

Diversity, Equity, Inclusion and Equal Employment Opportunity (DEI-EEO) Plan

Fiscal Year 2024

NYC Department of Records and Information Services



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I. Commitment and Accountability Statement by the Agency Head

[This statement provides the Agency Head with an opportunity to articulate, in their own language, the agency's commitment to the values of diversity, equity, and inclusion (DEI), and equal employment opportunity (EEO). It should proclaim the assurance of a discrimination-free workplace, integration of this plan into the agency's strategic mission, and a declaration that all senior executives, managers, supervisors, and employees are accountable for upholding these values and are charged, within their scope of responsibility, to effectively implement the agency's DEI-EEO Plan. It must include the name and contact information of agency EEO Officer.]

TO: All DORIS employees
FROM: Pauline Toole
SUBJECT: Equal Employment Opportunity Commitment
Date: December 18, 2023

As the Commissioner of the Department of Records and Information Services (DORIS), I remain fully committed to ensuring fair employment practices throughout the agency. The senior staff and I are familiar with the provisions and obligations set forth in both the City Charter and the City's Equal Employment Opportunity Policy ("EEO"). We are committed to developing a diverse and inclusive workforce that reflects the City's population.

I expect all managers and supervisors to actively promote work environments based on equity, inclusion and respect for all. Our goal is for employees, present and future, to view DORIS as a model employer. I am committed to ensuring that DORIS does not discriminate against employees or applicants for employment in any manner prohibited by federal, state and/or local laws. Our agency EEO program contains the following requirements:

Managers and supervisors must reaffirm their commitment to the agency's EEO policy at documented staff meetings at least once each year. They will discuss the right of employees to file EEO complaints with the Department's EEO officer and/or EEO counselors or with outside entities.

All staff involved in conducting employment interviews must review structured interviewing material prepared by the Chief Citywide Equity and Inclusion Officer and the agency's EEO Officer.

All staff should be aware of the identities of the agency's EEO personnel and how to contact them.

- LaTonya Jones, Director of Community and External Affairs, is the agency EEO Officer. Her office is located at 31 Chambers Street, Suite 305. Her telephone number is 212-341-6022 and her email is lcjones@records.nyc.gov.
- The agency's EEO Counselors are as follows: Michael Lorenzini, Ridhdhi Patel, Gerald Rosero and Urmi Udeshi. All are located at 31 Chambers Street. Michael Lorenzini visits both warehouses on a regular basis. Julie Chau is an EEO Counselor who is currently on leave.

Contact information is: mlorenzini@records.nyc.gov /212-788-8576; rpatel@records.nyc.gov /212-788-8599; grosiero@records.ny.gov /212-788-8610 and uudeshi@records.nyc.gov / 212-788-8634.

- Naomi Pacheco, Director of Administration, who is familiar with employment opportunities, is the agency Career Counselor and will provide career counseling to employees who request it. She is also the disability rights coordinator and 55A coordinator. Her office is located at 31 Chambers Street, Suite 304. Her telephone number is 212-788-8622 and her email is napacheco@records.nyc.gov. Employees interested in receiving counseling should contact her to make an appointment.

I encourage all employees to access the EEO resources available at DORIS, including materials accessible on the agency's intranet. Please contact LaTonya Jones with any concerns or questions you may have.

This statement is the same as last year.

This statement will be disseminated to all employees in the agency.

II. Recognition and Accomplishments

[Describe below key initiatives and accomplishments that your agency undertook last fiscal year (2023) to advance DEI and EEO goals, for example, recognizing employee contributions to DEI goals through awards and employee appraisal, introducing new equity programs, training all staff on mandatory training, or launching employee resource groups. Add additional lines as needed.]

In the past year, our agency accomplished the following as part of our commitment to DEI and EEO:

1. The agency began using the full functionality of NYCAPs for all agency job postings to maintain an applicant/candidate log and track the application-to-hiring lifecycle, from initial application through the interview process, and to the hiring decision, including the applicant/candidate log or tracking system must include the position, applicants'/candidates' names or identification numbers, race/ethnicity, gender, disability status, veteran status, interview date, interviewers' names, result (or disposition), reason selected/not selected for each applicant (disposition reason), and recruitment source.
2. As part of the agency's commitment to diversity, equity, and inclusion and in order to remain compliant with all city, state, and federal EEO regulations, the agency requested and received approval from OMB for three EEO roles, including an EEO Officer (dedicated full-time to serving in this capacity), a Diversity, Equity, and Inclusion College Aide, and EEO Coordinator through the Silver Star program.
3. The agency set and achieved a goal of having all staff complete the following trainings: Disability Awareness and Etiquette; Everybody Matters: EEO and Diversity & Inclusion (all modules); Sexual Harassment Prevention Training; Intro to Equity and Inclusion training; and lgbTq: The Power of Inclusion.

4. The agency required and implemented trainings in the following areas for all hiring panel members: eHire Interview Scheduling; eHire Interview Evaluation; and eHire Final Recommendation.

