



# EQUAL EMPLOYMENT PRACTICES COMMISSION

City of New York

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April 26, 2001

Nicholas Scoppetta  
Commissioner  
Administration for Children's Services  
150 William Street  
New York, NY 10038

Re: Preliminary Determination Pursuant to the Audit of the Administration for Children's Services (ACS) and its Compliance with the City's Equal Employment Opportunity Policy from July 1, 1997 to December 31, 1999.

Dear Commissioner Scoppetta:

Pursuant to Chapter 36 of the New York City Charter, the Equal Employment Practices Commission (EEPC) is empowered 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. (New York City Charter, Chapter 36, sections 831(d)(2) and (5)).

This letter contains the preliminary determinations of EEPC pursuant to its audit of compliance by the Administration for Children's Services (ACS) during the thirty-month period commencing July 1, 1997 and ending December 31, 1999. Requests for corrective actions and/or recommendations are included where the EEPC has determined that ACS has failed to comply in whole or in part with the City's EEO Policy.

Pursuant to the New York City Charter, as amended, the Department of Citywide Administrative Services has issued the City's Equal Employment Opportunity Policy (EEOP), a set of uniform standards and procedures designed to ensure the equality of opportunity for municipal government employees and job applicants. The EEOP directs agencies to develop agency-specific plans for providing equal employment opportunity within the parameters of these standards and procedures. Accordingly, all recommendations for corrective actions included in this letter are consistent with both the audit findings and the standards set forth in the EEOP. Therefore, the Administration for Children's Services, where appropriate, should incorporate these recommendations

in its agency-specific Equal Employment Opportunity Plan. The relevant sections of the City's Equal Employment Opportunity Policy are cited in parenthesis at the end of each recommendation.

The purpose of this audit is to evaluate the agency's compliance with the EEOP, not to issue findings of discrimination pursuant to the New York City Human Rights Law.

### **Scope and Methodology**

Audit methodology included an analysis of ACS' quarterly reports. EEPC also analyzed Citywide Equal Employment Database System data (CEEDS) by which ACS determines underutilizations and concentrations of targeted groups within the workforce. These designations represent 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. Where CEEDS data revealed underutilizations within the ACS workforce, the auditors determined whether the agency had undertaken measures to correct those underutilizations.

EEPC auditors also conducted in-depth, on-site interviews with ACS' EEO Officer, an EEO Investigator/Trainer and the Assistant Commissioner for Personnel. In addition, EEPC auditors interviewed 15 supervisors to determine awareness of their rights and responsibilities under the EEOP. The results of these interviews are attached. (Appendix 1)

A survey of 892 people employed by ACS during the audit period was distributed. (This number excludes 108 surveys which were returned as undeliverable.) One hundred and twenty-three people (13.8%) responded. Significant survey findings are discussed in the proceeding pages.

### **Description of the Agency**

The Administration for Children's Services was created on January 11, 1996 from the child welfare divisions of the Human Resources Administration/Department of Social Services, to make the mission of providing for the safety, care and nurturing of New York City's children the sole objective of one agency. ACS fulfills this mandate by: 1) acting as a child protective service, receiving and investigating reports of child abuse and neglect; 2) assisting families at risk by addressing the causes of abuse and neglect; 3) providing children and families with preventive services to avert the impairment or disruption of families; 4) placing a child in temporary foster care or permanent adoption when preventive services cannot redress causes of child maltreatment; 5) assisting in bringing to justice any person who criminally injures a child; 6) providing opportunities for children's growth and development through child/day care and Head Start services; 7) providing services to ensure that legally responsible parents provide child support; and 8) issuing child performer permits.

### **Discrimination Complaint Activity During the Audit Period**

During the audit period, 23 internal discrimination complaints were filed. Twelve were based on disability, four on national origin, four on sexual harassment, two on religion and one on race. Twelve complaints received "probable cause" determinations, three received "no probable cause"

determinations, three were administratively closed and five were pending at the end of the audit period.

