



EQUAL EMPLOYMENT PRACTICES COMMISSION

SUMMARY COMPLIANCE REPORT

Agency: Financial Information Services Agency

Agency Head: Robert W. Townsend, Executive Director

EEO Officer: Glenis Patterson

Audit period: January 1, 2006 – December 31, 2007

Agency Census as of December 31, 2007: 32462

Preliminary Determination Letter:	<i>October 29, 2009</i>
Agency Response Letter:	<i>December 2, 2009</i>
Compliance Initiation Letter (FDL not necessary):	<i>January 15, 2010</i>
Compliance Initiated:	<i>March 2010</i>
Compliance Completed:	<i>August 2010</i>
Covering Months:	<i>March 2010 – August 2010</i>

Date: September 15, 2010

Pursuant to the findings and recommendations of the Equal Employment Practices Commission's (EEOC) Audit of Compliance by the Financial Information Services Agency (FISA) with the City's Equal Employment Opportunity Policy from January 1, 2006 through December 31, 2007, the EEOC initiated Audit Compliance with the FISA in March 2010. The FISA's final Monthly Compliance Report was submitted on September 9, 2010.

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

- 1. The agency head should sign each confidential report to indicate that it has been reviewed and whether the recommendation, if any, is approved and adopted. Such sign-off may be in written or electronic form. (Sect, VB, EEOC and DCPIG, sect. 12b)**

Because no discrimination complaint investigations have been completed during the compliance period, the agency head made a commitment to sign each confidential report to indicate that it has been reviewed and whether the recommendation, if any, is approved and adopted, in a memo dated May 26, 2010. A copy of the memo was provided with the agency's final Monthly Compliance Report.

The required action was accepted in August 2010.

- 2. Complaint files should contain thorough notes of words spoken and facts provided, excluding subjective assessment as close to verbatim as possible. (DCPIG, Sect. 12b)**

The hand written notes taken for EEO interviews conducted in May 2010 were also typed. A copy of the notes was provided in the agency's 3rd Monthly Compliance Report.

The required action was accepted in May 2010.

- 3. Since the EEOP requires that city agencies assess the manner in which candidates are selected for employment to determine whether there is any adverse impact upon any particular racial, ethnic, disability, or gender group, the FISA should conduct an adverse impact study. In cases where adverse impact is determined, the FISA should evaluate the validity and relevancy of its selection criteria and develop strategies to eliminate such impact. The FISA can use, and may modify, the DCAS/DCEEO's online internet based Disparate Impact Analysis application for this purpose. (Section IV, EEOP).**

The agency conducted an adverse impact study for promotions of the Computer Systems Manager positions in March 2010. No adverse impact was found. A copy of the study was provided with the agency's 1st Monthly Compliance Report February 23, 2009, .

The required action was accepted in March 2010.

- 4. It is the position of the DCAS ("Model Agency EEO Commitment Memo," http://extranet.dcas.nycnet/eep/pdf/model_memo.pdf) and the EEPC that at least twice a year during normal staff meetings, managers and supervisors should emphasize their commitment to the agency's EEO policies and affirm the right of each employee to file a discrimination complaint with the EEO office. Documentation should be maintained.**

On March 4, 2010, the agency head sent a memo electronically to FISA managers and supervisors directing them to emphasize their commitment to the EEO policies and affirm the right of each employee to file a discrimination complaint with the EEO office. On March 9, 2010, the EEO Officer sent an email to managers and supervisors addressing this same matter. Copies of emails from supervisors to the EEO Officer confirming that these meetings were held and that the EEO policy was discussed were provided with the agency's 1st report.

The required action was accepted in March 2010.

- 5. The agency head should disseminate an agency-wide memorandum informing staff about the changes that are being implemented in the FISA's EEO program pursuant to the audit and re-emphasizing the agency head's commitment to the agency's EEO program.**

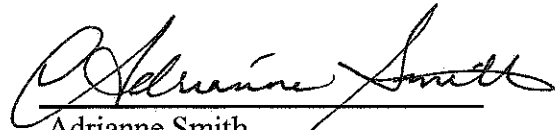
The agency head distributed an agency-wide memo informing staff about the changes that are being implemented in FISA's EEO Program. A copy of the memo was provided with the agency's Final Monthly Compliance Report. (Attached)

The required action was accepted in September 2010.

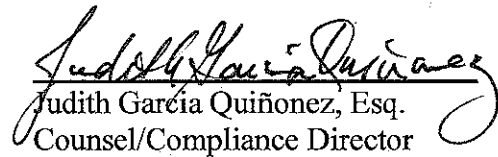
Recommendation

Based on the above information, we recommend that the Equal Employment Practices Commission issue a Letter of Completion of Compliance to Executive Director Robert Townsend informing him that the Financial Information Services Agency has implemented all of the recommended corrective actions to the Commission's satisfaction.

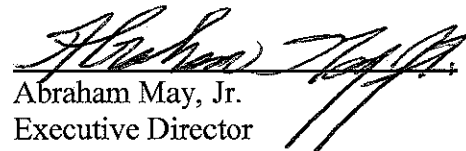
Respectfully Submitted,



Adrienne Smith
EEO Auditor/Compliance Officer



Judith García Quiñonez, Esq.
Counsel/Compliance Director



Abraham May, Jr.
Executive Director

Attachment