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BY MAIL AND EMAIL

Amy Loprest
Executive Director
Campaign Finance Board
100 Church Street, 12th Floor
New York, NY 10007

Re: Audit: Preliminary Determination: Review, Evaluation and Monitoring of the Campaign Finance Board's Employment Practices and Procedures from January 1, 2012 to December 31, 2014.

Dear Executive Director Loprest:

On behalf of the members of the Equal Employment Practices Commission (Commission or EEPC), 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 January 1, 2012 to December 31, 2014.

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 831(d)(2) 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 Campaign Finance Board, 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. 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 Equal Employment Opportunity Commission’s Instructions to Federal Agencies for EEO, Management Directive 715; 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. This Commission does not issue findings of discrimination pursuant to the New York City Human Rights Law.

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 analyses.) 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

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



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

Description of the Agency

The New York City Campaign Finance Board (CFB) administers the City's campaign finance systems. The CFB publishes detailed public information about money raised and spent in city elections by candidates and independent spenders, to bring transparency to the democratic process. (<http://www.nyccfb.info/about#sthash.uws2vEFZ.dpuf>, 2015)

The CFB currently has 71 employees. (See Appendix 2).

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 in 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 its EEO Policy statement on July 18, 2014. The policy statement reads "*The New York City Campaign Finance Board is an Equal Opportunity Employer committed to compliance with federal, state, and local laws prohibiting employment discrimination. Employment decisions will be made on the basis of merit and equality of opportunity and without unlawful discrimination.*" The Campaign Finance Board Equal Employment Opportunity Policy and Complaint Procedure was attached and included the name, phone number and email address of the agency's EEO Professionals.
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 distributed its EEO Policy entitled “*Campaign Finance Board Equal Employment Opportunity Policy and Complaint Procedure*” at each EEO training and new employee orientation during the period in review. The policy included sections on the following topics: sexual harassment, reasonable accommodation procedures, reasonable accommodation requests, and the procedure for complaints of discrimination (including when to complain about discrimination and what happens when a complaint is made). The policy also included contact information for the agency’s EEO professionals; an up-to-date list of protected classes under NYC and NYS Human Rights Laws; and current contact information for federal, state and local agencies that enforce laws against discrimination. The EEO Policy was also displayed in the common work areas.

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 reported that EEO training and new employee orientation sessions (which included an EEO policy module) was conducted by the principal EEO Professional on an as needed basis. The agency held several trainings entitled: *Orientation on EEO Policy and Procedures* and *CFB EEO Policy and Complaint Procedure* during each year of the audit period: six orientation sessions in 2012, three in 2013; and four in 2014. The agency also held four EEO trainings sessions in 2014. For the type and number of attendees at each session please refer to see Appendix 1.

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

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

4. Assess recruitment efforts to determine whether such efforts adversely impact any particular group. To the extent that adverse impact is discovered, at a minimum, identify

relevant professional and community organizations serving women, minorities, and other protected groups throughout the City, review and update listings of recruitment outreach sources, and contact these organizations when provisional positions become available or where the agency may otherwise use discretion in hiring.

- ✓ According to agency officials recruitment for open positions was conducted via job posts on its website as well as various external websites (such as Idealist, *Career Builder*, *Monster*, *City Limits*, *Orthodox Union Job Board*, *Glassdoor*, *Stack Overflow*, *Amsterdam News*, *El Diario*, *Korea Times*, *New York Times*, *Association of Local Government Auditors*, and the *American Institute of CPAs*); and through university career fairs. The agency reported significant diversity in the respondent pool when using these sources.
- 5. 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.
- ✓ The principal EEO Professional reviewed the agency's statistical information (i.e. workforce, hires, promotions, and separations by race/ethnicity and gender) (see Appendix 2).

NOTE: The agency reported that due to the small number of EEO complaints filed (2 external and 1 internal, all found to be unsubstantiated) it did not hold a formal review of the agency's annual number of EEO complaints.