5. The agency held an agency-wide training day on December 20, 2022, which included the following components, among others: all-staff meeting; Department of Investigation training; WorkWell NYC ergonomics videos; Freedom of Information Law training; Health/Safety/Right to Know COSH training; and Cybersecurity Training.

III. Workforce Review and Analysis

Please provide the total agency headcount as of 6/30/2023

Total Headcount: 61

[This figure is available on the total line for your agency in the FY 2023 Q4 EBEPR210 CEEDS report]

[Pursuant to Local Law 27 (2023), provide an analysis of your agency's compensation data and measures to address pay disparity and occupational segregation in FY 2023. The term "occupational segregation" means a group's under-representation or over-representation in certain jobs or fields of work, when such group is protected by the employment related provisions of the city's human rights law and such group does not benefit from greater pay, responsibility, flexibility, stability, prestige, or other indicators of job desirability. To do this analysis, look at titles where pay disparity exists and salaries vary within the same title when compared by years of service. Also conduct a comparison of women and racial or ethnic minority group members.]

1.] [Look at titles where pay disparity exists and salaries vary within the same title when compared by years of service. Also conduct a comparison of women and racial or ethnic minority group members.]

The EEO Officer conducted a pay parity analysis of all senior staff roles at the NYC Department of Records and Information Services, in accordance with guidance provided by CEI. As DORIS is a small agency, the EEO Officer conducted salary comparisons internally (amongst similar roles and titles), as well as to other equivalently sized municipal agencies. The agencies used for comparison included: NYC Department of Cultural Affairs, the Landmarks Preservation Commission, Independent Budget Office, the Office of the City Clerk, the Tax Commission, NYC Office of the Actuary, the Mayor's Office of Media and Entertainment, and the NYC Department of Veterans' Services.

The agency determined the average deviation between the senior staff member's salaries and that of their counterparts (in a similar title) at other small agencies, as well as compared the deviation from the average based on the following attributes of senior staff: ethnic group, Hispanic origin, and gender. should look at the base salary, managerial level, years of service, number of staff, and scope of responsibilities for each title. The agency determined that there were pay disparities for some senior staff members in comparison to others with others in similar titles at other agencies and amongst senior staff, based on ethnic group, and based on Hispanic origin. Disparities were not found based on gender. Given that senior staff roles make up a small sample at DORIS (13 roles), broad conclusions about pay parity concerns are not possible. However, there were certain roles flagged for further review. The civil service titles where the greatest disparities were found were: community coordinator, administrative manager – non-managerial, and agency attorney.

DORIS is currently working to meet the PEG through the end of the fiscal year 2024 but will work with OMB over FY 2025 to close existing gaps among staff, progressively

prioritizing gaps in the areas of titles, ethnic groups, and Hispanic origin, as well as assess offers to new staff in order to avoid future gaps in compensation.

2. [Describe steps taken to encourage all employees at your agency to update self-ID information regarding race/ethnicity, gender, and veteran status through either NYCAPS Employee Self Service (ESS) or other means.]

In FY 2024, the agency will remind and encourage its employees to update self-ID information regarding race/ethnicity, gender, and veteran status through any of the following means:

NYCAPS Employee Self Service (by email; strongly recommended every year)

Agency's intranet site

On-boarding of new employees

Employees unable to complete the self-identification form using ESS will be provided an opportunity to submit paper form to the EEO Office.

In FY 2024, the agency will inform and remind employees of the option to add preferred name in ESS.

3. [Describe the review process of the quarterly CEEDS reports on workforce composition, utilization, and new hires and promotions data presented in your quarterly agency workforce dashboard and/or internal workforce reporting. Describe how your agency's EEO Officer, Personnel Officer and Agency Head work together to review demographic trends. These reports must be reviewed regularly with the Agency Head.]

The agency conducts quarterly reviews of the CEEDS workforce reports and the summary dashboard sent to the EEO Officer by DCAS' Citywide Equity and Inclusion (CEI) to provide demographic data and trends. The review includes an analysis of workforce composition by job title, job group, race/ethnicity, and gender for all employees; new hires, promotions, and separation data; and utilization analysis. The agency head, administrative personnel officer, agency attorney, and EEO Officer participate in quarterly meetings to review the above; in addition, the agency attorney, administrative personnel officer, and EEO Officer meet monthly to assess and strategize on HR and EEO matters, including underutilization.

[Note: If necessary, the agency can reach out to DCAS CEI for guidance on interpreting their underutilization reports. However, it is the agency's responsibility to use that data to inform its recruitment plans and efforts to reduce/eliminate underutilization.]

The agency conducts regular reviews of the CEEDS workforce reports and the summary dashboard sent to the EEO Officer by DCAS' Citywide Equity and Inclusion (CEI) to provide demographic data and trends. The review includes an analysis of workforce composition by job title, job group, race/ethnicity, and gender for all employees; new hires, promotions, and separation data; and utilization analysis.

