



New York City Campaign Finance Board
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Diversity, Equity, Inclusion and Equal Employment Opportunity (DEI-EEO) Plan Fiscal Year 2023



New York City Campaign Finance Board

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I. Commitment and Accountability Statement by the Agency Head

Dear Staff:

On behalf of the NYC Campaign Finance Board (CFB), I hereby declare my commitment as the Agency Head to support and enforce the rights and protections afforded by the New York City EEO Policy, the NYC and NY State Human Rights Laws, and all other relevant laws, for all employees, applicants for employment, external contractors, consultants, agency partners, and members of the public served by our Agency.

The CFB and I are deeply committed to creating and sustaining a diverse workplace where employment decisions are made based on merit and equality of opportunity. The agency, under my leadership, will strive to achieve the greatest possible diversity among our workforce, to create an inclusive culture of openness, acceptance, and cooperation in our workplaces, to promote equity in all its aspects, and to examine and eliminate the structural obstacles to equal treatment in the recruitment, selection, development, advancement, and retention of our diverse workforce reflective of our City's population. I will aim to ensure that all our staff and those our agency serves feel empowered, valued, and respected and to address potential barriers to our EEO and diversity and inclusion goals head-on.

I will involve my entire leadership team in our efforts to enhance and promote the values of equity, inclusion, and respect for all. All Agency supervisors will be responsible for ensuring a safe, equitable and inclusive work environment for all our employees, and for delivering equitable, fair, and effective services to the public we serve – and this is mandated in each of our supervisors' Key Responsibilities.

I will hold all CFB employees accountable, especially the top leadership of our agency, EEO Officer, EEO Counselors, human resources professionals, legal professionals, managers, and supervisors, for ensuring that the agency does not discriminate against employees or applicants for employment and support the diversity and inclusion initiatives at the agency by adhering to EEO regulations and actively working toward attaining agency goals in that area. Everyone at the CFB is accountable for complying with the City's EEO Policy and play a part in the effective implementation of the agency's Diversity and EEO Plan for FY2023.

I will involve the EEO Officer in critical human resources decisions, including recruitment and selection strategies, workforce projections, succession planning, promotion of training/career development opportunities, and strategic planning. The EEO Officer will serve as the primary resource for managers and supervisors by providing best practices and direction in addressing EEO issues. The EEO Officer's contact information will be prominently available to all employees.

We will report to DCAS on the steps undertaken to comply with all legal mandates and the provisions of the various Executive Orders and laws prohibiting employment discrimination in New York City, and on the progress in implementing this Plan.

The Agency EEO Officer Kirann Nesbit will serve as the primary resource for managers and supervisors by providing best practices and direction in addressing EEO issues. Their contact information will be prominently available to all employees.

Each September, I will issue a Commitment Statement to all CFB employees affirming the principles of diversity, inclusion, and equal employment opportunity. The statement is intended to guide managers and supervisors and to communicate to all staff everyone's responsibilities contributing to the agency's overall dedication to equity, diversity, inclusion, and related values for all employees. The EEO and Sexual Harassment Prevention Policy Statements and Statement of Commitment from Fiscal Year 2021 are attached to this Diversity and Equal Employment Opportunity Plan as a reference.

This statement is the same as last year.

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

****Please note that the current agency head is retiring from service effective October 2022. CFB's EEO Officer will work with the new agency head to draft a new Commitment and Accountability Statement. Upon creation, the new statement will be promptly disseminated to all staff.***

II. Recognition and Accomplishments

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

1. Drafted, edited, finalized, and published Executive Director statements relating to major news events concerning race, diversity, equity, or bias to support CFB staff

Statements are typically drafted by the EEO Officer when a hate-based incident occurs and is in the news. These statements are then reviewed and approved by the Executive Director. The Executive Director posts the statement on staff channels through Microsoft Teams so that staff of all levels can react and respond to the statement. This is done to provide staff with resources for coping should they need, create a sense of cohesiveness, and communicate to staff that hate of any kind is unwelcome in their workplace. Statements have included content regarding Black Lives Matter, violence against Asian Americans, statements of solidarity with the LGBTQ+ community, etc.

