

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

## **Fiscal Year 2024**

### **NYC Commission on Human Rights**

**[Insert Agency Photo  
(Optional)]**



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

The NYC Commission on Human Rights (NYCCHR) enforces the New York City Human Rights Law, one of the broadest anti-discrimination laws in the nation. The Commission fosters compliance with the City's internal EE policy by ensuring that staff, employees, applicant for employment, contractors, consultants, interns, agency partners, and others understand their rights and protections, and that the policy is effectively enforced. The Commission has a venerable history of promoting dignity and equality for all. As the Chair & Commissioner, I've had the honor to deepen the agency's work advancing fundamental rights across the five boroughs since joining the agency in October of 2021.

I am proud of the work we do and our staff that helps to implement the City's human rights law. The Commission's work enforcing the right to be free from discrimination, harassment, and unfair treatment continues to illuminate how disparities and divisions have fueled mistrust and hate, on the basis of race, color, national origin, religion, sexual orientation, gender identity and other categories protected by the Human Rights Law. And our efforts remain on prevention: through awareness-raising, by building bridges across communities, through restorative justice, and the implementation for the Human Rights Law's protections. For the Commission, equity, dignity, and non-discrimination remain the cornerstone of our efforts.

The Commission's team has a wide range of civil rights and human right experience, and backgrounds, and speaks over 30 languages other than English. It is through our team's ongoing dedication that we have cultivated ties to community-based organizations, neighborhood and business association, faith communities, legal service providers, and other stakeholders that are essential to our work to ensure all New Yorkers can thrive.

The Commission will continue to respond to the diverse needs of New Yorkers through our law enforcement, community relations, and policy work. We will continue to strengthen our efforts to foster inclusion, equity, empathy, and respect for all staff so that all of us are able to show up as our authentic selves and succeed regardless of identity. To that end, I have prioritized bringing staff together for formal and informal wellness and mindfulness activities, creating spaces for engagement, reflection, and relationship

building. This includes hosting our annual outdoor all staff wellness retreat this fall. I have also worked to meet with leaders and residents from New York's diverse communities, so that our presence is known, and so that we can meet New Yorkers where they are. Diversity, equity, and inclusion are a critical component of all of the commission's work external and internal.

Our Office of Equal Employment Opportunity & Equity and Inclusion (EEO & EI) works to fulfill our mission by ensuring that our workplace is free from unlawful discrimination and harassment, and that our employment practices align with all applicable policies, directives, and mandates. Additionally, our EEO office continues to develop and sustain strategic initiatives, such as an enhanced talent pipeline, increased opportunities for employee engagement and inclusion, greater access to opportunities for career building and development, and measures for succession planning and legacy building. The Commission's Chief EEO Officer is Medgine Sanon-Ellis, who will serve as a resource for all agency staff regarding employment best practices and guidance, and her contact information will be made prominently available to all our employees. Mrs. Sanon-Ellis will also serve as a point of contact regarding any questions,

inquiries, concerns or complaints regarding our EEO rights and responsibilities under the New York City EEO Policy and applicable law.

The Commission holds all staff accountable for fostering a workplace culture built on equity, fairness and respect for all. To ensure this happens, we continue to require that all staff, including interns take the EEO, sexual harassment prevention, inclusion and diversity, and LGBTQI training within 30 days of their start date. I will continue to partner with our Office of EEO & Equity and Inclusion to disseminate timely and relevant messaging that underscores my commitment to EEO, diversity and inclusion, and my expectation that all staff support the City's EEO policy and ensure that all are in compliance with the policies.

All of us are New Yorkers who have a vision for a City where human rights-dignity and equality- are a reality for all. Together, I believe we can make the change we want to see in the world.

This statement is the same as last year.

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

## II. Recognition and Accomplishments

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

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

1. Integrated succession planning in the agency activities to develop a pipeline, facilitate a seamless transition and continuity of service.
  - The Commission has begun to document process and procedures for specialized tasks to better understand the roles of staff and plan for transitions.
2. Agency achieved 100% compliance with all mandatory EEO trainings for new staff.
  - Trainings required are: Sexual Harassment prevention, Citywide EEO policy, a four-part

module that includes diversity and inclusion training, and LGBTQ: Power of Inclusion.

