



**Equal Employment
Practices Commission**

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July 27, 2015

Pauline Toole
Commissioner
Department of Records and Information Services
31 Chambers Street, Room 305
New York, NY 10007

Re: Audit Preliminary Determination: Review, Evaluation and
Monitoring of the Department of Records and Information
Services' Employment Practices and Procedures from January 1,
2012 to December 31, 2014.

Dear Commissioner Toole:

On behalf of the members of the Equal Employment Practices Commission (Commission or EEPC), thank you and your agency for the cooperation extended to our staff during the course of this audit. This letter contains the Commission's findings and preliminary determinations pursuant to our audit and analysis of your agency's employment practices and procedures for the period covering January 1, 2012 to December 31, 2014.

The New York City Charter, Chapter 36, Section 831(d)(5), empowers this Commission to audit and evaluate city agencies' employment practices, programs, policies and procedures, and their efforts to ensure fair and effective equal employment opportunity for employees and applicants seeking employment with city agencies. Section 831(d)(2) provides that this Commission may, pursuant to an audit, make a preliminary determination that any plan, program or procedure utilized by any city agency does not provide equal employment opportunity and recommend all necessary and appropriate procedures, approaches, measures, standards and programs to be utilized by agencies in these efforts.

The Department of Records and Information Services, which may herein be referred to as "the agency," falls within the Commission's purview under Chapter 36, Section 831(a) of the New York City Charter, which delineates city agency as any "city, county, borough or other office, administration, board, department, division, commission, bureau, corporation,

authority, or other agency of government where the majority of the board members of such agency are appointed by the mayor or serve by virtue of being city officers or the expenses of which are paid in whole or in part from the city treasury...”

The purpose of this audit and analysis is to evaluate the agency's employment practices and procedures. This Commission has adopted Uniform Standards for EEOC Audits^[1] and Minimum Equal Employment Opportunity Standards for Community Boards to assess agencies' EEO programs and policies for compliance with federal, state and local laws, regulations, policies and procedures which are designed to increase equality of opportunity for municipal government employees and job applicants. These standards are founded upon and consistent with federal, state and local laws, regulations, procedures and policies including, but not limited to, the Citywide Equal Employment Opportunity Policy - Standards and Procedures to be Utilized by City Agencies; the New York City Human Rights Law (NYC Administrative Code, §§8-107(1)(a) and (d), 8-107.13, and 8-107.1; the New York State Civil Service Law §55-a; the Equal Employment Opportunity Commission's Instructions to Federal Agencies for EEO, Management Directive 715; the Uniform Guidelines on Employee Selection Procedures (29 CFR §§1607.3 - 1607.7), the Americans with Disabilities Act and its Accessibility Guidelines, and the equal employment opportunity requirements of the New York City Charter. Prescribed corrective actions are consistent with the aforementioned parameters. This Commission does not issue findings of discrimination pursuant to the New York City Human Rights Law.

Since this Commission is empowered to review and recommend actions which each agency should consider including in its annual plan of measures and programs to provide equal employment opportunity (Annual EEO Plan), the audited agency should incorporate required corrective actions in its current EEO Program and prospective Annual EEO Plans.

Scope and Methodology

This Commission's audit methodology includes collection and analysis of the documents, records and data the agency provides in response to the *EEOC Document and Information Request Form*; responses to the *EEOC Interview Questionnaires* for EEO professionals and others involved in EEO program administration; and, review of the agency's *Annual EEO Plans* and *Quarterly EEO Reports* and if applicable, analysis of workforce and utilization data from the *Citywide Equal Employment Database System* (CEEDS).

This Commission reviews data from CEEDS to understand the concentrations of race and gender groups within an agency's workforce. EEO Program Analysts examine imbalances between the number of employees in a particular job category and the number that would reasonably be expected when compared to their availability in the relevant labor market. Personnel transactions are reviewed in order to ascertain the agency's employment practices. Where underutilization is revealed within an agency's workforce, EEO Program Analysts assess whether the agency has undertaken reasonable measures to address it.

