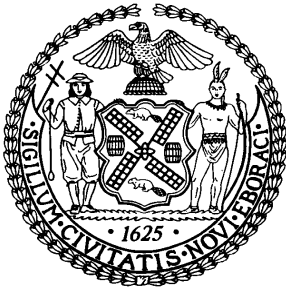


AUDIT REPORT



CITY OF NEW YORK
OFFICE OF THE COMPTROLLER
BUREAU OF MANAGEMENT AUDIT
WILLIAM C. THOMPSON, JR., COMPTROLLER

Audit Report on Potential Savings From Civilianizing Positions in the Department of Sanitation

MH03-078A

May 21, 2003



THE CITY OF NEW YORK
OFFICE OF THE COMPTROLLER
1 CENTRE STREET
NEW YORK, N.Y. 10007-2341

WILLIAM C. THOMPSON, JR.
COMPTROLLER

To the Citizens of the City of New York

Ladies and Gentlemen:

In accordance with the Comptroller's responsibilities contained in Chapter 5, § 93, of the New York City Charter, and in light of the City's budget difficulties, my office has examined opportunities for savings from civilianizing positions in the Department of Sanitation.

The results of our audit, which are presented in this report, have been discussed with Department of Sanitation officials, and their comments were considered in the preparation of this report.

Audits such as this provide a means of ensuring that City resources are used effectively, efficiently, and in the best interests of the public.

I trust that this report contains information that is of interest to you. If you have any questions concerning this report, please e-mail my audit bureau at audit@comptroller.nyc.gov or telephone my office at 212-669-3747

Very truly yours,

A handwritten signature in cursive script that reads "William C. Thompson, Jr.".

William C. Thompson, Jr.

Report: MH03-078A
Filed: May 21, 2003

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*The City of New York
Office of the Comptroller
Bureau of Management Audit*

**Audit Report on Potential Savings
From Civilianizing Positions in the
Department of Sanitation**

MH03-78A

AUDIT REPORT IN BRIEF

This audit of the Department of Sanitation (the Department) reviewed opportunities for savings from civilianizing administrative and support positions in the Department that are currently filled by uniformed personnel.

For Fiscal Year 2003, the operating budget for the Department totaled \$959.3 million, including \$592.3 million for Personal Services and \$367.0 million for Other Than Personal Services Costs. For the same year, the workforce of the Department consisted of approximately 7,500 uniformed and 2,100 civilian employees—a total of approximately 9,600 employees.

Audit Findings and Conclusions

Based on our review, we determined that the Department of Sanitation could save \$5.8 million annually if 313 positions identified in this audit that are now filled by uniformed employees were filled instead by civilian civil service employees.

These 313 positions—filled by 242 Sanitation Workers, 63 Supervisors, and eight GS-Level 1 employees—were identified as having functions not directly related to sanitation activities per se and, in our determination, not requiring the skills of a trained uniformed sanitation employee. As uniformed personnel resign, retire, or otherwise leave the Department, lower cost civilian personnel could be hired or transferred to these units to begin to assume some of the civilian-type functions that are currently performed by uniformed officers.

Recommendations

The Department of Sanitation should:

1. Civilianize the 313 positions identified in this report that have duties not directly related to sanitation activities per se and that are filled by uniformed personnel.

2. Conduct a comprehensive review of all other units to identify additional positions suitable for civilianization that could generate cost savings.

Department Response

The matters covered in this report were discussed with Department officials during and at the conclusion of this audit. A preliminary draft report was sent to Department officials on March 20, 2003, and was discussed at an exit conference held on April 11, 2003. We submitted a draft report to Department officials with a request for comments. We received a written response from Department officials on April 30, 2003.

The Department agreed with both of the audit recommendations, stating: “We will begin to civilianize some positions in our Supervised Sick Leave Unit and assess the impact of this civilianization. We will continue to monitor our job requirements in the coming years, and when the opportunity arises, we will replace uniformed personnel with civilians in titles whose duties, in our judgement, match as closely as possible those of the uniformed staff.”

The full text of the Department comments is included as an addendum to this report.

INTRODUCTION

Background

The mission of the Department of Sanitation (the Department) is to promote a healthy environment through the efficient management of municipal solid waste. The Department collects and exports refuse, and markets recyclables; clears approximately 6,300 miles of City streets; tags and removes derelict vehicles; and enforces various provisions of the health and administrative codes. In addition, the Department is responsible for developing and implementing efficient, environmentally sound long-range plans for managing municipal solid waste and reducing the overall waste stream. The Department's Bureau of Cleaning and Collection and Bureau of Waste Disposal perform most of these operational functions.

The Bureau of Support Operations, the Division of Administration and Fiscal Services, the Bureau of Public Information and Community Affairs, the Bureau of Legal Affairs, the Division of Human Resources, the Division of Personnel Management Division, and other organizational units in the Department provide necessary administrative and support services.

For Fiscal Year 2003, the operating budget for the Department totaled \$959.3 million, including \$592.3 million for Personal Services and \$367.0 million for Other Than Personal Services Costs. For the same year, the workforce of the Department consisted of approximately 7,500 uniformed and 2,100 civilian employees—a total of approximately 9,600 employees. The Department has three uniformed civil service titles: Sanitation Worker, Sanitation Supervisor, and General Superintendent. The General Superintendent (GS) title includes three separate title classifications: GS-Level 1, GS-SCAs¹ (GS-Level 2 and GS-Level 3), and GS-Managerial (GS-Level 4 and above).

On May 31, 2002, the Comptroller's Office issued an audit report, *Follow-up Audit Report on the Opportunities for Savings in Administrative Units through Civilianization in the New York City Police Department* (Audit #MG02-164F), that dealt with the issue of assigning uniformed officers to non-enforcement positions in the Police Department. That audit determined that the Police Department could save more than \$15.2 million annually by employing civilians instead of uniformed police officers to fill 831 non-enforcement positions.

Considering the budget crisis facing the City, and taking into account the potential savings identified in that audit, we have reviewed the Department of Sanitation to determine whether potential savings could be identified by civilianizing primarily support or administrative positions currently filled by uniformed personnel that could otherwise be filled by civilian employees.

Unlike the Police Department, which has an Office of Civilianization and Staff Development that attempts to identify positions that could be civilianized, the Department of Sanitation has no such unit or regular systematic effort to identify uniformed positions for civilianization. Over the years, the Department has occasionally identified certain uniformed positions for civilianization; however, these efforts have not been the result of a systematic or comprehensive review of civilianization opportunities in the Department.

¹ Sanitation Chiefs Association (SCA)

Department Response: “ While we do not have a distinct unit whose sole function is to identify positions in the Department that could be civilianized, the Bureau of Planning & Budget during the normal budget cycle (Adopted, November, Preliminary and Executive) continually review all of the Department’s operations and headcount to identify opportunity for savings including civilianization. It is, therefore, not accurate to characterize our efforts to civilianize as anything other than continued and organized.”

Auditor Comment: During the audit Department officials stated that from time to time the Commissioner requested that specific work units be reviewed regarding overtime and the possibility of civilianizing certain administrative positions filled by sanitation workers. We requested documentation to reflect these civilianization efforts, but the Department never provided us with any documents or reports that showed that the Bureau of Planning and Budget regularly reviewed and identified uniformed positions that could be civilianized.

Department of Sanitation Response: “Not mentioned in the report is the fact that, in fiscal year 2003, we civilianized 32 positions in seven of our Marine Transfer Stations and 47 Sanitation Police positions in our Enforcement Unit. We also identified 10 positions in our Community Action Center for civilianization. These are the same 10 Sanitation workers in the Bureau of Public Information and Community Affairs that the report recommended to be replaced by Community Associates.”

Auditor Comment: Contrary to the Department’s assertion, we credited the agency with civilianizing a total of 49 Sanitation Police positions in the Enforcement Unit (see page 16). Furthermore, as discussed on page 22, we noted that the 10 Sanitation Workers assigned to the Department’s Community Action Center were to be reassigned to field operations because the Action Center was being merged with the City’s new 311 call center. However, according to Department officials, as of April 30, 2003, these 10 sanitation employees had not been reassigned. Moreover, we did not mention the 32 positions civilianized in its Marine Transfer Stations since this unit was not one of the 16 units we reviewed during this audit.

Objectives

The objectives of this audit were to: (1) determine the number of uniformed personnel that the Department of Sanitation assigned to civilian positions; and (2) calculate the annual cost savings that the Department of Sanitation could achieve by civilianizing positions currently held by uniformed personnel.

