

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

**Fiscal Year 2024**

**Independent Budget Office**

**New York City  
Independent  
Budget Office**

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## Table of Contents

I. Commitment and Accountability Statement by the Agency Head .....	3
II. Recognition and Accomplishments .....	3
III. Workforce Review and Analysis .....	5
IV. EEO, Diversity, Inclusion, and Equity Initiatives for FY 2024.....	7
V. Recruitment.....	12
VI. Selection (Hiring and Promotion).....	16
VII. Training.....	19
VIII. Reasonable Accommodation .....	20
IX. Compliance and Implementation of Requirements under Local Laws and Executive Order 16 (2016).....	22
X. Audits and Corrective Measures .....	24
XI. Agency Head Signature .....	25
Appendix A: Contact Information for Agency EEO Personnel.....	26
Appendix B: Local Law 28 (2023) Reports.....	27

## I. Commitment and Accountability Statement by the Agency Head

[Statement issued by Agency Head on 3/5/24]

New York City agencies, including IBO, are equal employment opportunity (EEO) employers, dedicated to compliance with federal, state, and local laws prohibiting employment discrimination. I am personally committed to ensuring that IBO adheres to these laws and to the City's EEO policy. In addition, IBO is committed to creating a diverse workforce and ensuring that current and future staff members, regardless of race, ethnicity, gender, sexual orientation, physical challenge, or other protected class status, find IBO a welcoming and productive environment.

If you have any EEO related concerns, you should contact Indera Segobind, IBO's EEO Officer (who also serves as the agency's Disability Rights Coordinator), or Julia Konrad or Cole Rakow, our EEO Counselors. Indera, Julia, and Cole may be consulted at any time, during or after office hours, on matters related to EEO policy. Indera, Julia or Cole will arrange to meet with any staff member or IBO job candidate regarding EEO concerns inside or outside of the office upon request.

I am attaching a copy of IBO's EEO policy, which closely tracks New York City's EEO Policy. The City's policy can be obtained from IBO's EEO Officer or one of its EEO counselors. In addition, the policy is available online at: NYC DCAS Citywide EEO Policy. If you have suggestions or wish to contribute to IBO's efforts to adhere to the principles of EEO, please contact Indera, Julia or Cole.

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.]

During calendar year 2023 (end of FY 2023 and beginning of FY 2024), our agency accomplished the following as part of our commitment to DEI and EEO:

1. Mandatory training: IBO has successfully completed mandatory training on cycle.
2. Onboarding process: IBO revamped its onboarding process for new staff to ensure that EEO information is prominently included in all onboarding meetings and posted on agency's intranet

site, which is easily accessible and well-known to employees, as being the reference point for many frequently used materials. As part of the IBO staff onboarding, all new employees meet with the agency's EEO Officer, and are introduced to the EEO Counselors. The EEO Counselors later host another meeting for recently hired staff, to review EEO policies and procedures.

3. Since the appointment of its new director in March 2023, IBO consistently brings an equity lens to bear throughout its hiring process, aiming to increase participation by historically under-represented groups. Issues that could present potential barriers are subject to continuous and ongoing review, as recruitment and hiring issues are addressed every week at the regularly scheduled senior leadership team meeting, which includes 6 senior managers (including the EEO Officer) plus the IBO Director, and at separately scheduled recruitment status meetings, which are held whenever recruitment and hiring activities are underway. Between March 2023 and May 2024, IBO hired 16 new staff on non-managerial lines, at least half of whom we believe are people of color; 8 are women. In the effort to accomplish these results, IBO has engaged on EEO-related issues in several key ways, including but not limited to, expansion of advertising and recruitment outlets; establishment of a "peer interview" committee charged with reaching out to applicants who are selected for interview, to engage with them in a non-evaluative conversation, so as to ensure that all applicants have equal access to accurate information concerning IBO, its mission and the relevant skills/tasks for IBO staff; revision of IBO's internal job descriptions to clarify expectations and provide clear guidance concerning internal opportunities for professional and salary growth; extensive review and revision of internal pay scales for analytical staff to ensure equity relative to work experience, educational credentials and longevity with the agency; the creation of a small number of junior-level positions within the analytical staff for which an advanced degree is not necessarily required; and the commencement of an internship program.