3. The Commission took initiatives to create an inclusive work environment that values differences and that focus on retaining talent across all levels.

- We created a hiring committee that is committed to attracting and retaining diverse staff members. All members of the hiring committee are required to attend mandatory trainings such as non-bias trainings, creating an inclusive workplace and other DEI-related trainings. We will honor their experiences, perspectives and unique identity. Together we strive to create and maintain a working and learning environment that is inclusive, equitable and welcoming. We have also attended hiring fairs to attract a more diverse



hiring pool of candidates with the goal of facilitating a more efficient hiring process by allowing prospective employees to complete initial screening, interview, and assessment in a single location, thereby accelerating the hiring process and saving time and resources. In addition, we have provided exiting staff members with an exit interview to learn where the agency can improve in, to make sure employees leave feeling good about their service and, in some cases, to encourage the employee to stay under new circumstances. We will continue to utilize the feedback provided to make improvements for all employees.

4. Undertook initiatives to improve community relations, community awareness, and to engage communities being served in recruitment efforts, service development and delivery.

- We take pride in the fact that our staff members speak a variety of different languages spoken by the communities we serve. We now speak 32 languages. The Commission is also partnering with Work Well NYC to ensure that all employees are aware that they have access to fun and free wellness resources. Employees have had an opportunity to attend meditation classes as well as DEI trainings to date. We hosted a Staff Appreciation Celebration where awards were given to staff members for longevity of service as well attendance. Additionally, our employee engagement committee hosts an annual decorating competition where staff participated as individuals or as a part of a team and competed for the best decorated space.

### III. Workforce Review and Analysis

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

Total Headcount: 108

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

[Pursuant to Local Law 27 (2023), provide an analysis of your agency's compensation data and measures to address pay disparity and occupational segregation in FY 2023. The term "occupational segregation" means a group's under-representation or over-representation in certain jobs or fields of work, when such group is protected by the employment related provisions of the city's human rights law and such group does not benefit from greater

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

The Commission ensures that there is pay equity amongst job titles. Due to the Civil Service Availability used by Department of Citywide Administrative Services (DCAS), derived from the certified eligibility lists using the Social Worker title, CCHR believes the analysis is flawed (as repeatedly articulated to DCAS). This is evidenced by CCHR only possessing six out of one hundred thirty-four titles – four of which are specific to the agency.

Regardless, the Commission will address underutilization and seek to ensure that historically underrepresented communities are able to join our team. Specific initiatives that the Commission will undertake include deepening the applicant pools for posted positions through broader outreach; encouraging applications for civil service exams and reviewing quarterly workforce data to inform recruitment. The Commission will also seek to address forthcoming retirement or gaps in talent through succession planning and creating pipelines for growth and advancement of current staff. A focus on developing the skills and capacity of current staff will include fostering coaching and mentoring and ensuring professional development programs and opportunities

are available for staff, as well as placing a focus on staff wellbeing and mental health. The agency will also take steps to ensure pay and promotions are equitable.

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

Beginning with the on-boarding process our HR department, provides all new employees with the DCAS self-identification form. Our EEO office informs all new staff members of the City's EEO policies and procedures. In addition, our HR department will send reminders periodically via email to staff members, informing them that they will have the ability to update the status as needed.

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

- NYCAPS Employee Self Service (by email; strongly recommended every year)
- Agency's intranet site
- On-boarding of new employees
- Employees unable to complete the self-identification form using ESS will be provided an opportunity to submit paper form to the EEO Office.
- In FY 2024, the agency will inform and remind employees of the option to add preferred name in ESS.

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

The EEO Office continues to conduct reviews of the CEEDS workforce reports and summary sent by CEI. This will include reviewing the workforce composition based on job titles, job group classification, race, ethnicity and gender, new hires and promotions.

