



EQUAL EMPLOYMENT PRACTICES COMMISSION

City of New York

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April 14, 2011

Nelson Serrano
Executive Director
Teachers' Retirement System
55 Water Street
New York, New York 10041

Re: Resolution #11/03-041: Preliminary Determination Pursuant to the Audit of Compliance by the Teachers' Retirement System (TRS) with its Equal Employment Opportunity Policy from January 1, 2007 through December 31, 2009.

Dear Mr. Serrano:

Pursuant to Chapter 35, Section 814(a)(12) of the New York City Charter, the City established the Citywide Equal Employment Opportunity Policy (EEOP), a set of uniform standards and procedures designed to ensure the equality of opportunity for women and minority municipal government employees and job applicants, and, consistent with federal, state and local laws, identified other groups for protection from discrimination in employment by city agencies.

Pursuant to Chapter 36, Section 831(d)(5) of the New York City Charter, the Equal Employment Practices Commission (EEPC) is empowered 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.

Section 831(d)(2) authorizes this Commission to recommend all necessary and appropriate measures, standards and programs to be utilized by city agencies to ensure a fair and effective affirmative employment program of equal employment opportunity for minority group members and women employed by, or seeking employment with, city agencies.

The Charter defines 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..."

This letter contains the preliminary determinations of the EEPC pursuant to its audit of compliance by the Teachers' Retirement System (TRS), which may herein be referred to as "the agency", during the thirty-six month period commencing January 1, 2007 and ending December 31, 2009. Requests for corrective actions and/or recommendations are included where the EEPC has determined that TRS has failed to comply in whole or in part with its EEO Policy and Federal, State, and City EEO laws.

All recommendations for corrective actions are consistent with both the audit's findings and the parameters set forth in the TRS' EEO Policy, which, in accordance with section 815 of the City Charter, holds agency heads responsible for the effective implementation of Equal Employment Opportunity. In addition, this Commission is empowered by Section 831 of the City Charter to recommend all necessary and appropriate actions to ensure fair and effective affirmative employment plans for minority group members and women.

The purpose of this audit is to evaluate the agency's compliance with its EEO policy, not to issue findings of discrimination pursuant to the New York City Human Rights Law.

Scope and Methodology

Audit methodology included an analysis of the agency's responses to an EEPC Document and Information Request Form. EEPC auditors conducted interviews with the TRS's EEO Officer/HR Director and Agency Counsel via the EEPC's interview questionnaires for EEO professionals. EEPC auditors also conducted an in-depth, on-site interview with the agency's EEO Officer/HR Director. In addition, employees were asked to participate in the *EEPC's Employee Survey* and managers/supervisors were asked to complete the *EEPC's Manager/Supervisor Survey*. A survey of 361 people currently employed by the TRS was distributed; 172 people (45%) responded. Survey findings are attached (Appendix 1). A survey of 89 TRS supervisors/managers was distributed; 63 supervisors/managers (71%) responded. Survey findings are attached (Appendix 5).

Description of the Agency

The Teacher's Retirement System is one of the largest pension systems in the United States. It provides New York City educators with retirement, disability, and death benefit services and administers one of the largest unified Section 403(b) Tax-Deferred Annuity Programs in the country. TRS membership is available to educators who work for the New York City Department of Education, the City University of New York, or participating New York City Charter Schools. Overall, TRS' programs serve more than 183,000 in-service members, retirees, and beneficiaries.

Personnel Activity During the Audit Period

According to data provided by the TRS, during the audit period 40 people were hired: 11 Caucasians, 15 African-Americans, 3 Hispanics, 5 Asians, and 6 Unknown. Of the individuals

hired, 15 were female. 58 individuals were promoted during the audit period: 25 Caucasians, 12 African Americans, 6 Hispanics, and 15 Asians; 35 were female. (Appendix 4)

The TRS reports that 53 employees were involuntarily separated during the audit period: 22 African Americans, 19 Caucasians, 9 Asians, and 3 Hispanics; 26 were female. Between January 1, 2007 and December 31, 2009, the total number of employees decreased from 375 to 367. The number of Asian employees decreased from 67 to 64, Caucasians decreased from 147 to 142, Hispanics stayed the same at 42, African Americans stayed the same at 118, and the number of employees that were unknown stayed the same at 1. The number of female employees decreased from 205 to 197. (Appendices 2 and 3)

Discrimination Complaint Activity During the Audit Period

The TRS reports that no internal or external discrimination complaints were filed during the audit period.

Legal Activity

According to the agency, there were no EEO judgments or settlements during the audit period or the two years prior.

PRELIMINARY DETERMINATION

Following are our preliminary determinations with required corrective actions and recommendations pursuant to the audit.

