

## **CAMPAIGN FINANCE BOARD**

### **DIVERSITY AND EQUAL EMPLOYMENT OPPORTUNITY PLAN FISCAL YEAR 2022**

#### **I. Introductory, Commitment and Accountability Statement by the Agency Head**

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

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

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

I will hold all CFB employees accountable, especially the top leadership of our agency, EEO Officer, EEO Counselors, human resources professionals, legal professionals, managers, and supervisors, for ensuring that the agency does not discriminate against employees or applicants for employment and support the diversity and inclusion initiatives at the agency by adhering to EEO regulations and actively working toward attaining agency goals in that area. Everyone at the CFB is accountable for complying with the City's EEO Policy and play a part in the effective implementation of the agency's Diversity and EEO Plan for FY2022.

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

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

The Agency EEO Officer, Danica You and Chief Diversity Officer/Chief MWBE Officer (position is currently vacant because the Chief of Staff/ACCO who held this role earlier left the agency recently, but the agency will soon identify an employee who will take on this role) will serve as the primary resources for managers and supervisors by providing best practices and direction in addressing EEO issues. Their contact information will be prominently available to all employees.

Each September, including September of Fiscal Year 2022 (September 2021), I will issue a Commitment Statement to all CFB employees affirming the principles of diversity, inclusion, and equal employment opportunity. The statement is intended to guide managers and supervisors and to communicate to all staff everyone’s responsibilities contributing to the agency’s overall dedication to equity, diversity, inclusion, and related values for all employees. The EEO and Sexual Harassment Prevention Policy Statements and Statement of Commitment from Fiscal Year 2021 are attached to this Diversity and Equal Employment Opportunity Plan as a reference.

**This statement is the same as last year.**

**II. Recognition and Accomplishments**

Describe below key initiatives and accomplishments that your agency undertook last fiscal year (2021) to advance Equal Employment Opportunity, Equity, Diversity, and Inclusion; for example, completing training goals, introducing new equity programs, or launching employee resource groups. Use the Additional Comments section to list more than five items.

In the past year, our agency accomplished the following as part of our commitment to Equal Employment Opportunity, Equity, Diversity, and Inclusion:

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

The 2021 NYC primary elections were historic for the CFB, with the most volume of activity – the agency issued the most public funds in the history of the program. By June 17, 2021, the CFB issued payments to 270 candidates in the 2021 primary elections, totaling \$109,764,381. This amount was more than the total amount candidates reported to have raised in private contributions or by independent expenditure committees (also known as Super PACs). There were also more than 400 total registered candidates.

Because of the wide reach of the CFB's campaign finance program, more candidates qualified for public funds than ever before, which meant that more New Yorkers had the opportunity for this positive financial impact to their campaigns.

In addition to this milestone achievement with respect to public campaign financing, the CFB also undertook significant efforts to advance EEO, diversity, equity, and inclusion to make its civic engagement efforts, and other measures, reach and make an impact in the diverse communities of NYC.

The CFB continued to encourage civic engagement with youth and in immigrant and other underserved communities, despite the additional challenges posed by the pandemic. In FY 2021, the agency conducted online voter registration efforts, coordinated youth-centered events (which moved to an online setting given the restrictions on in-person gatherings), targeted messaging toward youth subgroups (including NYC-native voters, students attending college in NYC, and post-college voters who move to NYC for their first job), translated additional materials into target languages, created more culturally-relevant materials, and built more strategic partnerships to ensure that diverse communities are empowered with access to voting resources. The CFB's commitment to promoting civic engagement in NYC's underserved communities remains firmly in place for FY2022 as a key component of the agency's work.

Because of the pandemic, in-person registration efforts had to cease unexpectedly in FY 2020. Additionally, with no universally accessible online voter registration system available to City voters, the CFB found that new voter registrations in NYC plummeted by 49% as compared to 2016. To address this issue, in the first quarter of FY 2021, the CFB's NYC Votes program announced a partnership with TurboVote (a leading civic technology non-profit that has helped more than 7 million Americans register to vote since 2012) to launch an online platform for voter registration. Although the platform was not a full voter registration platform due to certain state election law restrictions, the platform did streamline the process for any eligible NYC voter to become registered. In the first week the site was launched late in the first quarter of FY 2021, 3,400 New Yorkers began the process of registering to vote using the platform.

Early in FY 2021, the CFB (through its NYC Votes initiative) announced that for the fall election season, NYC Votes would partner with LinkNYC's #ArtOnLink program. Through the partnership, artists submitted original artwork to be featured on the 1,700+ kiosks encouraging New Yorkers to vote. This #ArtOnLink program was part of a broader effort coordinated by NYC Votes and LinkNYC to spread awareness and build excitement for the primary election across the City. The information on the kiosks promoted the October 9,

2020 voter registration day, as well as early voting dates, absentee voting information, and details to help voters find their poll sites.

In the first quarter of FY 2021 (the week of August 24, 2020), the CFB's We Power NYC Ambassadors program delivered presentations about their efforts to mobilize their peers to vote, and group projects focused on issues including urban planning, immigration, education, election reform, gender and queer justice, environmental justice, and racial justice. The goal of the group projects was to research how state and local government influences those issues and to inform other young people about how to get involved in activism addressing those issues. The We Power NYC Ambassadors who worked throughout this quarter were a diverse group of 32 young people aged 14 to 24 years old from all five boroughs of NYC. This enormously successful program, which launched in FY 2020, will continue in FY 2022, including presentations by the Ambassadors in Q1 of FY 2022.

Additionally, the CFB's Voter Assistance Advisory Committee and NYC Votes program hosted the second annual "We the Young People" public hearing in the first quarter of FY 2021 (August 12, 2020). The hearing created a platform for young New Yorkers aged 14 to 25 to testify about increasing civic engagement among the City's youngest voters and future voters. Participants provided testimony in the traditional verbal form but were also encouraged to provide more artistic forms of testimony to convey their and their communities' experiences around voting and other forms of civic engagement (e.g., video submissions, visual art, spoken-word poetry). The testimony is and will continue to be used in the CFB's youth empowerment work in future elections. The third annual We the Young People hearing will take place in the Q1 of FY 2022.

In FY 2021, the CFB launched and executed an education campaign to prepare City voters for Ranked Choice Voting (RCV) in special and primary elections, partnering up with groups serving the City's various diverse communities, including the Mayor's Office of Immigrant Affairs, Disability Rights New York, Hispanic Federation, the NYC Civic Engagement Commission, the NYC Housing Authority, the NY Public Library, and other organizations including community boards, faith-based organizations, and elected officials.

