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**BY EMAIL**

September 21, 2022

Amy Loprest  
Executive Director  
New York City Campaign Finance Board  
100 Church Street, 12th Floor  
New York, New York 10007

**Audit Status:**

Evaluation of Employment Practices with a Focus on Underutilization for Audit Period July 1, 2019 to December 31, 2021.

**Determination: FINAL**

**Resolution #: 2022AP/260-004-(2022)**

Dear Executive Director Loprest:

On behalf of the members of the Equal Employment Practices Commission (EEPC), thank you and your agency for the continued cooperation extended to our staff. This document serves as a follow-up evaluation and Final Determination to the following:

Preliminary Determination Issued on: August 11, 2022

Response Received: August 25, 2022

**Purpose**

New York City Charter (City Charter) Chapter 36 empowers the EEPC to audit and evaluate the employment programs, practices, and procedures of City agencies and their efforts to ensure fair and effective equal employment opportunity (EEO) for women and minority employees and applicants. To that end, City Charter Chapter 36 requires the EEPC to conduct audits of City agencies, entities, and offices of elected officials at least once every (4) years to ensure that their employment program is properly structured, efficiently administered, and in compliance with federal, state, and city equal employment opportunity requirements. To the extent that it does not, the EEPC is authorized to make a determination that the agency's employment plan, program, or procedure does not provide equal opportunity; require appropriate corrective action as needed; and monitor the implementation of the prescribed corrective action.

City Charter Chapter 36 also requires that (1) the EEPC assign a compliance monitoring period to monitor the New York City Campaign Finance Board's efforts to eliminate areas of non-compliance, if any; and (2) the New York City Campaign Finance Board respond in thirty (30) days and submit updates each month during its compliance monitoring period on the progress of its efforts to correct remaining areas of non-compliance.

**This is the EEPC's Final Determination regarding the audit, review, and evaluation of the New York City Campaign Finance Board's Employment Practices with a Focus on Underutilization.** Its purpose is to identify corrective action(s) that were modified or eliminated based on verified information submitted as part of the optional response to the Preliminary Determination and identify remaining corrective action(s) that require further monitoring to ensure implementation.

### Next Steps

#### ***Mandatory Final Determination Response***

Within thirty (30) calendar days of the issuance of this Final Determination, the New York City Campaign Finance Board is required to submit a written response to the EEPC's findings. This mandatory response must be signed by the agency head, addressed to the EEPC's Executive Director, and uploaded to the EEPC's compliance monitoring system, TeamCentral.

### Compliance Monitoring Period

**The assigned compliance monitoring period is: October 1, 2022 to January 31, 2023. Correcting all areas of non-compliance without delay is highly encouraged and will serve to shorten this period.**

The ***Monitoring Required*** section below sets forth the assigned corrective actions that the EEPC will monitor for implementation.

#### ***If No Corrective Actions Remain:***

The New York City Campaign Finance Board must submit a mandatory Final Determination Response acknowledging the EEPC's findings. Upon the EEPC's receipt of this acknowledgement, the New York City Campaign Finance Board will be exempt from a compliance monitoring period.

#### ***If Corrective Actions Remain:***

The signed mandatory Final Determination Response (referenced above) should indicate, for each remaining corrective action, (1) the date by which the New York City Campaign Finance Board intends to implement it, and (2) what steps the New York City Campaign Finance Board has taken, or will take, to correct it during the designated compliance monitoring period.

The New York City Campaign Finance Board will be monitored until all identified areas of non-compliance have been sufficiently corrected. During the assigned compliance monitoring period, the agency is required to submit updates during the first week of each month, or more frequently if possible, on its progress toward implementation of each corrective action. These required updates, and documentation to support the implementation of each corrective action, must be uploaded to TeamCentral, the EEPC's electronic compliance monitoring system. Instruction on how to access and navigate TeamCentral is attached.

Upon the implementation of all assigned corrective actions, the EEPC will issue a *Determination of Compliance* at its next scheduled meeting.


