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VIA MAIL AND EMAIL

May 30, 2017

Kevin Holloran  
Executive Director  
NYC Police Pension Fund  
233 Broadway, 19<sup>th</sup> Floor  
New York, NY 10279

Re: Preliminary Determination for Audit: Review, Evaluation and Monitoring of the NYC Police Pension Fund's Employment Practices and Procedures from July 1, 2014 to December 31, 2016.

Dear Executive Director Holloran:

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 July 1, 2014 to December 31, 2016.

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 832.c 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 NYC Police Pension Fund, 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, not to issue findings of discrimination pursuant to the New York City Human Rights Law. This Commission has adopted *Uniform Standards for EEPAC Audits*<sup>1</sup> 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 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 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.

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 *EEPC Document and Information Request Form*; responses to the *EEPC Interview Questionnaires* for EEO professionals and others involved in EEO program administration; and, if applicable, review of the agency's *Annual EEO Plans* and *Quarterly EEO Reports* and analysis of workforce and utilization data from the *Citywide Equal Employment Database System* (CEEDS).

This Commission reviews the workforce statistics and utilization analysis information available via CEEDS to understand the concentrations of race and gender groups within an agency's workforce. (CEEDS may be unavailable for certain non-mayoral agencies. In such cases, the EEPAC requests that the agency submit similar statistics and analysis.) 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.

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 and

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<sup>1</sup> Corresponding audit/analysis standards are numbered throughout the document.



return their individual questionnaires. 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 Police Pension Fund is organized primarily to provide pension services for uniformed members of the New York City Police Department, all of whom are required to become members of the Plan. The Plan functions in accordance with existing New York State statutes and City laws. The Police Pension Fund was established by state law in 2001 for the administration and transaction of the business of the Fund and for the control and disposition thereof. The Executive Director serves as the head of the agency and reports directly to the Board of Trustees. The Board is comprised of twelve members: the Police Commissioner, who serves as Chairperson, the Comptroller, Commissioner of Finance, and representatives of each of the police unions.

The Police Pension Fund had 129 employees at the end of the period in review. (See workforce composition, attached as Appendix 2.)

## **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 partial 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.
- ✓ On April 19, 2015, the agency head issued a general EEO Policy statement, which stated: "*As Executive Director, I want to make clear to every manager, supervisor, and employee of our agency that the NYCPPF remains firmly committed to maintaining fair employment practices for all members of this organization as well as prospective job applicants. It is incumbent upon every member of this agency to make the same commitment to celebrate diversity and comply with the letter as well as the spirit of this policy. Managers and supervisors are directed to make all employment decisions in accordance with the agency's EEO policy and the ensure compliance in their areas of responsibility. The Policy provides that all employment decisions be made on the basis of equal opportunity and not on the basis of: age, actual or perceived race, color, national origin, alienage or citizenship status, religion or creed, gender (including "gender identity" -- which refers to a person's actual or perceived sex, and includes self-image, appearance, behavior or expression, whether or not different from that traditionally*

associated with the legal sex assigned to the person at birth), disability, age (18 and over), military status, prior record of arrest or conviction, marital status, partnership status, genetic predisposition or carrier status, sexual orientation, or status as a victim of domestic violence, a sex offense or stalking”, the policy statement also advised employees of the names and contact information of EEO professionals, and, embedded in the memo, were pertinent electronic links to the *Equal Employment Opportunity Policy, Standards and Procedures to Be Utilized by City Agencies (2014)*, the 2016 addendum to the EEO policy, and the EEO Handbook *About EEO: What You May Know*. The policy statement was posted in the office common areas, as well as to the agency’s electronic shared drive.

- The EEO policy statement did not include the most up to date protected classes, including discrimination against an applicant or employee based on credit history; however, it was supplemented by an EEO policy which included all EEO categories.

**NOTE:** The agency should ensure that the EEO policy and the EEO policy statement are up to date and consistent.

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 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 reported that the *Equal Employment Opportunity Policy, Standards and Procedures to Be Utilized by City Agencies (2014)*, the agency head’s memo (§I.1), the *Reasonable Accommodation Procedural Guidelines (2015)*, and the EEO Handbook *About EEO: What You May Know*, were posted in the common areas, as well as on the agency’s electronic shared drive, accessible to all employees. Also available on the agency’s electronic shared drive was the *EEO Complaint Procedural Guidelines (2016)*, and an up-to-date list of protected classes under NYC and NYS Human Rights Laws, current contact information for the agency’s EEO professionals (§I.1), and contact information for federal, state and local agencies that enforce laws against discrimination.

## **II. EEO TRAINING FOR AGENCY:**

**Determination:** The agency is not in compliance with the standards 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.

- The agency did not demonstrate that it established and implemented an EEO training program for new and existing employees. **Corrective action required.**

**Corrective Action #1:** 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.

**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 assess its recruitment efforts to determine whether such efforts adversely impact any particular group. Additionally, the CEEDS Report *Workforce Compared with Internal and External Pools* for the 1<sup>st</sup> quarter and the 2<sup>nd</sup> quarter of fiscal year 2016, indicated underutilization of minorities (Asian/Pacific Islander) in one job group (*Paraprofessionals*). (See Appendix 3-4)

**NOTE:** The underutilization was eliminated during the 3<sup>rd</sup> quarter of fiscal year 2016; the CEEDS Report: *Workforce Compared with Internal and External Pools* for the 3<sup>rd</sup> quarter of fiscal year 2017 (most recent quarter available) did not indicate underutilization of minorities in any job group. Therefore no further analysis was conducted.

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 agency reported that the principal HR professional reviewed the CEEDS Reports, and shared the data with the principal EEO professional; the agency also reported no EEO complaints during the period in review, no barriers to equal employment opportunities were identified, and no corrective actions were required.
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 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. Additionally, the CEEDS Report *Workforce Compared with Internal and External Pools* for the 1<sup>st</sup> quarter of fiscal year 2016, through the 2<sup>nd</sup> quarter of fiscal year 2016, indicated underutilization of minorities (Asian/Pacific Islander) in one (1) job group (*Paraprofessionals*). (See Appendix 3-4)

NOTE: The underutilization was eliminated during the 3<sup>rd</sup> quarter of fiscal year 2016; the CEEDS Report: *Workforce Compared with Internal and External Pools* for the 3<sup>rd</sup> quarter of fiscal year 2017 (last most recent quarter available) did not indicate underutilization of minorities in any job group. Therefore no further analysis was conducted.

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 CEEDS Report *Workforce Compared with Internal and External Pools* for the 1<sup>st</sup> quarter and the 2<sup>nd</sup> quarter of fiscal year 2016, indicated underutilization of minorities (Asian/Pacific Islander) in one job group (*Paraprofessionals*). (See Appendix 3-4)

NOTE: The underutilization was eliminated during the 3<sup>rd</sup> quarter of fiscal year 2016; the CEEDS Report: *Workforce Compared with Internal and External Pools* for the 3<sup>rd</sup> quarter of fiscal year 2017 (most recent quarter available) did not indicate underutilization of minorities in any job group.

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 CEEDS Report *Workforce Compared with Internal and External Pools* for the 1<sup>st</sup> quarter and the 2<sup>nd</sup> quarter of fiscal year 2016, indicated underutilization of minorities (Asian/Pacific Islander) in one job group (*Paraprofessionals*). (See Appendix 3-4)



**Equal Employment  
Practices Commission**

NOTE: The underutilization was eliminated during the 3<sup>rd</sup> quarter of fiscal year 2016; the CEEDS Report: *Workforce Compared with Internal and External Pools* for the 3<sup>rd</sup> quarter of fiscal year 2017 (most recent quarter available) did not indicate underutilization of minorities in any job group.

9. Ensure that human resources professionals, managers, supervisors, and other personnel involved in recruiting and hiring are trained to consider EEO laws/policies and use uniform, job-related techniques to identify, interview and select the most capable candidates (e.g. structured interview training or guide).
  - ✓ During the period in review, the agency's principal HR professional, and the unit supervisors/managers conducted all interviews using the DCAS *Guide to Structured Interviewing*; the guide included the following sections: *Structured Interview Questions, Checklist for Interviewer, Pre-Employment Inquiries, Effective Listening Techniques, Barriers to Effective Listening, Language, Closing the Interview, Evaluating the Interview, Potential Pitfalls, and Skills Checklist*. Structured interview questions were used for each position hired during the period in review.
10. Promote employees' awareness of opportunities for advancement and transfer within the agency by: administering incentive programs; publicizing promotions, including promotions into, or changes in, the managerial ranks; and/or using other methods to communicate internal opportunities.
  - The agency did not demonstrate that it promoted employees awareness of opportunities for advancement through incentive programs; publicized promotions, including promotions into, or changes in, the managerial ranks; or other methods to communicate internal opportunities. **Corrective action required.**

**Corrective Action #2:** Promote employees' awareness of opportunities for advancement and transfer within the agency by: administering incentive programs; publicizing promotions, including promotions into, or changes in, the managerial ranks; and/or using other methods to communicate internal opportunities.

11. Ensure that employees are considered internally for career enhancement, development opportunities and transfer by: providing and encouraging training, development or mentorship programs to improve their performance and skills; establishing internal talent pools via cross-training, cross divisional assignments, job transfers, and/or job rotation; and identifying internal successors with applicable knowledge/skills/abilities.
  - The agency did not demonstrate that it considered incumbent employees for career enhancement, development opportunities, and transfer.

**Corrective Action #3:** Ensure that employees are considered internally for career enhancement, development opportunities and transfer by: providing and encouraging training, development or mentorship programs to improve their performance and skills; establishing

internal talent pools via cross-training, cross divisional assignments, job transfers, and/or job rotation; and identifying internal successors with applicable knowledge/skills/abilities.

12. At minimum, indicate the agency is an equal opportunity employer in recruitment literature.

- ✓ During the period in review, the agency advertised several vacant positions including: *Retirement Counseling Help Desk (Clerical Associate), Pension Computation Asst. Retirement Benefits Analyst (Assistant Retirement Benefits), Safeguards Associate (Assistant Retirement Benefits), Accountant, and Management, Analysis and Planning Analyst (Management Auditor Trainee)*. Each job vacancy contained the EEO tagline: *"the NYC Police Pension Fund is an equal employment opportunity employer."*

13. 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 demonstrate that, during the period in review, it used an applicant/candidate log or tracking system.

**Corrective Action #4:** 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.

14. 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.

- The agency did not designate a professional with appropriate training, knowledge and familiarity with career opportunities in City government to provide career counseling to employees upon request.

**Corrective Action #5:** 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.



15. 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; ensures that all new employees are advised of the EEO policies, their rights and responsibilities under such policies and the discrimination complaint procedures; 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; and promptly consults with the principal EEO Professional if informed of, or suspects that a violation of the EEO Policy has occurred.
- ✓ The agency reported that, as part of orientation, the principal HR Professional advised newly hired employees of the EEO policies, their rights and responsibilities under such policies and the discrimination complaint procedures; principal HR Professional also provided the *Equal Employment Opportunity Policy, Standards and Procedures to Be Utilized by City Agencies (2014)*, the EEO policy statement, *Reasonable Accommodation Procedural Guidelines (2015)*, and the EEO Handbook *About EEO: What You May Not Know*. The agency reported that the principal EEO Professional was directly involved in all EEO-related matters, and that there were no EEO complaints during the period in review; the agency also reported no 55-a program participants during the period in review.
- The agency did not demonstrate that employees had access to information regarding job responsibilities, performance evaluation standards, examinations, training opportunities or job postings.

**Corrective Action #6:** Ensure that employees have access to information regarding job responsibilities, performance evaluation standards, examinations, and training opportunities

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

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

16. 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 reported that large print and audio versions of the *Equal Employment Opportunity Policy, Standards and Procedures to Be Utilized by City Agencies (2014)*, the addendum to the EEO policy (2016), *Reasonable Accommodation Procedural Guidelines (2015)*, and the EEO Handbook *About EEO: What You May Not Know*, were available during the period in review; additionally, the agency reported that it was committed to providing the aforementioned documentation in Braille, upon request. The agency reported that there were no requests for reasonable accommodation during the period in review.

17. Document reasonable accommodation requests and their outcomes.

- ✓ The agency's *Reasonable Accommodation Procedural Guidelines* stated, "All information, including a statement of the person requesting a reasonable accommodation or any other documentation, record, and the fact that the individual has requested or obtained a reasonable accommodation, shall be retained in the strictest confidence by City agencies". The agency reported that it was the responsibility of the HR Professional to maintain the information.

