

# CITY OF NEW YORK CONFLICTS OF INTEREST BOARD

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## **CONFLICTS OF INTEREST BOARD** **DIVERSITY AND EQUAL EMPLOYMENT OPPORTUNITY PLAN** **FISCAL YEAR 2020** **(JULY 2019 THROUGH JUNE 2020)**

### **I. Introductory, Commitment and Accountability Statement by the Agency Head**

As the ethics board for the City of New York, the New York City Conflicts of Interest Board (the “Board”) is dedicated to preserving the integrity of City government, both through the implementation and enforcement of the City’s conflicts of interest law and by promoting the principles of diversity, inclusion, and equal employment opportunity.

The Board is committed to providing equal employment opportunity to all individuals and preventing illegal discrimination by ensuring that employees and applicants are aware of their rights and obligations under the Citywide EEO Policy and the Board’s Diversity and EEO Program and Plan, by maintaining fair employment practices for all of its employees and applicants, and by encouraging a work environment that tolerates and appreciates differences among employees. All personnel should work together to maintain an atmosphere of appreciation for the diversity reflected in the Board’s staff. This policy statement ensures that Board employees, applicants, clients, customers, consultants, vendors, interns, and contracted employees are treated fairly by maintaining an environment that is consistent with federal, state, and local EEO laws.

**This statement is the same as last year.**

### **II. Recognition and Accomplishments**

In the past year our agency accomplished the following as part of our commitment to Equal Employment Opportunity, Diversity and Inclusion:

1. The Board has a 100% completion rate for the EEO Training.
2. The Board has a 100% completion rate for the Sexual Harassment Training.

3. Added several historically black colleges and universities to the list of law schools and colleges for posting job openings to expand the Board’s recruitment sources for diverse applicants.
4. Created and implemented a standard set of interview questions for applicants to facilitate structured interviewing.
5. Added recruitment source to the Interview Log to assess impact of recruitment efforts.

The agency recognizes employees, supervisors, managers, and agency units demonstrating superior accomplishment in diversity and equal employment opportunity through the following:

- Diversity & EEO Awards\*
- Diversity and EEO Appreciation Events\*
- Public Notices
- Positive Comments in Performance Appraisals
- Other: \_\_\_\_\_

*\*Please specify under “Additional Comments”*

- The agency will continue to recognize employees, supervisors, managers, and agency units demonstrating superior accomplishment in diversity and equal employment opportunity in FY 2020.

*Additional Comments:*

**III. Workforce Review and Analysis**

1. 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 2020, 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 ESS (by email annually)
- Agency's intranet site
- Newsletters
- On-boarding
- Manager/supervisor observation, if employee refuses to self-ID

*Additional Comments:* The EEO Officer sends an email to all Board employees annually to remind them that they can update their self-identification information through NYCAPS Employee Self Service (ESS). For employees who do not self-identify, the Administration will note an observed race/ethnicity and gender, understanding that DCAS is currently working on a way to record and store this data separately from an employee's selection documentation.

2. Describe the review process of the CEEDS workforce composition, utilization, 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 General Counsel work together to review demographic trends. These reports must be reviewed regularly with the Agency Head.

The agency conducts regular reviews of the dashboard sent to the EEO Officer by DCAS' Office of Citywide Equity and Inclusion (OCEI) 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.

Reviewed with	Frequency
Human Resources	<input type="checkbox"/> Quarterly <input type="checkbox"/> Semi-Annually <input checked="" type="checkbox"/> Annually <input type="checkbox"/> Other _____
General Counsel	<input type="checkbox"/> Quarterly <input type="checkbox"/> Semi-Annually <input checked="" type="checkbox"/> Annually <input type="checkbox"/> Other _____
Agency Head	<input type="checkbox"/> Quarterly <input type="checkbox"/> Semi-Annually <input checked="" type="checkbox"/> Annually <input type="checkbox"/> Other _____
Other (___specify)	<input type="checkbox"/> Quarterly <input type="checkbox"/> Semi-Annually <input type="checkbox"/> Annually <input type="checkbox"/> Other _____

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

- The agency reaches out to DCAS to serve as a resource in identifying strategies and best practices to address barriers to entry as well as to receive guidance concerning the interpretation of underutilization reports.

*Additional Comments:* According to the latest workforce report as of September 30, 2019, the Board does not have any job groups with statistically significant underutilization.

#### IV. EEO, Diversity, Inclusion, and Equity Initiatives for FY 2020

##### 1. Proactive Strategies to Enhance Diversity, EEO and Inclusion

**State below the central goals of your strategy for FY 2020 focused on enhancing diversity, equal employment opportunity, and the overall value of inclusion at your agency. Include initiatives that your agency will implement in FY 2020.**

- 1. Workforce:** The EEO Officer, Human Resources Director, General Counsel, and Agency Head will meet annually to review and discuss workforce composition data to assess demographic trends to be considered when making decisions about recruitment, hiring, promotions, and attrition.
- 2. Workplace:** The Board will continue to foster an environment of inclusion and will provide ongoing training to its employees.
- 3. Community:** To the extent feasible, the Board will utilize a minority-owned business to provide services at the workplace.

##### 2. Describe the new and continuing initiatives devoted to innovative enhancement and expansion of the three strategic pillars of Diversity and EEO strategy: **WORKFORCE**, **WORKPLACE**, and **COMMUNITY**.

###### A. **WORKFORCE:**

**NOTE:** Please address the specific recruitment, selection and promotion strategies, sources and procedures in Sections V and VI.

The agency will address underutilization in FY 2020 by:

- Enhancing internal and external applicant pools to address the underutilization.
- Using the quarterly workforce dashboard and identifying specific job groups where underutilization exists to guide recruitment efforts.