The CFB held RCV training sessions for community organizations throughout FY 2021, utilizing American Sign Language interpretation and closed captioning to increase accessibility to more New Yorkers. The CFB has also produced and distributed RCV training materials in Spanish, Chinese, English, Bengali, Korean, and in large print. Under Local Law 21 of 2021, the CFB mailed an informational postcard to every eligible registered voter to inform them about RCV in advance of the primary election. The CFB also implemented comprehensive advertising campaigns for the special and primary elections. The CFB

distributed social media toolkits including graphics for public use and distribution to spread the word about RCV throughout all five boroughs.

The CFB also mailed the citywide Voter Guide to every eligible voter at the beginning of June 2021. This coincided with a relaunch of the voting.nyc website, completely redesigned to create new tools for voters and improve the voter experience around getting information about candidates and elections. The CFB promoted this new resource through a citywide multichannel advertising campaign, focusing in underrepresented areas of the city with lower voter turnout.

The CFB also conducted text banks as part of the education campaign, in partnership with DemocracyNYC. CFB staff and volunteers reached 600,000 lower-propensity voters with cell phones, urging them to get to the polls and asking if they had any questions about voting. In FY 2022, this work will continue leading up to the November 2021 general election and future special elections.

2. *Strengthened Measures to Increase Accessibility.* In FY 2021, the CFB took concrete steps toward improving accessibility to information, activities, and programming, for all New Yorkers. Specifically, the CFB forged a partnership with the Mayor’s Office for People with Disabilities in FY 2021 to work together to improve access to the CFB. For example, when developing the NYC Votes Contribute tool, the CFB engaged the MOPD in the application testing stage, to provide feedback on how to make the tool more user-friendly, specifically from the perspective of people with disabilities. NYC Votes Contribute is a first-of-its kind platform, a fundraising tool for candidates built as a public good. The CFB created the tool with the idea of using technology to extend the agency’s core small-dollar matching funds program. The tool simplifies the process of collecting small contributions online, making powerful fundraising tools freely available to all candidates. This ties in directly with the CFB’s diversity, equity, and inclusion efforts by making it easier for candidates of all backgrounds to qualify for matching funds and build a viable campaign for public office with the support of small-dollar contributors from their friends and neighbors.

The CFB also implemented measures to make the 2021 primary election debates more accessible to New Yorkers who are blind or have low vision. Specifically, the CFB worked with debate sponsors and candidates to provide visual descriptions of the debate sets and to collect visual descriptions for candidates who participated in the debates and distributed those descriptions prior to the debates. The CFB also introduced visual descriptions at the Voter Assistance Advisory Committee’s first post-primary election meeting, with meeting participants providing short visual descriptions of themselves prior to speaking. For both the debates and the VAAC meeting, CFB staff also worked diligently to ensure that any visual

aids/graphics used were paired with visual descriptions. The CFB partnered with MOPD and Disability Rights New York in these efforts and in FY 2022 will continue to work on how to expand accessibility to people who are blind, have low vision, or have another disability.

In FY 2022, the CFB plans on updating its main website to incorporate feedback from the MOPD on how to make the information more accessible in accordance with the Web Content Accessibility Guidelines (WCAG) and also to identify other public electronic content that might be able to be improved under those guidelines. The EEO Officer participates in monthly meetings with MOPD in order to stay abreast of any additional accessibility-related issues that might be relevant to the agency.

- Took Proactive Measures to Utilize MWBEs.* Although the CFB is a non-mayoral agency and therefore exempt from the City's MWBE (minority/women owned business enterprise) goal-setting requirements, the CFB recognizes the importance of utilizing MWBE certified vendors and has continued to take proactive measures to utilize these vendors. The CFB firmly believes that MWBEs are businesses that contribute greatly to and drive our City's economy and use of their goods and services should be properly reflected in government contracting, including at the CFB. As such, the agency adheres to the practice of including MWBE certified vendors in all CFB solicitations, reaching out to more than the number of MWBEs recommended by DCAS.

During FY 2021, the CFB sent out RFPs for two contracts out to more than 200 MWBEs. The CFB also contracted with more than 20 MWBEs in that fiscal year. The CFB plans on continuing its robust efforts to utilize MWBEs in Fiscal Year 2022, particularly once a new Agency Chief Contracting Officer (ACCO) has been hired.

- Continued the Work of the Diversity and Inclusion Committee.* During FY 2021, the D&I Committee held two meetings (meetings did not take place during the EEO Officer's parental leave). During last fiscal year, the Committee highlighted DEI events, either through events, bulletin board materials, monthly emails to all staff, or posts to the agency's intranet.

The Committee also continued to engage in meaningful discussions around institutional racism, the Black Lives Matter movement, and related issues (including how to best support each other and colleagues). Throughout the fiscal year, the Committee provided resources to staff on DEI-related issues, including resources for Asian Pacific Islander staff and allies considering the rise in violence against the API community. The Committee, as well as the Executive Director, provided statements to all staff emphasizing the rights, resources, and protections that all staff have against discrimination and harassment.

5. *Continued the Work of the Caregiver Support Group.* This group is a resource for staff who are caregivers or who are interested in issues impacting caregivers, such as how to work toward a better work/life balance, and how to prepare for long-term elder care needs. The group normally meets 2-3 times annually and usually hosts an annual Bring Our Children to Work Day (this could not happen during FY 2020 or FY 2021 due to the pandemic). During the period of work from home, the group has had a few meetups and check-ins via Microsoft Teams.

***Continued in “Additional Comments” Section***

The agency recognizes employees, supervisors, managers, and agency units demonstrating superior accomplishment in diversity, equity, and equal employment opportunity through the following:

- Diversity & EEO Awards\*
- Diversity and EEO Appreciation Events\*
- Public Notices
- Positive Comments in Performance Appraisals
- Other: During staff meetings and on the agency Intranet as appropriate

*\* Please specify under “Additional Comments”*

- The agency will continue to recognize employees, supervisors, managers, and agency units demonstrating superior accomplishment in diversity and equal employment opportunity in FY 2022.

***Additional Comments (continued from earlier in Section II):***

6. *Continued Adherence to Updated Hiring Policy and Merit Increase and Promotion Policy.* The agency created and distributed a formal merit increase and promotion policy during FY2020 as part of efforts to establish fair and transparent guidelines that provide equal access to merit and promotional opportunities to all staff and continues to adhere to the policy. Additionally, in FY2020 the CFB created and implemented an updated hiring policy to make the hiring process more open and equitable. For example, the agency’s updated policy now requires that an EEO/HR representative participate in at least one stage of every hiring process. It also requires that hiring managers create and submit hiring plans that outline each step of the hiring process, including criteria used for candidate selection and pre-preparing documents including job descriptions, key responsibilities, and structured interview questions, to better ensure consistency and equity throughout the agency’s hiring processes. The CFB will continued to adhere to the hiring and merit increase and promotion policies in FY 2021 and will continue to do so through the next fiscal year and beyond.