***Determinations of Non-Compliance or Partial-Compliance***

If New York City Campaign Finance Board is unable to rectify all areas of non-compliance in its EEO program within the assigned compliance monitoring period, its Agency Head may be required to appear before the EEPC Board during its next public meeting to explain why the New York City Campaign Finance Board was unable to fully implement all assigned corrective actions. The EEPC may also issue a *Determination of Non-Compliance* or *Determination of Partial-Compliance* and add the New York City Campaign Finance Board to the next year's audit plan for a follow-up audit.

**Conclusion**

This is the EEPC's Final Determination in this audit. Once again, the EEPC thanks you and your staff for your assistance during this audit and looks forward to completing compliance monitoring expeditiously to ensure that your agency's EEO program remains in compliance with all applicable laws, regulations, and best practices.

Sincerely,

  
Jeanne M. Victor  
Executive Director

c: Joseph Gallagher, Senior Counsel and Interim Principal EEO Professional, New York City Campaign Finance Board  
Kirann Nesbitt, EEO and Diversity & Inclusion Officer, New York City Campaign Finance Board  
Jennifer Shaw, Esq., Executive Agency Counsel/Director of Compliance, EEPC  
ilacia Zuell, Manager, EEO Analysis and Audit Unit, EEPC  
Menelik Allsop, Manager, EEO Analysis and Audit Unit, EEPC  
Imani Bowen, EEO Program Analyst, EEPC

Enclosed: TeamCentral Agency Manual

## FINAL DETERMINATION

After reviewing the optional response<sup>1</sup> (if applicable) to the EEPC's Preliminary Determination, our Final Determination is as follows:

### Agree

Regarding your responses to the following EEPC required corrective actions, we Agree based on documentation that is attached to your response.

#### **Corrective Action #1:**

Distribute and/or post a paper or electronic copy of the City of New York Equal Employment Opportunity Policy – or an entity-specific EEO policy, which conforms to city, state, and federal EEO laws and includes: current contact information for the entity's EEO Professionals and federal, state, and local agencies that enforce laws against discrimination; uniform procedures for investigating discrimination complaints and providing reasonable accommodations; and a current list of protected classes under City and State Human Rights Laws. If posted (electronic or hard copy), ensure employees are annually informed of the location of the document(s). Ensure all links to the policy, procedures, and related forms are operable and that all documents are current.

#### **Agency Response:**

*“Attached please find the CFB's updated EEO Policy as of August 24, 2022. See Appendix A at pages 3- 11). The new policy, inclusive of cannabis use protections (see page 3), was emailed to all staff on August 24, 2022. See Appendix A at pages 1-2.”* The agency submitted an April 24, 2022, *EEO Bulletin, Links, Policies and Contact Information* email, and PDF copies of the *CFB Equal Employment Opportunity Policy and Complaint Procedure and Equal Employment Opportunity Policy, City of New York, 2021*.

#### **EEPC Response:**

The EEPC accepts the agency's response and documentation provided as confirmation that Corrective Action #1 has been implemented. CFB's April 24, 2022, *EEO Bulletin, Links, Policies and Contact Information* email demonstrated that all employees were provided the current contact information for the entity's EEO Professionals and PDF copies of the *CFB Equal Employment Opportunity Policy and Complaint Procedure and Equal Employment Opportunity Policy, City of New York, 2021*. Both EEO Policies conformed to city, state, and federal EEO laws and included the current contact information for the federal, state, and local agencies that enforce laws against discrimination; uniform procedures for investigating discrimination complaints and providing reasonable accommodations; and a current list of protected classes under City and State Human Rights Laws.

#### **Corrective Action #2:**

Submit to the EEPC an annual entity-specific equal employment opportunity (EEO) plan, which includes a training plan, and quarterly reports on efforts to implement the plan, within 30 days following each quarter.

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<sup>1</sup> Excerpts are italicized.

Agency Response:

*“Attached please find a copy of the EEO FY 2022 Annual Plan, dated, approved, and endorsed by the CFB’s Executive Director, [Name redacted]. See Appendix B at page 37.”* The entity provided a copy of its *Diversity and Equal Employment Opportunity Plan* for fiscal year 2022.