[Select the options that apply to your agency.]

Agency Head

Quarterly Semi-Annually Annually Other _____

Human Resources

Quarterly Semi-Annually Annually Other _____

General Counsel

Quarterly Semi-Annually Annually Other _____

Other (Agency Attorney)

Quarterly Semi-Annually Annually Other _____

- The agency review entails a discussion concerning perceived workplace barriers for job groups that may surface in underutilization reports and for factors that may be creating these barriers (e.g., hiring patterns in specific job titles).

IV. EEO, Diversity, Inclusion, and Equity Initiatives for FY 2024

[State below the central goals of your strategy for FY 2024 focused on promoting equity, increasing diversity, assuring equal employment opportunity, and enhancing the value of inclusion at your agency. Categorize your goals according to the strategic area targeted.]

1. Goals and strategies to enhance DEI and EEO in areas of Workforce, Workplace, Community, and Race Relations.

❖ **Workforce:**

- Through the agency's LinkedIn site, the agency will engage potential employees and partner organizations as part of an outreach effort to expand more equitable recruitment.
- Continue to expand distribution lists for job postings in underutilized job categories, including recruiting from all of the established archives and library training programs in the country.
- Participate in outreach events to increase the diversity of our candidates, including attending job fairs, presenting to local Library and Information Sciences programs, etc.
- The EEO Officer will use DORIS' historical collections to promote interest in the agency and for recruitment.

❖ **Workplace:**

- All employees will participate in training sessions that explain how principles of inclusion can be used to review and update descriptions of archival and library materials.
- Each quarter, all agency staff will complete one of three 50-minute workshops offered by WorkwellNYC on the following subjects: implicit bias; ergonomics, and meditation.

❖ **Community:**

- In accordance with guidance provided by the NY State Historical Records Advisory Board, the Municipal Archives and Library will work to better document underrepresented people in the State's documentary heritage. This initiative will involve the following actions, among others: conducting a systematic review of collections to confirm use of inclusive and up-to-date descriptive terms to ensure finding aids, catalog records, and other metadata represent communities in a respectful manner; engage partners from marginalized communities in identifying BIPOC voices and stories in our holdings; and host facilitated conversations amongst staff, volunteers, and the communities you serve that address bias and systemic racism. The agency has recruited an AmeriCorps Member – who began in September 2023 - to help coordinate this effort.
- The agency will build on outreach efforts to various communities in the five boroughs, including the continuation of the WomensActivism.NYC and Neighborhood Stories projects – which have transitioned to virtual formats.
- The agency is also working to expand its collaborations with local K-12 schools by adding curriculum aids to its website for use by educators, partnering with local schools to gather 20,000 stories of inspiring women in the digital archive, and providing virtual tours of our Brooklyn Bridge materials to elementary students. In this effort, the agency has engaged a Volunteer Outreach Coordinator and two Educational Outreach Coordinators to work on the above projects, through the NYC Service and Silver Stars programs.

❖ **Equity, Inclusion and Race Relations Initiatives:**

- The agency will continue to offer expanded training opportunities aimed at improving staff skills, particularly in ways related to the agency's diversity and inclusion goals. This will include requiring expanded diversity, equity, and inclusion training opportunities for all senior staff members and encouraging all agency staff to take courses as well. Trainings will include topics such as: Department for the Aging's age inclusive strategies for the workplace and community series, Department of Citywide Administrative Services' Managing the Multi-Generational Workforce: Leveraging the Talents of 5 Generations training, etc.
- The agency has also used the ReServe program for the past three years– which connects retirees 50 years or older to part-time positions that allow them to remain active and serve their community. The ReServist works in the Community and External Affairs unit as a marketing consultant and will be working with the

agency's Volunteer Outreach Coordinator and Educational Outreach Coordinator to recruit retired educators in ReServe and similar programs to the agency's volunteer program.

- The agency has used the Silver Stars program at DFTA to recruit recent retirees from the City for critical roles across the agency.

2. Planned Programs, Initiatives, Actions

The agency will continue to seek out and share relevant workshops and training opportunities offered by other agencies, including the Department of Citywide Administrative Services, Workwell, and the Commission on Human Rights, among others, with all agency staff.

As described in our community goals above, the Municipal Archives and Library will be working with partners from marginalized communities to improve its collections descriptions and identify BIPOC voices and stories in its holdings. The agency will also continue to develop exhibits, public programs, and social media using the collections of the Municipal Archives and Library that offer new perspectives on the history of New York City.

A. Workforce

[In addition to the strategic goals above, please indicate here specific actions and initiatives planned with respect to Workforce.]

[Note: Please address the specific recruitment, selection and promotion strategies, sources, and procedures in Sections V and VI, below.]

[The actions listed below require internal agency collaboration and are not limited to the EEO Office.]

[Describe how your agency will address underutilization in FY 2024. Please mention here major job groups experiencing underutilization of women and minorities in your agency, and how your agency plans to address the underutilization. This should also include details of how the quarterly reports and dashboards will be used, partnership with the human resources office, initiatives around targeted recruitment, professional development for existing employees, and focus on civil service exams.]

