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

## Fiscal Year 2025

# New York City Department of Records and Information Services



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

As the Commissioner of the Department of Records and Information Services (DORIS), I remain fully committed to ensuring fair employment practices throughout the agency. The senior staff and I are familiar with the provisions and obligations set forth in both the City Charter and the City's Equal Employment Opportunity Policy ("EEOP"). We are committed to developing a diverse and inclusive workforce that reflects the City's population. I expect all managers and supervisors to actively develop work environments that respect all employees and that are based on equity and inclusion. Our goal is for employees, present and future, to view DORIS as a model employer. I am committed to ensuring that DORIS does not discriminate against employees or applicants for employment in any manner prohibited by federal, state and/or local laws. Our agency EEO program contains the following requirements: Managers and supervisors must reaffirm their commitment to the agency's EEO policy at documented staff meetings on an annual basis. They will discuss the right of employees to file EEO complaints with the Department's EEO officer and/or EEO counselors and with outside entities. All staff involved in conducting employment interviews must review structured interviewing material prepared by the Chief Citywide Equity and Inclusion Officer and the agency's EEO Officer.

All staff should be aware of the identities of the agency's EEO personnel and how to contact them.

- Johnnie Davis is the agency EEO Officer. His office is located at 31 Chambers Street, Suite 304. Her telephone number is 212-341-6036 and her email is jodavis1@records.nyc.gov.
- The agency's EEO Counselors are as follows: Michael Lorenzini, Ridhdhi Patel, Gerald Rosero, Urmi Udesh and Julie Chau. All are located at 31 Chambers Street. Michael Lorenzini visits both warehouses on a regular basis.
  - Contact information is: mlorenzini@records.nyc.gov /212-788-8576; rpatel@records.nyc.gov /212-788-8599; grosero@records.ny.gov /212-788-8610; uudeshi@records.nyc.gov / 212-788-864 and Julie Chau /212-788-8619/ wchau@records.nyc.gov.
- Naomi Pacheco, Director of Administration, who is familiar with employment opportunities, is
  the agency Career Counselor and will provide career counseling to employees who request it.
  She is also the disability rights coordinator and 55A coordinator. Her office is located at 31
  Chambers Street, Suite 304. Her telephone number is 212-788-8622 and her email is
  napacheco@records.nyc.gov. Employees interested in receiving counseling should contact her
  to make an appointment.

☐ This statement is the same as last year.	
<b>NOTE:</b> If this statement has been in use for more than $\underline{two}$ years the Agency Head should issue a revis statement.	sed
oxtimes 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 (2024) 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. If some of the accomplishments listed below are a continuation of what was included in previous Annual plans, you will need to provide a statement on how it has changed and/or developed in the past year. Add additional lines as needed.]

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

- 1 The agency launched an internal newsletter which utilizes authors from each division to highlight the activities and accomplishments in each division, spotlighting diversity, equity and inclusion outreach efforts, showcasing the agency's diverse collections and describing collaborations which are open to the public.
- 2. The agency Disability Services Facilitator has worked with the Mayor's Office of Persons with Disabilities and an agency team to create and implement our 5-year Accessibility Plan. The plan represents DORIS' commitment to ensuring access to its services for individuals with disabilities, actively identifying, preventing, and eliminating barriers to accessibility, and meeting accessibility standards while preserving the dignity and independence of persons with disabilities.
- 5. Agency leaders worked with the Mayor's Office of Racial Justice to develop our Racial Equity Plan to ensure that the agency is fostering an environment that is equitable, diverse, and inclusive.
- 6. DORIS has hired a Minority and Women Owned Business Enterprise (MWBE) Officer to continue our outreach to MWBE vendors while also maintaining our strong MWBE purchasing program.

### III. Workforce Review and Analysis

Please provide the total agency headcount as of 6/30/2024
Total Headcount:73
[This figure is available on the total line for your agency in the FY 2024 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 2024.

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 pay, responsibility, flexibility, stability, prestige, or other indicators of job desirability.

- [While DCAS will engage an external vendor to conduct a pay equity analysis of the city government workforce, 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 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.]