EEPC Response:

The EEPC accepts the agency’s response and documentation provided as confirmation that Corrective Action #2 has been implemented. CFB’s *Diversity and Equal Employment Opportunity Plan* for fiscal year 2022 was signed and dated by the Agency Head and included a training plan.

**Corrective Action #6:**

Designate an EEO or human resources professional (such as a Disability Rights Coordinator or ADA Coordinator) who is responsible for: ensuring compliance with all city, state, and federal laws, and City and entity policies pertaining to persons with disabilities; receiving reasonable accommodation requests; engaging in a cooperative dialogue with requestors; and recommending appropriate outcomes for requests. Annually inform employees of this person’s contact information. Document all reasonable accommodation requests and their outcomes.

Agency Response:

*“Attached please find the CFB’s updated EEO Policy as of August 24, 2022. See Appendix A at pages 3- 11). The new policy was emailed to all CFB staff on August 24, 2022. See Appendix A at pages 1-2. The email notifies staff that [the principal EEO Professional] is the Disability Rights Coordinator. See id. at page 1. The EEO Policy states that [the principal EEO Professional] is the Disability Rights Coordinator. See id. at pages 7-8. Attached is a screenshot of the CFB’s intranet page indicating [the principal EEO Professional]’s contact information as the ADA Coordinator. See Appendix F at 1. Also attached is [the principal EEO Professional]’s Key Responsibilities document which designates [the principal EEO Professional] as the CFB’s Disability Rights Coordinator. See Appendix F at pages 3- 4.”* The entity provided a screenshot of its *EEO (Equal Employment Opportunity)* intranet page and the *Key Responsibilities & Performance Requirements Form* for its principal EEO Professional.

EEPC Response:

The EEPC accepts the agency’s response and documentation provided as confirmation that Corrective Action #6 has been implemented. CFB’s *EEO (Equal Employment Opportunity)* intranet page designated that the entity’s principal EEO Professional also served as the Disability Rights Coordinator. In addition, the *CFB Equal Employment Opportunity Policy and Complaint Procedure* (which was distributed to all employees on August 24, 2022) informed all employees of the Disability Rights Coordinator’s name, email address and telephone number.

**Corrective Action #8:**

Designate EEO or human resources professional(s) to annually assess recruitment efforts for discretionary (non-competitive class) titles to determine whether such efforts adversely impact any particular racial, ethnic, disability, or gender group.

Agency Response:

*“The CFB’s Executive Director, EEO Officer, and Director of HR meet at least annually to discuss recruitment efforts for discretionary titles to determine whether any particular group is adversely impacted. Attached are*

*the Key Responsibilities of the Director of HR and the EEO officer indicating that it is part of their job duties to collect and analyze EEO data and information in the hiring process and to review the agency hiring practices and implement new policies and procedures for diverse and inclusive recruitment. See Appendix F at pages 2-4, and 6.”* The entity provided its *Key Responsibilities & Performance Requirements Form* for both its EEO, Diversity & Inclusion Officer (principal EEO Professional) and Director of Human Resources.

**EEPC Response:**

The EEPC accepts the agency’s response and documentation provided as confirmation that Corrective Action #8 has been implemented. CFB’s *Key Responsibilities & Performance Requirements Form* designated both its principal EEO Professional and Director of Human Resources to assess recruitment efforts for the agency to determine whether such efforts adversely impact any particular racial, ethnic, disability, or gender group, which includes assessing recruitment efforts for discretionary (non-competitive class) titles.

**Monitoring Required**

The agency’s implementation of the following required corrective actions will be monitored during the assigned compliance monitoring period.

**Corrective Action #3:**

Appoint a principal EEO Professional to implement EEO policies and standards within the entity. Ensure the principal EEO Professional is trained regarding city, state, and federal EEO laws; the requirements of the entity’s EEO policies, standards, and procedures; and the prevention, investigation, and resolution of discrimination complaints.