The agency will implement the following strategies to address the impending retirement of employees and possible loss or gap in talent:

- Job analysis and skills audit.
- Conduct workforce planning and forecasting.
  - Use the DCAS Retirement Predictor Tools to address the impending retirement of employees and possible loss or gap in talent.
  - Integrate succession planning in the agency activities to develop a pipeline, facilitate a seamless transition and continuity of service.
  - Ensure that there will be a diverse applicant pool for the anticipated vacancies.
  - Evaluate best sources for diverse candidates
  - Encourage agency employees to take promotional civil service examinations by:
    - Sending e-mails with schedule of exams
    - Providing link to specific DCAS exams
    - Posting schedules and exam announcements at the agency intranet
  - Other (specify): \_\_\_\_\_

The agency will implement the following initiatives to develop and retain employees:

- Institute coaching, mentoring and cross training programs.
- Identify best practices to retain mature employees.
- Implement initiatives to improve the development and training of employees.
- Promote employee involvement by supporting Employee Resource Groups
- Conduct Diversity and Inclusion Training

*Additional Initiatives, Programs, or Comments:*

**B. WORKPLACE:**

- The agency will take initiatives to create an inclusive work environment that values differences, and to maintain focus on retaining talent across all levels.
- In FY 2019, the agency conducted the following survey(s) to improve the recruitment, hiring, inclusion, retention and advancement of people in underrepresented groups:
  - Engagement /Job Satisfaction/ Employee Morale Survey(s)
  - Citywide Onboarding survey
  - Citywide Exit Survey for Non-Represented Employees
  - Exit interview or surveys developed by the agency
- The agency will adopt in FY 2020 the following initiatives based on the analysis of the results of the survey(s):
  - 1.
  - 2.

*Additional Initiatives, Programs, or Comments:*

**C. COMMUNITY:**

In FY 2020, 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.

- Identify best practices for establishing a brand of inclusive customer service.
- Undertake initiatives to improve community relations, community awareness, and to engage communities being served in recruitment efforts, service development and delivery.

*Additional Initiatives, Programs or Comments:* The work of the Board does not require it to engage directly with members of the public; the Board’s “customers” are other City employees.

**V. Recruitment**

**A. Recruitment Efforts**

1. Summary of Recruitment Efforts – Include steps that will be taken to give notice to all employees of discretionary job postings within the agency as well as proactive efforts/strategies planned to market positions externally.

The agency will implement the following recruitment strategies and initiatives in FY 2020:

- Review policies, procedures, and practices related to targeted outreach and recruitment.
- Review underutilization in job groups to inform recruitment efforts.
- Direct resources to bolster efforts aimed at increasing the effectiveness of diversity recruitment.
- Put in place an operating, up-to-date, accessible website, mobile application and social media presence related to careers.  Currently in operation.
- Assess agency job postings to ensure appropriate diversity, inclusion, and equal opportunity employer messaging.
- Share job vacancy notices with the Mayor’s Office for People with Disabilities at [nycatwork@mopd.nyc.gov](mailto:nycatwork@mopd.nyc.gov), (212) 788-2830 and ACCES VR by sending the job vacancy notices to Maureen Anderson at [Maureen.Anderson@nysed.gov](mailto:Maureen.Anderson@nysed.gov), (212) 630-2329 so they can share it with their clients.
- Reach out to the DCAS Office of Citywide Recruitment (OCR) as a resource at [citywiderecruitment@dcas.nyc.gov](mailto:citywiderecruitment@dcas.nyc.gov).
- If your agency is an eHire agency, post ALL vacancies on NYC Careers.
- Ensure that agency personnel involved in both the discretionary and the civil service hiring process have received:
  - structured interviewing training
  - unconscious bias training

- Use the NYCAPS eHire Applicant Interview Log to determine whether recruitment efforts and recruitment sources yield a diverse pool of qualified candidates.
- Assess recruitment efforts to determine whether such efforts adversely impact any particular group.

*Additional Strategies, Initiatives and Comments:* Because the Board is a very small agency, current employees know almost immediately when a position becomes available. To market positions externally, the Board posts all job openings on NYC Careers and on the Board’s website (<https://www1.nyc.gov/site/coib/about/careers.page>). The Board also promotes open positions on its social media platforms (@NYCCOIB) and by posting with various recruitment sources (see below).

A few of the Board’s employees have completed the Structured Interview Training provided by DCAS and found that the training was not helpful to the Board’s recruitment and hiring efforts. Given the small size of the agency, almost all agency personnel could be involved at some point in the hiring process, and it would be burdensome to have all staff members complete the over three-hour DCAS training. Instead, the Board will draw on the key principles of the Structured Interview Training to develop an appropriate interview process that is more tailored to the staffing needs of the Board and meets these recruitment and staffing goals.

The Board does not use the NYCAPS eHire Applicant Interview Log; the Board utilizes its own Interview Log to track recruitment sources.

Diverse Recruitment Source(s)	What sort of return do you expect to see from the effort? Indicate if this source yielded increased and diverse applicant pool. Were there successful hires from this source?
1. Indeed	1. Goal is to reach a larger pool of potential candidates to increase diversity of the applicants. <input checked="" type="checkbox"/> Previous hires from this source
2. Idealist	2. Goal is to reach a larger pool of potential candidates to increase diversity of the applicants. <input checked="" type="checkbox"/> Previous hires from this source
3. List of colleges and law schools	3. Goal is to reach a larger pool of potential candidates to increase diversity of the applicants. <input checked="" type="checkbox"/> Previous hires from this source



<p>4. New York City Bar Association</p> <p>5.</p>	<p>4. Goal is to reach a larger pool of potential candidates to increase diversity of the applicants.</p> <p><input type="checkbox"/> Previous hires from this source</p> <p>5.</p> <p><input type="checkbox"/> Previous hires from this source</p>
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**B. Internships/Fellowships**

Indicate the type of internship/fellowship opportunities available at your agency. Please provide the number of student interns/fellows employed in FY 2019 and their demographic profiles. Indicate your plans to provide internship/fellowship opportunities in FY 2020.

