

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

Fiscal Year 2024

Office of the New York City Comptroller



OFFICE OF THE NEW YORK CITY
COMPTROLLER

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I. Commitment and Accountability Statement by the Agency Head

[This statement provides the Agency Head with an opportunity to articulate, in their own language, the agency's commitment to the values of diversity, equity, and inclusion (DEI), and equal employment opportunity (EEO). It should proclaim the assurance of a discrimination-free workplace, integration of this plan into the agency's strategic mission, and a declaration that all senior executives, managers, supervisors, and employees are accountable for upholding these values and are charged, within their scope of responsibility, to effectively implement the agency's DEI-EEO Plan. It must include the name and contact information of agency EEO Officer.]

[This statement will be issued by the Agency Head to all staff, via email, in January 2024:](#)

The Office of the New York City Comptroller is committed to fostering a diverse, equitable, inclusive, and respectful work environment that provides equal opportunities for all and is free of discrimination, harassment, and retaliation. Our office recognizes that having diversity across each of our teams benefits our employees, improves retention, and boosts morale. Additionally, we believe that having a culturally responsive team that reflects the diverse city we live in strengthens our ability to better serve New Yorkers.

The Comptroller's Office is an equal opportunity employer that will not tolerate discrimination or harassment of any kind against employees and/or applicants for employment on the basis of actual or perceived age, race, color, national origin or ethnicity, immigration or citizenship status, religion or creed, gender/sex (including pregnancy, childbirth, or related medical conditions, sexual harassment, gender identity or expression), disability, status as a current or former military service member, arrest or conviction record, marital or partnership status, caregiver status, genetic information or predisposing genetic characteristics, height, weight, sexual orientation, unemployment status, consumer credit history, familial status, salary history, sexual and reproductive health decisions, cannabis use, pre-employment marijuana testing, status as a victim/survivor of domestic violence, sex offenses, or stalking, or other non-merit based factors (collectively "protected status"). The Equal Employment Opportunity ("EEO") Policy of the Comptroller's Office is intended to implement this commitment.

It is also the Comptroller's Office policy that none of its employees or job applicants will suffer retaliation or harassment for raising good faith complaints of discrimination; opposing discrimination; participating (in any way) in an employment discrimination investigation or lawsuit; or engaging in any other protected activity.

Consistent with local, state, and federal laws governing reasonable accommodations, the Comptroller's Office will endeavor to accommodate specific needs to allow employees and applicants to apply for a job, perform the duties of a job, or enjoy equal benefits and privileges of employment that are enjoyed by similarly situated employees. It is a privilege to welcome employees from across demographic and lived experiences onto our team.

Any employee or applicant who believes they have been subject to discrimination, retaliation, or harassment should contact the EEO Officer or the General Counsel's Office.

EEO Officer

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EEO Counselor

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General Counsel Division
Generalcounsel@comptroller.nyc.gov

The Comptroller's Office will provide a prompt, thorough, and impartial investigation into any report of an alleged violation of the EEO Policy. Immediate and proportionate corrective action will be taken if it is determined that discrimination has occurred. The full EEO Policy is available on the agency intranet site: http://svweb01-wp/wp-content/uploads/2022/03/Equal-Employment-Opportunity-Anti-Discrimination-and-Anti-Harassment-Policy_Revised-March-2022.pdf

Thank you all for your dedicated service to the City of New York.

- This statement is the same as last year.
- This statement will be disseminated to all employees in the agency.