Scope and Methodology

This audit reviewed all work units within the Department of Sanitation where uniformed employees are assigned. We identified 16 work units where 446 uniformed personnel are assigned to support or administrative positions. We decided to review opportunities for savings from civilianizing positions in all 16 of these units. We focused on support or administrative positions filled by uniformed personnel in the titles of Sanitation Worker and Sanitation

Supervisor. In a few instances we also considered positions filled by uniformed personnel in the title of GS-Level 1 for civilianization.

To gain an understanding of the Department of Sanitation's organizational structure and the nature of the various work units where civilian employees could be assigned, we met with representatives from the Human Resources and Personnel Management Divisions. We obtained a copy of the Department's *Payroll Distribution Number Manual*, dated June 2001, that lists each of the Department work units and their locations. We also obtained the *Monthly Position Ceiling Report* for April 2002, which details the authorized (budgeted) and actual headcount of both uniformed and civilian employee title codes in each of the Department work units. We reviewed the Department's *Annual Report 2001*. We used information from these sources to identify predominantly support and administrative units where uniformed employees are assigned.

To gain an understanding of the Department's primary field operations, we visited three of the seven borough offices and three of the 59 district offices. The district offices are generally in garages from which sanitation collection trucks and other equipment are dispatched for refuse collection, street cleaning, etc. During these visits, we interviewed various borough and district officials and personnel to ascertain whether uniformed personnel were assigned to perform support or administrative functions at the field sites.

We reviewed the New York City Executive Budget for Fiscal Year 2003 and noted the authorized headcount and allocation of budgeted personnel throughout the Department's responsibility centers. We also obtained information from the City Payroll Management System (PMS) detailing all work units within the Department where uniformed personnel were assigned as of September 11, 2002, along with the employees' names and annual base salaries. We obtained the same information from PMS as of December 13, 2002, to identify any personnel assignment changes that had been made and to ensure that we used up-to-date information in our analysis.

From the PMS data, we identified work units that had uniformed personnel assigned. We then met with officials from each of these units to assess unit functions and the roles of uniformed personnel in each unit. Each unit provided us with personnel rosters identifying the uniformed and civilian personnel assigned to the unit. We also were provided job descriptions for the positions in the units filled by uniformed personnel.

We obtained from the Department of Citywide Administrative Services the job descriptions for each of the three uniformed civil service titles used by the Department of Sanitation. We evaluated these job descriptions along with the prevailing collective bargaining agreements covering these civil service positions provided to us by the City Office of Labor Relations.

To determine whether a position within a particular work unit at the Department of Sanitation could be civilianized, we considered the following questions:

- Does the position involve duties that are directly related to sanitation activities per se?

- Does the position require the special skills of a trained uniformed sanitation employee?

In general, we considered a position suitable for civilianization if the answer to both of these questions was “no.”

Based upon our evaluation, we excluded all positions filled by uniformed employees with the civil service classification of GS-SCA and GS-Managerial from our analysis. With certain exceptions, we also excluded positions filled by uniformed employees with the title of GS-Level 1 from consideration for civilianization. We considered primarily the uniformed titles of Sanitation Worker and Sanitation Supervisor in our analysis.

To determine which civilian job titles fit the functions we considered suitable for civilian employees, we reviewed the descriptions of civilian job titles used by the Department of Sanitation and the list of active job titles maintained by the Department of Citywide Administrative Services. We obtained the fringe benefit rates for uniformed officers from the Office of Management and Budget (OMB), Office of Budget Review, and the collective bargaining agreements for uniformed sanitation employees. Using this information, along with information obtained from PMS, we calculated the annual salary, uniform allowance, and fringe benefit costs for the uniformed employees in positions we considered suitable for civilianization. We also calculated the average annual salaries for comparable civilian job titles, based on salary ranges for these titles listed in the Fiscal Year 2003 Executive Budget, and the civilian fringe benefit rates, also supplied by OMB.²

To determine whether the Department of Sanitation could derive cost savings by employing a civilian in a support or administrative position now filled by a uniformed employee, we compared the uniformed employee’s current annual salary and fringe benefit costs to the average annual salary and fringe benefit costs of a civilian employee qualified to perform comparable duties.³ If we determined that the Department of Sanitation could derive cost savings by assigning a civilian employee to a support or administrative position filled by uniformed employee, we concluded that the position should be civilianized.

This audit was conducted in accordance with Generally Accepted Government Auditing Standards (GAGAS) and included tests of records and other auditing procedures considered necessary. This audit was performed in accordance with the City Comptroller’s audit responsibilities as set forth in Chapter 5, § 93, of the New York City Charter.

Discussion of Audit Results

The matters covered in this report were discussed with Department officials during and at the conclusion of this audit. A preliminary draft report was sent to Department officials on March 20, 2003, and was discussed at an exit conference held on April 11, 2003. We submitted a

² Fringe benefit costs include the employer portion of Social Security and Medicare taxes, employer pension contributions, employer health and welfare fund contributions, and Workers’ Compensation insurance.

³ Overtime pay, longevity increments, and shift differentials were not included in the calculation of the annual salary and fringe benefit costs. Uniform allowance was included in the annual base salary amount.

draft report to Department officials with a request for comments. We received a written response from Department officials on April 30, 2003.

The Department agreed with both of the audit recommendations, stating: “We will begin to civilianize some positions in our Supervised Sick Leave Unit and assess the impact of this civilianization. We will continue to monitor our job requirements in the coming years, and when the opportunity arises, we will replace uniformed personnel with civilians in titles whose duties, in our judgement, match as closely as possible those of the uniformed staff’s.”

The full text of the Department’s comments appears as an addendum to this report.

FINDINGS AND RECOMMENDATIONS

The Department of Sanitation could save \$5,765,607 annually if 313 positions identified in this audit, now filled by uniformed employees, were filled instead by civilian civil service employees. These 313 positions—filled by 242 Sanitation Worker, 63 Supervisor, and eight GS-Level 1 employees—were identified as having functions not directly related to sanitation activities per se and, in our determination, do not require the skills of a trained uniformed sanitation employee. The Department's overall workforce could be maintained at its current levels if these uniformed personnel were assigned to positions directly related to sanitation activities as uniformed personnel in those positions retire or as the positions become vacant.

Table I
Cost Savings from Civilianizing 313 Positions in Department of Sanitation Units

Referenced Tables	(1) DIVISION/Bureau or Unit	(2) Number of Positions Filled by Uniformed Employees	(3) Number Of Uniformed Positions That Should be Civilianized	(4) Annual Uniformed Salary & Fringe Benefits of Positions That Should be Civilianized	(5) Annual Civilian Salary & Fringe Benefits of Comparable Civilian Positions	(6) Cost Savings (Col. 4 less Col. 5)
BUREAU OF CLEANING AND COLLECTION						
II	BCC Headquarters	94	37	\$2,458,178	\$1,702,934	\$755,244
III	Field Inspection Audit Team	9	8	\$799,686	\$411,563	\$388,123
IV	Derelict Vehicles Unit	21	20	\$1,321,109	\$701,666	\$619,443
V	Personnel Management Division	11	5	\$330,424	\$253,193	\$77,231
VI	Safety and Training	35	32	\$2,222,969	\$1,745,059	\$477,910
VII	Enforcement Unit	77	37	\$2,518,550	\$1,301,055	\$1,217,495
VIII	Superintendent Clerks	92	92	\$5,640,610	\$5,224,222	\$416,388
	Total	339	231	\$15,291,526	\$11,339,692	\$3,951,834
BUREAU OF WASTE DISPOSAL						
IX	Operational Control Office	17	15	\$978,100	\$758,703	\$219,397
X	Export Contract Management Unit	3	3	\$215,723	\$125,217	\$90,506
	Total	20	18	\$1,193,823	\$883,920	\$309,903
DIVISION OF ADMINISTRATION AND FISCAL SERVICES						
XI	Medical Division	15	13	\$1,005,469	\$704,113	\$301,356
XII	Bureau of Planning and Budget	25	21	\$1,733,708	\$1,181,629	\$552,079
	Total	40	34	\$2,739,177	\$1,885,742	\$853,435
BUREAU OF PUBLIC INFORMATION AND COMMUNITY AFFAIRS						
XIII	Bureau of Public Info & Cmty Affs	11	11	\$624,495	\$481,137	\$143,358
BUREAU OF LEGAL AFFAIRS						
XIV	Department of Advocate	2	2	\$150,479	\$70,328	\$80,151
EXECUTIVE DIVISION/CHIEF OF STAFF						
XV	Environmental Enforcement Unit	9	4	\$240,545	\$140,655	\$99,890
XVI	Permit Inspection Unit	22	10	\$619,989	\$351,636	\$268,353
	Total	31	14	\$860,534	\$492,291	\$368,243
BUREAU OF SUPPORT OPERATIONS						
XVII	Bureau of Building Maintenance	3	3	\$177,855	\$119,172	\$58,683
	Grand Total	446	313	\$21,037,889	\$15,272,282	\$5,765,607

In this report, we present the results of our audit on a unit-by-unit basis. None of the positions currently filled by uniformed personnel that we identified as being suitable for civilianization required that the position be filled by a uniformed employee. However, throughout the audit Department officials repeated several points as justification for staffing these positions with uniformed personnel.