**VI. RESPONSIBILITY FOR EEO PLAN IMPLEMENTATION - EEO PROFESSIONALS:**

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

18. 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.

- ✓ On April 19, 2015, the agency appointed the *Secretary* as the principal EEO Professional. Employees were informed of the name and contact information via electronic mail, EEO posters displayed in common areas, and the agency head's EEO policy statement (see §I.1.)
  - The agency did not demonstrate that the principal EEO professional was 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. **Corrective action required.**

**Corrective Action #7:** Appoint a principal EEO Professional – who is trained and knowledgeable regarding city, state and 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.

19. 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 had an EEO Counselor, to assist the principal EEO Professional with response and follow up on EEO related complaints. Subsequent to the period in review, on January 24<sup>th</sup>, 2017 the EEO Counselor completed the *DCAS Computer-Based Training*.
  - The agency did not demonstrate that the EEO Counselor was trained in EEO laws and procedures and knew how to carry out their responsibilities under the EEO Policy. **Corrective action required.**

**Corrective Action #8:** Ensure that EEO professionals are trained in EEO laws and procedures and know how to carry out their responsibilities under the EEO Policy.

20. 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.

✓ During the period in review, principal EEO Professional reported directly to the Executive Director in order to exercise the necessary authority and independent judgment to fulfill EEO responsibilities. This reporting relationship was reflected in the agency's organizational chart.

21. 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.

➤ During the period in review, no meetings were held between the principal EEO professional and the agency head, and documentation of decisions that impact the administration and operation of the EEO program was not maintained. **Corrective action required.**

**Corrective Action #9:** 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 in partial compliance with the standards for this subject area.**

22. 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, and administered, managerial and non-managerial performance evaluations for each year of the period in review.

23. 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 performance evaluation forms included the following: rating for EEO, *Accountability and Reporting Standards for Equal Opportunity Functions*, and states "Managers are responsible for: possessing a thorough understanding of the Equal Employment Opportunity Policy [creating an environment where there is equality of job opportunities], and establishing and maintaining a working relationship with the Agency EEO Officer."



**VIII. REPORTING STANDARD FOR AGENCY HEAD:**

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

24. Submit to the EEPC an Annual Plan of measures and programs to provide equal employment opportunity, and quarterly reports<sup>2</sup> (up to 30 days following each quarter) on efforts to implement the plan.

- During the period in review, the agency did not submit to the EEPC Annual Plans of measures and programs to provide equal employment opportunity, or quarterly reports (up to 30 days following each quarter) on efforts to implement each plan.

**Corrective Action #10** 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:**

1. 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 10 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*.

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<sup>2</sup>Submission of *Quarterly Reports on EEO Activity* is optional for non-Mayoral agencies.



(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,

A handwritten signature in blue ink, appearing to read "Nathan P. Conway".

Nathan P. Conway, EEO Program Analyst

Approved by,

A handwritten signature in black ink, appearing to read "Charise L. Terry".

Charise L. Terry, PRR  
Executive Director

c: Ines Grullon, Principal EEO Professional

**Appendix - 1**  
The Police Pension Fund  
EEO Job Group Descriptions

**DESCRIPTION OF  
CITYWIDE EQUAL EMPLOYMENT OPPORTUNITY DATABASE SYSTEM (CEEDS)  
JOB GROUP CATEGORIES**

**001 Administrators:** Occupations in which employees set broad policies and exercise overall responsibility for the execution of these policies. This category includes: elected officials, commissioners, executive directors, deputy commissioners, chairpersons, general counsels, controllers, chiefs of department, inspector generals and kindred workers.

**002 Managers:** Occupations in which employees direct individual departments or special phases of the agency's operations, or provide specialized consultation on a regional, district or area basis. This category includes: assistant commissioners, deputy directors, assistant directors, project managers, special assistants, superintendents, deputy counsels and kindred workers.

**003 Management Specialists:** Occupations which require specialized and theoretical knowledge of management, finance or personnel, which is usually acquired through college training or through work experience and other training which provides comparable knowledge. This category includes: accountants, underwriters, financial analysts, personnel analysts, staff analysts, program analysts, buyers, purchasing specialists, inspectors, research analysts, program officers, project coordinators and kindred workers.

**004 Science Professionals:** Occupations which require specialized and theoretical knowledge of various scientific or mathematical fields, which is usually acquired through college training or through work experience and other training which provides comparable knowledge. This category includes: architects, engineers (chemical, nuclear, civil, electrical, industrial, mechanical, marine), computer specialists, telecommunications specialists, actuaries, statisticians, physicists, chemists, geologists, biologists, foresters and kindred workers.

**005 Health Professionals:** Occupations which require specialized and theoretical knowledge of the medical or health fields, which is usually acquired through college training or through work experience and other training which provides comparable knowledge. This category includes: physicians, dentists, veterinarians, optometrists, podiatrists, registered nurses, pharmacists, dieticians, occupational therapists, physical therapists, speech therapists, physician's assistants and kindred workers.

**006 Social Scientists:** Occupations which require specialized and theoretical knowledge of the social sciences, which is usually acquired through college training or through work experience and other training which provides comparable knowledge. This category includes: librarians, archivists, economists, psychologists, sociologists, urban planners and kindred workers.

**007 Social Workers:** Occupations which require specialized and theoretical knowledge of social work, youth and family counseling, addiction treatment and casework, which is usually acquired through college or training or through work experience and other training which provides comparable knowledge. This category includes: caseworkers, probation officers, correctional counselors, juvenile counselors, addiction treatment counselors, eligibility specialists, human rights specialists, community liaison workers, clergy and kindred workers.

**008 Lawyers:** Occupations which require specialized and theoretical knowledge of the law and the judicial process, which is usually acquired through college training. This category includes: attorneys, assistant district attorneys, counsels, assistant counsels, deputy counsels, law judges, and kindred workers.

**009 Public Relations:** Occupations which require special knowledge or skills in public relations, journalism, modern language or the fine arts, which are usually acquired through college training, specialized post-secondary school education, or work experience or training which provides comparable knowledge. This category includes: technical writers, graphic designers, musicians, actors, directors, announcers, painters, illustrators, photographers, artists, editors, press officers, public relations specialists, public relations advisors, interpreters, customer service specialists and kindred workers.

**010 Technicians:** Occupations which require a combination of basic scientific or technical knowledge and manual skill which can be obtained through specialized post-secondary school education or through equivalent on-the-job training. This category includes: health technicians (clinical laboratory, dental hygienists, health records, radiologic

and licensed practical nurses), electrical and electronic technicians, engineering technicians (electrical, electronic, industrial, and mechanical), drafting occupations, surveying and mapping technicians, science technicians, airline pilots and navigators, air traffic controllers, broadcast equipment operators, computer programmers, legal assistants, investigators, and kindred workers.

**011 Sales:** Not applicable.

**012 Clerical Supervisors:** Occupations in which employees are responsible for overseeing and supervising the duties of clerical staff. This category includes: chief clerks, supervising clerks, principal administrative associates, supervising cashiers, telegraph superintendents, supervising stenographers and kindred workers.

**013 Clerical:** Occupations in which employees are responsible for internal and external communication, recording and retrieval of data and/or information and other paperwork required in an office. This category includes: cashiers, computer operators, word processors, secretaries, stenographers, typists, ticket agents, receptionists, clerks (information, personnel, file, library, records), bookkeepers, office machine operators, telephone operators, messengers, dispatchers, stock clerks, meter readers, office aides, general office clerks, bank tellers and kindred workers.

**014 Household Services:** Not applicable.

**015 Police Supervisors:** Occupations in which uniformed employees with peace officers status set broad policies in the area of public safety and security, exercise overall responsibility for execution of policies, direct individual units or special phases of the agency's operations, or supervise on a regional, district or area basis. This category includes: sergeants, captains, lieutenants, inspectors, captains (correction), wardens and kindred workers.

**016 Fire Supervisors:** Occupations in which uniformed employees set broad policies in the area of public safety and protection; exercise overall responsibility for execution of policies; direct individual units or special phases of the agency's operations; or supervise on a regional, district or area basis. This category includes: lieutenants, captains, battalion chiefs, deputy chiefs, supervising fire marshals, supervising fire prevention inspectors and kindred workers.

**017 Firefighters:** Occupations in which uniformed employees are entrusted with public safety, security and protection from destructive forces. This category includes: firefighters, marine engineers (uniformed), fire prevention inspectors, fire protection inspectors and kindred workers.

**018 Police and Detectives:** Occupations in which uniformed employees with peace officer status are entrusted with public safety, security and protection. This category includes: police officer, detectives, correction officers, bridge and tunnel officers, sheriffs, special officers, enforcement agents (traffic, sanitation) and kindred workers.

**019 Guards:** Occupations in which employees are entrusted with public safety and security. This category includes: school crossing guards, housing guards, watch persons, lifeguards, park rangers, school guards and kindred workers.

**020 Food Preparation:** Occupations in which employees are responsible for the preparation and distribution of food, or management of food services, in City facilities (e.g. schools, correctional institutions, and concessions). This category includes: cooks, school lunch helpers, school lunch managers, food service managers, commissary managers and kindred workers.

**021 Health Services:** Occupations in which employees are responsible for assisting health professionals in maintaining and promoting the health, hygiene and safety of the general public. This category includes: dental assistants, dietary aides, public health assistants, nurse's aides, institutional aides, health aides, orderlies, and kindred workers.

**022 Building Services:** Occupations in which employees perform duties which result in or contribute to the upkeep and care of buildings and facilities. This category includes: custodians, cleaners, caretakers, maintainers, elevator operators and starters, exterminators, pest control aides and kindred workers.



**023 Personal Services:** Occupations in which employees perform duties which result in or contribute to the comfort or convenience of the general public. This category includes: housekeepers, barbers, attendants, railroad porters, homemakers, matrons and kindred workers.

**024 Farming:** Occupations in which employees perform duties which result in or contribute to the upkeep and care of agricultural/botanical/zoological facilities or grounds of public property. This category includes: herbarium aides, aquarium technicians, botanical gardening aides, gardeners, groundskeepers, pruners, hostlers, menagerie keepers, horseshoers and kindred workers.

**025 Craft:** Occupations in which employees perform duties which require special manual skill and a thorough and comprehensive knowledge of the processes involved in the work in which is acquired through on-the-job training and experience or through apprenticeship or other formal training programs. This category includes: mechanics, equipment repairers, telephone line installers, small instrument repairers, brick masons, carpenters, electricians, plumbers, mining occupations, tool and die makers, sheet metal workers, tailors, butchers, bakers, machine operators, locksmiths, precision handworking occupations and kindred workers.

**026 Operators:** Occupations in which employees perform duties which require specialized machine skills which are required through on-the-job training and experience or through apprenticeship or other formal training programs. This category includes: printing press operators, high pressure boiler operators, laundry workers and kindred workers.

**027 Transportation:** Occupations in which employees perform duties which require motor vehicle, bus, train, or other transportation operation skills which are acquired through on-the-job training and experience or through other formal training programs. This category includes: bus drivers, chauffeurs, motor vehicle operators, trainmasters, ferry terminal supervisors and kindred workers.

**028 Laborers:** Occupations in which employees perform duties which result in or contribute to the comfort, convenience, hygiene or safety of the general public, or which contribute to the upkeep and care of buildings and facilities. There are no job qualification requirements for titles in this category. This category includes: skilled craft helpers and apprentices, construction laborers, stock handlers, garage and service station related occupations, car cleaners, seasonal park helpers, track workers, assistant highway repairers and kindred workers.

**029 Sanitation Workers:** Occupations in which employees perform duties which result in or contribute to the cleanliness, hygiene and safety of the public domain. Qualification requirements, which include civil service examinations, exist for titles in this category. This category includes: sanitation workers, debris removers and kindred workers.

**030 Teachers:** Occupations which require specialized and theoretical knowledge of education and instructional methods, which is usually acquired through college training or through work experience and other training which provides comparable knowledge. This category includes: teachers, instructors, professors, lecturers, fitness instructors, graduate assistants, fellows, adjunct professors, substitute teachers, trade instructors, education/vocational counselors, education analysts, education officers, institutional instructors and kindred workers.

**031 Paraprofessionals:** Occupations in which employees perform some of the duties of a professional or technician in a supportive role, which usually requires less formal training and/or experience normally required for professional or technical status. Such positions may fall within an identified pattern of staff development and promotion. This category includes: administrative assistants, project associates, coordinators, community associates and assistants, community service aides, research associates, welfare service workers, child care workers and kindred workers.