II. Recognition and Accomplishments

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

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

- **The Agency Head notified all employees of the Agency's strategic objective to make New York City more equitable and inclusive.**
- **The Agency Head notified all employees of the Agency's values: • *Principled*: We live up to high ethical standards. • *Collaborative*: We work together, internally and with external partners, to achieve our goals, and we treat everyone with respect. • *Communicative*: We share information so we can work together transparently. • *Equitable*: We aim to break down systems of racism, sexism, and inequality, to provide genuinely fair opportunities for all. • *Transformative*: We believe that change is possible and work hard to make it happen. • *Innovative*: We are open to new tools and practices.**
- **In the Agency's Strategic Plan, the Agency Head shared that racial equity and expanded civic participation emerged consistently in how bureaus were thinking about their priorities for 2023. Key internal priorities for the Comptroller's Office for 2023 included: • Improving hiring, retention, supervision, and teamwork, in order to establish a positive workforce culture that promotes the Office of the Comptroller's values. • Paying strong attention to equity internally, through our Equity Council, EEO work, M/WBE procurement, workforce & other efforts.**
- **Notifications recognizing historical, cultural, and diversity & inclusion milestones and commemorations went out to the agency throughout the year, including emails about National Disability Independence Day, Black History Month Historian Snapshots, Pride Month, AAPI Heritage Month, Transgender Day of Visibility, etc. In addition, employees were notified throughout the year of participatory community events, including**

parades and festivals like the Hong Kong Dragon Boat Festival, the West Indian Day Parade, the Rise UP NYC concerts, etc.

- **The Equity Council**, consisting of employees representing each bureau, convened monthly, working to ensure that there is alignment, inclusivity, and sustainability in the Comptroller’s vision for Equity.
- The Agency implemented a **new training program**, issuing a schedule of mandatory courses, professional development, and DEI training for all employees. In FY 24, elective options through Linked-In Learning will be available for all employees. As of this report, in FY 23, 454 employees were trained in Disability Awareness and Etiquette, 771 in Sexual Harassment Prevention, 669 in EEO and Diversity & Inclusion, 396 in LGBTQ: The Power of Inclusion, 176 in Structured Interviewing & Unconscious Bias, 182 in Performance Evaluation.
- **Brown-Bag Lunches** took place throughout the year, covering topics steeped in diversity, equity and inclusion themes, including political, cultural, historical, and economic overviews of the city's past, present and future.
- When there is work that should be recognized, employees can commend each other on **KUDOS**, the Agency’s employee recognition message board.
- The Bureau of Asset Management **Equity and Culture Committee** was established in December 2022. Its mission: To hire thoughtfully and build a diverse pipeline of employee talent, and to create an inclusive culture and retain diverse talent. Its Equity Sub-committee and Culture Subcommittee meet bi-weekly. The Committee has 18 volunteer members with diverse backgrounds which adds to the rich discussion. To date they have developed an employee survey that will be distributed before the end of 2023 and used to create the BAM Teambuilding & Events calendar. They are also developing a workplan for employee education and a list of suggestions for improving the diversity of our interns and workforce overall.
- Notifications went out from the Agency Head recognizing **external events**, including the “Ethnic & Community Media Roundtable,” with reporters & editors from more than two dozen community & ethnic newspapers from communities across the city, who asked questions and learned about the work of our office. Through the Public Affairs bureau, the Agency participated in 20 diverse and inclusive events, including cultural parades and community festivals, economic and housing panels and conferences.
- The Agency contracted with **MWBEs** – including The Nourish Spot, a smoothie drink company that served our Wellness activity participants a delicious product and a truly inspiring success story.

III. Workforce Review and Analysis

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

Total Headcount: 703

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

[Pursuant to Local Law 27 (2023), provide an analysis of your agency’s compensation data and measures to address pay disparity and occupational segregation in FY 2023. The term “occupational segregation” means a group’s under-representation or over-representation in certain jobs or fields of work, when such group is protected by the employment related provisions of the city’s human rights law and such group does not benefit from greater pay, responsibility, flexibility, stability, prestige, or other indicators of job desirability. To do this analysis, look at titles where pay disparity exists and salaries vary within the same title when compared by years of service. Also conduct a comparison of women and racial or ethnic minority group members.]

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

The Agency is in the process of conducting a compensation study that will allow us to rationalize the organizational structure and benchmark salaries as a tool for equitable hiring. We are developing an annual bureau-specific hiring plan which will utilize demographic data to help inform our recruitment strategies.