4. Beginning in the Spring of 2023, IBO's new Director led an intensive agency-wide strategic planning effort, the first in the agency's history; this effort brought equity considerations to the forefront, both as regards internal organization and externally facing work activities.

5. IBO significantly reengineered its performance evaluation process to ensure clarity of expectations, consistency of evaluative standards across various job categories and team assignments, and the express inclusion (for supervisors) of accountability for EEO compliance. IBO continues to provide positive comments in performance appraisals, as well as opportunities to request training, to facilitate professional growth of its employees.

6. IBO continues to offer Employee Longevity Awards (none applicable during FY 24).

### III. Workforce Review and Analysis

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

**Total Headcount: 33**

[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.]

In responding to this task, it is important to note the following caveat. While IBO is currently working with DCAS on a comprehensive application to the NYS Civil Service Commission to classify its titles, because of the legacy titles that have been used at IBO for decades, it is not possible to derive meaningful information about pay disparity by reference to the existing titles. With a handful of exceptions, i.e., the Agency Director, the General Counsel, the ACCO and two PAA lines, all other staff at IBO as of 6/30/23, were classified as either "Budget Analyst IBO" or "Budget Analyst IBO – Managerial", both of which are legacy (temporary) titles unique to this agency. However, effective in May 2023, IBO's new director conducted a comprehensive review of the job responsibilities, educational credentials, and employment history (including longevity at IBO) of all analytical staff at the agency and then implemented a comprehensive reorganization. Non-managerial staff were assigned to the levels of analyst/economist, lead analyst/economist and senior analyst/economist, with specific salary bands for each level, designed to ensure that each staff person's salary reflected the above-listed factors. Each position description also included specific standards by which a staff person could move from one level to the next level. IBO also implemented a policy of small longevity-based step increases. The Director also reorganized the management team (during FY 24), via a series of internal promotions, so as to ensure that managers performing the same types of work receive the same compensation, again, with some differentials based on agency longevity. As of FY 24, IBO is confident that there is no pay disparity by gender, race or ethnic category within any functional category.

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.]

**[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. However, IBO has found the CEEDS data less than useful, as the classification process used to compile the CEEDS data categories does not align with what IBO staff actually do (nor with the required credentials and experience for their roles). Competitive civil service titles are not currently used for the professional staff of IBO, and probably will not be used even after the NYS Civil Service Commission process now underway reaches its conclusion. The existing titles do not accurately differentiate by required experience levels, nor even by which of the roles are managerial. Current CEEDS data appears to group IBO's Agency Head with its non-managerial line staff positions (most of whom are "Budget Analyst - IBO"). Similarly, the jobs data in CEEDS against which IBO's positions are mapped do not reflect positions with similar credentials or experience to the actual requirements at IBO. Over 75% of IBO's positions require advanced degrees, and such credentials are mission-critical for IBO to perform its unique Charter-mandated functions. It does not appear that the categories used in CEEDS bear any resemblance to the employment market that IBO is required to use, either for the agency as a whole or for the highly specialized

individual subject matter expertise and/or coding and analytical knowledge for which IBO must recruit when any given position on its roster becomes open. Because it cannot rely upon the CEEDS data as a measure of under- or over-utilization, IBO does not currently have any reference point for that determination. In fact, IBO does not have believe that its current workforce actually reflects either any under- or over-utilization in any relevant category. Nonetheless, any issues that could present potential barriers to equal employment opportunity in recruitment and hiring are addressed every week at a regularly scheduled senior leadership team meeting, which includes 6 senior managers (including the EEO Officer) plus the IBO Director, and at separately scheduled recruitment status meetings, which are held whenever recruitment and hiring activities are underway.

[Select the options that apply to your agency.]