**Appendix -2**  
**NYC Police Pension Fund**  
Workforce Composition Summary  
2<sup>nd</sup> Quarter of Fiscal Year 2017  
(End of Audit Period)

RUN DATE: 01/04/17  
 RUN TIME: 13:22:22.4

NEW YORK CITY DEPARTMENT OF CITYWIDE ADMINISTRATIVE SERVICES  
 CITYWIDE EQUAL EMPLOYMENT DATABASE SYSTEM (CEEDS)  
 WORK FORCE COMPOSITION SUMMARY  
 QUARTER 2 YEAR 2017 AGENCY 256 NYC POLICE PENSION FUND

PAGE: 149  
 REPORT: EBEPR210

AGENCY CODE : 256 NYC POLICE PENSION FUND  
 EEO JOB GROUP : 001 ADMINISTRATORS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP	
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN			
95007	EXECUTIVE DIRECTOR (POLICE	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1
95008	DEPUTY EXECUTIVE DIRECTOR	2	0	0	0	0	0	0	0	0	0	0	0	0	0	2
EEO JOB GROUP TOTAL.....:		3	0	0	0	0	0	0	0	0	0	0	0	0	0	3
		100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00

AGENCY CODE : 256 NYC POLICE PENSION FUND  
 EEO JOB GROUP : 002 MANAGERS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP	
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN			
10001	ADMINISTRATIVE ACCOUNTANT	1	0	0	0	0	0	0	0	0	1	0	0	0	0	2
10047	ADMINISTRATIVE REAL PROPER	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1
10050	COMPUTER SYSTEMS MANAGER	4	0	1	0	0	0	0	0	0	0	0	0	0	0	5
82976	ADMINISTRATIVE PROCUREMENT	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
82986	ADMINISTRATIVE RETIREMENT	5	0	0	1	0	0	2	2	0	3	0	0	0	0	13
82994	ADMINISTRATIVE LABOR RELAT	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1
95005	EXECUTIVE AGENCY COUNSEL	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1
EEO JOB GROUP TOTAL.....:		11	0	1	1	0	0	4	3	0	4	0	0	0	0	24
		45.82	0.00	4.17	4.17	0.00	0.00	16.67	12.50	0.00	16.67	0.00	0.00	0.00	0.00	100.00

AGENCY CODE : 256 NYC POLICE PENSION FUND  
 EEO JOB GROUP : 003 MANAGEMENT SPECIALISTS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP	
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN			
1002C	ADMINISTRATIVE MANAGER NON	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
1002D	ADMINISTRATIVE STAFF ANALY	1	1	0	0	0	0	0	0	0	0	0	0	0	0	2
1002E	ADMINISTRATIVE STAFF ANALY	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1
40502	MANAGEMENT AUDITOR	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1
40510	ACCOUNTANT	1	1	0	0	0	0	1	0	0	3	0	0	0	0	6
EEO JOB GROUP TOTAL.....:		3	3	0	0	0	0	1	0	0	4	0	0	0	0	11
		27.28	27.27	0.00	0.00	0.00	0.00	9.09	0.00	0.00	36.36	0.00	0.00	0.00	0.00	100.00

AGENCY CODE : 256 NYC POLICE PENSION FUND  
 EEO JOB GROUP : 004 SCIENCE PROFESSIONALS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN		

RUN DATE: 01/04/17  
 RUN TIME: 13:22:22.4

NEW YORK CITY DEPARTMENT OF CITYWIDE ADMINISTRATIVE SERVICES  
 CITYWIDE EQUAL EMPLOYMENT DATABASE SYSTEM (CEEDS)  
 WORK FORCE COMPOSITION SUMMARY

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QUARTER 2 YEAR 2017 AGENCY 256 NYC POLICE PENSION FUND

13631	COMPUTER ASSOCIATE (SOFTWA	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1
13632	COMPUTER SPECIALIST (SOFTW	1	0	0	2	0	0	1	0	1	0	0	0	0	0	5
13651	COMPUTER PROGRAMMER ANALYS	0	0	0	0	0	0	0	0	0	1	0	0	0	1	
13691	*CERTIFIED LOCAL AREA NETW	0	0	0	1	0	0	0	0	0	0	0	0	0	1	
40610	STATISTICIAN	0	0	0	0	0	0	0	0	0	1	0	0	0	1	

EEO JOB GROUP TOTAL.....:		1	0	1	3	0	0	1	0	1	2	0	0	0	0	9
		11.12	0.00	11.11	33.33	0.00	0.00	11.11	0.00	11.11	22.22	0.00	0.00	0.00	100.00	

AGENCY CODE : 256 NYC POLICE PENSION FUND  
 EEO JOB GROUP : 008 LAWYERS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP	
		WHITE	BLACK	HISPAN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPAN	ASIAN PACIS	AM IND ALASK	UN-KNOWN			
30087	AGENCY ATTORNEY	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1
EEO JOB GROUP TOTAL.....:		1	0	0	0	0	0	0	0	0	0	0	0	0	0	1
		100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00	

AGENCY CODE : 256 NYC POLICE PENSION FUND  
 EEO JOB GROUP : 010 TECHNICIANS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP	
		WHITE	BLACK	HISPAN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPAN	ASIAN PACIS	AM IND ALASK	UN-KNOWN			
30080	PARALEGAL AIDE	0	0	0	0	0	0	1	1	0	0	0	0	0	0	2
40491	ASSISTANT RETIREMENT BENEF	1	1	1	4	0	0	1	1	0	0	0	0	0	0	9
40493	ASSOCIATE RETIREMENT BENEF	3	0	1	0	0	0	1	1	2	2	0	0	0	0	10
EEO JOB GROUP TOTAL.....:		4	1	2	4	0	0	3	3	2	2	0	0	0	0	21
		19.05	4.76	9.52	19.05	0.00	0.00	14.29	14.29	9.52	9.52	0.00	0.00	0.00	100.00	

AGENCY CODE : 256 NYC POLICE PENSION FUND  
 EEO JOB GROUP : 012 CLERICAL SUPERVISORS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP	
		WHITE	BLACK	HISPAN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPAN	ASIAN PACIS	AM IND ALASK	UN-KNOWN			
10124	PRINCIPAL ADMINISTRATIVE A	0	0	0	0	0	0	1	2	0	1	0	0	0	0	4
EEO JOB GROUP TOTAL.....:		0	0	0	0	0	0	1	2	0	1	0	0	0	0	4
		0.00	0.00	0.00	0.00	0.00	0.00	25.00	50.00	0.00	25.00	0.00	0.00	0.00	100.00	

AGENCY CODE : 256 NYC POLICE PENSION FUND  
 EEO JOB GROUP : 013 CLERICAL

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP
		WHITE	BLACK	HISPAN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPAN	ASIAN PACIS	AM IND ALASK	UN-KNOWN		

RUN DATE: 01/04/17  
 RUN TIME: 13:22:22.4

NEW YORK CITY DEPARTMENT OF CITYWIDE ADMINISTRATIVE SERVICES  
 CITYWIDE EQUAL EMPLOYMENT DATABASE SYSTEM (CEEDS)  
 WORK FORCE COMPOSITION SUMMARY  
 AGENCY 256 NYC POLICE PENSION FUND

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QUARTER 2 YEAR 2017

10251 CLERICAL ASSOCIATE	2	1	0	2	0	0	5	6	0	0	0	0	0	16
11704 SUPERVISOR OF OFFICE MACHI	0	1	0	0	0	0	0	1	0	0	0	0	0	2
12797 SECRETARY TO THE EXECUTIVE	1	0	0	0	0	0	0	0	0	0	0	0	0	1
EEO JOB GROUP TOTAL.....:	3	2	0	2	0	0	5	7	0	0	0	0	0	19
	15.78	10.53	0.00	10.53	0.00	0.00	26.32	36.84	0.00	0.00	0.00	0.00	0.00	100.00

AGENCY CODE : 256 NYC POLICE PENSION FUND  
 EEO JOB GROUP : 031 PARA PROFESSIONAL OCCUPATIONS

TITLE CODE	TITLE DESCRIPTION	MALE						FEMALE						OTHER	TOTAL EMP
		WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN	WHITE	BLACK	HISPN	ASIAN PACIS	AM IND ALASK	UN-KNOWN		
10209	COLLEGE AIDE	6	2	1	2	0	0	5	0	3	1	0	1	0	21
12749	STAFF ANALYST TRAINEE	1	0	0	0	0	0	0	0	0	0	0	0	1	
56056	COMMUNITY ASSISTANT	1	0	1	0	0	0	1	2	1	0	0	0	6	
56057	COMMUNITY ASSOCIATE	6	2	2	0	0	0	7	5	2	0	0	1	25	
56058	COMMUNITY COORDINATOR	1	0	1	0	0	0	1	2	2	0	0	0	7	
EEO JOB GROUP TOTAL.....:		15	4	5	2	0	0	14	9	8	1	0	2	60	
		25.01	6.67	8.33	3.33	0.00	0.00	23.33	15.00	13.33	1.67	0.00	3.33	100.00	

-----  
 AGENCY TOTAL.....: 41 10 9 12 0 0 29 24 11 14 0 2 0 152  
 26.97 6.58 5.92 7.89 0.00 0.00 19.08 15.79 7.24 9.21 0.00 1.32 0.00 100.00

**Appendix -3**  
**NYC Police Pension Fund**  
Workforce Compared with Internal and External Pools  
1st Quarter of Fiscal Year 2016

RUN DATE: 10/03/15  
 RUN TIME: 9:28:31  
 FY2016 Q1

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: 391  
 PROGRAM: EBPPP961  
 EXTRACT DATE: 09/30/15

AGENCY: 256 NYC POLICE PENSION FUND  
 JOB GROUP: 001 ADMINISTRATORS

PERSONS WITH MISSING EEO DATA INCLUDED IN CNTS  
 PROBABILITY CUT-OFF FOR IMBALANCE: 0.05

USING BINOMIAL TEST

EEO VAR	EEO VAL	FOCAL GROUP	OTHER THAN FOCAL GROUP	TOTAL	AVAIL %	EXPECTED #	DIFFERENCE	Z-SCORE	PROBABILITY	IMBAL
ETH	WHITE	3	0	3	.5092	1.53	1.47	1.70	0.045	N - N<=8
ETH	BLACK	0	3	3	.1745	0.52	-0.52	-0.80	0.213	N - N<=8
ETH	HISPANIC	0	3	3	.1543	0.46	-0.46	-0.74	0.230	N - N<=8
ETH	ASIAN / PAC ISL	0	3	3	.1123	0.34	-0.34	-0.62	0.269	N - N<=8
ETH	NATIVE AMERICAN	0	3	3	.0068	0.02	-0.02	-0.14	0.443	N - N<=8
ETH	ETH UNKNOWN	0	3	3	.0247	0.07	-0.07	-0.28	0.391	N - N<=8
GEN	MALE	3	0	3	.5906	1.77	1.23	1.44	0.075	N - N<=8
GEN	FEMALE	0	3	3	.3841	1.15	-1.15	-1.37	0.086	N - N<=8
GEN	GENDER UNKNOWN	0	3	3	.0046	0.01	-0.01	-0.12	0.453	N - N<=8

RUN DATE: 10/03/15  
 RUN TIME: 9:28:31  
 FY2016 Q1

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: 392  
 PROGRAM: EBPPP961  
 EXTRACT DATE: 09/30/15

AGENCY: 256 NYC POLICE PENSION FUND  
 JOB GROUP: 002 MANAGERS

PERSONS WITH MISSING EEO DATA INCLUDED IN CNTS  
 PROBABILITY CUT-OFF FOR IMBALANCE: 0.05

USING BINOMIAL TEST

EEO VAR	EEO VAL	FOCAL GROUP	OTHER THAN FOCAL GROUP	TOTAL	AVAIL %	EXPECTED #	DIFFERENCE	Z-SCORE	PROBABILITY	IMBAL
ETH	WHITE	13	8	21	.5133	10.78	2.22	0.97	0.166	
ETH	BLACK	3	18	21	.1889	3.97	-0.97	-0.54	0.295	N-05%RUL
ETH	HISPANIC	1	20	21	.1297	2.72	-1.72	-1.12	0.131	U-80%RUL
ETH	ASIAN / PAC ISL	4	17	21	.1017	2.14	1.86	1.35	0.089	
ETH	NATIVE AMERICAN	0	21	21	.0018	0.04	-0.04	-0.19	0.423	N-05%RUL
ETH	ETH UNKNOWN	0	21	21	.0402	0.84	-0.84	-0.94	0.174	N-05%RUL
GEN	MALE	11	10	21	.5345	11.22	-0.22	-0.10	0.461	
GEN	FEMALE	10	11	21	.4206	8.83	1.17	0.52	0.303	
GEN	GENDER UNKNOWN	0	21	21	.0197	0.41	-0.41	-0.65	0.258	N-05%RUL