The agency consistently experiences underutilization in the management specialists job category, based on race, gender, and the intersection of both race and gender. To address this underutilization, the agency is employing or planning to implement the following activities, among others: continuing to expand and update the outreach distribution e-mail list for open job postings; building relationships with library and information sciences schools; use DCAS newsletter for open postings; identifying publications that are likely to connect to BIPOC librarians and archivists; manually adding postings to other sites (including Handshake, Archivist's Roundtable, Metro Library Council, etc.); and expanding usage of LinkedIn to connect with diverse industry professionals and expand the reach of postings.

B. Workplace

[Describe specific actions designed to create inclusive workplace culture, enhance equity, and initiatives undertaken to address race relations in the agency. (e.g., modeling inclusive language such as preferred pronouns and age-inclusive language on job postings, celebrating heritage months, ensuring worksite and meetings are accessible, creating agency specific surveys or implementing initiatives based on previous agency specific surveys, etc.).]

The agency has a Quality of Work Life Committee, which includes 3 members of both line staff and senior staff. This group works to engage all agency staff in activities that improve the work environment, including organizing agency events (i.e., September, employee recognition ceremonies, etc.).

In FY2024, the agency will survey staff about their interest in creating an Employee Resource Group (ERG).

[Select the options that apply to your agency.]

- Promote employee involvement by supporting Employee Resource Groups (ERGs).

List below the names of existing ERGs:

- 1.
- 2.
- 3.
- 4.
- 5.

- Agency will create a Diversity Council to leverage equity and inclusion programs

- Agency Diversity Council is in existence and active

- Agency will sponsor focus groups, Town Halls and learning events on race, equity, and inclusion

- Agency will inform employees of their rights and protections under the New York City EEO Policy

Agency will ensure that its workplaces post anti-hate or anti-discrimination posters

C. Community

[In addition to the strategic goals above, please describe in details specific initiatives, programs and policies planned with respect to your agency's services to the community. This should include initiatives to enhance equity, improve community relations and increase awareness about services offered by your agency.]

The agency holds regular Lunch and Learn sessions open to the public. These sessions address topics of interest. such as the preservation of a historically black school in Chelsea and the evolution of Central Park. The agency also coordinates two community outreach efforts - WomensActivism.NYC, which aims to gather 10,000 narratives of inspiring women from around the world in a digital archive and is currently approximately 700 stories from that goal, as well as Neighborhood Stories, an oral history project gathering interviews with people from across the five boroughs. Both projects rely on agency volunteers and other community partners to help facilitate the projects or connect the agency with community members. The agency is also working to expand its collaborations with local K-12 schools by adding curriculum aids to its website for use by educators and students and providing free educational programs featuring the historical collections of the Municipal Archives and Library.

In FY 2024, the agency will:

- Continue or plan to promote diversity and EEO community outreach in providing government services
- Promote participation with minority and women owned business enterprises (MWBES)
- Conduct a customer satisfaction survey
- Expand language services for the public

V. Recruitment

A. Recruitment Efforts

[Summary of Recruitment Efforts – Include proactive strategies and practices your agency will use to build and retain a diverse and inclusive workforce. Strategies should include steps that will be taken to promote discretionary positions use of underutilization reports to inform recruitment efforts, review of current policies procedures and practices related to recruitment, training hiring managers and recruiters on D&I courses.

Additionally, the agency attorney, Administrative Personnel Officer, and EEO Officer meet monthly to review overlapping concerns and the agency's overall effort to implement best practices around HR and EEO. The EEO Officer circulates workforce statistics to the agency head, agency attorney, and HR administrator for review on a quarterly basis. The EEO Officer also meets weekly with the agency head. The agency head, agency attorney, Agency

Personnel Officer, and EEO Officer develop strategies to address underutilization collaboratively at the regular meetings.

In the first quarter of FY24 the agency conducted outreach to every college program offering archival degrees in order to identify the career counseling contact. The contact information for these individuals was added to a database. They are provided every posting for archival and library employees.

B. Recruitment for Civil Service Exams

[Summary of recruitment efforts that will be undertaken in FY 2024 to promote open competitive and promotion civil service exams.]

List any planned recruitment events for FY 2024 that will be held by the agency to promote open-competitive civil service examinations. [This list should be updated in your quarterly reports]

Event Date	Event Name	Borough

List planned expenditures for FY 2024 related to recruiting candidates for open-competitive and promotion civil service exams.

Borough	Approximate Dollar Amount (\$)
Bronx	0
Brooklyn	0
Manhattan	0
Queens	0
Staten Island	0

C. Recruitment Sources

[List diverse recruitment sources, the target population your agency hopes to reach through these resources and whether the use of these sources resulted in previous hires. Recruitment sources should reflect your agency's effort to reduce underutilization in specific job groups and to otherwise diversity your workforce.]