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

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

**[Select the options that apply to your agency.]**

Agency Head

Quarterly  Semi-Annually  Annually  Other \_\_\_\_\_

Human Resources

Quarterly  Semi-Annually  Annually  Other \_\_\_\_\_

General Counsel

Quarterly  Semi-Annually  Annually  Other \_\_\_\_\_

Other (EEO)

Quarterly  Semi-Annually  Annually  Other \_\_\_\_\_

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

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

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

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

❖ **Workforce:**

- The Commission will continue to track and improve its hiring practices to ensure that we are recruiting, attracting and retaining diverse candidates. We will continue to create diverse and equitable job postings as well as utilize our hiring committee to ensure uniform candidate screenings occur for all vacancies. We will also continue to

develop and sustain strategic initiatives, such as an enhanced talent pipeline, increased opportunities for employee engagement and inclusion, greater access to opportunities for career building and development, and measures for succession planning and legacy building.

- We recognize that our diverse staff is our greatest asset, and we are committed to ensuring the recruitment, development and retention of staff that reflect the diversity of NYC. It is a goal that we keep at the forefront of our minds when we share our vacancies internally and externally with organizations, community partners and sibling agencies. We have the goal of developing a robust training program to encourage internal candidates to become informed and obtain experience that would make them the best prospects for promotion.

#### ❖ Workplace:

- It is of the utmost importance that we provide our employees with an environment that prides itself on diverse experiences, education and thoughts.
  - Ensuring EEO team involvement in the hiring and promotional processes, including reviewing job postings, offering trainings for department heads, and hiring managers on best practices | recruitment, and sitting in on interviews.
  - Conducting EEO managerial performance evaluations.
  - Conducting annual performance evaluations.
  - Maintaining an active employee engagement committee.
  - Continuing to provide professional development opportunities. In FY23, we offered our managerial staff the opportunity to work with a professional development coach.

#### ❖ Community:

- The Commission's Community Relations Bureau (CRB) unit prides itself on outreach to the public to create awareness of CCHR's mission as well as our investment in our communities. Our outreach staff is committed to educating the public on the NYCHRL. Some of our initiatives in FY24 include:
  - Ensuring that our resources are accessible to all New Yorkers by building on our robust program of community education and outreach work promoting diversity and inclusion and continuing to provide monthly workshops to the public in each of the five boroughs.
  - Actively engage M/WBE vendors by coordinating agency sponsored events, collaborating with, and participating in events with sister agencies and developing programming with CRB to further engage the business community.
  - Continuing to engage in interfaith and faith-based events, and building relationships with interagency partners, community-based organizations, and the business community.



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

- Providing professional mentorship, skills-building and relationship building opportunities to increase advancement prospects for underrepresented staff; holding safe space forums to address areas of concern for staff such as cultural competency, diversity and inclusion, including First Friday events, watch parties and beginning next quarter “Lunch and Learn” Opportunities.
- Continuing to investigate and resolve complaints of discrimination and continuing to conciliate or litigate cases that may have a high impact on New York City and our efforts to curb unlawful discrimination.
- Continuing our internal and external (social media) messaging arounds days and months that celebrate diversity and inclusion (Hispanic Heritage Month, Juneteenth; an Disability in Employment)

**2. Planned Programs, Initiatives, Actions**

- We will begin our affinity groups including talking circles that aim to provide safe space conversations for all employees as well as continue with our Employee Engagement’s First Friday events. We will create a forum that allows for all employees to discuss issues that they feel are relevant to the nature of our work here at the Commission and will use the feedback to structure activities, events and trainings tailored at ensuring all are heard at the Commission.

**A. Workforce**

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

1. Providing professional development opportunities for employees. The agency continues to create training opportunities as well as professional development opportunities on relevant topics. For FY24, the agency will begin the Lunch and Learn series which would invite leaders from both the public sector and private sector to provide staff with insight to guide their thinking about career paths throughout the city.
2. Ensuring that all hiring managers are trained on equitable and diverse hiring and interviewing practices that align with diversity, equity and inclusion. The Commission will continue to review and revise all job postings to ensure that the language used is equitable. We will continue to provide training to appropriate hiring managers on a continuous basis. We will also provide additional trainings to staff members on diversity, equity and inclusion.
3. Continuing to provide anti-discrimination trainings such as working with transgender and non-gender conforming people. We will continue to engage in ongoing discussions centered at anti-black racism. The Commission continues to provide anti-discrimination training aimed at raising awareness both internally and for the general public. We will also provide opportunities for members of the public to provide feedback on the services that we offer during events that we

create or collaborative with sibling

agencies. Doing so will help to identify gaps in service and how to adequately address those given our budgetary constraints.