^[1] Corresponding audit/analysis standards are numbered throughout the document.



EEO professionals (including, but not limited to, past or current EEO Officers, Deputy or Co-EEO Officers, EEO Counselors, EEO Trainers, EEO Investigators, Disability Rights Coordinators, Career Counselors, 55-a Program Coordinators) and others involved in EEO program administration such as the Principal Human Resources Professional are given a two-week deadline to complete their individual questionnaires and return any items requested. The Commission's EEO Program Analysts also conduct additional research and follow-up discussions or interviews with EEO professionals, when appropriate.

Description of the Agency

The Department of Records and Information Services preserves and provides public access to historical and contemporary records and information about New York City government through the Municipal Archives, the Municipal Library, and the Visitor Center. The Municipal Records Management Division operates records storage facilities in two locations with a combined capacity of 700,000 cubic feet, and provides records management services to fifty City agencies, ten courts, and the five district attorneys' offices. Records services include scheduling, off-site storage and retrieval, and overall guidance on management of records in all media. The Grants Administration Unit assists mayoral agencies in obtaining and managing grants from the New York State Archives' Local Government Records Management Improvement Fund. (<http://www.nyc.gov/html/records>, July 2015.)

PRELIMINARY DETERMINATIONS AFTER AUDIT AND ANALYSIS

Following are the corresponding audit standards for each subject area along with the EEPC's findings and required corrective actions, where appropriate:

I. ISSUANCE, DISTRIBUTION AND POSTING OF EEO POLICIES:

Determination: The agency is in compliance with the standards for this subject area.

1. Issue a general EEO Policy statement or memo reiterating commitment to EEO, declaring the agency's position against discrimination on any protected basis, advising employees of the names and contact information of EEO professionals, and attaching, or providing employees pertinent electronic links to an EEO Policy/Handbook.
- ✓ The agency issued an EEO Policy statement via email on July 15, 2014 to all staff. The memorandum states that *"the Department of Records and Information Services is committed to preventing illegal discrimination by ensuring that all employees are aware of their rights and obligations under the EEO Policy."* The memorandum includes the name, address, and phone number of the agency's EEO Officer, and principal Human Resources Professional (who also served as the agency's Career Counselor, Disability Rights Coordinator and 55-a Coordinator). The memorandum also emphasized that managers and supervisors must conduct documented meetings with staff, at least once per year, to reaffirm their commitment to the agency's EEO Policy.

2. Distribute/Post a paper or electronic copy of the *Equal Employment Opportunity Policy, Standards and Procedures to Be Utilized by City Agencies* – or an agency EEO Policy that conforms to city, state and federal laws – for use by managers, supervisors, and legal, human resources and EEO professionals. Include, or attach as an addenda: a policy against sexual harassment; uniform and responsive procedures for investigating discrimination complaints and providing reasonable accommodations; an up-to-date list of protected classes under NYC and NYS Human Rights Laws; and current contact information for the agency's EEO professionals, as well as federal, state and local agencies that enforce laws against discrimination.
- ✓ The agency followed the City of New York's EEO Policy: *Standards and Procedures to be Utilized by City Agencies (2014, Citywide EEOP)*, which includes a policy against Sexual Harassment; uniform and responsive procedures for investigating discrimination complaints and providing reasonable accommodations that conform to city, state and federal laws; an up-to-date list of protected classes under NYC and NYS Human Rights Laws; and current contact information for federal, state and local agencies that enforce laws against discrimination. The policy was distributed on July 15, 2014 via email to all employees and is also included in the agency's new hire package.

II. EEO TRAINING FOR AGENCY:

Determination: The agency is in compliance with the standard for this subject area.