RUN DATE: 10/03/15  
 RUN TIME: 9:28:31  
 FY2016 Q1

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: 394  
 PROGRAM: EBPPP961  
 EXTRACT DATE: 09/30/15

AGENCY: 256 NYC POLICE PENSION FUND  
 JOB GROUP: 004 SCIENCE PROFNS

PERSONS WITH MISSING EEO DATA INCLUDED IN CNTS  
 PROBABILITY CUT-OFF FOR IMBALANCE: 0.05

USING BINOMIAL TEST

EEO VAR	EEO VAL	FOCAL GROUP	OTHER THAN FOCAL GROUP	TOTAL	AVAIL %	EXPECTED #	DIFFERENCE	Z-SCORE	PROBABILITY	IMBAL
ETH	WHITE	2	5	7	.4568	3.20	-1.20	-0.91	0.182	N - N<=8
ETH	BLACK	0	7	7	.1762	1.23	-1.23	-1.22	0.111	N - N<=8
ETH	HISPANIC	2	5	7	.1023	0.72	1.28	1.60	0.055	N - N<=8
ETH	ASIAN / PAC ISL	3	4	7	.2258	1.58	1.42	1.28	0.100	N - N<=8
ETH	NATIVE AMERICAN	0	7	7	.0024	0.02	-0.02	-0.13	0.448	N - N<=8
ETH	ETH UNKNOWN	0	7	7	.0315	0.22	-0.22	-0.48	0.317	N - N<=8
GEN	MALE	5	2	7	.6586	4.61	0.39	0.31	0.378	N - N<=8
GEN	FEMALE	2	5	7	.3131	2.19	-0.19	-0.16	0.438	N - N<=8
GEN	GENDER UNKNOWN	0	7	7	.0201	0.14	-0.14	-0.38	0.352	N - N<=8

RUN DATE: 10/03/15  
 RUN TIME: 9:28:31  
 FY2016 Q1

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: 393  
 PROGRAM: EBP961  
 EXTRACT DATE: 09/30/15

AGENCY: 256 NYC POLICE PENSION FUND  
 JOB GROUP: 003 MNGMNT SPECS

PERSONS WITH MISSING EEO DATA INCLUDED IN CNTS  
 PROBABILITY CUT-OFF FOR IMBALANCE: 0.05

USING BINOMIAL TEST

EEO VAR	EEO VAL	FOCAL GROUP	OTHER THAN FOCAL GROUP	TOTAL	AVAIL %	EXPECTED #	DIFFERENCE	Z-SCORE	PROBABILITY	IMBAL
ETH	WHITE	5	6	11	.4094	4.50	0.50	0.30	0.380	
ETH	BLACK	2	9	11	.2958	3.25	-1.25	-0.83	0.204	U-80%RUL
ETH	HISPANIC	0	11	11	.1295	1.42	-1.42	-1.28	0.100	U-80%RUL
ETH	ASIAN / PAC ISL	4	7	11	.1301	1.43	2.57	2.30	0.011	O
ETH	NATIVE AMERICAN	0	11	11	.0022	0.02	-0.02	-0.16	0.438	N-05%RUL
ETH	ETH UNKNOWN	0	11	11	.0207	0.23	-0.23	-0.48	0.315	N-05%RUL
GEN	MALE	6	5	11	.5718	6.29	-0.29	-0.18	0.430	
GEN	FEMALE	5	6	11	.4032	4.44	0.56	0.35	0.364	
GEN	GENDER UNKNOWN	0	11	11	.0126	0.14	-0.14	-0.37	0.354	N-05%RUL

RUN DATE: 10/03/15  
 RUN TIME: 9:28:31  
 FY2016 Q1

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: 396  
 PROGRAM: EBPPP961  
 EXTRACT DATE: 09/30/15

AGENCY: 256 NYC POLICE PENSION FUND  
 JOB GROUP: 010 TECHNICIANS

PERSONS WITH MISSING EEO DATA INCLUDED IN CNTS  
 PROBABILITY CUT-OFF FOR IMBALANCE: 0.05

USING BINOMIAL TEST

EEO VAR	EEO VAL	FOCAL GROUP	OTHER THAN FOCAL GROUP	TOTAL	AVAIL %	EXPECTED #	DIFFERENCE	Z-SCORE	PROBABILITY	IMBAL
ETH	WHITE	7	14	21	.3514	7.38	-0.38	-0.17	0.431	
ETH	BLACK	5	16	21	.3293	6.92	-1.92	-0.89	0.187	U-80%RUL
ETH	HISPANIC	4	17	21	.1923	4.04	-0.04	-0.02	0.492	
ETH	ASIAN / PAC ISL	5	16	21	.1005	2.11	2.89	2.10	0.018	O
ETH	NATIVE AMERICAN	0	21	21	.0027	0.06	-0.06	-0.24	0.406	N-05%RUL
ETH	ETH UNKNOWN	0	21	21	.0182	0.38	-0.38	-0.62	0.266	N-05%RUL
GEN	MALE	9	12	21	.6181	12.98	-3.98	-1.79	0.037	U-80%RUL
GEN	FEMALE	12	9	21	.3662	7.69	4.31	1.95	0.025	
GEN	GENDER UNKNOWN	0	21	21	.0098	0.21	-0.21	-0.46	0.324	N-05%RUL

RUN DATE: 10/03/15  
 RUN TIME: 9:28:31  
 FY2016 Q1

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: 395  
 PROGRAM: EBPPP961  
 EXTRACT DATE: 09/30/15

AGENCY: 256 NYC POLICE PENSION FUND  
 JOB GROUP: 008 LAWYERS

PERSONS WITH MISSING EEO DATA INCLUDED IN CNTS  
 PROBABILITY CUT-OFF FOR IMBALANCE: 0.05

USING BINOMIAL TEST

EEO VAR	EEO VAL	FOCAL GROUP	OTHER THAN FOCAL GROUP	TOTAL	AVAIL %	EXPECTED #	DIFFERENCE	Z-SCORE	PROBABILITY	IMBAL
ETH	WHITE	1	0	1	.5889	0.59	0.41	0.84	0.202	N - N<=8
ETH	BLACK	0	1	1	.1310	0.13	-0.13	-0.39	0.349	N - N<=8
ETH	HISPANIC	0	1	1	.1020	0.10	-0.10	-0.34	0.368	N - N<=8
ETH	ASIAN / PAC ISL	0	1	1	.0721	0.07	-0.07	-0.28	0.390	N - N<=8
ETH	NATIVE AMERICAN	0	1	1	.0011	0.00	-0.00	-0.03	0.487	N - N<=8
ETH	ETH UNKNOWN	0	1	1	.0200	0.02	-0.02	-0.14	0.443	N - N<=8
GEN	MALE	1	0	1	.4396	0.44	0.56	1.13	0.129	N - N<=8
GEN	FEMALE	0	1	1	.4738	0.47	-0.47	-0.95	0.171	N - N<=8
GEN	GENDER UNKNOWN	0	1	1	.0010	0.00	-0.00	-0.03	0.487	N - N<=8

RUN DATE: 10/03/15  
 RUN TIME: 9:28:31  
 FY2016 Q1

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: 397  
 PROGRAM: EBPPP961  
 EXTRACT DATE: 09/30/15

AGENCY: 256 NYC POLICE PENSION FUND  
 JOB GROUP: 012 CLERICAL SUPS

PERSONS WITH MISSING EEO DATA INCLUDED IN CNTS  
 PROBABILITY CUT-OFF FOR IMBALANCE: 0.05

USING BINOMIAL TEST

EEO VAR	EEO VAL	FOCAL GROUP	OTHER THAN FOCAL GROUP	TOTAL	AVAIL %	EXPECTED #	DIFFERENCE	Z-SCORE	PROBABILITY	IMBAL
ETH	WHITE	1	5	6	.2238	1.34	-0.34	-0.34	0.369	N - N<=8
ETH	BLACK	3	3	6	.5619	3.37	-0.37	-0.31	0.380	N - N<=8
ETH	HISPANIC	2	4	6	.1348	0.81	1.19	1.42	0.077	N - N<=8
ETH	ASIAN / PAC ISL	0	6	6	.0511	0.31	-0.31	-0.57	0.285	N - N<=8
ETH	NATIVE AMERICAN	0	6	6	.0038	0.02	-0.02	-0.15	0.440	N - N<=8
ETH	ETH UNKNOWN	0	6	6	.0245	0.15	-0.15	-0.39	0.349	N - N<=8
GEN	MALE	1	5	6	.2093	1.26	-0.26	-0.26	0.399	N - N<=8
GEN	FEMALE	5	1	6	.7769	4.66	0.34	0.33	0.370	N - N<=8
GEN	GENDER UNKNOWN	0	6	6	.0138	0.08	-0.08	-0.29	0.386	N - N<=8

RUN DATE: 10/03/15  
 RUN TIME: 9:28:31  
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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: 398  
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AGENCY: 256 NYC POLICE PENSION FUND  
 JOB GROUP: 013 CLERICAL

PERSONS WITH MISSING EEO DATA INCLUDED IN CNTS  
 PROBABILITY CUT-OFF FOR IMBALANCE: 0.05

USING BINOMIAL TEST

EEO VAR	EEO VAL	FOCAL GROUP	OTHER THAN FOCAL GROUP	TOTAL	AVAIL %	EXPECTED #	DIFFERENCE	Z-SCORE	PROBABILITY	IMBAL
ETH	WHITE	8	11	19	.1867	3.55	4.45	2.62	<.01	O
ETH	BLACK	8	11	19	.5347	10.16	-2.16	-0.99	0.160	U-80%RUL
ETH	HISPANIC	0	19	19	.1509	2.87	-2.87	-1.84	0.033	U-80%RUL
ETH	ASIAN / PAC ISL	3	16	19	.0716	1.36	1.64	1.46	0.072	
ETH	NATIVE AMERICAN	0	19	19	.0039	0.07	-0.07	-0.27	0.393	N-05%RUL
ETH	ETH UNKNOWN	0	19	19	.0478	0.91	-0.91	-0.98	0.164	N-05%RUL
GEN	MALE	8	11	19	.2820	5.36	2.64	1.35	0.089	
GEN	FEMALE	11	8	19	.6776	12.87	-1.87	-0.92	0.179	
GEN	GENDER UNKNOWN	0	19	19	.0359	0.68	-0.68	-0.84	0.200	N-05%RUL

RUN DATE: 10/03/15  
 RUN TIME: 9:28:31  
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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

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AGENCY: 256 NYC POLICE PENSION FUND  
 JOB GROUP: 031 PARA PROFESSION

PERSONS WITH MISSING EEO DATA INCLUDED IN CNTS  
 PROBABILITY CUT-OFF FOR IMBALANCE: 0.05

USING BINOMIAL TEST

EEO VAR	EEO VAL	FOCAL GROUP	OTHER THAN FOCAL GROUP	TOTAL	AVAIL %	EXPECTED #	DIFFERENCE	Z-SCORE	PROBABILITY	IMBAL
ETH	WHITE	33	34	67	.3243	21.73	11.27	2.94	<.01	O
ETH	BLACK	16	51	67	.2673	17.91	-1.91	-0.53	0.299	
ETH	HISPANIC	15	52	67	.2449	16.41	-1.41	-0.40	0.345	
ETH	ASIAN / PAC ISL	1	66	67	.0964	6.46	-5.46	-2.26	0.012	U
ETH	NATIVE AMERICAN	0	67	67	.0025	0.17	-0.17	-0.41	0.341	N-05%RUL
ETH	ETH UNKNOWN	2	65	67	.0269	1.80	0.20	0.15	0.441	
GEN	MALE	31	36	67	.3798	25.45	5.55	1.40	0.081	
GEN	FEMALE	36	31	67	.5812	38.94	-2.94	-0.73	0.233	
GEN	GENDER UNKNOWN	0	67	67	.0011	0.07	-0.07	-0.27	0.393	N-05%RUL

**Appendix -4**  
**NYC Police Pension Fund**  
Workforce Compared with Internal and External Pools  
2nd Quarter of Fiscal Year 2016