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

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

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

The Commission continues to prioritize an inclusive workplace and creating safe spaces to discuss and address barriers to equity and initiatives. We will continue to review policies, procedures, and practices related to targeted outreach and recruitment. We will continue to not only provide training but to reestablish affinity groups similar to our employee engagement teams that provide staff with a forum to pitch ideas, teambuilding exercise and foster a sense of belonging. We will evaluate the impact of the initiatives by allowing staff to have a forum where they can provide feedback about the employee engagement initiatives launched at the Commission.

Additionally, we will continue to implement exit interviews with departing staff to better respond to and identify workplace issues to improve climate and retention.

## **B. Workplace**

**[Describe specific actions designed to create inclusive workplace culture, enhance equity, and initiatives undertaken to address race relations in the agency. (e.g., modeling inclusive language such as**

preferred pronouns and age-inclusive language on job postings, celebrating heritage months, ensuring worksite and meetings are accessible, creating agency specific surveys or implementing initiatives based on previous agency specific surveys, etc.).]

[Select the options that apply to your agency.]

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

List below the names of existing ERGs:

1. Employee Engagement Team
2. LGBTQ Working Group
3. Black Employees Working Group

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

Agency Diversity Council is in existence and active

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

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

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

## **C. Community**

[In addition to the strategic goals above, please describe in details specific initiatives, programs and policies planned with respect to your agency's services to the community. This should include initiatives to enhance equity, improve community relations and increase awareness about services offered by your agency.] Through the work of our CRB unit, we have held various events and workshops that support equity and inclusion, increase awareness of our agency's mission and improve community relations. Below are some of the events:

The Commission's Community Relations Bureau (CRB) executive team continues to hold regular meetings with CRB staffers to provide mentorship, relationship-building, and skill building opportunities. Under normal circumstances when resources and external budgetary constraints permit, CRB's executive team actively seeks out advancement opportunities for its staffers. CRB holds monthly staff meetings, biweekly Directors' and Lead Advisers' meetings, and weekly supervisions with staffers, along with individual check-in meetings. The executive

team members also consult with borough office teams and invite staffers along to events and networking opportunities as often as possible.

The Law Enforcement Bureau (LEB) team has weekly attorney staff meetings during which training opportunities are offered in applying the NYC Human Rights Law (NYCHRL) in the case scenarios they investigate. They also discuss current issues that the Commission has or would like to investigate.

The Office of the Chair's policy team meets weekly to discuss pending projects, and weekly individual staff check-ins with the supervisor provide a forum to work on development of substantive knowledge and skill development.

The Commission continued to run public facing events, programs and resources celebrating the richness and diversity of the city's communities and reinforcing the themes of equity and inclusion.

In March 2024 the Commission will host a Women and Hispanic Leadership roundtable

We will also be hosting a Women's History Month Gender Justice Career Fair

On March 28, 2024, the Commission will be hosting a Lunch & Learn: African Diasporic Traditional Religions event.

For May 2024 – The Commission in collaboration with the Asian American and Pacific Islander organization will host an art as advocacy event.

In FY 2024, the agency will:

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

## **V. Recruitment**

### **A. Recruitment Efforts**

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

In addition to the work mentioned throughout this report, the Commission will proactively focus on sharing posted positions and will continue to refine and expand targeted outreach and recruitment efforts. We will continue to review policies, procedures, and practices related to targeted outreach and recruitment. Utilize the Inclusive Recruitment Guide issued by the Office of Citywide Equity and Inclusion to develop strategic recruitment plans. Review underutilization in job groups to inform recruitment efforts. Identify 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 EEO protection and rights. Assess agency job postings to ensure new diversity, inclusion, and equal opportunity employer messaging is included.

