



**CITY OF NEW YORK  
CONFLICTS OF INTEREST BOARD**

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**Diversity, Equity, Inclusion and Equal  
Employment Opportunity Plan (“EEO Plan”)**

**Fiscal Year 2026**

**Conflicts of Interest Board**

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## I. Introduction

This Diversity, Equity, Inclusion and Equal Employment Opportunity Plan (“EEO Plan”) describes measures and programs that the agency will undertake in FY 2026 to ensure fair and effective efforts to provide equal employment opportunity, including for minority group members and women.<sup>1</sup>

## II. Annual Commitment, Accountability, and EEO Statement (EEO Policy Statement).

The New York City Conflicts of Interest Board (“COIB”) is committed to providing equal employment opportunities to all individuals and to a diverse, equitable, and inclusive workplace.

COIB is committed to providing a work environment free from discrimination, harassment, and retaliation based upon any legally protected status or protected characteristic under the City’s Equal Employment Opportunity (“EEO”) Policy, as well as federal, State, and City laws. COIB will also review requests for reasonable accommodation in accordance with such laws. To implement this commitment, COIB has issued an EEO Policy incorporating the City’s EEO Policy to inform all employees and applicants of their rights and obligations under federal, State, and City laws. All COIB staff are required to comply with COIB’s EEO Policy and the City’s EEO Policy. Any employee or applicant who wants further information or believes they have been subject to discrimination, harassment, or retaliation should contact COIB’s EEO Officer or EEO Counselors.

To set forth its goals and initiatives in maintaining a diverse and inclusive workforce, COIB has issued an annual Diversity, Equity, Inclusion and Equal Employment Opportunity (“DEI-EEO”) Plan. COIB’s EEO Officer and agency leadership will work together to identify and eliminate any potential structural barriers to employment and will collaborate on recruitment and hiring strategies.

COIB has designated the following personnel to lead this work:

- Katherine J. Miller serves as EEO Officer. She can provide information about all EEO-related matters, including inquiries about the law, requests for reasonable accommodation, and complaints of discrimination, harassment, or retaliation. Katherine can be reached at 212-437-0730 or [kmiller@coib.nyc.gov](mailto:kmiller@coib.nyc.gov).
- Alex Kipp and Maryann White serve as EEO Counselors. They may assist the EEO Officer in investigations and are available to handle EEO-related matters as an alternative to the EEO Officer. Alex can be reached at 212-437-0770 or [kipp@coib.nyc.gov](mailto:kipp@coib.nyc.gov). Maryann can be reached at 212-437-0727 or [white@coib.nyc.gov](mailto:white@coib.nyc.gov).
- Tasnia Karim serves as Career Counselor. She can provide information on civil service examinations, job vacancies and how to apply for those positions, and recommendations

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<sup>1</sup> See the Agency EEO Plans of the NYC EEO Policy (Section X) as well as the Agency Guide for preparing this template.

for professional learning and development. Tasnia can be reached at 212-437-0750 or [karim@coib.nyc.gov](mailto:karim@coib.nyc.gov).

COIB's EEO Policy is available on the intranet and can be accessed at <http://coibapps2019/coibintranet/docs/coib-eeo-policy.pdf>.

The City's EEO Policy, Reasonable Accommodation Process, EEO Complaint Process at a Glance, and other EEO-related information are available at: <https://www.nyc.gov/site/dcas/agencies/equity-and-inclusion.page>.

☐ This statement is the same as last year.

**NOTE:** If this statement has been in use for more than **two** years the Agency Head should issue a revised statement.

☒ This statement will be disseminated to all employees in the agency, at least annually, as required by the EEO Policy.