#### **Agency Head**

Quarterly  Semi-Annually  Annually  Other \_\_\_CEEDS data is reviewed annually, and internal data is reviewed no less than quarterly \_\_\_\_\_

#### **Human Resources**

Quarterly  Semi-Annually  Annually  Other \_Same as above\_\_\_\_\_

#### **General Counsel**

Quarterly  Semi-Annually  Annually  Other Same as above

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:**

- [Workforce goals should be directed at the composition of your workforce, recruitment, retention, promotion, and professional development.]
- IBO will seek to re-affirm its EEO-related recruitment efforts for FY 2024 by continuing to search out professional organizations and associations targeted towards addressing

workforce imbalances and underutilization of Black/Hispanic/Latinx managers and Black management specialists with which we can advertise open positions. In addition to expansion of advertising and recruitment outlets, IBO will: establish a “peer interview” committee charged with reaching out to applicants who are selected for interview, to engage with them in a non-evaluative conversation, so as to ensure that all applicants have equal access to accurate information concerning IBO, its mission and the relevant skills/tasks for IBO staff; promulgate and maintain clear internal job descriptions; provide guidance concerning internal opportunities for professional and salary growth; conduct ongoing review of internal pay scales to ensure equity within the agency; add various junior-level and internship positions with lower educational credential requirements.

❖ **Workplace:**

- [Workplace goals have to do with inclusion, workplace culture, and employee activities.]
- From time to time, IBO conducts online employee surveys to obtain individual feedback on workplace culture. Beginning in the Spring of 2023, IBO’s new Director also led an intensive agency-wide strategic planning effort, the first in the agency’s history; this effort involved all members of the staff, with each person selecting topic areas to focus on (e.g., workforce/people, external audiences/engagement, publication process, etc.). This initiative was designed to bring equity considerations to the forefront, both as regards internal organization and externally facing work activities.
- As the need arises, IBO also takes steps to provide staff with tailored training that reinforces the concepts of inclusivity and diversity.
- IBO continues to seek to encourage productive conversations around equity and inclusion in our workplace and in our work products.

❖ **Community:**

- [Community goals should be directed at the external environment of your agency: the public and entities served by the agency.]
- The mission of the Independent Budget Office, since its inception, has been to provide non-partisan budgetary, economic, and policy analysis for the residents of New York City and their elected officials, and to increase New Yorkers’ understanding of and participation in the budget process. The agency does this by publishing reports and analyses, and by responding to requests from elected officials and their staffs, community boards, civic groups, the press, and the public at large. IBO regularly hosts visits from various international groups, CORO Fellows, and representatives of local elected officials throughout the City. Additionally, we meet with civic groups, and community and advocacy organizations to provide information about the city’s budget and its budget process.

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



- [Describe special initiatives to enhance equity, inclusion, and race relations in your agency programs and activities. (Age inclusivity, non-traditional minorities inclusion initiatives, engagement of traditional and older employees in inclusion efforts and discussion forums)]
  - IBO is currently planning engagement activities open to all employees, and recently sponsored a private tour for IBO staff of the Tenement Museum related to New York City's historical diversity, and is investigating opportunities for additional outside training similar to past trainings engaged with the Racial Equity Institute.

## 2. Planned Programs, Initiatives, Actions

### 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.]

IBO has dedicated a \$5,000 budget for the first time to additional EEO activities, which are planned to include trainings, speakers, and community engagement, such as trips to local museums focused on diversity within the city.

[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.]

- As noted above, IBO currently has no valid reference point from which to determine underutilization of women or minorities, and does not in fact believe that its current workforce reflects such under-utilization for any covered category. Nonetheless, IBO continues to examine its hiring and promotional practices through an equity lens on an ongoing basis.
- In FY 2024, IBO has commenced (with DCAS) a comprehensive evaluation of its existing title structure, and expects to apply to the NYS Civil Service Commission in FY 2025 for the classification of virtually all of the Agency's titles. This reclassification will impact all existing IBO positions except for 5 lines: two existing managerial non-competitive positions and two existing clerical/administrative competitive positions, plus the Agency Head (which is unclassified, as per all Agency Head positions). Through this process, IBO, upon advice of DCAS, currently anticipates that all of its positions will be classified as either exempt or non-competitive. Accordingly, while IBO does not discourage staff from applying for civil service examinations, it is not anticipated that such examinations would lead to hiring or promotional opportunities within our agency, although they could enable IBO staff to access positions elsewhere in City government.