- This agency conducts reviews of pay structures to confirm that employees are being paid in accordance with their collective bargaining agreements as part of our regular payroll and timekeeping processes – we have specifically conducted a review most recently for over 50% of our active staff members in preparation for the execution of their new collective bargaining agreements. We identified 15 issues and have already corrected the issues.
- The Agency has undertaken a review of the underutilization identified in the quarterly workforce reports. In Q2 our single area of underutilization was -13 in Black / Job Group Clerical. In Q3 and Q4, our single area of underutilization was -12 in Black / Job Group Clerical. We will continue to review the ethnicities of the employees in that Job Group, remaining mindful of the suggested need to increase that category by 12. *FY24 Success Metrics:* Comparison of each quarter’s underutilization numbers should result in a decline in underutilization.
- We are concluding an agency-wide benchmarking analysis that includes both a compensation and organizational structure component. The analysis includes comparisons across parameters such as civil service title, collective bargaining unit, scope of responsibility in the organization, standard job titles, years of service, demographic information (race and gender) and other available data points in CHRMS/NYCAPS.

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

- **The EEO Officer sends an email to the Agency every March encouraging all employees to update self-ID info. In addition, we encourage self-ID updates at onboarding.**

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

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

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

- **The EEO Officer receives a quarterly workforce report provided by the director of Workforce Data Analytics in NYC DCAS Human Capital. The Comptroller's Office (EEO, Human Resources and Administration) uses this report, along with the quarterly CEEDS workforce composition summary and the Agency's bureau organizational charts, to create gender and ethnicity breakdown charts that allow us to assess the demographic balance of each bureau in order to review data and explore the need for other recruitment outreach or retention efforts. These bar and pie charts are shared with the agency head and made available to senior leadership so that they may consider the data when formulating bureau diversity and inclusion goals.**
- **In FY 2024, the EEO Officer will continue to provide bureau demographics to the Agency Head and Bureau Leads on a quarterly basis.**
- **The EEO Officer will present the workforce dashboard to the Dep. Comptroller & Asst. Comptroller for HR quarterly.**
- **The review and analysis of workforce data with the Agency Head will take place annually in December.**

[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 [as necessary](#)

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 2024

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

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

❖ **Workforce:**

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

➤ **[Learning & Development Goals](#)**

Career Counseling · Ensure that Comptroller's Office Employees can identify the Agency's Career Counselor
· Ensure that Comptroller's Office employee are aware that the Career Counselor role is to provide guidance and counseling tailored to the individual employee's career path within the Agency/City government.

SWAP Program · Develop and Implement and employe job swapping program

Skills Training · Ensure that Comptroller's Office employees leverage the LinkedIn platform

Performance Evaluations · Ensure that Comptroller's Office supervisors receive training in conducting performance evaluations and tasks & standards · Ensure that all Comptroller's Office employees have current Tasks & Standards and receive performance feedback

➤ **Mentoring & Coaching Goals**

Leadership Training · Update Mandatory Curriculum for Managers & Supervisors

Mentoring Program · Develop Agency Mentoring Program

❖ **Workplace:**

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

➤ **Recognition / Value**

Comptroller's Office Recognition Program · Standardize recognition efforts throughout the agency · Ensure that Comptroller's Office the bureaus and managers prioritize employee recognition

➤ **Contribution to Mission & Team**

Multi-Bureau Collaborations · Leverage cross-bureau teams for projects

Team Building Activities · Create opportunities for employees to collaborate and have fun

❖ **Community:**

- [Community goals should be directed at the external environment of your agency: the public and entities served by the agency.]

➤ **Volunteer Opportunities** -- Create volunteer opportunities for Comptroller's Office Staff

➤ **Increase Transparency and Advocate for Ways to Increase M/WBE Contracting**

➤ **Streamline Procurement Processes to Direct Higher Value Contracts to M/WBEs**

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

- [Describe special initiatives to enhance equity, inclusion, and race relations in your agency programs and activities. (Age inclusivity, non-traditional minorities inclusion initiatives, engagement of traditional and older employees in inclusion efforts and discussion forums)]

