



EQUAL EMPLOYMENT PRACTICES COMMISSION

City of New York

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Deputy Director

March 20, 2008

Douglas C. James

EEO Officer

Department of Homeless Services

33 Beaver Street, Room 1762

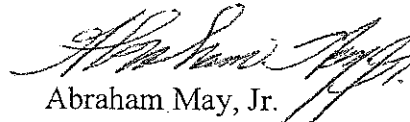
New York, New York 10004

Re: Resolution #08/01-071/Preliminary Determination Pursuant to the Audit of the Department of Homeless Services (DHS) and its Compliance with the City's Equal Employment Opportunity Policy from January 1, 2005 through June 30, 2006.

Dear Mr. James:

Enclosed is the Preliminary Determination. The original was forwarded to Commissioner Robert V. Hess.

Sincerely,



Abraham May, Jr.
Executive Director

Encl:



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Robert V. Hess
Commissioner
Department of Homeless Services
33 Beaver Street
New York, NY 10004

Re: Resolution #08/01-071/Preliminary Determination Pursuant to the Audit of the Department of Homeless Services (DHS) and its Compliance with the City's Equal Employment Opportunity Policy from January 1, 2005 through June 30, 2006.

Dear Commissioner Hess:

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 36(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..."

This letter contains the preliminary determinations of EEPC pursuant to its audit of compliance by the Department of Homeless Services (DHS) during the eighteen month period commencing January 1, 2005 through June 30, 2006. Requests for corrective actions and/or recommendations are included where the EEPC has determined that the DHS has failed to comply in whole or in part with the City's EEO Policy.

All recommendations for corrective actions are consistent with both the audit's findings and the parameters set forth in the EEO policy, which, in accordance with section 815 of the City Charter, holds agency heads responsible for the effective implementation of Equal Employment Opportunity. Therefore, the Department of Homeless Services should incorporate these recommendations in its agency-specific EEO Plan. The relevant sections of the City's EEO Policy are cited in parenthesis at the end of each recommendation. In addition, 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 plans for minority group members and women.

The purpose of this audit is to evaluate the agency's compliance with the City's EEO Policy, 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 DHS's Agency Specific Plans, quarterly EEO reports, and responses to an EEPC Document and Information Request Form. In addition, EEPC auditors conducted in-depth, on-site interviews with the DHS's former EEO officer, career counselor, two EEO investigators, and the personnel director. The DHS's newly appointed EEO Officer Douglas James, who was appointed in June 2007, did not participate in this audit. Therefore, all indication of "EEO officer" in this letter refers to the former EEO officer. The DHS's Audit Director, Michael King, and the agency's Audit unit staff coordinated the EEO staff interviews and insured that all of the documents requested by the EEPC were submitted.

A survey of 1,000 people employed by the DHS during the audit period was distributed. (This number excludes 84 surveys that were returned as undeliverable.) One hundred twenty-two people (12.2%) responded. The results of these surveys are discussed in the proceeding pages and also attached. (Appendix 1)

Description of the Agency

The DHS was established as a permanent agency by Local Law 19 of 1999. The Department of Homeless Services' mission is to provide temporary emergency shelter for eligible homeless people in a safe, supportive environment, in partnership with public and private agencies. In an atmosphere of cooperation and respect, the DHS delivers services through a continuum of care, where the client assumes responsibility for achieving the goal of independent funding.

Personnel Activity During the Audit Period

During the audit period, 427 people were hired: 77 Caucasians, 250 African-Americans, 71 Hispanics, 27 Asians, and 2 Native Americans. Of the individuals hired, 239 were female. Two hundred sixteen individuals were promoted during the audit period: 54 Caucasians, 115 African Americans, 30 Hispanics, 15 Asians, 1 Native American, and 1 unknown. Of the employees promoted, 115 were female. (Appendix 2)

The DHS reports that 149 full-time employees were involuntarily separated during the audit period: 13 Caucasians, 109 African-Americans, 5 Asians, 21 Hispanics and 1 Native American. Ninety-two of those individuals were female.

As of December 2006, the DHS employed 2,077 people: 349 Caucasians, 1,294 African Americans, 343 Hispanics, 80 Asians, 9 Native Americans, and 2 unknown. Nine hundred and fifty-eight of the employees were women (46%). Between December 2005 and December 2006, the total number of DHS employees decreased by 8% going from 2,255 to 2,077. The percentage of African-Americans, Hispanics, and Asians remained the same (Appendices 3 and 4).

