

DEPARTMENT FOR THE AGING

- Letter of Implementation July 16, 2009
- Summary Compliance Report July 16, 2009



EQUAL EMPLOYMENT PRACTICES COMMISSION

City of New York

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July 16, 2009

Lilliam Barrios-Paoli, Commissioner
Department for the Aging
2 Lafayette St.
New York, NY 10007

Re: Resolution #09/08-125C: Implementation of Corrective Actions Pursuant to the Audit of Compliance by the Department for the Aging's (DFTA) Equal Employment Opportunity Program (EEOP) from July 1, 2005 to June 30, 2007.

Dear Commissioner Barrios-Paoli:

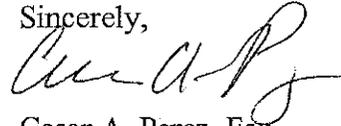
Pursuant to Section 832 of Chapter 36 of the New York City Charter, the Equal Employment Practices Commission (EEPC) was required to monitor audit compliance by the Department for the Aging (DFTA) for a period not to exceed six months. The compliance period was December 2008 through May 2009. The DFTA's Final Compliance Report was submitted on June 10, 2009.

The goal of monitoring was to determine if the DFTA implemented all recommended corrective actions pursuant to our audit of compliance by your agency with the City's Equal Employment Opportunity Policy from July 1, 2005 to June 30, 2007.

After completing its review of the Compliance Reports submitted by your agency, EEPC staff submitted a Compliance Summary Report for Commission review. This Commission has determined that the DFTA has implemented the recommended corrective actions as required by Chapters 35 and 36 of the New York City Charter to the Commission's satisfaction. The Department for the Aging is now in compliance with the requirements of the City's Equal Employment Opportunity Policy.

On behalf of this Commission, I want to thank you and EEO Officer Maria Serrano for the cooperation extended to the EEPC Compliance Unit during the compliance-monitoring period.

Sincerely,

A handwritten signature in black ink, appearing to read "Cesar A. Perez". The signature is fluid and cursive, with a large initial "C" and "P".

Cesar A. Perez, Esq.
Chair

C: Maria Serrano, EEO Officer



EQUAL EMPLOYMENT PRACTICES COMMISSION

SUMMARY COMPLIANCE REPORT

Agency: Department for the Aging

Agency Head: Lilliam Barrios-Paoli, Commissioner

EEO Officer: Maria Serrano

Audit Period: July 1, 2005 – June 30, 2007

Agency Census as of June 30, 2007: 1,333

Preliminary Determination Letter:

July 31, 2008

Agency Response Letter:

August 28, 2008

Compliance Initiation Letter (FDL not necessary):

September 8, 2008

Compliance Initiated:

November 2008

Compliance Completed:

June 2009

Covering Months:

December 2008 – May 2009

Date: July 16, 2009

Pursuant to the findings and recommendations of the Equal Employment Practices Commission's (EEPC) Audit of Compliance by the Department for the Aging (DFTA) with the City's Equal Employment Opportunity Policy from July 1, 2005 through June 30, 2007, the EEPC initiated Audit Compliance with the DFTA in November 2008. The DFTA's final Monthly Compliance Report was submitted on June 10, 2009.

All four required actions were completed and accepted. The following is a summary of the compliance reports:

1. Since the DFTA's workforce continues to show underutilization of one protected class in a job category, it should further expand its recruitment efforts to address underutilization by acquiring "Making the Most of New York City's Recruitment Resources"2004 http://extranet.dcas.nycnet/eo/pdf/apomasterclass_recruitment.pdf a list of recruitment sources compiled by DCAS. This publication provides agencies with additional recruitment resources to address the underutilization of protected groups. (Sect. IV, EEOP)

The DFTA has expanded recruitment efforts to address underutilization by using added recruitment resource guides, web sites, lists of resources and publications, including the

Making the Most of New York City's Recruitment Resources. A copy of the list of resources was provided with the agency's first report.

This action was completed in December 2008.

2. **Since the EEOP requires that city agencies 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, the DFTA should conduct adverse impact studies. (Sect. IV, EEOP)**

The DFTA conducted adverse impact studies. Copies of the studies were provided in the agency's final report.

This action was completed in June 2009.

3. **The agency head should direct the HR director to include the EEO officer in the development of recruitment strategies and selection of recruitment media.**

The DFTA agency head directed the HR department to include the EEO officer in the development of recruitment strategies and selection of recruitment media. A copy of the memo was provided in the agency's first report.