3. Establish and implement an EEO training plan for new and existing employees to ensure that all individuals who work within the agency, including managers and supervisors, receive training on unlawful discriminatory practices under local, state and federal EEO laws; EEO rights and/or responsibilities; discrimination complaint and investigation procedures; prevention of sexual harassment; and reasonable accommodation procedures.
- ✓ In 2013, the agency conducted several trainings sessions: *Structured Interviewing/ Diversity/ Career Development* (6 supervisors /managers were in attendance), *Diversity/ Career Development* (10 employees at various levels were in attendance) and *Sexual Harassment* (which 33 employees attended). In addition, 43 employees (or 83% of the agency staff) completed *EEO Computer Based Training* provided by the Department of Citywide Administrative Services' Office of Citywide Diversity and EEO in April 2013.

III. EMPLOYMENT PRACTICES (Recruitment, Hiring &Promotion):

Determination: The agency is in partial compliance with the standards for this subject area.

4. Assess recruitment efforts to determine whether such efforts adversely impact any particular group. To the extent that adverse impact is discovered, at a minimum, identify relevant professional and community organizations serving women, minorities, and other protected groups throughout the City, review and update listings of recruitment outreach sources, and contact these organizations when provisional positions become available or where the agency may otherwise use discretion in hiring.

- The agency did not provide documentation that it assessed its recruitment efforts to determine whether such efforts adversely impact any particular group. Corrective action is required.

Corrective Action 1: Assess recruitment efforts to determine whether such efforts adversely impact any particular group. To the extent that adverse impact is discovered, at a minimum, identify relevant professional and community organizations serving women, minorities, and other protected groups throughout the City, review and update listings of recruitment outreach sources, and contact these organizations when provisional positions become available or where the agency may otherwise use discretion in hiring.

5. The principal EEO Professional, HR Professional, and General Counsel, review the agency's statistical information (i.e. workforce, hires, promotions, and separations by race/ethnicity and gender), the annual number of EEO complaints, and the agency's employment practices, policies and programs on an annual basis to identify whether there are barriers to equal opportunity within the agency and determine what, if any, corrective actions are required to correct deficiencies.
- ✓ The principal Human Resources Professional reviewed CEEDs (Citywide Equal Employment Database System) reports which included workforce, hires, promotions, and separations by race/ethnicity and gender on an as needed basis.
 - During the period in review the agency did not have a General Counsel on staff. The agency did not ensure that the principal EEO Professional reviewed the agency's annual number of EEO complaints, and the agency's employment practices, policies and programs to identify whether there are barriers to equal opportunity within the agency and determine what, if any, corrective actions were required to correct deficiencies. Corrective action is required.

Corrective Action 2: Ensure that the principal EEO Professional and HR Professional review the agency's annual number of EEO complaints, and the agency's employment practices, policies and programs on an annual basis to identify whether there are barriers to equal opportunity within the agency and determine what, if any, corrective actions are required in order to correct deficiencies (e.g. underutilization or adverse impact). If necessary, consult with the Law Department, Division of Citywide Diversity and EEO, or another resource for guidance.

6. Assess the manner in which candidates are selected for employment, to determine whether there is any adverse impact upon any particular racial, ethnic, disability, or gender group. To the extent that adverse impact is discovered, determine whether the selection criteria being utilized are job-related. Discontinue using criteria that are not job-related, and adopt methods which diminish adverse impact.
 - The agency did not provide documentation that it assessed the manner in which candidates are selected for employment, to determine whether there was any adverse impact upon any particular racial, ethnic, disability, or gender group during the period in review. In addition, data from the 2nd Quarter, 2015 CEEDS Report- *Work Force Compared with Internal and*

External Pools indicates underutilization of protected classes in two job groups. **Corrective action is required.**

Corrective Action 3: Assess the manner in which candidates are selected for employment, to determine whether there is any adverse impact upon any particular racial, ethnic, disability, or gender group. To the extent that adverse impact is discovered, determine whether the selection criteria being utilized are job-related. Discontinue using criteria that are not job-related, and adopt methods which diminish adverse impact.

7. If women, minorities, or other protected groups are underrepresented in titles where there is discretion in hiring, advertise in minority- or female-oriented publications; contact organizations serving women, minorities, and other protected groups; participate in career fairs/open houses; or use internships to attract interested persons and to develop and hire interested and qualified candidates.