2. Reconstituted our diversity and inclusion committee and EEO intranet pages

3. Rolled out mandatory EEO training for all staff

4. Created an "equity" sub-committee for our strategic planning group

5. Hired a full time EEO Officer that is solely dedicated to advancing the agency's DEI and EEO goals.

6. Updated our intranet calendars to include dates relating to diversity and inclusion (e.g., holidays, cultural milestones)

7. Strengthened Efforts to Encourage Civic Engagement with Youth, Immigrant, and Other Underserved NYC Communities

8. Strengthened Measures to Increase Accessibility

In FY 2022, the CFB continued discussing plans to update its main website to incorporate feedback from the MOPD on how to make the information more accessible in accordance with the Web Content Accessibility Guidelines (WCAG) and also to identify other public electronic content that might be able to be improved under those guidelines. Additionally, the EEO Officer has started to research accessibility partners and tools that can be used to further improve our website(s).

The EEO Officer participates in monthly meetings with MOPD in order to stay abreast of any additional accessibility-related issues, laws, policies, or resources that might be relevant to the agency.

In FY 2022, the CFB also hired a Language Access Manager for Marketing and Digital Communications and have plans to hire a Language Access Specialist in FY 2023.

9. Took Proactive Measures to Utilize MWBEs.

Although the CFB is a non-mayoral agency and therefore exempt from the City's MWBE (minority/women owned business enterprise) goalsetting requirements, the CFB recognizes the importance of utilizing MWBE certified vendors and has continued to take proactive measures to utilize these vendors. The CFB firmly believes that MWBEs are businesses that contribute greatly to and drive our City's economy and use of their goods and services should be properly reflected in government contracting, including at the CFB. As such, the agency adheres to the practice of including MWBE certified vendors in all CFB solicitations, reaching out to more than the number of MWBEs recommended by DCAS. During FY'22, the CFB hired a new Agency Chief Contracting Officer who is versed in MWBE rules/regulations and actively applies them to the CFB's practices.

III. Workforce Review and Analysis

Please provide the total agency headcount as of 6/30/2022

Total Headcount: 117 [This figure is available on the total line for your agency in the FY2022 Q4 EBEP210 CEEDS report]

1. In FY 2023, 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 2023, the agency will inform and remind employees of the option to add preferred name in ESS.

The HR Director will also send all-staff emails reminding employees to update self-ID information regarding race/ethnicity, gender, and veteran status through either NYCAPS Employee Self Service (ESS)

2. In addition to providing demographic data and trend information to the Director of Human Resources, General Counsel, and Agency Head on a quarterly basis through the EEO quarterly report review process, the EEO Officer and Agency Head separately meet on a quarterly basis to review any potential issues regarding dashboard-related data, potential workplace barriers that may arise in underutilization reports, and other EEO-related issues.

[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 (___ specify)

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 2023

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

❖ Workforce:

The CFB is only as strong as our workforce and the support that we provide to them. We are absolutely committed to recruiting, developing, and retaining a diverse and inclusive workforce which reflects our core principles of equity and the communities of our great City. Please refer to section 2 for strategies and details.

❖ Workplace:

When our employees think of the CFB, we want them to be proud of the work that they do, the people they work with and the culture that we promote. To achieve this goal, we strive to create a space that encourages diversity, promotes inclusion, and values the experiences and backgrounds of each and every one of our colleagues. Please refer to section 2 for strategies and details.

❖ Community:

The work at the CFB is central to ensuring our communities have voices that reflect that of our residents. From our Campaign Finance program to our NYC Votes voter outreach program, communication with and learning from our communities ensure we have the best possible programs we can offer in service to New Yorkers. Please refer to section 2 for strategies and details.

2. Planned Programs, Initiatives, Actions

The planned programs, initiatives, and actions for FY' 23's EEO plan rely heavily on staff feedback and cooperative work from the CFB's EEO officer, EEO Counselors, Executive Staff, and Diversity and Inclusion committee.
Please note that that our Director of HR position is vacant.

A. Workforce

Please refer to Sections V and VI for this information.

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.).]

