

EMPLOYMENT PRACTICES COMMISSION

City of New York

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July 28, 2011

Marc E. Jahr President New York City Housing Development Corporation 110 Williams Street New York, New York 10038

Re: Resolution #11/07-HDC/ Preliminary Determination Pursuant to the Audit of Compliance by the New York City's Housing Development Corporation with its Equal Employment Opportunity Policy from January 1, 2007 to December 31, 2009.

Dear President Jahr:

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).)

The Charter defines 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 New York City's Housing Development Corporation (HDC) consists of four city officers, two appointed by the Mayor, and two appointed by the Governor.

This Commission is empowered by Section 831 of the City Charter to recommend all necessary and appropriate actions to ensure fair and effective affirmative employment programs for minority group members, women and other protected classes. This audit measures the HDC's compliance with its Equal Employment Opportunity Policy, as well as Commission policies and EEO standards expressed in the Federal, State and City Human Rights Laws. All

recommendations for corrective actions are consistent with both the audit's findings and the parameters set forth in the HDC's Equal Employment Opportunity (EEO) Policy and Discrimination Complaint Procedure.

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

Scope and Methodology

Audit methodology included an analysis of the agency's responses to an *EEPC Document* and Information Request Form. The EEPC sent interview questionnaires to the agency's EEO Officer/Vice-President of Human Resources, General Counsel, and two EEO Counselors. The EEPC Senior Auditor also had a follow-up discussion of audit findings with the EEO Officer.

In addition, the EEPC's Executive Director sent links to the *EEPC's Employee Survey* and *EEPC's Supervisor/Manager Survey* for the President's distribution to his employees. The *EEPC's Employee Survey* was distributed to 162 individuals; 135 (83%) responded. The *EEPC's Supervisor/Manager Survey* was distributed to 32 supervisors/managers; 31 (97%) responded. Survey findings are included as appendices.

Description of the Agency

The HDC is a corporate governmental agency constituted as a public benefit corporation and established in 1971 under Article XII, Private Housing Finance Law. The HDC encourages the investment of private capital through low-interest mortgage loans and provides safe and sanitary dwellings for families and persons whose housing needs cannot be met by unassisted private enterprise. Through the issuance of bonds and notes, the HDC provides construction and/or permanent financing for multifamily residential housing.

Personnel Activity during the Audit Period

According to workforce data provided by the agency, during the audit period 121 people applied for jobs with the agency: 18 African-Americans, 18 Asian/Pacific Islanders, 70 Caucasians, and 15 Hispanics. Of those that applied, 64 were female. Fifty-six people were hired: 15 African-Americans, 4 Asian/Pacific Islanders, 33 Caucasians, and 4 Hispanics. Of those hired, 33 were female. Twenty-six people were promoted during the period in review: 4 African-Americans, 3 Asian/Pacific Islanders, 17 Caucasians, and 2 Hispanics. Of those promoted, 12 were female. (Appendix 4) Seven employees (1 African-American, 5 Caucasians, and 1 Hispanic) separated involuntarily during the period in review; 2 of these were female.

During the period in review, the total number of employees increased from 135 to 159. The number of African-American employees increased from 31 to 42, Asian/Pacific Islander employees increased from 26 to 30, Caucasian employees increased from 58 to 65, and Hispanic employees increased from 20 to 22. Female employees increased from 88 to 103. (Appendices 2 and 3) Currently the agency has a total of 162 employees.

Discrimination Complaint Activity during the Audit Period

The agency reports that one internal discrimination complaint, which received a no probable cause determination, was filed during the audit period alleging discrimination on the basis of hostile work environment. At the time of this audit, no internal discrimination complaints were still pending. The agency reports three external discrimination complaints. (Appendix 6)

Legal Issues

The agency reports that there were no EEO judgments/settlements during the audit period and the two years prior. At the end of the audit period, there were three pending EEO lawsuits. Two were based on National Origin and one was based on Age/Disability.

PRELIMINARY DETERMINATION

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

EEO Policy and Statement

The HDC is in compliance with the following requirements:

- 1. The agency head issued a general EEO Policy Statement that was distributed to all employees via email. In addition, 94% of respondents to the *EEPC's Supervisor/Manager Survey* indicated that they had received a copy of the agency's EEO Policy Statement.
- 2. The agency's EEO Policy (which includes the Discrimination Complaint Procedure, Reasonable Accommodation Policy and Procedure, and a section on sexual harassment) was distributed at new-hire orientation. In addition, 91% of respondents to the EEPC's Supervisor/Manager Survey indicated it could be found in the agency's HR/Personnel Office and 85% indicated it could be found on the Intranet. Ninety-nine percent indicated the City's EEO Policy was posted on the agency's bulletin boards or kept in an area accessible to employees.
- 3. The agency distributed the EEO Policy Handbook, "About EEO: What You May Not Know" to its employees. The handbook is also included in the new hire package. In addition, 88% of respondents to the EEPC's Employee Survey indicated they were given a copy of the EEO Policy Handbook.