- The principal EEO Professional, HR Professional, and General Counsel did not review the agency's employment practices, policies and programs on an annual basis to identify whether there were barriers to equal opportunity within the agency and determine what, if any, corrective actions are required to correct deficiencies. **Corrective action is required.**

Corrective Action 1: Ensure that the principal EEO Professional, HR Professional and General Counsel review 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 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.

- 6. 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. To the extent that adverse impact is discovered, determine whether the

selection criteria being utilized are job-related. Discontinue using criteria that are not job-related, and adopt methods which diminish adverse impact.

- ✓ The CFB's EEO workforce statistics (composition, hires, promotions, and separations) and utilization analysis were not available via CEEDS; therefore, the EEPC requested that the agency submit this information. The agency's statistics indicated that females represented 63% of its workforce. (See Appendix 3) The statistics also indicated hiring, and promotion rates were slightly greater for females and minorities during the period in review. (See Appendix 2)
- The agency did not provide documentation that it assessed the manner in which candidates are selected for employment, to determine whether there was any adverse impact upon any particular racial, ethnic, disability, or gender group. In addition, the agency's statistics indicated that minority group members comprised 22% of its workforce. (See Appendix 3) **Corrective action is required.**

Corrective Action 2: 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. To the extent that adverse impact is discovered, determine whether the selection criteria being utilized are job-related. Discontinue using criteria that are not job-related, and adopt methods which diminish adverse impact.

7. If women, minorities, or other protected groups are underrepresented in titles where there is discretion in hiring, advertise in minority- or female-oriented publications; contact organizations serving women, minorities, and other protected groups; participate in career fairs/open houses; or use internships to attract interested persons and to develop and hire interested and qualified candidates.

NOTE: the agency reported no underutilization of women, minorities, or other protected groups in discretionary titles. (see #6)

Corrective Action 3: If women, minorities, or other protected groups are underrepresented in titles where there is discretion in hiring, advertise in minority- or female-oriented publications; contact organizations serving women, minorities, and other protected groups; participate in career fairs/open houses; or use internships to attract interested persons and to develop and hire interested and qualified candidates.

8. If women, minorities, or other protected groups are underrepresented in *civil service* (list) titles, review the competencies, skills and abilities required (as presented in job vacancy notices and notices of examination) for available positions to ensure that these standards are updated, job-related and required by business necessity. (This includes working with DCAS or the Civil Service Commission if applicable). Then advertise in minority- or female-oriented publications, contact organizations serving women, minorities, and other protected groups; participate in career fairs or open houses; or use

internships to attract interested persons and to develop and hire interested and qualified candidates.

NOTE: the agency reported no underutilization of women, minorities, or other protected groups in civil service (list) titles. (see #6)

Corrective Action 4: If women, minorities, or other protected groups are underrepresented in *civil service* (list) titles, review the competencies, skills and abilities required (as presented in job vacancy notices and notices of examination) for available positions to ensure that these standards are updated, job-related and required by business necessity. (This includes working with DCAS or the Civil Service Commission if applicable). Then advertise in minority- or female-oriented publications, contact organizations serving women, minorities, and other protected groups; participate in career fairs or open houses; or use internships to attract interested persons and to develop and hire interested and qualified candidates.

9. Ensure that human resources professionals, managers, supervisors, and other personnel involved in the recruitment and hiring process are trained in EEO and interviewing, selection, and hiring skills to enable such individuals to correctly identify the most capable candidates (i.e. structured interview training or guide).
- The agency did not ensure that human resources professionals, managers, supervisors, and other personnel involved in the recruitment and hiring process were trained in EEO and interviewing, selection, and hiring skills to enable such individuals to correctly identify the most capable candidates. **Corrective action is required.**

Corrective Action 5: Ensure that human resources professionals, managers, supervisors, and other personnel involved in the recruitment and hiring process are trained in EEO and interviewing, selection, and hiring skills to enable such individuals to correctly identify the most capable candidates (i.e. structured interview training or guide).