- While the CEEDS data does not correspond to the employment market relevant to IBO, we will also continue to review the quarterly workforce report, as well as analyze our internal pre-employment survey, to ensure that we continue to ensure that IBO hiring and promotional efforts fully comport with the letter and spirit of EEO.
- Starting in FY 2023, IBO has implemented a mentoring program for all new hires to encourage personal and professional development. In addition, during FY 24, IBO implemented a more robust performance review system, where staff are empowered to set goals, in consultation with their managers, and also to receive formal feedback annually, and informal feedback on a more frequent basis. This evaluation process includes a specific EEO/DEI metric as part of the performance reviews of all managers. These efforts will allow us to continue to effectively promote from within.
- IBO will encourage all senior level and managerial staff involved in the hiring process to attend Unconscious Bias and Structural Interview training to the extent they have not previously done so.

## 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.).]

- IBO holds monthly get-togethers designed to foster inclusivity and camaraderie. IBO has sanctioned the formation of a staff affinity group (SAG) for all office analysts, economists, and other non-managerial staff, which includes clerical, publication, and tech staff. In 2021, the SAG adopted the following statement of purpose:
  - *The Staff Affinity Group (SAG) is an employee affinity group open to all non-managerial staff of the Independent Budget Office. The intended purpose of the group is to provide an open forum for discussion and collaborative decision-making on matters that impact IBO employees who meet the criteria for membership on a monthly basis. Any SAG-covered employee may submit items for discussion regardless of attendance record. Statements and decisions produced by SAG reflect the majority consensus of SAG members present at monthly meetings.*
  - SAG’s working groups have been engaged in improving agency policy and practices on issues like workplace conditions, pay equity, and Diversity, Equity & Inclusion.
- IBO has an ongoing book club where employees come together to discuss readings that generally focus on New York City history and themes of equity. We discuss how we might apply lessons learned from these historical readings to current events in the city and to our work as an agency.

- IBO uses standardized email signatures that include pronouns prominently displayed in the name line (if the employee wishes to disclose their pronouns).

[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. Staff Affinity Group (SAG)

- 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.]

- Analytical staff in the agency routinely provide informational analyses and data to a diverse mix of advocates, community groups, and local governmental entities.
- IBO has begun hosting a series of presentations about the budget and our role in the city, together with the Citizen Engagement Commission, to community boards in order to broaden contact with a wider and more diverse audience in the city
- IBO has appointed a Chief Outreach and Engagement Officer to broaden the agency's connection with more communities within the city
- IBO has engaged certified MWBE vendors for its purchases of goods and consulting services.
- IBO has retained a vendor to translate various of its publications into multiple languages, and is engaged with NYC OTI on an effort to join the CityNet platform, which will greatly expand IBO's access to translation functionality.

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.]

- With fewer than 50 full-time employees, and a stable workforce, IBO’s need to participate in recruiting job fairs is limited. We do reach out to CUNY routinely for job candidates, and often place job ads in Amsterdam News and El Diario. In addition, as IBO’s procurement portfolio is relatively small (our largest contract is our lease), IBO has limited opportunity to participate in the MWBE program. However, IBO has engaged certified MWBE vendors for its purchases of goods and consulting services, and the staff member responsible for purchasing has attended a Department of Small Business services training on seeking out MWBE vendors.
- IBO discusses the hiring process at all-staff meeting in which all employees are encouraged to provide ideas for expanding our outreach during the hiring process, so that we may reach as many communities as possible with job postings as they arise. IBO established a “peer interview” committee charged with reaching out to applicants who are selected for interview, to engage with them in a non-evaluative conversation, so as to reduce barriers and ensure that all applicants have equal access to accurate information concerning IBO, its mission and the relevant skills/tasks for IBO staff.
- IBO posts job notices for available positions within the agency using some or all of the following methods:
  - Electronic distribution to many city agencies
  - Posting on our own IBO website