DORIS reviewed the salary structure of titles within the Public Records Officer series, compared existing ranges with those of comparable governmental archives and records programs. The results are shown below.

#### NYC Employees in the Public Records titles with current salary ranges

Title	No. of	Hiring Rate	Minimum	Maximum
	Employees		Salary	Salary
Public Records Aide	34	\$38,519	\$44,297	\$58,979
Public Records Officer	16	\$49,626	\$57,070	\$71,299
Associate Public Records	15	\$61,358	\$70,562	\$93,581
Officer, Level 1				
Associate Public Records		\$69,183	\$79,561	\$98,890
Officer, Level 2				

There is a wide disparity between the salaries of New York City employees in Public Record Officer titles and those employed by the New York State Archives and the National Archives and Records Administration (NARA), performing similar functions. The charts below (which exclude management titles) demonstrate the disparity.

#### National Archives and Records Administration Salary Plan for NY-NJ-CT-PA

Title	Grades	Minimum Salary	Maximum Salary
Archives Technician	GS5 – GS7	\$46,494	\$74,874
Archives Specialist	GS 9 - GS 11	\$70,448	\$110,803

Archivist	GS 11 – GS 12	\$85,236	\$132,807
	Į.		

#### New York State Archives and Records Management Specialist Salary Plan

Title	Grade	Minimum Salary	Maximum Salary
Archives and records management Specialist 1*	14	\$52,198	\$66,634
Archives and records management Specialist 2	18	\$65,001	\$82,656
Archives and records management Specialist 3	23	\$84,156	\$106,454
Archives and records management Specialist 4	26	\$98,456	\$121,360

<sup>\*</sup>New York State no longer uses this title

DORIS develop a proposal to achieve parity in salaries which is shown below. We submitted it to the Office of Labor Relations (OLR). The proposal falls within the equity funding included in the most recent collective bargaining agreement with District Council 37.

#### **DORIS Pay Equity Proposal**

Title	Minimum Salary	Maximum Salary
Public Records Aide	\$48,726	\$66,634
Public Records Officer	\$62,777	\$82,656
Associate Public Records Officer-1	\$77,618	\$106,454
Associate Public Records Officer -2	\$87,515	\$121,360

- What our organization finds commonly is an underutilization of African American workers in the <u>archives</u>, library and records management job categories. This is a historical matter which libraries have been tackling for several years on the local and national level.
- DORIS is working diligently with outside organizations to develop a pipeline of talent from more minority communities including African Americans.
- [Describe steps taken to encourage all employees at your agency to update self-ID information regarding race/ethnicity, gender, and veteran status through either NYCAPS Employee Self Service (ESS) or other means.]

In FY 2025, the agency will remind and encourage its employees quarterly to update self-ID information regarding race/ethnicity, gender, and veteran status through any of the following means:

□ Agency's intranet site
☑ In FY 2025, the agency will inform and remind employees of the option to add preferred name in ESS.
Below please provide the number of employees in your agency whose demographic information is unknown (these numbers are available on the total line of CEEDS report EBEPR210).
Unknown Race/Ethnicity2 Unknown Gender0 Unknown Both
[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
<ul><li>☑ Quarterly ☐ Semi-Annually ☐ Annually ☐ Other</li><li>General Counsel</li></ul>
General Counsel
General Counsel  ☐ 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 2025

[State below the goals of your strategy for FY 2025 and programs 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.]

#### A. WORKFORCE

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

[Workforce goals should be directed at the composition of your workforce, recruitment, retention, promotion, and professional development.]

- The agency has begun working to further its relationships with universal accessibility groups which focus on diverse populations interested in records management as well as widening our hiring pool to more diverse applicant groups.
- Participation by the EEO Director's attendance at job fairs throughout the five boroughs.
- Recruitment through NYC Jobs, the DORIS LinkedIn site and posting open positions in minority-based publications and with organizations focusing on library science.
- The agency hired a full-time EEO Officer who successfully deployed equity-related training including Everybody Matters and Sexual Harassment Prevention while helping employees with their questions and guiding them through the training process, ensuring full staff completion.
- The agency hired a Diversity, Equity, and Inclusion AmeriCorps Member who met regularly with agency leaders to develop standards for reparative description and improve accessibility to the archive and library collections.