During FY'23, the CFB plans to do the following to increase inclusion within our workplace:

- Encourage staff at all levels, but especially executive staff and unit heads to start workplace introductory meetings by announcing their pronouns. “Hi, my name is _____. I’m the [insert title] of [insert unit]. My pronouns are ____/____.”
 - Post and disseminate information graphics to reinforce and model inclusive language
 - Staff will also be strongly encouraged to use their pronouns in their email signatures and will be offered the option to attach their pronouns to their intranet employee profile.
- Require new staff to take DCAS EEO trainings within thirty days of the start of their employment
- Engage a pay equity company to conduct a pay equity analysis on our workforce to ensure pay parity
- Create a training with the DEI Committee focused on what to do if one witnesses a colleague being misgendered in the workplace
- Request that DCAS hold microaggression training sessions at the CFB
- Make our web platforms WCAG 2.0 and ADA accessible/compliant
- Develop trainings on EEO for managers
- Develop/enroll the workforce in unconscious bias training
- Develop a workplace training on neurodiversity in the workplace
- Work with HR to develop a new manager or supervisor training curriculum including:
 - Civil Service 101
 - Difficult Conversations
 - Fundamentals of Management

- Stress Management/Coping Skills
- Identifying Needs and Developing Staff
- Hold diversity and inclusion celebrations or commemorations/acknowledgements of events including but not limited to:

Rosh Hashanah
 Yom Kippur
 Dia de Los Muertos
 Black History Month
 Lunar New Year
 AAPI Month
 Pride Month
 Women's History

- Hold DEI Committee meetings regularly (at least once a quarter)

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

- The CFB will continue to release statements related to equity, inclusion, and race relations
- The CFB releases a monthly diversity calendar noting observances, holidays, and significant cultural markers
- The CFB sends flyers to all staff that include explanations of specific holidays or observances listed on the diversity calendar
- The CFB will hold a Black History Month event (February 2023), a DEI Committee event in November 2022 (theme to be determined) and will be looking to hold events or disseminate material celebrating our diverse workforce with events and initiatives concerning neurodiversity in the workplace, AAPI employees, LGBTQ+ employees, etc.
- The CFB will be actively researching ways to bring staff discussions about equity, inclusion, and race relations into the workplace

[Select the options that apply to your agency.]

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

At this time, there are no active ERG's. The CFB recently hired an EEO/DEI Officer during Q4 of FY 22. The EEO/DEI Officer plans to survey employees to gauge their interest in the following ERG's:

1. Caretaker Resource Group
2. Women Employee Group
3. LGBTQIA+ Employee Group

4. Latino/a/x/e/ Employee Group

5. Black Employee Group

6. AAPI Employee Group

Additionally, the CFB is planning currently holding strategic planning meetings focused on equity and has equity-focused plans to launch a mentorship and employee survey program with the purpose of fostering inclusion and diversity at work.

- 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

CFB will continue to encourage civic engagement with youth and in immigrant and other underserved communities. In the past, the agency conducted voter registration drives, coordinated youth-centered events, targeted messaging toward youth subgroups (including NYC-native voters, students attending college in NYC, and post-college voters who move to NYC for their first job), translated additional materials into target languages, created more culturally relevant materials, and built more strategic partnerships to ensure that diverse communities are empowered with access to voting resources. The CFB's commitment to promoting civic engagement in NYC's underserved communities remains firmly in place for FY2023 as a key component of the agency's work.

A central goal for the Campaign Finance Board is to make all aspects of city elections accessible to every voter. This goal includes the community of people with disabilities in New York City. This fiscal year, the CFB wants to expand upon its recent work to improve accessibility to its programs and services by targeting ways to improve its written and recorded materials, as well as for live events.

In FY 2023, 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

During FY'23, the CFB plans to do the following to increase inclusion within our workforce, recruitment, retention, promotion, and professional development:

- EEO, General Counsel, HR and the agency head will review recruitment sources to see which sources need be updated, added, deleted, or modified to ensure diverse hiring practices
- The agency will continue to regularly analyze the composition of its workforce, as well as demographic information provided by job applicants and staff selected for promotion, to understand how that information might influence certain practices and programs adopted by the agency.
- Announce internal vacancies to all staff via email to ensure all qualified candidates have an opportunity to be considered for advancement
- Ensure staff have an opportunity to meet with the career counselor (head of HR) to discuss potential avenues of professional development and advancement.
- The Career Counselor will send all-staff emails announcing available time slots to meet either virtually or in-person.
- Interview qualified internal candidates for promotional opportunities
- Work with HR to create succession plans for various positions
- Encourage dialogue between hiring managers, Human Resources and EEO if an internal candidate does not receive a promotion through an internal vacancy. The dialogue will potentially include reasons why the employee was not selected, and methods or strategies employee may be able to adopt in order to be considered for another position in the future (i.e., training, certificates, education, experience)
- Announce and promote upcoming civil service tests
- Apprise staff of professional development opportunities