The agency provided the following internship opportunities in FY 2019:

Type of Internship\Fellowship	Total	Race/Ethnicity *[#s] * Use self-ID data	Gender * [#s] * Use self-ID data
1. Urban Fellows			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 (specify):			M __ F__ Non-Binary __ Other __ Unknown __

\* Self-ID data is obtained by EEO Office from NYCAPS.

The agency will utilize the internship/fellowship programs to improve a pipeline of candidates from underutilized groups for entry-level positions, including in mission-critical occupations.

The agency has hired former interns/fellows.

The agency plans to provide internship/fellowship opportunities in FY 2020.

*Additional Comments:* The Board lacks the physical space for an intern to work.

**C. 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 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.

1. Please discuss plans to utilize the 55-a Program to hire and retain qualified individuals with disabilities.

The Board is a small agency and does not currently have any open Civil Service positions. If such a position becomes vacant, the Board will consider utilizing the 55-a program and will reach out to DCAS for resources.

2. Indicate the goals of your 55-a Program Coordinator for FY 2020. Also include your agency plans to do the following: participate in career and job fairs; use internship, work-study, co-op, and other programs to attract a pool of diverse 55-a program applicants; and promote and encourage 55-a program participants to take civil service examinations.

The agency uses the 55-a Program to hire and retain qualified individuals with disabilities and plans to utilize the 55-a Program to hire and retain qualified individuals with disabilities in FY 2020.

Currently, there are   0   [number] 55-a participants.

There are   0   [number] participants who have been in the program less than 2 years.

Last year, a total of   0   [number] new applications for the program were received

and   n/a   participants left the program due to [state reasons]   n/a  .

If there have been no new participants in the program for less than two years, please indicate initiatives taken to hire new 55-a employees.

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The agency will review and process new applications for the 55-a program in light of DCAS' policy guidance which states that decisions on 55-a program admissions should take into account the following three criteria:

- a) the severity of the candidate's physical and/or mental disability;

- b) the candidate’s previous and/or current encounter with significant barriers to finding employment due to the disability;
- c) the candidate’s encounter of obstacles that can prevent him/her from taking civil service examinations due to the disability.

Based on the June 7, 2016, 55-a memorandum, issued by DCAS, the agency will carefully evaluate each request by longtime provisional employees for designation under § 55-a to serve non-competitively in a competitive title position to ensure that the request is not made solely to avoid the consequences of CSL § 65(3). In addition, the agency will reiterate to provisional staff that 55-a certification should not be used as a substitute for passing a civil service exam. The agency will encourage 55-a participants to take civil service examinations.

The agency plans to participate in career and job fairs and use internship, work-study, co-op, and other programs to attract a pool of diverse 55-a program applicants.

The goals of the 55-a Coordinator for FY 2020 are:

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

These goals are the same as last year.

*Additional Goals, Initiatives, and Comments:* The Board is a small agency with very few competitive civil service positions. There has not been an open competitive civil service position at this agency for many years. If a competitive civil service position becomes available, the Board will ensure that the job posting includes the suggested 55-a Program language and share the job posting with the Citywide 55-a Coordinator for wider distribution.

**VI. Selection (Hiring and Promotion)**

1. For FY 2020, if your agency is fiscally able to hire new employees and/or backfill open positions, please discuss the planned duties for your career counselor specific to advising employees of opportunities for promotion as well as overall career development.

In FY 2020, the agency’s Career Counselor will perform the following tasks:

- Review policies, procedures, and practices related to hiring (including vacancy announcements, use of certification lists, and the selection process for mission critical occupations).
- Promote employee awareness of opportunities for promotion and transfer within the agency.
- Inform employees on promotional and transfer opportunities.
- Arrange agency wide notification of promotional and transfer opportunities.
- Encourage the use of training and development programs to improve skills, performance and career opportunities.
  - Provide information to staff on both internal and external Professional Development training sources.
  - Explain the civil service process to staff and what it means to become a permanent civil servant.
  - Provide technical assistance in filing for upcoming civil service exams.
- Provide agency staff with citywide vacancy announcements, civil service exams notices and other career development information.
- Continue to facilitate the use of training to improve skills and access to career opportunities of all employees in its Leadership Program and via referrals to DCAS.
- Assist employees and Job Training Program participants (if applicable) assess and develop career paths.
- Provide resources and support for:
  - Targeted job searches
  - Development job search strategies
  - Resume preparation
  - Review of effective interview techniques
  - Review of techniques to promote career growth and deal with change
  - Internship exploration

*Additional Initiatives and Comments:*

2. What are your current new hire and promotional procedures for selection, especially for mid- and high-level discretionary positions?

In FY 2020, the agency will do the following:

- Review and develop a protocol for in-title promotions and salary increases.
- Promote employee awareness of opportunities for promotion and transfer within the agency.
- Assess the criteria for selecting persons for mid-level to high level positions.
- Publicly post announcements for all positions, including senior level positions.
- Actively reach out to networks of underrepresented groups as part of its outreach.
- Reach out to the Mayor's Office of Appointments for help to identify diverse pools of talent and additional networks for finding qualified candidates.
- Ensure that hiring managers are trained in structured interviewing techniques to avoid unintentional biases in the hiring process.
- Assess the manner in which candidates are selected for employment, to determine whether there is any adverse impact upon any particular racial, ethnic, disability, or gender group.
- If adverse impact is discovered, the agency head will determine whether the criteria being utilized are job-related. If the criteria are not job-related, the agency will discontinue using that method.
- Compare the demographics of current employees to the placements.
- Revise the promotion request form to include the various reasons why a promotion may be necessary.
- Review the demographics race\ethnicity and gender for those who received the promotion\salary raises.
- Submit the resumes for the second- and third-choices for the position.