CCHR's dashboard includes underutilization of females and Black individuals in the social work category. As previously mentioned, due to the Civil Service Availability used by Department of Citywide Administrative Services (DCAS), derived from the certified eligibility lists using the Social Worker title, CCHR believes the analysis is flawed (as repeatedly articulated to DCAS). This is evidenced by CCHR only possessing six out of one hundred thirty-four titles – four of which are specific to the agency.

CCHR has discussed this understanding with DCAS and the EEPC several times. Nevertheless, CCHR continues to implement the following steps to address underutilization: (i) The Equal Employment Opportunity Team works with Human Resources to review the agency's hiring needs and hiring plans; (ii) CCHR creates targeted diversity and recruitment strategies that include strategic partnerships with internal and external partners; including identifying new career fair opportunities for recruitment and creating pipelines to hiring through internships; (iii) CCHR has diverse interview panels and uses structured interviewing; and (iv) CCHR pursues employee engagement, coaching, mentorship, and access to career counseling.

## **B. Recruitment for Civil Service Exams**



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

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

<b>Event Date</b>	<b>Event Name</b>	<b>Borough</b>
11-15-23	LGBTQ Bar Association Event	Virtual
09-27-23	Haitian American Lawyers of NY Event	Virtual
08-28-23	NYC Hiring Hall	Brooklyn

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

<b>Borough</b>	<b>Approximate Dollar Amount (\$)</b>
Bronx	0

Brooklyn	0
Manhattan	0
Queens	0
Staten Island	0

### C. Recruitment Sources

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

1. Share vacancies with sibling agencies
2. Share vacancies with Law School alumni networks
3. Promote job vacancies via social media, our website, LinkedIn and other hiring platforms.
4. Participate in community events and discussing job opportunities.

### D. Internships/Fellowships

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

The agency provided the following internship opportunities in FY 2023:

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	12		M _2_ F_10_ Non-Binary ___ Other ___ Unknown ___
4. Summer Graduate Interns		1	M ___ F_1_ Non-Binary ___ Other ___ Unknown ___
5. Other (specify):			M ___ F ___ Non-Binary ___ Other ___ Unknown ___

### E. 55-a Program

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

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

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

Agency uses mostly non-competitive titles which are not eligible for the 55-a Program.

Agency does not use the 55-a Program and has no participating employees.

While most of our titles are non-competitive and are not eligible for 55-a, CCHR is

committed to use 55a when appropriate and to participate in programs and activities that attract 55-a program applicants and support eligible candidates in the application process.

## VI. Selection (Hiring and Promotion)

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

### A. Career Counselors

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

- Although we do not have a designated career counselor, CCHR encourages all staff to take developmental/skills courses offered through the DCAS Citywide Training Center. Our agency's training liaison circulates all training available to all staff members.
- In FY23, we provided professional coaching opportunities to leadership and senior management. We have made it a priority to promote internal candidates to senior positions when appropriate. We will continue to ensure that all staff members are made aware of opportunities. We will continue to promote civil service exam lists and Civil Service 101 sessions delivered by the Office of Citywide Recruitment.

### B. New Hires and Promotions

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

We have made it a priority to promote internal candidates to senior positions, when appropriate. We have ensured that all staff members are made aware of opportunities. We have created a hiring committee that is tasked with reviewing all applications including internal candidates. The hiring committee will continue to screen candidates to ensure that they meet the minimal qualifications for the role. The hiring committee will also continue to pass along blind resumes to the hiring managers of qualified

candidates after the screening process has been completed to ensure an unbiased process has occurred for each candidate to be afforded an opportunity to employment with our agency.

We will continue to post all positions internally and notify employees of open positions, including whether a position represents a promotional opportunity.

All internal candidates who applied for the vacancy and meet the minimum qualification requirements will be provided with an opportunity to interview for the vacancy, unless the employee does not have the listed qualifications.

We will continue to participate in job fairs and provide postings to diverse organizations and collaborate with community partners to provide information related to vacancies.

We also employ college students with internship and fellowship opportunities to promote future employment opportunities.