RUN DATE: 01/05/16  
 RUN TIME: 8:35:10  
 FY2016 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: 393  
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AGENCY: 256 NYC POLICE PENSION FUND  
 JOB GROUP: 001 ADMINISTRATORS

PERSONS WITH MISSING EEO DATA INCLUDED IN CNTS  
 PROBABILITY CUT-OFF FOR IMBALANCE: 0.05

USING BINOMIAL TEST

EEO VAR	EEO VAL	FOCAL GROUP	OTHER THAN FOCAL GROUP	TOTAL	AVAIL %	EXPECTED #	DIFFERENCE	Z-SCORE	PROBABILITY	IMBAL
ETH	WHITE	3	0	3	.5092	1.53	1.47	1.70	0.045	N - N<=8
ETH	BLACK	0	3	3	.1745	0.52	-0.52	-0.80	0.213	N - N<=8
ETH	HISPANIC	0	3	3	.1543	0.46	-0.46	-0.74	0.230	N - N<=8
ETH	ASIAN / PAC ISL	0	3	3	.1123	0.34	-0.34	-0.62	0.269	N - N<=8
ETH	NATIVE AMERICAN	0	3	3	.0068	0.02	-0.02	-0.14	0.443	N - N<=8
ETH	ETH UNKNOWN	0	3	3	.0247	0.07	-0.07	-0.28	0.391	N - N<=8
GEN	MALE	3	0	3	.5906	1.77	1.23	1.44	0.075	N - N<=8
GEN	FEMALE	0	3	3	.3841	1.15	-1.15	-1.37	0.086	N - N<=8
GEN	GENDER UNKNOWN	0	3	3	.0046	0.01	-0.01	-0.12	0.453	N - N<=8

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NEW YORK CITY DEPARTMENT OF PERSONNEL  
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AGENCY: 256 NYC POLICE PENSION FUND  
 JOB GROUP: 002 MANAGERS

PERSONS WITH MISSING EEO DATA INCLUDED IN CNTS  
 PROBABILITY CUT-OFF FOR IMBALANCE: 0.05

USING BINOMIAL TEST

EEO VAR	EEO VAL	FOCAL GROUP	OTHER THAN FOCAL GROUP	TOTAL	AVAIL %	EXPECTED #	DIFFERENCE	Z-SCORE	PROBABILITY	IMBAL
ETH	WHITE	14	7	21	.5133	10.78	3.22	1.41	0.080	
ETH	BLACK	2	19	21	.1889	3.97	-1.97	-1.10	0.136	U-80%RUL
ETH	HISPANIC	1	20	21	.1297	2.72	-1.72	-1.12	0.131	U-80%RUL
ETH	ASIAN / PAC ISL	4	17	21	.1017	2.14	1.86	1.35	0.089	
ETH	NATIVE AMERICAN	0	21	21	.0018	0.04	-0.04	-0.19	0.423	N-05%RUL
ETH	ETH UNKNOWN	0	21	21	.0402	0.84	-0.84	-0.94	0.174	N-05%RUL
GEN	MALE	12	9	21	.5345	11.22	0.78	0.34	0.367	
GEN	FEMALE	9	12	21	.4206	8.83	0.17	0.07	0.471	
GEN	GENDER UNKNOWN	0	21	21	.0197	0.41	-0.41	-0.65	0.258	N-05%RUL

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NEW YORK CITY DEPARTMENT OF PERSONNEL  
 C E E D S S Y S T E M  
 WORK FORCE COMPARED WITH INTERNAL & EXTERNAL POOLS  
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AGENCY: 256 NYC POLICE PENSION FUND  
 JOB GROUP: 003 MNGMNT SPECS

PERSONS WITH MISSING EEO DATA INCLUDED IN CNTS  
 PROBABILITY CUT-OFF FOR IMBALANCE: 0.05

USING BINOMIAL TEST

EEO VAR	EEO VAL	FOCAL GROUP	OTHER THAN FOCAL GROUP	TOTAL	AVAIL %	EXPECTED #	DIFFERENCE	Z-SCORE	PROBABILITY	IMBAL
ETH	WHITE	5	6	11	.4094	4.50	0.50	0.30	0.380	
ETH	BLACK	2	9	11	.2958	3.25	-1.25	-0.83	0.204	U-80%RUL
ETH	HISPANIC	0	11	11	.1295	1.42	-1.42	-1.28	0.100	U-80%RUL
ETH	ASIAN / PAC ISL	4	7	11	.1301	1.43	2.57	2.30	0.011	O
ETH	NATIVE AMERICAN	0	11	11	.0022	0.02	-0.02	-0.16	0.438	N-05%RUL
ETH	ETH UNKNOWN	0	11	11	.0207	0.23	-0.23	-0.48	0.315	N-05%RUL
GEN	MALE	6	5	11	.5718	6.29	-0.29	-0.18	0.430	
GEN	FEMALE	5	6	11	.4032	4.44	0.56	0.35	0.364	
GEN	GENDER UNKNOWN	0	11	11	.0126	0.14	-0.14	-0.37	0.354	N-05%RUL

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NEW YORK CITY DEPARTMENT OF PERSONNEL  
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AGENCY: 256 NYC POLICE PENSION FUND  
 JOB GROUP: 004 SCIENCE PROFNS

PERSONS WITH MISSING EEO DATA INCLUDED IN CNTS  
 PROBABILITY CUT-OFF FOR IMBALANCE: 0.05

USING BINOMIAL TEST

EEO VAR	EEO VAL	FOCAL GROUP	OTHER THAN FOCAL GROUP	TOTAL	AVAIL %	EXPECTED #	DIFFERENCE	Z-SCORE	PROBABILITY	IMBAL
ETH	WHITE	2	6	8	.4568	3.65	-1.65	-1.17	0.120	N - N<=8
ETH	BLACK	0	8	8	.1762	1.41	-1.41	-1.31	0.095	N - N<=8
ETH	HISPANIC	2	6	8	.1023	0.82	1.18	1.38	0.084	N - N<=8
ETH	ASIAN / PAC ISL	4	4	8	.2258	1.81	2.19	1.85	0.032	N - N<=8
ETH	NATIVE AMERICAN	0	8	8	.0024	0.02	-0.02	-0.14	0.445	N - N<=8
ETH	ETH UNKNOWN	0	8	8	.0315	0.25	-0.25	-0.51	0.305	N - N<=8
GEN	MALE	5	3	8	.6586	5.27	-0.27	-0.20	0.421	N - N<=8
GEN	FEMALE	3	5	8	.3131	2.50	0.50	0.38	0.353	N - N<=8
GEN	GENDER UNKNOWN	0	8	8	.0201	0.16	-0.16	-0.41	0.343	N - N<=8

RUN DATE: 01/05/16  
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NEW YORK CITY DEPARTMENT OF PERSONNEL  
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AGENCY: 256 NYC POLICE PENSION FUND  
 JOB GROUP: 008 LAWYERS

PERSONS WITH MISSING EEO DATA INCLUDED IN CNTS  
 PROBABILITY CUT-OFF FOR IMBALANCE: 0.05

USING BINOMIAL TEST

EEO VAR	EEO VAL	FOCAL GROUP	OTHER THAN FOCAL GROUP	TOTAL	AVAIL %	EXPECTED #	DIFFERENCE	Z-SCORE	PROBABILITY	IMBAL
ETH	WHITE	1	0	1	.5889	0.59	0.41	0.84	0.202	N - N<=8
ETH	BLACK	0	1	1	.1310	0.13	-0.13	-0.39	0.349	N - N<=8
ETH	HISPANIC	0	1	1	.1020	0.10	-0.10	-0.34	0.368	N - N<=8
ETH	ASIAN / PAC ISL	0	1	1	.0721	0.07	-0.07	-0.28	0.390	N - N<=8
ETH	NATIVE AMERICAN	0	1	1	.0011	0.00	-0.00	-0.03	0.487	N - N<=8
ETH	ETH UNKNOWN	0	1	1	.0200	0.02	-0.02	-0.14	0.443	N - N<=8
GEN	MALE	1	0	1	.4396	0.44	0.56	1.13	0.129	N - N<=8
GEN	FEMALE	0	1	1	.4738	0.47	-0.47	-0.95	0.171	N - N<=8
GEN	GENDER UNKNOWN	0	1	1	.0010	0.00	-0.00	-0.03	0.487	N - N<=8

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AGENCY: 256 NYC POLICE PENSION FUND  
 JOB GROUP: 010 TECHNICIANS

PERSONS WITH MISSING EEO DATA INCLUDED IN CNTS  
 PROBABILITY CUT-OFF FOR IMBALANCE: 0.05

USING BINOMIAL TEST

EEO VAR	EEO VAL	FOCAL GROUP	OTHER THAN FOCAL GROUP	TOTAL	AVAIL %	EXPECTED #	DIFFERENCE	Z-SCORE	PROBABILITY	IMBAL
ETH	WHITE	7	16	23	.3514	8.08	-1.08	-0.47	0.318	
ETH	BLACK	6	17	23	.3293	7.57	-1.57	-0.70	0.242	U-80%RUL
ETH	HISPANIC	4	19	23	.1923	4.42	-0.42	-0.22	0.411	
ETH	ASIAN / PAC ISL	6	17	23	.1005	2.31	3.69	2.56	<.01	O
ETH	NATIVE AMERICAN	0	23	23	.0027	0.06	-0.06	-0.25	0.401	N-05%RUL
ETH	ETH UNKNOWN	0	23	23	.0182	0.42	-0.42	-0.65	0.257	N-05%RUL
GEN	MALE	10	13	23	.6181	14.22	-4.22	-1.81	0.035	U-80%RUL
GEN	FEMALE	13	10	23	.3662	8.42	4.58	1.98	0.024	O
GEN	GENDER UNKNOWN	0	23	23	.0098	0.23	-0.23	-0.48	0.317	N-05%RUL

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AGENCY: 256 NYC POLICE PENSION FUND  
 JOB GROUP: 012 CLERICAL SUPS

PERSONS WITH MISSING EEO DATA INCLUDED IN CNTS  
 PROBABILITY CUT-OFF FOR IMBALANCE: 0.05

USING BINOMIAL TEST

EEO VAR	EEO VAL	FOCAL GROUP	OTHER THAN FOCAL GROUP	TOTAL	AVAIL %	EXPECTED #	DIFFERENCE	Z-SCORE	PROBABILITY	IMBAL
ETH	WHITE	1	5	6	.2238	1.34	-0.34	-0.34	0.369	N - N<=8
ETH	BLACK	3	3	6	.5619	3.37	-0.37	-0.31	0.380	N - N<=8
ETH	HISPANIC	2	4	6	.1348	0.81	1.19	1.42	0.077	N - N<=8
ETH	ASIAN / PAC ISL	0	6	6	.0511	0.31	-0.31	-0.57	0.285	N - N<=8
ETH	NATIVE AMERICAN	0	6	6	.0038	0.02	-0.02	-0.15	0.440	N - N<=8
ETH	ETH UNKNOWN	0	6	6	.0245	0.15	-0.15	-0.39	0.349	N - N<=8
GEN	MALE	1	5	6	.2093	1.26	-0.26	-0.26	0.399	N - N<=8
GEN	FEMALE	5	1	6	.7769	4.66	0.34	0.33	0.370	N - N<=8
GEN	GENDER UNKNOWN	0	6	6	.0138	0.08	-0.08	-0.29	0.386	N - N<=8

RUN DATE: 01/05/16  
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 C E E D S S Y S T E M  
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AGENCY: 256 NYC POLICE PENSION FUND  
 JOB GROUP: 013 CLERICAL

PERSONS WITH MISSING EEO DATA INCLUDED IN CNTS  
 PROBABILITY CUT-OFF FOR IMBALANCE: 0.05

USING BINOMIAL TEST

EEO VAR	EEO VAL	FOCAL GROUP	OTHER THAN FOCAL GROUP	TOTAL	AVAIL %	EXPECTED #	DIFFERENCE	Z-SCORE	PROBABILITY	IMBAL
ETH	WHITE	8	12	20	.1867	3.73	4.27	2.45	<.01	O
ETH	BLACK	9	11	20	.5347	10.69	-1.69	-0.76	0.224	
ETH	HISPANIC	0	20	20	.1509	3.02	-3.02	-1.89	0.030	U-80%RUL
ETH	ASIAN / PAC ISL	3	17	20	.0716	1.43	1.57	1.36	0.087	
ETH	NATIVE AMERICAN	0	20	20	.0039	0.08	-0.08	-0.28	0.390	N-05%RUL
ETH	ETH UNKNOWN	0	20	20	.0478	0.96	-0.96	-1.00	0.158	N-05%RUL
GEN	MALE	8	12	20	.2820	5.64	2.36	1.17	0.120	
GEN	FEMALE	12	8	20	.6776	13.55	-1.55	-0.74	0.229	
GEN	GENDER UNKNOWN	0	20	20	.0359	0.72	-0.72	-0.86	0.194	N-05%RUL