7. *Promoted CFB Staff with Diverse Experiences and Attributes.* Eight CFB employees were promoted in fiscal year 2021. Of the total promoted employees, one identified as female, two identified as both female and a racial minority (Asian or Black), and three identified as a racial minority (Asian or Black). These numbers are illustrative of only some of the CFB’s diversity. The CFB plans on continuing with its ongoing efforts to promote staff with diverse experiences and attributes in FY 2022.
  
8. *Completed Training Goals.* In FY 2021/early FY 2022, the agency, in partnership with DCAS, electronically deployed the City’s Sexual Harassment Prevention, Transgender Inclusion, Corruption Prevention Awareness (Department of Investigations), and Conflicts of Interests (Conflicts of Interest Board/DOI) trainings to all staff. Going forward, the agency will deploy these trainings on an annual or biannual basis, depending on the training’s completion requirements as established by DCAS.

**III. Workforce Review and Analysis**

**Please provide the total agency headcount as of 6/30/2021**

**Total Headcount: 121**

**Please provide the number of employees whose Race/Eth is ‘Unknown’: 5**

1. 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 2022, 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
- Newsletters and internal Agency Publications”
- 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 2022, the agency will inform and remind employees of the option to add preferred name in ESS.



*Additional Comments:* In FY 2022 the EEO Officer will coordinate with Human Resources to update categories in ESS covered in the CFB’s self-identification form for those employees who took part in the selection process for their positions once the self-identification form was implemented by the agency. Because the CFB is a non-mayoral agency and the Office of Management and Budget does not have oversight over the agency, the CFB does not utilize the NYC Jobs website and therefore collects its own self-identification forms.

- 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.

**NOTE:** If necessary, the agency can reach out to DCAS OCEI for guidance on interpreting their underutilization reports. However, it is the agency’s responsibility to use that data to inform the formulation of 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’ Office of Citywide Equity and Inclusion (OCEI) 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.

Reviewed with	Frequency
Agency Head	<input checked="" type="checkbox"/> Quarterly <input type="checkbox"/> Semi-Annually <input type="checkbox"/> Annually <input type="checkbox"/> Other _____
Human Resources	<input checked="" type="checkbox"/> Quarterly <input type="checkbox"/> Semi-Annually <input type="checkbox"/> Annually <input type="checkbox"/> Other _____
General Counsel	<input checked="" type="checkbox"/> Quarterly <input type="checkbox"/> Semi-Annually <input type="checkbox"/> Annually <input type="checkbox"/> Other _____
Other (___specify)	<input type="checkbox"/> Quarterly <input type="checkbox"/> Semi-Annually <input type="checkbox"/> Annually <input type="checkbox"/> 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).
- The agency reaches out to DCAS to serve as a resource in identifying strategies and best practices to address barriers to entry as well as to receive guidance concerning the interpretation of underutilization reports.

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

**IV. EEO, Diversity, Inclusion, and Equity Initiatives for FY 2022**

1. Proactive Strategies to Enhance Diversity, Equity, Inclusion and EEO in areas of Workforce, Workplace, and Community.

State below the central goals of your strategy for FY 2022 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. Workforce goals are directed at the composition of your workforce, recruitment, retention, promotion, and professional development. Workplace goals have to do with inclusion, workplace culture, and employee activities. Community goals are directed at the external environment of your agency: the public and entities served by the agency. Describe special initiatives to enhance equity and focus on race relations in item 4.

**1. Workforce:**

The CFB will support and maintain a diverse, high-performing workforce by cultivating an inclusive workplace that enables full participation through strategic outreach, educational measures, and other policies and practices that will support the recruitment, promotion, and retention of staff with diverse experiences and attributes.

Specifically, the CFB will strengthen its professional development efforts in FY 2022. The Human Resources Director will implement a training program for all supervisors using DCAS curriculum, including:

- Civil Service 101
- Difficult Conversations
- Fundamentals of Management
- Stress Management/Coping Skills
- Identifying Needs and Developing Staff

The agency will also continue to support the professional development of its staff by paying for approved courses that are relevant to an employee’s work at the agency and meets the requirements of the Comptroller’s Directives.

With respect to training, in FY 2022, the EEO Officer will also update or create a new unconscious bias in hiring training for all CFB employees who are involved in the agency’s hiring process, regardless of which stage of the process.

The EEO Officer will partner with the HR Director and other agency leadership as necessary to implement DCAS’s Diverse and Inclusive Recruitment Best Practices, as established in the first quarter of FY 2022. The CFB will also add additional practices as necessary to help build

a diverse and inclusive workforce.

The agency will continue to regularly analyze the composition of its workforce, as well as demographic information provided by job applicants and staff selected for promotion, to understand how that information might influence certain practices and programs adopted by the agency.

Additionally, the EEO Officer will work with the HR Director and other agency leadership as necessary to determine whether additional programs and policies might be implemented in FY 2022 to address the workforce, recruitment, retention, promotion, and professional development needs of the agency, including, for example, mentorship/sponsorship programs and additional trainings.

## **2. Workplace:**

During the 2022 fiscal year, the EEO Officer will create a diversity, equity, and inclusion strategic plan for the agency, which will largely focus on internal efforts as a starting point. This will include taking a step back and re-visiting some foundational issues: creating a new DEI mission and vision statement (including a mission and vision statement for the agency's DEI committee), creating a better framework for the agency's DEI work (including identifying clear metrics, objectives, and tasks for measuring progress), defining specific strategic DEI initiatives and creating timelines for those initiatives – all with an eye toward improving workplace culture, including a more inclusive work environment where employees feel able to show up and be recognized as their whole selves.

In FY 2022, the CFB will also add on a new element to the performance evaluation process, where managers will receive feedback (via the Executive Director) on their work as a supervisor from others, including subordinates. The goal is that this information will help create a better work environment for all employees, recognizing what is working well and what areas have room for improvement. Participation in the process will be voluntary.

## **3. Community:**

*Strengthen Efforts to Encourage Civic Engagement with Youth, Immigrant, and Other Underserved Communities.* In FY 2022, the CFB will continue to encourage civic engagement with youth and in immigrant and other underserved communities. In the past, with extra emphasis for the City's largest election so far – the 2021 primary election - the agency conducted voter registration drives, coordinated youth-centered events, targeted messaging toward youth subgroups (including NYC-native voters, students attending college in NYC, and post-college voters who move to NYC for their first job), translated additional materials into target languages, created more culturally-relevant materials, and built more strategic

partnerships to ensure that diverse communities are empowered with access to voting resources. The CFB's commitment to promoting civic engagement in NYC's underserved communities remains firmly in place for FY2022 as a key component of the agency's work.