Forty-six complaints were filed with Federal, State and City human rights agencies during the audit period. Seven were based on race, five on disability, four on age, two on sex/gender, two on retaliation, one on race and 25 were based on multiple categories. Seventeen complaints were dismissed, four were closed, 1 received a "probable cause determination," one received a "no probable cause" determination, four were listed as "not applicable" and 19 were pending at the end of the audit period.

## **PRELIMINARY DETERMINATION**

Following are our preliminary determinations with required corrective actions and recommendations pursuant to the audit.

### **Plan Dissemination - Internally**

ACS is in compliance with the following requirements:

1. The agency's EEO policy statements (general, sexual harassment, disabilities, anti-retaliation), as well as the Discrimination Complaint Procedures, are included in ACS' EEO Policy booklet and distributed to employees on an "on-going" basis.
2. The EEO Policy booklet is distributed at EEO training sessions and orientation sessions for new hires and Work Experience Program (WEP) participants.
3. ACS' EEO policies are available in large print and on audio cassette.

ACS is in partial compliance with the following requirement:

Although the agency's EEO policies were posted on agency bulletin boards during the audit period, the EEO Officer and EEO Investigator/Trainer told EEPC auditors that their office did not conduct on-site visits to inspect the bulletin boards. In addition, 65 of the 120 survey respondents (54%) indicated that the EEO policy statement was not posted on agency bulletin boards. Corrective action is required.

Recommendation: The EEO Office should periodically monitor agency bulletin boards to insure posting of EEO policy statements in ACS facilities throughout the five boroughs. (Sect. VII, EEOP)

ACS is not in compliance with the following requirement:

Twelve of the 15 (80%) supervisors/managers interviewed by EEPC auditors indicated that the agency had never evaluated their EEO performance. Corrective action is required.

Recommendation: All supervisors/managers should be rated on EEO performance in their annual performance evaluations. (Sect. VII, EEOP)

### **Plan Dissemination - Externally**

ACS is in compliance with the following requirements:

1. All of ACS' Job Vacancy Postings indicate that the agency is an equal opportunity employer.
2. The eight job advertisements submitted by ACS (all in the *New York Times*) contain the EEO tag line.

### **Affirmative Action and Reasonable Accommodations for Persons with Disabilities**

ACS is in compliance with the following requirements:

1. The EEO Officer serves as the Disability Rights Coordinator.
2. A reasonable accommodation procedure is included in the agency's EEO Policy booklet.
3. The agency provided reasonable accommodations to 18 employees with disabilities during the audit period. Such accommodations included acquisition of equipment or devices and work schedule modifications.
4. ACS distributed a City brochure to all employees regarding the 55-A Program and 10 employees currently participate in that program.
5. A survey conducted by ACS' Office of Facilities found that almost all of the 43 sites which house ACS employees—including the major sites—are accessible to persons with physical disabilities.

### **EEO Complaint and Investigation System**

ACS is in compliance with the following requirements:

1. All of the agency's EEO professionals (EEO Officer and EEO Investigators/Trainers) have attended DCAS' basic EEO training course.

2. The EEO Officer maintains and updates a monthly discrimination complaint log.

ACS is not in compliance with the following requirements:

1. Prior to July 1999, the EEO Office had three EEO professionals who were authorized to investigate discrimination complaints—two females (EEO Officer and EEO Investigator/Trainer) and one male (EEO Investigator/Trainer). In that month, the male EEO Investigator resigned and was

replaced by a female. Consequently, during the latter part and end of the audit period, there were no males on staff to investigate complaints. The EEO Officer informed EEPC auditors that ACS has selected another EEO Investigator/Trainer ( a male). The agency is waiting for approval to hire that individual. Corrective action is required.

Recommendation: To insure that individuals of both sexes are available to receive and investigate discrimination complaints, ACS should aggressively seek approval to hire the male EEO Investigator/Trainer. (Sect. VII, EEOP)

2. ACS submitted copies of the EEO Officer's findings and recommendations for four internal discrimination complaints filed during the audit period. All of the EEO Officer's reports were issued more than three months after the filing of the complaints. (Case No. 18-98, six months; Case No. 09-98, nine months; Case No. 03-98, six months; Case No. 01-99, seven months.) Corrective action is required.

