



**CITY OF NEW YORK  
CONFLICTS OF INTEREST BOARD**

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

**Fiscal Year 2024**

**Conflicts of Interest Board**

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## I. Commitment and Accountability Statement by the Agency Head

The New York City Conflicts of Interest Board (“COIB”) is committed to providing equal employment opportunity to all individuals and to promoting a workplace that values diversity, equity, and inclusion.

This policy statement affirms COIB’s commitment to maintain a work environment free from all forms of discrimination and harassment prohibited by the City’s Equal Employment Opportunity (“EEO”) Policy, as well as federal, State, and City laws. COIB has issued an EEO Policy to ensure that all employees and applicants are informed of their rights and obligations under these laws as well as the City’s EEO Policy. All COIB staff are responsible for complying with COIB’s EEO Policy and the City’s EEO Policy to prevent unlawful discrimination, including sexual discrimination, in the workplace.

COIB recognizes the value in maintaining a diverse and inclusive workforce and affirms its commitment to promoting a work environment that tolerates and appreciates differences among employees. COIB has issued an annual Diversity, Equity, Inclusion and Equal Employment Opportunity (“DEI-EEO”) Plan and will continue to implement measures and programs to effectuate fair and equitable employment practices for all COIB employees, applicants, clients, customers, consultants, vendors, interns, and contracted employees, in compliance with all relevant federal, State, and City laws.

The City’s EEO Policy is available on the internet and can be accessed at [https://www.nyc.gov/assets/dcas/downloads/pdf/agencies/nyc\\_eeo\\_policy.pdf](https://www.nyc.gov/assets/dcas/downloads/pdf/agencies/nyc_eeo_policy.pdf).

COIB’s EEO Policy is available on the intranet and can be accessed at <http://coibapps2019/coibintranet/docs/coib-eeo-policy.pdf>.

Any employee who wants further information or who requires assistance in identifying and preventing discrimination or harassment should contact COIB’s EEO staff.

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This statement is the same as last year.

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

## II. Recognition and Accomplishments

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

1. COIB has a 100% completion rate for the Sexual Harassment Prevention Training.
2. COIB has a 100% completion rate for the Everybody Matters: EEO and Diversity & Inclusion Training.
3. In connection with heritage months and City holidays, the Agency Head sent emails to all Staff regarding Hispanic Heritage Month, Black History Month, Asian American and Pacific Islander Heritage Month, Pride Month, and Juneteenth explaining the history of the month or holiday and providing information about ways to celebrate throughout the City.
4. COIB created a system to track the application-to-hiring lifecycle for each job vacancy to assess demographic trends and potential structural barriers to hiring and/or promotions.

## III. Workforce Review and Analysis

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

**Total Headcount: 23**

1. Pursuant to Local Law 27 (2023):
  - a. COIB has determined that all employees are being paid in accordance with their respective collective bargaining agreements.
  - b. The EEO Officer checked for occupational segregation by reviewing the most recent workforce composition report to identify job groups with underrepresentation of individuals who identify as a particular gender or race. Please see Section III.3 below for a description of that review and Section IV.A below for the agency's plans to address underrepresentation.
  - c. The EEO Officer checked for pay disparities by analyzing the base salary, managerial levels, years of service, scope of responsibilities, and demographics

of employees who hold the same business and civil service titles. The EEO Officer analyzed the titles of Education and Engagement Specialist/Community Associate (2 employees); Director/Executive Agency Counsel (2 employees); Deputy Director/Executive Agency Counsel (2 employees); Associate Counsel/Agency Attorney (3 employees); and Assistant Counsel/Agency Attorney (2 employees). While no two employees earn the same salary, the difference in salaries is based on years of service, years of prior experience, and the scope of responsibilities in their position or unit. COIB has determined that there are no pay disparities based on gender or race.