➤ The 2nd Quarter, 2015 *CEEDS* Report - *Work Force Compared with Internal and External Pools* (the last quarter of the audit period) indicates underutilization of protected classes in two job groups which may include discretionary titles (see appendix 1). **Corrective action is required.**

Corrective Action 4: If women, minorities, or other protected groups are underrepresented in titles where there is discretion in hiring, advertise in minority- or female-oriented publications; contact organizations serving women, minorities, and other protected groups; participate in career fairs/open houses; or use internships to attract interested persons and to develop and hire interested and qualified candidates.

8. If women, minorities, or other protected groups are underrepresented in ***civil service*** (list) titles, review the competencies, skills and abilities required (as presented in job vacancy notices and notices of examination) for available positions to ensure that these standards are updated, job-related and required by business necessity. (This includes working with DCAS or the Civil Service Commission if applicable). Then advertise in minority- or female-oriented publications, contact organizations serving women, minorities, and other protected groups; participate in career fairs or open houses; or use internships to attract interested persons and to develop and hire interested and qualified candidates.

➤ The aforementioned *CEEDS* Report (2nd Quarter, 2015), indicates underutilization of protected classes in two job groups which may also include civil service (list) titles, however; the agency did not provide documentation that it conducted a review of the competencies, skills and abilities required (as presented in job vacancy notices and notices of examination) for available positions in *civil service* (list) titles to ensure that these standards are updated, job-related and required by business necessity. **Corrective action is required.**

Corrective Action 5: If women, minorities, or other protected groups are underrepresented in *civil service* (list) titles, review the competencies, skills and abilities required (as presented in job vacancy notices and notices of examination) for available positions to ensure that these

with DCAS or the Civil Service Commission if applicable). Then advertise in minority- or female-oriented publications, contact organizations serving women, minorities, and other protected groups; participate in career fairs or open houses; or use internships to attract interested persons and to develop and hire interested and qualified candidates.

9. Ensure that human resources professionals, managers, supervisors, and other personnel involved in the recruitment and hiring process are trained in EEO and interviewing, selection, and hiring skills to enable such individuals to correctly identify the most capable candidates (i.e. structured interview training or guide).
- ✓ The agency's *Annual Diversity and EEO Plan* for fiscal year 2013 included a plan to conduct *Structured Interview/ Diversity/ Career Development* trainings for 6 Human Resources personnel, and 10 Managers/ Supervisors. The agency's 3rd quarter, 2013 *Report on EEO Activity* indicated the attendance of 6 Supervisors/Managers in *Structured Interviewing/ Diversity/ Career Development* training conducted by the agency in May 2013.
 - The agency did not submit documentation that human resources professionals, managers, supervisors, and other personnel involved in the recruitment and hiring process were trained in EEO and interviewing, selection, and hiring skills to enable such individuals to correctly identify the most capable candidates. **Corrective action is required.**

Corrective Action 6: Ensure that human resources professionals, managers, supervisors, and other personnel involved in the recruitment and hiring process are trained in EEO and interviewing, selection, and hiring skills to enable such individuals to correctly identify the most capable candidates (i.e. structured interview training or guide).

10. Promote employees' awareness of opportunities for promotion and transfer within the agency, and ensure that employees are considered for such opportunities.
 - ✓ The Career Counselor's responsibilities included posting and circulating civil service exam and job vacancy notices internally, and meeting with staff, interns and volunteers regarding job opportunities.
11. At minimum, indicate the agency is an equal opportunity employer in recruitment literature.
 - ✓ The agency advertised several vacant positions during the period in review including; *College Aide, Public Records Officer, Community Assistant, and Administrative Manager-Non-Managerial*. Each job vacancy notice included the EEO tagline: "*The City of New York is an Equal Opportunity Employer.*".
12. Use and maintain an applicant/candidate log or tracking system which, at minimum, includes the *position, applicants'/candidates' names, identification number, ethnicity, gender, disability or veteran status, interview date, interviewers' names, result, reason selected/not selected (or disposition)* of each applicant, and *recruitment source*. Ensure that the process avoids the

appearance of bias by delegating the responsibility for recording and maintaining this information to an individual other than the hiring manager.