Discrimination Complaint Activity During the Audit Period

Thirty internal discrimination complaints were filed during the audit period: 13 were based on multiple categories, 7 were based on sexual harassment, 3 were based on gender, 2 were based on race, and one each was based on age, sexual orientation, disability, religion, and retaliation. Eight of the complaints were administratively closed, 7 received no probable cause determinations, 6 received probable cause determinations, 5 were withdrawn, 2 were unsubstantiated and 2 were mediated.

Twenty-seven external complaints were filed against the agency during the audit period. Thirteen were based on multiple categories, 7 were based on disability, 3 were based on sexual orientation, 3 were based on retaliation, and 1 was based on national origin. Fourteen of the complaints received no probable cause, 6 are still awaiting a decision, 4 were administratively closed, 2 received probable cause, and 1 was withdrawn.

PRELIMINARY DETERMINATION

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

Plan Dissemination – Internally

The DHS is in compliance with the following requirements:

1. In 2005, the agency head distributed a general EEO policy statement memo to all employees reiterating her commitment to EEO, advising employees of the names, locations, and phone numbers of the EEO officer and Career Counselor, and providing electronic links to the Citywide EEO Policy and EEO Policy Handbook. A copy of the Citywide EEO Policy was attached to the memo. The EEO officer informed EEPC auditors that during EEO training sessions in 2005, the DHS distributed the Citywide EEO Policy and the EEO Policy Handbook to DHS employees. In addition, 79% of the employees surveyed by the EEPC indicated they had received the EEO Policy and 90% indicated that they had received the EEO Policy Handbook.
2. According to the agency's EEO Officer and 69% of the employees surveyed, the DHS's EEO policies are posted on agency bulletin boards throughout the department's six floors. The

EEO Officer continually checks and maintains the boards to ensure that the EEO information is clearly posted and current.

3. The EEO Officer informed EEPC auditors that, during the new employee orientation, the personnel director ensured that all employees are advised of the City's EEO policies, the employees' rights and responsibilities under such policies, and the discrimination complaint procedures.

The DHS is in partial compliance with the following requirement:

The EEO Officer informed EEPC auditors that the Citywide EEO Policy and EEO Policy Handbook was included in the new hire packet, which was distributed at new employee orientations, and are accompanied with the Mayor's policy statement. The new hire packet, which was given to the EEPC auditors, however, does not contain the Citywide EEO Policy or EEO Policy handbook. Corrective action is required.

Recommendation: To comply with the Citywide EEO Policy and to ensure a uniform internal distribution process, the new hire package should include the Citywide EEO Policy and the EEO Policy Handbook. (Sect. VB, EEOP)

Plan Dissemination – Externally

The DHS is in compliance with the following requirement:

Five job vacancy notices (Special Assistant to the General Counsel, Principal Administrative Associate Level II, Program Counsel, Family Attorney and Peace Officer) submitted by the agency to the EEPC indicate that the Department of Homeless Services is an equal opportunity employer. Ten job advertisements for Agency Attorney Level II and III and Assistant Commissioner of Security similarly indicate that the Department of Homeless Services is an equal opportunity employer.

EEO and Reasonable Accommodation for Persons with Disabilities

The DHS is in compliance with the following requirements:

1. The EEO officer was appointed the disability rights coordinator.
2. The DHS has provided reasonable accommodations to persons with disabilities such as: visual aid computer enhancements, special keyboards and mice, schedule changes, and work reassignments. The DHS provided documentation of reasonable accommodations it provided to employees with disabilities.

The DHS is in partial compliance with the following requirement:

1. The DHS participates in the Section 55-A Program. The EEO officer informed the EEPC auditors that she keeps records of all Section 55-A program participants. However, DHS is uncertain of the number of employees that participated in the Program because the records

can not be located. The EEO officer informed EEPC auditors that the Section 55-A Program pamphlet is distributed during periodic EEO trainings and is also included in the new hire packet, which is distributed to employees during orientation. The new hire packet given to EEPC auditors by the DHS audit director, however, did not contain that pamphlet. Corrective action is required.