*Continue Taking Proactive Measures to Utilize MWBEs.* As stated above, although the CFB is a non-mayoral agency and therefore exempt from the City's MWBE goal-setting requirements, the CFB recognizes the importance of utilizing MWBE certified vendors and will continue to take proactive measures to utilize these vendors, including ensuring that MWBE certified vendors are a part of in all CFB solicitations, reaching out to more than the number of MWBEs recommended by DCAS. The CFB will hire a new ACCO in FY 2020 and will ensure that they take on a leadership role in ensuring that MWBEs are utilized.

#### **4. Equity and Race Relations Initiatives:**

This is a pivotal time in history, set off in 2020 with the start of the coronavirus pandemic (along with acts of unfairly associated acts of violence and discrimination against members of the Asian American Pacific Islander (AAPI) community), as well as specific acts of violence against Black people that revealed the dramatic impacts of systemic racism and other acts of inequity to many people who did not already have a deep awareness of or experience with discussing these issues. These difficult situations impacted many people on a personal level, including the CFB's own employees, and caused some to question how institutions, including City agencies, might perpetuate systemic racism and other inequities.

These events pushed the agency's Executive Director to issue statements to all staff relating to the Black Lives Matter movement, the rise in violence against the AAPI community, and affirming her and the agency's strong stance against discrimination in any form, including a commitment to ensuring that discriminatory actions and attitudes do not transmit into the workplace so that the agency can ensure a safe and respectful work environment. During FY 2020-2021, the agency also hosted online events for staff to process these issues as a community, as well as provided resources to all staff pertaining to equity and race relations, including training information, mental health, and other support options.

For FY 2022, the CFB wants to grow in terms of how it addresses issues of equity and race relations. The Diversity and Inclusion Committee began researching potential anti-racism and unconscious bias trainings. Beyond that, the DEI strategic plan that the EEO Officer will draft in FY 2022 and ultimately work with agency leadership and others to finalize and adopt (see "Workplace" section above), will be an essential way for the agency to strategically address matters involving equity and race relations.

The CFB acknowledges that it has a responsibility to address issues of equity and race relations head on, is committed to ensuring that the agency uses its resources and influence to make improvements, and looks forward to working with others, including DCAS, on how to make these positive changes as City agencies.

2. Describe the ongoing and new programs, actions, and initiatives planned for FY 2022, 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.**

The agency will address underutilization in FY 2022 by:

- Expanding internal and external applicant pools to address the underutilization through outreach strategies for broader recruitment.
- Launching outreach efforts to inform and encourage applications for the upcoming civil service examinations.
- Using the quarterly workforce report and dashboard to identify specific job groups where underutilization exists and guide recruitment efforts.
- The agency will implement the following strategies to address the impending retirement of employees and possible loss or gap in talent:
  - Integrate succession planning in the agency activities to develop a pipeline, facilitate a seamless transition and continuity of service, especially for critical managerial positions.
  - Encourage agency employees to take promotional civil service examinations.

The agency will implement the following initiatives to develop and retain employees:

- Identification of Ready Now & High Potential Talent.
- Institute coaching, mentoring and cross training programs.

- Implement initiatives to improve the personal and professional development of employees.
- Conduct assessment to ensure pay and promotions are equitable.

*Describe specific actions designed to enhance equity:*

For FY 2022, the CFB will continue to monitor and address underutilization within the agency based on data provided by DCAS but also by analyzing the “managers” category more broadly than the workforce reports, which are based on federal occupation classifications that do not capture all staff who are in a supervisory role to one or more staff. This will help the agency better monitor underutilization in a way that aligns with the work of the agency, which will help with our equity analysis.

Enhanced training efforts will help the agency improve its equity efforts. Specifically, mandating transgender inclusion training for all employees, the Everybody Matters training for all new employees, and the Structured Interviewing and Unconscious Bias training for all employees involved in the hiring process, in addition to the sexual harassment prevention training that is already mandated for all employees is a step in the right direction toward enhancing the agency’s equity efforts. Additionally, as mentioned above in Section IV (1)(1), the CFB’s Director of Human Resources will implement a training for all supervisors using DCAS curriculum, which the agency hopes will help equip its managers to better support staff and make decisions fairly.

The CFB will also revisit its policies including those addressing hiring, promotions, and merit increases, making sure that decisions are made through an equity lens as these areas are essential to creating a fair and equitable work environment for all employees and potential employees.

*Additional Initiatives, Programs, or Comments:*

The CFB is in the process of seeking approval for its civil service title proposal for permanent titles and hopes that significant process will be made in FY 2022 by the NY State Civil Service Commission to review, consider, and approve the proposal. However, in the interim, the CFB will continue to provide civil service examination and other civil service-related information to staff.

**B. WORKPLACE:**

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

The agency will take initiatives to create an inclusive work environment that values differences, and to maintain focus on retaining talent across all levels.

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

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

Agency Diversity and Inclusion Committee is in existence and active.

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

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

Agency will keep employees informed of the EEO complaint and reasonable accommodation processes and circulate *DCAS EEO Complaint Procedural Guidelines and Reasonable Accommodations Procedural Guidelines*.

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

In FY 2021, the agency conducted the following survey(s) to improve the recruitment, hiring, inclusion, retention and advancement of people in underrepresented groups:

- Engagement /Job Satisfaction/ Employee Morale Survey(s)
- Workplace Insight Survey for Exiting (WISE) Managers
- Exit interview or surveys developed by the agency
- Other (specify): \_\_\_\_\_

The agency will adopt in FY 2022 the following initiatives based on the analysis of the results of these survey(s):

1. N/A

*Describe specific actions designed to enhance equity and initiatives to address race relations in the agency:*

See Sections IV (1)(4) and IV(2)(A) above.

**C. COMMUNITY:**

**In addition to the strategic goals above, please indicate here specific actions and initiatives planned with respect to Community.**

In FY 2022, 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.
- Identify best practices for establishing a brand of inclusive customer service.
- Undertake initiatives to improve community relations, community awareness, and to engage communities being served in recruitment efforts, service development and delivery.
- Expand language services for the public.

*Describe specific actions designed to enhance equity:*

The CFB is diligent about establishing procedures that result in equitable, inclusive, and consistent service to campaigns. For example, the CFB’s Candidate Guidance and Policy unit accepts candidate documentation online and has clear procedures to ensure that each form submitted by a campaign receives the same level of review. Staff in the Candidate Guidance and Policy unit, who have the most direct interaction with campaigns, also take courses at DCAS focused on how to work with members of the public.