**Agency Response:**

*“The CFB’s current EEO Officer, [principal EEO Professional], was hired at the CFB on April 25, 2022. Attached please find supporting documentation of [the principal EEO Professional]’s past and future EEO-related trainings, including an application to attend the September 8, 2022 EEO Officer Essentials DCAS training (see Appendix C at pages 1-3), a screenshot of [the principal EEO Professional]’s calendar indicating attendance at the EEO Officers Overview Training on May 19, 2022 (see Appendix C at page 4), and a list of all of [the principal EEO Professional]’s recently completed DCAS trainings (see Appendix C at page 5).”* The agency also provided training logs for the principal EEO Professional.

**EEPC Response:**

The EEPC recognizes the agency’s commitment to implement Corrective Action #3. CFB training logs indicate that the principal EEO Professional took *EEO Officers Overview Training* (which provided training regarding city, state, and federal EEO laws and the requirements of the entity’s EEO policies, standards, and procedures) in May 2022 and is scheduled to take *EEO Officers Essentials: The Complaint and Investigative Process* on September 8, 2022. To demonstrate compliance, provide documentation that the principal EEO Professional completed *EEO Officers Essentials: The Complaint and Investigative Process* or was otherwise trained on the prevention, investigation, and resolution of discrimination complaints. Implementation of this corrective action will be monitored during the assigned compliance-monitoring period.

**Corrective Action #4:**

Where the entity's organizational structure necessitates multiple EEO professionals, select such individuals from different office locations and, where possible, from a variety of levels within the organizational structure. Appoint EEO professionals who are trained in EEO laws and procedures, and their responsibilities under the EEO Policy.

**Agency Response:**

*"Attached please find supporting documentation demonstrating the completion of DCAS EEO-related trainings by the CFB's two EEO Counselors, [Names redacted]. See Appendix D at page 1. Also attached are the applications for both counselors to attend the September 8, 2022, EEO Officer Essentials DCAS training. See Appendix D at pages 2-7. Additionally, attached please find EEO Counselor [Name redacted]'s application and interest form from November 10, 2020, describing the responsibilities of the position and [Name redacted]'s previous experiences relevant to the position. See Appendix D at pages 8-11."*

**EEPC Response:**

The EEPC recognizes the agency's commitment to implement Corrective Action #4. The *CFB Equal Employment Opportunity Policy and Complaint Procedure* established that the entity's two EEO Counselors were to serve as liaisons to the principal EEO Professional and answer any EEO related questions. Training logs indicated that CFB's two EEO Counselors were trained in EEO laws and procedures via completion of the following courses: *Everybody Matters – EEO and Diversity and Inclusion*; *Sexual Harassment Prevention: What to Know About Unlawful and Inappropriate Behaviors in the Workplace*; *IgbTq – The Power of Inclusion*; and *Disability Awareness and Etiquette* in June and July of 2022. In addition, the Department of Citywide Administrative Services Citywide Training Center (DCAS CTC) application form indicates that CFB's EEO Counselors are scheduled to take *EEO Officers Essentials: The Complaint and Investigative Process* on September 8, 2022. To demonstrate compliance, provide documentation that demonstrates that the EEO Counselors completed *EEO Officers Essentials: The Complaint and Investigative Process*, or were otherwise trained on the prevention, investigation, and resolution of discrimination complaints. Implementation of this corrective action will be monitored during the assigned compliance-monitoring period.

**Corrective Action #5:**

Ensure that human resources professionals, managers, supervisors, and other personnel involved in recruiting and hiring are trained on the use of uniform, job-related techniques (such as training on structured interviewing) and trained to consider EEO laws/policies (such as training on unconscious bias, diversity and inclusion, etc.) to identify, interview, and select the most capable candidates.