1. The agency uses the Handshake website to connect with local schools, amplify job postings, and recruit a more representative workforce from amongst the diverse student population of New York City.
2. The agency provides all job postings for broader distribution to Mayor's Office for People with Disabilities, as part of its 55A outreach efforts.
3. The agency distributes postings to online listings and list services targeting various communities, including ARMA International website, Simmons College, Long Island University, CUNY placement offices, all archival and library programs nationally, and historically black colleges and universities. This is part of the agency's efforts to address underutilization in the management specialists and clerical job titles by race and gender.
4. The agency provides all job postings in the Management Specialist titles to the Society of American Archives - Archives and Archivists of Color as part of an effort to address underutilization based on race.
5. The agency provides all job postings in the Management Specialist titles to the Society of American Archives - Latin American and Caribbean Cultural Heritage Archives (LACCHA) as part of an effort to address underutilization based on race.
6. The agency has a LinkedIn page and has used the platform to promote opportunities at the agency.

D. Internships/Fellowships

The agency provided the following internship opportunities in FY 2023:

Type of Internship\Fellowship	Total	Race/Ethnicity *[#s] * Use self-ID data	Gender * [#s] * Use self-ID data
1. Urban Fellows	0		M __ F__ Non-Binary __ Other __ Unknown __
2. Public Service Corps	1		M __ F_1_ Non-Binary __ Other __ Unknown __
3. Summer College Interns	15		M _6_ F_6_ Non-Binary __ Other __ Unknown _3_
4. Summer Graduate Interns	3		M _1_ F_1_ Non-Binary __ Other __ Unknown _1_
5. Other (specify): CUNY			M _1_ F_1_ Non-Binary __ Other __ Unknown __

E. 55-a Program

Section 55-a of the New York State Civil Service Law allows a qualified person with a certified mental or physical disability to be hired into a competitive civil service position without having to take and pass a civil service examination. The City encourages agencies to use the 55-a program as a tool to build a diverse workforce and create greater access to City employment for qualified candidates with disabilities.

- Presently, the agency employs __0__ [number] 55-a participants. [Enter '0' if none]
- There are __0__ [number] participants who have been in the program less than 2 years.
- In the last fiscal year, a total of __0__ [number] new applications for the program were received and __0__ participants left the program due to [state reasons] _____.

[Describe your agency's plans to utilize the 55-a Program to hire and retain qualified individuals with disabilities. This should include the goals for the Program, strategies your agency will use to educate hiring managers and those involved in the recruitment process, any challenges your agency has or foresee in recruiting and hiring 55-a candidates. If your agency hires for competitive titles and does not use the program, please explain why.]

The 55A Coordinator is the Agency Personnel Officer and involved in coordinating all aspects of the agency's recruitment process. The agency will continue to assess potential recruitment opportunities for 55A with future job vacancies and staff promotions. The agency currently has no employees participating in the 55A program. The agency will disseminate 55A information to all agency staff via email. The EEO Officer has also added information about 55A to the agency's intranet, including the FAQs document provided by DCAS. In addition, all job postings are shared with the Mayor's Office for People with Disabilities and Access VR for broader distribution.

- Agency uses mostly non-competitive titles which are not eligible for the 55-a Program.
- Agency does not use the 55-a Program and has no participating employees.

VI. Selection (Hiring and Promotion)

[Note: This section must be prepared in consultation with the Agency Personnel Officer.]

A. Career Counselors

[Describe the plans of the agency Career Counselor(s) to promote advancement and transfers within the agency, advise employees of opportunities for promotion, availability of civil service exams, and provide resources to help employees grow and develop future careers.]

The agency's Career Counselor promotes awareness of opportunities for promotion and transfer within the agency through regular emails of vacancy announcements, upcoming DCAS exam schedule, professional development training opportunities, upcoming DCAS civil service training

dates, etc. The Career Counselor also offers weekly office hours and by-appointment meetings, where staff can get guidance on HR matters.

B. New Hires and Promotions

[Describe planned actions to review and assess the current new hire and promotional procedures for selection, especially for mid- and high-level discretionary positions. Actions may include monitoring the representativeness and fairness of the selection and appointment process, vacancy posting protocols, training of hiring managers, procedures for interviewing applicants, the role of the EEO Officer in the selection and promotion actions, the use of the NYCAPS Applicant Interview Log Report, and efforts to identify and eliminate structural barriers to employment.]

The EEO Officer works closely with the Agency Personnel Officer to ensure that staff on hiring panels have received required training in Equal Employment Opportunity practices, structured interviewing and unconscious bias. The EEO Officer or one of the agency's EEO counselors serve as an observer on all agency hiring panels, including mid- and high-level discretionary positions. Additionally, all interview questions are reviewed and approved by both the Agency Personnel Officer and the EEO Officer. The agency works to ensure that hiring panels are composed of staff from diverse backgrounds. The agency will train hiring managers in the use of the NYCAPS Applicant Interview Log reports; the Agency Personnel Officer and EEO Officer will use the reports to track applicant sources and identify the best sources of applicants.