- Review the demographics of the senior leadership regularly (by Agency Head).
- Review on a quarterly basis the demographics of those who received promotion and share the information with the Commissioner and Human Resources (by EEO Officer).

*Additional Comments:* The Board is a small agency with a limited number of mid- and high-level positions, which only become available when a senior staff member leaves his or her position. The Board also operates on a very small budget, and, as a result, there are effectively no funds for salary increases. Thus, promotions are not very prevalent at the Board. If a senior level position becomes available, the Board will apply appropriate procedures to promote equal employment opportunities.

3. For FY 2020, indicate how your agency will review the methods by which candidates are selected for new hiring and promotion. Identify the steps that are taken to ensure that selection process is objective and job related. For instance, have you explored/implemented structured interviewing and/or training, panel interviews, etc.?

During FY 2020, the agency will do the following:

- Review policies, procedures, and practices related to hiring (including vacancy announcements, use of certification lists, and the selection process for mission critical occupations) for possible barriers that have a negative impact on minority employees and applicants.
- Use a collaborative effort between EEO, HR and managers where necessary, develop action plans to eliminate identified barriers.
- Develop specific, job-related qualification standards for each position that reflect the duties, functions, and competencies of the position and minimize the potential for gender stereotyping and other unlawful discrimination. Make sure these standards are consistently applied when choosing among candidates.
- Establish written objective criteria for evaluating candidates for hire or promotion and applying those criteria consistently to all candidates.
- In conducting job interviews, ensure nondiscriminatory treatment by conducting a structured interview, where the same questions are asked of all applicants for a particular job or category of job and inquiring about matters directly related to the position in question.
- Use a diverse panel of interviewers to conduct the interview.

- Have the EEO Officer review the interview questions.
- Have the EEO Officer observe interviews, where possible.
- Use the NYCAPS eHire applicant tracking system for external and internal applicants.
- Make adjustments to agency outreach and recruitment efforts where necessary.
- Monitor the results of action plans for any changes in the agency workforce including increases or decreases in applications of qualified applicants and selection rates.

*Additional Comments:* The Board is a small agency of 26 employees who work in six operational units, ranging in size from one person to six people. For those units with more than one person, each unit has some diversity, whether by race, gender, ethnicity, age, or a combination thereof. A candidate for an open position at the Board will generally be interviewed, at some point during the interview process, by all members of the unit in which he or she would work.

4. For FY 2020, what steps will your agency take to review the positions filled through a civil service list?

- A. Detail planned actions specific to review of title specification, job description, interview procedures, and selection procedures.
  - Reach out to DCAS' Classification at 212-386-0344 to ensure that the job description and specification is current.
  - Review and develop specific, job-related qualification standards for each position that reflect the duties, functions, and competencies of the position and minimize the potential for gender stereotyping and other unlawful discrimination.
  - Use structured interview, where the same questions are asked of all applicants for a particular job or category of job and inquiring about matters directly related to the position in question.
- B. Discuss your current protocol for use of the NYCAPS Applicant Interview Log reports to identify applicants by gender and race/ethnicity.
  - The agency does not use the NYCAPS Applicant Interview Log Report.
  - The agency will schedule orientation with NYCAPS Central.

The agency will use the Applicant Interview Log Report to track applicant sources and identify the best sources of applicants.

C. Discuss all planned steps taken to identify barriers to entry for positions and actions under consideration to address such barriers.

Identify at least two or three people from diverse gender and racial\ethnic backgrounds to review received applications and conduct the interviews.

D. When identifying groups of subject matter experts to assist the DCAS test development team, please describe efforts that will be taken to select a diverse and inclusive group of individuals.

The agency will identify a diverse group of subject matter experts (e.g. race, gender, age, assignments location, etc.) when requested by DCAS.

The agency will use objective job-related criteria to identify the subject matter experts who will participate in test development.

The agency will make an effort to ensure different staff members are given the opportunity to participate in test development.

*Additional Comments:* The Board does not use the NYCAPS Applicant Interview Log Report; it utilizes its own Interview Log to record the perceived gender and race/ethnicity of candidates. As mentioned above, candidates for an open position at the Board are generally interviewed by the employees of the unit in which they would work. The Board uses a standard set of interview questions for applicants.

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

In FY 2020, the agency EEO Officer will do the following:

**PRE-SELECTION:**

Collaborate with the Director of Human Resources to ensure that an updated listing of sources for diverse applicants, including schools and professional organizations, is maintained.

Actively monitor agency job postings.

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.



- Provide feedback to the hiring manager after the EEO Officer’s assessment.
- Assist the hiring manager if a reasonable accommodation is requested during the interview.
- May observe interviews when necessary, especially for underutilized job titles and/or mid- and high-level discretionary positions.
- Other: \_\_\_\_\_

**POST-SELECTION:**

- 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.
- Review hiring package for review and approval.
- Other: \_\_\_\_\_

*Additional Comments:* Given the small size of the Board and its very limited budget, the Board does not have a dedicated hiring manager. The Board has added several historically black colleges and universities to the list of law schools and colleges for posting job openings to expand its recruitment sources for diverse applicants.

6. 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 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 2020.
- The agency will analyze the impact of layoffs or terminations on racial, gender and age groups.
- 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**

Training Topic	Type of Audience (e.g. Front-Line Staff, Managers, Supervisors, etc.)	Target Number of Participants	Targeted Dates
1. EEO Awareness (e-learning)	All employees (every 2 years alternating with Everybody Matters)	0 this FY	By June 30, 2022
2. EEO Awareness (classroom)			
3. Everybody Matters (D&I) (classroom)			
4. Everybody Matters (D&I) (e-learning)	All employees (every 2 years alternating with EEO Awareness)	26	By June 30, 2020
5. Sexual Harassment Prevention (e-learning)	All employees (every year – new training cycle began 9/3/19)	26	By October 3, 2019
6. Sexual Harassment Prevention (classroom)			
7. Disability Etiquette			
8. Structured Interviewing and Unconscious Bias (classroom)			
9. 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.

