

#07/12-945C

**RICHMOND COUNTY PUBLIC ADMINISTRATOR'S
OFFICE**

- Compliance Summary Report November 14, 2007
- Letter of Compliance Satisfaction November 14, 2007



EQUAL EMPLOYMENT PRACTICES COMMISSION

SUMMARY COMPLIANCE REPORT

Agency: Richmond County Public Administrator

Agency Head: Gary D. Gotlin, Commissioner

EEO Officer: Eva-Marie Cusack

Audit period: **January 1, 2005 – June 30, 2006**

Date of Preliminary Determination Letter:	<i>December 20, 2006</i>
Date of Response Letter:	<i>December 27, 2006</i>
Date of Final Determinations Letter:	<i>February 14, 2007</i>
Date of Response Letter:	<i>March 7, 2007</i>
Compliance Initiated:	<i>October 2007</i>
Compliance Completed:	<i>October 2007</i>
Covering Month:	<i>October 2007</i>

Date: **November 14, 2007**

Pursuant to the findings and recommendations of the Equal Employment Practices Commission's (EEPC) Audit of Compliance by the Richmond County Public Administrator (RCPA) EEO Program starting January 1, 2005 and ending June 30, 2006, EEPC initiated Audit Compliance with the RCPA in October 2007. The RCPA's final Monthly Compliance Report was submitted on October 19, 2007.

Documentation confirming the implementation of required actions #1 and #2 were provided at the October 8, 2007 compliance initiation meeting. (See attachment) The two remaining required actions were completed. The following is a summary of the compliance report:

3. The RCPA should provide basic EEO training to all current and new employees.

Ms. Cusack conducted EEO training to all RCPA employees on October 2, 2007. A copy of the EEO training syllabus was provided in RCPA's final monthly compliance report.

The required action was completed in October 2007.

4. The RCPA should disseminate an agency-wide memorandum to discuss audit findings.

The RCPA Commissioner distributed a memorandum to all RCPA employees to discuss the EEPC audit and the audit findings. A copy of the October 18, 2007 memorandum was attached to the final monthly compliance report.

The required action was completed in October 2007.

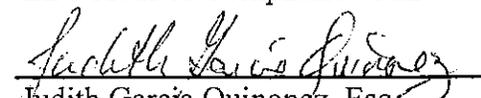
Recommendation

Based on the above information, we recommend that the Equal Employment Practices Commission issue a Letter of Completion of Compliance to Commissioner Gary D. Gotlin, informing him that the RCPA has implemented the recommended corrective actions to the Commission's satisfaction.

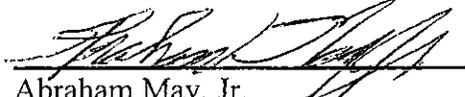
Respectfully Submitted,



Adrienne Smith
EEO Auditor/Compliance Officer



Judith Garcia Quinonez, Esq.
Counsel/Compliance Director



Abraham May, Jr.
Executive Director

Attachment

MEMORANDUM

To: All Richmond County Public Administrator Employees

From: Commissioner Gary D. Gotlin *gds*

Date: October 18, 2007

Re: Desk Audit of the Office of the Richmond County Public Administrator (RCPA) and its Compliance with the Equal Employment Practices Commission's Minimum Standards for Equal Employment Opportunity by Non-Mayoral Agencies With Less Than 15 Employees

This office was recently audited by the Equal Employment Practice Commission ("EEPC") pursuant to a mandate by the City Charter. The purpose of the EEPC audit was to ensure our adherence to the Equal Employment Practices Commission's Minimum Standards for Equal Employment Opportunity by Non-Mayoral Agencies with Less Than 15 Employees. The results of the Audit are discussed below:

- (1) The audit found that the office EEO Policy Statement did not fully reflect the recent changes to the New York City and New York State Human Rights Laws because the office policy did not list the updated protected classes of: gender (including gender identity); predisposing genetic characteristics (not "generic predisposition or carrier status"); and status as a victim or witness of domestic violence, sexual offenses and stalking. To address this finding, I updated our policy to reflect these changes by adding all the protected classes under the New York State and New York City Human Rights Laws in accordance with the Addendum to Equal Employment Opportunity Policy Standards and Procedures to Be Utilized by City Agencies (2005) dated December 14, 2006. A copy of our updated policy is enclosed.
- (2) The audit found that the office should provide appropriate EEO training (to its EEO Officer or the office should designate a trained EEO professional from another City agency to administer the EEO Program. To address this finding, Deputy Public Administrator Eva-Marie Cusack, Esq. completed the Department of Citywide Administrative Services (DCAS) Basic Training for EEO Representatives on June 14, 2007.
- (3) The audit also recommended that after the EEO Officer received the five-day training for EEO professionals from the Department of Citywide Administrative Services (DCAS), she should provide EEO refresher training to the RCPA employees based on the EEO training standards established by DCAS. On October 2, 2007, Deputy Public Administrator Eva-Marie Cusack, Esq. conducted EEO refresher training for all RCPA employees based on the EEO training standards established by DCAS.

We will report to the EEPC for a six-month period until March 31, 2008 following this audit to ensure our compliance. If you have any questions concerning this audit or the RCPA EEO policy or procedures, please ask myself, your EEO Officer Eva-Marie Cusack, Esq., or your office manager Carol Lee Guinta.



EQUAL EMPLOYMENT PRACTICES COMMISSION

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December 20, 2007

Gary D. Gotlin

Commissioner

Richmond County Public Administrator

130 Stuyvesant Place, Suite 402

Staten Island, New York 10301

Re: Resolution #07/12-945C: Implementation of Corrective Actions Pursuant to the Audit of Compliance by the Richmond County Public Administrator's Office (RCPA) Charter-mandated Equal Employment Opportunity Program from January 1, 2005 to June 30, 2006.

Dear Commissioner Gotlin:

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 Richmond County Public Administrator's Office (RCPA) for a period not to exceed six months. The compliance period was October 1, 2007 through March 31, 2008. The RCPA's Final Compliance Report was submitted on October 19, 2007.

The goal of monitoring was to determine if the RCPA implemented all recommended corrective actions pursuant to our audit of compliance by your agency with: 1) the mandates of the City's Equal Employment Opportunity Policy (EEOP); or 2) the EEPC positions.

After completing its review of the Compliance Report submitted by your agency, EEPC staff submitted a Compliance Summary Report for Commission review. This Commission has determined that the RCPA 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 Richmond County Public Administrator's Office is now in compliance with the mandates of the City's Equal Employment Opportunity Policy.

On behalf of this Commission, I want to thank you, Deputy Commissioner Eva-Marie Cusack, and Office Manager Carol Lee Guinta for the cooperation extended to the EEPD Compliance Unit during the compliance-monitoring period.

Sincerely,

for 
Ernest F. Hart, Esq.
Chair

C: D/C Eva-Marie Cusack, EEO Officer