The CFB will continue to promote accountability, education, and communication on diversity and inclusion with employees, leaders, and stakeholders. With significantly increased EEO, diversity and inclusion training, and other related programming (at least once per quarter), employees will better appreciate the importance of diversity and inclusion, which will empower the agency to better perform its work, aimed at benefitting the citizens on New York City as a whole.

*Additional Initiatives, Programs or Comments:*

The CFB circulates a survey after every election asking all campaigns for their opinions and suggestions about their experiences with the CFB. The information is then used to improve CFB procedures, training materials, technology, and more.

The CFB also administers a survey after each training to candidates and campaign staff asking for feedback on their training experiences. CFB staff also conducts focus groups on the agency’s online applications to obtain feedback and suggestions for improvements to those systems.



## V. Recruitment

### A. Recruitment Efforts

1. Summary of Recruitment Efforts – Include steps that will be taken to give notice to all employees of discretionary job postings within the agency as well as proactive efforts/strategies planned to market positions externally.

The agency will implement the following recruitment strategies and initiatives in FY 2022:

- Review policies, procedures, and practices related to targeted outreach and recruitment.
- Utilize Inclusive Recruitment Guide Issued by the Office of Citywide Equity and Inclusion to develop strategic recruitment plans.
- Review underutilization in job groups to inform recruitment efforts.
- Identify resources to bolster efforts aimed at increasing the effectiveness of diversity recruitment.
- Put in place an operating, up-to-date, accessible website, mobile application and social media presence related to EEO protection and rights.
  - Currently in operation.
- Assess agency job postings to ensure new diversity, inclusion, and equal opportunity employer messaging is included.
- Share job vacancy notices with the Mayor’s Office for People with Disabilities at [nycatwork@mopd.nyc.gov](mailto:nycatwork@mopd.nyc.gov), (212) 788-2830 and ACCES VR by sending the job vacancy notices to Maureen Anderson at [Maureen.Anderson@nysed.gov](mailto:Maureen.Anderson@nysed.gov) (212) 630-2329 so they can share it with their clients.
- Reach out to the DCAS Office of Citywide Recruitment (OCR) as a resource at [citywiderecruitment@dcas.nyc.gov](mailto:citywiderecruitment@dcas.nyc.gov)
- If your agency is an eHire agency, post ALL vacancies on NYC Careers.
- Ensure that agency personnel involved in both the discretionary and the civil service hiring process have received:
  - Structured Interviewing training
  - Unconscious Bias training
  - Everybody Matters EEO and Diversity and Inclusion Training
- Assess recruitment efforts to determine whether such efforts adversely impact any particular group.

*Additional Strategies, Initiatives and Comments:*

The CFB is eager to implement ideas outlined in DCAS’s August 2021 Inclusive Recruitment Guide.

The agency will determine whether it is feasible or necessary (given the small size of the agency) to put in place an operating, up-to-date, accessible website, mobile application, and social medial presence related to EEO protections and rights, once the agency’s Chief Technology Officer has been onboarded and is able to address the issue.

**B. Recruitment Sources**

Diverse Recruitment Source(s)	What sort of return do you expect to see from the effort? Indicate if this source yielded diverse applicant pools.
1. Monster Diversity	The CFB expects to continue to receive responses to job postings from applicants from a wide demographic range  <input checked="" type="checkbox"/> Previous hires from this source
2. Professional organizations with diversity-based groups (for example, the National Association of Black Accountants for an open auditor position)	The units that have consistently done this type of outreach have had past hires from these sources. For FY 2022, hiring managers, the Executive Team and other agency leadership will be encouraged to explore these types of outreach options when positions are open.  <input checked="" type="checkbox"/> Previous hires from this source
3. School affinity groups	For FY 2022, hiring managers seeking to fill entry-level positions will be encouraged to reach out to NYC-area schools via affinity groups or other relevant organizations to broaden the hiring pool.  <input type="checkbox"/> Previous hires from this source

**C. Internships/Fellowships**

Indicate the type of internship/fellowship opportunities available at your agency. Please provide the number of student interns/fellows employed in FY 2021 and their demographic profiles, based on self-ID data. Indicate your plans to provide internship/fellowship opportunities in FY 2022.

The agency provided the following internship opportunities in FY 2021:

Type of Internship\Fellowship	Total	Race/Ethnicity* [#s] * Use self-ID data
1. Urban Fellows	1	Asian
2. Public Service Corps		
3. Summer College Interns		
4. Law School Interns (Legal – Q1 only)	2	Undisclosed (1), White (1)
5. Law School Extern (Legal – Q3 only)	1	White (1)
6. Law School Interns (Legal – Q4 only)	2	Asian (1), White (1)
7. Public Affairs Intern (Q2 only)	2	Undisclosed (1), White (1)
8. Other (specify): We Power NYC Youth Ambassadors (Q4 only)	14	Asian (5), White (3), Black (2), Hispanic/Latinx (1) 2+ races (2), undisclosed (1)

**\* Self-ID data is obtained by EEO Office from NYCAPS.**

The agency will utilize the internship/fellowship programs to improve a pipeline of candidates from underutilized groups for entry-level positions, including in mission-critical occupations.

The agency has hired former interns/fellows.

The agency plans to provide internship/fellowship opportunities in FY 2022.

**Additional Comments:**

There are many internship opportunities available at the CFB, particularly during an election year. The agency is comprised of many units, and internship opportunities are available within many of these units. Depending on the unit, interns can work on press-related matters, gain legal experience, do field work to increase voter registration and participation, or other tasks relating to campaign finance and/or elections. The CFB has hired interns for full-time positions in the past and plans on continuing to do so for those who qualify and are selected as the top candidates for open positions.

**D. 55-a Program**

Section 55-a of the New York State Civil Service Law allows a qualified person with a certified mental or physical disability to be hired into a competitive civil service position without having to take 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.

1. Please discuss plans to utilize the 55-a Program to hire and retain qualified individuals with disabilities.

As a non-mayoral agency, the CFB has its own unique, CFB-specific civil service titles and therefore does not participate in the 55-a Program. The agency currently is in the process of seeking approval for its civil service title proposal for permanent titles. The agency currently does not have any 55-a Program participants on staff.

- 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.

2. Indicate the goals of your 55-a Program Coordinator for FY 2022. Also include your agency plans to do the following: participate in career and job fairs; use internship, work-study, co-op, and other programs to attract a pool of diverse 55-a program applicants; and promote and encourage 55-a program participants to take civil service examinations.

