

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

Fiscal Year 2025

**Office of Administrative Trials and Hearings
(OATH)**



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

Two cornerstones of OATH's work are fairness and respect. OATH's mission is to ensure that everyone – from the staff who work at OATH to the parties who bring cases to OATH for adjudication – is treated fairly and respectfully. As Commissioner and Chief Administrative Law Judge, I reaffirm OATH's strong commitment to having a culture that values diversity, equity, and inclusion, a workplace that is free from discrimination, and a workforce that adheres to the Citywide EEO policy. The implementation of the agency's EEO Policy is one of OATH's highest priorities and has my full support.

Recognizing that its workforce is OATH's greatest asset, OATH's leadership is committed to the recruitment, development, and retention of a diverse and inclusive workforce reflective of our City's population. When we appreciate our differences, we build stronger teams driving the best performance. Promoting these values and ensuring compliance with both the letter and spirit of the EEO policy is a team effort. OATH supervisors and managers have a duty to uphold the EEO policy and to implement the agency's EEO plan as it relates to their areas of responsibility. In addition, all employees have a role to play in creating a safe, equitable, and inclusive work environment that demonstrates dignity and respect for all employees.

Consistent with the City's EEO Policy, all employment decisions must be made on the basis of equal opportunity. Persons are not to be discriminated against based on their actual or perceived Race; Color; National Origin or Ethnicity; Immigration or Citizenship Status; Religion or Creed; Disability; Age; Status as a Veteran or Active-Duty Military Service Member; Arrest, Conviction, or Pending Case; Cannabis Use; Pre-employment Marijuana Testing; Marital or Partnership Status; Caregiver Status; Predisposing Genetic Characteristics; Sexual Orientation; Victims of Domestic Violence, Sex Offenses, and Stalking; Gender/Sex, (Including Pregnancy, Childbirth, or Related Medical Conditions), Gender Identity or Expression; Unemployment Status; Consumer Credit History; Familial Status; Salary or Pay History; Sexual and Reproductive Health Decisions; and Height or Weight.

Lastly, the agency will take all steps necessary to ensure that all employees are aware of their rights and obligations under the Citywide EEO Policy. I encourage all OATH employees to access the resources available within OATH and to address any concerns they may have by contacting Sharina DeRoberts, EEO Officer at 212-436-0524 or via email at SDeRoberts@oath.nyc.gov.

☒ This statement is the same as last year.

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

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

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 newly created Fun@Work Committee organized several events including Bring your Child to Work Day. The day consisted of volunteers throughout the Agency participating in Mock trials and educating children on how OATH adjudicates quality of life summonses issued by NYC Agencies. Children also learned about the different careers available within City government. Other events included, OATH 2024 Olympics Bingo, In-person and virtual mediation sessions, Viewing Solar Eclipse, Kid's Clothing and Toy Swap, and OATH's Men's and Women's March Madness office Pool.
2. The newly created Caregiver Committee held several lunchtime meetings where employees got the opportunity to get together and share stories of the joys and challenges of being a caregiver and maintaining a work life balance. The Committee is made up of 10 employees from across all Divisions. The Committee meets once a month and in FY 2024, organized a Kid's Clothing and Toy Swap. The event was well attended, and all leftover items were donated to Charity. In FY 2025, the Committee is working on organizing an event on Estate Planning and Elder Care. Additional events will be planned throughout the year.
3. With the Commissioner's guidance, the Special Events Committee established the 2024 OATH Staff Awards. The awards were established to recognize outstanding employees and teams that demonstrate their dedication and commitment to the agency and our work. Employees were encouraged to nominate their peers in 7 distinct award categories. OATH also requested peer nominations for the 2024 Annual Excellence in Customer Service Awards.
4. The Center for Creative Conflict Resolution (The Center) facilitated training workshop for Managers and Supervisors who were nominated by their Deputy Commissioners. The sessions were titled: The Loop of Understanding (Listening) & Communication, Using a Feedback Framework, Aligning Leadership with Values, and Leadership and Cultural Humility.
5. Created the "Meet your Colleagues" section in our employee Newsletter. Each month, a new Division is highlighted, and employees get a chance to learn what their colleagues' duties and responsibilities are, the challenges they face, and what motivates them.