The HDC is in partial compliance with the following requirement:

The agency's EEO Policy did not have contact information for federal, state, and local agencies that enforce laws against discrimination. <u>Corrective action is required.</u>

Recommendation: 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)

EEO Training Standards

The HDC is in compliance with the following requirement:

During new employee orientation, the agency ensured that new employees were advised of the EEO policies, the employees' rights and responsibilities under such policies, and the discrimination complaint procedure. A consultant, who was recommended by the DCAS, provided EEO training to employees in April 2008. The EEO training curriculum included: the HDC's (and the City's) EEO policies; federal, state and local EEO laws, preventing sexual harassment, personal liability/workplace decisions, and managerial case studies. In addition, 98% of respondents to the EEPC's Employee Survey indicated they had received EEO training during the past 3 years; 96% of respondents also found this training to be "very" or "somewhat" informative.

Discrimination Complaint and Investigation Procedures

The HDC is in compliance with the following requirement:

The agency has established an internal complaint investigation procedure by which the EEO Officer investigates discrimination complaints. In addition, 69% of respondents to the *EEPC's Employee Survey* indicated they know how to file an EEO complaint.

The HDC is not in compliance with the following requirements:

1. The EEO Officer did not submit the written investigative report including recommendation to the agency head for review. <u>Corrective action is required</u>.

<u>Recommendation:</u> 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)

2. The EEO Officer did not inform all parties in writing of the outcome of the investigation. Corrective action is required.

<u>Recommendation:</u> 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*)

Selection and Recruitment System

The HDC is in compliance with the following requirements:

1. When advertising, the agency indicates it is an Equal Opportunity Employer. The last seven internal job vacancy notices: Associate General Counsel, Staff Accountant, Internal Auditor, Insurance Administrator; Investment Analyst, Asset Manager, Assistant General Counsel, Project Manager; Cash and Investment Analyst; Cash Management Assistant, Senior Vice President for Debt Issuance and Finance, Credit Analyst, Staff Accountant; Asset Manager for Data Integrity, Oracle Applications OBIEE; Loan Servicing Manager, Engineer; and Asset Manager, Assistant General Counsel, Project Manager included this indication.

In addition, the last five advertisements during the period in review -- Oracle Applications OBIEE Developer, Cash Management Analyst, Staff Accountant, Senior Internal Auditor, and Loan Servicing -- published via *New York Times* indicated that the agency is an Equal Opportunity Employer.

- 2. Eighty-three percent of respondents to the *EEPC's Supervisor/Manager Survey* indicated they interviewed candidates for positions; 96% of these respondents also indicated they had received training and/or a guide that outlines illegal or discriminatory questions and includes instructions for conducting a structured interview.
- 3. The agency evaluates its employees annually.

EEO Professionals' Responsibilities/Reporting Arrangement

The HDC is in compliance with the following requirements:

- 1. The agency's EEO Officer is also the Vice-President of Human Resources and oversees activities that impact EEO within the agency such as selection, recruitment, and reasonable accommodations. The agency uses panel interviews of 2-5 persons.
- 2. The agency identified its EEO personnel in its EEO Policy. Employees received updates via email whenever there was a change in EEO staff. In addition, 88% of respondents to the EEPC's Employee Survey and 84% of respondents to the EEPC's Supervisor/Manager Survey indicated that they knew who the agency's EEO Officer is. During the audit period, EEO Personnel held meetings to discuss EEO-related issues.
- 3. The agency's organization chart indicates the EEO Officer's reporting relationship with the Executive Vice-President of Real estate/External Affairs who is a direct report to the agency head. Documentation of meetings between the EEO Officer and this person was kept.
- 4. The EEO Officer supervised the EEO-related activities of the EEO Counselors or other EEO personnel.
- 5. During the audit period, a person of each gender was available to investigate discrimination complaints.

The HDC is in partial compliance with the following requirement:

Although the EEO professionals had some training (EEO The Public Sector Perspective course from the Cornell Institute of Labor Relations' EEO Studies Program, online training in hiring/firing employees lawfully and onsite training for preventing harassment in the workplace), they did not demonstrate that they received EEO professionals training which included discrimination complaint intake and investigation. Corrective action is required.