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AGENCY: 256 NYC POLICE PENSION FUND  
 JOB GROUP: 031 PARA PROFESSION

PERSONS WITH MISSING EEO DATA INCLUDED IN CNTS  
 PROBABILITY CUT-OFF FOR IMBALANCE: 0.05

USING BINOMIAL TEST

EEO VAR	EEO VAL	FOCAL GROUP	OTHER THAN FOCAL GROUP	TOTAL	AVAIL %	EXPECTED #	DIFFERENCE	Z-SCORE	PROBABILITY	IMBAL
ETH	WHITE	32	32	64	.3243	20.76	11.24	3.00	<.01	O
ETH	BLACK	15	49	64	.2673	17.11	-2.11	-0.60	0.276	
ETH	HISPANIC	14	50	64	.2449	15.67	-1.67	-0.49	0.313	
ETH	ASIAN / PAC ISL	1	63	64	.0964	6.17	-5.17	-2.19	0.014	U
ETH	NATIVE AMERICAN	0	64	64	.0025	0.16	-0.16	-0.40	0.344	N-05%RUL
ETH	ETH UNKNOWN	2	62	64	.0269	1.72	0.28	0.22	0.415	
GEN	MALE	29	35	64	.3798	24.31	4.69	1.21	0.113	
GEN	FEMALE	35	29	64	.5812	37.20	-2.20	-0.56	0.289	
GEN	GENDER UNKNOWN	0	64	64	.0011	0.07	-0.07	-0.27	0.395	N-05%RUL



# New York City Police Pension Fund

233 BROADWAY  
NEW YORK, NEW YORK 10279  
(212) 693-5100

Kevin Holloran  
Executive Director

June 12, 2017

Charise Terry, PHR  
Executive Director  
Equal Employment Practices Commission  
253 Broadway, Suite 602  
New York, New York 10007

RE: Preliminary Determination for Audit: Review, Evaluation and Monitoring of the NYC Police Pension Fund's Employment Practices and Procedures from July 1, 2014 to December 31, 2016

Dear Executive Director Terry:

Pursuant to Chapter 36, §831(d) (5) of the New York City Charter, the Equal Employment Practices Commission (EEPC) is mandated to conduct an audit and evaluate the employment practices, programs, and procedures of the New York City Police Pension Fund (NYCPPF) to evaluate its compliance with Equal Employment Opportunity (EEO) policy for the period from July 1, 2014 to December 31, 2016.

In accordance with your findings, the following required corrective actions will be implemented:

I. **Issuance, Distribution, and Posting of EEO Policies:**

**The EEO Policy statement did not include the most up to date protected classes.**

The Agency has updated the EEO Policy statement to include all EEO categories. It will be physically posted in common areas and added to the intranet.

II. **EEO Training for Agency**

**#1: The agency did not demonstrate that it established and implemented an EEO training program for new and existing employees.**

**Corrective Action #1:** Starting in the new fiscal year (FY'18) HR will begin EEO training for the entire Agency.

### III. Employment Practices (Recruitment, Hiring & Promotion)

**#2: The Agency did not demonstrate that it promoted employees awareness of opportunities for advancement through incentive programs; publicized promotions, including promotions into, or changes in, the managerial ranks; and/or using other methods to communicate internal opportunities.**

**Corrective Action #2:** Promote employees' awareness of opportunities for advancement and transfer within the Agency by: administering incentive programs; publicizing promotions, including promotions into, or changes in, the managerial ranks; and/or using other methods to communicate internal opportunities.

**#3: The Agency did not demonstrate that it considered incumbent employees for career enhancement, development opportunities, and transfer.**

**Corrective Action #3:** Since this audit, and prior to the receipt of the audit determination, HR has met with the staff, individually and in groups, to discuss career development in the public sector and the civil service process. With the beginning of the FY'18, DCAS will offer the new schedule of classes and training. The Agency will encourage all employees to attend a session or more of interest to them. HR sends information, via email, regarding notices for exam, as well as internal postings and postings via the intranet as jobs become available. All current employees' are interviewed if they apply to internal postings. Based on structured impartial interviews, the successful candidate is chosen by the unit supervisor. HR notifications are sent to staff when there are staff changes or new appointments. Mentorship programs to improve performance and skills; establishing internal talent pools via cross-training, cross divisional assignments, job transfers, and/or job rotation; and identifying successors with applicable knowledge/skills/abilities will be created and developed by HR as a result of this audit. NOTE: In the last year of the audit (2016), three (3) non-managerial female employees were promoted to the managerial ranks: one (1) Asian, one (1) Black and one (1) Caucasian.

**#4: The Agency did not demonstrate that, during the period in review, it used an applicant/candidate log or tracking system.**

**Corrective Action #4:** Currently, HR uses NYCAPS as an applicant/candidate log and tracking system. Beginning in FY'18, HR will create an applicant/ candidate log and internally track 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

**(#5): The Agency did not designate a professional with appropriate training, knowledge and familiarity with career opportunities in City government to provide career counseling to employees upon request.**

**Corrective Action #5:** The Agency will designate a professional (Career Counselor) with appropriate training, knowledge and familiarity with career opportunities to employees upon request in FY'18. Further, the "Career Counselor" will remind employees of the identity/type of guidance available at least once each year.

**#6: The Agency did not demonstrate that employees had access to information regarding job responsibilities, performance evaluations standards, examinations, training opportunities or job postings.**

**Corrective Action #6:** The Agency's intranet (DocuShare) has general information regarding Performance Evaluations. In FY'18, HR will expand the information on the intranet to include job responsibilities in each title used by the agency. HR will continue to email information regarding examinations, training opportunities and job postings on a regular basis to all employees.

#### **VI. Responsibility for EEO Plan Implementation – EEO Professionals**

**#7: The agency did not demonstrate that the principal EEO professional was trained and knowledgeable regarding city, state and EEO laws; the requirements of the Agency's EEO policies, standards and procedures; and the prevention, investigation, and resolution of discrimination complaints.**

**Corrective Action #7:** The EEO personnel have completed the online EEO training and have been issued certificates of completion. When DCAS publishes the new training schedule for FY'18, the Agency will register the EEO staff so that they are trained and knowledgeable regarding city, state, and 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. The Agency will appoint a principal EEO Professional who will be trained and become knowledgeable regarding city, state, and 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.

**#8: The Agency did not demonstrate that the EEO Counselor was trained in EEO laws and procedures and knew how to carry out their responsibilities under the EEO Policy.**

**Corrective Action #8:** Ensure that EEO professionals are trained in EEO laws and procedures and know how to carry out their responsibilities under the EEO policy.

**#9: During the period in review, no meetings were held between the principal EEO professional and the agency head, and documentation of decisions that impact the administration and operation of the EEO program was not maintained.**

**Corrective Action #9:** After EEO professional has received the required training, the Agency will set up a schedule of meetings with the EEO professional and the Agency Head (or a direct report other than the General Counsel) to maintain an updated EEO program for all employees. These meetings will be documented as well as any and all other communications between the Agency head and the Principal EEO professional regarding decisions that impact the administration and operation of the EEO program.

#### **VII. Reporting Standard for Agency Head**

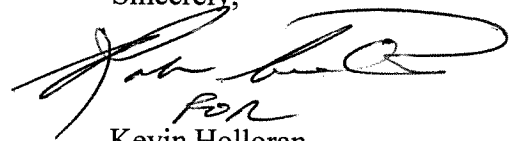
**#10: During the period in review, that agency did not submit to the EEPC Annual Plans of measures and programs to provide equal employment opportunity, or quarterly reports (up to 30 days following each quarter on efforts to implement each plan).**

**Corrective Action #10:** Henceforth, the Agency will submit to 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, the Agency Head will distribute 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.

If you have any questions regarding this response, please address them to Ms. Ellen J. Murphy, Director of Human Resources for NYCPPF. You can reach Ms. Murphy by telephone at (212) 693-5125 or by email: [emurphy@nycppf.org](mailto:emurphy@nycppf.org).

Sincerely,



FOR  
Kevin Holloran  
Executive Director

C: J. McLoughlin  
I. Grullon  
File



Angela Cabrera  
Malini Cadambi Daniel  
Elaine S. Reiss, Esq.  
Arva R. Rice  
Commissioners

Charise L. Terry, PHR  
Executive Director

Judith Garcia Quiñonez,  
Esq.  
Executive Agency Counsel/  
Deputy Director

253 Broadway  
Suite 602  
New York, NY 10007

212. 615. 8939 tel.  
212. 676.2724 fax

## BY MAIL AND EMAIL

June 20, 2017

Kevin Holloran  
Executive Director  
NYC Police Pension Fund  
233 Broadway, 19th Floor  
New York, NY 10279

RE: Audit Resolution #2017/211-256: Final Determination Pursuant to the Review, Evaluation and Monitoring of the NYC Police Pension Fund's Employment Practices and Procedures from July 1, 2014 to December 31, 2016.

Dear Executive Director Holloran:

On behalf of the members of the Equal Employment Practices Commission (Commission or EEPC), thank you for your June 12, 2017 response to our May 30, 2017 Preliminary Determination and for the cooperation extended to our staff during the course of this audit.

As indicated in our Preliminary Determination, this Commission has adopted uniform standards<sup>1</sup> to assess agencies' employment practices and programs 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. The attached Determination contains the Commission's findings and required corrective actions pertaining to the referenced review, evaluation and monitoring of your agency's employment practices and procedures.

Chapter 36, Section 832.c of the New York City Charter requires that: 1) the EEPC assign a 6-month compliance period to monitor your agency's efforts to eliminate remaining required corrective actions; and 2) the agency provide a written response within 30 days from the date of this letter indicating corrective action taken.

The assigned compliance-monitoring period is: **July 2017 to December 2017.**

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<sup>1</sup> 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; New York City Human Rights Law (NYC Administrative Code, §§8-107.1(a) and 8-107.13(d)); New York State Civil Service Law §55-a; Uniform Guidelines on Employee Selection Procedures (29 CFR §§1607.3 - 1607.7) and the equal employment opportunity requirements of the New York City Charter.



**If corrective actions remain:** Your agency's response should indicate what steps your agency has taken, or will take, to implement the corrective actions during the designated period. Documentation which supports the implementation of each corrective action shall be uploaded to TeamCentral, the EEPC's Automated Compliance-Monitoring System. Your agency will be monitored monthly until all corrective actions have been implemented. Instruction on how to access and navigate TeamCentral is attached. Upon your agency's completion of the final corrective action, this Commission requires that your agency upload a final memorandum signed by the agency head which informs employees of the changes implemented pursuant to our audit and re-emphasizes commitment to the EEO program. Upon receipt of the final memorandum, the EEPC will issue a *Determination of Compliance*.

**If no corrective actions remain:** Your agency is exempt from the aforementioned monitoring period. However, this Commission requires a final memorandum signed by the agency head which informs employees of the changes implemented pursuant to our audit and re-emphasizes commitment to the EEO program. This will be considered your agency's final action. Upon receipt of the memo, a *Determination of Compliance* will be issued.

If there are further questions regarding this Final Determination or the compliance-monitoring process, please have the Principal EEO Professional contact Nathan Conway, EEO Program Analyst at [naconway@eepc.nyc.gov](mailto:naconway@eepc.nyc.gov).

Thank you and your staff for your continued cooperation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Charise L. Terry".

Charise L. Terry, PHR  
Executive Director

C: Ines Grullon, Principal EEO Professional

**FINAL DETERMINATION**

Agency response indicating corrective action taken with documentation is due within 30 days.

The Equal Employment Practices Commission's findings and required corrective actions are based on the audit methodology which includes collection and analysis of the documents, records and data the agency provided in response to the *EEPC Document and Information Request Form*; the *EEPC Interview Questionnaires* for EEO professionals and others involved in EEO program administration; and, if applicable, the *EEPC Employee Survey*; the *EEPC Supervisor/Manager Survey*; the agency's *Annual EEO Plans and Quarterly EEO Reports*; and workforce and utilization data from the *Citywide Equal Employment Database System*. Additional research and follow-up discussions or interviews were conducted as appropriate.