10. Promote employees' awareness of opportunities for promotion and transfer within the agency, and ensure that employees are considered for such opportunities.
- ✓ The agency promoted employees' awareness of opportunities for promotion and transfer by ensuring that staff members were notified of opportunities for promotion and vacant positions via email as they became available.
11. At minimum, indicate the agency is an equal opportunity employer in recruitment literature.
- ✓ The agency advertised several vacant positions during the period in review including; *Auditor, Candidate Services Liaison, Senior Network Developer, Assistant Network*

Administrator, and Business Systems Analyst, each advertisement contained the EEO tagline "EOE".

12. 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.
- ✓ The agency's *Procedures for Job Searches* provided a means for tracking applicant resumes via Job Vacancy Notice Number, applicants'/ candidates' names, result (interviewed, selected or rejected). The agency also maintained an *EEO Interview Log* which included *Interview Date, (candidate/ applicant) Name, Gender, Ethnicity, Disability, Recruitment Source, (result) selected Y or N* and the reason for *Selection or Not Selection*.
- Although *EEO Interview Logs* were maintained; the agency reported that they were completed by the hiring manager. **Corrective action is required.**

Corrective Action 6: Ensure that the process of avoids the appearance of bias by delegating the responsibility for recording and maintaining an applicant/candidate 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.

13. 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.
- ✓ In 2014, the agency designated the Director of Human Resources and Administrative Services as Career Counselor.
- Subsequently, in 2015, the agency has not designated a professional with appropriate training, knowledge and familiarity with career opportunities in City government to provide career counseling to employees upon request. **Corrective action is required.**



**Equal Employment
Practices Commission**

Corrective Action 7: 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. Notify employees of the identity/type of guidance available from the Career Counselor at least once each year.

14. 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; 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.

✓ During the period in review the agency had two principal Human Resource Professionals: from April, 2008 to June 2014 the agency appointed the Chief of Administrative Services, as the principal Human Resources Professional; and from June 2014 to January 2015, the Director of Human Resources and Administrative Services was the agency's principal Human Resources Professional.

Subsequent to the audit period, on January 9, 2015 the agency appointed the Chief of Staff as the principal Human Resources Professional. The Chief of Staff is responsible for the maintenance of personnel files and *Personnel Actions Requests*; creating and implementing procedures, training programs and policies as needed; ensuring that all employees have access to information regarding benefits, staff development and training opportunities and are advised of the EEO policies, their rights and responsibilities under such policies and the discrimination complaint procedures; providing guidance and assistance to managers in compliance with HR best practices; and administering all staffing needs including on-boarding, transfers, and separations. The principal Human Resource Professional is also the agency's Disabilities Rights Coordinator, and provides support as needed to the principal EEO Professional and the agency head regarding policy and procedure methodology.

➤ The agency did not provide documentation that the principal EEO Professional was kept abreast of the number of 55-a program participants and efforts the agency has made to employ, promote or accommodate qualified individuals with disabilities.
Corrective action is required.

Corrective Action 8: Ensure that the principal EEO Professional is kept abreast of the number of 55-program participants and efforts the agency has made to employ, promote or accommodate qualified individuals with disabilities.

**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.

15. 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.
- ✓ During the period in review the agency updated its Employee Handbook to include the following statement *“Upon request to the EEO Officer, this Policy and Complaint Procedure and New York City’s EEO Policy will be made available in Braille, large print, audiocassette, or another format accessible to persons with disabilities.”* The agency reported there were no requests for an alternate format during the period in review.
16. Document reasonable accommodation requests and their outcomes.
- ✓ The agency reported no requests for accommodations were made during the period in review. The agency’s *Reasonable Accommodation Policy and Procedure for CFB Employees* stated *“all documentation and information concerning the medical condition or history of an employee requesting an accommodation must be collected on forms separate from other personnel-related forms and must be maintained by the DRC [Disability Rights Coordinator] in separate medical files.”*