Recommendation: 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)

EEO and Reasonable Accommodation for Persons with Disabilities

The HDC is in compliance with the following requirements:

- 1. The HDC includes a Reasonable Accommodation Procedure in its EEO Policy. During the period in review, the agency provided 3 reasonable accommodations for part-time/flexible work schedule.
- 2. The agency appointed its EEO Officer as Disability Rights Coordinator responsible for handling reasonable accommodation requests and ensuring compliance with all federal, state, and local laws, as well as City and agency policies, pertaining to persons with disabilities.
- 3. In response to this audit, the HDC completed the EEPC's checklists for determining accessibility. The location (110 William Street) was accessible to and usable by persons with disabilities (e.g. facilities contain street accessible entrances, ramp access, wheelchair accessible elevators, bell and Braille in elevators, wide restroom stalls, grab bars in restroom, and low sink or bathroom fixtures).
- 4. The agency is committed to having alternative formats (such as large print, audio tape, and/or Braille) available upon request for use by persons with disabilities.

SUMMARY OF RECOMMENDED CORRECTIVE ACTIONS

- 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)
- 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)

- 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*)
- 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)

In addition to the above recommendations, during the compliance process, the Commission requires that the agency 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.

Conclusion

Pursuant to Chapter 36 of the New York City Charter and the previously cited preliminary determinations relating to EEPC's audit of the HDC's compliance with its Equal Employment Opportunity Policy, as well as Commission policies and EEO standards expressed in the Citywide EEO Policy, we respectfully request your response to the aforementioned preliminary determinations.

Your response should indicate what corrective actions your office will take to bring the agency in compliance with the aforementioned policies and which recommendations it intends to follow. As your staff informed us during the exit meeting, you have already implemented some of our recommended corrective actions. Please specify these corrective actions in your response, and include any documentation as addenda to your formal response to the Preliminary Determination.

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

Cesar A. Perez, Esq.

Chair

My Surveys

Address Book

My Account

Plans & Pricing

+ Create Surv

Housing Development Corporation -Agency EEO Program Edit

Default Report + Add Report

Response Summary

Total Started Survey: 138 Total Completed Survey: 135 (97.8%)

Select a page to view below or view all pages:

#1. EMPLOYEE SURVEY

PAGE: EMPLOYEE SURVEY

1. City of New York

Agency Name: Show Responses

Download

Response Percent Response Count

answered question

138

138

skipped question

0

Select a page to view below or view all pages:

100.0%

#1. EMPLOYEE SURVEY

»

Housing Development Corporation - Agency EEO SurveyMonkey Program

1. City of New York			-		•
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Agency Nar	ne:		16	0.0%	138
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			skipped que	stion	0
2. Equal Employment Opfull and equal consideration you agree with this prince	itioi	rtunity (EEO) guarantees the right of all pe n on the basis of merit, regardless of prote e?	ersons to b	oe acc up sta	orded tus. Do
			5	onse cent	Response Count
	/es		9	7.8%	132
	No			2.2%	3
		ar	swered que	stion	135
			skipped que	stion	3
3. Do you know who you	ir aç	jency's EEO Officer Is?	Resp	onse	Response
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	No	Addition of	1	1.6%	16
		an	iswered que	stion	138
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4. Is the EEO Policy posted on your agency's bulletin boards or kept in an area otherwise accessible to employees?

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5. Were you given a Know?	copy of	the EEO Policy Handbook - About EEO: Wh	at You May No	
			Response Percent	Response Count
	Yes		87.6%	120
	No		12.4%	. 17
		ans	swered question	137
		S	kipped question	i
6. Do you believe yo employment includi	our agen ing hiring	cy practices EEO (i.e. ensures fairness in g, selection, promotions, etc.)?	all aspects of	
			Response Percent	Response Count
rapina undangs, ing undagen apida , ta saaka surunnaa han eensiinka sukunta ja	Yes		83.8%	114
gang tang sebagai dan kebanggan dan kebangga	No		16.2%	22
and the grade of the second		an:	swered question	136
		s	kipped question	. 2

7. How often has your manager or supervisor reaffirmed the agency's commitment to the principle of EEO during staff meetings within the past year?

One time At no time 29.6% 40					Response	Response
One time At no time 29.6% 40 answered question 135		•			Percent	Count
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	- -	At no time			29.6%	40
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			ager or supervisor	。 1947年(1967年) 1967年 -		

8. How often has your manager or supervisor discussed employees' right to file a discrimination complaint with the agency's EEO Officer during staff meetings within the past year?

	Response Percent	のこのは、他はない。これは、これでは、これでは、これでは、これでは、これでは、これでは、これでは、こ
Two or more times	12.6%	17
One time	34.8%	47
At no time	52.6%	71
answere	d question	135
skippe	d question	3

9. When hired, were you advised of the EEO policies, and of your rights and responsibilities under such policies?

	Response Percent	Response Count
Yes	61.5%	83
No	4.4%	6
Do Not Remember	34.1%	46
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	skipped question	3
10. Do you know how to file	an EEO complaint?	
	Response Percent	Response Count
Yes	68.9%	93
No.	31.1%	42
	answered question	135
	skipped question	3
11. If you had an EEO comp	laint, would you bring it to your agency's EEO Office?	
gegenerate and the season of the season o	Response Percent	Response Count
Yes	64.4%	87
No	T1.1%	15
Undecided	24.4%	33
	answered question	135
	skipped question	3