The agency uses the 55-a Program to hire and retain qualified individuals with disabilities and plans to utilize the 55-a Program to hire and retain qualified individuals with disabilities in FY 2022.

Currently, there are \_\_\_\_ [number] 55-a participants.  
 There are \_\_\_\_ [number] participants who have been in the program less than 2 years.  
 Last year, a total of \_\_\_\_ [number] new applications for the program were received and \_\_\_\_ participants left the program due to [state reasons] \_\_\_\_\_.

If there have been no new participants in the program for less than two years, please indicate initiatives taken to hire new 55-a employees.

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The agency will actively educate hiring managers about the 55-a program and the benefits of hiring individuals with disabilities.

Based on the June 7, 2016, 55-a memorandum, issued by DCAS, the agency will carefully evaluate each request by longtime provisional employees for designation under §55-a to serve non-

competitively in a competitive title position to ensure that the request is not made solely to avoid the consequences of Civil Service Law §65(3). In addition, the agency will reiterate to provisional staff that 55-a certification should not be used as a substitute for passing a civil service exam. The agency will encourage 55-a participants to take civil service examinations.

The agency plans to participate in career and job fairs and use internship, work-study, co-op, and other programs to attract a pool of diverse 55-a program applicants.

The goals of the 55-a Coordinator for FY 2021 are:

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

These goals are the same as last year.

*Additional Goals, Initiatives, and Comments:*

N/A.

## VI. Selection (Hiring and Promotion)

**NOTE: This section must be prepared in consultation with the Agency Personnel Officer.**

### A. Career Counselors

For FY 2022, if your agency is fiscally able to hire new employees and/or backfill open positions, please discuss the planned duties of the agency Career Counselor(s) with regard to advising employees of opportunities for promotion as well as overall career development.

The CFB’s Career Counselor (the agency’s Director of Human Resources) is always available to meet with staff about career development. Employees interested in a position can (and have) made appointments with the Career Counselor to discuss what positions might be well-suited for them and how to plan for overall professional growth.

The CFB has a human resources-focused hub on its Intranet for all employees to have continuous access to career development and other related information, such as information about trainings and open civil service examinations. CFB employees are encouraged to attend trainings, acquire certifications, and take on new projects and/or responsibilities to further develop their skills, which increases their value to the agency, and may enable them to grow into other opportunities.

In FY2022, the agency, through the Diversity and Inclusion Committee, has tentative plans to explore mentorship and sponsorship programs to help employees with various career development goals.



In FY 2022, the agency’s Career Counselor will perform the following tasks:

- Review policies, procedures, and practices related to hiring (including vacancy announcements, use of certification lists, and the selection process for mission critical occupations).
- Promote employee awareness of opportunities for promotion and transfer within the agency.
- Arrange for agency wide notification of promotional and transfer opportunities.
- Encourage the use of training and development programs to improve skills, performance and career opportunities.
  - Provide information to staff on both internal and external Professional Development training sources.
  - Explain the civil service process to staff and what it means to become a permanent civil servant.
  - Provide technical assistance in applying for upcoming civil service exams.
- Provide agency staff with citywide vacancy announcements, civil service exams notices and other career development information.
- Assist employees and Job Training Program participants in assessing and planning to develop career paths.
- Provide resources and support for:
  - Targeted job searches
  - Development job search strategies
  - Resume preparation
  - Review of effective interview techniques
  - Review of techniques to promote career growth and deal with change
  - Internship exploration

*Additional Initiatives and Comments:*

N/A



**B. New Hires and Promotions**

Monitoring, review, and assessment of the current new hire and promotional procedures for selection, especially for mid- and high-level discretionary positions.

In FY 2022, the agency will do the following:

- Review, revise and/or develop a protocol for in-title promotions and salary increases.
  - Promotion and salary increases protocols in existence.
  - Assess the criteria for selecting/promoting persons for mid-level to high level positions.
- Publicly post announcements for all positions, including senior level positions.
- Actively reach out to networks of underrepresented groups as part of its outreach.
- Reach out to the Mayor’s Office of Appointments for help to identify diverse pools of talent and additional networks for finding qualified candidates.
- Compare the demographics of current employees to the placements.
- Ensure promotion justification is included in all promotion requests.
- Review and analyze the demographics race\ethnicity and gender for those who received the promotion\salary raises to ensure such practices are equitable.
- Review on a regular basis the demographics of those who received promotion and share the information with the agency head and Human Resources (by EEO Officer).
- Monitor the results of action plans for any changes in the agency workforce including increases or decreases in applications of qualified applicants and selection rates.

*Additional Comments:*

There are a limited number of positions that the agency only posts internally.

### C. Selection Process

Identify the steps that are taken to ensure that selection process is objective, and job related.

During FY 2022, the agency will do the following:

- ☒ 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.
- ☒ EEO Officer is asked to review the interview questions.

#### *Additional Comments:*

Since the 1<sup>st</sup> Quarter of FY2021, the CFB implemented a new hiring process that requires that all hiring managers provide a core leadership team, consisting of the Executive Director, EEO Officer, and Human Resources Director, with key hiring documents for review prior to approval and posting: Job description, key responsibilities, structured interview questions, and a hiring plan. The team reviews the documents to better ensure that the hiring process is equitable for all job applicants and best captures the specific agency needs that resulted in the position being available. For example, the team reviews the job description, key responsibilities, structured interview questions, and any other hiring criteria to ensure that everything ties together, and that hiring requirements and other criteria used when determining eligibility for a position are included in the job description.

Additionally, the EEO Officer or one of the EEO Counselors participate in every hiring process for an open position by sitting in on one round of interviews for each applicant selected for an interview. After the hiring process has concluded, the EEO Officer or EEO Counselor meets with the hiring manager to discuss how the process went and offer advice on managing future hiring processes, and to solicit input on potential improvements to the process and other related issues.





Additionally, the EEO Officer reviews the resumes of all job applicants selected for interviews to ensure that minimum required job qualifications are met.

Also, as part of the updated hiring process, first-round interviews must involve a minimum of two interviewers. The Executive Team member for the unit/division engaged in a hiring process must, at minimum, meet with the top recommended applicant for the position prior to conducting reference checks.

Because the CFB is a non-mayoral agency and cannot utilize the eHire system due to that independent status, the agency utilizes its own EEO voluntary self-reporting identification form. One of the agency’s administrative assistants (who is not involved with the job applicant selection process) distributes and collects the information from applicants. The information is then given to the EEO Officer for analysis once the job selection process has concluded.

