



# EQUAL EMPLOYMENT PRACTICES COMMISSION

## SUMMARY COMPLIANCE REPORT

**Agency:** Board of Standards and Appeals

**Agency Head:** Meenakshi Srinivasan, Chairperson

**EEO Officer:** Roy Starrin

**Audit Period:** January 1, 2005 – December 31, 2006

Date of Preliminary Determination Letter:	<i>October 25, 2007</i>
Date of Response Letter:	<i>November 21, 2007</i>
Date of Final Determinations Letter:	<i>December 13, 2007</i>
Date of Response Letter to the Commission's Final Determination Letter:	<i>January 11, 2008</i>

Compliance Initiated:	<i>May 2008</i>
Compliance Completed:	<i>October 2008</i>
Covering Months:	<i>May 2008 - October 2008</i>

**Date:** December 18, 2008

Pursuant to the findings and recommendations of the Equal Employment Practices Commission's (EEPC) Audit of Compliance by the Board of Standards and Appeals (BSA) with the City's Equal Employment Opportunity Policy (EEOP), the EEPC initiated Audit Compliance with the BSA in June 2008. The BSA's final Monthly Compliance Report was submitted on October 28, 2008.

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

1. The BSA should send a general EEO policy statement or memo to all employees. This document should reiterate the agency's commitment to EEO; advise employees of the names, location, and telephone numbers of the EEO professionals; and may provide an electronic link to the EEO Policy Handbook and Citywide EEO Policy. This document, to be sent as a payroll distribution, should be based on the Mayor's January 31, 2005 policy statement and the model agency head statement that is posted on the DCAS "about eeo" website.

The BSA said it distributed a general EEO policy memorandum to all employees. It submitted a copy of the memorandum to the EEPC.

The required action was completed in October 2007.

- 2. The BSA should officially appoint a disabilities rights coordinator and notify all employees in writing of the name, location, and phone number/email address of that individual.**

The BSA said that it appointed its EEO Officer, Mr. Roy Starrin, as the Disabilities Right Coordinator. It submitted a copy of the memorandum, which notified staff of his appointment and contact information.

The required action was completed in April 2008.

- 3. The BSA should follow-up on its pledge to develop a plan, which includes a timetable, to provide EEO training to all employees who have not received it.**

The BSA said that it has developed a plan to provide EEO training to all employees who have not received it. The Department of Finance's EEO training director will provide the training to all employees. The training is tentatively scheduled for December 2008.

The response to the required action was accepted in November 2008.

- 4. When discretionary vacancies arise, the BSA should advertise job vacancies in periodicals with large minority and female readership, and send vacancy notices to professional and community organizations serving minorities, women and persons with disabilities. The BSA may obtain and consult *Making the Most of the City's Recruitment Resources*, the DCAS listing of recruitment sources to create a diverse applicant pool.**

The BSA said that it is committed to implementing this recommendation and the chairperson reaffirmed her commitment in a May 30, 2008 memorandum to the executive director, which said "When discretionary vacancies arise, the BSA should advertise job vacancies in periodicals with large minority and female readership, and send vacancy notices to professional and community organizations serving minorities, women and persons with disabilities." The BSA submitted a list of recruitment sources used to fill two available vacancies.

The required action was completed in October 2008.

- 5. The BSA should either officially appoint a career counselor or notify employees that career counseling is available from the career counselor of the DCAS. In either case, the agency should notify employees in writing of the name, location, and telephone number/email of the individual available to provide the counseling.**

The BSA stated that Mr. Kevin Finnegan, the DCAS Director of Human Resources has been designated Career Counselor for the Board. Employees were notified of his appointment in an October 24, 2007 memorandum from the chairperson. It submitted a copy of the memorandum.

The required action was completed in October 2007.

6. **It is the Commission's position that appropriate documentation of meetings and other communications between the EEO officer and the agency head regarding EEO program operational decisions should be maintained.**

The BSA said it will implement this recommendation. It submitted to the EEPC notes of a meeting that was held on April 7, 2008.

The required action was completed in April 2008.

7. **The agency head (chairperson) should direct the executive director to include the EEO officer in selecting recruitment media and developing recruitment strategy for all vacancies.**

The BSA said that the chairperson in a May 30, 2008 memorandum, directed the executive director to include the EEO officer in selecting recruitment media and developing recruitment strategy for all vacancies. It submitted a copy of the memorandum.

The required action was completed in May 2008.

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

The BSA said it will implement this recommendation. It submitted to the EEPC a copy of the sign-in sheet of a meeting held on April 7, 2008.

The response to the required action was accepted in April 2008.

9. **All employees—managerial and non-managerial should receive annual performance evaluations.**

The BSA said that employees will receive annual performance evaluations. It has developed tasks and standards and all staff will meet with the chairperson and executive director to review the tasks and standards by the end of 2008. It said that the performance evaluation period will begin at the beginning of 2009. It submitted copies of its tasks and standards.

The response to the required action was accepted in November 2008.

10. The BSA's agency head should disseminate an agency-wide memorandum to discuss audit findings.

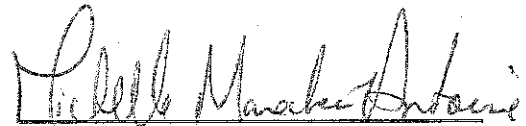
The attached memorandum from Chairperson Meenakshi Srinivasan was distributed on October 30, 2008.

The required action was completed in October 2008.


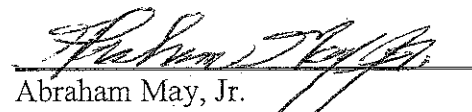
### Recommendation

Based on the above information, we recommend that the Equal Employment Practices Commission issue a Letter of Completion of Compliance to Chairperson Meenakshi Srinivasan, informing her that the BSA has implemented the recommended corrective actions to the Commission's satisfaction.

Respectfully Submitted,



Michelle Marecheau-Antoine  
Senior Auditor/ Compliance Officer

  
Judith Garcia Quiñonez  
Counsel  
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Executive Director

Attachment