12. Would you prefer to file an EEO complaint with an office outside your agency rather than your agency's EEO Office?

13. During the past 3 years, did you file a complaint with your agency's EE Yes No answere	Percent 28.9% 43.0% 28.1% ed question O Office? Response Percent 0.7%	Count 39 58 38 135 3 Response Count
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answere skippe	99.3%	12/
skippe		134
	ed question	135
14. Was your manager or supervisor supportive of your right to file a com	ed question	3
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	plaint?	
	Response Percent	Response Count
Yes	0.0%	0
**************************************	0.0%	0
Not Applicable	100.0%	nga sa san sa namang nama 1
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skippe	4-00000	•

15. During the past 3 years, did you receive EEO training?

	Response Percent	Response Count
Yes	97.8%	132
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Employed for less than 12 months	2.2%	3
enteremble alle i heropami nega orinari i heropami nega orinari.	answered question	135
	skipped question	3
16. How informative was th	is training?	
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16. How informative was th Very informative Somewhat informative	Response Percent	Count 95
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Very informative Somewhat informative	Response	Gount 95 32
Very informative Somewhat informative Not really informative	Response	Response Count 95 32 3 132

17. Does your agency use training and development programs in order to improve job performance and/or career opportunities?

	Response Percent	Response Count
Yes	85.2%	115
No September 1987 - Production of the Control of th	5.2%	Z
I do not know	9.6%	13
ADSWETS	dquestion	135
skipper	l question	3

18. Were vacant positions advertised on bulletin boards or other areas accessible to employees in a timely manner?

	Response F Percent	Count
Yes	61.5%	83
No	15.6%	21
Do not remember	23.0%	31
answered	d question	135
skipped	d question	''' 3

19. The Personnel Rules and Regulations of the City of New York and the Guidelines for Evaluating Managerial Performance in NYC Agencies require that employees (managerial and non-managerial) receive annual performance evaluations. Have you received annual performance evaluations within the past 3 years?

		Response Response Percent Count
Yes		90.4% 122
No No		4.4% 6
Employed for less than 12 months		5.2% 7
	ans	wered question 135
	sk	ipped question 3

20. Did your evaluation contain recommendations for improving your job performance?

	Response Percent	Response Count
Yes	94.3%	115
No.	5.7%	7
answer	ed question	122
A STATE OF THE PROPERTY OF THE	ed question	16

21. Did your evaluation contain recommendations for career advancement with your agency?

	Response Percent	Response Count
Yes	49.2%	60
No	50.8%	62
	answered question	122
٠	skipped question	16

22. The Career Counselor is a trained professional (often the Human Resources Director) familiar with civil service and provisional jobs who provides career counseling to employees who request such guidance. Do you know who your agency's Career Counselor is?

		Response Response Percent Count
Yes		40.0% 54
No No	September 20 of the proof of the control of the con	44.4% 60
Not Applicable		15.6% 21
the control of the complete the control of the cont		answered question 135
		skipped question 3

23. The Disability Rights Coordinator is responsible for handling reasonable accommodation requests and ensuring compliance with all federal, state, and local laws, as well as City and agency policies pertaining to persons with disabilities. Do you know who your agency's Disability Rights Coordinator is?

	Response F Percent	Response Count
Yes Employee	48.9%	66
No	51.1%	69
	answered question	135
Administration and controlled on the specimen which we committed that the specimen of the spec	skipped question	3

24. Agencies are required to take appropriate action to reasonably accommodate qualified employees and applicants with disabilities, and those who are victims of domestic violence, sex offenses, or stalking, to enable to them to perform their jobs or enjoy equal benefits and privileges of employment. Agencies are also required to provide reasonable accommodations for the religious observances, beliefs and practices of an employee or applicant. During the past 3 years, did you ask for a reasonable accommodation due to any of the above?