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

NYCAPS Employee Self Service (by email; strongly recommended every year)

Agency's intranet site

On-boarding of new employees

Employees unable to complete the self-identification form using ESS will be provided an opportunity to submit paper form to the EEO Office.

In FY 2024, the agency will inform and remind employees of the option to add preferred name in ESS.

3. Review of quarterly CEEDS reports.

Each quarter, the EEO Officer reviews the CEEDS reports received from DCAS' Citywide Equity and Inclusion (CEI) on workforce composition, utilization, new hires, promotions, and separations. Because COIB is a tiny agency, it does not have statistically significant underutilization in any job group. Instead, the EEO Officer reviews the CEEDS report that compares the demographics of the agency's workforce with the demographics of the internal and external labor pools to check for underrepresentation of a particular gender or race in the agency's job groups. For this analysis, underrepresentation means that the number of employees in the agency's job group who identify as a particular gender or race is at least 2 less than what would be expected compared to the internal and external labor pools for that job group. The EEO Officer then analyzes whether any hires, promotions, transfers, or separations have resulted in or eliminated underrepresentation and writes a memorandum summarizing their findings.

Because COIB is a tiny agency, the EEO Officer and Agency Head are always aware of the workforce's demographics and the impact of personnel changes on the workforce's

demographics between quarterly reviews. If a promotion, transfer, or separation results in underrepresentation of a particular gender or race in a specific job group, the EEO Officer and Agency Head know immediately. If the agency is able to hire for the vacated position, the EEO Officer works with Human Resources to ensure that the agency's recruitment sources target a large pool of applicants to increase the diversity of potential candidates and include schools/organizations with a focus on the underrepresented gender or race.

The EEO Officer, Agency Head, Agency Personnel Officer (who also serves as Human Resources Director), and General Counsel hold an annual workforce meeting to discuss demographic trends, potential workplace barriers, and strategies to address those barriers. The EEO Officer works with Human Resources to implement the strategies discussed at the meeting.

- 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.

**Agency Head**

Quarterly  Semi-Annually  Annually  Other \_\_\_\_\_

**Human Resources**

Quarterly  Semi-Annually  Annually  Other \_\_\_\_\_

**General Counsel**

Quarterly  Semi-Annually  Annually  Other \_\_\_\_\_

**Other (EEO Officer)**

Quarterly  Semi-Annually  Annually  Other \_\_\_\_\_

- The agency review entails a discussion concerning perceived workplace barriers for job groups that may surface in underutilization reports and for factors that may be creating these barriers (e.g., hiring patterns in specific job titles).

## **iv. EEO, Diversity, Inclusion, and Equity Initiatives for FY 2024**

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

**❖ Workforce:**

- COIB's goal is to monitor for and address underutilization and underrepresentation of a particular gender or race in its job groups.

❖ **Workplace:**

- COIB's goal is to foster an environment that respects and promotes diversity, equity, and inclusion, and is free from all forms of discrimination and harassment prohibited by the City's EEO Policy.

❖ **Community:**

- COIB's goal is to promote diversity and inclusion in its interactions with the public.

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

- COIB's goal is to provide Staff with information about programs, resources, and activities where Staff can learn more about different demographic groups and participate in events with affinity groups that have similar backgrounds or interests.

## **2. Planned Programs, Initiatives, Actions**

### **A. Workforce**

- Based on the EEO Officer's review of the latest CEEDS reports from DCAS' CEI as of June 30, 2023, the agency has identified an underrepresentation of individuals who self-identify as Black in the Managers job group and an underrepresentation of individuals who self-identify as female in the Paraprofessional job group (see Section III.3 above for a description of the review process).
- When hiring for a Manager position or other position where there is the possibility of promotion to a Manager position, the agency will ensure that the job posting is shared with schools and/or organizations to attract applicants who self-identify as Black. The EEO Officer will review the demographics of applicants to determine whether the agency's recruitment efforts are yielding a sufficiently diverse applicant pool or if additional efforts are needed.
- When hiring for a Paraprofessional position, the agency will ensure that the job posting is shared with schools and/or organizations to attract applicants who self-identify as female. The EEO Officer will review the demographics of applicants to determine whether the agency's recruitment efforts are yielding a sufficiently diverse applicant pool or if additional efforts are needed.
- COIB plans to create an exit interview with a standard set of questions and will conduct exit interviews with all separating employees to gather information about why the

employee is leaving. The EEO Officer will review this information and the demographics of separating employees for any potential patterns.