The agency uses a structured interviewing process, which includes EEO involvement at each stage of the hiring process and includes the following: all hiring managers must be trained in structured interviewing and unconscious bias; interview questions are reviewed by both the Agency Personnel Officer and EEO Officer; all hiring panels include an assigned EEO observer; the Administration Unit and the EEO Officer work together to ensure all postings – particularly those in underutilized job categories – are broadly distributed.

C. EEO Role in Hiring and Selection Process

[Briefly detail which stages of selection involve your EEO Officer (pre- and post-selection).]

In FY 2024, the agency EEO Officer will do the following:

- Ensure that all vacancy announcements include the revised NYC EEO I Anti-Discrimination Statement.
- Review vacancy postings to ensure elimination of language that has the potential for gender and age stereotyping and other unlawful discrimination. (It is recommended to use gender-neutral terms and pronouns and language that is age-inclusive).
- Actively monitor agency job postings and ensure recruitment strategy aligns with the diversity goals of the agency.

- Provide consultation regarding creation/review of objective criteria for evaluating candidates for hire or promotion and applying those criteria consistently to all candidates.
- In collaboration with the Director of Human Resources, review interview questions to ensure that they are EEO-compliant, job-related, and required by business necessity.
- Assist the hiring manager if a reasonable accommodation is requested during the interview.
- Observe interviews, when necessary, especially for underutilized job titles and/or mid- and high-level discretionary positions.
- Advise Human Resources to use candidate evaluation form for uniform assessment and equity.
- Periodically review candidate evaluation forms and conduct a job applicant analysis via the NYCAPS eHire Applicant Interview Log reports to advise Human Resources of any demographic trends and/or EEO concerns based on available self-ID data.
- Review hiring package to evaluate that the selection process was conducted in accordance with EEO best practices.
- Other: _____

D. Layoffs

During periods of layoffs, terminations, and demotions due to legitimate business/operational reasons, what is your protocol for analyzing the impact of such actions based upon gender, race, and age? *[It is most useful to conduct this analysis prior to finalizing the list of titles that will be impacted. Ensure that the Agency General Counsel and the Law Department are involved in the review.]*

- The agency will use the DCAS Layoff Procedure as guidance, should there be any layoffs, terminations, and demotions due to legitimate business/operational reasons in FY 2024.
- The agency will analyze the impact of layoffs or terminations on racial, gender, age groups, and people with disabilities.
- Where layoffs or terminations would have a disproportionate impact on any of these groups, the agency will document that the targeted titles or programs were selected based on objective criteria and justified by business necessity.
- The Agency Personnel Officer, EEO Officer and General Counsel will be involved in making layoff or termination decisions. It should be noted that layoffs must be conducted by seniority in compliance with civil service law (for competitive titles) and union contract (for non-competitive and labor class titles).

VII. Training

[Please refer to **Section IX** to ensure the agency complies with training requirements under local laws and Executive Orders.]

Training Topic	Type of Audience (e.g., All Staff, Front-line Employees, Managers, Supervisors, etc.)	Goal Number of Participants	Projected Dates
1. Everybody Matters: EEO and Diversity & Inclusion Training for NYC Employees (e-learning)	All employees, interns, and consultants – Biennially (Cycle 2 must be completed by March 31, 2025.)	70	Training is required of all employees, interns, and consultants and will be completed on a rolling basis as they join the agency.
2. Everybody Matters: EEO and Diversity & Inclusion Training for NYC Employees (classroom/live webinar)	All employees – Biennially (Cycle 2 must be completed by March 31, 2025.)		
3. Sexual Harassment Prevention (e-learning)	All employees – Annually (Cycle 6 runs between September 1, 2023 – August 31, 2024)	70	8/31/2024
4. Sexual Harassment Prevention (classroom/live webinar)	All employees – Annually (Cycle 6 runs between September 1, 2023 – August 31, 2024)		
5. IgbTq – Power of Inclusion (e-learning)	Managers, Supervisors, and Front-line employees (must be completed by March 31, 2024) All other employees	70	3/31/2024
6. IgbTq – Power of Inclusion (classroom/live webinar)	Managers, Supervisors, and Front-line employees (must be completed by March 31, 2024) All other employees		
7. Disability Awareness and Etiquette	All employees, interns, and consultants.	70	Training is required of all employees,

			interns, and consultants and will be completed on a rolling basis as they join the agency.
8. Structured Interviewing and Unconscious Bias (classroom/live webinar)	All new hiring panel members.	5	December 2023.
9. Other (specify) Cybersecurity trainings	All employees, interns, and consultants.	70	Training is required of all employees, interns, and consultants and will be completed on a rolling basis as they join the agency.
10. Other (specify) Hazardous Materials training	All employees, interns, and consultants.	70	

VIII. Reasonable Accommodation

[Please indicate the actions your agency will take to ensure that the process of reviewing reasonable accommodation requests is compliant with the EEO Policy as well as the applicable federal, state, and local laws. Additionally, please detail any best practices currently implemented in this area. Lastly, please describe your current appeal protocol.]