➤ **The Equity Council:** Created in Q4 of FY2022, and coordinated and co-facilitated by the Chief Equity Officer, this agency-wide working group will meet monthly and anchor the Office's Equity work. Under the leadership of the Chief Equity Officer, working group members will ensure that there is alignment, inclusivity, and sustainability in the Comptroller's vision for Equity. Members are tasked with: Bringing their lived and professional experiences in public policy and government to create a more just and equitable City through collective inquiry, organizing and research; Attending monthly 90-minute meetings with the Chief Equity Officer; Anchoring the work of the Comptroller's Office and the Chief Equity Office(r) with thought-partnership, policy solutions, expertise; Creating

a process of developing the Comptroller’s Equity work that is inclusive, accessible, and accountable to all bureaus and staff; Supporting the development of bureau and agency-wide gender and racial equity goals; Generating interest and enthusiasm in Equity work through engagement opportunities (workshops, brown bag lunches, roundtables, convenings, affinity spaces); Reviewing and providing feedback on bureau and community/practitioner-based findings, and using these findings to shape the Comptroller’s Chief Equity Officer’s framework and recommendations.

2. Planned Programs, Initiatives, Actions

[Describe the ongoing and new programs, actions, and initiatives planned for FY 2024, which are aimed toward enhancement and expansion of the three foundations of Diversity and EEO strategy: Workforce, Workplace, and Community.]

A. Workforce

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

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

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

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

➤ Learning & Development Actions/Initiatives

Career Counseling ·Quarterly Announcements are sent indicating the name and contact information for the individual who has been designated to serve in the Career Counselor role and the services provided by the Career Counselor. ·Mid-Year Teams Informational Session About Career Counseling ·Monthly Distribution of Civil Service Exam filing Schedule

SWAP Program ·Develop Program parameters, duration, and eligibility ·Partner with Bureaus in development of program to ensure continuity of operations ·Announce program ·Select participants

Skills Training ·After initial announcement, reminders are sent to employees on a bi-monthly basis encouraging them to complete a LinkedIn Learning course

Performance Evaluations ·Identify staff with direct reports and schedule them to attend performance evaluation and Tasks & Standards training ·Share compliance reports with bureaus

➤ Mentoring & Coaching Actions & Initiatives

Leadership Training· Collaborate with DCAS to arrange for leadership training for managers and supervisors

Mentoring Program ·Develop program parameters, duration, eligibility ·Develop action plan for implementation

➤ Underutilization Actions & Initiatives

The Agency has undertaken a review of the underutilization identified in the quarterly workforce reports. In Q2 our single area of underutilization was -13 in Black / Job Group Clerical. In Q3 and Q4, our single area of underutilization was -12 in Black / Job Group Clerical. We will continue to review the ethnicities of the employees in that Job Group, remaining mindful of the suggested need to increase that category by 12. *FY24 Success Metrics:* Comparison of each quarter’s underutilization numbers should result in a decline in underutilization.

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.).]

➤ **Recognition / Value Actions & Initiatives**

Comptroller's Office Recognition Program · Develop & publish Recognition program that includes categories, criteria, selection and approval processes · Develop Dashboard for Employee recognition activities (KUDOS, Bureau sponsored activities, etc., # employees recognized/bureau)

➤ **Contribution to Mission & Team Actions & Initiatives**

Multi-Bureau Collaborations · Job Fair

Team Building Activities · Haunted Halls for Halloween · December Deck the Doors · Mocktail Meetup · Wellness Wednesdays

[Select the options that apply to your agency.]

- Promote employee involvement by supporting Employee Resource Groups (ERGs).
We are willing and eager to implement ERGs when our resources allow.

List below the names of existing ERGs:

- 1.
- 2.
- 3.
- 4.
- 5.

- Agency will create a Diversity Council to leverage equity and inclusion programs
- Agency Diversity Council is in existence and active

➤ **The Agency EQUITY Council is in existence and active.**

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

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

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

C. Community

[In addition to the strategic goals above, please describe in details specific initiatives, programs and policies planned with respect to your agency's services to the community. This should include initiatives to enhance equity, improve community relations and increase awareness about services offered by your agency.]