Recommendation: ACS should investigate and resolve all internal discrimination complaints within the 90-day time frame required by the EEOP's Discrimination Complaint Procedures Implementation Guidelines (April 2, 1996 Amendment).

3. The EEO Officer told EEPC auditors that ACS does not utilize EEO Counselors; she believes the agency is too large for them and EEO Counselors would pose breach of confidentiality problems. The EEO Officer prefers to have a centralized counseling and investigation process. Corrective action is required.

Recommendation: At a minimum, the agency should appoint an EEO Counselor for each borough. (ACS has 1,088 employees in the Bronx, 1,760 in Brooklyn, 3,712 in Manhattan, 981 in Queens, and 152 in Staten Island.) EEO Counselors serve as the eyes and ears of the EEO Office and may bring important EEO issues to the attention of the EEO Officer. They would also be more accessible to employees who work outside of the central office, where the EEO Investigators are located. (Sect. VII, EEOP)

## **EEO Training**

ACS is in compliance with the following requirement:

ACS has developed an EEO training program based on the format developed by DCAS. This program is conducted by the two EEO Investigators/Trainers, who have attended the DCAS training for EEO professionals. According to the EEO Officer, approximately 2,500 employees have been trained each fiscal year. In addition, almost all of the supervisors/managers interviewed by EEPC auditors indicated they and their subordinates have received preventive sexual harassment training.

## **Addressing Underutilization**

ACS is not in compliance with the following requirement:

ACS' Chief of Staff submitted a list of recent newspaper job advertisements (which is in addition to copies of ads submitted by the EEO Office). Only one of the 4 titles was advertised in minority publications (the position of ASA & Procurement Analyst was advertised in *El Diario* and *Amsterdam News*). The other three titles--Child Welfare Specialists, Psychologist & Psychiatrists and Manager-- were advertised in the *New York Times*, *Psychiatric News* and *APA Monitor*.

During part of the audit period, DCAS issued CEEDS data which ACS could have used to identify and address underutilizations of women and minorities. Methods to address such underutilizations could have included the use of additional minority and female newspaper advertisements, and outreach to minority and/or female professional organizations.

Since DCAS suspended issuance of CEEDS data during the latter part of the audit period, there is currently no official method for the audited agency to determine underutilizations.

### Selection

ACS is not in compliance with the following requirements:

1. According to the EEO Officer, only employees in the personnel department have been directed to attend structured interview training. The EEO Office notifies other employees by memo of upcoming structured interview training offered by DCAS; they may choose to enroll in those sessions. The EEO Office has no way of knowing how many employees (including supervisors/managers) elect to enroll in DCAS training. In addition, 9 of the 15 (60%) supervisors/managers interviewed by EERC auditors indicated they had not received such training. Corrective action is required.

Recommendation: ACS should ensure that all employees involved in interviewing receive structured interview training, either through internal training or training provided by DCAS. (Sect. VII, EEOP)

2. The EEO Officer informed EEPC auditors that her agency has not conducted adverse impact studies because ACS has not received training on that topic from DCAS. Corrective action is required.

Recommendation: Although the EEOP requires City agencies to conduct adverse impact studies, technical assistance from DCAS is necessary to accomplish that task. ACS should therefore petition the Office of Citywide Equal Employment Opportunity of DCAS to obtain the necessary assistance to conduct adverse impact studies. (Sect VI, EEOP)

### Promotional Opportunities

The EEO Officer informed EEPC auditors that the Assistant Commissioner for Personnel has been designated as the Career Counselor. The Assistant Commissioner told EEPC auditors, however, that he is not the agency's Career Counselor; he is "too busy" and "supervises too many people" to provide individual guidance to ACS employees. Employees seeking career counseling usually contact

members of the recruitment staff after they (employees) receive ACS or citywide job vacancy notices. In addition, 118 of the 121 individuals (97.5%) who responded to the voluntary employee survey indicated they do not know the name of the person responsible for providing career counseling. Corrective action is required.