Recommendation: To ensure that all employees are made aware of the Program, the Section 55-A Program pamphlets issued by the DCAS should be included in the new hire packet. (Sect. IIB, EEOP)

2. The EEO officer indicated that the DHS's facility at 33 Beaver Street is accessible to, and useable by, persons with disabilities. The bathrooms have grab bars and wide stalls for wheelchair access, low sink and bathroom fixtures, a special chair called "evacuchair" for persons with wheelchairs, wheelchair accessible elevators, and Braille in elevators. The DHS has submitted an accessibility for persons with disabilities checklist for each of their 25 facilities. The checklists indicate, however, that not all facilities are completely accessible to persons with disabilities. Corrective action is required.

Recommendation: The DHS should ensure that all its facilities are completely accessible to persons with disabilities.

The DHS is not in compliance with the following requirement:

The EEO officer stated that the DHS does not have the EEO policies in alternate formats available for persons with disabilities.

Recommendation: The DHS should ensure that EEO policies and procedures are available in alternate formats (i.e., large print, audio tape and/or Braille). (Sect.VC, EEOP)

EEO Complaint and Investigation System

The DHS is in compliance with the following requirements:

1. The EEO Officer maintains a monthly log of discrimination complaints filed against the agency.
2. The DHS's EEO officer and EEO investigators have all completed the basic training course for EEO professionals conducted by the Department of Citywide Administrative Services (DCAS).
3. The agency has identified its EEO staff by posting their names and numbers in the agency head EEO Policy statement, and on bulletin boards.
4. During and after the audit period, a male (EEO counselor) and female (EEO officer) were available for complaint intake and investigation.

The DHS is not in compliance with the following requirements:

1. Six of the 10 discrimination complaint files (complaint # 06042, 06046, 06044, 06047, 06037, and 06043) submitted by the DHS do not contain a written notice to complainant/respondent regarding the EEO office's determination. Corrective action is required.

Recommendation: All relevant complaint files should include copies of letters to the complainants and respondents regarding the EEO office's determinations. (DCAS, Discrimination Complaint Procedures Implementation Guidelines, sec. 12b (1993).)

2. All of the complaint files provided to EEPC auditors were missing investigation interview notes.

Recommendation: All relevant complaint files should include word processed notes of the discrimination investigation interviews.

3. The investigation of four complaints (file #06029, 06030, 06031, and 0638) took more than the required 90 days to complete. Corrective action is required.

Recommendation: Whenever possible, the investigation of complaints should be completed within 90 days of the receipt of the complaint. (DCPIG, April 1996 Amendment)

4. The aforementioned files did not contain a letter notifying parties of the delay or projecting a timeframe for completion of the investigation. Corrective action is required.

Recommendation: In circumstances where the investigation cannot be completed within the 90-day timeframe, a notification delay letter, stating the reason for the delay, should be sent to the parties of the investigation. (DCPIG, April 1996 Amendment)

5. The EEO officer informed EEPC auditors that the agency head has signed each confidential report to indicate that it has been reviewed and the recommendation, if any, is approved and adopted. The last 10 complaint files that the DHS provided to EEPC auditors, however, did not contain a confidential written report with the agency head signature. Corrective action is required.

Recommendation: At the conclusion of a discrimination complaint investigation, the EEO professional should prepare a confidential written report in accordance with the Discrimination Complaint Procedure Implementation Guidelines. (DCPIG, sect. 12b)

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

EEO Training

The DHS is in compliance with the following requirement:

The DHS provides EEO training on an ongoing basis. The EEO Officer informed EEPC auditors that during the audit period, approximately 700 employees (34% of DHS workforce) were trained. The training was based on DCAS standards and included a component on preventing sexual harassment. In addition, 76% of survey respondents indicated they received EEO training.

Selection and Recruitment

The DHS is in compliance with the following requirements:

1. According to the DHS's EEO officer, all DHS personnel involved in the recruitment and hiring have received DCAS's structured interview training.
2. Job vacancy notices for the Assistant Commissioner of Security position was advertised in periodicals with large minority readership, such as *El Diario* and the *Amsterdam News*.

The DHS is not in compliance with the following requirement:

The DHS's response to the EEPC's Document and Information Request Form indicated that the agency did not conduct an adverse impact study during the audit period. The DHS's EEO officer did say she has reviewed the agency's interview log system to access the agency's hiring practices. Corrective action is required.

