



sanitation

JOHN J. DOHERTY
Commissioner

125 Worth Street, Room 720
New York, NY 10013
Telephone (646) 885-4974
Fax (212) 385-2560

January 17, 2014

Cesar A. Perez, Esq.
Chair
New York City Equal Employment Practices Commission
253 Broadway
Suite 602
New York, N.Y. 10007

Re: *Final Determination Pursuant to the Audit and Analysis of the NYC Department of Sanitation Equal Employment Opportunity Program from January 1, 2012 to June 30, 2013.*

Dear Chairman Perez:

Thank you for your recent letter concerning the results of the EEPC's Audit of Sanitation's EEO Program.

I understand that the EEPC requires **four (4) corrective actions** with regard to DSNY's *Selection and Recruitment System*.

Corrective Action #1

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.

The following demonstrates our efforts to implement Corrective Action # 1:

- DSNY EEO Director has reviewed the recruitment efforts for the recent discretionary positions of Computer Specialist, Medical Records Librarian, Community Associate and Community Coordinator – adverse impact was not demonstrated for individuals within these titles.
- In each title, a member of a protected group was selected.
- In the Community Coordinator title, two current employees were moved up.
- DSNY EEO has met with the DSNY Human Resources Classification Officer to discuss and identify relevant professional and community organizations which may assist with recruitment in the future in these areas, such as the *Anita Borg Institute for Women & Technology*, *America's Heroes at Work*, *(Veterans)*, and *the Fortune Society (ex-offenders)*.
- Additionally, an informational packet of potential recruitment avenues will be put together and forwarded to hiring managers.

www.nyc.gov/sanitation

KEEP NYC CLEAN



REDUCE, REUSE, RECYCLE



printed on recycled paper



DON'T LITTER

Corrective Action #2

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.

The following demonstrates our efforts to implement Corrective Action #2:

- The DSNY EEO Office plans to send correspondence to several organizations serving women, minorities and other protected groups regarding *NYC Careers.gov* and how they can apply for DSNY jobs through *e-Hire* as well as apply to take civil service exams.

Corrective Action #3

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. 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.

The following demonstrates our efforts to implement Corrective Action # 3:

- The civil service titles of Sanitation Worker, Sanitation Supervisor, and General Superintendent represent approximately 80% of all positions in DSNY and uniformed civil service titles. Because the job has been non-traditional for females, numbers for women, who were introduced to the uniformed ranks in 1986, have increased but remain limited in the workforce. Numbers for minority groups over the years have grown consistently. The requirements have been and will continue to be evaluated and updated.
- Most recently, the EEO Director has been a part of the Executive Board discussing the requirements for the entry level position of Sanitation Worker. Additionally, although plans were being developed for an extended outreach recruitment campaign involving advertising and other contacts to the city's population, the civil service exam was postponed by DCAS until 2015.
- The next most populated job group in DSNY is the CRAFTS. Again, these positions involve jobs which have been considered non-traditional for women. However, if provisional vacancies become available and/or a civil service test is given for jobs such as auto mechanic, electrician, plumber, carpenter and others, then DSNY will reach out to agencies such as *Non-Traditional Employment for Women (NEW)*, and advertise in on-line sites which do outreach to females and minorities in the Trades.

Corrective Action # 4

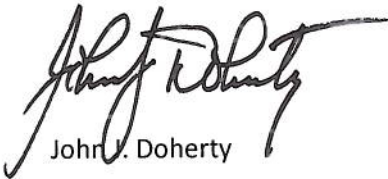
Ensure that human resource professionals, managers, supervisors and other personnel who may be involved in the recruitment and hiring process are trained in EEO and interviewing, selection, and hiring skills to enable such individuals to correctly identify the most capable candidates (i.e. Structured Interview Training or Guide).

The following demonstrates our efforts to implement Corrective Action #4:

- The DSNY EEO Office will take the lead in developing a desktop, laminated guide to interviewing.
- The DSNY Guide will be distributed along with DCAS' Guide to Structured Interviewing to managers and supervisors involved in interviewing.
- The two pieces of information above will be distributed in hard copy to all managers and supervisors during an, "Structured Interviewing Training" which will be coordinated between the EEO Office and the DSNY Bureau of Legal Affairs.
- Employees will also be directed as to where these documents may be found on-line.

I believe the items which I have explained meet with your recommended actions. I will inform all employees of the steps the Department is taking to enhance our EEO Program.

Sincerely,



John J. Doherty

c: Charise L. Hendricks, PHR, EEPD Executive Director
Judith Garcia Quinonez, EEPD Deputy Director/Agency Counsel