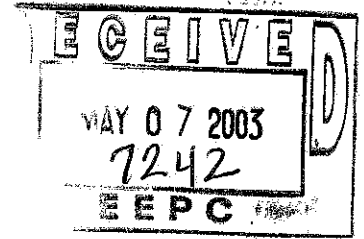


NYC Administration for Children's Services

William C. Bell
Commissioner



April 30, 2003

Mr. Frank R. Nicolazzi
Vice Chairman
Equal Employment Practices Commission
253 Broadway, Suite 301
New York, NY 10007

Dear Vice-Chair Nicolazzi:

I am writing in response to your letter dated December 11, 2003, which describes the Equal Employment Practices Commission's (EEPC) final audit determinations and the Administration for Children's Services (ACS) non-implementation of four corrective actions. Below please find the steps ACS has taken in implementing these corrective actions.

First, in recommendation number three, the EEPC states that in order "to ensure that individuals of both sexes are available to receive and investigate discrimination complaints, ACS should aggressively seek approval to hire a male EEO Investigator/Trainer." In addition, recommendation number ten states that in order for ACS to meet its obligations under the EEOP, "ACS should hire another EEO Investigator in addition to the male Investigator awaiting hiring approval." In 2000, ACS began the process to hire a male investigator and in December 2000 was granted budget approval. This position was filled and the employee worked as an EEO Investigator at ACS between April 2001 and September 2001. Since his departure, ACS has made extensive efforts to hire another male investigator. On October 15, 2002, another candidate was interviewed and accepted; however, ACS was unable to employ him due to New York City's residency requirement. ACS is currently aggressively recruiting a male investigator and an additional EEO investigator. We will fill both of these positions as soon as successful candidates are identified.

Second, the EEPC's sixth recommendation is that ACS "should ensure that all employees involved in interviewing receive structured interview training, either through internal training or training provided by DCAS." All staff currently certified as interviewers have been trained in the structured interviewing process. All future



interviewers will received structured interviewing training by their division manager prior to being certified as an interviewer for employee candidate interviews.

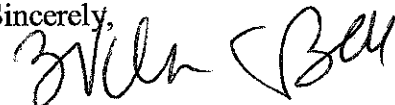
Finally, "A Guide for Structured Interviewing" will be inserted on the ACS Intranet. The guide will enable staff to continuously review the procedure. In addition, the ACS Intranet will direct staff to call OEEEO for technical assistance. A certificate of completion will be distributed after employees receive the briefing. This certificate will be used to track employees who have received the briefing. In addition, a refresher update will be required a year after the initial training. The refresher update will consist of a questionnaire, which will generate a second certificate. After one year, if an interviewer does not hold two certificates, the interviewer will be required to cease interviewing. In addition, all new appointed interviewers will be required to follow this process.

Recommendation number nine states that "the EEO officer should be involved in developing recruitment strategies and selecting recruitment media, including newspapers and other publications." EEO is heavily involved in the recruitment of qualified candidates. EEO monitors the recruitment of candidates by reviewing internal vacancy notices. In addition, EEO works closely with the personnel office regarding the citywide job vacancy program and recruitment at private and public university job fairs. Finally, EEO reviews and edits ACS's vacancy advertisements, attends meetings with community board leaders regarding recruitment, and is involved with the recruitment efforts in the media.

In further response to recommendation nine, "...agency heads must develop agency specific EEO policies and plans identifying any unfair barriers in the agency's recruitment, selection, compensation, training and/or promotion procedures. Corrective strategies must be developed to eliminate such barriers where identified." In June 2002 ACS OEEEO prepared and submitted to the EEPC the ACS Agency- Specific Plan for Fiscal year 2003. Please refer to the section entitled "Assessment of Employment Practices" (pps. 3-5) which addresses your concerns for recommendation number nine. In addition, EEO and personnel have had meetings on the following dates: April 9, 2002, April 25, 2002, June 25, 2002 and August 25, 2002.

In conclusion, ACS strives to adhere to Chapter 36 of the New York City Charter. If you have any further questions or comments please do not hesitate to contact me.

Sincerely,



William C. Bell