Recommendation: The DHS should secure the necessary training, either from DCAS or another appropriate source, to 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. (Section IV, EEOP).

Promotional Opportunities

The DHS is in compliance with the following requirements:

The DHS has appointed an individual familiar with civil service and provisional jobs to serve as career counselor. A memo was distributed to all employees listing the name, address, and phone number of the counselor.

The DHS is not in compliance with the following requirement:

According to the DHS's EEO Plan for Fiscal Year 2006, an EEO component has been included in its managerial performance evaluation form. However, there is no EEO component included in the managerial performance evaluation form that the DHS provided to EEPC auditors. Corrective action is required.

Recommendation: The DHS should include a rating on EEO in their managerial evaluation form or use the managerial performance evaluation form designed by the DCAS, which contains a rating for EEO.

EEO Officer Reporting Arrangement

The DHS is in partial compliance with the following requirement:

The EEO officer reports to a direct report to the agency head on EEO matters and meets with him on a daily basis. According to the DHS, DCAS is aware of this reporting structure. However, the EEO Officer does not take notes or have documentation of these meetings. Corrective action is required.

Recommendation: It is the Commission's position that appropriate documentation of meetings and other communications between the EEO officer and the direct report to the agency head regarding EEO program operational decisions be maintained.

EEO Officer Responsibilities

The DHS is in compliance with the following requirements:

1. The EEO Officer spends 100% of her time on EEO matters.
2. The EEO Officer meets regularly with the EEO investigators to review their work and to keep them abreast on EEO developments. Documentation of these meetings was provided to EEPC auditors.

The DHS is not in compliance with the following requirement:

The EEO officer told EEPC auditors that she is not involved in developing recruitment strategies or selecting recruitment media; that is the sole responsibility of the human resources department.

Recommendation: To ensure fair employment practices, the agency head should direct the human resources department to include the EEO officer in the development of recruitment strategies and the selection of recruitment media. (Sect. IV, EEOP)

Supervisory Responsibility in EEO Plan Implementation

The DHS is in partial compliance with the following requirements:

The EEO officer informed EEPC auditors that in a memo from the agency head, managers and supervisors were directed to conduct meetings with staff, at least once a year, to reaffirm their commitment to the Citywide EEOP and discuss the right of employees to file discrimination complaints with the EEO officer. The EEO officer, though, indicated that she is uncertain if these meetings are documented. Corrective action is required.

Recommendation: It is the Commission's position that meetings between managers/supervisors and staff where they affirm their managerial commitment to the Citywide EEOP should be documented.

Special Problems/Contingencies

The DHS is not in compliance with the following requirement:

Seventy-four percent of survey respondents indicated that they do not know the name of the person in the agency responsible for providing career counseling. Corrective action is required.

Recommendation: The DHS personnel officer should notify all employees in writing of the name, location, and telephone number/email address of the career counselor. (Sect. VF, EEOP)

SUMMARY OF RECOMMENDED CORRECTIVE ACTIONS

1. To comply with the Citywide EEO Policy and to ensure a uniform internal distribution process, the new hire package should include the Citywide EEO Policy and the EEO Policy Handbook. (Sect. VB, EEOP)
2. To ensure that all employees are made aware of the Program, the Section 55-A Program pamphlets issued by the DCAS should be included in the new hire packet. (Sect. IIB, EEOP)
3. The DHS should ensure that all its facilities are completely accessible to persons with disabilities.
4. The DHS should ensure that EEO policies and procedures are available in alternate formats (i.e., large print, audio tape and/or Braille). (Sect. VC, EEOP)
5. All relevant complaint files should include copies of letters to the complainants and respondents regarding the EEO office's determinations. (DCAS, Discrimination Complaint Procedures Implementation Guidelines, sec. 12b (1993).)
6. All relevant complaint files should include word processed notes of the discrimination investigation interviews.
7. Whenever possible, the investigation of complaints should be completed within 90 days of the receipt of the complaint. (DCPIG, April 1996 Amendment)
8. In circumstances where the investigation cannot be completed within the 90-day timeframe, a notification delay letter, stating the reason for the delay, should be sent to the parties of the investigation. (DCPIG, April 1996 Amendment)