After reviewing the agency's optional response<sup>2</sup> (if applicable) to the EEPC's preliminary Determination, our Final Determination is as follows:

**Monitoring Required**

The agency's implementation of the following required corrective actions will be monitored during the assigned compliance monitoring period.

**Corrective Action #1**

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.

Agency Response: *Starting in the new fiscal year (FY'18) HR will begin EEO training for the entire Agency.*

EEPC Response: Documentation that demonstrates implementation of corrective action #1 will be required during the compliance-monitoring period.

**Corrective Action #2**

Promote employees' awareness of opportunities for advancement and transfer within the agency by: administering incentive programs; publicizing promotions, including promotions into, or changes in, the managerial ranks; and/or using other methods to communicate internal opportunities.

Agency Response: *Since this audit, and prior to the receipt of the audit determination, HR has met with the staff, individually and in groups, to discuss career development in the public sector and the civil service process. With the beginning of the FY18, DCAS will offer the new schedule of classes and training. The Agency will encourage all employees to attend a session or more of interest to them. HR sends information, via email, regarding notices for exam, as well as internal postings and postings via the intranet as jobs become available. All current employees' are interviewed if they apply to internal postings. Based on structured impartial interviews, the successful candidate is chosen by the unit*

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<sup>2</sup> Excerpts are italicized.



supervisor. HR notifications are sent to staff when there are staff changes or new appointments. NOTE: In the last year of the audit (2016), three (3) non-managerial female employees were promoted to the managerial ranks: one (1) Asian, one (1) Black and one (1) Caucasian.

EEPC Response: Documentation that demonstrates implementation of corrective action #2 will be required during the compliance-monitoring period.

### **Corrective Action #3**

Ensure that employees are considered internally for career enhancement, development opportunities and transfer by: providing and encouraging training, development or mentorship programs to improve their performance and skills; establishing internal talent pools via cross-training, cross divisional assignments, job transfers, and/or job rotation; and identifying internal successors with applicable knowledge/skills/abilities.

Agency Response: Mentorship programs to improve performance and skills; establishing internal talent pools via cross-training , cross divisional assignments, job transfers, and/or job rotation; and identifying successors with applicable knowledge/skills/abilities will be created and developed by HR as a result of this audit.

EEPC Response: Documentation that demonstrates implementation of corrective action #3 will be required during the compliance-monitoring period. The EEPC will provide further guidance upon initiation of the compliance-monitoring period.

### **Corrective Action #4**

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.

Agency Response: Currently, HR uses NYCAPS as an applicant/candidate log and tracking system. Beginning in FY'18, HR will create an applicant/ candidate log and internally track 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.

EEPC Response: The EEPC recognizes the agency's commitment to implement corrective action #4. The use of NYCAPS eHire enables the agency to capture the required information; the EEPC does not require a supplementary tracking system. Documentation that demonstrates implementation of this corrective action will be required during the compliance-monitoring period.

**Corrective Action #5**

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.

Agency Response: *The Agency will designate a professional (Career Counselor) with appropriate training, knowledge and familiarity with career opportunities to employees upon request in FY'18. Further, the "Career Counselor" will remind employees of the identity/type of guidance available at least once each year.*

EEPC Response: The EEPC recognizes the agency's commitment to implement corrective action #5. Documentation that demonstrates implementation of corrective action #5 will be required during the compliance-monitoring period.

**Corrective Action #6**

Ensure that employees have access to information regarding job responsibilities, performance evaluation standards, examinations, and training opportunities.

Agency Response: *The Agency's intranet (DocuShare) has general information regarding Performance Evaluations. In FY'18, HR will expand the information on the intranet to include job responsibilities in each title used by the agency. HR will continue to email information regarding examinations, training opportunities and job postings on a regular basis to all employees.*

EEPC Response: The EEPC recognizes the agency's commitment to implement corrective action #6. Documentation that demonstrates implementation of corrective action #6 will be required during the compliance-monitoring period.

**Corrective Action #7**

Appoint a principal EEO Professional – who 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 – to implement EEO policies and standards within the agency.

Agency Response: *The Agency will appoint a principal EEO Professional who will be trained and become 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 – to implement EEO policies and standards within the agency.*

EEPC Response: The EEPC recognizes the agency's commitment to implement corrective action #7. Documentation that demonstrates that training was completed by the principal EEO Professional will be required during the compliance-monitoring period.

**Corrective Action #8**

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

Agency Response: *When DCAS publishes the new training schedule for FY'18, the Agency will register the EEO staff so that they are 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; to implement EEO policies and standards within the Agency.*

EEPC Response: The EEPC recognizes the agency's commitment to implement corrective action #8. Documentation that demonstrates that training was completed by the EEO personnel will be required during the compliance-monitoring period.

**Corrective Action #9**

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.

Agency Response: *After EEO professional has received the required training, the Agency will set up a schedule of meetings [between] the EEO professional and the Agency Head (or a direct report other than the General Counsel) to maintain an updated EEO program for all employees. These meetings will be documented as well as any and all other communications between the Agency head and the Principal EEO professional regarding decisions that impact the administration and operation of the EEO program.*

EEPC Response: The EEPC recognizes the agency's commitment to implement corrective action #9. Documentation that demonstrates implementation of corrective action #9 will be required during the compliance-monitoring period.

**Corrective Action #10**

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.

Agency Response: *Henceforth, the Agency will submit to 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.*

EEPC Response: The agency's Annual Plan/Report, and Quarterly Reports of measures to implement the plan, will be reviewed during the compliance-monitoring period.

Thank you and your staff for your continued cooperation.

**EQUAL EMPLOYMENT PRACTICES COMMISSION  
CITY OF NEW YORK**

**RESOLUTION #2017/211-256:** Final Determination pursuant to the Audit: Review, Evaluation and Monitoring of the NYC Police Pension Fund's Employment Practices and Procedures from July 1, 2014 to December 31, 2016.

**Whereas**, pursuant to Chapter 36, Section 831(d)(2) and (5) of the New York City Charter, the Equal Employment Practices Commission is authorized to audit and evaluate the employment practices, programs, policies, and procedures of city agencies and their efforts to ensure fair and effective equal employment opportunity for minority group members and women, and to make recommendations to city agencies to insure equal employment opportunity for minority group members and women; and

**Whereas**, pursuant to Chapter 36, Section 831(d)(2), this Commission has adopted *Uniform Standards for EEPD Audits* 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 women, minorities, and other employees and job applicants identified for protection from discrimination in employment within municipal government; and

**Whereas**, pursuant to its audit of the NYC Police Pension Fund's (PPF) Employment Practices and Procedures, the Equal Employment Practices Commission (EEPC) issued a Preliminary Determination letter, dated May 30, 2017, setting forth findings and the following required corrective actions:

1. Issue an updated EEO policy statement, to include all protected classes.
2. 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.
3. Promote employees' awareness of opportunities for advancement and transfer within the agency by: administering incentive programs; publicizing promotions, including promotions into, or changes in, the managerial ranks; and/or using other methods to communicate internal opportunities.
4. Ensure that employees are considered internally for career enhancement, development opportunities and transfer by: providing and encouraging training, development or mentorship programs to improve their performance and skills; establishing internal talent pools via cross-training, cross divisional assignments, job transfers, and/or job rotation; and identifying internal successors with applicable knowledge/skills/abilities.
5. 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.

6. 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.
7. Ensure that employees have access to information regarding job responsibilities, performance evaluation standards, examinations, and training opportunities.
8. Appoint a principal EEO Professional – who is trained and knowledgeable regarding city, state and 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.
9. Ensure that EEO professionals are trained in EEO laws and procedures and know how to carry out their responsibilities under the EEO Policy.
10. 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.
11. 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.

**Whereas**, the agency submitted its response to the EEPC's Preliminary Determination letter, on June 12, 2017; and

**Whereas**, in accordance with Chapter 36, Section 832(c) of the New York City Charter, the EEPC considered the agency's response and issued a Final Determination on June 20, 2017; and

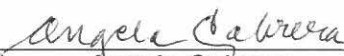
**Whereas**, in accordance with Chapter 36, Section 832 (c) of the City Charter, the EEPC is required to monitor the agency for a period not to exceed six months, from July, 2017 through December, 2017, to determine whether it implemented the required corrective actions; and

**Whereas**, in accordance with Chapter 36, Section 832 (c) of the City Charter, the agency is required to respond in 30 days and make monthly reports thereafter to the Commission on the progress of implementation of such corrective actions; and

Whereas, all of the EEPC's corrective actions are required by, or are consistent with, federal, state and local laws, regulations, policies and procedures which are designed to increase equality of opportunity for women, minorities, and other employees and job applicants identified for protection from discrimination in employment within municipal government; Now Therefore,

Be It Resolved, that the Commission approves issuance of this Final Determination to Executive Director Kevin Holloran of the NYC Police Pension Fund.

Approved unanimously on June 22, 2017.



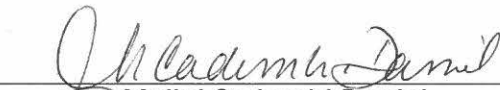
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Angela Cabrera  
Commissioner

Absent

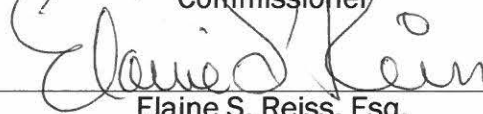
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Arva Rice  
Commissioner



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Malini Cadambi Daniel  
Commissioner



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Elaine S. Reiss, Esq.  
Commissioner



# New York City Police Pension Fund

233 BROADWAY  
NEW YORK, NEW YORK 10279  
(212) 693-5100

Kevin Holloran  
Executive Director

July 20, 2017

Charise Terry, PHR  
Executive Director  
Equal Employment Practices Commission  
253 Broadway, Suite 602  
New York, New York 10007

RE: Audit Resolution #2017/211-256: Final Determination Pursuant to the Review, Evaluation and Monitoring of the NYC Police Pension Fund's Employment Practices and Procedures from July 1, 2014 to December 31, 2016

Dear Executive Director Terry:

Chapter 36, §832(c) of the New York City Charter requires that:

1. The EEPC assign a 6-month compliance period to monitor PPFs' efforts to eliminate remaining required corrective actions; and
2. PPF provide a written response within 30 days from the date of your Final Determination letter indicating corrective action taken.

In accordance with your findings, the following required corrective actions have been/will be implemented:

- **Corrective action required (#1)**: Establish and implement an EEO training program for new and existing employees.
- **Corrective Action #1**: PPF has been in contact with Mr. Raymond Vinueza, on the staff of Deputy Commissioner R. Fenimore Fisher of DCAS Citywide Diversity and Equal Employment Opportunity Division. Not only will PPF have training for all staff, but both EEO Officers will receive a 5 day training given by DCAS.
- **Corrective action required (#2)**: Promote employees awareness of opportunities for advancement through incentive programs; publicized promotions, including promotions into, or changes in, the managerial ranks; and/or using other methods to communicate internal opportunities.
- **Corrective Action #2**: In the interim between the initial report and the final determination report, all non-managerial employees have been part of HR run sessions discussing opportunities for advancement and transfer within the Agency. Also in this time frame, PPF has promoted 5 employees to Principal Administrative Associate off of a promotional certification.
- **Corrective action required (#3)**: The Agency did not demonstrate that it considered incumbent employees for career enhancement, development opportunities, and transfer.
- **Corrective Action #3**: Since this audit, and prior to the receipt of the audit

determination, HR has met with the staff, individually and in groups, to discuss career development in the public sector and the civil service process. With the beginning of the FY'18, DCAS will offer the new schedule of classes and training. The Agency will encourage all employees to attend sessions of interest to them. See attachments: Career Advancement sign in sheet (for all those who have not signed up of been promoted to civil service; and Citywide Training Center applications. HR will seek further guidance from DCAS and EEPC and will update through Team Central.