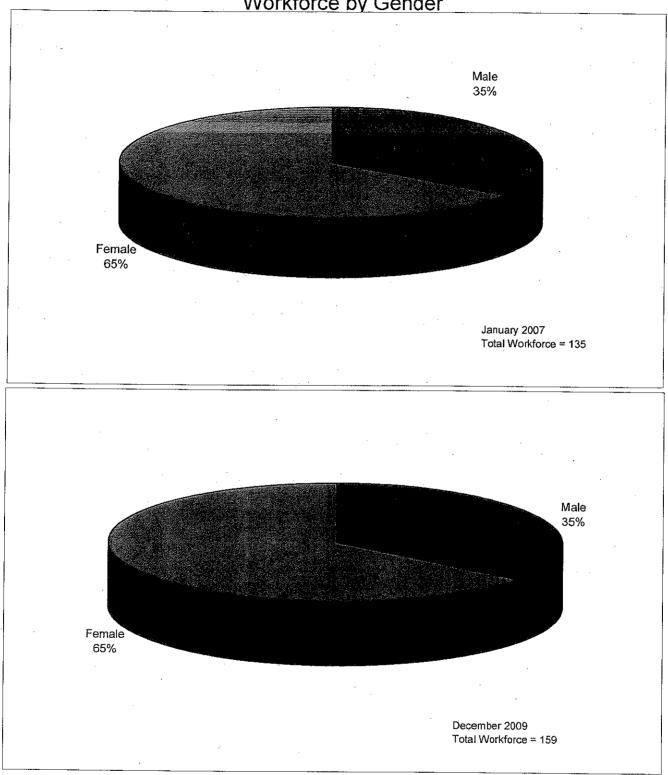
						Response Percent	Response Count
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	No				No. of the Control of	91.9%	124
					answe	ered question	135
	Carlos Ca				skip	ped question	3
25. Was your accom	modati	on grante	d?			Response	· · · · · · · · · · · · · · · · · · ·
	Yes					Percent 100.0%	Count 11
	No					0.0%	n handender in en men men de de de la companion de la companio
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26. Race/Ethnicity

	Response Percent	Response Count
Asian or Pacific Islander	19.8%	23
American Indian or Alaska Native	0.0%	O
Black (not of Hispanic origin)	18.1%	21
о чене в по постории повые повые повые почене по выс ченей на на ченей выпера. Hispanic	13.8%	16
White (not of Hispanic origin)	41.4%	48
Other	6.9%	8
	answered question	116
	skipped question	22
27. Gender		
	Response Percent	Response : Count
) Male	33.3%	40
Female	66.7%	80
	answered question	120
ন্ত্ৰ হৈ প্ৰথম কৰা বিশ্বস্থা কৰা কৰা কৰা কৰা কৰা কৰা কৰা কৰা কৰা কৰ	skipped question	18

Appendix - 2

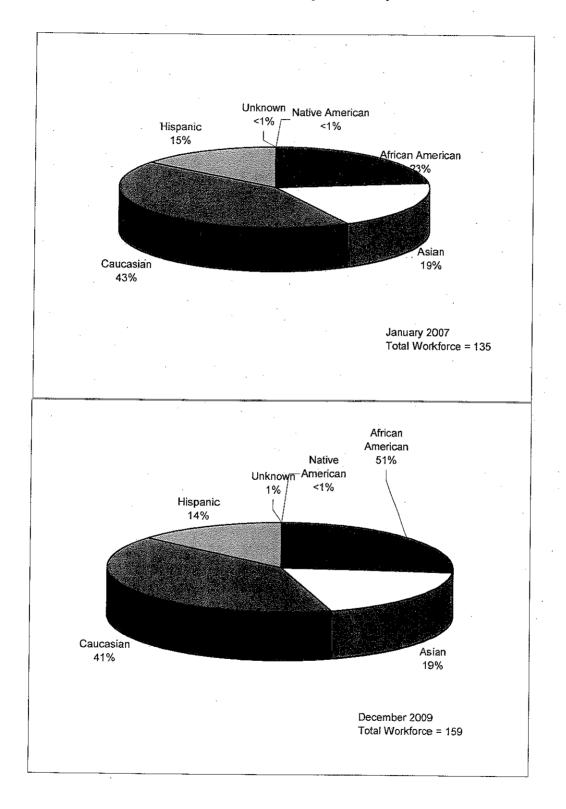
New York City Housing Development Corporation
Workforce by Gender



Source: NYCHDC

Appendix - 3

New York City Housing Development Corporation Workforce by Ethnicity



APPENDIX - 4

The following table indicates personnel activity during the audit period, January 1, 2007 to December 31, 2009

New York City Housing Development Corporation

Hires by Gender and Ethnicity

Total Hires: 56

,	Male	Female	Total	Caucasian	African American	Hispanic	Asian	Total	
	23	33	56	33	15	4	4 .	56	-

Promotions by Gender and Ethnicity

Total Promotions: 26

Male	Female	Total	Caucasian	African American	Hispanic	Asian	Total
14	12	26	17	4	2	3	26

Separations by Gender and Ethnicity

Total Separations: 7

Male	Female	Total	Caucasian	African American	Hispanic	Total
5	2	7	5	1	1	7

Source: Audit data supplied by NYCHDC

SurvPilot4Us Sign Out + Create Surv Plans & Pricing My Surveys Address Book My Account Supervisor/Manager Survey: Housing Development Corporation Edit Default Report + Add Report Total Started Survey: 35 Total Completed Survey: 31 (88.6%) Response Summary Select a page to view below or viewall pages: « #1. PAGE: 1 Download 1. City of New York Response Count Response Percent Agency: Show Responses 100.0% 34 answered question 34 skipped question Select a page to view below or view all pages: « #1.