9. At the conclusion of a discrimination complaint investigation, the EEO professional should prepare a confidential written report in accordance with the Discrimination Complaint Procedure Implementation Guidelines. (DCPIG, sect. 12b)
10. The agency head should sign each confidential report to indicate that it has been reviewed and whether the recommendation, if any, is approved and adopted. Such sign off may be in written or electronic form. (Sect. VB, EEOP and DCPIG, sect. 12b)
11. The DHS should secure the necessary training, either from DCAS or another appropriate source, to 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. (Section IV, EEOP).
12. The DHS should include a rating on EEO in their managerial evaluation form or use the managerial performance evaluation form designed by the DCAS, which contains a rating for EEO.
13. It is the Commission's position that appropriate documentation of meetings and other communications between the EEO officer and the direct report to the agency head regarding EEO program operational decisions be maintained.
14. The EEO officer must report directly to the agency head, or if approved by DCAS, to a direct report to the agency head on all EEO matters. (Sect. VB, EEOP)
15. To ensure fair employment practices, the agency head should direct the human resources department to include the EEO officer in the development of recruitment strategies and the selection of recruitment media. (Sect. IV, EEOP)
16. It is the Commission's position that meetings between managers/supervisors and staff where they affirm their managerial commitment to the Citywide EEOP should be documented.
17. The DHS personnel officer should notify all employees in writing of the name, location, and telephone number/email address of the career counselor. (Sect. VF, EEOP)

In addition to the above recommendations, during the compliance process, the Commission requires that the agency head distribute a memorandum to all staff informing them of the changes that are being implemented in the agency's EEO program pursuant to the audit. This memorandum should re-emphasize the agency head's commitment to the agency's Equal Employment Opportunity 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 Department of Homeless Services compliance with its Equal Employment Opportunity Policy, 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, and which recommendations it intends to incorporate into its Equal Employment Opportunity Plan, where appropriate, to comply with the City's Equal Employment Opportunity Policy. As you informed us during the exit meeting on February 8, 2008, you have already implemented some of our recommended corrective actions. Please specify those corrective actions in your response. Please forward your response within thirty days of receipt of this letter.

Pursuant to Section 832 of the New York City Charter, as amended in 1999, 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 to the Mayor the appropriate corrective actions that you should implement in your agency's Equal Employment Opportunity Plan.

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

Sincerely,



Ernest F. Hart, Esq.
Chair

APPENDIX - 1

DEPARTMENT OF HOMELESS SERVICES
EMPLOYEE SURVEY RESULTS

A. GENERAL OVERVIEW

1. Do you know who your agency's EEO Officer is?
Yes (66) No (54)
2. Is your agency's EEO Policy Statement posted on your agency's bulletin boards?
Yes (74) No (34)
3. Were you given the EEO Policy Statement?
Yes (96) No (6) Do not remember (20)
4. Were you given a copy of the EEO Policy Handbook – *About EEO: What You Need to Know*?
Yes (106) No (12)
5. Do you agree with the principles of equal employment opportunity?
Yes (108) No (5)
6. Do you believe your agency practices equal employment opportunity?
Yes (56) No (61)
7. Do you know what the City's Equal Employment Opportunity Policy (EEOP) is?
Yes (96) No (22)
8. Has your supervisor emphasized his/her commitment to the agency's EEO policies at any staff meeting during the past 8 months?
Yes (33) No (67) Do not remember (21)
9. When you started working at your agency, did you attend an orientation session?
If No, please skip to question #11.
Yes (93) No (18) Do not remember (8)
10. If hired within the past 12 months, did your orientation session include information on your rights and responsibilities under the EEO Policy?
Yes (30) No (9) Do not remember (9)

B. EEO COMPLAINTS

11. Do you know how to file an EEO complaint?
Yes (83) No (39)
12. If you had an EEO complaint, would you bring it to your agency's EEO Office?
Yes (62) No (32) Undecided (28)

DEPARTMENT OF HOMELESS SERVICES SURVEY RESULTS CONTINUED

13. Would you prefer to file an EEO complaint with an office outside your agency?
Yes (69) No (20) Undecided (32)

14. Did you ever file an EEO complaint with your agency's EEO Office?
If No, please skip to question #18.
Yes (16) No (101)