EEO Policy

The TRS is in compliance with the following requirements:

1. The agency distributed its Associate Handbook to all employees during new hire orientation. The handbook included an EEO statement identifying the HR Director as the person responsible for the implementation of all policies and procedures connected with TRS's EEO Policy. The handbook also included a Sexual Harassment/Discriminatory Intimidation statement and complaint procedure. In addition, 79% of the respondents to the *EEPC's Supervisor/Manager Survey* indicated they received a copy of the agency's EEO Policy Statement and 60% indicated the agency's Discrimination Complaint procedure was included with the EEO policy.
2. The Associate Handbook is posted and accessible to all employees on the agency's intranet. In addition, 72% of the respondents to the *EEPC's Employee Survey* said that the EEO Policy is posted on the agency's bulletin boards or kept in an area otherwise accessible to employees. In addition, 59% of the respondents to the *EEPC's Supervisor/Manager Survey* indicated the policy is most accessible in the HR Office and 46% indicated the policy is most accessible on the intranet.

3. The agency also issued its HR Policy Manual to all managers and supervisors. The policy included sections on recruiting and employment, selection criteria, interviewing guidelines, termination guidelines, job posting practices, performance planning and evaluation, Affirmative Action responsibilities, and disability procedures.

The TRS is not in compliance with the following requirements:

1. The agency's handbook does not include information on external agencies that handle complaints. Corrective action is required.

Recommendation: To afford employees the opportunity to exercise their right to file an external complaint with a federal, state or local administrative agency, the Policy/Discrimination Complaint Procedure should be revised to include the current addresses and phone numbers of the New York City Commission on Human Rights, the New York State Division of Human Rights and the U.S. Equal Employment Opportunity Commission. (Sect. 831 d (2), City Charter)

2. The agency's handbook does not include all the protected classes such as partnership status, predisposing genetic characteristic, creed, military status, prior arrest and or conviction, and victim of domestic violence or stalking. Corrective action is required.

Recommendation: Since each agency head must ensure that his/her agency does not discriminate against employees or applicants for employment in any manner prohibited by federal, state, and local law, the agency's EEO Policy should be revised to include all of the protected classes under New York City and New York State Human Rights Laws. The *revised* EEO Policy should be distributed to all current and new employees and posted in hardcopy or electronically. (Sect. 831(d)(2), City Charter)

EEO Training Standards

The TRS is not in compliance with the following requirements:

The agency has not developed a plan to ensure that all employees receive EEO and Sexual Harassment training. In addition, 91% of the respondents to the *EEPC's Employee Survey* indicated they did not receive EEO training within the past 2 years. In addition, 59% of the respondents to the *EEPC's Supervisor/Manager Survey* indicated they think the agency did not provide sufficient training on their responsibilities in assisting employees who may complain about discrimination or harassment. Corrective action is required.

Recommendation: The agency should develop an EEO training plan to ensure that all individuals who work within the agency, including managers and supervisors, are trained concerning EEO-related policies, rights, and responsibilities. (Sect. 831(d)(2), City Charter)

Discrimination Complaint and Investigation Procedures

The TRS is in compliance with the following requirements:

1. The agency appointed an EEO Officer to receive and investigate discrimination complaints in conformance with Federal, City, and State laws pursuant to discrimination in employment.
2. The agency's EEO Officer completed the basic training course for EEO professionals conducted by the Department of Citywide Administrative Services (DCAS).

Selection and Recruitment System

The TRS is in compliance with the following requirement:

The agency conducted annual performance evaluations during the audit period. In addition, 56% of the respondents to the EEPC's *Supervisor/Manager Questionnaire* indicated that they received their last performance evaluation within the past year and 44% received their last evaluation over a year ago. In addition, 78% of the respondents to the EEPC's *Employee Survey Questionnaire* indicated that they received annual performance evaluation within the past 3 years.

The TRS is not in compliance with the following requirements:

None of the job vacancy notice or job advertisements posted during the audit period indicated that the TRS is an Equal Opportunity Employer. Corrective action is required.

Recommendation: All agency recruitment literature should indicate that the agency is an equal opportunity employer. (Sect. 831(d)(2), City Charter)

EEO Professionals

The TRS is in compliance with the following requirement:

The EEO Officer reports to the agency head and meets with him on EEO matters.

The TRS is not in compliance with the following requirements:

1. The agency did not officially appoint EEO representatives of both genders to receive and investigate discrimination complaints. During the audit exit meeting, EEO Officer Carmela Crivelli stated that the Deputy Director of HR was designated to investigate EEO complaints; however, he has not received EEO training and employees were not notified of the appointment. Corrective action is required.