☒ Agency fulfills its obligation to inform employees of their rights and protections under the New York City EEO Policy

### III. Recognition and Accomplishments

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

1. The agency has a 100% completion rate for the "Everybody Matters: EEO and Diversity Inclusion for NYC Employees" training.
2. The agency has a 100% completion rate for the "Sexual Harassment Prevention" training.
3. The agency utilized a minority-owned business to provide cleaning services at the workplace.
4. In connection with heritage months and City holidays, the Agency Head sent an email to all Staff about Women's History Month, explaining the history of the month, listing celebrations throughout the City, and providing resources to learn more.
5. In connection with promoting diversity and inclusion programming, the EEO Officer shared with all Staff invitations from other City agencies to participate in events to celebrate Hispanic Heritage Month and Black History Month and to attend a panel discussion about empowering people with invisible disabilities.
6. The agency began recruiting for an open Agency Attorney position with the possibility of promotion to a Manager position. The job posting was shared with many law schools, including six law schools at historically black colleges and universities ("HBCUs"), and several bar

associations, including the Metropolitan Black Bar Association and the National Black Law Student Association. Within the resulting applicant pool, the percentage of applicants who self-identified as Black was slightly higher than the percentage of law school graduates who identify as African American based on data from the American Bar Association.

## IV. Workforce Review and Analysis

**Total Headcount: 21**

**Unknown Race/Ethnicity: 3**

**Unknown Gender: 0**

**Unknown Both: 0**

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 2025. If your agency conducted such analysis in previous years, please describe agency actions undertaken as a result of the analysis.

*\*\* Please note: The agency is responsible for providing the above information regarding pay equity analysis. In addition, it is the agency's responsibility to prepare and submit a separate report pursuant to Local Law 27 (2023).<sup>2</sup>*

Occupational segregation is deemed to exist when a group is under-represented or over-represented in any job type or field of work, when such group is protected by the employment related provisions of the City's Human Rights law, and such group does not benefit from greater pay, responsibility, flexibility, stability, prestige, or other indicators of job desirability within the job type or field of work. Occupational segregation may appear in lower paying as well as higher paying job types.

1. [While DCAS has engaged an external vendor to conduct a citywide job evaluation pay equity analysis of the city government workforce, pursuant to Local Law 27 (2023), agencies must conduct their own analysis of compensation practices and measures to address pay disparity and occupational segregation with regard to the various titles they use.
  - Describe below your agency's analysis of compensation data, including conformity with collective bargaining agreements and Mayor's Personnel Orders (MPO).
  - Also describe possible indicators of occupational segregation such as significant over- or under-utilization of certain ethnic or gender categories in major Job Groups.
  - If such analysis was conducted in previous years, describe actions undertaken to reduce occupational segregation.]

a) Analysis of Agency Compensation Data:

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<sup>2</sup> Local Law 27 (2023) requires that a separate report be submitted by September 30 annually to the Mayor, the Speaker of the Council, the Department of Citywide Administrative Services, and the Equal Employment Practices Commission.

Pursuant to Local Law 27 (2023): The EEO Officer checked for pay disparities in FY 2025 by analyzing the base salary, managerial levels, years of service, scope of responsibilities, and demographics of employees who hold the same business and civil service titles. The EEO Officer analyzed the titles of Education and Engagement Specialist/Community Associate (2 employees); Director/Executive Agency Counsel (2 employees); Deputy Director/Executive Agency Counsel (2 employees); and Associate Counsel/Agency Attorney (3 employees). While no employees earn identical salaries, the difference in salaries is based on years of service, years of prior experience, and the scope of responsibilities in their position or unit. The agency has determined that there are no pay disparities based on gender or race.

b) Indicators of Occupational Segregation:

The EEO Officer checked for occupational segregation in FY 2025 by reviewing the most recent workforce composition report to identify job groups with underrepresentation of individuals who identify as a particular gender or race.

c) Actions undertaken to reduce occupational segregation considering previous analyses:

See Section V.A below for the agency's plans to address underrepresentation.

2. [Indicate, below, all 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. Check all appropriate boxes.]

- ☒ NYCAPS Employee Self Service (by email; strongly recommended every year)
- ☐ Agency's intranet site
- ☒ On-boarding of new employees
- ☒ In FY 2026, the agency will inform and remind employees of the option to add preferred name in ESS.