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.

- 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 grants or denies request 30 days after submission or as soon as possible.
- The agency head or designee<sup>1</sup> must review and grant or deny the appeal fifteen (15) days after submission of appeal. If NOT the agency head, please provide the name and title of the designee: \_\_\_\_\_
- The agency follows the City’s Reasonable Accommodation Procedure.
- The agency will input the Reasonable Accommodation activity on the DCAS Citywide Complaint and Reasonable Accommodation Tracking System and update the information as they occur.
- The agency analyzes the reasonable accommodation data made at the agency.

Describe procedures and speed of resolution, including the protocol for deciding appeals of Reasonable Accommodation decisions. Does the agency analyze statistics with regard to volume, trends, and speed of disposition of EEO complaints and reasonable accommodation requests and appeals?

The Board maintains an Excel spreadsheet to track reasonable accommodation requests and appeals. The Board is revising its FY 2020 EEO Plan to update its reasonable accommodation procedures. A summary of the anticipated procedures is as follows:

- (1) If a manager/supervisor notices that an individual may require an accommodation or receives a request from an individual for a reasonable accommodation, the manager/supervisor will refer the request to the EEO Officer as soon as possible.
- (2) Within 10 business days of receiving a request for a reasonable accommodation or noticing that an individual may require an accommodation, the EEO Officer will begin to engage in a cooperative dialogue with the requestor.

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<sup>1</sup> EEO Officer and General Counsel should **NOT** be appointed as agency head designee. Note conflict of interest, i.e., that in the case of an external challenge to the denial of a reasonable accommodation, the agency’s GC would be tasked with defending the agency against a decision in which that office was a decision maker on appeal. Refer to the revised Guidelines indicating that neither the EEO Officer nor GC may serve as the agency head’s designee found at: <http://extranet.dcas.nycnet/eo/diversityeeo/media/19647/reasonable-accommodation-procedural-guidelines-lc-12116.pdf> (p17).

- (3) Within 30 calendar days of beginning a cooperative dialogue, the EEO Officer will grant or deny the request and communicate the decision to the requestor in writing.
- (4) A requestor may appeal the denial of an accommodation to the Executive Director within 30 calendar days of receiving the decision.
- (5) Within 15 business days of receipt of the appeal, the Executive Director will issue a written determination on the appeal.

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

**A. 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, the training must be provided to all newly hired supervisory and managerial employees and line staff whose work tasks involve contact with the public.

- The agency plans to train all new employees within 30 days of start date.
- All the front-line supervisors, managers and employees were re-trained during FY 2019.
- All managers\supervisors will be re-trained by March 7, 2021.
- All front-line employees will be re-trained by March 7, 2021.

Training Topic	Type of Audience	Target Number of Participants	Targeted Dates
lgbTq – Power of Inclusion (classroom)	Supervisors		
	Front Line Staff		
lgbTq – Power of Inclusion (e-learning)	Supervisors	9	3/7/2021
	Front Line Staff	17	3/7/2021

- 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.

*Additional Comments:*

**B. Executive Order 21 (2016): Prohibition on Inquiry regarding Job Applicant’s Pay History**

- The agency has reviewed its practices (including application and interview forms) with regards to prohibition on inquiry regarding pay history.
- All personnel involved in job interviews will be required to go through Structured Interviewing and Unconscious Bias Training.

*Additional Comments:* The Board prohibits its employees from asking candidates about their pay history. See Section V.A.1 above for the Board’s comments concerning Structured Interview Training.

**C. 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. Current employees will be trained annually.

Training Topic	Type of Audience	Target # of participants	Targeted Dates
1. Sexual Harassment Prevention (classroom)			
2. Sexual Harassment Prevention (e-learning)	All employees	26	Completed as of 10/3/2019

*Additional Comments:*

**D. Local Law 93 (2018): Risk Assessment Survey & Initiatives to reduce/minimize risk of sexual harassment.**

Please provide a summary of agency initiatives to address the risk of sexual harassment and devise responsive strategies to minimize such risk. Please refer to the risk assessment survey conducted in 2018 and indicate if the initiatives were completed or are continuing.

	Initiative(s)	Who is Responsible for implementing the initiative(s)?	Timeframe\Timeline

<b>Risk 1 Homogenous Workplace</b>	Regular education about sexual harassment	EEO Officer	Ongoing <input checked="" type="checkbox"/> Completed <input type="checkbox"/>
<b>Risk 2 Cultural and Language Differences in the workplace</b>	Ongoing training and awareness	EEO Officer	Ongoing <input checked="" type="checkbox"/> Completed <input type="checkbox"/>
<b>Risk 3 Workplaces with Significant Power Disparities</b>	Regular meetings to discuss the Board's work	Agency Head & General Counsel	Ongoing <input checked="" type="checkbox"/> Completed <input type="checkbox"/>
<b>Risk 4 Isolated Workplaces</b>	N/A (all 26 Board employees work in the same physical workplace)	N/A	Ongoing <input type="checkbox"/> Completed <input type="checkbox"/>
<b>Risk 5 Decentralized Workplaces</b>	N/A (all 26 Board employees work in the same physical workplace)	N/A	Ongoing <input type="checkbox"/> Completed <input type="checkbox"/>
<b>Other Findings</b>			Ongoing <input type="checkbox"/> Completed <input type="checkbox"/>

**E. Local Law 97 (2018): Annual Sexual Harassment Reporting**

<p><input checked="" type="checkbox"/> The agency will input sexual harassment complaint data on the DCAS Citywide Complaint Tracking System, contemporaneously update the information, and affirm the data in a timely manner when requested by DCAS.</p> <p><input checked="" type="checkbox"/> The agency will input <b>all types of complaints</b> in the complaint data on the DCAS Citywide Complaint Tracking System, contemporaneously update the information, and affirm the data in a timely manner when requested by DCAS.</p> <p><input checked="" type="checkbox"/> The agency will ensure that complaints are closed within 90 days.</p>
<i>Additional Comments:</i>

**F. Local Law 101 (2018): Climate Survey**

Describe how additional insights gained from the analysis of the citywide Climate Survey will influence your agency workforce/workplace/community initiatives.