VI. RESPONSIBILITY FOR EEO PLAN IMPLEMENTATION - EEO PROFESSIONALS:

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

17. 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 agency head announced the appointment of the principal EEO Professional via agency wide email on January 8, 2014. The principal EEO Professional completed Division of Citywide Diversity and Equal Employment Opportunity’s *Basic Training for EEO Representatives* in November 2014 and *FMLA and ADA Compliance* training in April 2015.
18. Ensure that EEO professionals are trained in EEO laws and procedures and know how to carry out their responsibilities under the EEO Policy.
- ✓ In addition to the principal EEO Professional, the agency appointed two EEO Counselors to receive and investigate EEO complaints and refer complainants to other sources of

assistance as necessary. Both EEO Counselors completed Division of Citywide Diversity and Equal Employment Opportunity *Basic Training for EEO Representatives*.

19. 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 principal EEO Professional reports directly to the agency head, this reporting relationship is reflected on the agency's organization chart.

20. 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 principal EEO Professional maintained documentation of emailed communications with the agency head. The principal EEO Professional collaborated with agency head to coordinate training sessions and to discuss potential EEO issue.

VII. RESPONSIBILITY FOR EEO PLAN IMPLEMENTATION – SUPERVISORS/MANAGERS:
Determination: The agency is in partial compliance with the standards for this subject area.

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

✓ During the period in review, performance evaluations were given at the 3 and 9-month point for new employees and annually beginning on the 1st anniversary of employment for all employees. The agency's Administrative Services unit sent performance evaluation forms, which included basic information such as name, start date, office and civil service title and evaluation period, to the supervisors in advance of evaluation commencement dates.

NOTE: In 2015, the agency implemented a schedule to conduct annual evaluations for all employees in March; this will enable the agency to track progress and ensure completion.

22. 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 provided copies of performance evaluations for executive staff members: Chief of Staff, General Counsel, Assistant Executive Director of Public Affairs and Assistant Executive Director of Campaign Finance Administration. These evaluation forms did not contain a rating for EEO responsibilities. **Corrective action is required.**

Corrective Action 9: 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.

23. 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.

- During the period in review the agency did not submitted Annual Plans of measures and programs to provide equal employment opportunity, or quarterly reports on efforts to implement those plans. **Corrective action is required.**

Corrective Action 10: 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.

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

1. 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 **10** 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*.

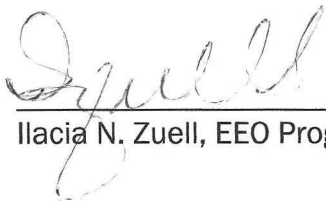
(Optional Conference) During the Optional Conference, we will discuss the immediate steps your agency should take and address questions regarding your agency's implementation of the prescribed corrective action(s).

(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,



Ilacia N. Zuell, EEO Program Analyst

Approved by,



Charise L. Terry, PHR
Executive Director

c: Winnie Ng-Chu, Principal EEO Professional

Appendix - 1

Campaign Finance Board

EEO TRAINING ACTIVITY
(January 2012 - December 2014)

Attachment: EEO Training Activity

Agency: 004

Please indicate EEO Training activities for the audit period (January 2012 to December 2014).

(NOTE: Mayoral agencies may omit this chart if this information has already been submitted to the EEPC via Quarterly EEO Reports.)