Recommendation: To insure that employees receive career guidance from a trained professional, ACS should officially appoint a person familiar with civil service and provisional jobs to provide career counseling to employees who request it. In addition, ACS should inform all employees in writing of the identity, location and telephone number of that individual. (Sect. VI, EEOP)

### **EEO Officer Reporting Arrangement**

ACS is in compliance with the following requirement:

The EEO Officer reports to the Deputy Commissioner for Administration, meets with him on a monthly and "as needed" basis, and prepares agendas for and keeps notes of those meetings.

### **EEO Officer Responsibilities**

ACS is in compliance with the following requirement:

The EEO Officers spends 100% of her time on EEO matters.

ACS is not in compliance with the following requirements:

1. During the overview meeting with EEPC auditors, the EEO Officer stated that she is not involved in developing or reviewing recruitment strategies; that is the sole responsibility of the personnel department. The EEO Officer is, however, provided with copies of job advertisements and internal recruitment material (i.e., job postings). Corrective action is required:

Recommendation: The EEO Officer should be involved in developing recruitment strategies and selecting recruitment media, including newspapers and other publications. (Sect. VII, EEOP)

2. In response to an EEPC query, the EEO Officer stated that she could use *two* additional investigators, since her office receives a large number of EEO inquiries. Corrective action is required.

Recommendation: To meet its obligations under the EEOP, ACS (which has a staff of more than 7,000 employees) should hire another EEO investigator—in addition to the male investigator awaiting hiring approval. (Sect. VII, EEOP)

### **Supervisory Responsibility in EEO Plan Implementation**

Although the EEO Officer informed EEPC auditors that supervisors and managers have been directed to discuss the agency's EEO policies with their subordinates, there is no way of routinely

insuring that these meetings take place. Occasionally, in response to a particular problem or issue, managers are directed to discuss the EEO policies with their subordinates and submit a memo regarding those meetings. In addition, 6 of the 15 (40%) supervisors/managers interviewed by EEPC auditors and 68 of the 120 individuals (56%) who responded to the voluntary employee survey indicated that meetings to discuss the agency's EEO policies were never held.

Recommendation: It is the Commission's position that supervisors should hold documented meetings with their staffs to emphasize their (supervisors') commitment to the agency's EEO policies and reaffirm the right of each employee to file a discrimination complaint with the EEO Office.

### **Special Problem/Contingency**

1. During the EEPC public hearing with ACS and several pre- and post-audit meetings with ACS officials, EEPC was informed that the agency does not have access to the race and sex data of its employees after that information is initially captured during the hiring process. Consequently, ACS enlisted the assistance of the MIS Division of DCAS to respond to the Commission's Document and Information Request form. However, despite several requests, a letter to Commissioner Scopetta, a meeting with Deputy Commissioner Benanti, and a follow-up letter to Deputy Commissioner Benanti, ACS failed to provide its job title numbers to DCAS. Consequently, DCAS could not submit the race and sex data by job groups to EEPC by February 2001—15 months after commencement of this audit.

At the audit exit meeting of April 12, 2001, Deputy Commissioner Benanti responded to this issue by stating that ACS cooperated fully and promptly with DCAS in an effort to obtain the requested audit data. Deputy Commissioner Benanti also told EEPC that he was unaware that DCAS needed additional information to prepare the requested reports. DCAS informed EEPC, however, that although ACS provided it (DCAS) with a diskette, it did not contain the necessary job title codes. In a letter dated April 1, 2001 and hand delivered to the EEPC on April 16, 2001 (four days after the audit exit meeting), DCAS provided the ACS personnel data, broken down by race and sex.

Due to this extensive delay discussed above, the Commission was forced to issue its preliminary determinations without a review of ACS' personnel activity during the audit period. Failure to provide this data directly conflicts with section 831b of the New York City Charter. Providing the data as requested, 17 months after the initial request, is unacceptable.