The agency, in collaboration with DCAS, has conducted a climate survey and:

- analyzed results of the response data sent by DCAS.
  
- implemented the following initiatives to address concerns raised in the Climate Survey:  
  

The Board is revising its FY 2020 EEO Plan to streamline and standardize the EEO complaint process in accordance with DCAS Office of Equity and Inclusion best practices. When the revised EEO Plan is circulated by email, the EEO Officer will remind all employees of the EEO complaint process to increase employee familiarity.
  
- The agency will provide a report to DCAS on the above initiatives by January 31, 2020.  
[NOTE: DCAS is mandated to submit a report on Action Plan to the Mayor and the Speaker of the Council].

*Additional Comments:*

**X. Audits and Corrective Measures:**

Please choose the statement that applies to your agency.

- The agency is NOT involved in an audit conducted by NYC EEPC or another governmental agency specific to our EEO practices.
  
- The agency is currently being audited or preparing responses to an audit conducted by the EEPC or [ \_\_\_\_\_ **another governmental agency – please specify** ] specific to our EEO practices. Upon forwarding our responses to the recommendations issued by the EEPC, the agency will submit to OCEI an amendment letter, which shall amend the agency plan for FY 2020 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 \_\_\_\_\_].  
Attach a copy of the document setting out the oversight parameters and the agency’s most recent report to the oversight agency.
  
- The agency was involved in an audit conducted by the EEPC specific to our EEO practices. This agency will continue/be required to implement measures during the year that this plan is in effect (please attach a copy of the audit findings.)

**NOTE: Final Agency Head’s signature and date should be set only after you receive DCAS’ approval of the plan.**

Carolyn Lisa Miller

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



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

July 13, 2020

\_\_\_\_\_  
Date



**APPENDIX**  
Contact Information

Please provide contact information (name, title, office address, telephone number and e-mail address) for the following individuals at your agency:

1. Agency EEO Officer  
Katherine J. Miller  
Assistant Counsel  
2 Lafayette Street, Suite 1010  
New York, New York 10007  
Tel: 212-437-0741  
[kmiller@coib.nyc.gov](mailto:kmiller@coib.nyc.gov)
2. Agency Chief Diversity & Inclusion Officer [if designated] – N/A
3. ADA Coordinator – Katherine J. Miller
4. Disability Rights Coordinator  
Varuni Bhagwant  
Director of Administration  
2 Lafayette Street, Suite 1010  
New York, New York 10007  
Tel: (212) 437-0750  
[bhagwant@coib.nyc.gov](mailto:bhagwant@coib.nyc.gov)
5. Disability Services Facilitator – Varuni Bhagwant
6. 55-a Coordinator– Varuni Bhagwant
7. Career Counselor(s) – Varuni Bhagwant
8. Training Liaison(s) – Varuni Bhagwant



Sasha Neha Ahuja  
Chair

Angela Cabrera  
Malini Cadambi Daniel  
Elaine S. Reiss, Esq.  
Arva R. Rice  
Commissioners

Charise L. Terry  
Executive Director

Judith Garcia Quiñonez, Esq.  
Executive Agency Counsel/  
Director of Learning and  
Development

Jennifer Shaw, Esq.  
Executive Agency Counsel/  
Director of Compliance

253 Broadway  
Suite 602  
New York, NY 10007

212. 615. 8939 tel.  
212. 676.2724 fax

## BY MAIL AND EMAIL

August 15, 2019

Carolyn Miller  
Executive Director  
Conflicts of Interest Board  
2 Lafayette Street, Suite 1010  
New York, NY 10007

Re: Resolution #2019AP/233-312-(2019)  
Conflicts of Interest Board  
Evaluation of Sexual Harassment Prevention and Response Practices  
Audit Period: January 1, 2017 to December 31, 2018  
Determination: **FINAL**

Dear Executive Director Miller:

On behalf of the members of the Equal Employment Practices Commission (EEPC), thank you 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: July 29, 2019  
Response Received: August 9, 2019

### Purpose

Chapter 35, Sections 815(a)(15) and (19) of the New York City Charter (Charter) calls for agency heads to ensure and promote equal opportunity for all persons in appointment, payment of wages, development, and advancement, and to establish measures and programs to ensure a fair and effective affirmative employment plan to provide equal employment opportunity (EEO) for minority group members and women.

Charter Chapter 36, Sections 830(a) and 831(d)(2) and (5) authorize the EEPC to audit, review, evaluate, and monitor the employment practices, procedures, and programs of city agencies and other municipal entities, hereinafter "entities," and their efforts to ensure fair and effective EEO for women and minority employees and applicants. Charter Sections 831(d)(2) and 832(c) authorize the EEPC to make a determination that any plan, program, procedure, approach, measure, or standard does not provide equal employment opportunity, require appropriate corrective action, and monitor the implementation of the corrective action prescribed. The

attachment contains the EEPC's final determination regarding the audit, review, and evaluation of the Conflicts of Interest Board's Sexual Harassment Prevention and Response Practices.

As the Conflicts of Interest Board falls within the EEPC's purview under Charter Chapter 36, Section 831(a), the EEPC is authorized to review, evaluate, and monitor the coordination and implementation of its affirmative employment programs of EEO and related practices. As indicated in our Preliminary Determination, the EEPC has adopted uniform standards<sup>1</sup> to this end. The purpose of this Final Determination, as authorized by Charter Chapter 36, Section 832(c), is to determine the sufficiency of the Conflicts of Interest Board's actions taken or planned thus far to correct areas of non-compliance identified in the EEPC's Preliminary Determination. Further, Chapter 36, Section 832(c) requires that: (1) the EEPC assign a compliance-monitoring period of up to six (6) months to monitor efforts taken to eliminate areas of non-compliance, if any; and (2) the agency respond in thirty (30) days and submit a report each month during this period on the progress of efforts taken to correct outstanding areas of non-compliance.