- The agency will continue to support the professional development of its staff by paying for approved courses that are relevant to an employee's work at the agency and meets the requirements of the Comptroller's Directives.
- Request that members of Diversity and Inclusion committee research additional diverse recruiting sources
- Require that hiring managers take Unconscious Bias and Structured Interviewing trainings
- Additionally, the EEO Officer will work with the HR Director and other agency leadership as necessary to determine whether additional programs and policies might be implemented in FY 2023 to address the workforce, recruitment, retention, promotion, and professional development needs of the agency, including, for example, mentorship/sponsorship programs and additional trainings.

B. Recruitment Sources

1. All Diversity
2. Out and Equal
3. LGBT Connect
4. Diversity in Higher Education
5. Diversity Connect
6. Hispanic Diversity
7. Women's Job Center
8. Black Job Center
9. Veterans Connect

The recruitment websites included in the above list seek to directly address the reported underutilization of women in our Systems unit. In FY'23, the CFB will assess the recruitment information included in NYCAPS to determine if these recruitment sources are useful in addressing underutilization. Modifications will be made accordingly. Please note that the CFB started using NYCPAS e-hire effective April 2022 so previous recruitment source information was unavailable.

C. Internships/Fellowships

[Indicate the type of internship/fellowship opportunities available at your agency. Please provide the number of student interns/fellows employed in FY 2022 and their demographic profiles, based on self-ID data. Indicate your plans to provide internship/fellowship opportunities in FY 2023. 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 2022:

Type of Internship\Fellowship	Total	Race/Ethnicity *[#s] * Use self-ID data	Gender * [#s] * Use self-ID data
1. Urban Fellows	1		M __ F__ Non-Binary 1 Other __ Unknown __
2. Public Service Corps	N/A		M __ F__ Non-Binary __ Other __ Unknown __
3. Summer College Interns	N/A		M __ F__ Non-Binary __ Other __ Unknown __
4. Summer Graduate Interns	3	Asian (1) White (2)	M _1_ F_2_ Non-Binary __ Other __ Unknown __
5. Other (specify): We Power NYC Youth Ambassadors (q1 only)	14	Asian (5), White (3), Black (2), Hispanic/Latinx (1), 2+ races (2), undisclosed (1)	M __3 F_9_ Non-Binary __ Other __ Unknown _2_

D. 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.
- 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.

VI. Selection (Hiring and Promotion)

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

A. Career Counselors

The Agency Career Counselor (the HR Director) will meet with employees, as requested, to discuss career development options and opportunities.

This individual will also send all-staff emails which will include information concerning civil service tests and internal vacancies.

In addition, the agency career counselor will inform staff of training and professional development opportunities as they occur.

The Director of HR will work with the strategic planning committee to plan an employee mentorship/shadowing program.

B. New Hires and Promotions

The CFB is currently in the process of finalizing our hiring, promotion and salary increase policies. Our procedures have undergone intense assessment and revision over the course of FY'22 and we look forward to implementing them during FY' 23. The review and revision of our procedures included focus groups with executive staff and unit heads, feedback from staff of all levels and an understanding of current best practices throughout other City agencies.

The EEO Officer or EEO Counselors sit in on at least one stage of every open position at the CFB to monitor the fairness of the selection and appointment process and to ensure nothing discriminatory is done or said by any representative of the CFB during the selection process and to ensure candidates are being evaluated solely on the merit of their work and not through the lens of unconscious bias (to the extent possible).

Before and during all interviews, all candidates are made aware of their ability to contact the EEO Office for an accommodation or if they have any EEO-related concerns.

Hiring managers are required to submit hiring packets that include a hiring plan, resumes, and justifications for their selections. The justification often includes a comprehensive explanation on why hiring managers selected the candidates they did. In FY'23, the CFB plans on implementing the use of the NYCAPS hiring log to explain why the rejected candidates were not selected to remain as transparent and fair as possible.

The information provided by NYCAPS in conjunction with feedback from candidates and new employees will help us in assessing and identifying what, if any, structural barriers to employment exist.