- The EEO Officer, Agency Head, Agency Personnel Officer/Human Resources Director, and General Counsel meet annually to discuss workforce composition, demographic trends to be considered when making decisions about recruitment, hiring, promotions, and attrition, and potential workplace barriers that may contribute to underrepresentation.
- To help develop and retain employees, COIB has a Non-Managerial Staff Incentive Program to recognize and reward Staff who perform above and beyond.

## **B. Workplace**

In FY 2024, the agency will:

- Promote employee involvement by supporting Employee Resource Groups (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

Additionally:

- The EEO Officer will continue to annually distribute the agency's EEO Policy Statement and EEO Policy, which includes the City's EEO Policy Handbook, to all employees by email. COIB's EEO Policy is also posted on COIB's intranet and on a bulletin board in the office kitchen.
- The EEO Officer will continue to annually distribute the DCAS EEO Complaint Procedural Guidelines, EEO Complaint Process At a Glance, and Reasonable Accommodations Procedural Guidelines to all employees by email.



- COIB will continue to utilize a social committee, which includes an employee from each work unit, that periodically organizes agencywide events where all employees have a chance to interact with one another.
- COIB plans to create an exit interview with a standard set of questions and will conduct exit interviews with all separating employees to gather information about the workplace environment.
- The Agency Head sends emails to all employees in connection with heritage months and City holidays to educate employees about the history of the month or holiday and provide information about ways to celebrate and resources to learn more.
- Because COIB is a tiny agency, there are limited resources and limited staff for Employee Resource Groups, a Diversity Council, and/or diversity programming within the agency. The EEO Officer and Human Resources Director will continue their efforts to work with other City agencies to identify programming aimed at enhancing equity and race relations and to discuss the possibility of including COIB employees in that programming. The EEO Officer and Human Resources Director will also continue to work on identifying programming that is available to all City employees, such as those offered by WorkWell NYC, with the goal of promoting those programs to COIB employees.

## C. Community

In FY 2024, the agency will:

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

Additionally:

- To the extent feasible, COIB will continue to utilize a minority-owned business to provide services at the workplace.
- The EEO Officer will work with the Education & Engagement Unit, which is responsible for COIB's website and social media posts, to ensure that the agency is creating accessible digital content and including diverse representation in the graphics on its website.

## V. Recruitment

### A. Recruitment Efforts

The EEO Officer and Human Resources have drafted a general recruitment plan to ensure that job postings for open positions are shared with the expanded list of recruitment sources that were identified based on the agency's past research and outreach. As the agency identifies new potential recruitment sources, they will be added to the plan.

When there is an open position in a job group with underrepresentation, the EEO Officer will work with Human Resources to ensure that the agency's recruitment sources target a large pool of applicants to increase the diversity of potential candidates and include schools and/or organizations to attract applicants of an underrepresented gender or race. The EEO Officer will review the demographics of applicants to assess whether COIB's recruitment sources are yielding sufficiently large and diverse applicant pools. Based on the results of that review, the EEO Officer may suggest expanding the agency's recruitment sources to target members of an underrepresented gender or race for a specific position.

The EEO Officer has completed the Structured Interview & Unconscious Bias training and utilizes the key principles from that training to assist hiring managers in developing an interview process that is tailored to the staffing needs of the agency. With guidance from the EEO Officer, the hiring manager develops a standard set of interview questions for each open position to be used during first-round interviews. COIB's standard set of interview questions includes a question about how candidates learned of the position so that the EEO Officer may better assess whether its various recruitment sources are yielding sufficiently large and diverse applicant pools.

