



EQUAL EMPLOYMENT PRACTICES COMMISSION

SUMMARY COMPLIANCE REPORT

Agency: Human Resources Administration

Agency Head: Verna Eggleston, Commissioner

EEO Officer: Stephanie Grant

Audit Period: July 1, 2001 - December 31, 2003

Date of Preliminary Determination Letter:	<i>April 27, 2005</i>
Date of Response Letter:	<i>June 13, 2005</i>
Date of Final Determination Letter:	<i>July 5, 2005</i>
Date of Response Letter to the Commission's Final Determination Letter:	<i>September 1, 2005</i>
Compliance Initiated:	<i>December 2005</i>
Compliance Completed:	<i>May 2006</i>
Covering Months:	<i>November 2005 – April 2006</i>

Date: June 8, 2006

Pursuant to the findings and recommendations of the Equal Employment Practices Commission's (EEOC) Audit of Compliance by the Human Resources Administration (HRA) with the City's Equal Employment Opportunity Policy (EEO), EEOC initiated Audit Compliance with the HRA in December 2005.

The HRA's final Monthly Compliance Report was submitted on May 23, 2006. All seventeen required actions were completed or accepted. The following is a summary of the compliance reports:

- 1. All employees should be informed in writing of the name, location and telephone number of the EEO Officer.**

The HRA stated that it distributed "Informational No. 05-11" dated May 25, 2005 and an "EEO is the Law" poster to staff informing them of the EEO Officer's identity. In addition, the information was included in a May 18, 2006 memorandum to staff regarding EEOC's audit

findings. HRA submitted a copy of the informational, poster and memorandum.

The required action was completed in May 2005.

2. **HRA should conduct a survey to ensure that all facilities are accessible for persons with disabilities and inform the EEO Officer of the results.**

The HRA submitted a copy of the accessibility survey results of all its facilities.

The required action was completed in November 2005.

3. **All internal complaint files should contain letters to the parties informing them of the resolution of the complaint.**

The HRA submitted copies of letters sent to both parties informing them of the resolution of the complaint.

The required action was completed in November 2005.

4. **All internal investigative reports must be labeled "confidential" in large bold print.**

The HRA stated that effective January 31, 2005 all files will be conspicuously labeled "confidential." It submitted a copy of an investigative report labeled "confidential."

The required action was completed in January 2005.

5. **The Commissioner should require the Human Resources Director to include the EEO Officer in the recruitment process.**

The HRA submitted a copy of an August 18, 2005 memorandum sent to Ms. Candida Carcana, Human Resources Director, directing her to include the EEO Officer in the recruitment process.

The required action was completed in August 2005.

6. **Since the EEOP requires City agencies to conduct adverse impact studies to determine if certain selection devices adversely impact any particular racial, ethnic, disability or gender group, HRA should secure the necessary training to conduct adverse impact studies, either from DCAS or another appropriate source.**

The HRA said that the EEO Officer attended Cornell University's "Data Analysis for EEO Professionals" training on May 4-5, 2006. It submitted a copy of the attendance letter.

The required action was completed in May 2006.

7. **HRA should inform all employees in writing of the identity, location and telephone number of the Career Counselor. This information should also be updated on the agency's bulletin boards.**

The HRA said that the EEO Office distributed a December 5, 2005 memorandum to staff informing them of the name, location, and telephone number of the Career Counselor.

The required action was completed in December 2005.

8. Supervisors should be informed that they will be rated on EEO Performance.

The HRA submitted a copy of a November 28, 2005 memorandum which was distributed to managers/supervisors informing them that they will be rated on EEO performance.

The required action was completed in November 2005.

9. It is the Commission's position that appropriate documentation of meetings and other communications between the EEO Officer and direct report to the agency head regarding EEO decisions should be maintained.

The HRA submitted a copy of "Executive Order No. E.-709," dated December 1, 2005, documenting communication between the EEO Officer and direct report.

The required action was completed in December 2005.

10. It is the Commission's position that at least twice a year during regular staff meetings, 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.

The HRA said that "Executive Order No. E.-709" also informed staff that managers/supervisors are required to meet at least twice a year during regular staff meetings, to affirm their commitment to the Agency's EEO Policy.

The required action was completed in December 2005.

11. HRA should notify all staff that the EEO Policies are available on the agency intranet. Staff should be further instructed on how to access the policies on line.

The HRA said that "Executive Order No. E.-709" also informed staff that the EEO Policies are available on the agency's intranet.

The required action was completed in December 2005.

12. HRA should replace the EEO Trainer so there can be two full time Counselors/Investigators in addition to the EEO Officer.

The HRA said that it will incorporate the EEO training in the agency-wide training curriculum. It has provided the Agency Trainers with EEO professionals training. It provided a copy of the curriculum along with the sign-in sheet.

The required action was completed in May 2006.

13. **As reflected in the agency specific plan, the EEO Coordinator should be performing EEO related matters.**

The HRA said that it has eliminated the EEO Coordinator position. This required action is now void.

The response to the required action was accepted in November 2005.

14. **HRA should develop a plan, which includes a timeframe, to train new and existing EEO Liaisons/Personnel Officers who have not already received necessary EEO training.**

The HRA stated that at the time of the audit there was one EEO Liaison/Personnel Officer who had not received EEO training. Since the audit that EEO Liaison/Personnel Officer is no longer employed by HRA. The HRA stated that there will not be a replacement.

The response to the required action was accepted in March 2006.

15. **The EEO Officer should meet at least quarterly with the Personnel Officers.**

The HRA said that the EEO Officer and Personnel Officers/EEO Liaisons had a meeting on March 23, 2006. It submitted a copy of the meeting agenda along with a copy of the sign-in sheet.

The required action was completed in March 2006.

16. **The EEO Officer should develop written tasks and/or responsibilities expected of the Personnel Officers/EEO Liaisons.**

The HRA said that the EEO Officer distributed a memorandum dated December 19, 2005 to Personnel Officers/EEO Liaisons citing the tasks and responsibilities expected of them. They were also informed of the quarterly meetings.

The required action was completed in December 2005.

17. **HRA's Commissioner should disseminate an agency-wide memorandum to discuss audit findings.**

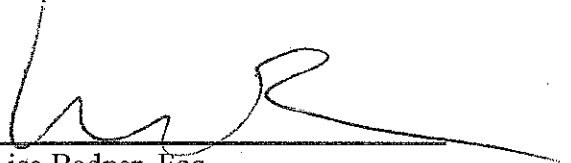
The attached memorandum from Commissioner Verna Eggleston was distributed on May 18, 2006.

The required action was completed in May 2006.

Recommendation

Based on the above information, we recommend that the Equal Employment Practices Commission issue a Letter of Completion of Compliance to Executive Commissioner Verna Eggleston informing her that HRA has implemented the recommended corrective actions to the Commission's satisfaction.


Respectfully Submitted,



Lisa Badner, Esq.
Compliance Director



Eric Matusewitch
Deputy Director



Abraham May, Jr.
Executive Director

Attachment