



## SUMMARY COMPLIANCE REPORT

**Agency:** New York City Housing Development Corporation  
**Agency Head:** President Marc E. Jahr  
**EEO Officers:** Mary McConnell  
**Audit Period:** January 1, 2007 to December 31, 2009  
**Agency Census as of June 30, 2010:** 162

*Date of Preliminary Determination Letter:* July 28, 2011  
*Date of Response Letter:* August 12, 2011  
*Date EEPC Final Determination Letter:* September 28, 2011

*Compliance Initiated:* October 18, 2012  
*Compliance Completed:* December, 2012  
*Covering Months:* November, 2011 to April, 2012

**Date:** January 24, 2013

Pursuant to the findings and recommendations of the Equal Employment Practices Commission's (Commission or EEPC) Audit of Compliance by the New York City Housing Development Corporation (HDC) with its Equal Employment Opportunity Policy (EEOP), EEPC initiated Audit Compliance with the HDC on October 18, 2012. The compliance period was extended through December, 2012 in order to confirm the successful completion of training for both EEO Counselors. The HDC submitted its final Monthly Compliance Report on December 19, 2012, and submitted supplemental documentation on January 24, 2013.

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

**1. To afford employees the opportunity to exercise their right to file an external complaint with a federal, state or local administrative agency, the Discrimination Complaint Procedure should be revised to include the current addresses and phone numbers of the New York City Commission on Human Rights, the New York State Division of Human Rights and the U.S. Equal Employment Opportunity Commission. (Commission's Position, EEPC/Sect. 831, City Charter)**

The agency has updated its Discrimination Complaint Procedure to include the addresses and phone numbers of agencies employees may contact to file an external complaint. The agency provided a copy of the *Discrimination Complaint Procedure*.

SUMMARY COMPLIANCE REPORT

The implementation of the required action was accepted in December, 2011.

**2. The agency head, or a direct report should sign off on all final internal discrimination reports to indicate that they have been reviewed and whether the recommendations, if any, have been approved and adopted. Such sign off may be in written or electronic form. (The HDC Discrimination Complaint Procedure and EEPC/Sect. 831, City Charter)**

Since there were no complaints made during the compliance monitoring period, the agency expressed its commitment to institute this practice via its *Discrimination Complaint Procedure* that was distributed to all its employees.

The implementation of the required action was accepted in December, 2011.

**3. The EEO Officer should communicate the decision to the parties, in writing, in a discreet and confidential manner, indicating the conclusion reached; whether the misconduct alleged has been substantiated; and the agency's opposition to that kind of activity. (The HDC Discrimination Complaint Procedure)**

Since there were no complaints made during the compliance monitoring period, the agency expressed its commitment to institute this practice via its *Discrimination Complaint Procedure* that was distributed to all its employees.

The implementation of the required action was accepted in December, 2011.

**4. Because EEO representatives should be trained in federal, state, and city EEO laws and procedures and know how to carry out their responsibilities under the agency's EEOP, the Officer/Counselor(s) should attend the next available DCAS training session for EEO professionals or enroll in training conducted by another appropriate agency or school. The EEO Officer/Counselor(s) should obtain a certificate of completion. (Commission's Position and EEPC/Sect. 831, City Charter)**

The HDC EEO Officer attended the Cornell University School of Industrial and Labor Relations (Cornell ILR) *EEO Refresher for EEO Officers* course in May 2005. The EEO Counselor attended the Cornell ILR *Harassment Prevention in the Workplace*, on December 14, 2012. The curriculum was accepted as training for EEO professionals. The agency provided a copy of the certificate of completion.

The implementation of the required action was accepted in December, 2012.

**5. In addition to the above recommendations, after implementation of the above corrective**



**Equal Employment  
Practices Commission**

SUMMARY COMPLIANCE REPORT

5. In addition to the above recommendations, after implementation of the above corrective actions, the Commission requires that the agency head distribute a memorandum to all staff informing them of the changes that are being implemented in the agency's EEO program pursuant to the audit. This memorandum should re-emphasize the agency head's commitment to the agency's EEO Program.

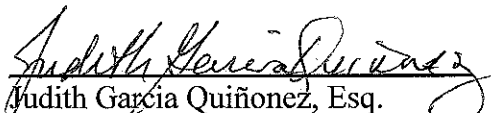
The attached memorandum from President Marc E. Jahr was sent to HDC employees on January 25, 2013 .


The implementation of the required action was accepted in January, 2013.

**Recommendation**

Based on the above information, we recommend that the Equal Employment Practices Commission issue a Letter of Completion of Compliance to the President, Marc E. Jahr, informing him that the New York City Housing Development Corporation has implemented the recommended corrective actions to the Commission's satisfaction.

Respectfully Submitted,

  
Judith Garcia Quifonez, Esq.  
Agency Counsel  
Director of Compliance

  
Charise L. Hendrieks, PHR  
Executive Director

Attachment