### B. Recruitment for Civil Service Exams

List any planned recruitment events for FY 2024 that will be held by the agency to promote open-competitive civil service examinations.

<b>Event Date</b>	<b>Event Name</b>	<b>Borough</b>
None	N/A	N/A

List planned expenditures for FY 2024 related to recruiting candidates for open-competitive and promotion civil service exams.

<b>Borough</b>	<b>Approximate Dollar Amount (\$)</b>
Bronx	\$0
Brooklyn	\$0
Manhattan	\$0
Queens	\$0
Staten Island	\$0

COIB Comment: COIB is a tiny agency with very few competitive civil service positions; it does not currently have any open competitive civil service positions.

### **C. Recruitment Sources**

1. Job boards such as Indeed, the Public Service Jobs Directory, the Network of Bar Leaders, and the New York State Job Bank. The agency works to reach a larger pool of applicants to increase the diversity of potential candidates. These sources have resulted in previous hires.
2. College and law schools, including historically black colleges and universities (“HBCUs”). The agency works to reach a larger pool of applicants to increase the diversity of potential candidates and added HCBUs to its list of schools to reach more minority group members. These sources have resulted in previous hires.
3. Regional bar associations, such as the New York City Bar Association, as well as affinity bar associations, such as the Metropolitan Black Bar Association, National Native American Bar Association, New Jersey Muslim Lawyers Association, and New Jersey Women Lawyers Association. The agency works to reach a larger pool of applicants as well as minority group members to increase the diversity of its potential candidates. These sources have not resulted in previous hires.
4. Emails to contacts in City government, including emails to minority group members, to Agency Personnel Officers at other agencies, and to the DCAS Office of Citywide Recruitment (OCR), to inform them of job openings and encourage them to share job postings with potential candidates. The agency works to reach a larger pool of applicants as well as minority group members to increase the diversity of its potential candidates. This source has resulted in previous hires.
5. Social media such as Twitter and LinkedIn. The agency works to reach a larger pool of applicants to increase the diversity of potential candidates. These sources have not resulted in previous hires.

6. The Mayor’s Office for People with Disabilities and ACCES VR. The agency works to reach a larger pool of applicants, including those with disabilities, to increase the diversity of its potential candidates. These sources have not resulted in previous hires.

## D. Internships/Fellowships

The agency provided the following internship opportunities in FY 2024:

Type of Internship\Fellowship	Total	Race/Ethnicity *[#s] * Use self-ID data	Gender * [#s] * Use self-ID data
1. Urban Fellows			M __ F__ Non-Binary __ Other __ Unknown __
2. Public Service Corps			M __ F__ Non-Binary __ Other __ Unknown __
3. Summer College Interns			M __ F__ Non-Binary __ Other __ Unknown __
4. Summer Graduate Interns			M __ F__ Non-Binary __ Other __ Unknown __
5. Other (specify):			M __ F__ Non-Binary __ Other __ Unknown __

COIB Comment: COIB is a tiny agency and does not currently offer internship or fellowship opportunities because it lacks the staff to supervise the work of an intern or fellow.

## 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 no 55-a participants.
- There are 0 participants who have been in the program less than 2 years.
- In the last fiscal year, a total of 0 new applications for the program were received.

- 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.

COIB Comment: COIB is a tiny agency with very few competitive civil service positions and many agency-specific titles. There has not been an open competitive civil service position at the agency for many years. If a competitive civil service position becomes available, COIB will ensure that the job posting includes the suggested 55-a Program language and will share the job posting with the Citywide 55-a Coordinator for wider distribution.