C. EEO Role in Hiring and Selection Process

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

In FY 2023, the agency EEO Officer will do the following:

- Ensure that all vacancy announcements include the revised NYC EEO I Anti-Discrimination Statement.
- EEO Officer reviews 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).
- EEO Officer and Human Resources Director along with Agency head 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. (Done by EEO Officer post-selection)
- 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?

In the event of layoffs, terminations, and demotions due to legitimate business/operational reasons, the Office of EEO, in conjunction with the agency head, Human Resources and the Office of General Counsel (with guidance and input from the Law Department) will use demographic data generated by NYCAPS along with virtual or in-person meetings to discuss the impact that the employment actions would have on the aforementioned groups prior to finalizing any actions. CFB plans on utilizing the DCAS Layoff Procedure.

- 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 2023.
- 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 1 must be completed by March 31, 2023.)	117	7/16/2022
2. Everybody Matters: EEO and Diversity & Inclusion Training for NYC Employees (classroom/live webinar)	All employees – Biennially (Cycle 1 must be completed by March 31, 2023.)	117	7/16/2022
3. Sexual Harassment Prevention (e-learning)	All employees – Annually (Cycle 5 runs between September 1, 2022 – August 31, 2023)	117	7/16/2022
4. Sexual Harassment Prevention (classroom/live webinar)	All employees – Annually (Cycle 5 runs between		

	September 1, 2022 – August 31, 2023)		
5. lgbTq – Power of Inclusion (e-learning)	Managers, Supervisors, and Front-line employees All other employees	117	7/16/2022
6. lgbTq – Power of Inclusion (classroom/live webinar)	Managers, Supervisors, and Front-line employees All other employees		
7. Disability Awareness and Etiquette		117	7/16/2022
8. Structured Interviewing and Unconscious Bias (classroom/live webinar)	Managers and supervisors	50	06/30/23
9. Other (specify)			
10. Other (specify)			

VIII. Reasonable Accommodation

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

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

- Managers, supervisors, human resources personnel and discipline personnel are required to report to the EEO Office any reasonable accommodation requests and needs that are received, observed, learned about, or suspected, so that the EEO Office may facilitate discussions, research appropriate accommodations, and assist with the resolution of the matter.
- Absent of any undue hardship, the agency provides reasonable accommodation for disability, religion, victims of domestic violence, sex offense and stalking, pregnancy, childbirth, or a related medical condition.
- The agency follows the City’s Reasonable Accommodation Procedure.
- The agency grants or denies request 30 days after submission or as soon as possible.

- The Agency Head or designee must review and grant or deny an appeal fifteen (15) days after submission of appeal.
- If the review and decision on appeal is not done by the Agency Head.
Provide the name and title of the designee¹ : _____
- The designee reports directly to the Agency Head.
- The agency will input the Reasonable Accommodation activity on the DCAS Citywide Complaint and Reasonable Accommodation (CAD) Database and update the information as needed.

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

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

- The agency plans to train all new employees on Sexual Harassment Prevention within 30 days of start date.
- The agency will train all current employees on Sexual Harassment Prevention (Cycle 5 – September 1, 2022 – August 31, 2023) 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

¹ 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.

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 1: April 1, 2021 – March 31, 2023) as indicated in the Section VII Training above.

D. 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 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.

E. Local Law 101 (2018): Climate Survey

[Using the template provided in Appendix B, submit a detailed action plan that address concerns and issues raised in the 2020 Workplace Climate Survey.]

[**Note:** DCAS is mandated to submit a report on Action Plans to the Mayor and the Speaker of the Council by December 31, 2022].

The agency, in collaboration with DCAS, has conducted a climate survey in 2020 and:

Analyzed the 2020 Climate Survey data provided by DCAS.

Will review or has reviewed the results of the survey with agency head and senior leadership.

Developed an action plan in consultation with agency head and senior leadership outlining the initiatives and actions that will be adopted by the agency in response to the 2020 Workplace Climate Survey data.

X. Audits and Corrective Measures

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

- The agency is NOT involved in an audit conducted by NYC EEPC or another governmental agency specific to our EEO practices.
- The agency is currently being audited or preparing responses to an audit conducted by the EEPC specific to our EEO practices. Upon forwarding our responses to the recommendations issued by the EEPC, the agency will submit to OCEI an amendment letter, which shall amend the agency plan for FY 2023 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 Please note we are awaiting our Certificate of Compliance from the EEPC. (March 2023 anticipated date of receipt)
- 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.]