6. Created "The Office"-a virtual tour of our different offices where employees can "meet" their co-workers and see where they work. Each month, the Commissioner visits a different OATH office and then disseminates a short video of his trip via an Agency Wide Bulletin.

III. Workforce Review and Analysis

Please provide the total agency headcount as of 6/30/2024

Total Headcount: 727

[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.

1. [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.]

OATH is committed to ensuring that employees are compensated appropriately pursuant to their collective bargaining agreements and Mayor's personnel Orders (MPO). In the event that there is a miscalculation of an employee's compensation, OATH will work expeditiously to ensure proper compensation.

Last year, OATH conducted a pay parity analysis by evaluating the compensation of (a) Deputy Commissioners and individuals serving in roles that are functionally equivalent to Deputy Commissioner and (b) Assistant Commissioners and individuals serving in roles that are functionally equivalent to Assistant Commissioner.

An analysis of salaries revealed no material pay disparities by gender or minority status. For Deputy Commissioners and related titles, the difference between the average male salary and the average female salary was less than 1%, and the difference between the average minority salary and the average white salary was less than 1%. For Assistant Commissioner and related

titles, the difference between the average male salary and the average female salary was less than 1%, and the difference between the average minority salary and the average white salary was only 6.6%. This year, the agency has been working to close this gap even further with managerial discretionary funds.

Our CEEDS reports are reviewed quarterly with a focus on over and underutilizations. These reports show no imbalance of certain ethnic or gender categories in major job groups.

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.]

In FY 2025, 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 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/Ethnicity ____33____ Unknown Gender ____2____ Unknown Both ____0____

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

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

[Select the options that apply to your agency.]

Agency Head

☒ Quarterly ☐ Semi-Annually ☐ Annually ☐ Other _____

Human Resources

☒ Quarterly ☐ Semi-Annually ☐ Annually ☐ Other _____

General Counsel

☒ Quarterly ☐ Semi-Annually ☐ Annually ☐ Other _____

Other (Deputy Commissioner for Administration)

☒ 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.]

Continue to recruit on forums that could attract applicants from various racial, religious, ethnic background.

Continue to promote existing staff into roles and titles that align with their skills and contributions, create new opportunities for individual development, and reduce attrition risks.

Encourage current staff to apply for leadership roles that become available.

Continue to encourage Managers and Supervisors to provide ongoing feedback to their employees prior to formal evaluations.

Promote our Judicial Hearing Officer (JHO) positions on various forums highlighting that there is no longer a residency requirement.

Use CEEDS reports and analysis to drive our recruitment strategies.

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

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.

In previous quarters, OATH has consistently reported no underutilization of women and minorities in our workforce. In FY 2025, if underutilization of women and minorities exists, the EEO Officer will identify these job groups and, together with the HR Team, work to increase targeted recruitment.

In FY 2025, OATH will continue its targeted recruitment for our Judicial Hearing Officer positions especially in light of the cannabis-related cases that are now being heard at OATH.

The Commissioner will continue to personally reach out to affinity groups and bar associations and promote our open vacancies.

In FY 2025, OATH will continue to participate and recruit for positions under the Silver Stars Program.

In FY 2025, the Career Counselor will disseminate information regarding upcoming civil service exams and encourage provisional employees to take exams to advance their careers.

In FY 2025, OATH will continue to work with MOPD to identify candidates for the 55-A program.

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

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.]

In FY 2025, the Fun@ Work Committee will continue to organize events and activities as way to promote an inclusive workplace culture and increase participation amongst staff.

In FY 2025, OATH will hold its First Annual Staff Awards where employees will get to nominate their peers in particular award categories.

In FY 2025, the agency will continue to honor heritage months by sending agency-wide newsletters which celebrate and acknowledge various ethnic and marginalized groups.

In FY 2025, the Caregiver Committee will continue to organize events and meetings throughout the year.

[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:

[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.).]

[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 outlined in our 5-Year Accessibility Plan, in FY 2025, OATH will deploy and encourage front line staff to take the Computer Based (CBT) Disability Etiquette training.

In FY 2024, OATH appointed a new Digital Inclusion Officer (DIO). In FY 2025, the DIO will continue to ensure accessibility of websites and other digital content made publicly available.