➤ **Volunteer Opportunities: · Making Strides Walk · Holiday Toy/Food Drive**

➤ **Increase Transparency and Advocate for Ways to Increase M/WBE Contracting**

- In Q3 of FY24 (~February 2024) BCA plans to release its Annual Report on M/WBE Procurement. This Report offers transparency into City contracting and analyzes contract registrations and spending with M/WBEs. This Report also offers recommendations for ways that the City can direct a higher share of contracts and contract value to M/WBEs.
- In collaboration with Public Affairs and the Chief Equity Officer, BCA will participate in and support Comptroller's Office M/WBE Borough Events. In partnership with several elected officials our Office will convene M/WBEs to create space to answer questions and discuss barriers and challenges to doing business with and in the City. Our Office is also planning to arrange a panel of M/WBEs at October's Hispanic Heritage Month event in Manhattan.

➤ **Streamline Procurement Processes to Direct Higher Value Contracts to M/WBEs**

- In FY24 BCA will collaborate with MOCS and City agencies to effectuate State legislation aimed at eliminating bureaucratic barriers for M/WBEs. BCA will work with the City to implement an increased threshold for the M/WBE Noncompetitive Small Purchase (NCSP) method. This method allows City agencies to make direct contract awards to M/WBEs with limited targeted competition. The method is one of the City's most effective tools in driving prime contract awards to M/WBEs.
- In Q1 of FY24 BIST will make data relevant to M/WBE procurement more accessible across City data tools. BIST will work with the NYC Department of Small Business Services (SBS) to enhance the Online Directory of Certified Vendors to include a link to Checkbook NYC to offer real-time registration and spend data. This up-to-date information will bolster the market research and vendor outreach required of agencies when targeting vendors when using discretionary award methods. It will also support agencies in establishing appropriate participation goals required of prime vendors.
- In FY24 BCA will monitor City progress towards effectuating additional State legislation aimed at eliminating bureaucratic barriers for M/WBEs.
 - The City will support an expansion of M/WBE mentorship programs across additional City agencies. BCA will monitor the progress towards establishing these programs and advocate for sufficient resources to support this initiative.
 - In FY24, the City and State will enter into an agreement for reciprocal acceptance of M/WBE certification across municipalities. This will streamline the duplicative requirements of M/WBEs

hoping to do business with both the City and State. Our Office celebrates this and will monitor its success and advocate for enhancements to City systems to ensure proper implementation.

In FY 2024, the agency will:

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

V. Recruitment

A. Recruitment Efforts

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

- **The NYC Comptroller’s Office posts all positions we are seeking to fill on both the Comptroller’s Office website as well as JOBS NYC, the official Career website of the City of New York. We also post positions through LinkedIn. In FY 2024 we are taking efforts to increase the diversity of our qualified candidate pools by partnering with Bureaus to identify additional sites for posting our positions, including organizations whose mission includes partnering to increase diversity in workplaces.**

B. Recruitment for Civil Service Exams

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

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

Event Date	Event Name	Borough
TBD	Our upcoming Career Day event will be an opportunity to talk about civil service.	TBD

List planned expenditures for FY 2024 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

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.]

- During the last fiscal year, we have not leveraged any of the sites listed below, but will for FY 2024 in an effort to increase the diversity of our workforce.
 - [NABA INC.](#)
 - [Career Opportunities - National Association of Securities Professionals \(NASP\) \(nasphq.org\)](#)
 - [ALPFA](#)
 - [NMBBAA – Empowering Visionaries](#)
 - [NSBE | Supporting Black Engineers and Scientists](#)
 - [The Robert Toigo Foundation Employers - The Robert Toigo Foundation](#)

D. Internships/Fellowships

[Indicate the type of internship/fellowship opportunities available at your agency. Please provide the number of student interns/fellows employed in FY 2023 and their demographic profiles, based

on self-ID data. Indicate your plans to provide internship/fellowship opportunities in FY 2024. What are the sources you plan to draw upon in recruiting and hiring interns? Are you providing opportunities for interns to advance to entry-level positions in your agency? Did the agency hire interns in the past? Explain the reason if your agency does not offer internship /fellowship opportunities.]