3. Review and Analysis of Workforce Reports

- ☒ 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.

- ☒ 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 EEO officer conducts workforce review with the following agency units:

**Agency Head**

☐ Quarterly ☐ Semi-Annually ☒ Annually ☐ Other \_\_\_\_\_

**Human Resources**

☐ Quarterly ☐ Semi-Annually ☒ Annually ☐ Other \_\_\_\_\_

**General Counsel**

☐ Quarterly ☐ Semi-Annually ☒ Annually ☐ Other \_\_\_\_\_

**Other (specify): EEO Officer**

☒ Quarterly ☐ Semi-Annually ☐ Annually ☐ Other \_\_\_\_\_

## **V. EEO, Diversity, Inclusion, and Equity Initiatives for FY 2026**

### **A. WORKFORCE**

**State your Agency's general goals and strategies to enhance DEI and EEO aimed to enhance your agency workforce.**

- Monitor for and address underutilization and underrepresentation of a particular gender or race in its job groups.

**Planned Programs, Initiatives, Actions aimed at Workforce:**

- Because COIB is a tiny agency, it does not have statistically significant underutilization in any job group. Instead, the EEO Officer reviews the CEEDS report from DCAS' CEI that compares the demographics of the agency's workforce with the demographics of internal and external labor pools to check for underrepresentation of a particular gender or race in the agency's job groups. For this analysis, underrepresentation means that the number of employees in a job group who self-identify as a particular gender or race is at least two fewer than what would be expected compared to the internal and external labor pools for that job group.

- Based on the EEO Officer's review of the latest CEEDS report as of June 30, 2025, the agency has identified an underrepresentation of individuals who self-identify as female in the Paraprofessional job group. When hiring for a Paraprofessional, the agency will ensure that the job posting is shared with schools and/or organizations to attract applicants who self-identify as female. The EEO Officer will review the demographics of applicants to assess whether the agency's recruitment efforts are yielding a sufficiently diverse applicant pool or if additional recruitment efforts are needed.
- During most of FY 2024, the CEEDS reports showed an underrepresentation of individuals who self-identify as Black in the Managers job group. However, since the number of individuals in the Managers job group recently decreased, the latest CEEDS report from June 30, 2025, shows the number of employees in the Managers job group who self-identify as Black as only one fewer than what would be expected compared to the labor pools for that job group. Nevertheless, because none of the individuals in the Managers job group self-identify as Black, it is the agency's goal to improve the representation of those who self-identify as Black in the Managers job group. When hiring for a position in the Managers job group or for a position where there is the possibility of promotion to the Managers job group, the agency will ensure that the job posting is shared with schools and/or organizations to attract applicants who self-identify as Black. The EEO Officer will review the demographics of applicants to assess whether the agency's recruitment efforts are yielding a sufficiently diverse applicant pool or if additional recruitment efforts are needed.
- When an employee separates from the agency, the EEO Officer conducts an exit interview to gather information about why the employee is leaving. The EEO Officer reviews this information and the demographics of separating employees for any possible patterns.
- The EEO Officer, Agency Head, Agency Personnel Officer/Human Resources Director, and General Counsel meet annually to discuss workforce composition; demographic trends to be considered when making decisions about recruitment, hiring, promotions, and attrition; and potential workplace barriers that may contribute to underrepresentation.
- To help develop and retain employees, the agency has a Non-Managerial Staff Incentive Program to recognize and reward Staff who perform above and beyond.

## **B. WORKPLACE**

**State your Agency's general goals and strategies to enhance DEI and EEO aimed to enhance your agency workplace and cultural environment.**



- To foster an environment that respects and promotes diversity, equity, and inclusion and is free from all forms of discrimination and harassment prohibited by the City's EEO Policy.