<u>Name of Training</u>	<u>Topic(s) Covered</u>	<u>Date(s)</u>	<u>Number of Participants</u>	<u>Type(s) and Number of Employees: check all that apply</u>
2012 Orientation Session on EEO Policy and Procedures	<ul style="list-style-type: none"> • Terms and conditions of employment • Protected classes • Harassment • Reasonable Accommodation • Retaliation • Complaint Procedure 	1/19/12 4/10/12 6/11/12 7/9/12 8/2/12 9/27/12	3 1 5 3 2 7	<input type="checkbox"/> Managers (____) <input checked="" type="checkbox"/> Supervisors (3) <input checked="" type="checkbox"/> Line Employees (14) <input checked="" type="checkbox"/> New Hires (all 21 listed) <input checked="" type="checkbox"/> Interns (4)
2013 Orientation Session on EEO Policy and Procedures	<ul style="list-style-type: none"> • Terms and conditions of employment • Protected classes • Harassment • Reasonable Accommodation • Retaliation • Complaint Procedure 	7/11/13 7/23/13 8/21/13	10 2 1	<input type="checkbox"/> Managers (____) <input checked="" type="checkbox"/> Supervisors (1) <input checked="" type="checkbox"/> Line Employees (7) <input checked="" type="checkbox"/> New Hires (all 13 listed) <input checked="" type="checkbox"/> Interns (5)
2014 Orientation Session on EEO Policy and Procedures	<ul style="list-style-type: none"> • Terms and conditions of employment • Protected classes • Harassment • Reasonable Accommodation • Retaliation • Complaint Procedure 	4/15/2014 6/10/14 6/17/14 7/18/2014	1 3 2 2	<input checked="" type="checkbox"/> Managers (3) <input checked="" type="checkbox"/> Supervisors (1) <input checked="" type="checkbox"/> Line Employees (3) <input checked="" type="checkbox"/> New Hires (all 8 listed) <input checked="" type="checkbox"/> Interns (1)
2014 CFB EEO Policy and Complaint Procedure Training	<ul style="list-style-type: none"> • Terms and conditions of employment • Protected classes • Harassment • Reasonable Accommodation • Retaliation • Complaint Procedure 	11/19/14 12/3/14 3/10/14 12/15/14	22 22 20 16	<input checked="" type="checkbox"/> Managers (9) <input checked="" type="checkbox"/> Supervisors (14) <input checked="" type="checkbox"/> Line Employees (57) <input checked="" type="checkbox"/> New Hires (10 of 80 listed)

Total # of Employees trained in the audit period: <u>122</u>			
Managers: <u>12</u>	Supervisors: <u>19</u>	Line Employees: <u>81</u>	Interns: <u>10</u>

(# of New Hires trained in the audit period: 52. Total Number of New Hires: 54)

No EEO training was conducted during the audit period. _____ (Initial)

Appendix - 2

Campaign Finance Board

Hires, Promotions and Separations by Ethnicity and Gender

(January 2012 - December 2014)

**DESCRIPTION OF
EQUAL EMPLOYMENT OPPORTUNITY
JOB GROUP CATEGORIES**

- 001 Administrators:** Occupations in which employees set broad policies and exercise overall responsibility for the execution of these policies. This category includes: Elected officials, commissioners, executive directors, deputy commissioners, chairpersons, general counsels, controllers, chiefs of department, inspector generals and kindred workers.
- 002 Managers:** Occupations in which employees direct individual departments or special phases of the agency's operations, or provide specialized consultation on a regional, district or area basis. This category includes: Assistant commissioners, deputy directors, assistant directors, project managers, special assistants, superintendents, deputy counsels and kindred workers.
- 003 Management Specialists:** Occupations which require specialized and theoretical knowledge of management, finance or personnel, which is usually acquired through college training or through work experience and other training which provides comparable knowledge. This category includes: Accountants, underwriters, financial analysts, personnel analysts, staff analysts, program analysts, buyers, purchasing specialists, inspectors, research analysts, program officers, project coordinators and kindred workers.
- 004 Science Professionals:** Occupations which require specialized and theoretical knowledge of various scientific or mathematical fields, which is usually acquired through college training or through work experience and other training which provides comparable knowledge. This category includes: Architects, engineers (chemical, nuclear, civil, electrical, industrial, mechanical, marine), computer specialists, telecommunications specialists, actuaries, statisticians, physicists, chemists, geologists, biologists, foresters and kindred workers.
- 005 Health Professionals:** Occupations which require specialized and theoretical knowledge of the medical or health fields, which is usually acquired through college training or through work experience and other training which provides comparable knowledge. This category includes: Physicians, dentists, veterinarians, optometrists, podiatrists, registered nurses, pharmacists, dieticians, occupational therapists, physical therapists, speech therapists, physician's assistants and kindred workers.
- 006 Social Scientists:** Occupations which require specialized and theoretical knowledge of the social sciences, which is usually acquired through college training or through work experience and other training which provides comparable knowledge. This category includes: Librarians, archivists, economists, psychologists, sociologists, urban planners and kindred workers.