The CFB is also in the process of determining how its new internal human resources information system can also be used to track job applicants and employees, including data that will assist the agency in more effectively monitoring who applies and is hired, who receives promotions, and other information integral to creating and sustaining a diverse workforce.

**D. Review of Hiring, Promotion, and Selection Practices**

For FY 2022, what steps will your agency take to review the positions filled during the year?

- A. Discuss your current practice in utilizing the NYCAPS Applicant Interview Log reports to identify applicants by gender and race/ethnicity.
  - The agency will use the NYCAPS Applicant Interview Log Report to track applicant sources and identify the best sources of applicants.
  - The agency does not use the NYCAPS Applicant Interview Log Report.
  - The agency will schedule orientation with NYCAPS Central.
  
- B. Discuss all planned steps taken to identify barriers to entry for positions and actions under consideration to address such barriers.
  - Identify at least two or three people from diverse gender and racial\ethnic backgrounds to review received applications.
  - Ensure hiring panels are composed of staff from diverse backgrounds (e.g., diversity based on experience, gender, age, race, and ethnicity).
  
- C. When identifying groups of subject matter experts to assist the DCAS test development team in creating civil service exams, please describe efforts that will be taken to select a diverse and inclusive group of individuals in the test development process:

- The agency will identify a diverse group of subject matter experts (e.g., race, gender, age, assignments location, etc.) when requested by DCAS.
- The agency will use objective job-related criteria to identify the subject matter experts who will participate in test development.
- The agency will make an effort to ensure different staff members are given the opportunity to participate in test development.

*Additional Comments:*

Because of the agency’s non-mayoral status, the CFB uses its own interview log and voluntary EEO self-identification form to identify and maintain information on applicants’ demographic information, rather than via eHire or another Citywide system.

The hiring manager reviews received applications and most units also has at least one additional person review these documents as well, including other employees and/or the EEO Officer. In FY 2022, the CFB will evaluate whether the agency should build in a more defined process for the application-review stage in the hiring process.

**E. EEO Role in Hiring and Selection Process**

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

In FY 2022, the agency EEO Officer will do the following:

**PRE-SELECTION:**

- Collaborate with the Director of Human Resources to ensure that an updated listing of sources for diverse applicants, including schools and professional organizations, is maintained.
- EEO reviews vacancy postings to ensure elimination of language that has the potential for gender stereotyping and other unlawful discrimination. (It is recommended to use gender-neutral terms and pronouns).
- Actively monitor agency job postings.
- Ensure all job postings include updated EEO Employer statement released in 2021.
- EEO is consulted 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.
- Advise Human Resources in the development of a comprehensive guide for hiring managers.
- 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.
- Other: \_\_\_\_\_

**POST-SELECTION:**

- 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.
- Perform advisory role to Human Resources in the selection process and conduct post-audit review.
- Review hiring package to evaluate that the selection process was conducted in accordance with EEO best practices.
- Other: \_\_\_\_\_

*Additional Comments:*

Although the CFB does not utilize the eHire system, the agency does carefully monitor demographic trends and potential EEO concerns. As outlined in more detail above, the EEO Officer is part of the core leadership team (along with the Executive Director and Director of Human Resources) who review key hiring documents prior to the approval and posting of any open job. The EEO Officer also usually meets with hiring managers before and after most hiring processes, and the EEO Officer or one of the two EEO Counselors will participate in one interview stage for every open position at the agency.

**F. 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 2022.
- 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.)	Target Number of Participants	Targeted Dates
1. Everybody Matters – EEO and Diversity & Inclusion (e-learning)	All New Employees – mandatory as part of new employee onboarding; optional for existing employees. Will be given the option to participate via e-learning module or live webinar.	All New Employees	Within first 30 days of employment.
2. Everybody Matters – EEO and Diversity and Inclusion (classroom/live webinar)	All New Employees – mandatory as part of new employee onboarding;	All New Employees	Within first 30 days of employment.



	optional for existing employees. Will be given the option to participate via e-learning module or live webinar.		
3. Sexual Harassment Prevention (e-learning)	All Employees - Mandatory (between both the e-learning and live webinar options).	All Employees (121 as of end of FY 2021, between both the e-learning and live webinar options).	New employees will complete the training within the first 30 days of employment. They will be given the option to complete the training electronically or via live webinar, if the latter is available. All other employees will complete the training prior to the 2022 cycle deadline. The training will be deployed, with DCAS's assistance, in July 2022.
4. Sexual Harassment Prevention (classroom/live webinar)	See immediately above.	See immediately above.	See immediately above.
5. IgbTq – Power of Inclusion (e-learning)	All Employees - Mandatory (between both the e-learning and live webinar options).	All Employees (121 as of end of FY 2021, between both the e-	New employees will complete the training within the first 30 days of employment.



		learning and live webinar options).	They will be given the option to complete the training electronically or via live webinar, if the latter is available. All other employees will complete the training prior to the 2022 cycle deadline. The training will be deployed, with DCAS's assistance, in July 2022.
6. IgbTq – Power of Inclusion (classroom/live webinar)	See immediately above.	See immediately above.	See immediately above.
7. Disability Etiquette	Optional for all employees.	40+ employees.	By the end of FY 2022. The agency is in touch with an MOPD representative to organize this training, preferably before the end of calendar year 2021.
8. Structured Interviewing and Unconscious Bias (classroom/live webinar)	All employees involved in the hiring process.	All employees involved in the hiring process.	By the end of calendar year 2021; every two years after that.
9. Annual EEO Counselor Training	EEO Counselors. Annual refresher training by the	2	September 2022

	EEO Officer for the EEO Counselors.		
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**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 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 the appeal fifteen (15) days after submission of appeal.

If the review and decision on appeal is not done by the Agency Head.

Provide the name and title of the designee<sup>1</sup> : \_\_\_\_\_

<sup>1</sup> EEO Officer and General Counsel should **NOT** be appointed as agency head designee for review of appeals to reasonable accommodation decisions. Refer to the revised guidelines below. Note the conflict of interest; in the event of an external challenge to the denial of a reasonable accommodation, the agency’s General Counsel would be tasked with defending the agency against a decision in which that office was a decision maker on appeal.  
<http://extranet.dcas.nycnet/eo/diversityeeo/media/19647/reasonable-accommodation-procedural-guidelines-lc-12116.pdf> (p17).



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.

The agency analyzes the reasonable accommodation data and trends.

The agency has posted/will circulate the Reasonable Accommodations at a Glance sheet for the workforce.

Briefly describe procedures and speed of resolution, including the protocol for deciding appeals of Reasonable Accommodation decisions. Does the agency analyze statistics with regard to volume, trends, and speed of disposition of EEO complaints and reasonable accommodation requests and appeals?