One argument made by Department officials is that uniformed personnel assigned to civilian-type functions possess experience with departmental procedures and sanitation activities that civilian employees generally do not have. Therefore, they maintain that uniformed employees are generally more qualified and capable than most civilian employees to handle the support or administrative positions currently filled by uniformed personnel.

Clearly, as with any organization, there are advantages to staffing a position with an experienced individual. However, the Department could hire a qualified civilian to fill a support or administrative position currently filled by uniformed personnel and address the civilian's lack of departmental experience by providing appropriate training and supervision.

Another point frequently raised by Department officials during the audit is that uniformed employees provide the Department greater flexibility than do civilian employees. The officials argue that uniformed employees can be asked to do almost any legal task relevant to the Department of Sanitation mission, whereas civilians can be asked to perform only those functions that are consistent with their job descriptions. The Department could alleviate most of these concerns by carefully hiring an appropriate mix of civilian employees and using a wide variety of job descriptions.

An additional point made by Department officials is that some uniformed personnel (Sanitation Workers and Sanitation Supervisors) assigned to positions we considered suitable for civilianization may be redeployed to snow duties in the event of a snow emergency or assigned, if necessary, to cleaning and collection activities. However, for the most part, the uniformed personnel assigned to positions we considered suitable for civilianization are permanently assigned to their positions. The Department does not maintain statistics showing the extent to which these uniformed Sanitation Workers and Supervisors are redeployed; therefore, we could not evaluate the validity of the Department's argument.

Department Response: The Department stated: "We cannot over-emphasize the importance of experience in departmental procedures and functional flexibility of our uniformed personnel assigned to administrative duties. We believe these attributes are what makes them more beneficial to the agency." The Department also asserted that savings were not likely be achieved through civilianizing administrative positions, stating: "While certain civilian positions may have some of the duties performed by uniformed staff, no one civilian title can cover all duties routinely assigned to uniformed personnel. You mentioned that we should get the proper mix of civilian titles to cover the wide range of duties performed by the uniform personnel. However, you fail to admit that in small units 'the proper mix' might require an increase in the number of positions, which of course, increases the cost of the function."

Auditor Comment: We disagree with the Department's general contention that "sanitation experience" per se is a prerequisite for individuals to competently perform in

many of the Department's administrative functions. It is our belief that a civilian is capable of learning departmental procedures and other information necessary to perform administrative duties competently, despite the lack of hands-on sanitation collection and cleaning experience

Regarding the Department's argument in favor of the flexibility of uniformed personnel to perform many functions, as stated in the report, the Department maintains no statistics to reflect the frequency with which it redeploys uniformed personnel to other assignments. Therefore, we could not evaluate how often the redeployment occurs nor the potential costs involved with keeping uniformed personnel in administrative positions.

Although this audit reviewed all work units within the Department of Sanitation where uniformed employees are assigned, we should note that positions in the Department suitable for filling with civilian employees are not limited to those identified in this audit. Indeed, we believe that the Department of Sanitation should review all of its work units to identify additional positions now filled by uniformed personnel that could be filled by civilian civil service employees. The following sections of this report present the audit's specific findings for each of the 16 work units summarized in Table I.

Bureau of Cleaning and Collection

The Bureau of Cleaning and Collections (BCC) is the Department of Sanitation's largest organizational division and has the greatest concentration of uniformed personnel in the agency. As of December 13, 2002, BCC employed approximately 7,200 (94.7%) of the Department's 7,600 uniformed staff. BCC directs, supervises, controls, and coordinates street cleaning, refuse collection, and snow removal. It provides regular, scheduled, curbside and containerized refuse collection; it operates some 5,000 trucks to collect approximately 60,000 tons of refuse weekly.

BCC has a number of organizational bureaus and units that carry out sanitation operations, administrative, and support functions, or a combination thereof. Both uniformed and civilian personnel are assigned to positions in these units. The following discussions address the BCC work units where we identified positions filled by uniformed personnel that could be filled by civilian employees.

BCC Headquarters

BCC Headquarters coordinates the Department's sanitation cleaning, collection, and field operations. It also operates a warehouse for BCC equipment and supplies and interacts with the City Trade Waste Commission. BCC Headquarters has 111 employees—94 uniformed and 17 civilian—assigned to its various work units, including the Bureau of Operations, the Bureau of Cleaning, the Collection Unit, the Trade Waste Commission Unit, the BCC Warehouse, and the Office of the Special Assistant to the First Deputy Commissioner for Cleaning and Collections.

The BCC Bureau of Operations (BOO) is the Department's primary communication center. It monitors and maintains the Department's citywide radio communications center that operates 24 hours a day, seven days a week to maintain communications between BCC

Headquarters and the Department field sites. It coordinates snow-fighting plans and schedules for the entire City and works with the Bureau of Motor Equipment to schedule the maintenance and assess future needs of the fleet. The Bureau also oversees all Department facilities, administers the BCC expense budget, controls inventories of fuel, lubricants, tools, and supplies for citywide use.

Uniformed Sanitation Workers and Supervisors assigned to positions within BOO perform a variety of administrative and support functions. For instance, they maintain a database and manual records that track household appliances for chlorofluorocarbon gas removal. They also track gas cards assigned to agency personnel, operate the Department's message center, change tires, refuel and wash vehicles assigned to personnel at BCC Headquarters, move office furniture and perform housekeeping duties at BCC Headquarters, transport equipment, and pick up emergency purchases from vendors.

The BCC Bureau of Cleaning (BOC) assists in the administration and operation of programs to control street litter. BOC deploys 250 mechanical brooms to sweep streets and 400 basket trucks to empty 25,000 litter baskets weekly. BOC also administers street cleaning programs for parades and various special events; and it maintains and tracks neighborhood cleanliness ratings for the Mayor's Office of Operations *Project Scorecard* program, which rates the level of cleanliness of most streets in the 59 sanitation districts.

The Sanitation Workers assigned to the BOC assist in planning for parades and various special events. This includes, scheduling personnel and equipment, and reviewing special event and parade permits. They also prepare and distribute reports and maintain expense records. The Sanitation Supervisors assigned to the unit direct cleaning resources. They also procure tools, street litter baskets, office equipment and furniture, and supplies for the unit, maintain inventory records and personnel records, and oversee the administrative activities of the office.

The BCC Collection Unit plans, directs, and coordinates the recycling collection program. The three Sanitation Workers assigned to the unit perform primarily administrative duties. For instance they process and review agreements with neighborhood associations regarding private streets and with owners of private drives that are accessed by Department vehicles. They also prepare and track information pertaining to collection and recycling operations and maintain monthly reports.

In addition to these work units, BCC Headquarters has three uniformed Sanitation Workers assigned to the Trade Waste Commission Unit to investigate private carters regarding illegal disposal of construction contractor waste; two Sanitation Workers and one Supervisor assigned to the BCC Warehouse to perform general stocking and inventory duties; one Sanitation Worker and one Supervisor assigned to the Office of the Special Assistant to the Deputy Commissioner to perform secretarial and administrative duties; and one Supervisor assigned to assist the Director of BCC.

As of December 13, 2002, there were 37 uniformed employees assigned to positions in BCC Headquarters work units that could be civilianized, including 17 Sanitation Workers and six Supervisors in BOO; one Sanitation Worker and one Supervisor in BOC; three Sanitation Workers in the Collection Unit; two Sanitation Workers and one Supervisor in the BCC Warehouse; three Supervisors assigned to Trade Waste Commission Unit; one Sanitation Worker and one Supervisor assigned to the Office of the Special Assistant to the Deputy Commissioner,

and one Supervisor assigned to assist the Director of BCC. The annual salary and fringe benefit costs for these 37 uniformed employees, shown in Table II following, totaled \$2,458,178. When we compared this amount to the average annual salary and fringe benefits of comparable civilian titles, we concluded that the Department could save \$755,244 annually by civilianizing these 37 positions.