### C. EEO Role in Hiring and Selection Process

[Briefly detail which stages of selection involve your EEO Officer (pre- and post-selection).] In FY 2024, the agency EEO Officer will do the following:

- Ensure that all vacancy announcements include the revised NYC EEO I Anti-Discrimination Statement.
- Review vacancy postings to ensure elimination of language that has the potential for gender and age stereotyping and other unlawful discrimination. (It is recommended to use gender- neutral terms and pronouns and language that is age-inclusive).
- Actively monitor agency job postings and ensure recruitment strategy aligns with the diversity goals of the agency.
- Provide consultation regarding creation/review of objective criteria for evaluating candidates for hire or promotion and applying those criteria consistently to all candidates.
- In collaboration with the Director of Human Resources, review interview questions to ensure that they are EEO-compliant, job-related, and required by business necessity.
- Assist the hiring manager if a reasonable accommodation is requested during the interview.
- Observe interviews, when necessary, especially for underutilized job titles and/or mid- and high-level discretionary positions.



- Advise Human Resources to use candidate evaluation form for uniform assessment and equity.
- Periodically review candidate evaluation forms and conduct a job applicant analysis via the NYCAPS eHire Applicant Interview Log reports to advise Human Resources of any demographic trends and/or EEO concerns based on available self-ID data.
- Review hiring package to evaluate that the selection process was conducted in accordance with EEO best practices.
- Other: \_\_\_\_\_

#### D. Layoffs

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

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

## VII. Training

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

Training Topic	Type of Audience (e.g., All Staff, Front-line Employees, Managers, Supervisors, etc.)	Goal Number of Participants	Projected Dates
1. Everybody Matters: EEO and Diversity & Inclusion Training for NYC Employees (e-learning)	All employees – Biennially (Cycle 2 must be completed by March 31, 2025.)	Goal 5– Participants- All new staff within 30 days of start date. Current staff: every 2 years	3/31/24
2. Everybody Matters: EEO and Diversity & Inclusion Training for NYC Employees (classroom/live webinar)	All employees – Biennially (Cycle 2 must be completed by March 31, 2025.)	Goal 5– Participants-	3/31/24
3. Sexual Harassment Prevention (e-learning)	All employees – Annually (Cycle 6 runs between September 1, 2023 – August 31, 2024)	Goal 5– Participants- All new staff within 30 days of start date. Current staff: every 2 years	8/31/24
4. Sexual Harassment Prevention (classroom/live webinar)	All employees – Annually (Cycle 6 runs between September 1, 2023 – August 31, 2024)	Goal 5– Participants-	8/31/24
5. IgbTq – Power of Inclusion (e-learning)	Managers, Supervisors, and Front-line employees (must be completed by March 31, 2024)  All other employees	Goal 5– Participants- All new staff within 30 days of start date. Current staff: every 2 years	by 3/31/24
6. IgbTq – Power of Inclusion (classroom/live webinar)	Managers, Supervisors, and Front-line employees (must be completed by March 31, 2024)	Goal 5– Participants-	3/31/24

	All other employees		
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7. Disability Awareness and Etiquette	All Staff	Every 2 years	Ongoing
8. Structured Interviewing and Unconscious Bias (classroom/live webinar)	Hiring Managers, EEO team members	10-15 staff	Per DCAS schedule.
9. Anti-Black Racism	All Staff	10-15 staff	Ongoing
10. Human Rights Law	All Staff	10-15 staff	Ongoing

## VIII. Reasonable Accommodation

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

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

The Chief EEO Officer and/or the Reasonable Accommodations Officer engages in a cooperative dialogue with the employee requesting the accommodation to assess the reasonable accommodation request to make (1) a determination as to whether the accommodation is needed, and (2) if needed, whether the accommodation would be effective, and (3) if effective, whether providing the reasonable accommodation would impose an undue hardship on the agency. The requestor is also provided with alternative accommodations that may also address the limitations.

The EEO Office will consult the supervisor where appropriate regarding the nature of the accommodation.

If the reasonable accommodation request is equipment-related, supported by medical documentation, and gives the employee the ability to perform his/her required tasks and the agency can afford it; the EEO Office obtains the equipment through the agency's procurement process or consults with facilities to determine if the equipment is already available in our supply room.