- Listing on public service careers.org, Workplace Diversity Network, and the National Forum for Black Public Administrators, Idealist, Amsterdam News, El Diario, City Limits
- Electronic posting on the following:
  - Baruch - Weissman School of Arts & Sciences
  - Baruch's Marxe School of Public & International Affairs system
  - Carnegie Mellon, Heinz College
  - City College of New York (CUNY)
  - City University of New York
  - Columbia University, School of International & Public Affairs
  - Cornell University
  - Fordham University
  - LBJ School of Policy at the University of Texas Austin
  - Long Island University
  - The New School, Milano School
  - New York University, Wagner
    - Specifically, NYU Furman Center for Housing positions
  - Princeton University
  - Rutgers University
  - Seton Hall University
  - Syracuse University, Maxwell School
  - University of California Berkeley, Goldman School of Public Policy
  - University of Chicago, Harris School
  - UC Berkeley Goldman School of Public Policy
  - Teachers College Columbia University (Education positions)
  - Bank Street College (Education positions)
  - Stanford (Education positions)
- We also send postings to HBCUs via the HBCU Lifestyle Career Hub website.
- When hiring for General Counsel:
  - NYU Law School
  - Cardozo School of Law
  - Cornell Law
  - Touro Law
  - University at Buffalo School of Law
  - New York Law School
  - CUNY School of Law
  - Columbia Law
  - Rutgers Law School
  - Brooklyn Law School
  - Yale Laws School
  - Albany Law School

- Seton Hall Law
- Uconn School of law
- Quinnipiac University Law
- Drexel University School of Law's
- Syracuse Law
- Pace University Elisabeth Haub School of Law
- Fordham School of Law
- Hofstra Law
- National Native American Bar Association
- National Conference of Women's Bar Associations
- Metropolitan Black Bar Association
- NYC Bar Association

## 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]

None – IBO does not currently hire via the civil service examination process, and does not anticipate doing so in the future, other than for two administrative positions, both of which are currently occupied by incumbents.

Event Date	Event Name	Borough
	None	

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
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### 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. LinkedIn Search Engine – broad demographic reach - has resulted in previous hires
2. IBO website, IBO Facebook, IBO Twitter – broad demographic reach - has resulted in previous hires
3. Indeed Search Engine – broad demographic reach - has resulted in previous hires
4. University web sites/career service postings – broad demographic and geographic reach - has resulted in previous hires
5. Idealist Search Engine – broad demographic reach - has resulted in previous hires

### D. Internships/Fellowships

[Indicate the type of internship/fellowship opportunities available at your agency. Please provide the number of student interns/fellows employed in FY 2023 and their demographic profiles, based on self-ID data. Indicate your plans to provide internship/fellowship opportunities in FY 2024. What are the sources you plan to draw upon in recruiting and hiring interns? Are you providing opportunities for interns to advance to entry-level positions in your agency? Did the agency hire interns in the past? Explain the reason if your agency does not offer internship /fellowship opportunities.]

The agency provided the following internship opportunities in FY 2023: There were no interns in 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			M __ F__ Non-Binary __ Other __ Unknown__

3. Summer College Interns			M __ F__ Non-Binary __ Other __ Unknown __
4. Summer Graduate Interns			M __ F__ Non-Binary __ Other __ Unknown __
5. Other: Summer High School Interns			M __ F__ 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.]

Historically, IBO has had only two employees serving in competitive civil service titles. As the 55-a Program only applies to competitive civil service titles; the opportunities to participate are extremely limited. In the past IBO has employed people who might otherwise qualify for the 55-a Program, but were staffed under original jurisdiction titles, and therefore did not qualify. Although IBO has not actively recruited from the program, we are willing and able to make the necessary accommodations for people who have the skills and experience we need. The EEO officer typically assumes the duties of the 55-a coordinator.