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

[Describe how your agency will address underutilization in FY 2025. 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.]

[Also describe special initiatives to enhance equity, inclusion, and race relations in your agency programs and activities. Pay attention to age inclusivity, non-traditional minorities inclusion initiatives, engagement of traditional and older employees in inclusion efforts and discussion forums.]

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

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

The agency will continue to seek out and share with agency staff relevant workshops and training opportunities offered by other agencies, including the Department of Citywide Administrative Services, Workwell, and the Commission on Human Rights, among others.

The Municipal Archives and Library will be working with partners from marginalized communities to improve access to\_its\_collections and identify BIPOC voices and stories in its holdings. The agency will also continue to develop exhibits, public programs, and social media using the collections of the Municipal Archives and Library that offer new perspectives on the history of New York City.

#### **B. WORKPLACE**

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

[Workplace goals have to do with inclusion, workplace culture, and employee activities.]

- The agency will continue its strategy to enhance DEI and EEO awareness in the organization by working with the Quality-of-Life Committee (QWL). In the past year, the Committee has held an employee longevity event which celebrated diverse members of our staff who have worked for the City of New York from 10 to 45 years. In attendance were all staff members and multiple union heads as well as a representative from the Office of the Mayor. The QWL Committee participated in the Workwell JulyDration event and the annual step-contest.
- The QWL Committee will also be hosting an "international food" luncheon this fall with food provided by staff members who would like to celebrate and educate their co-workers about their culture's rich food heritage.
- DORIS hosted its annual holiday door decorating contest which proved to be hugely popular with staff.

- DORIS will search out and launch agency-wide diversity training as found in the DCAS catalog.
- DORIS will work to garner more diverse interest in the records management field through community outreach programs and facilitative partnerships.

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

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

- Attendance at diversity and inclusion workshops dealing with the lack of diversity in the library field so that we may encourage talent of different races, capabilities and backgrounds.
- The agency will continue to work with DCAS on diversity training courses.
- DORIS will be working with organizations such as TRIE, the Taskforce on Racial Inclusion
   Equity representing marginalized communities to promote equity and inclusion within our collections.

<ul> <li>□ Promote employee involvement by supporting Employee Resource Groups (ERGs) List below the names of existing ERGs:</li> <li>□ Agency does not presently have any ERGs.</li> <li>□ Agency will create a Diversity Council to leverage equity and inclusion programs</li> <li>□ Agency Diversity Council is in existence and active</li> <li>□ Agency will sponsor focus groups, Town Halls and learning events on race, equity, and inclusion</li> <li>☑ Agency will inform employees of their rights and protections under the New York City EEO Policy</li> </ul>	[Please select below the options that apply to your agency.]
<ul> <li>□ Agency will create a Diversity Council to leverage equity and inclusion programs</li> <li>□ Agency Diversity Council is in existence and active</li> <li>□ Agency will sponsor focus groups, Town Halls and learning events on race, equity, and inclusion</li> <li>☑ Agency will inform employees of their rights and protections under the New York City</li> </ul>	
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inclusion  Agency will inform employees of their rights and protections under the New York City	☐ Agency Diversity Council is in existence and active

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

#### C. COMMUNITY and EQUITY, INCLUSION and RACE RELATIONS

## State your Agency's general goals and strategies to enhance DEI and EEO in areas of Community and Race Relations.

[Community goals should be directed at the external environment of your agency, that is the public, communities, organizations, and other entities served by your agency.]

- Work to enhance the awareness of DORIS and its collection of records throughout diverse communities.
- Build closer relationships with minority interest groups in the records, library and archives fields.
- Use our outreach programs to increase the use of our collections and facilities by more diverse audiences.
- o Identify primary communities for outreach using data and collaborate with civic partners within target communities to tailor communication and programs.
- Develop a calendar of events that highlight the history and contributions of diverse communities
- Evaluate impact of programming through feedback from community stakeholders to ensure continued relevance and inclusivity.

## Planned Programs, Initiatives, Actions aimed at Community, Equity and Race Relations:

[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.]