Recommendation: The agency should appoint at least one EEO professional of each gender to receive and investigate discrimination complaints. Each EEO Counselor/representative should be trained and authorized to investigate internal discrimination complaints. (Sect. 831(d)(2), City Charter)

2. Although the agency notified employees of the person responsible for handling EEO complaints, 62% of the respondents to the *EEPC's Employee Survey* stated that they did not know who the agency's EEO Officer is. Corrective action is required.

Recommendation: Since the EEO Officer is responsible for investigation discrimination complaints within the agency and providing guidance and assistance to agency managers, supervisors, and human resource professionals in addressing issues relating to equal employment opportunity, employees should be aware of the identity, location, and telephone number of the EEO Officer. The agency should re-distribute this information. (Sect. 831(d)(2), City Charter)

3. Although the EEO Officer reports to the agency head on EEO matters, the agency's organizational chart does not indicate this reporting relationship. The EEO Officer title is not indicated on the chart. Corrective action is required.

Recommendation: The agency should update its organization chart to reflect the reporting relationship of the EEO Officer and agency head. (Sect. 831(d)(2), City Charter)

4. The EEO Officer did not keep notes or an agenda of meetings with the agency head when discussing EEO operational decisions. Corrective action required.

Recommendation: Because the EEO Officer reports directly to the agency head, it is the Commission's position that appropriate documentation of meetings and other communications between the EEO Officer and the agency head regarding decisions that impact the administration of the agency's EEO program be maintained. (Sect. 831(d)(2), City Charter)

EEO for Persons with Disabilities

The TRS is in compliance with the following requirements:

1. The agency participated in the Section 55-A program. The 55-A program brochure was provided during orientation with the New Hire package. There are currently two program participants.
2. The TRS's response to the EEPC's accessibility for persons with disabilities checklist indicated that its offices at 55 Water Street are accessible to, and useable by persons with disabilities. There is a street accessible entrance, wheelchair accessible elevators, Braille and a bell in the elevators, wide restroom stalls and grab bars in the bathrooms.

The TRS is not in compliance with the following requirements:

1. The agency's EEO policy is not available in alternate formats for person with disabilities. Corrective action is required.

Recommendation: The agency head should ensure that the EEO Officer make a copy of the EEO policies and procedures available in the appropriate alternative format (i.e., large print, audio tape and/or Braille) upon request by an employee or applicant.

2. The EEO Officer was designated as the person responsible for handling reasonable accommodations requests; however, 60% of the respondents to the *EEPC's Employee Survey*

stated that they do not know who the agency's Disabilities Rights Coordinator is. Corrective action required.

Recommendation: To ensure that all employees are aware of the person responsible for handling reasonable accommodation requests and ensuring compliance with all federal, state, and local laws, as well as City and agency policies, pertaining to persons with disabilities, the agency should notify all employees in writing of the name, location, and telephone number of this person.

SUMMARY OF RECOMMENDED CORRECTIVE ACTIONS

1. To afford employees the opportunity to exercise their right to file an external complaint with a federal, state or local administrative agency, the Policy/Discrimination Complaint Procedure should be revised to include the current addresses and phone numbers of the New York City Commission on Human Rights, the New York State Division of Human Rights and the U.S. Equal Employment Opportunity Commission. (Sect. 831(d)(2), City Charter)
2. Since each agency head must ensure that his/her agency does not discriminate against employees or applicants for employment in any manner prohibited by federal, state, and local law, the agency's EEO Policy should be revised to include all of the protected classes under New York City and New York State Human Rights Laws. The *revised* EEO Policy should be distributed to all current and new employees and posted in hardcopy or electronically. (Sect. 831(d)(2), City Charter)
3. The agency should develop an EEO training plan to ensure that all individuals who work within the agency, including managers and supervisors, are trained concerning EEO-related policies, rights, and responsibilities. (Sect. 831(d)(2), City Charter)
4. All agency recruitment literature should indicate that the agency is an equal opportunity employer. (Sect. 831(d)(2), City Charter)
5. The agency should appoint at least one EEO professional of each gender to receive and investigate discrimination complaints. Each EEO Counselor/representative should be trained and authorized to investigate internal discrimination complaints. (Sect. 831(d)(2), City Charter)
6. Since the EEO Officer is responsible for investigation discrimination complaints within the agency and providing guidance and assistance to agency managers, supervisors, and human resource professionals in addressing issues relating to equal employment opportunity, employees should be aware of the identity, location, and telephone number of the EEO Officer. The agency should re-distribute this information. (Sect. 831(d)(2), City Charter)
7. The agency should update its organization chart to reflect the reporting relationship of the EEO Officer and agency head. (Sect. 831(d)(2), City Charter)

8. Because the EEO Officer reports directly to the agency head, it is the Commission's position that appropriate documentation of meetings and other communications between the EEO Officer and the agency head regarding decisions that impact the administration of the agency's EEO program be maintained. (Sect. 831(d)(2), City Charter)
9. The agency head should ensure that the EEO Officer make a copy of the EEO policies and procedures available in the appropriate alternative format (i.e., large print, audio tape and/or Braille) upon request by an employee or applicant.
10. To ensure that all employees are aware of the person responsible for handling reasonable accommodation requests and ensuring compliance with all federal, state, and local laws, as well as City and agency policies, pertaining to persons with disabilities, the agency should notify all employees in writing of the name, location, and telephone number of this person.