Additionally, the EEO Officer must have easy and regular access to the race and sex data of its employees to meet her obligations under the City's EEO Policy. For example, the EEO Officer must have access to that information to determine if a selection device (including selection devices for hiring, promotion or training) adversely impacts any particular racial, ethnic, disability or gender group. Access to race and sex data is also critical to effectively investigate and resolve individual and group complaints of discrimination. Furthermore, no other City agency audited by the EEPC has claimed inaccessibility to the race and sex data of its employees. Corrective action is required.

Recommendation: To meet its obligations under the EEOP, the agency should develop an internal method which allows its EEO Officer to have easy and regular access to the race and sex data of its employees. (Sect. III and VI, EEOP)



2. Seventy-four percent of survey respondents indicated they do not know who the EEO Officer is. Corrective action is required.

Recommendation: All employees should receive written notification of the identity, location and telephone number of the agency's EEO Officer. (Sect. VIII, EEOP)

### **SUMMARY OF RECOMMENDED CORRECTIVE ACTION**

1. The EEO Office should periodically monitor agency bulletin boards to insure posting of EEO policy statements in ACS facilities throughout the five boroughs. (Sect. VII, EEOP)
2. All supervisors/managers should be rated on EEO performance in the annual performance evaluations. (Sect. VII, EEOP)
3. To ensure that individuals of both sexes are available to receive and investigate discrimination complaints, ACS should aggressively seek approval to hire the male EEO Investigator/Trainer. (Sect. VII, EEOP)
4. ACS should investigate and resolve all internal discrimination complaints within the 90-day time frame required by the EEOP's Discrimination Complaint Procedures Implementation Guidelines (April 2, 1996 Amendment).
5. The agency should appoint an EEO Counselor for each borough. (Sect. VII, EEOP)
6. ACS should ensure that all employees involved in interviewing receive structured interview training, either through internal training or training provided by DCAS. (Sect. VII, EEOP)
7. ACS should petition the Office of Citywide Equal Employment Opportunity of DCAS to obtain the necessary assistance to conduct adverse impact studies. (Sect. VI, EEOP)
8. To ensure that employees receive career guidance from a trained professional, ACS should officially appoint a person familiar with civil service and provisional jobs to provide career counseling to employees who request it. In addition, ACS should inform all employees in writing of the identity, location and telephone number of that individual. (Sect. VI, EEOP)
9. The EEO Officer should be involved in developing recruitment strategies and selecting recruitment media, including newspapers and other publications. (Sect. VII, EEOP)
10. To meet its obligations under the EEOP, ACS should hire another EEO Investigator—in addition to the male Investigator awaiting hiring approval. (Sect. VII, EEOP)
11. Supervisors/managers should hold documented meetings with their staffs to emphasize their (supervisors') commitment to the agency EEO policies and reaffirm the right of each employee to file a discrimination complaint with the EEO Office.

12. To meet its obligations under the EEOP, ACS should develop an internal method which allows its EEO Officer easy and regular access to the race and sex data of its employees. (Sect. III and VI, EEOP)
13. All employees should receive written notification of the identity, location and telephone number of the agency's EEO Officer. (Sect. VIII, EEOP)

### Conclusion

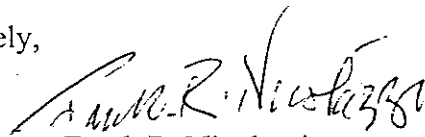
Pursuant to Chapter 36 of the New York City Charter and the previously cited preliminary determinations in relation to EEPC's audit of ACS' compliance with the City's Equal Employment Opportunity Policy, we respectfully request your response to the aforementioned preliminary determinations.

Your response should indicate what corrective actions ACS will take, and which recommendations it intends to incorporate into its Equal Employment Opportunity Plan, where appropriate, to comply with the City's Equal Employment Opportunity Policy. As ACS officials informed us during the exit meeting of April 12, 2001, your agency has already implemented some of our recommended corrective actions. Please forward your response within thirty days of receipt of this letter. Also, forward a copy to Eileen Reilly of the Mayor's Office of Operations.

