action #4. The EEPC will provide further guidance at the initiation of the compliance-monitoring period.

Corrective Action #5

Maintain appropriate documentation of meetings and other communications between the agency head (or a direct report other than the General Counsel) and the principal EEO Professional regarding decisions that impact the administration and operation of the EEO program.

Agency Response: *"Monthly meetings between the EEO Professional and the undersigned shall be conducted to discuss various EEO issues. Each meeting will be documented via email confirmation." (Response pg. 2.)*



EEPC Response: The EEPC recognizes the agency's commitment to implement corrective action #5. Documentation that verifies implementation will be required during the compliance-monitoring period."

Corrective Action #6

Establish and implement an annual managerial/non-managerial performance evaluation program (with timetable) to be used for probationary periods, promotions, assignments, incentives and training.

Agency Response: *"This agency had not conducted employee performance evaluations. We will develop a comprehensive employee evaluation plan". (Response pg. 2.)*

EEPC Response: The EEPC recognizes the agency's commitment to implement corrective action #6. Documentation which verifies the implementation of an evaluation program for all employees will be required during the compliance-monitoring period.

Corrective Action #7

Ensure that the managerial performance evaluation form contains a rating for EEO (which covers responsibilities and processes for assuring their ability to make employment decisions based on merit and equal consideration, or treat others in an equitable and impartial manner).

Agency Response: *"This Agency does not have managerial employees. The Public Administrator and Deputy Public Administrator are statutory appointees who serve at the pleasure of the Surrogate." (Response pg. 2.)*

EEPC Response: The EEPC will accept documentation that verifies the agency's assertion. The EEPC will provide further guidance at the initiation of the compliance-monitoring period.

Corrective Action #8

Submit to the EEPC an Annual Plan of measures and programs to provide equal employment opportunity, and quarterly reports (up to 30 days following each quarter) on efforts to implement the plan.

Agency Response: *Given the size of our agency (five employees, including the Public Administrator and Deputy Public Administrator), we need to clarify what is expected in an Annual Plan or quarterly report." (Response pg. 3.)*

EEPC Response: The EEPC will provide further guidance at the initiation of the compliance-monitoring period.

Thank you and your staff for your continued cooperation.

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

RESOLUTION #2016/944: Final Determination pursuant to the Audit: Review, Evaluation and Monitoring of the Office of the Queens County Public Administrator's Employment Practices and Procedures from July 1, 2012 to December 31, 2015.

Whereas, pursuant to Chapter 36, Section 831(d) (2) and (5) of the New York City Charter, the Equal Employment Practices Commission is authorized to audit and evaluate the employment practices, programs, policies, and procedures of city agencies and their efforts to ensure 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 36, Section 831(d)(2), this Commission has adopted *Uniform Standards for EEPC Audits* and *Minimum Equal Employment Opportunity Standards for Community Boards* to assess agencies' EEO programs and policies for compliance with federal, state and local laws, regulations, policies and procedures which are designed to increase equality of opportunity for women, minorities, and other employees and job applicants identified for protection from discrimination in employment within municipal government; and

Whereas, pursuant to its audit of the Office of the Queens Public Administrator's (QCPA) Employment Practices and Procedures from July 1, 2012 to December 31, 2015, the Equal Employment Practices Commission (EEPC) issued a Preliminary Determination letter, dated May 11, 2016, setting forth findings and the following required corrective actions:

1. Ensure that the principal EEO/HR Professional reviews the agency's statistical information (i.e. workforce, hires, promotions, and separations by race/ethnicity and gender), employment practices, policies and programs on an annual basis to identify whether there are barriers to equal opportunity within the agency and determine what, if any, corrective actions are required in order to correct deficiencies (e.g. underutilization or adverse impact). If necessary, consult with the Law Department, Division of Citywide Diversity and EEO, or another resource for guidance.
2. Use and maintain an applicant/candidate log or tracking system which, addition to the aforementioned fields, also captures the ethnicity of the candidate and interviewers' names. Ensure that the process avoids the appearance of bias by delegating the responsibility for recording and maintaining this information to an individual other than the hiring manager.
3. Designate a professional with appropriate training, knowledge and familiarity with career opportunities in City government to provide career counseling to employees upon request. Remind employees of the identity/type of guidance available from the Career Counselor at least once each year.
4. Ensure that employees have access to information regarding performance evaluation standards.