None of the Reasonable Accommodations requests for FY 2021 were appealed. There is a protocol in place for appeals, which follows the City's guidelines. The relevant portion of the agency's policy is as follows:

*Appeals to the Executive Director*

An employee may appeal to the Executive Director any supervisory action or failure to act pursuant to this procedure by which the employee believes they are aggrieved. Within 10 business days of receipt of the appeal, the Executive Director, or their designee, shall:

1. Obtain from the agency Disability Rights Coordinator (DRC) and review all documentation relating to the request for reasonable accommodation;
2. Meet with the supervisor and the employee;
3. Consult with the agency DRC and the agency EEO Officer (if different from the DRC);
4. Review the essential job functions, job-related limitations involving the employee's disability, and potential accommodations;
5. Evaluate the reasonableness of employee and supervisor preferences in accommodations, giving primary consideration to the employee's preferences; and
6. Consult with the Mayor's Office for People with Disabilities and with the Department of Personnel. Within 15 business days of receipt of the appeal, the Executive Director shall issue a written determination on the request for reasonable accommodation, specifying what accommodation shall be provided, if any, and directing the supervisor to implement such accommodation promptly. The DRC shall monitor implementation of the reasonable accommodation.



The agency analyzes statistics on volume, trends, and speed of disposition of EEO complaints/inquiries and reasonable accommodation requests and appeals on a quarterly basis. The EEO Officer/DRC tracks all EEO complaints/inquiries and reasonable accommodation requests to ensure they are timely resolved.

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

**A. Executive Order 16: Training on Transgender Diversity and Inclusion**

Under Executive Order No. 16 of 2016, the agency must provide supervisory and front-line staff training approved by DCAS on transgender diversity and inclusion. Pursuant to Executive Order No. 16, this training must be provided to all newly hired supervisory and managerial employees and line staff whose work tasks involve contact with the public.

- The agency plans to train all new employees within 30 days of start date.
- All the managers, supervisors, and front-line employees were re-trained within the last two years.
- 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.

*Additional Comments:* All new employees are expected to complete the sexual harassment prevention, transgender inclusion, conflicts of interest, and Department of Investigations trainings within 30 days of their start date. The CFB decided to require that all staff complete the transgender inclusion training, rather than only managers, supervisors, and front-line employees, as the agency strongly believes that the training is useful to all staff with respect to maintaining an inclusive work environment.

**B. Executive Order 59: Chief Diversity Officer/Chief MWBE Officer**

Under Executive Order No. 59 of 2020, all agencies shall appoint a Chief Diversity Officer/Chief MWBE Officer, with the appropriate experience and knowledge to oversee the agency's MWBE program, to report directly to the agency head. Agency heads shall ensure internal candidates are considered for the Chief Diversity Officer/Chief MWBE Officer.

- The agency appointed a Chief Diversity Officer/ Chief MWBE Officer by August 28, 2020.

Provide the name and title of the Chief MWBE Officer: Kitty Chan, Chief of Staff (Ms. Chan left the agency in August 2021 and the CFB is in the process of hiring a new employee who will take on ACCO and MWBE responsibilities, including being named the agency's Chief Diversity Officer/Chief MWBE Officer – this person will be hired in FY 2022).

*Additional Comments:* N/A

**C. 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 4 – September 1, 2021 – August 31, 2022) as indicated in the Section VII Training above.

*Additional Comments:* All new employees are expected to complete the sexual harassment prevention, transgender inclusion, conflicts of interest, and Department of Investigations trainings within 30 days of their start date. The CFB will continue to comply with the City's annual sexual harassment prevention training requirements.

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

- The agency will input sexual harassment complaint data 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.
- The agency will input **all types of complaint** data 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.
- The agency will ensure that sexual harassment complaints are closed within 90 days.
- The agency will ensure that all other complaints are closed within 90 days.

*Additional Comments: N/A*

**E. Local Law 101 (2018): Climate Survey**

The agency, in collaboration with DCAS, conducted a climate survey in FY 2021 (October 2020) and will proceed to do the following in FY 2022:

- Continue to implement initiatives identified in the 2018 Climate Survey Action Plan which was submitted to DCAS and reported to City Council Speaker in 2020.
- Analyze FY 2021 survey data once provided by DCAS.
- Develop an Action Plan to address concerns raised in the FY 2021 Climate Survey and submit it to DCAS by July 31, 2022. *[Further guidance will be provided to agency by DCAS in 2022.]*

*Additional Comments: N/A*

**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 2022 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 specific to our sexual harassment prevention practices.
- The agency will continue/be required to implement measures 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.**

Amy M. Loprest

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Print Name of Agency Head

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Signature of Agency Head  
April 19, 2022

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Date

**APPENDIX**

Contact Information for Agency EEO Personnel

Please provide contact information (name, title, e-mail, telephone number and full office address) for the following EEO roles at your agency. If several roles are performed by the same individual enter only the name in further entries. Insert table rows as needed.

	<b>Title/Function</b>	<b>Name</b>	<b>Email</b>	<b>Telephone</b>
1.	<b>Agency EEO Officer</b>	Danica You, EEO Officer	<a href="mailto:dyou@nyccfb.info">dyou@nyccfb.info</a>	212-409-1856
2.	<b>Agency Deputy EEO Officer</b>	N/A	N/A	N/A
3.	<b>Agency Chief Diversity and Inclusion Officer</b>	N/A	N/A	N/A
4.	<b>Agency Diversity &amp; Inclusion Officer [if designated]</b>	N/A	N/A	N/A
5.	<b>Chief Diversity Officer/Chief MWBE Officer per E.O. 59</b>	Currently vacant	Currently vacant	Currently vacant
6.	<b>ADA Coordinator</b>	Danica You		
7.	<b>Disability Rights Coordinator</b>	Danica You		
8.	<b>Disability Services Facilitator</b>	Danica You		
9.	<b>55-a Coordinator</b>	N/A	N/A	N/A
10.	<b>Career Counselor(s)</b>	Mychele Gayle, Director of Human Resources	<a href="mailto:MGayle@nyccfb.info">MGayle@nyccfb.info</a>	212-409-1750
11.	<b>Training Liaisons</b>	Danica You (EEO/DEI/Ethics trainings)		
		Mychele Gayle (HR, career development, and other trainings)		
12.	<b>EEO Counselors</b>	Rudy Castro, Director of Records Management	<a href="mailto:RCastro@nyccfb.info">RCastro@nyccfb.info</a>	212-409-1792



		Kyle Kennedy, Independent Expenditures Analyst	<a href="mailto:KKennedy@nyccfb.info">KKennedy@nyccfb.info</a>	212-409-1782
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