Table II
Cost Savings from Civilianizing 37 Positions in the
BCC Headquarters

(1) Number of Positions	(2) Uniformed Title	(3) Uniformed Employee Average Salary & Fringe Benefits	(4) Total Uniformed Salary & Fringe Benefits (Col. 1 x Col. 3)	(5) Comparable Civilian Titles	(6) Civilian Average Salary & Fringe Benefits	(7) Total Civilian Salary & Fringe Benefits (Col. 1 x Col. 6)	(8) Cost Savings (Col. 4 less Col. 7)
17	Sanitation Worker (BOO)	\$60,010.41	\$1,020,177	Clerical Associate	\$41,925.59	\$712,735	\$307,442
6	Supervisors (BOO)	\$79,304.17	\$475,825	Prin. Administrative Associate.	\$56,785.00	\$340,710	\$135,115
1	Sanitation Worker (BOC)	\$65,244.00	\$65,244	Clerical Associate	\$41,926.00	\$41,926	\$23,318
1	Supervisor (BOC)	\$85,235.00	\$85,235	Purchase Agent	\$58,323.00	\$58,323	\$26,912
3	Sanitation Worker (Coll. Unit)	\$59,285.00	\$177,855	Clerical Associate	\$41,925.67	\$125,777	\$52,078
3	Supervisors (Trade Waste Comm. Unit)	\$80,991.33	\$242,974	Investigator	\$46,266.33	\$138,799	\$104,175
2	Sanitation Workers (Warehouse)	\$56,305.50	\$112,611	Stock Worker	\$38,918.00	\$77,836	\$34,775
1	Supervisor (Warehouse)	\$85,235.00	\$85,235	Supervisor of Stock Workers	\$52,935.00	\$52,935	\$32,300
1	Sanitation Worker (Off. Spec. Asst. to Dep. Comm.)	\$47,367.00	\$47,367	Secretary	\$40,323.00	\$40,323	\$7,044
1	Supervisor (Off. Spec. Asst. to Dep. Comm.)	\$73,152.00	\$73,152	Prin. Administrative Associate.	\$56,785.00	\$56,785	\$16,367
1	Supervisor (Assistant to BCC Director)	\$72,503.00	\$72,503	Prin. Administrative Associate.	\$56,785.00	\$56,785	\$15,718
37	Total		\$2,458,178			\$1,702,934	\$755,244

Field Inspection and Audit Team

The BCC Field Inspection and Audit Team (FIAT) monitors sanitation district administration and ensures district compliance with Department operational procedures. The unit conducts payroll, operational, and procedural audits of Department field sites (garages, borough offices, etc.) where uniformed personnel are assigned. Ninety percent of these audits are payroll audits. For uniformed personnel, FIAT also investigates alleged violations of the Department code of conduct, instructs uniformed personnel on proper Department procedures, and when necessary, institutes disciplinary charges against uniformed personnel who violate such procedures.

Department officials stated that, although there is no requirement, the positions in FIAT have always been filled by uniformed employees. Uniformed employees are preferred over civilians to staff positions in FIAT because of the experience with sanitation activities that civilians do not possess. The uniformed employees currently assigned to FIAT have 12 to 15 years of experience with sanitation activities and departmental procedure. Therefore, Department officials believe that the unit is well suited for auditing the uniformed personnel payroll and timekeeping systems.

Clearly, there are advantages to staffing a position with an experienced individual. However, the Department could hire qualified civilians to fill positions in the unit currently filled by uniformed personnel and address the civilian's lack of departmental experience by providing appropriate training and supervision.

As of December 13, 2002, the FIAT staff consisted of nine uniformed (one Supervisor, seven GS-Level 1, and one GS-Level 2—FIAT's Director) and five civilian employees. We determined that eight of the positions filled by uniformed personnel should be civilianized. As shown in Table III below, the annual salary and fringe benefit costs for these eight uniformed employees totaled \$799,686. When we compared this amount to the average annual salary and fringe benefits of comparable civilian titles, we concluded that the Department could save \$388,123 annually by civilianizing these eight positions.

Table III
Cost Savings from Civilianizing Eight Positions in the
Field Inspection and Audit Team

(1) Number of Positions	(2) Uniformed Title	(3) Uniformed Employee Average Salary & Fringe Benefits	(4) Total Uniformed Salary & Fringe Benefits (Col. 1 x Col. 3)	(5) Comparable Civilian Titles	(6) Civilian Average Salary & Fringe Benefits	(7) Total Civilian Salary & Fringe Benefits (Col. 1 x Col. 6)	(8) Cost Savings (Col. 4 less Col. 7)
1	Supervisor	\$85,235.00	\$85,235	Associate Staff Analyst	\$71,796.00	\$71,796	\$13,439
7	GS-Level I	\$102,064.42	\$714,451	Accountant	\$48,538.14	\$339,767	\$374,684
8	Total		\$799,686			\$411,563	\$388,123

Derelict Vehicle Operations Unit

The BCC Derelict Vehicle Operations (DVO) unit monitors and coordinates the reporting and removal of derelict vehicles from City streets and highways. Specifically, DVO coordinates the referral of information reported by field supervisors about abandoned and derelict vehicles. Abandoned vehicles simply lack license plates, and are referred to the Police Department for removal; derelict vehicles are tagged by sanitation personnel and referred to City-contracted vendors for removal.

As of December 13, 2002, DVO had a total of 33 employees, including 21 uniformed sanitation and 12 civilian employees. We identified 20 positions filled by uniformed employees (12 Sanitation Workers and eight Supervisors) that could be civilianized. As shown in Table IV below, the annual salary and fringe benefit costs for these 20 uniformed employees totaled \$1,321,109. When we compared this amount to the average annual salary and fringe benefits of comparable civilian titles, we concluded that the Department could save \$619,443 annually by civilianizing these 20 positions.

Table IV
Cost Savings from Civilianizing 20 Positions in the
Derelict Vehicle Operations Unit

(1) Number of Positions	(2) Uniformed Title	(3) Uniformed Employee Average Salary & Fringe Benefits	(4) Total Uniformed Salary & Fringe Benefits (Col. 1 x Col. 3)	(5) Comparable Civilian Titles	(6) Civilian Average Salary & Fringe Benefits	(7) Total Civilian Salary & Fringe Benefits (Col. 1 x Col. 6)	(8) Cost Savings (Col. 4 less Col. 7)
12	Sanitation Worker	\$58,136.42	\$697,637	Sanitation Compliance Agent	\$35,083.33	\$421,000	\$276,637
8	Supervisor	\$77,934.00	\$623,472	Sanitation Compliance Agent	\$35,083.25	\$280,666	\$342,806
20	Total		\$1,321,109			\$701,666	\$619,443

Personnel Management Division

The BCC Personnel Management Division (PMD) assists the Department's First Deputy Commissioner in the hiring, allocating, and promoting of both uniformed and civilian personnel. PMD also works closely with the Bureau of Human Resources regarding these matters and all other personnel actions regarding Department employees.

As of December 13, 2002, the PMD had a total of 18 employees, including 11 uniformed sanitation and seven civilian employees. We identified five positions filled by uniformed employees (four Sanitation Workers and one GS-Level 1) that could be civilianized. As shown in Table V below, the annual salary and fringe benefit costs for these five uniformed employees totaled \$330,424. When we compared this amount to the average annual salary and fringe benefits of comparable civilian titles, we concluded that the Department could save \$77,231 annually by civilianizing these five positions.