- The agency did not provide documentation or information which indicated that it maintained an applicant/candidate log or tracking system which, at minimum, included the *position, applicants'/candidates' names, identification number, ethnicity, gender, disability or veteran status, interview date, interviewers' names, result, reason selected/not selected (or disposition)* of each applicant, and *recruitment source*. Corrective action is required.

Corrective Action 7: Use and maintain an applicant/candidate log or tracking system which, at minimum, includes the *position, applicants'/candidates' names, identification number, ethnicity, gender, disability or veteran status, interview date, interviewers' names, result, reason selected/not selected (or disposition)* of each applicant, and *recruitment source*. Ensure that the process avoids the appearance of bias by delegating the responsibility for recording and maintaining this information to an individual other than the hiring manager.

IV. CAREER COUNSELING:

Determination: The agency is in partial compliance with the standards for this subject area.

13. Designate a professional (may be referred to as the Career Counselor) with appropriate training, knowledge and familiarity with career opportunities in City government to provide career counseling to employees upon request. Remind employees of the identity/type of guidance available from the Career Counselor at least once each year.
- ✓ In November 2006, the agency appointed the Director of Administrative Operations, as its principal Human Resources Professional. The principal Human Resources Professional also served as the agency's Career Counselor, Disability Rights Coordinator and 55-a Coordinator. The Director of Administrative Operations completed *Basic Training for EEO Representatives* in April 2006 and *Computer Based Training* in June 2009; both provided by the Department of Citywide Administrative Services' Office of Citywide Diversity and EEO. The name, email address and phone number for the Director of Administrative Operations along with the agency's other EEO professionals was distributed by the agency head via email memorandum to all staff on April 11, 2014, June 30, 2014, September 22, 2014 and November 21, 2014.
14. The Human Resources Professional distributes the identity of the agency Career Counselor and ensures that all employees have access to information regarding job responsibilities, performance evaluation standards, examinations, training opportunities and job postings; informs the principal EEO Professional of the number of 55-a program participants and efforts the agency has made to employ, promote or accommodate qualified individuals with disabilities; involves the principal EEO Professional in EEO-related matters.
- ✓ The principal Human Resources Professional's (Director of Operations) responsibilities included posting and circulating civil service exam and job vacancy notices internally, and meeting with

staff, interns and volunteers regarding job opportunities. The agency provided cross-training and cross divisional assignments to ensure operational continuity in the event of absenteeism.

- The agency did not provide documentation that all employees had access to information regarding job responsibilities, performance evaluation standards, and training opportunities. Additionally, the agency did not provide documentation that the principal Human Resources Professional kept the principal EEO Professional abreast of 55-a program participants or the efforts the agency has made to employ, promote or accommodate qualified individuals with disabilities. Corrective action is required.

Corrective Action 8: Ensure that all employees have access to information regarding job responsibilities, performance evaluation standards, and training opportunities. Maintain documentation of communications between the Human Resources Professional and EEO Professional regarding; 55-a program participants and efforts the agency has made to employ, promote or accommodate qualified individuals with disabilities.

**V. EEO AND REASONABLE ACCOMMODATIONS FOR EMPLOYEES/
APPLICANTS FOR EMPLOYMENT WITH DISABILITIES:**

Determination: The agency is in partial compliance with the standards for this subject area.