**Planned Programs, Initiatives, Actions aimed at Workplace:**

- The EEO Officer will continue to distribute annually the agency's EEO Policy Statement and EEO Policy, which includes the City's EEO Policy Handbook, to all employees by email. COIB's EEO Policy is also posted on COIB's intranet and on a bulletin board in the office kitchen.
- The EEO Officer will continue to distribute annually the DCAS EEO Complaint Procedural Guidelines, EEO Complaint Process at a Glance, and Reasonable Accommodations Procedural Guidelines to all employees by email.
- The agency will periodically hold agencywide events where all employees have a chance to interact with one another.
- When an employee separates from the agency, the EEO Officer conducts an exit interview to gather information about the workplace environment.
- The Agency Head sends emails to all employees in connection with heritage months and City holidays to educate employees about the history of the month or holiday and provide information about ways to celebrate and resources to learn more.
- Because COIB is a tiny agency, there are limited resources and limited staff for Employee Resource Groups, a Diversity Council, and/or diversity programming within the agency. The EEO Officer and Human Resources Director will continue their efforts to identify equity and inclusion programs at other City agencies and explore the possibility of including COIB staff in those programs.

Please select below the options that apply to your agency.

- ☐ Promote employee involvement by supporting Employee Resource Groups (ERGs).  
List below the names of existing ERGs:

1.

2.

- ☒ Agency does not presently have any ERGs.

- ☐ Agency will create and leverage equity and inclusion programs through its Diversity and Inclusion Officer and/or a Diversity Committee

- ☐ Agency has an active Diversity Committee/Council
- ☐ Agency will sponsor focus groups, Town Halls and learning events on race, equity, and inclusion
- ☒ Agency will continue to fulfill its obligation to 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 and EQUITY, INCLUSION and ANTI-RACISM**

**State your Agency's general goals and strategies to enhance DEI and EEO in areas of Community and Anti-Racism.**

- Promote diversity and inclusion in its interactions with the public.
- Provide COIB staff with information about programs, resources, and activities to learn more about different demographic groups and participate in events with affinity groups that have similar backgrounds or interests.

**Planned Programs, Initiatives, Actions aimed at Community, Equity and Anti-Racism:**

- To the extent feasible, the agency will continue to utilize a minority-owned business to provide services at the workplace.
- The agency includes diverse representation in the graphics on its website and educational materials.
- The EEO Officer and Human Resources Director will continue to work on identifying programming aimed at enhancing equity and race relations that is available to all City employees with the goal of promoting those programs to COIB staff.

In FY 2026, 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)
- ☐ Expand language services for the public

## VI. Recruitment

### A. Recruitment Efforts

- The EEO Officer and Human Resources Department have developed a general recruitment plan to ensure that job postings for open positions are shared with an extensive list of recruitment sources (to the extent feasible within the agency's budget) that were identified based on agency's past research and outreach. As the agency identifies new recruitment sources, they are added to the plan.
- When there is an open position in a job group with underrepresentation or an open position with the possibility of promotion to a job group with underrepresentation, the EEO Officer and Human Resources Department will ensure that the agency's recruitment sources target a large pool of applicants to increase the diversity of potential candidates and include schools and/or organizations to attract applicants of the underrepresented gender or race. The EEO Officer will review the demographics of applicants to assess whether the agency's recruitment sources are yielding sufficiently large and diverse applicant pools. Based on the results of that review, the EEO Officer may suggest expanding the agency's recruitment sources to target members of an underrepresented gender or race for a specific position.
- With guidance from the EEO Officer, the hiring manager develops a standard set of interview questions for each open position to be used during interviews. The agency's standard set of interview questions includes a question about how candidates learned of the position so that the EEO Officer may better assess whether its various recruitment sources being utilized are yielding sufficiently large and diverse applicant pools.

### B. Recruitment for Civil Service Exams

List any planned recruitment events for FY 2026 that will be held by the agency to promote open-competitive civil service examinations.