Table V
Cost Savings from Civilianizing Five Positions in the
Personnel Management Division

(1) Number of Positions	(2) Uniformed Title	(3) Uniformed Employee Average Salary & Fringe Benefits	(4) Total Uniformed Salary & Fringe Benefits (Col. 1 x Col. 3)	(5) Comparable Civilian Titles	(6) Civilian Average Salary & Fringe Benefits	(7) Total Civilian Salary & Fringe Benefits (Col. 1 x Col. 6)	(8) Cost Savings (Col. 4 less Col. 7)
1	GS-Level 1	\$85,327.00	\$85,327	Staff Analyst	\$55,772.00	\$55,772	\$29,555
2	Sanitation Worker	\$57,304.50	\$114,609	Clerical Associate	\$41,925.50	\$83,851	\$30,758
2	Sanitation Worker	\$65,244.00	\$130,488	Prin. Administrative Assoc	\$56,785.00	\$113,570	\$16,918
5	Total		\$330,424			\$253,193	\$77,231

Division of Safety and Training

The BCC Division of Safety and Training is responsible for all training, both administrative and operational, to ensure that employees possess the knowledge and skills to perform their jobs safely and effectively in a hazard-free work place. The Division consists of the Safety Unit and the Training Unit. The Safety Unit provides defensive driving courses given by an accredited Safety Officer. The unit also monitors the licenses of all Department employees and is authorized to issue complaints, carry out suspensions, and place employees on unpaid leave for losing their driving privileges. It is also responsible for monitoring operations, facilities, and employee performance to ensure that services are delivered without risk to the health and safety of employees and the public.

The Training Unit conducts job-related training and develops programs to help employees perform better in their current job and prepare themselves for additional responsibilities. For example, the unit provides classes for new hires and promotions. Each year the newest garage Supervisors and Sanitation Workers receive refresher training in snow removal policies and procedures, as well as in equipment operations.

As of December 13, 2002, the Division of Safety and Training had a total of 43 employees, including 35 uniformed sanitation and eight civilian employees. We identified 32 positions filled by uniformed employees (17 Sanitation Workers and 15 Supervisors) that could be civilianized. As shown in Table VI below, the annual salary and fringe benefit costs for these 32 uniformed employees totaled \$2,222,969. When we compared this amount to the average annual salary and fringe benefits of comparable civilian titles, we concluded that the Department could save \$477,910 annually by civilianizing these 32 positions.

Table VI
Cost Savings from Civilianizing 32 Positions in the
Division of Safety and Training

(1) Number of Positions	(2) Uniformed Title	(3) Uniformed Employee Average Salary & Fringe Benefits	(4) Total Uniformed Salary & Fringe Benefits (Col. 1 x Col. 3)	(5) Comparable Civilian Titles	(6) Civilian Average Salary & Fringe Benefits	(7) Total Civilian Salary & Fringe Benefits (Col. 1 x Col. 6)	(8) Cost Savings (Col. 4 less Col. 7)
3	Sanitation Worker	\$59,951.00	\$179,853	Motor Vehicle Operator	\$39,724.00	\$119,172	\$60,681
14	Sanitation Worker	\$60,421.79	\$845,905	Staff Analyst	\$56,065.07	\$784,911	\$60,994
15	Supervisor	\$79,814.07	\$1,197,211	Staff Analyst	\$56,065.07	\$840,976	\$356,235
32	Total		\$2,222,969			\$1,745,059	\$477,910

Enforcement Division

The Enforcement Division is responsible for monitoring compliance with administrative, recycling, and health laws governing the maintenance of clean streets, illegal dumping, and the proper storage and disposal of waste and recyclable materials by both residents and commercial establishments. The division consists of Sanitation Police Officers and Enforcement Agents. Sanitation Police Officers are generally uniformed Sanitation Workers and Supervisors who are fully trained peace officers and carry side arms. Enforcement Agents are civilians who undergo a comprehensive classroom and field training program, but do not have the authority to carry side arms.

According to Enforcement Division officials, on December 1, 2002, 49 Sanitation Police Officer positions filled by uniformed employees were civilianized. By our calculations, this resulted in estimated cost savings of \$1,612,844 for the Department.

Based on our review, as of December 13, 2002, the Enforcement Division employed 204 employees, including 77 uniformed and 127 civilian employees. We determined that the Department could potentially civilianize 74 of 77 position filled by uniformed employees. We recognize the Department's need to staff positions in the Enforcement Division with appropriately trained and experienced employees to ensure that the Division can effectively monitor compliance with administrative, recycling, and health laws. Therefore, the Department should consider civilianizing half (37) of the 74 uniformed positions we identified with civilian employees in the title of Sanitation Enforcement Agent and require the same peace officer training and status for these 37 civilian Enforcement Agents as it currently requires of uniformed employees in the position of Sanitation Police Officer. Thereafter, the Department could measure the effectiveness of civilianizing these positions and determine the appropriateness for civilianizing the remaining 37 positions in the Division filled by uniformed employees. In so doing, the Department could realize potential savings.

The annual salary and fringe benefit costs for the 37 uniformed employees (shown in Table VII) in positions that the Department should consider for civilianization, totaled \$2,518,550. When we compared this amount to the average annual salary and fringe benefits of comparable civilian titles, we concluded that the Department could save \$1,217,495 annually by civilianizing these 37 positions.

Table VII
Cost Savings from Civilianizing 37 Positions in the
Enforcement Division

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Number of Positions	Uniformed Title	Uniformed Employee Average Salary & Fringe Benefits	Total Uniformed Salary & Fringe Benefits (Col. 1 x Col. 3)	Comparable Civilian Titles	Civilian Average Salary & Fringe Benefits	Total Civilian Salary & Fringe Benefits (Col. 1 x Col. 6)	Cost Savings (Col. 4 less Col. 7)
9	Supervisor	\$80,830.11	\$727,471	Sanitation Enforcement Agent	\$35,163.67	\$316,473	\$410,998
28	Sanitation Worker	\$63,967.09	\$1,791,079	Sanitation Enforcement Agent	\$35,163.66	\$984,582	\$806,497
37	Total		\$2,518,550			\$1,301,055	\$1,217,495

Superintendent Clerks

The BCC has 92 uniformed Sanitation Workers assigned to the position of Superintendent's Clerk throughout its various district and borough offices and garages. These positions could be filled by civilian civil service employees. The functions of a Superintendent's Clerk are clerical in nature. The clerk assists the Superintendent in the planning and execution of daily activities, such as maintaining and updating the entries on the office "operations board" and filling out daily personnel and activity reports. The clerk also maintains the records and files of employees assigned to a district, and acts as the liaison between the Superintendent and BCC Headquarters.

As of December 13, 2002, the annual salary and fringe benefit costs for these 92 uniformed employees totaled \$5,640,610 (shown in Table VIII). When we compared the average salaries and fringe benefits of these 92 uniformed employees with those of civilians with comparable positions, we concluded that the Department could save \$416,388 by civilianizing these 92 positions.

Table VIII
Cost Savings from Civilianizing 92 Positions of
Superintendent's Clerk

(1) Number of Positions	(2) Uniformed Title	(3) Uniformed Employee Average Salary & Fringe Benefits	(4) Total Uniformed Salary & Fringe Benefits (Col. 1 x Col. 3)	(5) Comparable Civilian Titles	(6) Civilian Average Salary & Fringe Benefits	(7) Total Civilian Salary & Fringe Benefits (Col. 1 x Col. 6)	(8) Cost Savings (Col. 4 less Col. 7)
92	Sanitation Worker	\$61,310.98	\$5,640,610	Prin. Administrative Associate I	\$56,785.02	\$5,224,222	\$416,388

Bureau of Waste Disposal

The Bureau of Waste Disposal (BWD) is responsible for overseeing the engineering, remediations, closure construction, and environmental management of the Freshkills Landfill on Staten Island. It also oversees the Department's export of residential and institutional waste, including the oversight of the transfer stations through which solid waste is handled for out-of-City disposal. The following discussions address the BWD units where we identified positions filled by uniformed personnel that could be filled by civilian employees.

Operational Control Office

The BWD Operational Control Office (OCO) primarily conducts support and administrative functions for the BWD. Uniformed employees assigned to OCO perform various clerical functions. Supervisors assigned to OCO coordinate schedules for the 59th Street transfer station, prepare overtime reports, and maintain work schedules, time books, incident reports, teletype logs, and daily hazardous material records. Sanitation Workers assigned to the unit perform various clerical functions, such as tracking security personnel, maintaining records of all scales at export and recycling vendor sites, maintaining preventive maintenance schedules for all vehicles assigned to BWD Headquarters and the Export Unit, and compiling data for closing and resuming operations at all export facilities. Furthermore, according to BWD officials, the Sanitation Workers assigned to the OCO are used to perform housekeeping and messenger duties, and whatever else the unit requires.