In addition to the above recommendations, during the compliance process, the Commission requires that the agency head distribute a memorandum to all staff informing them of the changes that are being implemented in the agency's EEO program pursuant to the audit. This memorandum should re-emphasize the agency head's commitment to the agency's Equal Employment Opportunity Program.

Conclusion

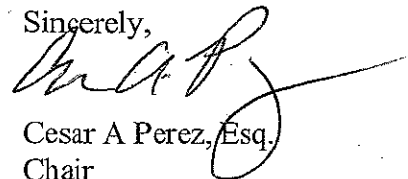
Pursuant to Chapter 36 of the New York City Charter and the previously cited preliminary determinations relating to EEPC's audit of the TRS's compliance with its Equal Employment Opportunity Policy, and EEO standards expressed in Federal, State, and City EEO laws, we respectfully request your response to the aforementioned preliminary determinations.

Your response should indicate what corrective actions your office will take to bring the agency in compliance with the aforementioned policies and which recommendations it intends to follow. Please forward your response within thirty days of receipt of this letter.

Pursuant to Section 832 of the New York City Charter, as amended in 1999, if you do not implement all of these recommendations for corrective actions during a compliance period not to exceed six months, this Commission may publish a report and recommend to the Mayor the appropriate corrective actions that you should implement in your agency's EEO Plan.

In closing, we want to thank you and your staff for the cooperation extended to the Equal Employment Practices Commission's auditors during the course of this audit. If you have any questions regarding these preliminary determinations, please let us know.

Sincerely,



Cesar A Perez, Esq.
Chair

APPENDIX - 1

Teachers' Retirement Services
EMPLOYEE SURVEY RESULTS

Employees = 367 Survey Respondents = 172 47%

A. GENERAL OVERVIEW

1. Equal Employment Opportunity (EEO) guarantees the right of all persons to be accorded full and equal consideration on the basis of merit, regardless of protected group status. Do you agree with this principle?
Yes (161) No (10)
2. Do you know who your agency's EEO Officer is?
Yes (65) No (106)
3. Is the City's EEO Policy posted on your agency's bulletin boards or kept in an area otherwise accessible to employees?
Yes (123) No (39)
4. Were you given a copy of the EEO Policy Handbook - About EEO: What You Need to Know?
Yes (81) No (84)
5. Do you believe your agency practices equal opportunity (i.e. ensures fairness in all aspects of employment including hiring, selection, promotions, etc.)?
Yes (113) No (57)
6. Has your manager or supervisor discussed the agency's commitment to the principle of Equal Employment Opportunity during staff meetings at least twice within the past year?
Yes (31) No (99) Do not remember (38)
7. Has your manager or supervisor discussed employees' right to file a discrimination complaint with the agency's EEO Officer during staff meetings at least twice within the past year?
Yes (24) No (114) Do not remember (33)
8. When hired, were you advised of the EEO policies, and of your rights and responsibilities under such policies?
Yes (56) No (45) Do not remember (71)

B. EEO COMPLAINTS

9. Do you know how to file an EEO complaint?
Yes (52) No (120)
10. If you had an EEO complaint, would you bring it to your agency's EEO Office?
Yes (88) No (30) Undecided (54)
11. Would you prefer to file an EEO complaint with an office outside your agency rather than your agency's EEO Office?
Yes (64) No (44) Undecided (63)
12. During the past 3 years, did you file a complaint with your agency's EEO Office?
Yes (0) No (170)
13. Was your manager or supervisor supportive of your right to file a complaint?
Yes (1) No (10) Not Applicable (159)

C. EEO TRAINING

14. During the past 2 years, did you receive EEO training?
Yes (14) No (157)
15. How informative was this training?
Very informative (10) Somewhat informative (10)
Not really informative (2) Not Applicable (146)

SURVEY RESULTS CONTINUED

D. JOB PERFORMANCE/ADVANCEMENT

16. Does your agency use training and development programs in order to improve job performance and/or career opportunities?
Yes (125) No (22) I do not know (24)
17. Were vacant positions advertised on bulletin boards or other areas accessible to employees in a timely manner?
Yes (134) No (24) Do not remember (13)
18. The Personnel Rules and Regulations of the City of New York and the Guidelines for Evaluating Managerial Performance in NYC Agencies require that all employees (managerial and non-managerial) receive at least one performance evaluation a year. Have you received annual performance evaluations within the past 3 years?
Yes (134) No (26) Employed for less than 12 mos (12)
19. Did your evaluation contain recommendations for improving your job performance?
Yes (95) No (38) Not Applicable (38)
20. Did your evaluation contain recommendations for career advancement with your agency?
Yes (33) No (96) Not Applicable (42)
21. Do you know the name of the person in your agency that is responsible for providing career counseling?
Yes (53) No (117)