Beth A. Rotman

Print Name of Agency Head



Signature of Agency Head

February 6, 2023

Date

Appendix A: Contact Information for Agency EEO Personnel

[Please provide contact information (name, title, e-mail, telephone number and full office address) 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.]

	Title/Function	Name	Email	Telephone
1.	Agency EEO Officer [indicate if 'Acting' or 'Interim']	Kirann Nesbit	KNesbit@nyccfb.info	212 409 1847
2.	Agency Deputy EEO Officer [if appointed]	N/A	N/A	N/A
3.	Agency (Chief) Diversity & Inclusion Officer [if appointed]	Kirann Nesbit	KNesbit@nyccfb.info	212 409 1847
4.	Chief Diversity Officer/Chief MWBE Officer per E.O. 59	Kirann Nesbit	KNesbit@nyccfb.info	212 409 1847
5.	ADA Coordinator	Kirann Nesbit	KNesbit@nyccfb.info	212 409 1847
6.	Disability Rights Coordinator	Kirann Nesbit	KNesbit@nyccfb.info	212 409 1847
7.	Disability Services Facilitator	Kirann Nesbit	KNesbit@nyccfb.info	212 409 1847
8.	55-a Coordinator	N/A	N/A	N/A
9.	EEO Investigator(s)	N/A	N/A	N/A
10.	Career Counselor(s)	Shanulda De Camp	SDecamp@nyccb.info	212 409 1749
11.	EEO Counselor(s)	Kyle Kennedy	KKennedy@nyccfb.info	212 409 1853
12.	EEO Counselor(s)	Rudy Castro	RCastro@nyccfb.info	212 409 1792

Appendix B: 2020 Climate Survey Action Plan

[Please provide a detailed description your agencies plan to address the target areas and objectives identified by DCAS. For each target area and objectives, include the planned actions, initiatives, programs or policies, the intended reach, and the office responsible for implementation. More than one initiative is encouraged to address a target area and objective.]

1. Target area and objective: Increase employees' familiarity with the EEO Policy.

➤ Planned actions, initiatives, programs, or policies:

The EEO Office will circulate a quarterly agency wide email including EEO resources, including the revised EEO Policy.

The EEO Officer will ensure employees can access the EEO Office and EEO Officer to ask questions about the EEO policy should they arise before, during and after all work hours.

The EEO Officer will post the EEO Policy to the intranet using links and PDFs.

The Policy will be made available in print. Employees can request the policy in accessible formats.

➤ Intended reach

All staff will have access to the policy. Few to no staff members operate without access to computers. Staff that don't have access to computers can request a printed copy of the EEO policy. Unit heads will also be encouraged to access the policy for their employees.

➤ Who will be responsible for implementing the action?

- EEO Office
- Director of Admin Operations (posting of documents to intranet)
- Human Resources
- Executive Staff

2. Target area and objective: Improve the EEO Office's visibility to the workforce.

➤ Planned actions, initiatives, programs, or policies:

The EEO Officer requested and received an updated intranet link and ensured that the EEO page was separate from the diversity and inclusion page so that all

documents are visible to staff. The EEO Officer linked the Human Resources page to EEO page so that employees are accurately routed to the EEO office.

The EEO Officer sends all-staff emails regularly and has multiple physical bulletin boards across the office that contain updated contact information.

The EEO Officer also makes verbal announcements during team meetings ensuring accessibility to the EEO Office.

EEO Counselors serve as liaisons to the EEO Office and can explain the function and existence of the EEO office to colleagues.

➤ **Intended reach**

The EEO Office should be visible to all staff. Few to no staff members operate without access to computers. Staff that don't have access to computers can contact the EEO Office using the contact information on the physical bulletin boards within the office space. The bulletin boards are in opposite spaces by exits so that all staff must pass the information on their way in and out of the office. Staff can also contact Human Resources if they have an EEO related concern. Human Resources will refer the staff member to the EEO Office.

➤ **Who will be responsible for implementing the action?**

- EEO Officer
- EEO Counselors
- Human Resources
- Unit Heads
- Executive Staff

3. Target area and objective: Improve employees' knowledge of the EEO complaint process, including where and how to file a formal complaint, and what happens after a complaint is filed.