15. Ensure that information regarding employee rights and obligations, and the complaint, investigation and reasonable accommodation procedures is made available in appropriate alternative formats (i.e., large print, audio tape and/or Braille) upon request to employees and applicants for employment with disabilities.
 - ✓ The agency provided information regarding employee rights and obligations, and the complaint, investigation and reasonable accommodation procedures in the alternate format large print upon request. This information was also available in several languages: Haitian Creole, Italian, Korean, Russian, Chinese and Spanish.
16. Document reasonable accommodation requests and their outcomes.
 - ✓ The principal Human Resources Professional oversees the reasonable accommodation process, which includes sending, receiving and reviewing request forms. When approvals are given the principal Human Resources Professional is also charged with implementation. A copy of each request and their outcomes were maintained in a file.

NOTE: Accommodation requests and any accompanying medical records should be maintained in separate confidential files, apart from other personnel files.

VI. RESPONSIBILITY FOR EEO PLAN IMPLEMENTATION - EEO PROFESSIONALS:

Determination: The agency is in partial compliance with the standards for this subject area.

17. Appoint a principal EEO Professional to implement EEO policies and standards within the agency. The principal EEO Professional is trained and knowledgeable regarding city, state and federal EEO laws; the requirements of the agency's EEO policies, standards and procedures; and the prevention, investigation, and resolution of discrimination complaints.
- ✓ The agency appointed a Procurement Analyst as the principal EEO Professional in August 2014. The principal EEO Professional attended the Division of Citywide Diversity and Equal Employment Opportunity's *Basic Training for EEO Representatives* in June, 2014. Subsequent to the audit period, in July 2015, the agency appointed the *Special Assistant to the Commissioner* as principal EEO Professional to implement EEO policies and standards within the agency.
- The currently appointed EEO Professional has not received formal EEO training to ensure relevant knowledge of city, state and federal EEO laws; the requirements of the agency's EEO policies, standards and procedures; and the prevention, investigation, and resolution of discrimination complaints. Corrective action is required.

Corrective Action 9: Appoint a principal EEO Professional – who is trained and knowledgeable regarding city, federal and state EEO laws; the requirements of the agency's EEO policies, standards and procedures; and the prevention, investigation, and resolution of discrimination complaints – to implement EEO policies and standards within the agency.

18. Ensure that EEO professionals are trained in EEO laws and procedures and know how to carry out their responsibilities under the EEO Policy.
- ✓ In addition to the principal EEO Professional, the agency also appointed an EEO Professional of each gender (a male and a female EEO Counselor) to receive discrimination complaints and conduct investigations. One EEO Counselor completed Division of Citywide Diversity and Equal Employment Opportunity *EEO Computer Based Training* in June 2009. The Commissioner informed all employees of the names, location and phone numbers of the EEO Counselors via agency wide memoranda on April 11, 2014, June 30, 2014 and September 22, 2014.
- The agency did not provide documentation that both EEO Counselors were trained in EEO laws and procedures. Corrective action is required.

Corrective Action 10: Ensure that EEO professionals are trained in EEO laws and procedures and know how to carry out their responsibilities under the EEO Policy.

Promptly attend training for EEO professionals by DCAS or another appropriate agency/school and obtain a certificate of completion.

19. The principal EEO Professional reports directly to the agency head (or an approved direct report other than the General Counsel) in order to exercise the necessary authority and independent judgment to fulfill EEO responsibilities.
- ✓ The principal EEO Professional reported directly to the agency head, this reporting relationship was reflected in the agency's organization chart.
20. To ensure the integrity and continuity of the EEO Program, maintain appropriate documentation of meetings and other communications between the agency head (or a direct report other than the General Counsel) and the principal EEO Professional regarding decisions that impact the administration and operation of the EEO program.
- The agency did not provide documentation that it maintained appropriate documentation of meetings and other communications between the agency head (or a direct report other than the General Counsel) and the principal EEO Professional regarding decisions that impact the administration and operation of the EEO program. **Corrective action is required.**

Corrective Action 11: Maintain appropriate documentation of meetings and other communications between the agency head (or a direct report other than the General Counsel) and the principal EEO Professional regarding decisions that impact the administration and operation of the EEO program.

VII. RESPONSIBILITY FOR EEO PLAN IMPLEMENTATION – SUPERVISORS/MANAGERS:
Determination: The agency is **not in compliance** with the standards for this subject area.