E. SPECIFIC PROTECTIONS

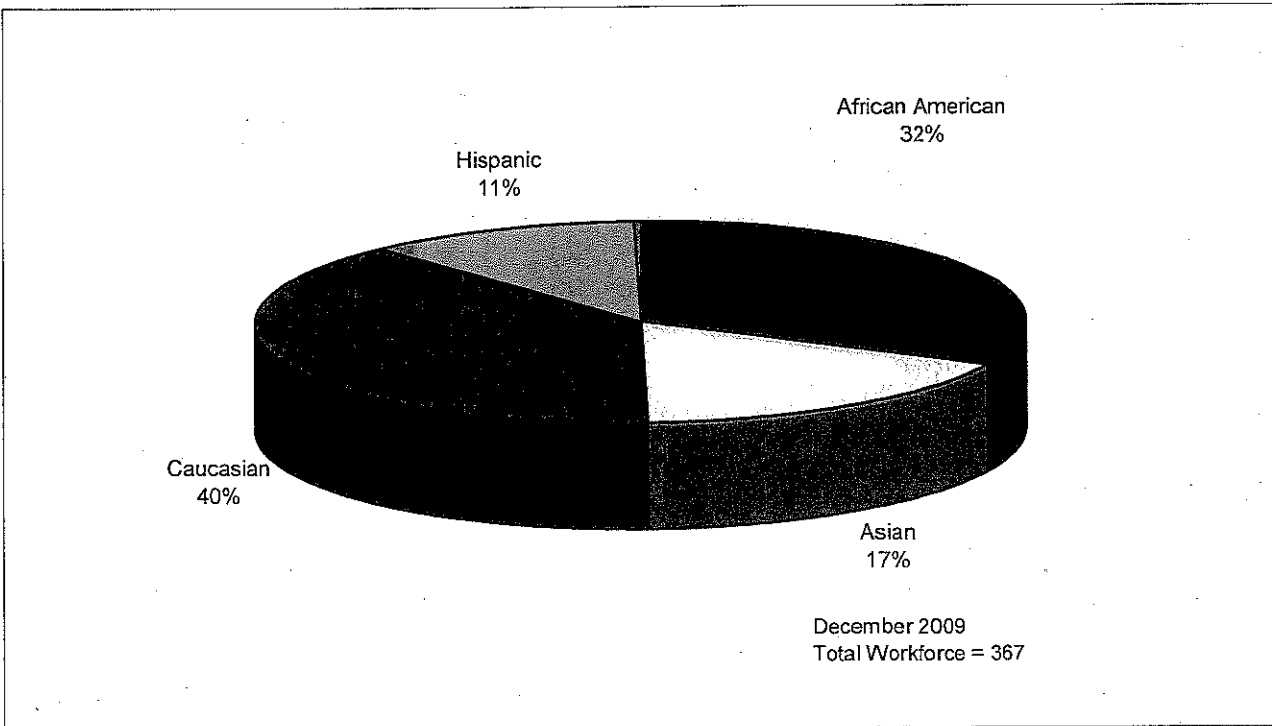
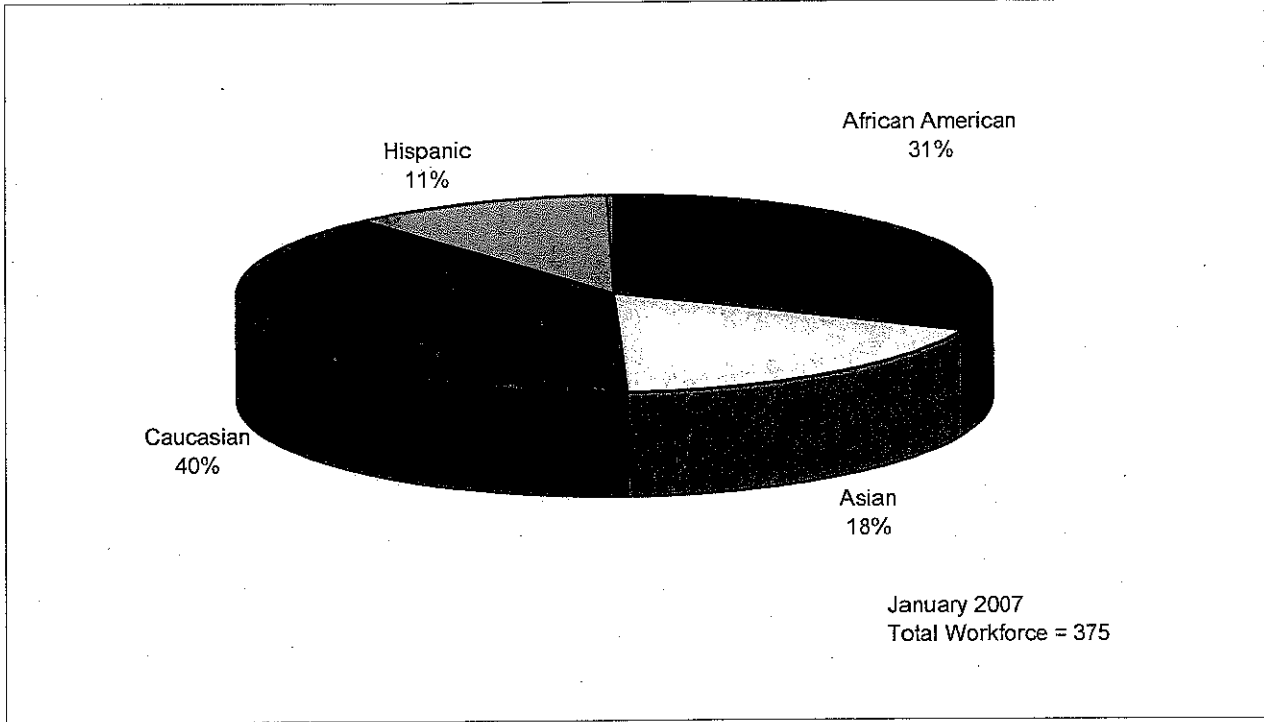
22. Do you know who your agency's Disability Rights Coordinator is?
Yes (33) No (138)
23. Agencies are required to take appropriate action to reasonably accommodate qualified employees and applicants with disabilities, and those who are victims of domestic violence, sex offenses, or stalking, to enable them to perform their jobs or enjoy equal benefits and privileges of employment. Agencies are also required to provide reasonable accommodations for the religious observances, beliefs and practices of an employee or applicant. During the past 3 years, did you ask for a reasonable accommodation due to any of the above?
Yes (17) No (154)
24. Was your accommodation granted?
Yes (14) No (2)