**Agency Response:**

*"The CFB's intranet HR Hub provides direct links to all hiring procedures, trainings, and other hiring related documents. See Appendix E at page 1. Attached please find the CFB's Hiring Procedures & EEO Policies training presentation available to all employees involved in the hiring process. See Appendix E at pages 2-47. This training contains guidance on structured interviewing (see Appendix E at pages 17- 22), unconscious bias (id. at pages 5-10), and EEO laws and policies (id. at pages 36-39, 43-45). Additional guidance on structured interviewing and unconscious bias are also provided to interviewers through the CFB's intranet page. See id. at pages 55-84. Also Attached please find the agency's Temporary Emergency New Hire Process (see Appendix E at pages 48-54. This plan has been used during the COVID-19 pandemic and directs the hiring team to draft structured interview questions to be asked of all candidates according to the Hiring Procedures Policies training presentation discussed above. See Appendix E at page 52. Furthermore, the CFB intends to enhance our internal trainings with DCAS-offered trainings in all of these*

areas.” CFB provided its *Hiring Procedures & EEO Policies: New Procedures, EEO Requirements, EEO Logs, Structured Interviewing, and Best Practices* Power Point and its *Temporary Emergency New Hire Process*.

EEPC Response:

The EEPC recognizes the agency's commitment to implement Corrective Action #5. CFB's *Hiring Procedures & EEO Policies: New Procedures, EEO Requirements, EEO Logs, Structured Interviewing, and Best Practices* Power Point and its *Temporary Emergency New Hire Process* each contained uniform, job-related techniques (such as training on structured interviewing, reviewing resumes, and interview questions) and EEO laws/policies (such as training on unconscious bias) that, if distributed amongst personnel involved in recruiting and hiring, would ensure that they would be trained to identify, interview, and select the most capable candidates. To demonstrate compliance, provide the EEPC with the names of personnel involved in recruiting or hiring (human resources professionals, managers, supervisors, etc.) and documentation to demonstrate these personnel received the aforementioned trainings or were otherwise trained on the use of uniform, job-related techniques (such as training on structured interviewing) and trained to consider EEO laws/policies (such as training on unconscious bias, diversity and inclusion, etc.) to identify, interview, and select the most capable candidates. Implementation of this corrective action will be monitored during the assigned compliance-monitoring period.

Corrective Action #7:

Ensure that the principal EEO Professional, principal Human Resources professional (or designee), and Agency Head review the entity's statistical information (e.g. workforce, hires, promotions, and separations by race/ethnicity and gender), as part of the entity's employment practices and policies on an annual basis to identify whether there are barriers to equal employment opportunities and determine what, if any, actions are required to correct deficiencies (e.g. underutilization or adverse impact). Document the data reviewed, barriers identified (if any), and the entity's strategy to address each barrier.

Agency Response:

“Attached please find an email dated January 28, 2021, indicating that the underutilization reports are reviewed by the CFB's Executive Director [Name redacted], Director of HR (interim/retired- [Name redacted]), EEO Officer (interim-[Name redacted]), and General Counsel (interim/retired-[Name redacted]). See Appendix G at page 1. As needed, the Executive Director schedules meetings with the Director of HR and/or the EEO Officer to discuss the statistical information to identify any barriers to equal employment opportunities at the agency. See Appendix G at pages 9-10. Attached are the Key Responsibilities of the Director of HR and the EEO officer indicating that it is part of their job duties to collect and analyze EEO data and information in the hiring process and to review the agency hiring practices and implement new policies and procedures for diverse and inclusive recruitment. See Appendix F at pages 2-4, and 6.” The entity also provided a January 28, 2021, *EEO Quarterly Report and Dashboard* email, the *Key Responsibilities & Performance Requirements Form* for its principal EEO Professional, and a November 3, 2021, *Quarterly EEO* and November 5, 2021, *Weekly HR* Microsoft Teams Meeting invite for the principal EEO Professional and Director of Human Resources, respectively.