Describe your agency’s practices for analyzing statistics with regard to volume, trends, and speed of disposition of EEO complaints and reasonable accommodation requests and appeals:

The agency rarely receives EEO complaints or reasonable accommodation appeals but works proactively to keep staff informed about the process for both complaints and reasonable accommodations. The agency does regularly receive reasonable accommodation requests which are discussed monthly at meetings of the EEO Officer and Director of Administrative Operations. In those discussions, the EEO Officer and Director of Administrative Operations assess the volume and types of requests that are being made and what agency leadership can do to facilitate the process.

- Managers, supervisors, human resources personnel and discipline personnel are required to report to the EEO Office any reasonable accommodation requests and needs that are received, observed, learned about, or suspected, so that the EEO Office may facilitate discussions, research appropriate accommodations, and assist with the resolution of the matter.
- Absent of any undue hardship, the agency provides reasonable accommodation for disability, religion, victims of domestic violence, sex offense and stalking, pregnancy, childbirth, or a related medical condition.
- The agency follows the City's Reasonable Accommodation Procedure.
- The agency grants or denies request 30 days after submission or as soon as possible.
- The Agency Head or designee must review and grant or deny an appeal fifteen (15) days after submission of appeal.
- If the review and decision on appeal is not done by the Agency Head.
Provide the name and title of the designee¹ : _____
- The designee reports directly to the Agency Head.
- The agency will input the Reasonable Accommodation activity on the DCAS Citywide Complaint and Reasonable Accommodation (CAD) Database and update the information as needed.

¹ EEO Officer and General Counsel should **NOT** be appointed as agency head designee for review of appeals to reasonable accommodation decisions. Refer to the revised guidelines below. Note the conflict of interest; in the event of an external challenge to the denial of a reasonable accommodation, the agency's General Counsel would be tasked with defending the agency against a decision in which that office was a decision maker on appeal.

IX. Compliance and Implementation of Requirements Under Executive Orders and Local Laws

A. Local Law 92 (2018): Annual Sexual Harassment Prevention training

- The agency plans to train all new employees on Sexual Harassment Prevention within 30 days of start date.
- The agency will train all current employees on Sexual Harassment Prevention (Cycle 6 – September 1, 2023 – August 31, 2024) as indicated in the Section VII Training above.

B. Local Law 97 (2018): Annual Sexual Harassment and Complaint Reporting

- The agency will ensure that sexual harassment complaints, and all other EEO complaints, are investigated and closed within 90 days.
- The agency will input sexual harassment complaint data, as well as all other types of complaints, on the DCAS Citywide Complaint and Reasonable Accommodation (CAD) Database, contemporaneously update the information, and affirm the data in a timely manner when requested by DCAS.

C. Local Law 121 (2020): Age Discrimination Training

- The agency plans to train all new employees on Everybody Matters: EEO and Diversity & Inclusion Training for NYC Employees within 30 days of start date.
- The agency will train all current employees on Everybody Matters: EEO and Diversity & Inclusion Training for NYC Employees (Cycle 2: April 1, 2023 – March 31, 2025) as indicated in the Section VII Training above.

D. Local Law 27 (2023): Access to Workplace Facilities

- Employees have access to gender appropriate bathrooms and lactation rooms.
- Employees are provided with information on how to request workplace accommodations and has access to respective facilities, including access for individuals with disabilities.

[Local Law 27 requires listing a summary of schedule and workplace accommodations that are provided by your agency]. Select the types of accommodations that your agency has provided to your workforce in FY 2023.

- Reassignment
- Modification of Work Schedule
- Flexible leave
- Modification or Purchase of Furniture and Equipment
- Modification of Workplace Practice, Policy and/or Procedure
- Grooming/Attire

E. Local Law 27 (2023): Diversity and Inclusion Training for FY 2024

List of diversity and inclusion training for FY 2024 is included in section VII of this annual plan.

F. Executive Order 16: Training on Transgender Diversity and Inclusion

Under Executive Order No. 16 of 2016, the agency must provide supervisory and front-line staff training approved by DCAS on transgender diversity and inclusion. Pursuant to Executive Order No. 16, this training must be provided to all newly hired supervisory and managerial employees and line staff whose work tasks involve contact with the public. The current Cycle 4 runs from April 1, 2022, to March 31, 2024.

- The agency plans to train all new employees within 30 days of start date.
- All managers, supervisors, and front-line employees will be re-trained every two years, no later than the third quarter of the Fiscal Year, as indicated in Section VII Training above.
- In addition, all other employees will be trained or re-trained every two years, as indicated in Section VII Training above.
- The agency will ensure that the Transgender Restroom Access notice/poster is posted where required, e.g., on bulletin boards, near restrooms and, in digital form, where other EEO notices and announcements can be found.