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.]

- IBO's career counselor has and will continue to provide information to staff on both internal and external Professional Development training sources.
- The career counselor, together with the Agency Head and Senior Staff, has and will continue to provide agency staff with detailed information concerning internal advancement and promotional opportunities. I
- IBO notes, that in FY 2024 it commenced (with assistance from DCAS) a comprehensive evaluation of its existing title structure, and expects to apply to the NYS Civil Service Commission in FY 2025 for the classification of virtually all of the Agency's titles. This reclassification will impact all existing IBO positions except for 5 lines: two existing managerial non-competitive positions and two existing clerical/administrative competitive positions, plus the Agency Head (which is unclassified, as per all agency positions). Through this process, IBO, upon advice of DCAS, currently anticipates that all of its positions will be classified as either exempt or non-competitive. Accordingly, while IBO does not discourage staff from applying for civil service examinations, it is not anticipated that such examinations would lead to hiring or promotional opportunities within our agency, although they could enable IBO staff to access positions elsewhere in City government.
- In addition, citywide vacancy announcements, civil service exams notices and other career development information as well as explain the civil service process to staff and what it means to become a permanent civil servant.

## 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.]

- IBO has and will continue to implement a mentoring program for new hires.
- IBO will also encourage all senior level and managerial staff involved in the hiring process to attend Unconscious Bias and Structural Interview training, to the extent they have not already recently done so.
- IBO has implemented a new performance evaluation system. On an annual basis, staff will construct goals within four domains: 1) job knowledge/subject area knowledge, 2) work quality, productivity and timeliness, 3) communication and collaboration, 4) administrative/policy compliance. Supervisors will meet with staff to discuss goal setting, then conduct a check-in on progress towards those goals in January of the year. In June, supervisors will use the Performance Evaluation rubric to conduct performance reviews of staff. Supervisors are specifically evaluated on EEO compliance.

### 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 – Biennially (Cycle 2 must be completed by March 31, 2025.)	100% (36 employees)	Within roughly 30 days of new hire
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)	100% (36 employees)	First quarter FY 2024 (July-August 2023)
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	100% (36 employees)	January 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			
8. Structured Interviewing and Unconscious Bias (classroom/live webinar)			
9. Other (specify)			
10. Other (specify)			

### 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.]

IBO will make reasonable accommodations to qualified applicants and employees, when requests are made in connection with disabilities, religion, pregnancy, childbirth, or related medical condition and/or to accommodate individuals who are victims of domestic violence, sex offenses, reproductive health, or stalking, unless providing such accommodation would impose an undue hardship on the agency. Reasonable accommodations will be made to enable qualified applicants and employees to perform the essential functions of their jobs, or to enjoy the equal benefits and privileges of employment.

The EEO officer has implemented all newly revised reasonable accommodation procedural guidelines. IBO has integrated the new guidelines into its accommodation process by conducting an internal review of its current processes, procedures, and record-keeping practices.

The reasonable accommodation process is intended to be flexible and interactive, involving both the IBO EEO Officer and the applicant or employee requesting reasonable accommodation. The

process generally involves four steps plus an additional four steps for accommodations related to disabilities.

An applicant or employee may appeal to the IBO Director any supervisory action or failure to act pursuant to this procedure by which the applicant or employee believes he or she is aggrieved. Within 10 business days of receipt of the appeal, the IBO Director or his or her designee shall:

1. Obtain from the EEO Officer and review all documentation relating to the request for reasonable accommodation.
2. Meet with the supervisor and the applicant or employee.
3. Consult with the EEO Officer.
4. Review the essential job functions, job-related limitations involving the applicant's or employee's disability, and potential accommodations.
5. Evaluate the applicant or employee and supervisor preferences in accommodations, giving primary consideration to the employee's preferences.