Supervisor/Manager Survey: Housing

SurveyMonkey

skipped question

Development Corporation

the state of the s		
1. City of New York		
The state of the s	Response	Response
	Percent	Count
THE RESERVE ASSETS AND A CONTRACT OF THE RESERVE ASSETS AS A SECOND OF THE RESERVE AS A SECOND OF THE		
Agency:	100.0%	34
		entreprise de la principa del la principa de la principa del la principa de la principa del la principa de la p
	answered question	34
	skipped question	1
2. Which of the following ar	e you?	
	Response	Response
	Percent	Response Count
Supervisor	48.6%	17
Manager	51.4%	18
	answered question	35
	skipped question	0
		an and the second secon
· ·		and the second second second section of the section of
		diging the state of the state o
3. How many employees ar	e under your supervision?	
3. How many employees ar	e under your supervision? Response	Response
3. How many employees ar	Later of the state	Response Count
	Response Percent	Count
3. How many employees ar	Response Percent 51.4%	4
	Response Percent	Count
5 or less 6-10	Response Percent 51.4%	Count 18 section (Note: April 1985) to the Country
5 or less	Response Percent 51.4% 17.1%	Count 18 Exercise control of the c
5 or less 6-10	Response Percent 51.4% 17.1%	Count 18 Exercises Address A
5 or less 6-10 11-20	Response Percent 51.4% 17.1%	Count 18 Secretarion control

4. How long have you worked for this agency?

	Response Percent	Response Count
Over 3 years	88.2%	30
3 years or less	11.8%	.4
answe	red question	34
skipp	oed question	al Milliaghang an ann ann ann a' Mhairtean a bainnin Mhairtean ag ann an an an an ann ann ann ann an

5. Each agency head may distribute a statement in support of Equal Employment Opportunity to all employees. Have you received a copy of your agency's EEO Policy Statement?

					Response Re Percent C	
	Ŷe	S. Paraga			94.1%	32
	N	0			0.0%	0
	Do not remembe			The province was a second of the field of th	5.9%	2
Fig. 12				answei	red question	34
				skipp	ed question	

6. In your agency, where can the EEO Policy be found? (Check all that apply.)

		Response Percent	Response Count
A CAMPAGE OF THE STATE OF THE S			_
The EEO Office	en segue parameter of grant and	15.2%	5
and the second of the second o		ika ili seedi. 19 yahta een 1992 Suuri paruntakeen teetaksi tiista ili suu sat	No. 1865 Committee State of the Committee Sta
The HR/Personnel Office		90.9%	30
The first of the first of the second states and the second states and the second states and the second states are second states as the second states are second states a	在中国中国中国中国中国中国中国中国中国中国中国中国中国中国中国中国中国中国中国	San	CHEROPAR-GERMAN PROPERTY PERSONNEL
The Intranet	The second of	84.8%	28
The British Committee of American American American Committee of Commi	rministra plantura and historia plantura anni di plantura propositioni delle compressioni propositioni della compressioni della	A STATE OF THE STA	e in the last restauration of the last
Your Office		33.3%	11
Do not know		0.0%	0
	ans	wered question	33
	si	ipped question	2

7. Of the choices above, which is most easily accessible to you?

de la companya de la		Security and the security of t	
	Response F Percent		
0	0.0%		The EEO Office
7	21.2%		The HR/Personnel Office
22	66.7%		The Intranet
4	12.1%	Continue to the second	Your Office
33	answered question		
2	skipped question	de actività i inque a meritany mandat del mangani mandet de communicación de participat de la communicación de	i Aguin min in filipe a minin strangara akada daga ibang perangan minan minan minin minin ing ilim dan akadi n

8. Is the Discrimination Complaint Procedure included with the EEO Policy?

		Response Percent	Response Count
Ye	S and the state of	87.5%	28
	Commission of the second commission of the sec	0.0%	0
Do not know	PER-MINISTER DESCRIPTION OF CONTROL OF CONTR	12.5%	4
The control of the co	Company of the Compan	answered question	32
		skipped question	3
9. Do you know the name	of your agency's EEO Officer?		
		Response - Percent	Response Count
Ye. Ye	S	84.4%	27
I de la companya de l	0	15.6%	Ę
		answered question	32
		skipped question	re built
and and the region of the skill was a chief brief and the least of a large filter and the large of the skill of	eet with you, either individually or in a gr	oup setting, to dis	cuss
your EEO rights as an em	ployee?		
		Response Percent	Response Count
Ye	S	81.3%	26
un managan makanatan mengalah bahari dan mengalah M	residence demonstratificate and employees and control process and	18.8%	and the second of the second s
	the second secon	answered question	32

skipped question

3

11. Did the EEO Officer meet with you, either individually or in a groupour EEO responsibilities as a supervisor or manager?