5. Maintain appropriate documentation of meetings and other communications between the agency head (or a direct report other than the General Counsel) and the principal EEO Professional regarding decisions that impact the administration and operation of the EEO program.
6. Establish and implement an annual managerial/non-managerial performance evaluation program (with timetable) to be used for probationary periods, promotions, assignments, incentives and training.
7. Ensure that the managerial performance evaluation form contains a rating for EEO (which covers responsibilities and processes for assuring their ability to make employment decisions based on merit and equal consideration, or treat others in an equitable and impartial manner).
8. Submit to the EEPC an Annual Plan of measures and programs to provide equal employment opportunity, and quarterly reports (up to 30 days following each quarter) on efforts to implement the plan.

Whereas, the agency submitted its response to the EEPC's Preliminary Determination letter, on May 19, 2016 with documentation of its efforts to rectify required corrective actions nos. 2, 4 and "Final Action"; and

Whereas, in accordance with Chapter 36, Section 832(c) of the New York City Charter, the EEPC considered the agency's response and issued a Final Determination on June 2, 2016 which indicated that corrective action(s) nos. 1, 2, 3, 4, 5, 6, 7 and 8 require compliance monitoring; and

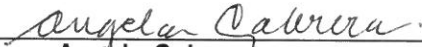
Whereas, in accordance with Chapter 36, Section 832 (c) of the City Charter, the EEPC is required to monitor the agency for a period not to exceed six months, from June 2016 through November 2016, to determine whether it implemented remaining required corrective actions; and

Whereas, in accordance with Chapter 36, Section 832 (c) of the City Charter, the agency is required to respond in 30 days and make monthly reports thereafter to the Commission on the progress of implementation of such corrective actions; and

Whereas, all of the EEPC's corrective actions are required by, or are consistent with, federal, state and local laws, regulations, policies and procedures which are designed to increase equality of opportunity for women, minorities, and other employees and job applicants identified for protection from discrimination in employment within municipal government; Now Therefore,

Be It Resolved that the Commission will forward this Final Determination to Public Administrator Lois A. Rosenblatt of the Office of the Queens County Public Administrator.

Approved unanimously on June 16, 2016.



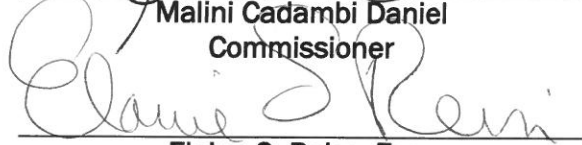
Angela Cabrera
Commissioner



Arva Rice
Commissioner



Malini Cadambi Daniel
Commissioner



Elaine S. Reiss, Esq.
Commissioner



Queens County Office of the Public Administrator

Lois M. Rosenblatt, Esq.
Public Administrator

Susan B. Brown
Deputy Public Administrator

Gerard J. Sweeney, Esq.
Counsel

July 5, 2016

NYC
Equal Employment Practices Commission
253 Broadway, Suite 602
New York, NY 10007

Attention: Charise L. Terry, PHR
Executive Director

RE: Audit Resolution Response – 2016

Dear Ms. Terry:

This is in response to your Final Determination and findings dated June 6, 2016.

With respect to Corrective Action #1:

We have been communicating with Jodi Bryon, Director of Workforce Analytics, to determine the appropriate method of analysis to best suit this Agency.

Corrective Action #2:

In the event of a vacancy, we will utilize an updated applicant candidate log and Voluntary Self-Identification form for race and ethnicity. Copies of these documents are attached hereto.

Corrective Action #3:

We will continually forward relevant job postings and notifications of City exams to all employees. As recent as June 7, 2016, employees were notified of City Exams Open to the Public via email. Copy of the email is attached hereto.

Charise L. Terry, PHR
July 5, 2016
Page two

Corrective Action #5:

The Public Administrator and Principal EEO Officer (the Deputy Public Administrator) have resolved to conduct monthly communications, either in person or via email, that directly involve relevant EEO matters. As recent as June 3, 2016, my Principal EEO Officer informed me that she would be attending the June 22, 2016 EEO Seminar conducted at NY Law School. Attached hereto is a copy of the email and attendance certificate.

Corrective Action #6:

On June 7, 2016, my Principal EEO Officer forwarded to each employee a self-appraisal form to be completed. All forms were completed and returned. Attached hereto is a copy of the email and self-appraisal form.

Corrective Action #7:

Attached please find copy of Surrogate's Court Procedure Act, Article 11, Sections 1102 and 1103 documenting the appointments of the Public Administrator and Deputy Public Administrator.