EEPC Response:

The EEPC recognizes the agency's commitment to implement Corrective Action #7. The *EEO Quarterly Report and Dashboard* email indicated that in 2021, CFB's Agency Head, interim principal EEO Professional and interim HR professional collaborated to draft the entity's EEO Quarterly Report. To demonstrate compliance, provide documentation that the principal EEO Professional, principal Human Resources professional (or designee), and Agency Head reviewed the entity's statistical information (e.g. workforce, hires, promotions, and separations by race/ethnicity and gender), as part of the entity's employment practices and policies to



identify whether there are barriers to equal employment opportunities and determine what, if any, actions are required to correct deficiencies (e.g. underutilization or adverse impact). Document the data reviewed, barriers identified (if any), and the entity's strategy to address each barrier. This review should be done annually. Implementation of this corrective action will be monitored during the assigned compliance-monitoring period.

**Corrective Action #9:**

Assess recruitment efforts by, at minimum, ensuring the following are completed and practiced: 1.) maintain a record of job advertisements and list of recruitment sources for each job group/title experiencing underutilization; 2.) review applicant demographics to identify the number of protected applicants yielded by each recruitment source; 3.) eliminate recruitment sources that do not yield a practical number of relevant qualified applicants; 4.) update the recruitment sources list to increase the effectiveness of targeted diversity recruitment initiatives by: engaging in activities such as identifying relevant professional and community organizations serving women, minorities, and other protected groups throughout the City, advertising in target-oriented media, participating in job fairs, and/or utilizing internships to attract interested and qualified persons in the target audiences; and 5.) utilize the updated recruitment sources list when positions become available or where the entity may otherwise use discretion in hiring. Document each step taken to assess recruitment efforts and address adverse impact.

**Agency Response:**

*"EHIRE has just been implemented at the CFB, and the agency is finalizing a new hiring process. The current hiring process includes an EEO interview log for every position that monitors the recruitment source used for the applicant. See Appendix E at page 44. The Agency's current hiring process guidance notifies hiring managers that the EEO Officer [(principal EEO Professional)] can assist the hiring manager to identify potential posting sites for diversity and inclusion purposes. See id. at page 49. Attached please find the job board request template which includes options for diversity hiring sites. See id. at page 55. As part of the agency's new hiring process, The Executive Director, Director of HR, and EEO Officer will meet quarterly to assess recruitment efforts and discuss any adverse impacts. We understand that the recruitment sources document is a living document, and we will add and eliminate recruiting sources as we see fit." The entity provided a copy of its Equal Employment Opportunity Interview Log and Job Board Package.*

**EEPC Response:**

The EEPC recognizes the agency's commitment to implement Corrective Action #9. To demonstrate compliance, provide documentation that the entity's principal EEO Professional and Director of HR assessed recruitment efforts by, at minimum, ensuring the following are completed and practiced: 1.) maintain a record of job advertisements and list of recruitment sources for each job group/title experiencing underutilization; 2.) review applicant demographics to identify the number of protected applicants yielded by each recruitment source; 3.) eliminate recruitment sources that do not yield a practical number of relevant qualified applicants; 4.) update the recruitment sources list to increase the effectiveness of targeted diversity recruitment initiatives by: engaging in activities such as identifying relevant professional and community organizations serving women, minorities, and other protected groups throughout the City, advertising in target-oriented media, participating in job fairs, and/or utilizing internships to attract interested and qualified persons in the target audiences; and 5.) utilize the updated recruitment sources list when positions become available or where the entity may otherwise use discretion in hiring. Document each step taken to assess recruitment efforts and address adverse impact. Implementation of this corrective action will be monitored during the assigned compliance-monitoring period.

**Corrective Action #10:**

Designate and ensure that an EEO or human resources professional (may be referred to as the Career Counselor) is trained to be knowledgeable and familiar with career opportunities in City government and provide career counseling to employees upon request. Document this professional's duties to advise employees of opportunities for promotion and career advancement. Remind employees of the identity/type of guidance available from the Career Counselor at least annually.