➤ **Planned actions, initiatives, programs, or policies:**

Employees are given information concerning the EEO complaint process, including where and how to file a formal complaint, and what happens after a complaint is filed through the following actions, initiatives, programs and policies:

- New employee orientation
- EEO Trainings given to all staff
- Visual material mapping out the course of an investigation posted on physical bulletin boards and CFB's intranet
- All-staff emails sent regularly
- Verbal discussions led by the EEO Officer during all-staff meetings

- **Intended reach**
- All staff will have access to the policy. Few to no staff members operate without access to computers. Staff that don't have access to computers can request a printed copy of the EEO policy. Unit heads will also be encouraged to access the policy for their employees.
- Staff that do not have access to computers can reach out to the EEO Office via telephone or in person during business hours.
- Staff is also aware of their ability to book a floating computer desk to access a computer. No employee is denied this access.

➤ **Who will be responsible for implementing the action?**

- EEO Officer
- EEO Counselors
- Human Resources
- Unit Heads
- Executive Staff

4. Target area and objective: Increase employees' understanding of protected rights and prohibition of discrimination, including sexual harassment, in the workplace.

➤ **Planned actions, initiatives, programs, or policies:**

An all-staff email will be sent out regularly with information in plain language communicating to staff their protected rights and prohibition of discrimination, including sexual harassment.

The EEO Office will hold small group trainings explaining EEO protections to the entire workforce.

The EEO intranet page will also be updated to ensure staff have access to information concerning their protected rights.

Protected rights will be posted on physical bulletin boards within the office.

- **Intended reach** Given the nature of the work of this agency, few to no employees are left without computer access. Employees are always told during all-staff meetings that they are welcome to access the EEO Office, Officer or Counselors if they have any questions. Employees can also access floating desks if they need to reserve a computer for use. All employees are given computer credentials. Employees can also contact the EEO Officer or counselors for more information.

- **Who will be responsible for implementing the action?**
- EEO Officer
- EEO Counselors

5. Target area and objective: Improve managers' and supervisors' awareness of measures that an employee may take to report any violations under the EEO Policy, including discrimination and sexual harassment.

- **Planned actions, initiatives, programs, or policies:**
- The EEO Officer will hold EEO complaint and policy information sessions during unit head meetings to improve managers' and supervisors' awareness of measures that an employee may take to report any violations under the EEO Policy, including discrimination and sexual harassment.
- The CFB internal EEO policy notes that employees can contact the EEO Officer with any questions related to measures an employee may take to report any violations under the EEO Policy
- The EEO Officer holds one on one meetings with supervisors and managers to answer their respective questions and to inform them that they can come to the EEO Officer with any questions or concerns
- The EEO Officer has posted and disseminated the "EEO Complaint Process at a Glance" document in addition to the City's EEO Policy to all staff via email. The EEO Officer will regularly disseminate these documents so that the staff has up-to-date information.
- **Intended reach** Given the nature of the work of this agency, few to no employees are left without computer access. Employees are always told during all-staff meetings that they are welcome to access the EEO Office, Officer or Counselors if they have any questions. Employees can also access floating desks if they need to reserve a computer for use. All employees are given computer credentials. Employees can also contact the EEO Officer or counselors for more information.
- **Who will be responsible for implementing the action?**
- EEO Officer
- EEO Counselors

6. Target area and objective: Improve managers' and supervisors' knowledge of whom and where to direct employees who may want to discuss a complaint (s) under the EEO Policy.

➤ **Planned actions, initiatives, programs, or policies:**

The EEO Officer is in constant communication with managers and supervisors and is frequently encouraging them to schedule one on one meetings so that they may review complaint procedures and learn more about whom and where to direct employees who may want to discuss a complaint under the EEO policy.

The EEO Officer will also be developing an EEO training for managers and supervisors to address any questions they may have concerning whom and where to direct employees who may want to discuss a complaint under the EEO policy.

Announcements are also made during all-staff meetings so that managers and supervisors know who to contact.

➤ **Intended reach**

The intended reach is for CFB managers and supervisors. Few to no employees do not have computer access. They are also frequently made aware of their ability to contact the EEO Officer in person should the need arise before during and after work hours should the need arise.

➤ **Who will be responsible for implementing the action?**

EEO Officer
EEO Counselors
Human Resources