007 Social Workers: Occupations which require specialized and theoretical knowledge of social work, youth and family counseling, addiction treatment and casework, which is usually acquired through college or training or through work experience and other training which provides comparable knowledge. This category includes: Caseworkers, probation officers, correctional counselors, juvenile counselors, addiction treatment counselors, eligibility specialists, human rights specialists, community liaison workers, clergy and kindred workers.

008 Lawyers: Occupations which require specialized and theoretical knowledge of the law and the judicial process, which is usually acquired through college training. This category includes: Attorneys, assistant district attorneys, counsels, assistant counsels, deputy counsels, law judges, and kindred workers.

009 Public Relations: Occupations which require special knowledge or skills in public relations, journalism, modern language or the fine arts, which are usually acquired through college training, specialized post-secondary school education, or work experience or training which provides comparable knowledge. This category includes: Technical writers, graphic designers, musicians, actors, directors, announcers, painters, illustrators, photographers, artists, editors, press officers, public relations specialists, public relations advisors, interpreters, customer service specialists and kindred workers.

010 Technicians: Occupations which require a combination of basic scientific or technical knowledge and manual skill which can be obtained through specialized post-secondary school education or through equivalent on-the-job training. This category includes: Health technicians (clinical laboratory, dental hygienists, health records, radiologic and licensed practical nurses), electrical and electronic technicians, engineering technicians (electrical, electronic, industrial, and mechanical), drafting occupations, surveying and mapping technicians, science technicians, airline pilots and navigators, air traffic controllers, broadcast equipment operators, computer programmers, legal assistants, investigators, and kindred workers.

011 Sales: Not applicable.

012 Clerical Supervisors: Occupations in which employees are responsible for overseeing and supervising the duties of clerical staff. This category includes: Chief clerks, supervising clerks, principal administrative associates, supervising cashiers, telegraph superintendents, supervising stenographers and kindred workers.

013 Clerical: Occupations in which employees are responsible for internal and external communication, recording and retrieval of data and/or information and other paperwork required in an office. This category includes: Cashiers, computer operators, word processors, secretaries, stenographers, typists, ticket agents, receptionists, clerks (information, personnel, file, library, records), bookkeepers, office machine operators, telephone operators, messengers, dispatchers, stock clerks, meter readers, office aides, general office clerks, bank tellers and kindred workers.

014 Household Services: Not applicable.

- 015 Police Supervisors:** Occupations in which uniformed employees with peace officers status set broad policies in the area of public safety and security, exercise overall responsibility for execution of policies, direct individual units or special phases of the agency's operations, or supervise on a regional, district or area basis. This category includes: Sergeants, captains, lieutenants, inspectors, captains (correction), wardens and kindred workers.
- 016 Fire Supervisors:** Occupations in which uniformed employees set broad policies in the area of public safety and protection; exercise overall responsibility for execution of policies; direct individual units or special phases of the agency's operations; or supervise on a regional, district or area basis. This category includes: Lieutenants, captains, battalion chiefs, deputy chiefs, supervising fire marshals, supervising fire prevention inspectors and kindred workers.
- 017 Firefighters:** Occupations in which uniformed employees are entrusted with public safety, security and protection from destructive forces. This category includes: Firefighters, marine engineers (uniformed), fire prevention inspectors, fire protection inspectors and kindred workers.
- 018 Police and Detectives:** Occupations in which uniformed employees with peace officer status are entrusted with public safety, security and protection. This category includes: Police officer, detectives, correction officers, bridge and tunnel officers, sheriffs, special officers, enforcement agents (traffic, sanitation) and kindred workers.
- 019 Guards:** Occupations in which employees are entrusted with public safety and security. This category includes: School crossing guards, housing guards, watch persons, lifeguards, park rangers, school guards and kindred workers.
- 020 Food Preparation:** Occupations in which employees are responsible for the preparation and distribution of food, or management of food services, in City facilities (e.g. schools, correctional institutions, and concessions). This category includes: Cooks, school lunch helpers, school lunch managers, food service managers, commissary managers and kindred workers.
- 021 Health Services:** Occupations in which employees are responsible for assisting health professionals in maintaining and promoting the health, hygiene and safety of the general public. This category includes: Dental assistants, dietary aides, public health assistants, nurse's aides, institutional aides, health aides, orderlies, and kindred workers.
- 022 Building Services:** Occupations in which employees perform duties which result in or contribute to the upkeep and care of buildings and facilities. This category includes: Custodians, cleaners, caretakers, maintainers, elevator operators and starters, exterminators, pest control aides and kindred workers.
- 023 Personal Services:** Occupations in which employees perform duties which result in or contribute to the comfort or convenience of the general public. This category includes: Housekeepers, barbers, attendants, railroad porters, homemakers, matrons and kindred workers.