As of December 13, 2002, the OCO had a total of 23 employees, including 17 uniformed sanitation and 6 civilian employees. We identified 15 positions filled by uniformed employees (eight Sanitation Workers and seven Supervisors) that could be civilianized. The annual salary and fringe benefit costs for these 15 uniformed employees (shown in Table IX) totaled \$978,100. When we compared this amount to the average annual salary and fringe benefits of comparable civilian titles, we concluded that the Department could save \$219,397 annually by civilianizing these 15 positions.

Table IX
Cost Savings from Civilianizing 15 Positions in the
Operational Control Office

(1) Number of Positions	(2) Uniformed Title	(3) Uniformed Employee Average Salary & Fringe Benefits	(4) Total Uniformed Salary & Fringe Benefits (Col. 1 x Col. 3)	(5) Comparabl e Civilian Titles	(6) Civilian Average Salary & Fringe Benefits	(7) Total Civilian Salary & Fringe Benefits (Col. 1 x Col. 6)	(8) Cost Savings (Col. 4 less Col. 7)
7	Supervisors	\$77,362.43	\$541,537	Associate Accountant	\$60,471.14	\$423,298	\$118,239
8	Sanitation Worker	\$54,570.38	\$436,563	Clerical Associate	\$41,925.63	\$335,405	\$101,158
15	Total		\$978,100			\$758,703	\$219,397

Export Contract Management Unit

The BWD Export Contract Management Unit (ECMU) is responsible for overseeing and administering the various contracts with private transfer stations through which the City's residential and institutional waste are exported for out-of-City disposal. According to BWD officials, two of the Sanitation Workers assigned to the unit perform minor clerical work, general housekeeping duties, and deliver messages and packages from the transfer stations to the main office. The uniformed Supervisor is mainly in charge of maintaining schedules for all personnel assigned to the Weigh Transfer Stations.

As of December 13, 2002, the ECMU had a total of 22 employees, including three uniformed and 19 civilian employees. We determined that the three positions filled by uniformed employees (two Sanitation Workers and one Supervisor) could be civilianized. The annual salary and fringe benefit costs for these three uniformed employees (shown in Table X) totaled \$215,723. When we compared this amount to the average annual salary and fringe benefits of comparable civilian titles, we concluded that the Department could save \$90,506 annually by civilianizing these three positions.

Table X
Cost Savings from Civilianizing Three Positions in the
Export Contract Management Unit

(1) Number of Positions	(2) Uniformed Title	(3) Uniformed Employee Average Salary & Fringe Benefits	(4) Total Uniformed Salary & Fringe Benefits (Col. 1 x Col. 3)	(5) Comparable Civilian Titles	(6) Civilian Average Salary & Fringe Benefits	(7) Total Civilian Salary & Fringe Benefits (Col. 1 x Col. 6)	(8) Cost Savings (Col. 4 less Col. 7)
1	Supervisor	\$85,235.00	\$85,235	Prin. Administrative Associate	\$56,785.00	\$56,785	\$28,450
2	Sanitation Worker	\$65,244.00	\$130,488	Attendant	\$34,216.00	\$68,432	\$62,056
3	Total		\$215,723			\$125,217	\$90,506

The Division of Administration and Fiscal Services

The Division of Administration and Fiscal Services develops and monitors the Department of Sanitation's financial plan, provides and ensures adequate controls over financial and human resources, analyzes and recommends strategies to improve the Department's financial position, promotes technology to improve the information quality and customer service, and provides other support services to other bureaus. The following discussions address the Division's units where we identified positions filled by uniformed personnel that could be filled by civilian employees.

Medical Division

The Medical Division conducts pre-employment exams, monitors medical treatment resulting from line-of-duty injuries, and manages the Employee Assistance Unit. The Division also oversees the Department's Sick Leave Clinic to ensure that the rules and regulations of medical leave are not abused.

As of December 13, 2002, the Medical Division had a total of 70 employees, including 15 uniformed sanitation employees and 55 civilian employees. We determined that 13 positions filled by uniformed employees (12 Supervisors and one Sanitation Worker) could be civilianized. The Supervisors assigned to the Division enforce the Department medical leave policies and code of conduct, monitor uniformed employees on medical or sick leave to ensure compliance with Department medical leave policies, and initiate complaints against employees who fail to adhere to those policies. One Sanitation Worker is assigned to the clinic to compile paperwork and verify information about uniformed personnel who violate medical leave policies.

The annual salary and fringe benefit costs for these 13 uniformed employees (shown in Table XI) totaled \$1,005,469. When we compared this amount to the average annual salary and fringe benefits of comparable civilian titles, we concluded that the Department could save \$301,356 annually by civilianizing these 13 positions.

Table XI
Cost Savings from Civilianizing 13 Positions in the
Medical Division

(1) Number of Positions	(2) Uniformed Title	(3) Uniformed Employee Average Salary & Fringe Benefits	(4) Total Uniformed Salary & Fringe Benefits (Col. 1 x Col. 3)	(5) Comparable Civilian Titles	(6) Civilian Average Salary & Fringe Benefits	(7) Total Civilian Salary & Fringe Benefits (Col. 1 x Col. 6)	(8) Cost Savings (Col. 4 less Col. 7)
12	Supervisors	\$78,352.08	\$940,225	Investigator (Discipline)	\$55,182.25	\$662,187	\$278,038
1	Sanitation Worker	\$65,244.00	\$65,244	Clerical Associate	\$41,926.00	\$41,926	\$23,318
13	Total		\$1,005,469			\$704,113	\$301,356

Bureau of Planning and Budget

The Bureau of Planning and Budget develops and monitors the Department's operating budget and the information the Department submits for the Mayor's Management Report. The Bureau also is one of the Department's primary liaisons to outside agencies. The Bureau is composed of 59 employees—25 uniformed and 34 civilian—assigned to its Graphic Unit, Operations Management Division, and Operational Assistance Unit.

The Graphics Unit handles the Department's printing needs, including purchasing and maintaining the equipment needed to run the unit, and coordinates the outsourcing of agency printing. The Operations Management Division (OMD) monitors, collects, and analyzes all BCC operational data pertaining to productivity, performance, equipment, refuse collection, snow removal routes, truck shifts, etc., to identify trends and develop forecasts for future needs and planning. The Operations Assistance Unit (OAU) conducts various studies and surveys as needed by the Bureau.

As of December 13, 2002, there were 21 uniformed employees assigned to positions in these three units that could be civilianized, including two Supervisors in the Graphic Unit, two Supervisors and one Sanitation Worker in OMD, and 16 Supervisors in OAU. The annual salary and fringe benefit costs for these 21 uniformed employees (shown in Table XII), totaled \$1,733,708. When we compared this amount to the average annual salary and fringe benefits of comparable civilian titles, we concluded that the Department could save \$552,079 annually by civilianizing these 21 positions.

Table XII
Cost Savings from Civilianizing 21 Positions in the
Bureau of Planning and Budget

(1) Number of Positions	(2) Uniformed Title	(3) Uniformed Employee Average Salary & Fringe Benefits	(4) Total Uniformed Salary & Fringe Benefits (Col. 1 x Col. 3)	(5) Comparable Civilian Titles	(6) Civilian Average Salary & Fringe Benefits	(7) Total Civilian Salary & Fringe Benefits (Col. 1 x Col. 6)	(8) Cost Savings (Col. 4 less Col. 7)
1	Supervisor (Graphics)	\$85,235	\$85,235	Principal Administrative Associate	\$56,785	\$56,785	\$28,450
1	Supervisor (Graphics)	\$85,235	\$85,235	Purchase Agent	\$58,323	\$58,323	\$26,912
16	Supervisor (OAU)	\$83,766	\$1,340,256	Staff Analyst	\$56,065	\$897,041	\$443,215
2	Supervisor (OMD)	\$78,869	\$157,738	Associate Accountant	\$60,246	\$120,942	\$36,796
1	Sanitation Worker (OMD)	\$65,244	\$65,244	Accountant	\$48,538	\$48,538	\$16,706
21	Total		\$1,733,708			\$1,181,629	\$552,079

The Bureau of Public Information and Community Affairs

The Bureau of Public Information and Community Affairs represents the Department of Sanitation to the media and the public-at-large. The Bureau communicates and disseminates Department information to the broadcast and print media and on the Internet. It monitors the public perception of the Department and responds to all media inquiries. The Bureau also oversees the recording of Department events and history through its Audio-Visual and Photography units; it collects news clippings and maintains a monthly video reel of video news reports.