[Also describe special initiatives to enhance equity, inclusion, and race relations in your agency programs and activities. Pay attention to age inclusivity, non-traditional minorities inclusion initiatives, engagement of traditional and older employees in inclusion efforts and discussion forums.]

- As we did last year, the agency will continue working with diverse partners from marginalized communities to improve the collections descriptions through the efforts of our newly-appointed DEI AmeriCorps Member.
- Use of our Neighborhood Stories oral history project which includes interviewing New Yorkers across the city to learn their untold stories.

- Completed the WomensActivism.NYC program which collects stories of women leaders from all over the world in a digital archive. The goal was to reach 10,000 women, which was achieved in December of FY25.
- Throughout the year, DORIS will host its virtual Lunch & Learn Series where the public can experience an intimate conversation with agency staff and special guests focusing on the collections of the Municipal Archives and Library and the history of New York City.
- We will continue with our Street Renaming Project. Our new map connects the public to the nearly 2,500 streets, intersections and other locations that have been conamed after notable people.

#### [Please select below the options that apply to your agency.]

In FY 2025, 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)

#### 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, and review of current policies procedures and practices related to recruitment and training hiring managers and recruiters on DEI courses.

NOTE: This section must be prepared jointly by Agency DEI-EEO and HR.

- ODRIS will work to garner more diverse interest in the records management field through community outreach programs and facilitative partnerships. One of these partnerships is through an internship program with CUNY Cultural Corps where the agency will introduce students to the library science, record and archives fields with a goal of developing the next generation in these fields.
- The agency will work with younger people of color in the college-to-work pipeline to enhance the interest in library science through internship and work programs.

- The agency uses a structured interviewing process, which includes EEO involvement at each stage of the hiring process and includes the following: all hiring managers must be trained in structured interviewing and unconscious bias; interview questions are reviewed by both the Agency Personnel Officer and EEO Officer and all hiring panels include an assigned EEO observer. The Administration Unit and the EEO Officer work together to ensure all postings particularly those in underutilized job categories are broadly distributed.
- The EEO Officer circulates workforce statistics to the agency head, agency attorney, and HR administrator for review on a quarterly basis. The EEO Officer also meets weekly with the agency head. The agency head, Agency Personnel Officer, and EEO Officer develop strategies to address underutilization collaboratively at the regular meetings.

#### B. Recruitment for Civil Service Exams

[Summary of recruitment efforts that will be undertaken in FY 2025 to promote open competitive and promotion civil service exams.]

List any planned recruitment events for FY 2025 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>	Event Name	Borough
	N/A	

List planned expenditures for FY 2025 related to recruiting candidates for open-competitive and promotion civil service exams.

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

Other	
(include	
online)	

#### 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. The agency provides all job postings for broader distribution to the Mayor's Office for People with Disabilities, as part of its 55A outreach efforts.
- 2. The agency provides all job postings in the Management Specialist titles to the Society of American Archives Archives and Archivists of Color as part of an effort to address underutilization based on race.
- 3. The agency provides all job postings in the Management Specialist titles to the Society of American Archives Latin American and Caribbean Cultural Heritage Archives (LACCHA) as part of an effort to address underutilization based on race.
- 4. The agency provides all job postings in the Management Specialist titles to the Society of American Archives Native American Archives Roundtable as part of an effort to address underutilization based on race.
- 5. The agency distributes postings to online listings and list services targeting various communities, including ARMA International website, Simmons College, Long Island University, CUNY placement offices, all archival and library programs nationally, and historically black colleges and universities. This is part of the agency's efforts to address race and gender underutilization in the management specialists and clerical job titles.

## 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 2024 and their demographic profiles, based on self-ID data. Indicate your plans to provide internship/fellowship opportunities in FY 2025. 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 2024:

Type of Internship\Fellowship	Total	Race/Ethnicity  *[#s]  * Use self-ID  data	Gender * [#s] * Use self-ID data
1. Urban Fellows	0		M _ F Non-Binary Other Unknown
2. Public Service Corps	1	Black/Hispanic	M _1_ F Non-Binary Other Unknown
Summer College     Interns	22	1 Black 4 Hispanic 13 Asian/Pacific Islander 4 White 1 Two or More Races	M _13_ F_8_ Non-Binary _1_ Other Unknown
Summer Graduate     Interns	0		M F Non-Binary Other Unknown
5. Civil Service Pathways Fellows	0		M F Non-Binary Other Unknown
6. 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 employs0_ [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 of0_ [number] new applications for the program were
	received and _0 participants left the program due to [state reasons]

[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.]