- 024 Farming:** Occupations in which employees perform duties which result in or contribute to the upkeep and care of agricultural/botanical/zoological facilities or grounds of public property. This category includes: Herbarium aides, aquarium technicians, botanical gardening aides, gardeners, groundskeepers, pruners, hostlers, menagerie keepers, horseshoers and kindred workers.
- 025 Craft:** Occupations in which employees perform duties which require special manual skill and a thorough and comprehensive knowledge of the processes involved in the work in which is acquired through on-the-job training and experience or through apprenticeship or other formal training programs. This category includes: Mechanics, equipment repairers, telephone line installers, small instrument repairers, brick masons, carpenters, electricians, plumbers, mining occupations, tool and die makers, sheet metal workers, tailors, butchers, bakers, machine operators, locksmiths, precision handworking occupations and kindred workers.
- 026 Operators:** Occupations in which employees perform duties which require specialized machine skills which are required through on-the-job training and experience or through apprenticeship or other formal training programs. This category includes: Printing press operators, high pressure boiler operators, laundry workers and kindred workers.
- 027 Transportation:** Occupations in which employees perform duties which require motor vehicle, bus, train, or other transportation operation skills which are acquired through on-the-job training and experience or through other formal training programs. This category includes: Bus drivers, chauffeurs, motor vehicle operators, trainmasters, ferry terminal supervisors and kindred workers.
- 028 Laborers:** Occupations in which employees perform duties which result in or contribute to the comfort, convenience, hygiene or safety of the general public, or which contribute to the upkeep and care of buildings and facilities. There are no job qualification requirements for titles in this category. This category includes: Skilled craft helpers and apprentices, construction laborers, stock handlers, garage and service station related occupations, car cleaners, seasonal park helpers, track workers, assistant highway repairers and kindred workers.
- 029 Sanitation Workers:** Occupations in which employees perform duties which result in or contribute to the cleanliness, hygiene and safety of the public domain. Qualification requirements, which include civil service examinations, exist for titles in this category. This category includes: Sanitation workers, debris removers and kindred workers.
- 030 Teachers:** Occupations which require specialized and theoretical knowledge of education and instructional methods, which is usually acquired through college training or through work experience and other training which provides comparable knowledge. This category includes: Teachers, instructors, professors, lecturers, fitness instructors, graduate assistants, fellows, adjunct professors, substitute teachers, trade instructors, education/ vocational counselors, education analysts, education officers, institutional instructors and kindred workers.

031 Paraprofessionals: Occupations in which employees perform some of the duties of a professional or technician in a supportive role, which usually requires less formal training and/or experience normally required for professional or technical status. Such positions may fall within an identified pattern of staff development and promotion. This category includes: Administrative assistants, project associates, coordinators, community associates and assistants, community service aides, research associates, welfare service workers, child care workers and kindred workers.

Summary of Hires

Agency: NYC Campaign Finance Board (004)

Indicate the number of HIRES in each EEO Job Group by ethnicity and gender.