· •	Yes	relies where the second	· are more
	No	25.0%	8
	· · · · · ·	answered question	32
philadian and a section of a section of the section	ener en di nomen anno sensitari	skipped question	3.
a la companya di manganta di dipana di Angangan da mangan da mangan da mangan da mangan da mangan da mangan da	فيمان مستميد للمحافي بوجري سأسلم	ACTIVITIES OF THE PROPERTY OF	
erita e nata e a caracter de la proposition de la constantina de la constantina de la constantina de la consta	ing a second of the second of		
12 Did you comple	e the De	epartment of Citywide Administrative Services' Citywide	EEO
12. Did you complet Computer-Based Ti	te the De	epartment of Citywide Administrative Services' Citywide for Managers and Supervisors?	EEO
12. Did you completed Computer-Based Transfer	te the De	or Managers and Supervisors?	
12. Did you complei Computer-Based Ti	te the De	epartment of Citywide Administrative Services' Citywide for Managers and Supervisors? Response Percent	
12. Did you complet Computer-Based Tr	ie the De raining f	or Managers and Supervisors? Response	e Response Count
12. Did you complete Computer-Based Tr	raining f	or Managers and Supervisors? Response Percent	e Response Count
Computer-Based Ti	raining f	Response Percent 40.6%	Response Count 13

skipped question

13. In your role as a supervisor/manager, how often have you reaffirmed the agency's commitment to the principle of Equal Employment Opportunity during staff meetings within the past year?

	Response R	esponse Count
Two or more times	12.9%	4
One time	29.0%	9
At no time	58.1%	18
	ed question ed question	31

14. In your role as a supervisor/manager, how often have you discussed with employees their right to file a discrimination complaint with the agency's EEO Officer during staff meetings within the past year?

	Response Percent	
Two or more times	0.0%	0
One time.	25.8%	8
At no time	74.2%	23
answere	d question	31
skippe	d question	4

15. Did you receive sexual harassment prevention training from your agency?

					Response Percent	Respons Count
	Yes			undirect.	74.2%	2
	No Section for the section of the se	entidas entinte electronici in cità, le centra de l'estable el Control de l'estable electronici in control de l'estable electronici de l'estable e	न्तुः, स्तुन्थाः (स्टब्स्) (स्टा प्रकारः) तत्त्वः स्टब्स्यः (त्रिक्त्यः) स्टब्स्यः (त्रिक्त्यः) स्टब्स्	දෙන ප්‍රතිශ්ය සිද්ද සුදු සුදු වෙන ප්‍රතිශ්ය සිදු සිදු සිදු සිදු සිදු සිදු සිදු සිදු	25.8%	Them all Armidian Object Physics — In a
in Swig to the Springer Control of the Springer Contro	government of market	erro Hart, Farente I. I. a. e. e.		answei	ed question	3
				skipp	ed question	
16. Did all of the em	plovees that	vou supervi	se receive sex	cual harassme	nt preventi	on
raining?						
					Response Percent	Respons Count
	Yes			Landa. Viring depulify rither illered a state of market experience of exercise	51.6%	1
	No Esse				9.7%	to the second se

17. When you were hired, did you receive an orientation session that included a review of the EEO policy?

Do not know

ing and the second of the seco	And a state of security and any of the security of the securit	Response	Response
		Percent	Count
Yes		41.9%	13
No	Control Contro	6.5%	2
Do not remember	According to the state of the s	51.6%	16
		answered question	31
		skipped question	4

38.7%

answered question

skipped question

12

18. Do you participate in orientation sessions for new employees?

	Response Percent	Response Count
Yes	38.7%	12
No	g in an early a great angulation from street and an extension of the street and t	municosa en encuento
en kontrol de seeman oo en oorste oorste kontrol oorste toeren oorste oorste oorste oorste oorste oorste oorst Oorste oorste oorst	answered question	3
	skipped question	enterior and the second of the second of
	on the EEO policy?	
19. Do new employee orientation sessions include information		a kan car, Area sa melyulkadisah
	Response Percent	Respons Count
Yes	91.7%	1
No	0.0%	
Do not know	8.3%	
	answered question	
	skipped question	1
constitute for settions in your agency?		
20. Do you interview candidates for positions in your agency?		List type (September 1997)
	Response Percent	Response Count
Yes	83.9%	2
NO TO STATE A STATE OF THE STAT	16.1%	
	the contract of the contract o	artes Significant in

skipped question

21. A structured interview is a method that standardizes the type and order of interview questions asked to ensure that a fair comparison can be made between interviewees. Did your agency provide you with training and/or a guide that outlines illegal or discriminatory questions and includes instructions for conducting a structured interview?