Event Date	Event Name	Borough
None	N/A	N/A

List planned expenditures for FY 2026 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
Other (include online)	\$0

## **C. Recruitment Sources**

1. Job boards such as Indeed, the Public Service Jobs Directory, the Network of Bar Leaders, and the New York State Job Bank. The agency works to reach a larger pool of applicants to increase the diversity of potential candidates. These sources have resulted in previous hires.

2. College and law schools, including historically black colleges and universities (“HBCUs”). The agency works to reach a larger pool of applicants to increase the diversity of potential candidates and added HCBUs to its list of schools to reach more minority group members. These sources have resulted in previous hires.

3. Regional bar associations, such as the New York City Bar Association, as well as affinity bar associations, such as the Metropolitan Black Bar Association, National Native American Bar Association, New Jersey Muslim Lawyers Association, and New Jersey Women Lawyers Association. The agency works to reach a larger pool of applicants as well as minority group members to increase the diversity of its potential candidates. These sources have not resulted in previous hires.

4. Emails to contacts in City government, including emails to minority group members, to Agency Personnel Officers at other City agencies, and to the DCAS Office of Citywide Recruitment (OCR), to inform them of job openings and encourage them to share job postings with potential candidates. The agency works to reach a larger pool of applicants as well as minority group members to increase the diversity of its potential candidates. This source has resulted in previous hires.

5. Social media such as LinkedIn. The agency works to reach a larger pool of applicants to increase the diversity of potential candidates. These sources have not resulted in previous hires.

6. The Mayor’s Office for People with Disabilities and ACCES VR. The agency works to reach a larger pool of applicants, including those with disabilities, to increase the diversity of its potential candidates. These sources have not resulted in previous hires.

## D. Internships and Fellowships

Because COIB is a tiny agency with limited staff to supervise the work of an intern or fellow, it does not always offer internship or fellowship opportunities. Due to circumstances specific to FY 2025, the agency was able to host two law school students for summer internships.

The agency provided the following internship opportunities in FY 2025:

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. Civil Service Pathways Fellows			M __ F__ Non-Binary __ Other __ Unknown
6. Other (specify): Summer Law School Interns	2	Unknown	M __ F__ Non-Binary __ Other __ Unknown <u>X</u>

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

- ☒ 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.

## **VII. Selection (Hiring and Promotion)**

### **A. Career Counselors**

The Career Counselor circulates information to all employees about civil service examinations and job vacancies at other City agencies. The Career Counselor encourages employees to take promotional civil service examinations where appropriate and is available to assist Staff with job applications. Because COIB is a tiny agency, all employees know almost immediately when there is an opportunity for promotion at the agency.

### **B. New Hires and Promotions**

Because COIB is a tiny agency, the procedures for selections and promotions are reviewed by the Agency Head, Agency Personnel Officer/Human Resources Director, EEO Officer, and General Counsel each time there is a job vacancy. While promotions are limited, the agency's managers assign a broad range of work and provide regular, specific feedback to help employees develop the skills necessary to be eligible for a promotion when a position becomes available. In addition, Staff frequently work collaboratively between units, giving them the opportunity to consider open positions in other units.

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

In FY 2026, the agency EEO Officer will do the following:

- ☒ Ensure that all vacancy announcements include the revised NYC EEO Anti-Discrimination Statement.
- ☒ Be available for consultation on 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 as well as language that is age-inclusive).
- ☐ Refer hiring managers to Structured Interviewing and Unconscious Bias training.
- ☒ Collaborate with Human Resources to review workforce metrics that inform broader outreach in recruitment efforts 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 for an interview.
- ☐ 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 and/or SmartRecruiter 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: The EEO Officer will attend a Structured Interview & Unconscious Bias training and will utilize the key principles from that training to assist hiring managers in developing an interview process that is tailored to the staffing needs of the agency if and when the agency receives authorization from the City's Office of Management and Budget to fill personnel vacancies..