For FY 2024, within 15 business days of receipt of the appeal, the IBO designee, who is currently the Special Assistant to the Director (a member of our Senior Team), shall issue a written determination on the request for reasonable accommodations, specifying what accommodation shall be provided, if any, and directing the supervisor to implement such accommodation promptly or communicate reasons for delay. The EEO Officer shall monitor implementation of the reasonable accommodation.

IBO's reasonable accommodation procedure is intended to ensure equal employment opportunities for employees with disabilities, but shall not impede the right of any employee to file a complaint with IBO's EEO Officer, an appropriate federal oversight agency under the American with Disabilities Act or the Rehabilitation Act of 1973, the State Division of Human Rights, the New York City Commission on Human Rights, or any other federal, state or local agency having jurisdiction over such matters, or in any court of competent jurisdiction.

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:

- 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 designee<sup>1</sup> :
  - 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.

## 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)

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<sup>1</sup> 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.

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 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.]

Louisa Chafee

\_\_\_\_\_  
Print Name of Agency Head



\_\_\_\_\_  
Signature of Agency Head

9/17/24

\_\_\_\_\_  
Date

## Appendix A: Contact Information for Agency EEO Personnel

**Agency EEO Office mailing address:**

[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.]

	<b>Title/Function</b>	<b>Name</b>	<b>Email</b>	<b>Telephone</b>
1.	<b>Agency EEO Officer</b> [indicate if 'Acting' or 'Interim']	Indera Segobind	<a href="mailto:inderas@ibo.nyc.ny.us">inderas@ibo.nyc.ny.us</a>	212-341- 6042
2.	<b>Agency Deputy EEO Officer</b> [if appointed]	NA	NA	NA
3.	<b>Agency (Chief) Diversity &amp; Inclusion Officer</b> [if appointed]	NA	NA	NA
4.	<b>Chief Diversity Officer/Chief MWBE Officer per E.O. 59</b>	NA	NA	NA
5.	<b>ADA Coordinator</b>			
6.	<b>Disability Rights Coordinator</b>	Indera Segobind	<a href="mailto:inderas@ibo.nyc.ny.us">inderas@ibo.nyc.ny.us</a>	212-341- 6042
7.	<b>Disability Services Facilitator</b>			
8.	<b>55-a Coordinator</b>	Indera Segobind	<a href="mailto:inderas@ibo.nyc.ny.us">inderas@ibo.nyc.ny.us</a>	212-341- 6042
9.	<b>EEO Investigator(s)</b>	Indera Segobind	<a href="mailto:inderas@ibo.nyc.ny.us">inderas@ibo.nyc.ny.us</a>	212-341- 6042
10.	<b>Career Counselor(s)</b>	Indera Segobind	<a href="mailto:inderas@ibo.nyc.ny.us">inderas@ibo.nyc.ny.us</a>	212-341- 6042
11.	<b>EEO Training Liaison(s)</b>	Indera Segobind	<a href="mailto:inderas@ibo.nyc.ny.us">inderas@ibo.nyc.ny.us</a>	212-341- 6042
12.	<b>EEO Counselor(s)</b>	Cole Rakow Julia Konrad	<a href="mailto:coler@ibo.nyc.ny.us">coler@ibo.nyc.ny.us</a> <a href="mailto:juliak@ibo.nyc.ny.us">juliak@ibo.nyc.ny.us</a>	212-341-6092 332-268-4624

13.	Other: Chief Outreach and Engagement Officer	Taina Guarda	tainag@ibo.nyc.ny.us	212-341-6045
14.	Other: Special Assistant to the Director (EEO/RA initial designee)	Marla Simpson	marlas@ibo.nyc.ny.us	917-623-0828

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

**Agency Name: IBO**

**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”]:

<b>[Insert name of the Training Program]</b>	<b>Totals</b>
# of applicants enrolled in such program	0
# of applicants who completed the program	0
# of applicants who passed and graduated from the program	0
# of applicants who passed but did not graduate from the program	0
# of applicants who did not pass or graduate from the program	0
# of applicants who accepted any appointment offered base on graduation from the program	0

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