21. Establish and administer an annual managerial/non-managerial performance evaluation program to be used for probationary periods, promotions, assignments, incentives and training.
- ✓ The agency established an annual managerial/non-managerial performance evaluation program.
- The agency did not provide documentation that it administered annual managerial/non-managerial performance evaluations during the period in review. **Corrective action is required.**

Corrective Action 12: Implement an annual managerial/non-managerial performance evaluation program (with timetable) to be used for probationary periods, promotions, assignments, incentives and training.

22. The managerial performance evaluation form contains a rating for EEO (which covers responsibilities and processes for assuring their ability to make employment decisions based on merit and equal consideration, or treat others in an equitable and impartial manner).

- The agency's *Managerial Employee Performance Evaluation* did not contain a rating for EEO (which covers responsibilities and processes for assuring their ability to make employment decisions based on merit and equal consideration, or treat others in an equitable and impartial manner). Corrective action is required.

Corrective Action 13: Ensure that the managerial performance evaluation form contains a rating for EEO (which covers responsibilities and processes for assuring their ability to make employment decisions based on merit and equal consideration, or treat others in an equitable and impartial manner).

VIII. REPORTING STANDARD FOR AGENCY HEAD:

Determination: The agency is not in compliance with the standards for this subject area.

23. Submit to the EEPC an Annual Plan of measures and programs to provide equal employment opportunity, and quarterly reports (up to 30 days following each quarter) on efforts to implement the plan.

- The agency did not submit its Annual Plans of measures and programs to provide equal employment opportunity for 2012- 2015, or quarterly reports on efforts to implement these plans. Corrective action is required.

NOTE: On July 16, 2015 the agency submitted Annual Plans of measures and programs to provide equal employment opportunity for fiscal years 2012 and 2013, as well as quarterly reports on efforts to implement its 2012 plan.

Corrective Action 14: Submit to the EEPC an Annual Plan of measures and programs to provide equal employment opportunity, and quarterly reports (up to 30 days following each quarter) on efforts to implement the plan.

After implementation of the EEPC's corrective actions, if any:

24. The agency head distributes a memorandum informing employees of the changes implemented in the EEO program pursuant to the EEPC's audit/analysis and re-emphasizing the agency head's commitment to the EEO program.

Final Action: Distribute a memorandum signed by the agency head informing employees of the changes implemented in the EEO program pursuant to the EEPC's audit/analysis and re-emphasizing the agency head's commitment to the EEO program.

Conclusion

The agency has 14 required corrective action(s) at this time.



Pursuant to Chapter 36 of the New York City Charter, your agency has the *option* to respond to this *preliminary determination*, but must respond to our Final Determination if corrective action is required.

Optional Response to preliminary determination: If submitted, your optional response should indicate, with attached documentation, what steps your agency has taken or will take to implement the prescribed corrective actions, and must be received in our office within 14 days from the date of this letter. No extensions will be granted for the *option* to respond to the *preliminary determination*.

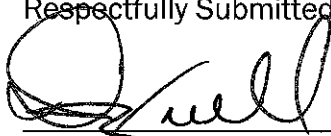
(Optional Conference) During the Optional Conference, we will discuss the immediate steps your agency should take and address questions regarding your agency's implementation of the prescribed corrective action(s).

(No Response Option) If your agency does not respond to this preliminary determination within 14 days, it will become the EEPC's Final Determination.

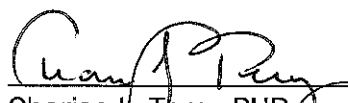
Mandatory Response to Final Determination: Following this preliminary determination, the EEPC will issue a Final Determination where we may modify or eliminate the corrective actions based on verified information; identify remaining action which requires further monitoring in order to ensure implementation; and assign a mandatory compliance-monitoring period of up to 6 months for this purpose. Pursuant to Chapter 36 of the New York City Charter your agency must respond to our Final Determination within 30 days. Your response to the Final Determination will initiate the compliance monitoring period.