As mentioned above, in FY 2025 OATH will continue to celebrate heritage months and encourage employees to submit pictures or blurbs about their family traditions to be published in our Employee Newsletter.

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

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

1.

2.

3.

4.

5.

☒ Agency does not presently have any ERGs.

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

☐ Agency Diversity Council is in existence and active

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

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

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

C. COMMUNITY 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.]

In FY 2024, OATH participated in several Community Outreach events to increase its visibility in the community. In FY 2025, OATH will continue to meet with Council Members and the public to educate the communities we serve on how to respond to a summons. In FY 2024, the Commissioner presented OATH's Pro Bono Service Award to an NYU Law School Student. This was the first time OATH had a student-run pro bono provider where respondents can receive legal assistance. OATH hopes to continue this collaboration in FY 2025.

The Center for Creative Conflict Resolution (CCCR) will continue to be a resource to the community and other government agencies. In FY 2024, the Center provided mediations, conflict resolution trainings, restorative circles, coaching sessions, and consultations. This work will continue in FY 2025.

The CCCR also administers MEND NYC (Mediating Establishment and Neighborhood Disputes), which provides free mediation and conflict resolution services to address a number of neighborhood disputes that impact all New Yorkers. This work will continue in FY 2025.

OATH's Help Center is staffed by a diverse group of Procedural Justice Coordinators (PJC), who provide legal information and resources for Respondents who received a summons and do not have a lawyer, a paid professional, or a registered representative. The latest data for FY 2024 Quarter 4, showed that there were over 13,000 Respondents who had an active help session with a PJC. This volume is expected to increase in FY 2025.

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.]

In FY 2025, OATH will continue to be a visible presence in the community by partnering with community organizations, elected officials, and other leaders throughout the 5 boroughs to educate the public on how to respond to a summons.

[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)
 - ☒ 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, 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.

OATH has filled most of its vacancies by posting to NYC Jobs website, conducting civil service list calls and other avenues, such as, colleges and universities. The ability to use non-competitive titles and titles that did not have active lists, allowed OATH to fill many of its support vacancies quickly. In FY 2025, OATH will continue to conduct proactive outreaches for our legal positions such as reaching out to local law school career offices and expanding our recruitment sources.

Our quarterly review of our underutilization reports will continue to drive our recruitment efforts as needed.

In FY 2025, OATH will continue to encourage Structured Interview Training and Unconscious Bias Training for Hiring Manager.

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.]

OATH’s HR Team will proactively reach out to Agency Executives to remind them of upcoming civil service exams and to encourage their staff to take an exam they qualify for.

OATH’s HR Team will periodically send out Agency Wide Bulletins to all staff reminding them of DCAS’s exam schedule.

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]

Event Date	Event Name	Borough
	None	

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

Borough	Approximate Dollar Amount (\$)
Bronx	\$0.00
Brooklyn	\$0.00
Manhattan	\$0.00
Queens	\$0.00
Staten Island	\$0.00
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. City Bar Associations and Professional Organizations, including Minority Bar Associations, Network of Bar Leaders (NBL), Affinity Bar Collective
2. Posting on our OATH website and Internal Bulletins for current employees only
3. Law Student Groups: National Black Student Association, National Latino/a Law Student Association, Hispanic National Bar Association, National South Asian Law Student Association
4. Posting on NYC Careers-NYCPS
5. Attending Career Fairs
6. Posting on social media: LinkedIn, Monster, Glassdoor, Smart Recruiters, Simply Hired, etc.

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
Urban Fellows	0		M __ F__ Non-Binary __ Other __ Unknown __
Public Service Corps	0		M __ F__ Non-Binary __ wn __
Summer College Interns	5	3- Asian/Pacific Islander 1-Hispanic 1-White	M __ F_5_ Non-Binary __ wn __
Summer Graduate Interns	4	4-White	M _2_ F_2_ Non-Binary __ wn __
Civil Service Pathways Fellows	0		M __ F__ Non-Binary __ Other __ Unknown
Other (specify):			M __ F__ Non-Binary __ wn __

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 1 [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 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.]