**Agency Response:**

*"Attached please find the CFB's updated EEO Policy as of August 24, 2022. See Appendix A at pages 3- 11). The new policy was emailed to all CFB staff on August 24, 2022. See Appendix A at pages 1-2. The policy includes the designation of [the Director of Human Resources] as the CFB's career counselor. See id. at page 11. Also attached are the key responsibilities of the agency's career counselor, [the Director of Human Resources], indicating that the career counselor provides individual counseling and coach [sic] to employees as needed. See Appendix H at page 2. The CFB's Career Counselor is always available to meet with staff about career development. Employees interested in a position can (and have) made appointments with the Career Counselor to discuss what positions might be well-suited for them and how to plan for overall professional growth. The CFB has a human resources-focused hub on its Intranet for all employees to have continuous access to career development and other related information, such as information about trainings and open civil service examinations. The HR Unit regularly emails all CFB staff with job opportunities in City government and information about Civil Service Exams. See Appendix H at pages 5-6. CFB employees are encouraged to attend trainings, acquire certifications, and take on new projects and/or responsibilities to further develop their skills, which increases their value to the agency, and may enable them to grow into other opportunities." The entity also provided its Key Responsibilities for its Director of Human Resources along with the following emails: August 20, 2020, DCAS Civil Service 101 Information Session and June 3, 2021 RE NYC IBO job vacancy.*

**EEPC Response:**

The EEPC recognizes the agency's commitment to implement Corrective Action #10. CFB's *Key Responsibilities* demonstrated that the entity's Director of Human Resources also served as the Career Counselor. In addition, emails from 2020 and 2021 indicated that the HR department was responsible for advising employees of opportunities for promotion and career advancement. To demonstrate compliance, provide documentation that demonstrates that employees were informed of the identity and type of guidance available from the Career Counselor. Implementation of this corrective action will be monitored during the assigned compliance-monitoring period.

**Corrective Action #11:**

Designate and ensure that the principal Human Resources professional (or designee) provides all employees with information regarding: job responsibilities, performance evaluation standards, civil service examinations, training opportunities, job postings, and Career Counseling (including the identity of the Career Counselor); and informs and involves the principal EEO Professional in efforts to employ, promote, or accommodate qualified individuals with disabilities.

**Agency Response:**

*"The CFB has a human resources-focused hub on its Intranet for all employees to have continuous access to career development and other related information, such as information about trainings and open civil service examinations. The HR Unit regularly emails all CFB staff with job opportunities in City government and information about Civil Service Exams. See Appendix H at pages 5-6. CFB employees are encouraged to attend trainings, acquire certifications, and take on new projects and/or responsibilities to further develop*

*their skills, which increases their value to the agency, and may enable them to grow into other opportunities. Additionally, please find attached the CFB's New Employee Onboarding checklist, which demonstrates that every new employee is instructed of performance evaluation standards See Appendix H at page 7." The entity also provided its New Hire Orientation Acknowledgement Form.*

EEPC Response:

The EEPC recognizes the agency's commitment to implement Corrective Action #11. To demonstrate compliance, provide documentation that demonstrates that the entity's Director of Human Resources (also the agency's Career Counselor) provided all employees with information regarding: job responsibilities, performance evaluation standards, civil service examinations, training opportunities, job postings, and Career Counseling (including the identity of the Career Counselor); and informs and involves the principal EEO Professional in efforts to employ, promote, or accommodate qualified individuals with disabilities. Implementation of this corrective action will be monitored during the assigned compliance-monitoring period.

Corrective Action #12:

Designate EEO or human resources professional(s) to annually assess the manner in which candidates are selected for employment in discretionary titles to determine whether there is any adverse impact upon a particular racial, ethnic, disability, or gender group by annually: 1.) identifying job groups experiencing underutilization and the (non-competitive class) job titles in those groups; 2.) assessing the selection procedures within each job group/relevant title to identify barriers that may exclude certain groups; 3.) assessing the relevancy of selection criteria for measuring job suitability; 4.) discontinuing use of criteria that are not job-related; and 5.) adopting selection methods that reduce adverse impact. Document each step the entity has taken to identify and address adverse impact in selection criteria and selection methods.