- In FY 2024, the Agency welcomes 14 Civil Service Pathways Fellowship (CSPF) fellows to the two-year program for City University of New York (CUNY) graduates designed to create a pipeline from college to a career in civil service.

The agency provided the following internship opportunities in FY 2023:

Type of Internship/Fellowship	Total	Race/Ethnicity *[#s] * Use self-ID data	Gender * [#s] * Use self-ID data
1. Urban Fellows	N/A	N/A	M _ F_ Non-Binary_ Other _ Unknown _
2. Public Service Corps	14	B: 4 W: 3 H: 2 A: 5 2 or more: 0 Native Hawaiian or other pacific Islander: 0 Amer. Indian: 0	M <u>7</u> F <u>7</u> Non-Binary _ Other _ Unknown _
3. Summer College Interns	30	B: 8 W: 8 H: 5 A: 7 2 or more: 1 Native Hawaiian or other pacific Islander: Amer. Indian: 1	M <u>14</u> F <u>10</u> Non-Binary <u>1</u> Other _ Unknown <u>5</u>
4. Summer Graduate Interns	8	B: 1 W: 4 H: 1 A: 1 2 or more: 1 Native Hawaiian or other pacific Islander: Amer. Indian:	M <u>2</u> F <u>5</u> Non-Binary _ Other __ Unknown <u>1</u>
5. Other (specify):			M __ F__ Non-Binary __ Other __ Unknown __

E. 55-a Program

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

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

[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 Agency's goals are to work with HR to assess the population of provisional employees, to recruit more 55-a employees, and to determine if there are employees we can transition into 55-a eligibility. Currently there are two 55-a participants.**
- **We will make further efforts to educate our full staff on the 55-a program. We have a 55-a presentation set for managers. We will incorporate promotion of 55-a and Civil Service in our upcoming career program.**

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

[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.]

- **Goals:**

- Ensure that Comptroller's Office Employees can identify the Agency's Career Counselor
- Ensure that Comptroller's Office employee are aware that the Career Counselor role is to provide guidance and counseling tailored to the individual employee's career path within the Agency/City government.

➤ Activities:

- Quarterly Announcements are sent indicating the name and contact information for the individual who has been designated to serve in the Career Counselor role and the services provided by the Career Counselor.
- Mid-Year Teams Informational Session About Career Counseling
- Monthly Distribution of Civil Service Exam filing Schedule

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.]

➤ New Hires and Promotions

All promotional opportunities are posted on the Agency's public internet job board. Internal candidates are encouraged to apply,

Please note: The Agency will engage in the practices listed above. However, as a non-Mayoral agency, the Comptroller's Office does not reach out to the Mayor's Office for recruitment assistance. We do review promotion data with the Executive Deputy Comptroller and the Deputy for Administration. The Agency does actively partner with the Office of Citywide Recruitment -- and will continue to do so in the future.

The Agency is a part of eHire in NYCAPS, and we actively use it as a recruitment tool. The Agency can gather and develop hiring and promotion demographic data going forward.

C. EEO Role in Hiring and Selection Process

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

➤ EEO Role in Hiring and Selection Process

The Agency will: Ensure that hiring managers are trained in structured interviewing techniques to avoid unintentional biases in the hiring process; Assess the manner in which candidates are selected for employment, to determine whether there is any adverse impact upon any particular racial, ethnic, disability, or gender group; If adverse impact is discovered, determine whether the criteria being utilized are job-related.

If the criteria are not job-related, the agency will discontinue using that method; Engage in a collaborative effort between EEO, HR and managers where necessary, develop action plans to eliminate identified

barriers; In conducting job interviews, ensure nondiscriminatory treatment by conducting a structured interview, where the same questions are asked of all applicants for a particular job or category of job and inquiring about matters directly related to the position in question; Use a diverse panel of interviewers to conduct the interview.

The Agency expects to engage in the practices listed above, and we're working to enhance our selection process through management structured interview training, increased EEO involvement in the process, and the development of an updated HR Candidate Management application.