The agency's hiring managers keep an internal Applicant Interview Log for each job vacancy to track recruitment sources and the outcome of the hiring process so that the EEO Officer can use this information to assess recruitment sources. Additionally, the EEO Officer tracks the application-to-hiring lifecycle for each job vacancy and uses the NYCAPS Applicant Demographic report to assess the demographics of all applicants compared to the demographics of those selected for interviews, hiring, and promotions. The EEO Officer reviews this information ahead of the agency's annual workforce meeting for demographic trends and potential structural barriers to hiring and/or promotions.

#### **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?

- ☒ 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 2026.
- ☒ The agency will analyze the impact of layoffs or terminations on racial, ethnic, gender, age groups, and people with disabilities.
- ☒ Where layoffs or terminations would have a disproportionate impact on any protected category 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).

## VIII. Training

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 – Annually (Cycle 3 must be completed by June 30, 2026.)	22	January 2025
2. Everybody Matters: EEO and Diversity & Inclusion Training for NYC Employees (classroom/live webinar)	All employees – Annually (Cycle 3 must be completed by June 30, 2026.)	N/A (all e-learning)	
3. Sexual Harassment Prevention (e-learning)	All employees – Annually (Cycle 8 runs between September 1, 2025 – August 31, 2026)	22	May 2025
4. Sexual Harassment Prevention (classroom/live webinar)	All employees – Annually (Cycle 8 runs between September 1, 2025 – August 31, 2026)	N/A (all e-learning)	
5. IgbTq – Power of Inclusion (e-learning)	Managers, Supervisors, and Front-line employees (must be completed by March 31, 2026) All other employees	22	September 2025
6. IgbTq – Power of Inclusion (classroom/live webinar)	Managers, Supervisors, and Front-line employees (must be completed by March 31, 2026) All other employees	N/A (all e-learning)	
7. Disability Awareness and Etiquette			
8. Structured Interviewing and Unconscious Bias (classroom/live webinar)			



9. Other (specify)			
10. Other (specify)			

## IX. 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 any undue hardship, the agency provides reasonable accommodations for disability; religious observances; victims of domestic violence, sex offenses and stalking; and pregnancy, childbirth, or related medical conditions.
- ☒ The agency follows the City's Reasonable Accommodation Procedure.
- ☒ The agency adheres to the City's Reasonable Accommodation Procedural Guidelines published in July 2024.
- ☒ The agency initiates the cooperative dialogue within 10 days from notice of a Reasonable Accommodation need or request.
- ☒ The agency sends a written reminder to the individual at least 10 business days before an accommodation is set to expire.
- ☒ The agency issues a written notice of any decision granting or denying an accommodation and all appeal rights within 15 days from the conclusion of the cooperative dialogue.
- ☒ When necessary, in certain time-sensitive circumstances the agency conducts an expedited review and grants or denies request in less than 15 days.
- ☒ The Agency Head or designee reviews and grant or deny issues a written determination on appeals within I fifteen (15) business days after submission of the appeal.
- ☐ If the review and decision on appeal is not done by the Agency Head.  
Provide the name and title of the Agency Head's designee<sup>3</sup> : \_\_\_\_\_
- ☐ The designee reports directly to the Agency Head.
- ☒ The agency enters all the Reasonable Accommodation requests and determinations in the DCAS Citywide Complaint and Reasonable Accommodation (CAD) Database and updates the information as needed.

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<sup>3</sup> To avoid conflicts of interest, the EEO Officer or General Counsel cannot be designated to review appeals of reasonable accommodation decisions.

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

### **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 7 – September 1, 2025 – August 31, 2026) 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; Local Law 14 (2024): Anti-racism and Anti-racial 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 3: July 1, 2025 – June 30, 2026) as indicated in the Section VIII 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.

Select the types of accommodations that your agency has provided to your workforce in FY 2025.

- ☐ 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 2026**

- ☒ List of diversity and inclusion training for FY 2026 is included in section VII of this annual plan.