### **Next Steps**

**The assigned compliance-monitoring period is: September 1, 2019 to February 29, 2020. Correcting all outstanding areas of non-compliance without delay is highly encouraged and will serve to shorten this period.**

***If corrective actions remain:*** Corrective actions will be listed under the *Monitoring Required* section of the attached Final Determination. The EEPC requires that the agency head submit a signed response to this Final Determination. The signed response should indicate what steps the Conflicts of Interest Board has taken, or will take, to correct outstanding areas of non-compliance during the designated compliance-monitoring period. The Conflicts of Interest Board will be monitored monthly until all outstanding areas of non-compliance have been sufficiently corrected. The Conflicts of Interest Board is required to submit documentation that supports the implementation of each corrective action via TeamCentral, the EEPC's Automated Compliance-Monitoring System. Instruction on how to access and navigate TeamCentral is attached.

***Final Memorandum:*** Upon the Conflicts of Interest Board's implementation of the final corrective action, if any, the EEPC requires that the Conflicts of Interest Board submit a final memorandum, signed by the agency head, that recognizes the EEPC's audit and reiterates commitment to equal employment practices. **Upon receipt of this final memorandum, the EEPC will issue a *Determination of Compliance*.**

***If no corrective actions remain:*** In lieu of a response to this Final Determination, the Conflicts of Interest Board must submit a final memorandum (See Next Steps, Final Memorandum). Upon the EEPC's receipt of the final memorandum, the Conflicts of Interest Board will be exempt from the abovementioned compliance-monitoring period.

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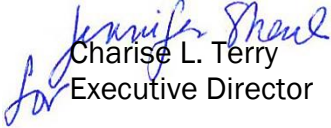
<sup>1</sup> The EEPC's uniform standards for auditing municipal entities and minimum standards for auditing community boards (collectively "Standards") are founded upon, and consistent with, federal, state, and local laws and regulations, and policies and procedures, including, but not limited to, the City of New York's *Equal Employment Opportunity Policy, Standards and Procedures to be Utilized by City Agencies 2014*; New York City Human Rights Law (NYC Administrative Code 8); New York State Human Rights Law (New York Executive Law, Article 15); New York State Civil Service Law §55-a; and the equal employment opportunity requirements of the New York City Charter.

**Conclusion**

This is the EEPc's Final Determination. Questions regarding next steps may be addressed to Jennifer Shaw, Esq., Executive Agency Counsel/Director of Compliance at [jshaw@eepc.nyc.gov](mailto:jshaw@eepc.nyc.gov) or 212-615-8942.

Thank you and your staff for your continued cooperation.

Sincerely,

  
Charise L. Terry  
Executive Director

c: Katherine Miller, Principal EEO Professional

Enclosed: TeamCentral Agency Manual

**FINAL DETERMINATION**

A response indicating progress of Conflicts of Interest Board's efforts to correct outstanding areas of non-compliance, with supporting documentation, is due within 30 days.

The Equal Employment Practices Commission's findings and corrective actions required to remedy areas of non-compliance are based on the audit methodology, which included collection and analysis of the documents, records, and data provided; the EEPC's *Preliminary Interview Questionnaires* (PIQs) for EEO professionals and others involved in EEO program administration; and, if applicable, the *EEPC Employee Survey*; the *EEPC Supervisor/Manager Survey*; the *Annual EEO Plans* and *Quarterly EEO Reports* of the audited entity; and workforce data from the *Citywide Equal Employment Database System*. Additional research and follow-up discussions or interviews were conducted as appropriate.

After reviewing the optional response<sup>2</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:**

Issue a Policy Statement or memorandum reiterating commitment to the prevention of sexual harassment annually.

**Agency Response:**

*"Steps taken: The Board updated its annual Equal Employment Opportunity ("EEO") Policy Statement to reiterate its commitment to the prevention of sexual harassment. On August 7, 2019, the principal EEO Professional/Associate Counsel emailed the updated EEO Policy Statement, which was issued by the agency head, to all agency employees. Attached is a copy of the distribution email and updated EEO Policy Statement."*

**EEPC Response:**

The EEPC recognizes the agency's commitment to implement corrective action #1. The EEPC accepts the agency's response and documentation provided as confirmation that corrective action #1 has been implemented.

**Corrective Action #6:**

Submit to the EEPC an Annual Plan of measures and programs to provide equal employment opportunity and quarterly reports on efforts to implement the Plan within 30 days following each quarter. Include a breakout of sexual harassment complaint activity in each quarterly report.

**Agency Response:**

*"Steps taken: As of FY 2019, the Board submits an annual plan of measures and programs, titled Diversity and Equal Employment Opportunity Plan, a copy of which was provided to the EEPC. As a non-mayoral agency, the Board was not required to submit this plan prior to FY 2019. The Board also submits Agency Quarterly Diversity and EEO Reports. Attached are copies of an updated report for the first and second quarters of FY 2019 and reports for the third and fourth quarters of FY 2019."*

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<sup>2</sup> Excerpts are italicized.

EEPC Response:

The EEPC recognizes the agency's commitment to implement corrective action #6. The EEPC accepts the agency's response and documentation provided as confirmation that corrective action #6 has been implemented. Once finalized, submit to the EEPC the agency's *Diversity and Equal Employment Opportunity Plan* for fiscal year 2020, and annually thereafter.