The 55A Coordinator is the Agency Personnel Officer who coordinates all aspects of the agency's recruitment process. The agency will continue to assess potential recruitment opportunities for 55A with future job vacancies and staff promotions. The agency currently has no employees participating in the 55A program. The agency will disseminate 55A information to all agency staff via email. The EEO Officer has also added information about 55A to the agency's intranet, including the FAQs document provided by DCAS. In addition, all job postings are shared with the Mayor's Office for People with Disabilities and Access VR for broader distribution.

$\hfill \square$ Agency uses mostly non-competitive titles which are not eli	igible for the 55-a Program.
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☐ Agency does not use the 55-a Program and has no participating employees.

## VI. Selection (Hiring and Promotion)

NOTE: This section must be prepared jointly by Agency HR and DEI-EEO. HR must describe the activities and plans of Agency Career Counselors in A) below. EEO must respond to questions in C) below.

#### 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.]

The agency's Career Counselor promotes awareness of opportunities for promotion and transfer within the agency through regular emails of vacancy announcements, upcoming DCAS exam schedule, professional development training opportunities, upcoming DCAS civil service training dates, etc. The Career Counselor also offers weekly office hours and by-appointment meetings, where staff can get guidance on HR matters.

#### **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.]

The EEO Officer works closely with the Agency Personnel Officer to ensure that staff involved on hiring panels have received required training in Equal Employment Opportunity practices, structured interviewing and unconscious bias. The EEO Officer or one of the agency's EEO counselors serve as an observer on all agency hiring panels, including mid- and high-level discretionary positions. Additionally, all interview questions are reviewed and approved by both the Agency Personnel Officer and the EEO Officer. The agency works to ensure that hiring panels are composed of staff from diverse backgrounds. The agency will train hiring managers in the use of the NYCAPS Applicant Interview Log reports; the Agency Personnel Officer and EEO Officer will use the reports to track applicant sources and identify the best sources of applicants.

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

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

The agency uses a structured interviewing process, which includes EEO involvement at each stage of the hiring process and includes the following: all hiring managers must be trained in structured interviewing and unconscious bias; interview questions are reviewed by both the Agency Personnel Officer and EEO Officer; all hiring panels include an assigned EEO observer; the Administration Unit and the EEO Officer work together to ensure all postings – particularly those in underutilized job categories – are broadly distributed. In FY 2025, the agency EEO Officer will do the following:

$\boxtimes$	Ensure that all vacancy announcements include the revised NYC EEO 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).
$\boxtimes$	Actively monitor agency job postings and ensure recruitment strategy aligns with the diversity goals of the agency.
$\boxtimes$	Provide consultation regarding creation/review of objective criteria for evaluating candidates for hire or promotion and applying those criteria consistently to all candidates.
$\boxtimes$	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.
$\boxtimes$	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:

#### 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 2025.
- ☑ 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 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
Everybody Matters: EEO and Diversity & Inclusion	All employees – Biennially (Cycle 2 must be	73	

	Training for NYC Employees (e-learning)	completed by March 31, 2025.)		
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.)	0	
3.	Sexual Harassment Prevention (e-learning)	All employees – Annually (Cycle 7 runs between September 1, 2024 – August 31, 2025)	73	8/31/25
4.	Sexual Harassment Prevention (classroom/live webinar)	All employees – Annually (Cycle 7 runs between September 1, 2024 – August 31, 2025)	0	
5.	IgbTq – Power of Inclusion (e-learning)	Managers, Supervisors, and Front-line employees (must be completed by March 31, 2026) All other employees	73	12/31/24
6.	lgbTq – Power of Inclusion (classroom/live webinar)	Managers, Supervisors, and Front-line employees (must be completed by March 31, 2026) All other employees	0	
7.	Disability Awareness and Etiquette	All Employees	73	06/30/25
8.	Structured Interviewing and Unconscious Bias (classroom/live webinar)	Managers Supervisors, and Front-line employees	25	6/30/25
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.]