In FY 2024, the agency EEO Officer will do the following:

- Ensure that all vacancy announcements include the revised NYC EEO I Anti-Discrimination Statement.
 - Review vacancy postings to ensure elimination of language that has the potential for gender and age stereotyping and other unlawful discrimination. (It is recommended to use gender-neutral terms and pronouns and language that is age-inclusive).
 - Actively monitor agency job postings and ensure recruitment strategy aligns with the diversity goals of the agency.
 - Provide consultation regarding creation/review of objective criteria for evaluating candidates for hire or promotion and applying those criteria consistently to all candidates.
 - In collaboration with the Director of Human Resources, review interview questions to ensure that they are EEO-compliant, job-related, and required by business necessity.
 - Assist the hiring manager if a reasonable accommodation is requested during the interview.
 - Observe interviews, when necessary, especially for underutilized job titles and/or mid- and high-level discretionary positions.
 - Advise Human Resources to use candidate evaluation form for uniform assessment and equity.
 - Periodically review candidate evaluation forms and conduct a job applicant analysis via the NYCAPS eHire Applicant Interview Log reports to advise Human Resources of any demographic trends and/or EEO concerns based on available self-ID data.
 - Review hiring package to evaluate that the selection process was conducted in accordance with EEO best practices.
 - Other: _____
- **Please note: The EEO Officer would review a hiring package ONLY if something about it raises a flag (for example, if there's an issue with demographics, an obvious bias regarding the choice, or something similar).**

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

VII. Training

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

Training Topic	Type of Audience (e.g., All Staff, Front-line Employees, Managers, Supervisors, etc.)	Goal Number of Participants	Projected Dates
1. Everybody Matters: EEO and Diversity & Inclusion Training for NYC Employees (e-learning)	All employees – Biennially (Cycle 2 must be completed by March 31, 2025.)	All Agency (700+)	Oct 20, 2024
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.)	n/a	n/a
3. Sexual Harassment Prevention (e-learning)	All employees – Annually (Cycle 6 runs between September 1, 2023 – August 31, 2024)	All Agency (700+)	Aug 18, 2024
4. Sexual Harassment Prevention (classroom/live webinar)	All employees – Annually (Cycle 6 runs between September 1, 2023 – August 31, 2024)	n/a	n/a
5. IgbTq – Power of Inclusion (e-learning)	Managers, Supervisors, and Front-line employees (must be completed by March 31, 2024) All other employees	All Agency (700+)	March 29, 2024
6. IgbTq – Power of Inclusion (classroom/live webinar)	Managers, Supervisors, and Front-line employees (must be completed by March 31, 2024) All other employees	n/a	n/a
7. Disability Awareness and Etiquette		All Agency (700+)	March 24, 2024
8. Structured Interviewing and Unconscious Bias (classroom/live webinar)		Managers, Supervisors (approx. 170)	April 27, 2024

9. Other (specify) Unconscious Bias	All employees	All Agency (700+)	Oct 2024
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:

➤ **Reasonable Accommodation Procedures:**

The Agency Employees have a right to request a workplace accommodation for a disability; pregnancy, childbirth, or a related medical condition; religion; or based on status as a victim/survivor of domestic violence, a sex offense or stalking.

Such requests may be made verbally or in writing. Requests for accommodation can be made to the EEO Officer, agency personnel supervising the application process, or the employee’s immediate manager and supervisor. All requests should be forwarded to the EEO Office. Employees may complete a Request for Reasonable Accommodation form, which is available on the Office intranet. Where the request is made orally, it shall be documented by the person who receives the request.

The EEO Officer will advise the requestor of the application procedures required for each request, and work with the employee’s manager or manager or supervisor to determine whether the requested accommodation is reasonable and can be granted, consistent with relevant law.

The EEO Officer, agency personnel supervising the application process, and managers and supervisors involved in the process shall provide reasonable assistance (such as help in completing forms) to an individual requesting an accommodation. Additionally, if a reasonable accommodation is requested to facilitate an individual’s ability to apply for employment, the agency staff supervising the application procedures may be required to assist the applicant in completing the application process.