X. Audits and Corrective Measures

[Please check the statement(s) that apply to your agency].

- The agency is NOT involved in an audit conducted by NYC EEPC or another governmental agency specific to our EEO practices.
- The agency is currently being audited or preparing responses to an audit conducted by the EEPC or _____ [another governmental agency – please specify] specific to our EEO practices. Upon forwarding our responses to the recommendations issued by the EEPC, the agency will submit to OCEI an amendment letter, which shall amend the agency plan for FY 2024 to include and implement EEPC recommendations that will be implemented during the fiscal year.
- The agency is subject to any other oversight or review by a federal, state or city civil rights agency [please specify] _____. [Please attach a copy of the document setting out the oversight parameters and the agency’s most recent report to the oversight agency.]
- Within the last two years the agency was involved in an audit conducted by the EEPC or _____ [another governmental agency – please specify] specific to our EEO practices.
- The agency will continue/be required to implement corrective actions during the year that this plan is in effect [please attach a copy of the audit findings.]
- The agency received a Certificate of Compliance from the auditing agency. [Please attach a copy of the Certificate of Compliance from the auditing agency.]

XI. Agency Head Signature

[Note: Agency Head's signature and date should be provided for final submission only after the agency receives approval of the plan by DCAS.]

Pauline Toole
Print Name of Agency Head


Signature of Agency Head

May 3, 2024
Date

Appendix A: Contact Information for Agency EEO Personnel

Agency EEO Office mailing address:

Johnnie Davis
 31 Chambers Street, Suite 304
 New York, NY 10007

	Title/Function	Name	Email	Telephone
1	Agency EEO Officer [indicate if 'Acting' or 'Interim']	Johnnie Davis	Jodavis1@records.nyc.gov	212.341.6036
2	Chief Diversity Officer/Chief MWBE Officer per E.O. 59	Johnnie Davis	jodavis1@records.nyc.gov	212-341-6036
3	ADA Coordinator	Naomi Pacheco	napacheco@records.nyc.gov	212-788-8622
4	Disability Rights Coordinator	Naomi Pacheco	napacheco@records.nyc.gov	212-788-8622
5	Disability Services Facilitator	Gerald Rosero	grosero@records.nyc.gov	212-788-8610
6	55-a Coordinator	Naomi Pacheco	napacheco@records.nyc.gov	212-788-8622
7	Career Counselor(s)	Naomi Pacheco	napacheco@records.nyc.gov	212-788-8622
8	EEO Training Liaison(s)	Naomi Pacheco	napacheco@records.nyc.gov	212-788-8622
9	EEO Counselor(s)	Michael Lorenzini	mlorenzini@records.nyc.gov	212.788.8576
1	EEO Counselor(s)	Urmi Udeshi	uudeshi@records.nyc.gov	212.788.8634

1	EEO Counselor(s)	Gerald Rosero	grosero@records.nyc.gov	212-788-8610
1	EEO Counselor(s)	Ridhdhi Patel	rpatel@records.nyc.gov	212.788.8599

[Please provide contact information (name, title, e-mail, telephone number and **full office address** if different from the main address above, for the following EEO roles at your agency. If several roles are performed by the same individual enter only the name in further entries. Insert additional rows as needed.]

Appendix B: Local Law 28 (2023) – Diverse Recruitment and Retention

Agency Name:

Local Law 28 of (2023) is a Local Law to amend the New York City charter and the administrative code of the City of New York, in relation to the evaluation and expansion of diverse recruitment and retention within the municipal government.

Pursuant to Local Law 28 (2023), each agency shall collect and submit the following information for the prior fiscal year to the Department of Citywide Administrative Services by **August 31, 2023**, and annually thereafter.

For each agency-specific training program your agency has that is required for, or relevant to, an applicant’s appointment to a position based on an open-competitive civil service examination or a promotion civil service examination, list the following [Include this information for each individual training program within your agency that was completed in FY2023. The table below can be duplicated. If your agency does not have a training program, write “N/A”]:

[Insert name of the Training Program]	Totals
# of applicants enrolled in such program	N/A.
# of applicants who completed the program	N/A.
# of applicants who passed and graduated from the program	N/A.
# of applicants who passed but did not graduate from the program	N/A.
# of applicants who did not pass or graduate from the program	N/A.
# of applicants who accepted any appointment offered based on graduation from the program	N/A.

List all expenditures related to recruiting candidates for open-competitive civil service examinations and promotion civil service examinations in FY 2023.

Borough	Approximate Dollar Amount Spent (\$)
Bronx	\$0
Brooklyn	\$0
Manhattan	\$0
Queens	\$0
Staten Island	\$0

Provide a list of recruiting events, including location, held, or attended by your agency to promote open-competitive civil service examination in FY2023.

Event Date	Event Name	Borough
	None.	

Provide a list of any preparatory materials developed for applicants or potential applicants for open-competitive civil service examinations or promotion civil service examinations, if applicable. [Include as attachments]