Finally, we look forward to your further guidance on those Corrective Actions not mentioned above.

Very truly yours,



LOIS ROSENBLATT
PUBLIC ADMINISTRATOR

cc: Susan B. Brown, Deputy Public Administrator
Principal EEO Officer



Queens County Office of the Public Administrator

Lois M. Rosenblatt, Esq.
Public Administrator

Susan B. Brown
Deputy Public Administrator

Gerard J. Sweeney, Esq.
Counsel

MEMORANDUM

To: All Employees
From: Lois Rosenblatt, Public Administrator *LR*
Re: Equal Employment Practices Commission
Subject: Audit of Queens County Public Administrator's Office
Date: May 19, 2016

Please be advised that the New York City Equal Employment Practices Commission has been conducting an audit of the practices and policies of this office.

The EEPC has made certain recommendations to this office so that everyone fully understands the function of the EEPC and your rights as they pertain thereto. As a result of their audit, the following corrective actions were recommended:

- 1) Ensure that the principal EEO/HR Professional (SB) reviews the agency's statistical information (e.g. workforce, hires, promotions and separations by race/ethnicity and gender,) employment practices, policies and programs on an annual basis to identify whether there are barriers to equal opportunity within the agency and determine what, if any, corrective actions are required in order to correct deficiencies (e.g. underutilization or adverse impact.) If necessary, consult with the Law Department, Division of Citywide Diversity and EEO or another resource for guidance.

Our response to this corrective action is as follows:

“We have consulted with Jocelyn Tan Lobo, Executive Director of Compliance with DCAS, for her guidance on the appropriate method for recording and reviewing statistical data. Upon receipt of her response, this agency will ensure that the Deputy Public Administrator/EEO Professional shall review all data on an annual basis.”

Continued...

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

RESOLUTION #2016/944C-12: Determination of Compliance (Monitoring Period Required) by the Office of the Queens County Public Administrator with the Equal Employment Practices Commission's required corrective actions pursuant to the Review, Evaluation and Monitoring of the Office of the Queens County Public Administrator's Employment Practices and Procedures from July 1, 2012 to December 31, 2015.

Whereas, pursuant to Chapter 36, Section 831(d)(2) and (5) of the New York City Charter, the Equal Employment Practices Commission is authorized to audit and evaluate the employment practices, programs, policies, and procedures of city agencies and their efforts to ensure 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 36, Section 831(d)(2), this Commission has adopted *Uniform Standards for EEPD Audits* and *Minimum Equal Employment Opportunity Standards for Community Boards* to assess agencies' EEO programs and policies for compliance with federal, state and local laws, regulations, policies and procedures which are designed to increase equality of opportunity for women, minorities, and other employees and job applicants identified for protection from discrimination in employment within municipal government; and

Whereas, pursuant to its audit and analysis of the Office of the Queens County Public Administrator's (QCPA) Employment Practices and Procedures, the Equal Employment Practices Commission (EEPC) issued a Preliminary Determination letter, dated May 11, 2016, setting forth findings and the following required corrective actions:

1. Ensure that the principal EEO/HR Professional reviews the agency's statistical information (i.e. workforce, hires, promotions, and separations by race/ethnicity and gender), employment practices, policies and programs on an annual basis to identify whether there are barriers to equal opportunity within the agency and determine what, if any, corrective actions are required in order to correct deficiencies (e.g. underutilization or adverse impact). If necessary, consult with the Law Department, Division of Citywide Diversity and EEO, or another resource for guidance.
2. Use and maintain an applicant/candidate log or tracking system which, in addition to the aforementioned fields, also captures the ethnicity of the candidate and interviewers' names. Ensure that the process avoids the appearance of bias by delegating the responsibility for recording and maintaining this information to an individual other than the hiring manager.
3. Designate a professional with appropriate training, knowledge and familiarity with career opportunities in City government to provide career counseling to employees upon request. Remind employees of the identity/type of guidance available from the Career Counselor at least once each year.
4. Ensure that employees have access to information regarding performance evaluation standards.
5. Maintain appropriate documentation of meetings and other communications between the agency head (or a direct report other than the General Counsel) and the principal EEO Professional regarding decisions that impact the administration and operation of the EEO

program.

6. Establish and implement an annual managerial/non-managerial performance evaluation program (with timetable) to be used for probationary periods, promotions, assignments, incentives and training.
7. Ensure that the managerial performance evaluation form contains a rating for EEO (which covers responsibilities and processes for assuring their ability to make employment decisions based on merit and equal consideration, or treat others in an equitable and impartial manner).
8. Submit to the EEPC an Annual Plan of measures and programs to provide equal employment opportunity, and quarterly reports (up to 30 days following each quarter) on efforts to implement the plan.