Pursuant to Section 832 of the New York City Charter, if you do not implement all of the recommendations for corrective actions during a compliance period not to exceed six months, this Commission must publish a report and recommend to the Mayor the appropriate corrective actions that you should implement in your agency's Equal Employment Opportunity Plan.

In closing, we want to thank you and your staff for the cooperation extended to the Equal Employment Practices Commission auditors during the course of this audit. If you have any questions regarding these preliminary determinations, please let us know.

Sincerely,



Frank R. Nicolazzi  
Vice Chairman

## APPENDIX - 1

### Administration for Children's Services Supervisor Interview Results - September/October 2000

We interviewed 15 supervisors at ACS. Eleven of those individuals supervise five or more employees. They represent a diverse group of sexes and ethnicities. Supervisors work in many areas of ACS.

1. Do you supervise at least five employees?

Yes: 11                      No: 3                      NA: 1

2. Are you familiar with the City's EEO Policy: Standards and Procedures?

Yes: 14                      No: 1                      NA:

3. Is the City's EEO Policy available to you? If so, is it available in your work unit, Personnel Office, or EEO Office?

Yes: 15                      No:                      NA:

4. If you have been employed for less than 5 years, have you ever received a new employee orientation session? If so, did it include information on employee rights and responsibilities under the City's EEO Policy?

Yes: 4                      No: 2                      NA: 9

5. Are you familiar with your rights and responsibilities under the City's EEOP? What are they?

Yes: 15                      No:                      NA:

6. Did you hold meetings with your staff to discuss your agency's EEO policies?

Yes: 6                      No: 6                      NA: 3

7. Have you ever conducted orientation sessions for new employees? If so, did you discuss your agency's EEO policies with new employees? Please describe.

Yes: 4                      No: 9                      NA: 2

8. Do you know who your agency's EEO Officer is? What is his/her name?

Yes: 12                      No: 3                      NA:

9. Did the EEO Officer meet with you either as an individual or in a group setting to discuss your rights and responsibilities under the EEOP?

Yes: 9                      No: 6                      NA:

10. Did your agency provide you with training and a structured interview guide for interviewing new hires?

Yes: 5                      No: 9                      NA: 1

11. Have you received your agency's EEO and Sexual Harassment Policy Statements?

Yes:15                      No:                      NA:

12. Were you informed that EEO performance will be a part of your overall performance evaluation and will be considered in determining your eligibility for promotions and merit increases? How was this information conveyed to you?

Yes: 8                      No:6                      NA:1

13. Has the agency conducted an evaluation of your EEO performance? If so, when? Has it been included in your evaluation/appraisal?

Yes: 3                      No: 12                      NA:

14. Have you ever received preventive sexual harassment training from your agency? If so, what did you think of it?

Yes: 13                      No:2                      NA:

15. Did all the employees in your unit receive sexual harassment prevention training? When? If not, has training been scheduled?

Yes: 12                      No:2                      NA: 1

16. Are you familiar with your agency's discrimination complaint procedure? Do you have a copy of that procedure?

Yes: 15                      No:                      NA:

17. Have you discussed the agency's discrimination complaint procedures with your staff?

Yes: 4                      No: 11                      NA:

18. Have any employees in your unit complained of sexual harassment discrimination or some other form of discrimination? If so, were you involved?

Yes: 2                      No: 12                      NA: 1

19. Have any employees in your unit ever filed a discrimination complaint with the EEO Office?

Yes: 1                      No:13                      NA: 1

20. If yes, how many have been filed between 1997 and 1999?

Yes: 1                      No:                      NA: 14

21. Did the employee(s) come to you with the problem before a complaint was filed?

Yes: 1                      No:1                      NA: 13

22. To the extent possible, was confidentiality maintained?

Yes:2                      No:                      NA:13

23: Do you feel that you have enough training to address this situation?

Yes: 7

No:

NA: 8

24: Did you contact the EEO Office?

Yes: 1

No: 1

NA: 13

25: Do you have any additional comments, observation that you would care to make?