- **Corrective action required (#4):** The Agency did not demonstrate that, during the period in review, it used an applicant/candidate log or tracking system.
- **Corrective Action #4:** EEPC does not require a supplementary tracking system. What PPF will do in the form of compliance is have the EEO Professional review this process to ensure the avoidance of bias.
- **Corrective action required (#5):** The Agency did not designate a professional with appropriate training, knowledge and familiarity with career opportunities in City government to provide career counseling to employees upon request.
- **Corrective Action #5:** The Agency will designate a professional (Career Counselor) with appropriate training, knowledge and familiarity with career opportunities to employees upon request in FY'18. Further, the "Career Counselor" will remind employees of the identity/type of guidance available at least once each year.
- **Corrective action required (#6):** Ensure that employees have access to information regarding job responsibilities, performance evaluation (PE) standards, examinations, and training opportunities.
- **Corrective Action #6:** The Agency's intranet (DocuShare) has general information regarding Performance Evaluations as part of agency policy and procedures. During the compliance monitoring period, HR will expand the information on the intranet to include job responsibilities in each title used by the agency. HR will continue to email information regarding examinations, training opportunities and job postings on a regular basis to all employees.
- **Corrective action required (#7):** The agency did not demonstrate that the principal EEO professional was trained and knowledgeable regarding city, state and EEO laws; the requirements of the Agency's EEO policies, standards and procedures; and the prevention, investigation, and resolution of discrimination complaints.
- **Corrective Action #7:** The agency is in the process of appointing an EEO professional who was trained in the military and will be in compliance before the end of the compliance monitoring period. The agency will continue to have EEO officers (1 male, 1 female) who will be trained in the same time frame.
- **Corrective action required (#8):** The Agency did not demonstrate that the EEO Counselor was trained in EEO laws and procedures and knew how to carry out their responsibilities under the EEO Policy.

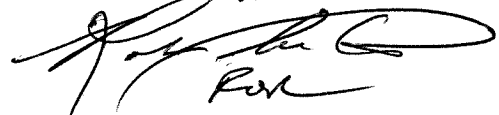


- **Corrective Action #8:** The agency will ensure that EEO professionals are trained in EEO laws and procedures and know how to carry out their responsibilities within the compliance monitoring period.
- **Corrective action required (#9):** During the period in review, no meetings were held between the principal EEO professional and the agency head, and documentation of decisions that impact the administration and operation of the EEO program was not maintained.
- **Corrective Action #9:** After the appointment of the EEO professional, this designee and the EEO officers will set up a schedule of meetings with the the Agency Head (or a direct report other than the General Counsel) to maintain an updated EEO program for all employees. These meetings will be documented as well as any and all other communications between the Agency head and the Principal EEO professional regarding decisions that impact the administration and operation of the EEO program in the compliance monitoring period.
- **Corrective action required (#10):** During the period in review, that agency did not submit to the EEPC Annual Plans of measures and programs to provide equal employment opportunity, or quarterly reports (up to 30 days following each quarter on efforts to implement each plan.
- **Corrective Action #10:** Henceforth, the Agency will submit to 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 during the compliance monitoring period.

After implementation of the EEPC's corrective actions, the Agency Head will distribute 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.

If you have any questions regarding this response, please address them to Ms. Ellen J. Murphy, Director of Human Resources for NYCPPF. You can reach Ms. Murphy by telephone at (212) 693-5125 or by email: [emurphy@nycppf.org](mailto:emurphy@nycppf.org).

Sincerely,



Kevin Holloran

C: J. McLoughlin  
File



# New York City Police Pension Fund

233 Broadway, 25th Floor  
New York, NY 10279  
(212) 693-5100

Kevin Holloran  
Executive Director

## MEMORANDUM

TO: All Staff

FROM: Kevin Holloran, Executive Director

SUBJECT: Equal Employment Practices Commission Audit

DATE: December 13, 2017

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The Equal Employment Practices Commission (EEOC) conducted an Audit: Review, Evaluation and Monitoring of the NYC Police Pension Fund's Employment Practices and Procedures from July 1, 2014 to December 31, 2016. I continue to urge all employees to become familiar with the Equal Employment Opportunity Policy Standards and Procedures. Here are some of the changes have been made to the agency's EEO Program as a result:

EEO training plan for employees – PPF will be conducting “Everyone Matters” EEO training for all of its employees on 12/18 and 12/19, 2017. In an effort to ensure that all current employees that are unable to attend and future hires receive EEO training, going forward, PPF will conduct EEO training on a quarterly basis. In addition, all employees will receive EEO training every 3 years.

Promote Employees Awareness of Opportunities – distributing to all staff DCAS' Monthly Exam Schedule. Ellen Murphy is the NYCPPF designated Career Counselor. In addition, Human Resources will conduct *Career Advancement* and informational training sessions on a semi-annual basis during the months of May and November. Internal job opportunities will be posted on agency bulletin boards.

Employee access to job responsibilities and performance evaluations- All employees will received a copy of their performance evaluation indicating the required Task and Standards prior to each evaluation period and new hires will be provided same upon assignment.

Appoint a Principal EEO Professional- the agency has appointed two EEO Professionals (Crystal Robles and Wen Sang Wang) who are 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 -- to implement EEO policies and standards within the agency.

Annual Plan – The Annual plan has been completed and is on file with the EEO Principal.

As the Executive Director of the PPF, I reaffirm this agency's strong and continuing commitment to maintaining fair employment practices for all members of the organization as well as prospective job applicants. It is essential that the PPF prevents discrimination and encourage a work environment that appreciates differences among our diversified employees.

I encourage all employees to utilize the resources available within the PPF and address any concerns:

<u>NAME:</u>	<u>CONTACT INFORMATION:</u>	<u>TYPE OF GUIDANCE AVAILABLE:</u>
Ms. Ellen Murphy HR Director/Career Counselor	233 Broadway New York, NY 10279 25 <sup>th</sup> Floor 212-693-5125 emurphy@nycppf.org	Career opportunities in City government to provide career counseling to employees upon request
Ms. Crystal Robles, Principal EEO Professional Disabilities Rights Coordinator	233 Broadway New York, NY 10279 19 <sup>th</sup> Floor 212-693-5857 crobles@nycppf.org	Equal employment opportunities Reasonable Accommodations
Mr. Wen Sang Wang EEO Officer	233 Broadway New York, NY 10279 19 <sup>th</sup> Floor 212-693-5617 wwang@nycppf.org	Equal employment opportunities Reasonable Accommodations



Kevin Holloran  
Executive Director

**EQUAL EMPLOYMENT PRACTICES COMMISSION  
CITY OF NEW YORK**

**RESOLUTION #2017/216-256-C33: Determination of Compliance** (Monitoring Period Required) by the Police Pension Fund with the Equal Employment Practices Commission's required corrective actions pursuant to the Review, Evaluation and Monitoring of the Employment Practices and Procedures from July 1, 2014 to December 31, 2016.

**Whereas**, pursuant to Chapter 36, Section 831(d)(2) and (5) of the New York City Charter, the Equal Employment Practices Commission is authorized to audit and evaluate the employment practices, programs, policies, and procedures of city agencies and their efforts to ensure fair and effective equal employment opportunity for minority group members and women, and to make recommendations to city agencies to insure equal employment opportunity for minority group members and women; and

**Whereas**, pursuant to Chapter 36, Section 831(d)(2), this Commission has adopted *Uniform Standards for EEPC Audits* 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 women, minorities, and other employees and job applicants identified for protection from discrimination in employment within municipal government; and

**Whereas**, pursuant to its audit and analysis of the Police Pension Fund's (PPF) Employment Practices and Procedures, the Equal Employment Practices Commission (EEPC) issued a Preliminary Determination letter, dated May 30, 2017, setting forth findings and the following required corrective actions:

1. 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.
2. Promote employees' awareness of opportunities for advancement and transfer within the agency by: administering incentive programs; publicizing promotions, including promotions into, or changes in, the managerial ranks; and/or using other methods to communicate internal opportunities.
3. Ensure that employees are considered internally for career enhancement, development opportunities and transfer by: providing and encouraging training, development or mentorship programs to improve their performance and skills; establishing internal talent pools via cross-training, cross divisional assignments, job transfers, and/or job rotation; and identifying internal successors with applicable knowledge/skills/abilities.
4. 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.

5. 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.
6. Ensure that employees have access to information regarding job responsibilities, performance evaluation standards, examinations, and training opportunities.
7. Appoint a principal EEO Professional – who 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 – to implement EEO policies and standards within the agency.
8. Ensure that EEO professionals are trained in EEO laws and procedures and know how to carry out their responsibilities under the EEO Policy.
9. 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.
10. 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.

**Whereas**, the PPF submitted its response to the EEPC's Preliminary Determination letter on June 12, 2017, and

**Whereas**, in accordance with Chapter 36, Section 832(c) of the New York City Charter, the EEPC considered the agency's response and issued a Final Determination on June 20, 2017 which indicated that corrective action nos. 1 - 10 required compliance monitoring; and

**Whereas**, the PPF submitted its response to the EEPC's final determination letter, on July 25, 2017, and

**Whereas**, in accordance with Chapter 36, Section 832(c) of the New York City Charter, the EEPC monitored the agency's implementation of the corrective actions from September 2017 to December 2017 with no extension of the monitoring period;

**Whereas**, at the EEPC's request pursuant to Section 815.a.(15) of the New York City Charter, the PPF submitted a copy of the agency head's memorandum to staff dated December 13, 2017, which outlined the corrective actions implemented in response to the EEPC's audit and reiterated his commitment to the agency's EEO Program; and

**Whereas**, all of the EEPC's corrective actions are required by, or are consistent with, federal, state and local laws, regulations, policies and procedures which are designed to increase equality of opportunity for women, minorities, and other employees and job applicants identified for protection from discrimination in employment within municipal government; Now Therefore,

**EQUAL EMPLOYMENT PRACTICES COMMISSION  
CITY OF NEW YORK**

**Be It Resolved**, that the PPF has implemented the required corrective actions deemed necessary to ensure compliance with the equal employment opportunity standards of this Commission and requirements of Chapters 35 and 36 of the City Charter.

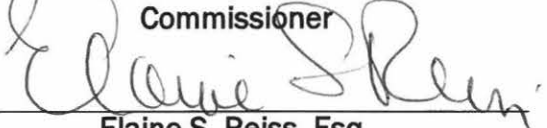
**Be It Resolved**, that the Commission will forward this Determination of Compliance to Executive Director Kevin Holloran of the Police Pension Fund.

Approved unanimously on December 21, 2017.

  
\_\_\_\_\_  
**Angela Cabrera  
Commissioner**

  
\_\_\_\_\_  
**Arva Rice  
Commissioner**

  
\_\_\_\_\_  
**Malini Cadambi Daniel  
Commissioner**

  
\_\_\_\_\_  
**Elaine S. Reiss, Esq.  
Commissioner**



Angela Cabrera  
Malini Cadambi Daniel  
Elaine S. Reiss, Esq.  
Arva R. Rice  
Commissioners

Charise L. Terry, PHR  
Executive Director

Judith Garcia Quiñonez, Esq.  
Executive Agency Counsel

253 Broadway  
Suite 602  
New York, NY 10007

212. 615. 8939 tel.  
212. 615. 8931 fax

**BY MAIL AND EMAIL**

December 21, 2017

Kevin Holloran  
Executive Director  
NYC Police Pension Fund  
233 Broadway, 19th Floor  
New York, NY 10279

Re: Resolution #2017/216- 256-C33: Determination of Agency Compliance

Dear Executive Director Holloran:

On behalf of the members of the Equal Employment Practices Commission (EEPC or Commission), I want to inform you that the Commission has issued the attached Determination of Compliance to the Police Pension Fund. This Commission has determined that the Police Pension Fund has implemented the required corrective actions deemed necessary by this Commission for ensuring a fair and effective affirmative employment program of equal opportunity as required by the equal employment opportunity standards of this Commission and Chapters 35 and 36 of the New York City Charter.

On behalf of this Commission, I want to thank you and Principal EEO Professional Crystal Robles for the cooperation extended to the EEPC during the compliance-monitoring period.

Sincerely,

A handwritten signature in black ink that reads "Elaine S. Reiss". The signature is written in a cursive style with a large, looped initial "E".

Elaine S. Reiss, Esq.  
Commissioner

c: Principal EEO Professional, Crystal Robles, PPF

EEPC

EQUAL EMPLOYMENT PRACTICES COMMISSION

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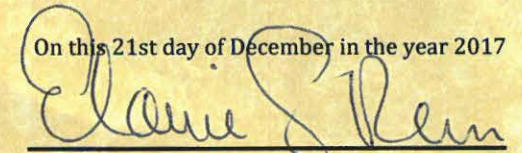
# Determination of Compliance

is issued to the

## Police Pension Fund

for successfully implementing 10 of 10 required corrective actions pursuant to the Equal Employment Practices Commission's Employment Practice and Procedures Audit From July 1, 2014 to this date.

On this 21st day of December in the year 2017



Commissioner



Charise L. Terry, PHR, Executive Director

In care of Executive Director Kevin Holloran and  
Principal EEO Professional Crystal Robles