#07/09-NYCHA/C NEW YORK CITY HOUSING AUTHORITY

- Summary Compliance Report July 12, 2007
- Letter of Compliance Satisfaction July 12, 2007

EQUAL EMPLOYMENT PRACTICES COMMISSION
SUMMARY COMPLIANCE REPORT

Agency: New York City Housing Authority

Agency Head: Tino Hernandez, Chairman

EEO Officer: Fredrika Wilson

Audit Period: July 1, 2003 - June 30, 2005

Date of Preliminary Determination Letter:	*August 3, 2006*
Date of Response Letter:	*September 28, 2006*
Date of Final Determinations Letter:	*December 6, 2006*
Date of Response Letter to the Commission's Final Determinations Letter:	*March 2, 2007*
Compliance Initiated:	*March 2007*
Compliance Completed:	*June 2007*
Covering Months:	*April 2007 - June 2007*

Date: July 12, 2007

Pursuant to the findings and recommendations of the Equal Employment Practices Commission's (EEPC) Audit of Compliance by the New York City Housing Authority (NYCHA) with the City's Equal Employment Opportunity Policy (EEOP), EEPC initiated Audit Compliance with the NYCHA in March 2007. The NYCHA's final Monthly Compliance Report was submitted on June 28, 2007.

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

1. **The NYCHA should follow section V(C) (4) of the Citywide EEO Policy and ensure that its EEO policies are available in formats accessible to applicants and employees with disabilities. Specifically, the NYCHA should ensure that its EEO policy is equally accessible to persons with visual impairments (e.g., large print, audio cassette or Braille).**

The NYCHA's EEO policies were placed in audio format via telephone voice mail. NYCHA employees are able to telephone 212-306-4600 and listen to the NYCHA non-discrimination policies. This audio format is accessible to all employees including employees with visual impairments.

The required action was completed in May 2007.

2. **The Associate Investigator who has not completed EEO training should complete such training by either attending standard training for EEO professionals conducted by the Department of Citywide Administrative Services or completing the EEO certificate program at Cornell University's School of Industrial and Labor Relations.**

The NYCHA reported that Associate Investigator Shelly-Ann Wilkinson has successfully completed DCAS Basic Training for EEO Professional on June 14, 2007. A copy of the Certificate of Completion was submitted on June 28, 2007

The required action was completed in June 2007.

3. **The Director of the DEO should memorialize meetings with the Chairman where discrimination complaints are discussed and resolutions of those complaints are decided. These notes should indicate that the Chairman has reviewed, and approved or disapproved, of the recommendations.**

The NYCHA said that its Chairman is briefed on EEO Investigations at their commencement, and the Department of Equal Opportunity (DEO) maintains a notation of any response or recommendation by the Chairman regarding DEO's investigation, determination and/or recommendation. The DEO submitted a log of the monthly meeting discussions with the Chairman of relevant EEO case determinations 2003-2007.

The required action was completed in May 2007.

4. **Consistent with the NYCHA's DEO Investigator's Manual, the Investigator should complete the investigation and issue the draft Investigation Report to the Assistant Director of the DEO within 90 business days of the filing of the complaint.**

The NYCHA stated that since the audit period, only one discrimination complaint investigation was not closed within the 90-day period.

Documentation was received at the Compliance Initiation Meeting in March 2007.

5. **In the event that there is some impediment to concluding the investigation within 90 business days, the reason for the delay should be noted in the OEO case file.**

The NYCHA provided a copy of the case history report which noted the reason for the delay in the closing of the case investigation.

Documentation was received at the Compliance Initiation Meeting in March 2007.

6. **The NYCHA should include a tagline indicating the agency is an equal opportunity employer on all internal and external job vacancy notices.**

The NYCHA provided two recent internal job vacancy notices and two external job vacancy notices that included a tagline indicating the agency is an equal opportunity employer.

Documentation was received at the Compliance Initiation Meeting in March 2007.

7. **The NYCHA's Chairman should disseminate an agency-wide memorandum to discuss audit findings.**

The attached memorandum from Chairman Tino Hernandez was distributed on June 20, 2007.

The required action was completed in June 2007.

Recommendation

Based on the above information, we recommend that the Equal Employment Practices Commission issue a Letter of Completion of Compliance to Chairman Tino Hernandez informing him that the NYCHA has implemented the recommended corrective actions to the Commission's satisfaction.

Respectfully Submitted,

Paul V. Laguerre
EEO Auditor/Compliance Officer

Eric Matusewitch
Deputy Director

Abraham May, Jr.
Executive Director

Attachment

NEW YORK CITY HOUSING AUTHORITY
EXECUTIVE DEPARTMENT

MEMORANDUM

TO: Distribution D

FROM: Tino Hernandez, Chairman

DATE: June 20, 2007

SUBJECT: **NEW YORK CITY EQUAL EMPLOYMENT PRACTICES COMMISSION AUDIT**

The New York City Equal Employment Practices Commission has completed an audit of NYCHA's equal employment opportunity programs, policies and procedures for the period covering July 1, 2003 through June 30, 2005 and randomly surveyed NYCHA employees about NYCHA's equal employment opportunity programs, policies and procedures.

I am pleased to announce that NYCHA's equal employment opportunity programs, policies and procedures are in compliance with the New York City Equal Employment Opportunity Policy. Further, in compliance with a recommendation by the Commission, the NYCHA non-discrimination policies are available by audio recording. NYCHA employees may listen to an audio recording of the NYCHA non-discrimination policies by dialing 212-306-4600.

As Chairman, I reaffirm NYCHA's strong commitment to maintaining fair employment practices for all employees and job applicants. Any employee or job applicant, who believes she/he may have been the victim of discrimination based on any federal, state or local equal employment opportunity law, may file a complaint with the Department of Equal Opportunity, Office of Employment Opportunities, located at 250 Broadway, 27th floor. Please call 212-306-4468 for additional information.

EQUAL EMPLOYMENT PRACTICES COMMISSION

City of New York
40 Rector Street, 14th Floor, New York, New York 10006
Telephone: (212) 788-8646 Fax: (212) 788-8652

Ernest F. Hart, Esq.
Chair
Manuel A. Méndez
Vice-Chair

Chereé A. Buggs, Esq.
Angela Cabrera
Veronica Villanueva, Esq.
Commissioners

Abraham May, Jr.
Executive Director

Eric Matusewitch, PHR, CAAP
Deputy Director

July 12, 2007

Tino Hernandez
Chairman
New York City Housing Authority
250 Broadway
New York, New York 10007

Re: Resolution #07/09–NYCHA/C: Implementation of Corrective Actions Pursuant to the Audit of Compliance by the New York City Housing Authority's (NYCHA) Equal Employment Opportunity Program (EEOP) from July 1, 2003 to June 30, 2005.

Dear Chairman Hernandez: Tino

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 New York City Housing Authority (NYCHA) for a period not to exceed six months. The compliance period was April 2007 through September 2007. The NYCHA's Final Compliance Report was submitted on June 28, 2007.

The goal of monitoring was to determine if the NYCHA 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, 2003 to June 30, 2005.

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 NYCHA 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 New York City Housing Authority 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, Director of DEO Fredrika Wilson, and Assistant Director of DEO Celeste Segure for the cooperation extended to the EEPC Compliance Unit during the compliance-monitoring period.

Sincerely,

Ernest F. Hart, Esq.,
Chair

C: Fredrika Wilson, Director of DEO
Celeste Segure, Assistant Director of DEO