OPTIONAL INFORMATION

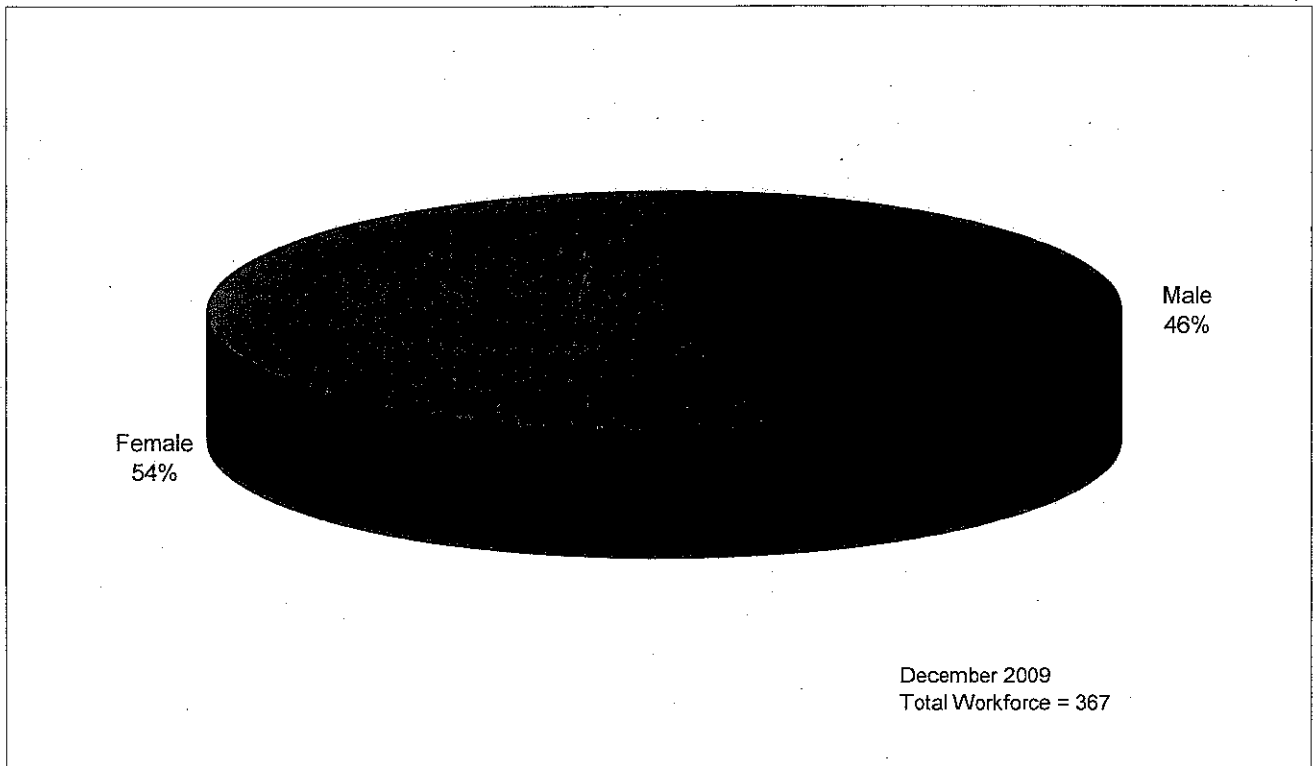
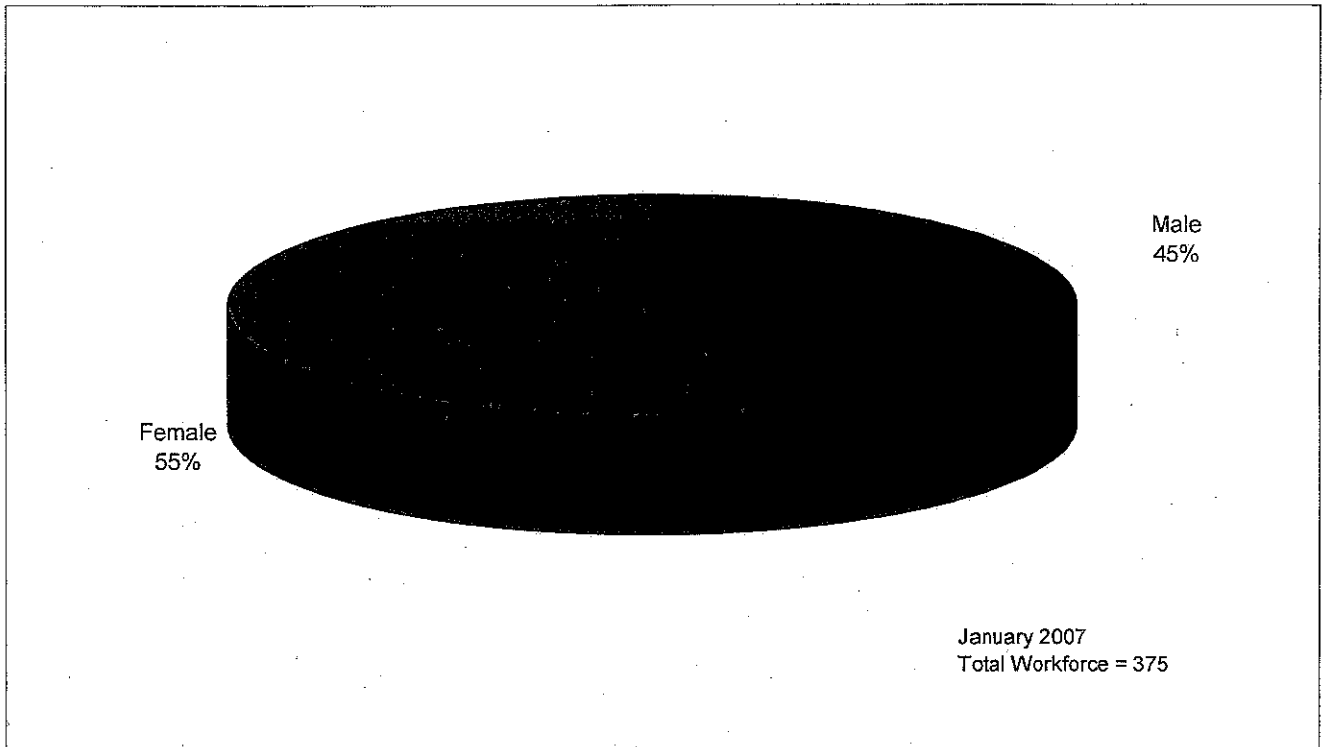
25. Race/Ethnicity
- | | |
|--------------------------------------|-------------------------------------|
| Asian or Pacific Islander (0) | Hispanic (20) |
| American Indian or Alaska Native (0) | White (not of Hispanic origin) (60) |
| Black (not of Hispanic origin) (36) | Other (8) |
26. Gender
- | | |
|-----------|-------------|
| Male (66) | Female (79) |
|-----------|-------------|

Appendix - 3

Teachers' Retirement System
Workforce by Ethnicity



Appendix - 2
Teachers' Retirement System
Workforce by Sex



APPENDIX – 4

The following table indicates personnel activity during the audit period, January 1, 2007 to December 31, 2009.