## VI. Selection (Hiring and Promotion)

### A. Career Counselors

The Career Counselor circulates information to all employees about civil service examinations and job vacancies at other City agencies. The Career Counselor encourages Staff to take promotional civil service examinations where appropriate and is available to assist Staff with job applications. Because COIB is a tiny agency, employees know almost immediately when there is an opportunity for promotion at the agency.

### B. New Hires and Promotions

Because COIB is a tiny agency, the procedures for selections and promotions are reviewed by the Agency Head, Agency Personnel Officer/Human Resources Director, EEO Officer, and General Counsel each time there is a job vacancy. While promotions are limited, COIB's managers assign a broad range of work and provide regular, specific feedback to help employees develop the skills necessary to be eligible for a promotion when a position becomes available. In addition, COIB employees frequently work collaboratively between units, giving them the opportunity to consider open positions in other units.

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

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

- Ensure that all vacancy announcements include the revised NYC EEO I Anti-Discrimination Statement.
- Review vacancy postings to ensure elimination of language that has the potential for gender and age stereotyping and other unlawful discrimination. (It is recommended to use gender-neutral terms and pronouns and language that is age-inclusive).

- Actively monitor agency job postings and ensure recruitment strategy aligns with the diversity goals of the agency.
- Provide consultation regarding creation/review of objective criteria for evaluating candidates for hire or promotion and applying those criteria consistently to all candidates.
- In collaboration with the Director of Human Resources, review interview questions to ensure that they are EEO-compliant, job-related, and required by business necessity.
- Assist the hiring manager if a reasonable accommodation is requested during the interview.
- Observe interviews, when necessary, especially for underutilized job titles and/or mid- and high-level discretionary positions.
- Advise Human Resources to use candidate evaluation form for uniform assessment and equity.
- Periodically review candidate evaluation forms and conduct a job applicant analysis via the NYCAPS eHire Applicant Interview Log reports to advise Human Resources of any demographic trends and/or EEO concerns based on available self-ID data.
- Review hiring package to evaluate that the selection process was conducted in accordance with EEO best practices.
- Other: COIB hiring managers keep an internal Applicant Interview Log for each job vacancy to track recruitment sources and the outcome of the hiring process so that the EEO Officer can use this information to assess recruitment sources. Additionally, the EEO Officer will track the application-to-hiring lifecycle for each job vacancy and use the NYCAPS Applicant Demographic report to assess the demographics of all applicants compared to the demographics of those selected for interviews, hiring, and promotions. The EEO Officer will review this information ahead of the agency's annual workforce meeting for demographic trends and potential structural barriers to hiring and/or promotions.

#### **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?

- The agency will use the DCAS Layoff Procedure as guidance, should there be any layoffs, terminations, and demotions due to legitimate business/operational reasons in FY 2024.

- ☒ The agency will analyze the impact of layoffs or terminations on racial, gender, age groups, and people with disabilities.
- ☒ Where layoffs or terminations would have a disproportionate impact on any of these groups, the agency will document that the targeted titles or programs were selected based on objective criteria and justified by business necessity.
- ☒ The Agency Personnel Officer, EEO Officer and General Counsel will be involved in making layoff or termination decisions. It should be noted that layoffs must be conducted by seniority in compliance with civil service law (for competitive titles) and union contract (for non-competitive and labor class titles).

## VII. Training

<b>Training Topic</b>	<b>Type of Audience (e.g., All Staff, Front-line Employees, Managers, Supervisors, etc.)</b>	<b>Goal Number of Participants</b>	<b>Projected Dates</b>
1. Everybody Matters: EEO and Diversity & Inclusion Training for NYC Employees (e-learning)	All employees – Biennially (Cycle 2 must be completed by March 31, 2025.)	23	December 2024
2. Everybody Matters: EEO and Diversity & Inclusion Training for NYC Employees (classroom/live webinar)	All employees – Biennially (Cycle 2 must be completed by March 31, 2025.)	n/a (all e-learning)	
3. Sexual Harassment Prevention (e-learning)	All employees – Annually (Cycle 6 runs between September 1, 2023 – August 31, 2024)	23	May 2024
4. Sexual Harassment Prevention (classroom/live webinar)	All employees – Annually (Cycle 6 runs between September 1, 2023 – August 31, 2024)	n/a (all e-learning)	
5. IgbTq – Power of Inclusion (e-learning)	Managers, Supervisors, and Front-line employees (must be completed by March 31, 2024)  All other employees	23	January 2024