**Monitoring Required**

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

**Corrective Action #2:**

Distribute/Post a paper or electronic copy of the Equal Employment Opportunity Policy, Standards and Procedures to Be Utilized by City Agencies – or an agency Policy that conforms to city, state and federal laws against sexual harassment-- for use by managers, supervisors, and legal, human resources and EEO professionals. Include, or attach as addenda: uniform and responsive procedures for investigating discrimination/sexual harassment complaints, and current contact information for the agency's EEO professionals as well as federal, state and local agencies that enforce laws against discrimination/sexual harassment.

Agency Response:

*"Steps taken: The Board updated its EEO Policy to include the current contact information for the agency's EEO professionals as well as federal, state, and local agencies that enforce laws against discrimination/sexual harassment. On August 7, 2019, the principal EEO Professional/Associate Counsel posted and emailed the updated EEO policy, which was issued by the agency head, to all agency employees. Attached is a copy of the distribution email and updated EEO Policy."*

*Steps to be taken: The Board is planning to update its EEO Policy for 2020 to include uniform and responsive procedures for investigating discrimination/sexual harassment complaints."*

EEPC Response:

The EEPC recognizes the agency's commitment to implement corrective action #2. Upon completion, provide the EEPC with the agency's EEO Policy for 2020, which includes uniform and responsive procedures for investigating discrimination/sexual harassment complaints, and documentation of the updated policy's distribution.

**Corrective Action #3:**

Where the agency'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:

*"Steps to be taken: The Board will ensure that EEO professionals are trained in their responsibilities identified in the EEO Policy."*

EEPC Response:

The EEPC recognizes the agency's commitment to implement corrective action #3. The EEPC will monitor



the agency to ensure the EEO Counselors' completion of EEO trainings in EEO laws and procedures, and their responsibilities under the EEO Policy.

**Corrective Action #4:**

Maintain documentation regarding directives or decisions between the agency head (or a direct report other than the General Counsel) and the principal EEO Professional that impact the administration and operation of programs, policies or procedures concerning sexual harassment.

**Agency Response:**

*"Steps taken: The Board maintains documentation regarding directives or decisions between the agency head and the principal EEO Professional that impact the administration and operation of programs, policies or procedures concerning sexual harassment."*

**EEPC Response:**

The EEPC recognizes the agency's commitment to implement corrective action #4. Please provide documentation of directives or decisions between the agency head and the principal EEO Professional that impact the administration and operation of programs, policies, or procedures concerning sexual harassment.

**Corrective Action #5:**

Ensure that managers and supervisors are held accountable for enforcing the agency's sexual harassment prevention policies and complaint procedures. Document this expectation and its implementation.

**Agency Response:**

*"Steps to be taken: The Board's representative managerial performance evaluation form states that one of the responsibilities of a manager is to: "Make employment decisions based on merit and equal consideration, and treat others in an equitable and impartial manner." For its next round of employee performance evaluations, the Board plans to implement EEPC's suggestion to list this standard under the key performance responsibility of "Enforces City and Agency personnel procedures within the Legal Advice Unit," or the equivalent primary key performance responsibility for managers."*

**EEPC Response:**

The EEPC recognizes the agency's commitment to implement corrective action #5. The EEPC will monitor the agency for implementation of this managerial expectation.

**Final Action:**

Upon the EEPC's determination that the entity does not require further review or monitoring: Distribute a memorandum signed by the agency head that re-emphasizes the commitment of agency administrators to the EEO program, including the prevention of sexual harassment, and informs employees of any changes to the agency's employment practices as a result of the EEPC's audit/monitoring. This final action is required to conclude the audit and monitoring process.

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



**Sasha Neha Ahuja**  
Chair

**Angela Cabrera**  
**Malini Cadambi Daniel**  
**Elaine S. Reiss, Esq.**  
**Arva R. Rice**  
Commissioners

**Charise L. Terry**  
Executive Director

**Jennifer Shaw, Esq.**  
Executive Agency Counsel/  
Director of Compliance

**253 Broadway**  
**Suite 602**  
**New York, NY 10007**

212. 615. 8939 tel.  
212. 676. 2724 fax

**BY MAIL AND EMAIL**

May 7, 2020

Carolyn Miller  
Executive Director  
Conflicts of Interest Board  
2 Lafayette Street, Suite 1010  
New York, NY 10007

Re: Resolution # 2019AP/239-312(2020)C5  
DETERMINATION: Compliance

Dear Executive Director Miller:

On behalf of the members of the Equal Employment Practices Commission (EEPC), I write to inform you that pursuant to New York City Charter Chapter 35, Sections 815(a)(15) and (19), which requires agency heads to ensure and promote equal opportunity for all persons in appointment, payment of wages, development, and advancement, and to establish measures and programs to ensure a fair and effective affirmative employment plan to provide equal employment opportunity (EEO) for minority group members and women, the EEPC's Board of Commissioners has approved the attached Determination.

Thank you and Principal EEO Professional Katherine Miller for the cooperation extended to the EEPC during the course of our review, evaluation, and monitoring of your agency's employment and EEO-related practices.

Sincerely,

A handwritten signature in black ink, appearing to read "Sasha Neha Ahuja".

For Sasha Neha Ahuja  
Chair

c: Katherine Miller, Principal EEO Professional, COIB





This  
*Determination of Compliance*

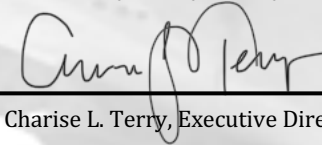
*is hereby issued to*

*Conflicts of Interest Board*

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*for successful implementation of 6 of 6 required corrective action(s),  
thereby achieving compliance with the Equal Employment Practices Commission's  
Sexual Harassment Prevention and Response Practices  
from January 1, 2017 to this date.*

On this 7<sup>th</sup> day of May in the year 2020,



---

Charise L. Terry, Executive Director

*In care of Executive Director Carolyn Miller  
and Principal EEO Professional Katherine Miller*