- 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 implemented the modifications of Reasonable Accommodation Procedure announced in May 2024.
- ☐ The agency initiates the cooperative dialogue within 10 days from the request for Reasonable Accommodation.
- □ The agency grants or denies request within 15 days after from the conclusion of cooperative dialogue.
- ☑ When necessary, in certain time-sensitive circumstances the agency conducts and expedited review and grants or denies request in less than 15 days.
- ☑ 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.

<sup>&</sup>lt;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 Local Laws and Mayoral Executive Orders

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

- ☑ The agency plans to train <u>all</u> new employees on Sexual Harassment Prevention within 30 days of start date.
- □ The agency will train <u>all</u> current employees on Sexual Harassment Prevention (Cycle 7 September 1, 2024 August 31, 2025) 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 <u>all</u> new employees on Everybody Matters: EEO and Diversity & Inclusion Training for NYC Employees within 30 days of start date.
- ☑ The agency will train <u>all</u> 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

[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 2024.

<ul> <li>□ Reassignment</li> <li>☑ Modification of Work Schedule</li> <li>□ Flexible leave</li> <li>☑ Modification or Purchase of Furniture and Equipment</li> <li>□ Modification of Workplace Practice, Policy and/or Procedure</li> <li>□ Grooming/Attire</li> </ul>
E. Local Law 27 (2023): Diversity and Inclusion Training for FY 2025
□ List of diversity and inclusion training for FY 2025 is included in section VII of this annual plan.
F. Local Law 27 (2023): Workforce Information Report for FY 2024
☑ 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, 2024.
G. Local Law 28 of (2023): Diverse Recruitment and Retention in City Government
Under LL 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.
□Yes-The box won't click-The agency submitted all information required by LL 28 for FY 2024 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 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].

$\boxtimes$	The agency is $\underline{NOT}$ 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.]

Pauline Ann Toole
Print Name of Agency Head

Pauline Ann Toole Signature of Agency Head

June 4, 2025

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

#### **Agency EEO Office mailing address:**

[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 and HR 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. **NOTE:** Include staff performing any of EEO or HR-related roles in this listing even if they work in another part of the agency and not in the Office of DEI-EEO.

\*To prevent potential conflicts, the Career Counselor should not be within the EEO Office]

	Title/Function	Name	Email	Telephone
1.	Agency EEO Officer [indicate if 'Acting' or 'Interim']	Johnnie Davis	Jodavis1@records.nyc.gov	212-341-6036
2.	Agency Deputy EEO Officer [if appointed]	N/A		
3.	Agency (Chief) Diversity & Inclusion Officer [if appointed]	Johnnie Davis	Jodavis1@records.nyc.gov	212-341-6036
4.	Chief Diversity Officer/Chief MWBE Officer per E.O. 59	Johnnie Davis	Jodavis 1@records.nyc.gov	212-341-6036
5.	ADA Coordinator	Naomi Pacheco	napacheco@records.nyc.gov	212-788-8622
6.	Disability Rights Coordinator	Naomi Pacheco	napacheco@records.nyc.gov	212-788-8622
7.	Disability Services Facilitator	Gerald Rosero	grosero@records.nyc.gov	212-788-8610
8.	55-a Coordinator	Naomi Pacheco	napacheco@records.nyc.gov	212-788-8622
9.	EEO Investigator(s)	N/A		
10.	EEO Counselor(s)	Michael Lorenzini Urmi Udeshi Ridhdhi Patel	mlorenzini@records.nyc.gov uudeshi@records.nyc.gov Rpatel@records.nyc.gov	212.788.8576 212.788.8634 212-788-8599

		Gerald Rosero Julie Chau	grosero@records.nyc.gov Wchau@records.nyc.gov	212-788-8610
11.	EEO Training Liaison(s)	N/A		
12.	Career Counselor(s)	Naomi Pacheco	napacheco@records.nyc.gov	212-788-8622
13.	Other (specify)			