Agency Response:

*"The CFB's Executive Director, EEO Officer, and Director of HR meet at least annually to discuss recruitment efforts for discretionary titles to determine whether any particular group is adversely impacted. The current hiring process includes an EEO interview log for every position that monitors the recruitment source used for the applicant. See Appendix E at page 44. The Agency's current hiring process guidance notifies hiring managers that the EEO Officer can assist the hiring manager to identify potential posting sites for diversity and inclusion purposes. See id. at page 49. Attached please find the job board request template which includes options for diversity hiring sites. See id. At page 55." The entity provided a copy of its Equal Employment Opportunity Interview Log and Job Board Package.*

EEPC Response:

The EEPC recognizes the agency's commitment to implement Corrective Action #12. To demonstrate compliance, provide documentation that demonstrates that CFB's Agency Head, principal EEO Professional and Director of HR annually assess the manner in which candidates are selected for employment in discretionary titles to determine whether there is any adverse impact upon a particular racial, ethnic, disability, or gender group by annually: 1.) identifying job groups experiencing underutilization and the (non-competitive class) job titles in those groups; 2.) assessing the selection procedures within each job group/relevant title to identify barriers that may exclude certain groups; 3.) assessing the relevancy of selection criteria for measuring job suitability; 4.) discontinuing use of criteria that are not job-related; and 5.) adopting selection methods that reduce adverse impact. Document each step the entity has taken to identify and address adverse impact in selection criteria and selection methods. Implementation of this corrective action will be monitored during the assigned compliance-monitoring period.

**Corrective Action #13:**

Designate EEO or human resources professional(s) to annually assess the manner in which candidates are selected for employment in civil service (competitive) titles to determine whether there is any adverse impact upon a particular racial, ethnic, disability, or gender group by: 1.) identifying job groups experiencing underutilization and the competitive class job titles in those groups; 2.) reviewing the competencies, skills and abilities required (as presented in job vacancy notices and notices of examination) for available positions to ensure they are updated, job-related, and required by business necessity, including working with DCAS if applicable; and 3.) targeting efforts to inform and encourage entity employees to apply for upcoming civil service and promotional civil service examinations. Document each step the entity has taken to assess selection criteria and address adverse impact where identified.

**Agency Response:**

*“The CFB’s Executive Director, EEO Officer, and Director of HR meet at least annually to discuss recruitment efforts for competitive titles to determine whether any particular group is adversely impacted. The vast majority of positions at the CFB are discretionary. There are approximately 30 positions that use competitive titles, and they all are within the CFB’s technology and systems unit, and the agency strives to attract female and minority talent in these areas despite the challenges of a small talent pool. The current hiring process includes an EEO interview log for every competitive position that monitors the recruitment source used for the applicant. See Appendix E at page 44. The Agency’s current hiring process guidance notifies hiring managers that the EEO Officer can assist the hiring manager to identify potential posting sites for diversity and inclusion purposes. See id. at page 49. Attached please find the job board request template which includes options for diversity hiring sites. See id. at page 55.”* The entity provided a copy of its *Equal Employment Opportunity Interview Log and Job Board Package*.

**EEPC Response:**

The EEPC recognizes the agency's commitment to implement Corrective Action #13. To demonstrate compliance, provide documentation that demonstrates that CFB’s Agency Head, principal EEO Professional and Director of HR annually assess the manner in which candidates are selected for employment in civil service (competitive) titles to determine whether there is any adverse impact upon a particular racial, ethnic, disability, or gender group by: 1.) identifying job groups experiencing underutilization and the competitive class job titles in those groups; 2.) reviewing the competencies, skills and abilities required (as presented in job vacancy notices and notices of examination) for available positions to ensure they are updated, job-related, and required by business necessity, including working with DCAS if applicable; and 3.) targeting efforts to inform and encourage entity employees to apply for upcoming civil service and promotional civil service examinations. Document each step the entity has taken to assess selection criteria and address adverse impact where identified. Implementation of this corrective action will be monitored during the assigned compliance-monitoring period.

The EEPC thanks you and your staff for your continued cooperation.