Whereas, the QCPA submitted its response to the EEPC's Preliminary Determination letter, on May 19, 2016, and

Whereas, in accordance with Chapter 36, Section 832(c) of the New York City Charter, the EEPC considered the agency's response and issued a Final Determination on June 2, 2016, with corrective actions #1 through #8, remaining;

Whereas, the QCPA submitted its response to the EEPC's final determination letter, on July 5, 2016, and

Whereas, in accordance with Chapter 36, Section 832(c) of the New York City Charter, the EEPC monitored the agency's implementation of the remaining corrective actions from June, 2016 to September, 2016 with no extension of the monitoring period;

Whereas, at the EEPC's request pursuant to Section 815.a.(15) of the New York City Charter, the QCPA submitted a copy of the agency head's memorandum to staff dated May 19, 2016, which outlined the corrective actions implemented in response to the EEPC's audit and reiterated his commitment to the agency's EEO Program; and

Whereas, all of the EEPC's corrective actions are required by, or are consistent with, federal, state and local laws, regulations, policies and procedures which are designed to increase equality of opportunity for women, minorities, and other employees and job applicants identified for protection from discrimination in employment within municipal government; Now Therefore,

Be It Resolved, that the Office of the Queens County Public Administrator has implemented the required corrective actions deemed necessary to ensure compliance with the equal employment opportunity standards of this Commission and requirements of Chapters 35 and 36 of the City Charter.

Be It Resolved, that the Commission approves issuance of this Determination of Compliance to Public Administrator Lois A. Rosenblatt, of the Office of the Queens County Public Administrator.

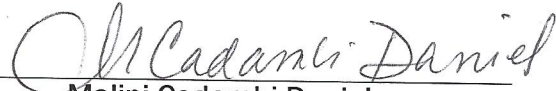
Approved unanimously on September 9, 2016.



Angela Cabrera
Commissioner



Arva Rice
Commissioner



Malini Cadambi Daniel
Commissioner

Absent

Elaine S. Reiss, Esq.
Commissioner



Angela Cabrera
Malini Cadambi Daniel
Elaine S. Reiss, Esq.
Arva R. Rice
Commissioners

Charise L. Terry, PHR
Executive Director

Judith Garcia Quiñonez, Esq.
Executive Agency Counsel/
Deputy Director

Marie E. Giraud, Esq.
Agency Attorney/
Director of Compliance Monitoring

253 Broadway
Suite 602
New York, NY 10007

212. 615. 8939 tel.
212. 615. 8931 fax

BY MAIL AND EMAIL

September 9, 2016

Lois A. Rosenblatt
Public Administrator
Queens County Public Administrator's Office
88-11 Sutphin Boulevard, Suite 61
Jamaica NY 11435

Re: Resolution #2016/944C-12 Determination of Agency Compliance

Dear Public Administrator Rosenblatt:

On behalf of the members of the Equal Employment Practices Commission (EEPC or Commission), I want to formally inform you that the Commission has issued the attached Determination of Compliance to the Queens County Public Administrator's Office. This Commission has determined that the Queens County Public Administrator's Office has implemented the required corrective actions deemed necessary by this Commission for ensuring a fair and effective affirmative employment program of equal opportunity as required by the equal employment opportunity standards of this Commission and Chapters 35 and 36 of the New York City Charter.

On behalf of this Commission, I want to thank you and EEO Officer Susan Brown for the cooperation extended to the EEPC during the compliance-monitoring period.

Sincerely,


Angela Cabrera
Commissioner

c: Susan Brown, Principal EEO Professional
Marie E. Giraud, Esq. Agency Attorney / Director of Compliance

EEPC

EQUAL EMPLOYMENT PRACTICES COMMISSION

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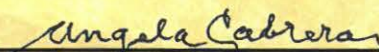
Determination of Compliance

is issued to the

Office of the Queens County Public Administrator

for successfully implementing #8 of # 8 required corrective actions pursuant to the Equal Employment Practices Commission's Employment Practice and Procedures Audit from June 2, 2016 to this date.

On this 9th day of September in the year 2016,



Angela Cabrera, Commissioner



Charise L. Terry, PHR, Executive Director

In care of Public Administrator Lois A.
Rosenblatt and Principal EEO
Professional Susan Brown