☐ 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 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 plans of the agency Career Counselor are as follow:

- Maintain knowledge of the civil service system and respond to inquiries regarding how to apply for civil service exams and/or positions in civil service titles that relate to the employee's intended career path.
- Maintain knowledge of training and professional development programs offered by the agency to encourage the use of these programs to improve skills, performance, and career opportunities.
- Maintain knowledge of approved job vacancies within the agency and navigate inquiries from employees on how to apply for these positions.
- Actively review policies, procedures, and practices related to hiring (including vacancy announcements, use of certification lists, and the selection process for mission critical occupations).

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.]

OATH has been diligently working with the Mayor's Office of Racial Justice on the 2024 initiatives to include an improvement to OATH's internal procedures. OATH has submitted an action plan to include DEI and hiring manager training, outreaches to diversify the applicant pool, and transparency of policies that are currently being reviewed by the team at City Hall.

C. EEO Role in Hiring and Selection Process

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

In FY 2025, the agency EEO Officer will do the following:

- ☒ 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).
- ☒ 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 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 Training for NYC Employees (e-learning)	All employees – Biennially (Cycle 2 must be completed by March 31, 2025.)	Up to 550	February 2025
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.)		
Sexual Harassment Prevention (e-learning)	All employees – Annually (Cycle 7 runs between September 1, 2024 – August 31, 2025)	Up to 550	August 2025
Sexual Harassment Prevention (classroom/live webinar)	All employees – Annually (Cycle 7 runs between September 1, 2024 – August 31, 2025)		

IgbTq – Power of Inclusion (e-learning)	Managers, Supervisors, and Front-line employees (must be completed by March 31, 2026) All other employees	Up to 550	April 2025
IgbTq – Power of Inclusion (classroom/live webinar)	Managers, Supervisors, and Front-line employees (must be completed by March 31, 2026) All other employees		
Disability Awareness and Etiquette			
Structured Interviewing and Unconscious Bias (classroom/live webinar)			
Other (specify)			
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 designee¹ : _____
- ☐ The designee reports directly to the Agency Head.
- ☒ The agency will input the Reasonable Accommodation activity on the DCAS Citywide Complaint and Reasonable Accommodation (CAD) Database and update the information as needed.

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 Local Laws and Mayoral Executive Orders

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

- ☒ The agency plans to train all new employees on Sexual Harassment Prevention within 30 days of start date.
- ☒ The agency will train all current employees on Sexual Harassment Prevention (Cycle 7 – September 1, 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 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 2024.

- ☒ 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 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.

- ☒ 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].

- ☐ The agency is NOT involved in an audit conducted by NYC EEPCC or another governmental agency specific to our EEO practices.
- ☒ The agency is currently being audited or preparing responses to an audit conducted by the EEPCC or _____ [another governmental agency – please specify] specific to our EEO practices. Upon forwarding our responses to the recommendations issued by the EEPCC, the agency will submit to OCEI an amendment letter, which shall amend the agency plan for FY 2024 to include and implement EEPCC 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 EEPCC 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.]

ASIM REHMAN

Print Name of Agency Head



Signature of Agency Head

1/6/25

Date

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

Agency EEO Office mailing address:

66 John Street, 10th Floor, NY, NY 10038

[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']	Sharina DeRoberts	SDeRoberts@oath.nyc.gov	212-436-0524
2.	Agency Deputy EEO Officer [if appointed]	n/a		
3.	Agency (Chief) Diversity & Inclusion Officer [if appointed]	n/a		
4.	Chief Diversity Officer/Chief MWBE Officer per E.O. 59	Arnab Das	ADas2@oath.nyc.gov	212-933-3030
5.	ADA Coordinator	Sharina DeRoberts		
6.	Disability Rights Coordinator	Sharina DeRoberts		
7.	Disability Services Facilitator	Sharina DeRoberts		
8.	55-a Coordinator	Sharina DeRoberts		
9.	EEO Investigator(s)	n/a		
10.	EEO Counselor(s)	Migdalia Nieves Lorna Mondesir	MNieves@oath.nyc.gov LMondesir2@oath.nyc.gov	212-933-3007 718-503-5831

11.	EEO Training Liaison(s)	Ivan Teruel	ITeruel@oath.nyc.gov	212-933-3086
12.	Career Counselor(s)	Marcia Grant	MGrant@oath.nyc.gov	212-933-3038
13.	Other (specify)			