15. What was the basis of the complaint?

Age (0)	Partnership Status (0)
Alienage or Citizen Status (0)	Predisposing genetic characteristic (0)
Arrest or Conviction Record (0)	Race (4)
Color (0)	Sexual Harassment (0)
Creed (1)	Sexual Orientation (0)
Disability (2)	Veteran's Status (0)
Gender (incl. gender identity) (1)	Victim of Domestic Violence, Stalking, and Sex Offenses (0)
Marital Status (0)	Other (5)
Military Status (0)	
National Origin (0)	

16. Were you satisfied with the manner in which your complaint was managed?
Yes (6) No (11)

17. Was your manager or supervisor supportive of your right to file a complaint?
Yes (3) No (10) Not Applicable (2)

C. EEO TRAINING

18. Did you receive EEO training? If No, please skip to question #20.
Yes (90) No (29)

19. Did you find this training helpful?
Very (27) Somewhat (49)
Not really (0) Waste of time (4)

D. JOB PERFORMANCE/ADVANCEMENT

20. Did you see your agency's job postings on agency bulletin boards for vacant positions prior to the application deadline?
Yes (61) No (44) Do not remember (9)

21. If you were employed at your agency for over one year, did you receive annual evaluations?
If No, skip to question #24.
Yes (69) No (41) Not employed
for >1 year (0)

22. Did your evaluation contain recommendations for improving your job performance?
Yes (46) No (39)

DEPARTMENT OF HOMELESS SERVICES SURVEY RESULTS CONTINUED

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

Yes (15) No (70)

24. Do you know the name of the person in your agency who is responsible for providing career counseling?

Yes (30) No (87)

E. AFFIRMATIVE ACTION FOR PERSONS WITH DISABILITIES

25. Are your agency's facilities accessible for persons with disabilities?

Yes (64) No (23) Don't Know (24)

26. Did you ever ask for an accommodation for a physical or mental disability?

If No, skip to question #28.

Yes (13) No (91)

27. Did the agency accommodate you?

Yes (3) No (17)

OPTIONAL

28. What is your race/ethnicity?

Asian (5)	Native American (0)
Black (55)	White (23)
Hispanic (17)	Other (9)

29. What is your gender?

Male (47) Female (63)

APPENDIX – 2

The following table indicates personnel activity during the audit period, January 1, 2005 through June 30, 2006.

[Department of Homeless Services]

Hires by Sex and Ethnicity

Total Hires: 427

Male	Female	Total	Caucasian	African American	Hispanic	Asian	Native American	Total
188	239	427	77	250	71	27	2	427