As of December 13, 2002, the Bureau employed 13 uniformed employees (11 Sanitation Workers, one Supervisor, and one GS-Level 1) and 29 civilian employees. We identified 11 positions filled by uniformed Sanitation Workers that could be civilianized. The annual salary and fringe benefit costs for these 11 uniformed employees (shown in Table XIII), totaled \$624,495. Of those 11 Sanitation Workers, 10 were assigned to the Department of Sanitation's Community Action Center to respond to questions and provide information to the public, as well as to schedule the pickup and removal of bulk trash, and perform other tasks. One other Sanitation Worker was assigned to the Bureau as a utility support worker. His duties entail escorting members of the media to Department facilities, driving the Bureau's two specialized communication vehicles, serving as a pool driver, transporting Bureau vehicles for scheduled maintenance, and handling a variety of administrative duties.

According to Bureau officials, as of January 2003, in accordance with the Mayor's Executive Order No. 31, the duties of the Community Action Center were to be transferred to and consolidated into the new City 311 Call Center to be operated by the Department of Information Technology and Telecommunications. Accordingly, the 10 Sanitation Workers

assigned to the Community Action Center were to be reassigned to field operations. However, as of January 31, 2003, these employees had not yet been reassigned. Therefore, we maintain that the Department should civilianize these positions.

When we compared the annual salary and fringe benefit costs for the 11 uniformed employees to the average annual salary and fringe benefits of comparable civilian titles, we concluded that the Department could save \$143,358 annually by civilianizing these 11 positions.

Table XIII
Cost Savings from Civilianizing 11 Positions in the
Bureau of Public Information and Community Affairs

(1) Number of Positions	(2) Uniformed Title	(3) Uniformed Employee Average Salary & Fringe Benefits	(4) Total Uniforme d Salary & Fringe Benefits (Col. 1 x Col. 3)	(5) Comparable Civilian Titles	(6) Civilian Average Salary & Fringe Benefits	(7) Total Civilian Salary & Fringe Benefits (Col. 1 x Col. 6)	(8) Cost Savings (Col. 4 less Col. 7)
10	Sanitation Worker	\$57,712.80	\$577,128	Community Associate	\$44,141.30	\$441,413	\$135,715
1	Sanitation Worker	\$47,367.00	\$47,367	Motor Vehicle Operator	\$39,724.00	\$39,724	\$7,643
11	Total		\$624,495			\$481,137	\$143,358

Bureau of Legal Affairs

Office of Employment and Disciplinary Matters

The Office of Employment and Disciplinary Matters (also known as the Department of Advocate) is organized under the Bureau of Legal Affairs. The Office provides legal counsel on employment and personnel matters, represents the Department in all disciplinary cases heard at the Office of Administrative Trials and Hearings, handles medical separations, and serves as Department liaison to the City Law Department on employment-related litigation.

As of December 13, 2002, the Office consisted of 10 employees, including eight civilian and two uniformed employees. We determined that the positions filled by these two uniformed employees (one Sanitation Worker and one Supervisor) could be civilianized. The annual salary and fringe benefit cost for the uniformed employees in these positions totaled \$150,479 (shown in Table XIV). When we compared this amount to the average annual salary and fringe benefits of comparable civilian titles, we concluded that the Department could save \$80,151 annually by civilianizing these two positions.

Table XIV
Cost Savings from Civilianizing Two Positions in the
Office of Employment and Disciplinary Matters

(1) Number of Positions	(2) Uniformed Title	(3) Uniformed Employee Average Salary & Fringe Benefits	(4) Total Uniformed Salary & Fringe Benefits (Col. 1 x Col. 3)	(5) Comparable Civilian Titles	(6) Civilian Average Salary & Fringe Benefits	(7) Total Civilian Salary & Fringe Benefits (Col. 1 x Col. 6)	(8) Cost Savings (Col. 4 less Col. 7)
1	Supervisor	\$85,235	\$85,235	Sanitation Enforcement Agent	\$35,164	\$35,164	\$50,071
1	Sanitation Worker	\$65,244	\$65,244	Sanitation Enforcement Agent	\$35,164	\$35,164	\$30,080
2	Total		\$150,479			\$70,328	\$80,151

Office of Chief of Staff and Executive Division

Environmental Enforcement Unit

The Environmental Enforcement Unit (EEU) (also known as the Environmental Police Unit) is organized under the Department's Chief of Staff. Separate from the Enforcement Division (also known as the Sanitation Police), the EEU enforces the laws and regulations governing the storage, transportation, and proper disposal of regulated medical waste, asbestos, and hazardous waste. It conducts inspections of hospitals and nursing homes to ensure proper disposal of regulated medical waste. It also inspects medical practices that operate in multi-dwelling buildings to ensure compliance with the Professional Fee Program, in which regulated medical waste must be properly disposed of and not commingled with other solid waste.

The EEU also investigates sites that are potential sources of hazardous materials and low level radioactive waste found in Department collection trucks. Also, it has a State-certified asbestos laboratory and a photo laboratory that are used for analyses, particularly in preparing court testimony. This unit is empowered to enforce environmental laws and issue summons of up to \$30,000 to industrial contractors for illegal dumping of asbestos.

As of December 13, 2002, the EEU had a total of 10 employees, including nine uniformed (seven Sanitation Workers and two Supervisors) employees and one civilian employee. According to EEU officials, the uniformed employees assigned to the unit are fully trained peace officers and carry side arms. As previously discussed, we recognize the Department's need to staff positions in the EEU with appropriately trained and experienced employees to ensure that the Unit can effectively carryout its duties. Therefore, the Department should consider civilianizing approximately half (4) of the nine positions we identified with civilian employees in the title of Sanitation Enforcement Agent and require the same peace officer training and status for these four civilian Enforcement Agents as it currently requires of uniformed employees assigned to the EEU. Thereafter, the Department could measure the effectiveness of civilianizing these positions and determine the appropriateness for

civilianizing the remaining five positions in the EEU filled by uniformed employees. In so doing, the Department could realize potential savings.

The annual salary and fringe benefit costs for the four uniformed employees (shown in Table XV) in positions that the Department should consider for civilianization, totaled \$240,545. When we compared this amount to the average annual salary and fringe benefits of comparable civilian titles, we concluded that the Department could save \$99,890 annually by civilianizing these four positions.

Table XV
Cost Savings from Civilianizing Four Positions in the
Environmental Enforcement Unit

(1) Number of Positions	(2) Uniformed Title	(3) Uniformed Employee Average Salary & Fringe Benefits	(4) Total Uniformed Salary & Fringe Benefits (Col. 1 x Col. 3)	(5) Comparable Civilian Titles	(6) Civilian Average Salary & Fringe Benefits	(7) Total Civilian Salary & Fringe Benefits (Col. 1 x Col. 6)	(8) Cost Savings (Col. 4 less Col. 7)
4	Sanitation Worker	\$60,136.29	\$240,545	Sanitation Enforcement Agent	\$35,163.71	\$140,655	\$99,890

Permit Inspection Unit

The Permit Inspection Unit, organized under the Department's Chief of Staff, oversees the solid waste transfer stations and fill material operations in the City. Fill material operations consist of the grading, leveling, and compacting of fill materials for the purpose of land alteration and improvement. The Permit Inspection Unit issues permits for and conducts regular inspections of fill material operations to ensure that only appropriate materials (not solid waste) are used to grade and fill land within New York City. The Unit has the authority to issue summons for violations that carry a penalty of up to \$10,000.

As of December 13, 2002, the Permit Inspection Unit had a total of 24 employees, including 22 uniformed and two civilian employees. As previously discussed, we recognize the Department's need to staff positions in the Permit Inspection Unit with appropriately trained and experienced employees to ensure that the Unit can effectively carryout its duties. Therefore, the Department should consider civilianizing approximately half (10) of the 22 positions we identified with civilian employees in the title of Sanitation Enforcement Agent and require the same peace officer training and status for these civilian Enforcement Agents as it currently requires of uniformed employees assigned to the Unit. Thereafter, the Department could measure the effectiveness of civilianizing these positions and determine the appropriateness for civilianizing the remaining 12 positions in the Unit filled by uniformed employees. In so doing, the Department could realize potential savings.

The annual salary and fringe benefit costs for the 10 uniformed employees (shown in Table XVI) in positions that the Department should consider for civilianization totaled \$619,989.

When we compared this amount to the average annual salary and fringe benefits of comparable civilian titles, we concluded that the Department could save \$268,353 annually by civilianizing these 10 positions.

