

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

RESOLUTION #98/01-312: Preliminary Determination Pursuant to the Audit of the Conflicts of Interest Board and its compliance with the City Charter-mandated Affirmative Employment Plan from April 1, 1994 to September 30, 1996.

Whereas, pursuant to Chapter 36, Section 831(d)(2) and (5) of the New York City Charter, the Equal Employment Practices Commission (EEPC) is authorized to audit and evaluate the employment practices, programs, policies, and procedures of city agencies and their efforts to insure 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, the Equal Employment Practices Commission audited the Conflicts of Interest Board's compliance with the Affirmative Employment Plan; and

Whereas, in accordance with Chapter 36, Section 832(c) of the City Charter, the EEPC may make a preliminary determination pursuant to Section 831(d) that any plan, program, procedure, approach, measure or standard adopted or utilized by any city agency does not provide equal employment opportunity. Now, Therefore,

Be It Resolved,

that pursuant to the audit of the Conflicts of Interest Board (COIB) and its compliance with the City Charter-mandated Affirmative Employment Plan (AEP), the Equal Employment Practices Commission hereby affirms and adopts the following preliminary findings:

1. COIB has never issued EEO and sexual harassment policy statements or a discrimination complaint procedure.
2. There is no evidence that the AEP was distributed or made available to all employees.
3. COIB job advertisements and vacancy notices did not contain the EEO tag line.
4. Some agency doors and bathrooms do not meet ADA architectural standards.
5. The EEO Officer did not formally notify COIB employees of the identity of the EEO Counselors.
6. The agency did not conduct or provide preventive sexual harassment training for all employees.
7. The agency did not routinely send job notices to minority- and female-oriented organizations when vacancies arose.
8. Not all managers involved in interviewing received structured interview training.

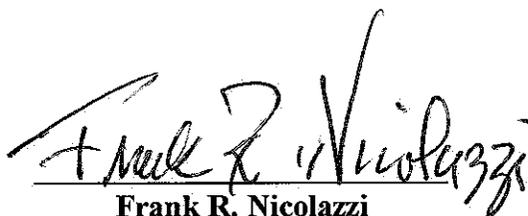
Be It Finally Resolved,

that the Commission authorizes the Chairman or the Vice-Chairman to forward a letter to the Director of the Conflicts of Interest Board, Mark Davies, formally informing him of the findings with appropriate explanations and recommendations and requesting, pursuant to Chapter 36 of the City Charter, his response to these findings within thirty days of receipt of the letter indicating what corrective actions the Conflicts of Interest Board will take to bring the agency in compliance with the New York City Equal Employment Opportunity Policy.

Approved unanimously on April 9, 1998.

Angela Cabrera
Commissioner

Jeannette Diaz, Esq.
Commissioner

A handwritten signature in black ink, reading "Frank R. Nicolazzi". The signature is written in a cursive style with a horizontal line underneath the name.

Frank R. Nicolazzi
Vice-Chairman

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

RESOLUTION #99/07-312C. Determination of implementation by the Conflict of Interests Board of recommended corrective actions made by the EEPC pursuant to its audit of the New York City Conflict of Interests Board's Affirmative Employment Plan from April 1, 1994 to September 30, 1996.

Whereas, pursuant to Chapter 36, Section 831(d)(2) and (5) of the New York City Charter, the Equal Employment Practices Commission (EEPC) is authorized to audit and evaluate the employment practices, programs, policies, and procedures of city agencies and their efforts to insure 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 its audit of the New York City Conflict of Interests Board, the Equal Employment Practices Commission issued a preliminary determination letter, dated April 9, 1998 setting forth its findings and recommended corrective actions; and

Whereas, in accordance with Chapter 36, Section 832 (c) of the City Charter, the EEPC was required to monitor the New York City Conflict of Interests Board for a six month period commencing June 1998; to determine whether it implemented the aforementioned corrective actions; and

Whereas, all of the aforementioned recommended corrective actions are required by the City's Equal Employment Opportunity Policy which replaced the former Affirmative Employment Plan (AEP); and

Whereas, the New York City Conflict of Interest Board submitted its Final Compliance Report in May 1999. Now, Therefore,

Be It Resolved,

that the New York City Conflict of Interests Board fully implemented all recommended corrective actions deemed necessary to ensure compliance with equal employment opportunity pursuant to the requirements of Chapter 35 and 36 of the City Charter.

Be It Finally Resolved,

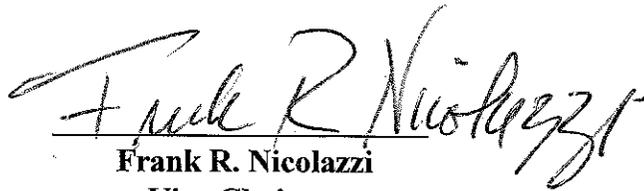
that the Commission authorizes the Vice-Chairman to forward a letter to the Executive Director of the New York City Conflict of Interests Board, Mark Davies, formally informing him that the agency has implemented all recommended corrective actions to the Commission's satisfaction.

Approved unanimously on June 24, 1999.

Manuel Mendez
Commissioner

Angela Cabrera
Commissioner

Jeanette Diaz
Commissioner


Frank R. Nicolazzi
Vice-Chair