Accommodations will be provided unless doing so would impose an “undue hardship” on the operations of the Comptroller’s Office. “Undue hardship” means an action requiring significant difficulty or expense when considered in light of numerous factors. These factors include the nature and cost of the accommodation in relation to the size, resources, nature, and structure of the employer’s operation.

Undue hardship is determined on a case-by-case basis. If a particular accommodation would be an undue hardship, the Comptroller’s Office will try to identify another accommodation that will not pose such a hardship to its operations.

Reasonable accommodation requests that have been approved are generally submitted within 24-48 hours of receipt.

If a request is denied, the requestor may appeal to the agency head or the agency head's designee within 30 days. If the decision on appeal is to grant a reasonable accommodation, the agency head/designee must direct the appropriate agency representative to implement the accommodation.

The Agency does analyze the types of requests, by volume and trend.

Reasonable Accommodation procedures are distributed to employees annually and are available at all times on the Agency's intranet site.

- 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 : [Sandra Abeles, Executive Deputy Comptroller](#)
- 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.

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.

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

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

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

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

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

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

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

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

- Employees have access to gender appropriate bathrooms and lactation rooms.
- Employees are provided with information on how to request workplace accommodations and has access to respective facilities, including access for individuals with disabilities.

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

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

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

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

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

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

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

X. Audits and Corrective Measures

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

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

The Audit Determination of Compliance was issued on 4/27/2023. A copy of the Certificate of Compliance is attached below.

This

Determination of Compliance

is hereby issued to

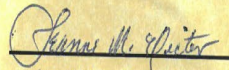
Office of the New York City Comptroller

for successful implementation of 13 of 13 required corrective action(s),
thereby achieving compliance with the Equal Employment Practices Commission's
Employment Practices Audit (Focus on Underutilization)
from July 1, 2019, to this date.

On this twenty-seventh day of April in the year 2023



Aldrin Rafael Bonilla, Chair/Commissioner



Jeanne M. Victor, Executive Director

In care of Brad Lander, Comptroller
and Diane Jones Randall, EEO Officer

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.]

Sandra Abeles on behalf of Comptroller Lander
Print Name of Agency Head


Signature of Agency Head

2-5-24
Date

Appendix A: Contact Information for Agency EEO Personnel

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 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']	Diane Jones Randall	drandal@comptroller.nyc.gov	212-669-3692
2.	Agency Deputy EEO Officer [if appointed]	n/a	n/a	n/a
3.	Agency (Chief) Equity Officer Diversity & Inclusion Officer [if appointed]	Sadye Campoamor	scampo@comptroller.nyc.gov	212-669-7746
4.	Chief Diversity Officer/Chief MWBE Officer per E.O. 59	John Katsorhis	jkatsor@comptroller.nyc.gov	212-669-1904
5.	ADA Coordinator	Diane Jones Randall	drandal@comptroller.nyc.gov	212-669-3692
6.	Disability Rights Coordinator	Diane Jones Randall	drandal@comptroller.nyc.gov	212-669-3692
7.	Disability Services Facilitator	Nick Astor	nastor@comptroller.nyc.gov	w: 929-496-1937 c: 917-972-7086
8.	55-a Coordinator	Briana Abraham	babraha@comptroller.nyc.gov	212-669-1986
9.	EEO Investigator(s)	n/a	n/a	n/a
10.	Career Counselor(s)	Amanpreet Singh	asingh@comptroller.nyc.gov	212-669-7579
11.	EEO Training Liaison(s)	Bonnie Duen	Bduen1@comptroller.nyc.gov	212-669-7840
12.	EEO Counselor(s)	Sherry Williams-Nisbett	swillia@comptroller.nyc.gov	212-669-7384

13.	Other (specify)			
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Appendix B: Local Law 28 (2023) – Diverse Recruitment and Retention

Agency Name: **Comptroller’s Office / N/A**

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

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

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

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

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

Borough	Approximate Dollar Amount Spent (\$)
Bronx	
Brooklyn	
Manhattan	N/A
Queens	
Staten Island	

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

Event Date	Event Name	Borough
	N/A	

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

N/A