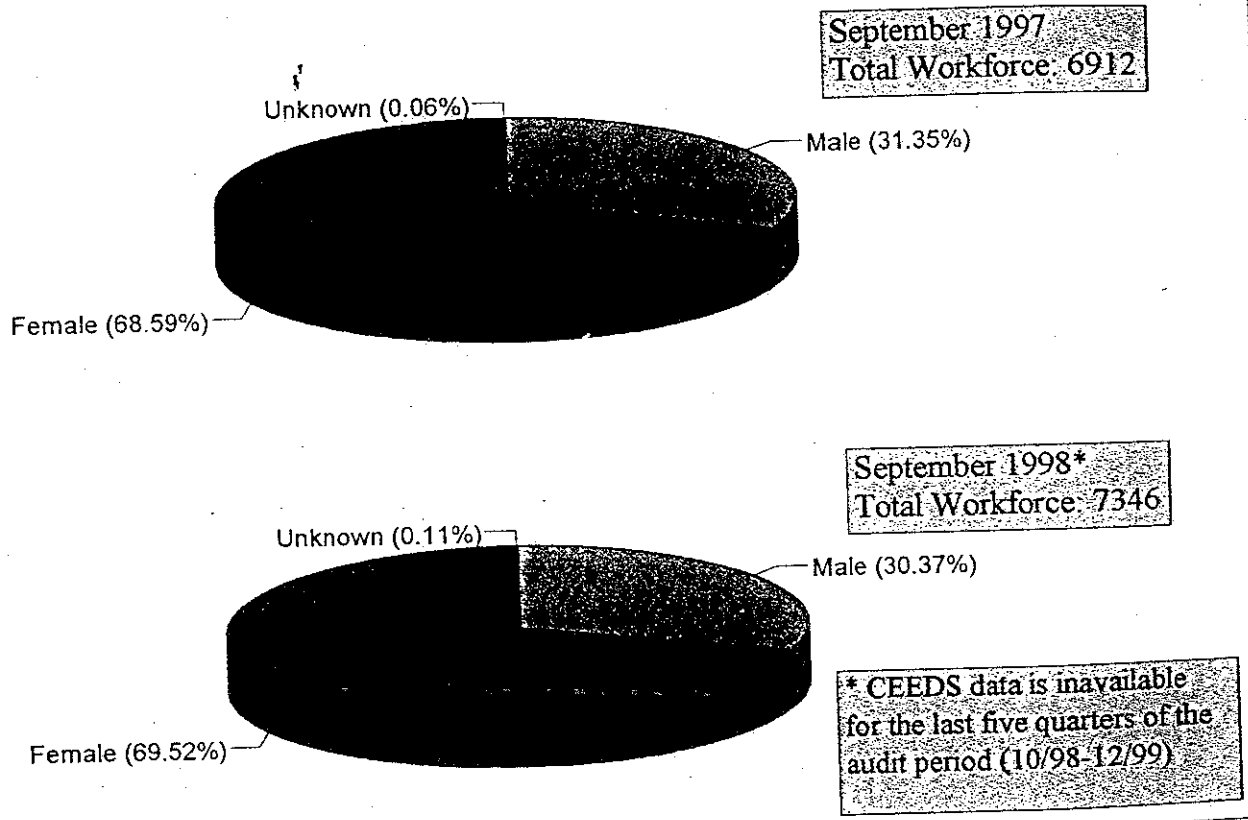
Yes: 11

No: 4

NA:

# Appendix - 3

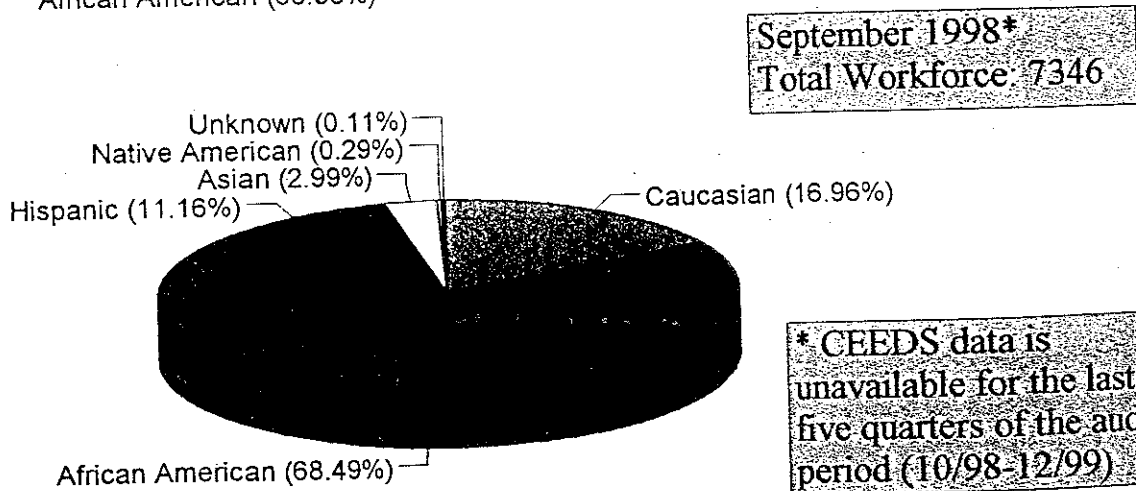
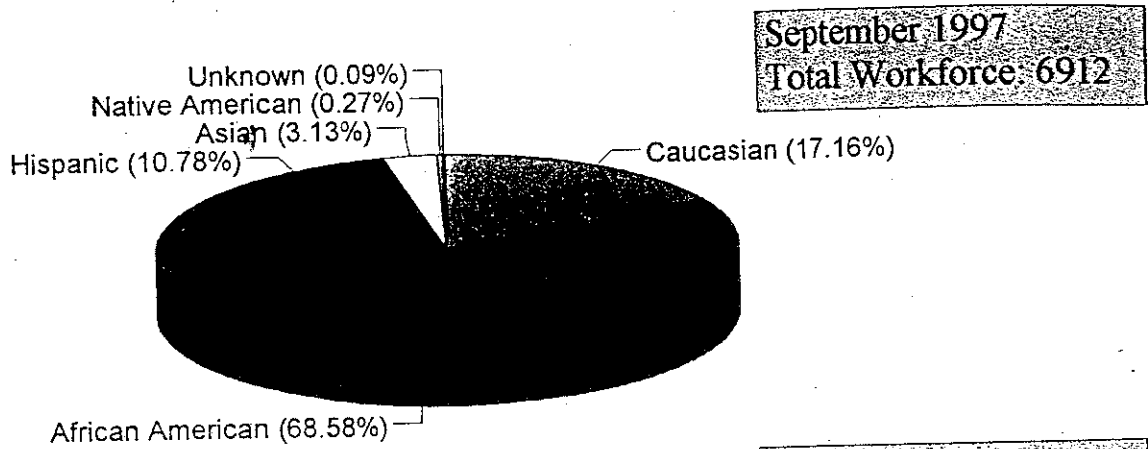
## ACS Workforce by Gender



Source: CEEDS Data (DCAS)

# Appendix - 4

## ACS Workforce by Ethnicity



Source: CEEDS Data (DCAS)

**Appendix - 5**  
**Administration for Children's Services**  
**Underutilizations During the Audit Period**  
**July 1, 1997 - September 30, 1998\***

EEO Job Group	Race/Sex	1Q/98	2Q/98	3Q/98	4Q/98	1Q/99
		9/97	12/97	3/98	6/98	9/98
010 Technic.	Hispanic Asian			X	X	X
012 Clerical Supvrs.	Hispanic	X	X	X	X	
020 Food Prep.	Hisp. Female	X X	X X	X X	X	X
022 Building Services	Hispanic			X	X	X
025 Craft	Black Female	X X	X X	X X	X X	X X
027 Transp.	Female	X	X	X	X	X
030 Teachers	Hispanic			X	X	X
031 Para Profs.	Hispanic	X	X	X	X	X

Source: CEEDS, NYC Department of Citywide Administrative Services

\*CEEDS data is unavailable for the last five quarters of the audit period (12/98-12/99)