This action was accepted in January 2009.

4. **The DFTA's Commissioner should disseminate an agency-wide memorandum to discuss the changes that are being implemented in the agency's EEO program pursuant to the audit and should re-emphasize his commitment to the agency's EEO program.**

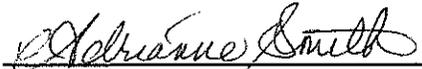
The agency head distributed an agency-wide memo dated June 10, 2009 informing staff about the changes that are being implemented in the DFTA's EEO program and reemphasizing her commitment to the agency's EEO program. A copy of the memo was provided in the final report, and is attached to this Summary.

This action was completed in June 2009.

Recommendation

Based on the above information, we recommend that the Equal Employment Practices Commission issue a Letter of Completion of Compliance to Commissioner Lilliam Barrios-Paoli, informing her that the Department for the Aging has implemented all of the recommended corrective actions to the Commission's satisfaction.

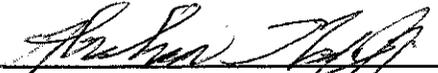
Respectfully Submitted,



Adrienne Smith
EEO Auditor/Compliance Officer



Judith Garcia Quiñonez, Esq.
Counsel/Compliance Director



Abraham May, Jr.
Executive Director

Attachment



Department for
the Aging

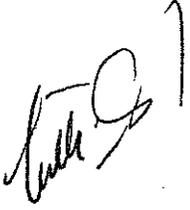
Lilliam Barrios-Paoli
Commissioner

2 Lafayette St.
New York, NY 10007

212 442 1100 tel
212 442 1095 fax

Memorandum

TO: All Staff

FROM: Lilliam Barrios-Paoli, Commissioner 

DATE: June 10, 2009

SUBJECT: Agency Implementation of Changes as per Employment Practices Commission Audit Preliminary Determination of July 31, 2008.

The Equal Employment Practices Commission (EEPC) completed an audit of the Department for the Aging compliance with the City's Equal Employment Opportunity Program. The audit specifically addressed the 24 month period from: July 1, 2005 through June 30, 2007. The auditors also looked at our current practices and conducted a mail-in survey of our staff ascertaining how effectively the agency is addressing Equal Employment Opportunity (EEO) issues. The EEPC had four recommendations and I am pleased to report that all have been implemented:

Below, please find the recommendations and the Agency's corrective actions:

1 - Conduct Adverse Impact Study at the Agency:

DFTA petitioned the Department of Citywide Administration Services (DCAS) Office of Citywide Equal Employment Opportunity (OCEEO) to obtain the technical assistance necessary to conduct the adverse impact study at DFTA. The study has been conducted effectively. Overall, results indicate that DFTA is moving in the right direction to continue to strengthen recruitment of protected groups. The Office of the EEO will work closely with the HR Unit to ensure the selection process is properly coordinated. Adverse Impact Studies will be conducted, on a yearly basis.

2-Underutilization:

DFTA has expanded recruitment efforts to address underutilization by using added recruitment resource guides, Web sites, list of recruitment resources and publications to address the underutilization of protected groups. Recruitment will also be expanded to sources employment service programs or organizations that can assist with recruitment of protected groups.

3- Agency Recruitment and Selection of Personnel:

An Agency Memo directing the Director of HR to include DFTA's EEO Officer in the development of recruitment strategies and selection of recruitment media was issued in August 2008.

4- Agency head memorandum to all staff indicating changes implemented in the EEO Program as a result of the audit.



**Department for
the Aging**

As Commissioner, I affirm this agency's strong commitment to maintain fair employment practices for all of its employees and job applicants. DFTA is committed to preventing discrimination by ensuring that all employees are aware of their rights and obligations under this policy and encouraging a work environment that is free of discrimination and their diversity and cultural backgrounds are appreciated.

It is important for all personnel to work together, to maintain focus on the goals of the agency and continue to build an atmosphere of appreciation for diversity as it is reflected on our staff.

I encourage all employees to access the resources available within DFTA and to contact Maria Serrano, DFTA's EEO Officer. Ms. Serrano's office is located at DFTA's Senior Employment Unit, 220 Church Street, Rm. 323, NY, NY 10013 and she can be reached at 212-442-1369 or by email mserrano@aging.nyc.gov.