				Response Percent	Response Count
and the second s	Training	· - ·		15.4%	4
	Guide		Sania Sada	46.2%	12
Both training	and guide			34.6%	9
	Neither			3.8%	
	ratio personal mentil months from the			answered question	26
The factor of the state of the				skipped question	9

22. Were you informed that fulfillment of your EEO responsibilities will be part of your overall performance evaluation and will be considered in determining your eligibility for promotions and merit increases?

	Response R Percent	esponse Count
Yes	54.8%	17
No.	45.2%	14
	answered question	31
- white the results in the same and the same is the same and the same	skipped question	4

23. When was your last performance evaluation?

		Response Percent	Response Count
			_ :
Within the past year	The state of the s	83.9%	26
and the second s	大学 機能性 化酸酸 人名意内 自己的 はい ない ない ない さいかんこう (女子) ない ない かいかい かい いっぱい かいかい (おおお かいかい (ない) かい	A CON	- Part of the Common of the Enter
Over a year ago	- 1	6.5%	2
The first of the state of the s		open mengeneral i ekimanistikat (1995-tek 2015-tek 2015-tek 2015-tek	AND THE PROPERTY OF THE PROPER
I have not received a performance	The state of the s	9.7%	3
evaluation	· ·		
enga serta da minusa programan da manda santa santa transporta da manda sa minusa de manda se minusa se minusa	是是是一种的种种,可以不可以是一种的种种,可以是是一种的种种,但是一种的种种,但是一种的种种,但是一种的种种,但是一种的种种,是一种种种的种种,是一种种种种的种	Manderine Male a semante a compression de la com	and the mark that is provided the control of the co
	ans	wered question	31
	Sk	ipped question	4

24. Does your performance evaluation include an EEO component? (A section that rates your ability to make employment decisions based on merit and equal consideration, or treat others in an equitable and impartial manner.)

		Response Response Percent Count
Yes		32.1% 9
No		67.9% 19
	Ę	answered question 28
		skipped question 7.

25. Do you conduct formal performance evaluations of the employees under your supervision annually?

	Response Percent	Response Count
Yes	93.5%	29
No	whitelete 6.5%	2
	answered question	31
	skipped question	4

26. Do you believe the agency has provided sufficient training to supervisors/managers on their responsibilities in assisting employees who may complain about discrimination or harassment?

		Response Percent	Response Count
Yes		77.4%	24
		22.6%	7
мбай (какон). Сайна на учените "шин какон и ченивай поет ален на учение на неговение на на	en anna en en en en annagesken åren gam i e si unsernamenten mennete en en ekke er en en en en en en en en en E	answered question	31
		skipped question	ettenskon et den gester til kje etter spesse ska segen sk 4 18 18
27. Race/Ethnicity			
		Response Percent	Response Count
Aslan or Pacific Islander		8.3%	2
American Indian or Alaska Native		0.0%	0
Black (not of Hispanic origin)		16.7%	4
Hispanic	Sale of survival community and only to community and an advantage of the community and an advantage of the community and adv	8.3%	2
White (not of Hispanic origin)		62.5%	15
Other	COLUMN TO THE PROPERTY OF T	4.2%	1
kateriak interna orangi kater usak ozar pi pa lajerakan paraka kateriak nepa tepa transici, eran kajak et eran Kateriak	erika sanda madamakan (1792-124) sanda sandan sanda	answered question	24
कर गण्याच्या विकास क्षेत्रकार काष्ट्रकार कृतिकार क्षेत्रकार कि क्षेत्रकार पात्रकार का १५, ४०० क्ष्याच्या कार्य विकास क्षेत्रकार कार्यकार कार्यकार कार्यकार कार्यकार कि क्ष्याच्या कार्यकार कार्यकार कार्यकार कार्यकार कार्यका	allows block of the state of th	skipped question	11

28. Gender

•			onse cent	Response Count
	Male		32.0%	8
· · · · · · · · · · · · · · · · · · ·	Female	A SECRETARY CONTROL OF THE PROPERTY OF THE PRO	8.0%	17
		answered que		25
		skip ped que	stion	10

Appendix - 6

New York City Housing Development Corporation <u>External Complaints</u>*

Total number of external complaints filed: 3

	7-22-20-27	e volument de la companya del companya de la companya de la companya del companya de la companya		
Name of Outside Agency	Year	Nature of complaint	Status of complaint (incl. finding by outside agency)	
EEOC	2006	National Origin	Dismissed	
Federal District Court	2007	National Origin	Pending	
EEOC	2009	Age/Disability	Unable to Conclude Violation	
Federal District Court	2010	Age/Disability	Discovery Phase/Pending	
EEOC	2007	National Origin	Unable to Conclude Violation	
U.S. District	2009	National Origin	Discovery Phase/Pending	
Court				
	- Vietness of the Community of the Commu			
	C (PRESENTAL ACT - C) T VY (C)			
	-			
	· ·			
`				
	PPERMILIANA			

^{*}Filed During the Audit Period