**F. Local Law 27 (2023): Workforce Information Report for FY 2025**

- ☒ The agency will submit the mandated annual report with workforce information to the Mayor, the Speaker of the Council, the Department of Citywide Administrative Services, and the Equal Employment Practices Commission by September 30, 2025.

**G. Local Law 28 of (2023): Diverse Recruitment and Retention in City Government**

Under Local Law 28 (2023), agencies must provide information about agency-specific training programs that are required for, or relevant to, an applicant's appointment to a position based on an open-competitive or promotional civil service examination. Additionally, agencies must provide information on expenditures related to recruiting candidates for open competitive and promotional civil service examinations, a list of recruiting events to promote open-competitive civil service examination and a list of any preparatory materials developed for applicants or potential applicants for open-competitive and promotional civil service examinations. The deadline for submission of this information is the same as for the submission of the Annual Plan].

- ☒ The agency submitted all information required by Local Law 28 for FY 2025 using the form and templates provided.

**H. 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 5 runs from April 1, 2024, to March 31, 2026.

- ☒ 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 second year of the training cycle, 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 single-sex facility (e.g., 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.

## **XI. Audits and Corrective Measures**

- ☒ The agency is NOT currently subject of an audit conducted by NYC Equal Employment Practices Commission (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 CEI an amendment letter, which shall amend the agency plan for FY 2025 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.]

## **XII. Agency Head Affirmation and Signature**

This annual Diversity, Equity, Inclusion and Equal Employment Opportunity Plan ("EEO Plan") is hereby submitted and adopted for implementation pursuant to New York City Charter §815(a)(19)<sup>4</sup>

In addition, pursuant to New York City Charter § 815(i), the agency will submit quarterly reports reflecting the agency's efforts during the previous quarter to implement the agency's EEO Plan.

CAROLYN LISA MILLER

Print Name of Agency Head



Signature of Agency Head

11.24.25

Date

<sup>4</sup> Agencies shall file copies of their finalized EEO Plans with the Mayor, City Council, Equal Employment Practices Commission (EEPC), and City Civil Service Commission, and make EEO Plans available for reasonable public inspection.

## Appendix A: Contact Information for Agency EEO Personnel and Career Counselors\*

**Agency EEO Office mailing address:** 2 Lafayette Street, New York, New York 10016

	Title/Function	Name	Email	Telephone
1.	<b>Agency EEO Officer</b> [indicate if 'Acting' or 'Interim']	Katherine J. Miller, Director of Annual Disclosure & Special Counsel	<a href="mailto:kmiller@coib.nyc.gov">kmiller@coib.nyc.gov</a>	(212) 437-0730
2.	<b>Agency Deputy EEO Officer</b> [if appointed]	None		
3.	<b>Agency (Chief) Diversity &amp; Inclusion Officer</b> [if appointed]	None		
4.	<b>Chief Diversity Officer/Chief MWBE Officer per E.O. 59</b>	Tasnia Karim, Director of Administration	<a href="mailto:karim@coib.nyc.gov">karim@coib.nyc.gov</a>	(212) 437-0750
5.	<b>ADA Coordinator</b>	Katherine J. Miller		
6.	<b>Disability Rights Coordinator</b>	Katherine J. Miller		
7.	<b>Disability Services Facilitator</b>	Tasnia Karim		
8.	<b>55-a Coordinator</b>	Tasnia Karim		
9.	<b>EEO Investigator(s)</b>	Katherine J. Miller		
10.	<b>EEO Counselor(s)</b>	Alex Kipp, Director of Education & Engagement  Maryann White, Associate Attorney	<a href="mailto:kipp@coib.nyc.gov">kipp@coib.nyc.gov</a>  <a href="mailto:white@coib.nyc.gov">white@coib.nyc.gov</a>	(212) 437-0770  (212) 437-0727
11.	<b>EEO Training Liaison(s)</b>	Katherine J. Miller		
12.	<b>Career Counselor(s)*</b>	Tasnia Karim		