Teachers' Retirement System

Hires by Sex and Ethnicity

Total Hires: 40

Male	Female	Total	Caucasian	African American	Hispanic	Asian	Native American	Unknown	Total
25	15	40	11	15	3	5	0	6	40

Promotions by Sex and Ethnicity

Total Promotions: 58

Male	Female	Total	Caucasian	African American	Hispanic	Asian	Native American	Unknown	Total
23	35	58	25	12	6	15	0	0	58

Separations by Sex and Ethnicity

Total Separations: 53

Male	Female	Total	Caucasian	African American	Hispanic	Asian	Native American	Unknown	Total
27	26	53	19	22	3	9	0	0	53

Source: Audit data supplied by TRS

Teachers' Retirement System

SUPERVISOR/MANAGER QUESTIONNAIRE RESULTS

Total Supervisors = 89 Completed Questionnaire = 63 (71%)

1. Which of the following are you?
Supervisor (2) Manager (61)
2. How many employees are under your supervision?
Less than 5 (28) 11 - 20 (8)
6 - 10 (17) 21 or more (10)
3. How long have you worked for this agency?
3yrs or less (0) Over 3 yrs (63)
4. Each agency head may distribute a statement in support of Equal Employment Opportunity to all employees. Have you received a copy of your agency's EEO Policy Statement?
Yes (50) No (13) Do not remember (0)
5. In your agency, where can the City's EEO Policy be found?
In the EEO Office (1) In my office (9)
In the HR/Personnel Office (37) I do not know (7)
On the Intranet (29)
6. Of the choices indicated, which is most easily accessible to you?
The EEO Office (0) Your Office (4)
The HR/Personnel Office (14) Not applicable (1)
The Intranet (44)
7. Is the Discrimination Complaint Procedure included with the EEO Policy?
Yes (38) No (3) Do not know (21)
8. Do you know the name of your agency's EEO Officer?
Yes (52) No (2) Do not know (8)
9. Did the EEO Officer meet with you to discuss your EEO rights as an employee?
Yes (32) No (30)
10. Did the EEO Officer meet with you to discuss your EEO responsibilities as a supervisor or manager?
Yes (39) No (22)
11. Did you complete the Department of Citywide Administrative Services' (DCAS) Division of Citywide EEO Computer based Training?
Yes (1) No (48)
12. In your role as a supervisor/manager, have you discussed the agency's commitment to the principle of Equal Employment Opportunity during staff meetings at least twice within the past year?
Yes (19) No (43)
13. In your role as a supervisor/manager, have you discussed with employees their right to file a discrimination complaint with the agency's EEO Officer during staff meetings at least twice within the past year?
Yes (16) No (46)
14. Did you receive sexual harassment prevention training from your agency?
Yes (17) No (46)
15. Please indicate when the training was done.
Within the past 2 years (8) over 2 years ago (9)
16. Did all of the employees that you supervise receive sexual harassment prevention training?
Yes (5) No (32) Do not know (26)

TRS SUPERVISOR/MANAGER QUESTIONNAIRE CONTINUED

17. When you were hired, did you receive an orientation session that included a review of the City's EEO Policy?

Yes (26) No (15) Do not remember (22)

18. Do you participate in orientation sessions for new employees?

Yes (14) No (49)

19. Do new employee orientation sessions include information on the City's EEO Policy?

Yes (26) No (4) Do not know (33)

20. Do you interview candidates for positions in your agency?

Yes (46) No (17)

21. If you are involved in interviewing job applicants, did your agency provide you with training and/or a guide that outlines illegal or discriminatory questions and includes instructions for conducting a structured interview?

Training (6) Both training and guide (9)
Guide (17) I do not interview applicants (16)

22. When was your last performance evaluation?

Within the past year (35) Over a year ago (28)

23. Were you informed that fulfillment of your EEO responsibilities will be part of your overall performance evaluation and will be considered in determining your eligibility for promotions and merit increases?

Yes (7) No (43) Not applicable (13)

24. Does your performance evaluation include an EEO component? (A section that rates your ability to make employment decisions based on merit and equal consideration, or treat others in an equitable and impartial manner.)

Yes (17) No (45) I do not receive performance evaluations (0)

25. Do you conduct formal evaluations of the employees under your supervision annually?

Yes (55) No (7)

26. Do you believe the agency has provided sufficient training to supervisors/managers on their responsibilities in assisting employees who may complain about discrimination or harassment?

Yes (26) No (37)

OPTIONAL INFORMATION

27. Race/Ethnicity

Asian or Pacific Islander (8)	Hispanic (4)
American Indian or Alaskan Native (0)	White (24)
Black (9)	Other (5)

28. Gender

Male (25) Female (25)