If the reasonable accommodation involves a request for a personnel action (such as leave, modified or part-time schedules, modified workplace, or

reassignment), the employee's current position, the needs of the agency, and the impact on the agency is assessed. The Americans with Disabilities Act ("ADA") and the Family and Medical Leave Act ("FMLA") are also reviewed as part of this process.

After exploring the possible accommodation, the employee receives written notification of the request approval or denial. Where the request is denied, the letter includes the fact that the employee may file an appeal with the Commissioner.

Within fifteen (15) business days of the receipt of the appeal, the Commissioner issues a written determination and, if granted, the EEO Officer monitors implementation of the reasonable accommodation.

- Managers, supervisors, human resources personnel and discipline personnel are required to report to the EEO Office any reasonable accommodation requests and needs that are received, observed, learned about, or suspected, so that the EEO Office may facilitate discussions, research appropriate accommodations, and assist with the resolution of the matter.
- Absent of any undue hardship, the agency provides reasonable accommodation for disability, religion, victims of domestic violence, sex offense and stalking, pregnancy, childbirth, or a related medical condition.
- The agency follows the City's Reasonable Accommodation Procedure.
- The agency grants or denies request 30 days after submission or as soon as possible.
- The Agency Head or designee must review and grant or deny an appeal fifteen (15) days after submission of appeal.
- If the review and decision on appeal is not done by the Agency Head.  
Provide the name and title of the designee<sup>1</sup> : \_\_\_\_\_
- The designee reports directly to the Agency Head.
- The agency will input the Reasonable Accommodation activity on the DCAS Citywide Complaint and Reasonable Accommodation (CAD) Database and update the information as needed.

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



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

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

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

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

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

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

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

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

Employees have access to gender appropriate bathrooms and lactation rooms.

Employees are provided with information on how to request workplace accommodations and has access to respective facilities, including access for individuals with disabilities.

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

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

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

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

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

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

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

## X. Audits and Corrective Measures


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

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

## XI. Agency Head Signature

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

Print Name of Agency Head

DocuSigned by:  
Signature of Agency Head  
  
\_\_\_\_\_

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04.11.2024  
\_\_\_\_\_

Date

## Appendix A: Contact Information for Agency EEO Personnel

Agency EEO Office mailing address: 22 Reade Street, 2<sup>nd</sup> floor, New York, NY 10007

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

	<b>Title/Function</b>	<b>Name</b>	<b>Email</b>	<b>Telephone</b>
1.	<b>Agency EEO Officer</b> [indicate if 'Acting' or 'Interim']	Medgine Sanon-Ellis	msanonellis@cchr.nyc.gov	212-416-0138
2.	<b>Agency Deputy EEO Officer</b> [if appointed]			
3.	<b>Agency (Chief) Diversity &amp; Inclusion Officer</b> [if appointed]			
4.	<b>Chief Diversity Officer/Chief MWBE Officer per E.O. 59</b>	Sheshe Segar	SSegar@cchr.nyc.gov	212-416-0123
5.	<b>ADA Coordinator/ Disability Rights Coordinator/ Disability Services Facilitator</b>	Anna Martinez	amartinez@cchr.nyc.gov	212-416-0112
6.	<b>55-a Coordinator</b>	Taiwo Onabanjo	tonabanjo@cchr.nyc.gov	212-416-0191
7.	<b>EEO Investigator(s)</b>	Alphonso Chris Smith	aosmith@cchr.nyc.gov	212-416-0229
8.	<b>EEO Training Liaison(s)</b>	Vanessa Ramos	vramos@cchr.nyc.gov	212-416-0193
9.	<b>EEO Counselor(s)</b>	Arielle Cranston	acranston@cchr.nyc.gov	212-416-0171
10.	<b>Accommodations Officer</b>	Ta-Tianna Stephenson	tastephenson@cchr.nyc.gov	212-416-0220

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

### Agency Name:

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

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

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

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

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

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

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

Event Date	Event Name	Borough
8-28-23	NYC Hiring Hall	Brooklyn
9-27-23	Haitian Lawyers of New York Virtual Event	Virtual
11-15-23	LGBTQ Bar Association Event	Virtual

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