Table XVI
Cost Savings from Civilianizing 10 Positions in the
Permit Inspection Unit

(1) Number of Positions	(2) Uniformed Title	(3) Uniformed Employee Average Salary & Fringe Benefits	(4) Total Uniformed Salary & Fringe Benefits <i>(Col. 1 x Col. 3)</i>	(5) Comparable Civilian Titles	(6) Civilian Average Salary & Fringe Benefits	(7) Total Civilian Salary & Fringe Benefits <i>(Col. 1 x Col. 6)</i>	(8) Cost Savings <i>(Col. 4 less Col. 7)</i>
2	Supervisor	\$78,910.60	\$157,821	Sanitation Enforcement Agent	\$35,163.60	\$70,327	\$87,494
8	Sanitation Worker	\$57,771.06	\$462,168	Sanitation Enforcement Agent	\$35,163.64	\$281,309	\$180,859
10	Total		\$619,989			\$351,636	\$268,353

Bureau of Support Operations

Bureau of Building Maintenance

The Bureau of Building Maintenance (part of the larger Bureau of Support Operations) provides both routine maintenance and emergency building repairs for some 200 Department facilities, including garages, repair shops, office buildings, etc. The Bureau is also responsible for painting and lettering all Department vehicles.

As of December 13, 2002, the Bureau of Building Maintenance consisted of three uniformed Sanitation Workers and 174 civilian employees. The uniformed Bureau employees are responsible for moving trucks and vehicles that are serviced by the Bureau. Therefore, we determined that the positions filled by the three uniformed Sanitation Workers could be civilianized. The annual salary and fringe benefit costs for these three uniformed employees (shown in Table XVII) totaled \$177,855. When we compared this amount to the average annual salary and fringe benefits of comparable civilian titles, we concluded that the Department could save \$58,683 annually by civilianizing these three positions.

Table XVII
Cost Savings from Civilianizing Three Positions in the
Bureau of Building Maintenance

(1) Number of Positions	(2) Uniformed Title	(3) Uniformed Employee Average Salary & Fringe Benefits	(4) Total Uniformed Salary & Fringe Benefits (Col. 1 x Col. 3)	(5) Comparable Civilian Titles	(6) Civilian Average Salary & Fringe Benefits	(7) Total Civilian Salary & Fringe Benefits (Col. 1 x Col. 6)	(8) Cost Savings (Col. 4 less Col. 7)
3	Sanitation Worker	\$59,285.00	\$177,855	Motor Vehicle Operator	\$39,724.00	\$119,172	\$58,683

Based on our review of the 16 work units in the Department, we conclude that 367 of the 446 uniformed positions in these units should be civilianized, for a total savings of over \$7.45 million. We recognize that current budget circumstances most likely will not allow the Department of Sanitation to hire additional employees in the near future. However, as uniformed personnel resign, retire, or otherwise leave the department, lower cost civilian personnel could be hired or transferred to these units to begin to assume some of the civilian-type functions currently performed by uniformed officers.

Recommendations

The Department of Sanitation should:

1. Civilianize the 313 positions identified in this report that have duties not directly related to sanitation activities per se and that are filled by uniformed personnel.

Department Response: “We agree that DSNY should always look to reduce costs which may include civilianization. Our Executive Budget for fiscal year 2004 demonstrates our compliance. We will begin to civilianize some positions in our Supervised Sick Leave Unit and assess the impact of this civilianization. We will continue to monitor our job requirements in the coming years, and when the opportunity arises, we will replace uniformed personnel with civilians in titles whose duties, in our judgement, match as closely as possible those of the uniformed staff’s. These civilian positions may not necessarily be the ones recommended in the report.”

2. Conduct a comprehensive review of all other units to identify additional positions suitable for civilianization that could generate cost savings.

Department Response: The Department agreed, stating: “We have been doing this exercise over the years and will continue to do so.”



sanitation

JOHN J. DOHERTY
Commissioner

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April 28, 2003

Mr. Greg Brooks
Deputy Comptroller
Policy, Audits, Accountancy & Contracts
Office of the Comptroller, Executive Offices
One Centre Street, Room 1100
New York, NY 10007-2341

Re: **DRAFT:**
**Audit Report on Potential Savings From
Civilianizing Positions in the Department of Sanitation**

AUDIT NUMBER: MH03-078A

Dear Deputy Comptroller Brooks:

Thank you for the opportunity to review and comment on the above referenced draft report before its public release. At a time when every City agency is facing severe financial difficulties, we greatly appreciate your office's efforts to help us reduce our operating costs.

Here are our comments on certain assertions in the report and on the two recommendations:

The Department's Civilianization Reviews are Occasional and Non-Systematic
(last paragraph, on page 3 of report)

As we indicated to the auditors during the course of the audit, civilianization has always been in our yearly agenda. While we do not have a distinct unit whose sole function is to identify positions in the Department that could be civilianized, the Bureau of Planning & Budget during the normal budget cycle (Adopted, November, Preliminary and Executive) continually review all of the Department's operations and headcount to identify opportunity for savings, including civilianization. For example, not mentioned in the report is the fact that, in fiscal year 2003, we civilianized 32 positions in seven of our Marine Transfer Stations and 47 Sanitation Police positions in our Enforcement Unit. We also identified 10 positions in our Community Action Center for civilianization. These are the same 10 Sanitation Workers in the Bureau of Public Information and Community Affairs that the report recommended to be replaced by Community Associates. It is, therefore, not accurate to characterize our efforts to civilianize as anything other than continual and organized.

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Experience and Greater Flexibility Not Justification for Keeping Uniformed Personnel in Administrative Positions (paragraphs three and four on page 8 of report)

We cannot over-emphasize the importance of experience in departmental procedures and functional flexibility of our uniformed personnel assigned to administrative duties. We believe these attributes are what makes them more beneficial to the agency. While certain civilian positions may have some of the duties performed by uniformed staff, no one civilian title can cover all duties routinely assigned to uniformed personnel. You mention that we should get the proper mix of civilian titles to cover the wide range of duties performed by the uniform personnel. However, you fail to admit that in small units "the proper mix" might require an increase in the number of positions, which of course, increases the cost of the function. For example: in the Derelict Vehicle Operations Unit, the Sanitation workers not only tag abandoned vehicles for removal by private vendors but also transport abandoned boats, tankers and drums and drive vehicles slated for relinquishment from one borough to another. In addition, they are assigned to waste collection and specialized snow duties (on bridges and highways) on an as-needed basis. Compliance Agents recommended to replace them could not possibly be expected to perform all these functions. In FIAT, the seven General Superintendents there, in addition to their administrative and investigative duties, are qualified to fill-in for district superintendents, and some have done so over the years. In addition, their time in the Field as district managers provides a level of experience regarding uniform operations which is invaluable when conducting Audits. Civilian investigators could not possibly be as effective. An Accountant, as recommended, would be limited to the administrative and, perhaps, investigative duties. In Safety & Training, it is difficult for us to imagine Staff Analysts replacing the 14 Sanitation Workers and 15 Supervisors who, not only train new employees how in the use of heavy equipment, but also are assigned to snow duties. Moreover, union rules may restrict employees from working out-of-title. The savings mentioned in the report may not be realized if we have to hire two or three additional civilian employees with different titles to replace one uniformed worker who is experienced and highly flexible.

Recommendation No. 1: Civilianize 367 Positions Identified in the Report

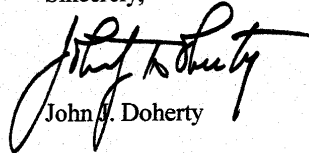
We agree that DSNY should always look to reduce costs which may include civilianization. Our Executive Budget for fiscal year 2004 demonstrates our compliance. We will begin to civilianize some positions in our Supervised Sick Leave Unit and assess the impact of this civilianization. We will continue to monitor our job requirements in the coming years, and when the opportunity arises, we will replace uniformed personnel with civilians in titles whose duties, in our judgment, match as closely as possible those of the uniformed staff's. These civilian positions may not necessarily be the ones recommended in the report.

Recommendation No. 2: Conduct a Comprehensive Review of all Other Units to Identify Positions Suitable for Civilianization

We have been doing this exercise over the years and will continue to do so.

We hope you will incorporate our comments in the final version of the report. If your office needs further information, please call our audit liaison, Mr. Cris Gonzales, at (212) 442-0512.

Sincerely,



John J. Doherty

c: S. Kupferman, Director, Mayor's Office of Operations