Promotions by Sex and Ethnicity

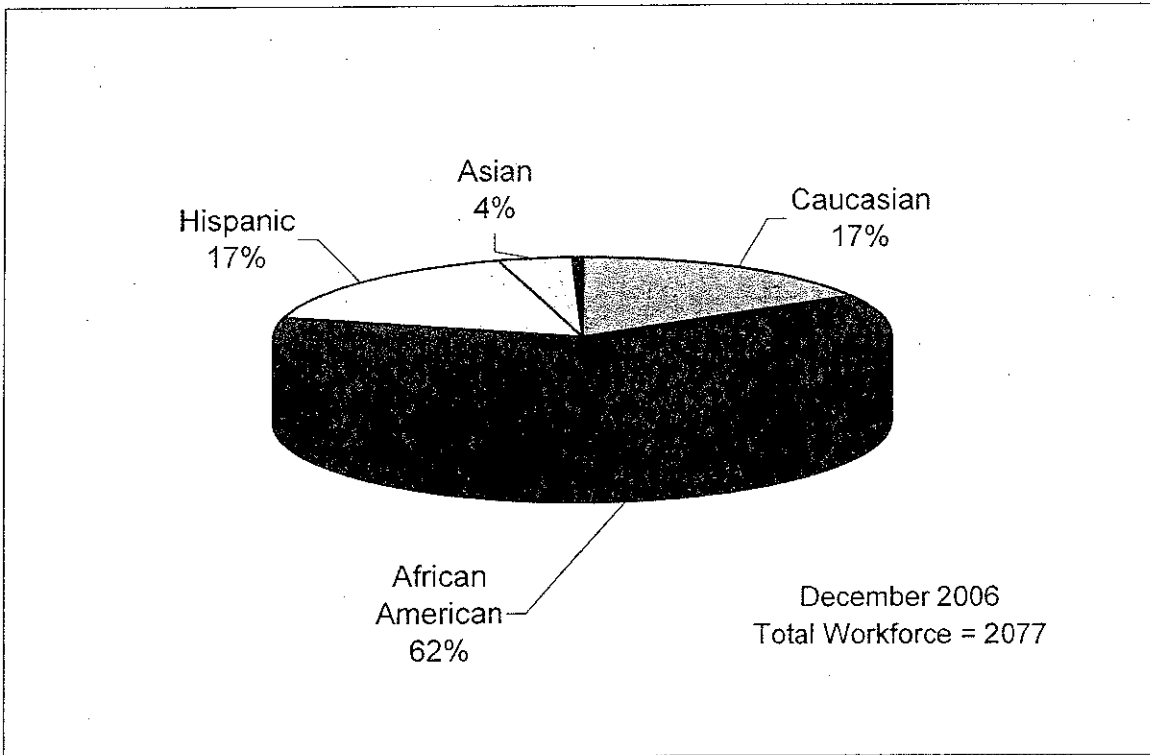
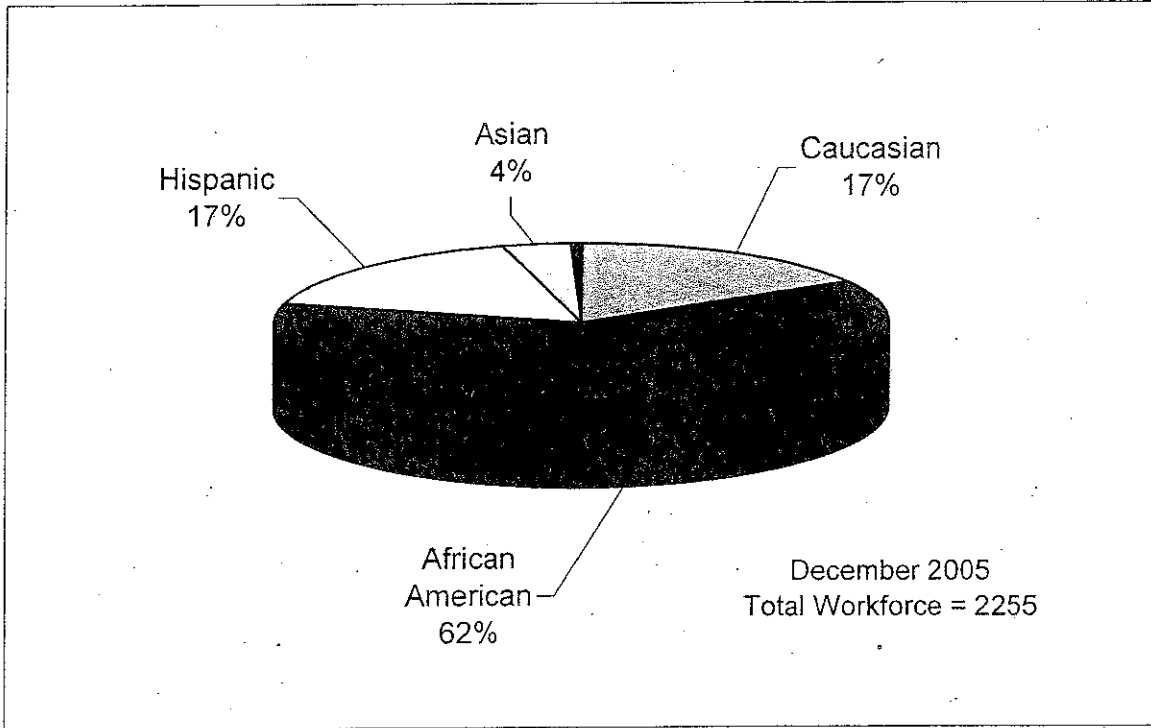
Total Promotions: 216

Male	Female	Total	Caucasian	African American	Hispanic	Asian	Native American	Unknown	Total
101	115	216	54	115	30	15	1	1	216

Source: Audit data supplied by [DHS]

Appendix - 3

Department of Homeless Services
Workforce by Ethnicity



Appendix - 4

Department of Homeless Services
Workforce by Ethnicity