In closing, we want to thank you and your staff for the cooperation extended to the Equal Employment Practices Commission's EEO Program Analysts during the course of our audit and analysis.

Respectfully Submitted by,


Ilacia N. Zuell, EEO Program Analyst

Approved by,


Charise L. Terry, PHR
Executive Director

c: Naomi Pacheco, principal Human Resources Professional
Joseph Mathis, principal EEO Professional

Appendix - 1

Department of Records and Information Services

Workforce Compared with Internal & External Pools

2nd quarter of fiscal year 2015

(end of audit period)

RUN DATE: 01/05/15
 RUN TIME: 8:19:56
 FY2015 Q2

NEW YORK CITY DEPARTMENT OF PERSONNEL
 C E E D S S Y S T E M
 WORK FORCE COMPARED WITH INTERNAL & EXTERNAL POOLS
 AT THE AGENCY/JOBGROUP LEVEL

PAGE: 109
 PROGRAM: EBP961
 EXTRACT DATE: 12/31/14

AGENCY: 860 DEPT. OF RECORDS AND INFORMATION SERVICE
 BEO VARIABLE: ETH ETHNICITY

PERSONS WITH MISSING BEO DATA INCLUDED IN CNTS
 PROBABILITY CUT-OFF FOR IMBALANCE: .050

JOB GROUP	INCMB TOTAL	WHITE OBSRV	EXPCT I	BLACK OBSRV	EXPCT I	HISPANIC OBSRV	EXPCT I	ASIAN / OBSRV	EXPCT I	NATIVE A OBSRV	EXPCT I	ETH UNKN OBSRV	EXPCT I
001 ADMINISTRATORS	1	1	1 N	0	0 N	0	0 N	0	0 N	0	0 N	0	0 N
002 MANAGERS	2	1	1 N	1	0 N	0	0 N	0	0 N	0	0 N	0	0 N
003 MNGMNT SPECS	16	10	7	2	5 U	1	2 U	1	2 U	1	0 O	1	0
004 SCIENCE PROFNS	2	0	1 N	2	0 N	0	0 N	0	0 N	0	0 N	0	0 N
012 CLERICAL SUPS	5	3	1 N	1	3 N	0	1 N	1	0 N	0	0 N	0	0 N
013 CLERICAL	16	3	3	4	9 U	6	2 O	3	1	0	0 N	0	1 N
027 TRANSPORTATION	1	0	0 N	1	0 N	0	0 N	0	0 N	0	0 N	0	0 N
031 PARA PROFESSION	7	2	2 N	3	2 N	0	2 N	1	1 N	0	0 N	1	0 N

RUN DATE: 01/05/15
 RUN TIME: 8:19:56
 FY2015 Q2

NEW YORK CITY DEPARTMENT OF PERSONNEL
 C E E D S S Y S T E M
 WORK FORCE COMPARED WITH INTERNAL & EXTERNAL POOLS
 AT THE AGENCY/JOBGROUP LEVEL

PAGE: 110
 PROGRAM: EBP961
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AGENCY: 860 DEPT. OF RECORDS AND INFORMATION SERVICE
 EEO VARIABLE: GEN GENDER

PERSONS WITH MISSING EEO DATA INCLUDED IN CNTS
 PROBABILITY CUT-OFF FOR IMBALANCE: .050

JOB GROUP	INCMB TOTAL	MALE OBSRV EXPCT I	FEMALE OBSRV EXPCT I	GENDER U OBSRV EXPCT I
001 ADMINISTRATORS	1	0	1 N	0
002 MANAGERS	2	2	1 N	0
003 MNGMNT SPECS	16	3	9 U	0
004 SCIENCE PROFNS	2	0	1 N	0
012 CLERICAL SUPS	5	2	1 N	0
013 CLERICAL	16	9	5 O	0
027 TRANSPORTATION	1	1	1 N	0
031 PARA PROFESSION	7	6	3 N	0