EEO Job Group #	Total Hires within Job Group	Race/Ethnicity						Gender	
		Asian	Black	Hispanic	Native American	White	Unknown	Male	Female
<u>001</u>	<u>3</u>	<u>1</u>	<u>1</u>	_____	_____	<u>1</u>	_____	<u>2</u>	<u>1</u>
<u>002</u>	<u>3</u>	<u>1</u>	_____	_____	_____	<u>2</u>	_____	<u>3</u>	<u>0</u>
<u>003</u>	<u>3</u>	<u>1</u>	<u>2</u>	_____	_____	_____	_____	<u>2</u>	<u>1</u>
<u>006</u>	<u>1</u>	_____	_____	_____	_____	<u>1</u>	_____	<u>0</u>	<u>1</u>
<u>008</u>	<u>3</u>	<u>1</u>	_____	<u>1</u>	_____	<u>1</u>	_____	<u>1</u>	<u>2</u>
<u>009</u>	<u>4</u>	_____	<u>1</u>	_____	_____	<u>3</u>	_____	<u>1</u>	<u>3</u>
<u>010</u>	<u>24</u>	<u>4</u>	<u>4</u>	<u>4</u>	_____	<u>12</u>	_____	<u>10</u>	<u>14</u>
<u>013</u>	<u>1</u>	_____	<u>1</u>	_____	_____	_____	_____	<u>1</u>	<u>0</u>
<u>031</u>	<u>2</u>	<u>1</u>	_____	_____	_____	<u>1</u>	_____	<u>1</u>	<u>1</u>
_____	_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____	_____

There were no hires during the period in review. _____ (Initial)

Summary of Promotions
Agency: NYC Campaign Finance Board (004)

Indicate the number of PROMOTIONS in each EEO Job Group by ethnicity and gender.

EEO Job Group #	Total Promotions within Job Group	Race/Ethnicity						Gender	
		Asian	Black	Hispanic	Native American	White	Unknown	Male	Female
001	3	_____	_____	_____	_____	3	_____	2	1
003	7	1	1	2	_____	3	_____	3	4
009	2	1	_____	_____	_____	1	_____	1	1
010	2	1	1	_____	_____	_____	_____	1	1
013	1	_____	1	_____	_____	_____	_____	0	1
031	1	_____	1	_____	_____	_____	_____	1	0
_____	_____	_____	_____	_____	_____	_____	_____	_____	0
_____	_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____	_____

There were no promotions during the period in review. _____ (Initial)

Summary of Separations
 Agency: NYC Campaign Finance Board (004)

Indicate the number of SEPARATIONS due to layoffs or firings:

EEO Job Group # or Civil Service Title	Total Employees within Job Group	Total Terminated by		Race/Ethnicity						Gender	
		Firing	Layoff	Asian	Black	Hispanic	Native American	White	Unknown	Male	Female
001	4	0	0	_____	1	_____	_____	3	_____	1	3
002	3	0	0	_____	1	_____	_____	2	_____	2	1
003	5	0	0	3	_____	1	_____	1	_____	3	2
008	3	0	0	1	_____	_____	_____	2	_____	2	1
009	3	0	0	1	1	_____	_____	1	_____	1	2
010	15	1	0	1	2	3	_____	9	_____	6	9
013	2	1	0	_____	2	_____	_____	_____	_____	1	1
031	1	0	0	_____	_____	_____	_____	1	_____	1	0
_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____

There were no separations the period in review. _____ (Initial)

Appendix - 3
Campaign Finance Board

Workforce Composition
(at the end of the audit period)

Statistical Profile of Agency Workforce
Campaign Finance Board

Number of Employees End of Audit Period
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Male	<u>26</u>
Female	<u>45</u>

White	<u>41</u>
Black	<u>7</u>
Hispanic	<u>4</u>
Asian	<u>4</u>
Native American	<u>0</u>
Unknown	<u>15</u>

Total # of Employees	<u>71</u>
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