6. IgbTq – Power of Inclusion (classroom/live webinar)	Managers, Supervisors, and Front-line employees (must be completed by March 31, 2024)  All other employees	n/a (all e-learning)	
7. Disability Awareness and Etiquette			
8. Structured Interviewing and Unconscious Bias (classroom/live webinar)			
9. Other (specify)			
10. Other (specify)			

**VIII. Reasonable Accommodation**

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

The Board maintains an Excel spreadsheet to track reasonable accommodation requests and appeals. A summary of the Board’s reasonable accommodation procedures is as follows:

- (1) A person may make a request for a reasonable accommodation orally or in writing to the EEO Officer. Individuals are encouraged to make a request in writing by submitting a Reasonable Accommodation Request Form to the EEO Officer. Supervisors/managers who are notified or aware of a need for a reasonable accommodation, must inform the EEO Officer and refer the individual to the EEO Officer within three calendar days of becoming aware.
- (2) Within 10 business days of receiving a request for a reasonable accommodation or observing that an individual may require an accommodation, the EEO Officer will begin a cooperative dialogue with the requestor.
- (3) Within 30 calendar days of beginning a cooperative dialogue, or as soon as reasonably possible after all supporting information/documentation requested by the EEO Officer has been provided by the requestor, the EEO Officer will grant or deny the request and communicate the decision to the requestor in writing.
- (4) A requestor may appeal the denial of an accommodation to the Executive Director within 30 calendar days of receiving the decision.



(5) Within 15 business days of receipt of the appeal, the Executive Director will issue a written determination on the appeal.

- Managers, supervisors, human resources personnel and discipline personnel are required to report to the EEO Office any reasonable accommodation requests and needs that are received, observed, learned about, or suspected, so that the EEO Office may facilitate discussions, research appropriate accommodations, and assist with the resolution of the matter.
- Absent of any undue hardship, the agency provides reasonable accommodation for disability, religion, victims of domestic violence, sex offense and stalking, pregnancy, childbirth, or a related medical condition.
- The agency follows the City's Reasonable Accommodation Procedure.
- The agency grants or denies request 30 days after submission or as soon as possible.
- The Agency Head or designee must review and grant or deny an appeal fifteen (15) days after submission of appeal.
- If the review and decision on appeal is not done by the Agency Head.  
Provide the name and title of the designee<sup>1</sup> : \_\_\_\_\_
- The designee reports directly to the Agency Head.
- The agency will input the Reasonable Accommodation activity on the DCAS Citywide Complaint and Reasonable Accommodation (CAD) Database and update the information as needed.

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

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

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<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.

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

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

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

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

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

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

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

During FY 2023, the agency provided the following workplace accommodations:

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

Grooming/Attire

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

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

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

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

The agency plans to train all new employees within 30 days of start date.

All managers, supervisors, and front-line employees will be re-trained every two years, no later than the third quarter of the Fiscal Year, as indicated in Section VII Training above.

In addition, all other employees will be trained or re-trained every two years, as indicated in Section VII Training above.

The agency will ensure that the Transgender Restroom Access notice/poster is posted where required, e.g., on bulletin boards, near restrooms and, in digital form, where other EEO notices and announcements can be found.

## **X. Audits and Corrective Measures**

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 \_\_\_\_\_ 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 \_\_\_\_\_.
- Within the last two years the agency was involved in an audit conducted by the EEPC or \_\_\_\_\_ specific to our EEO practices.
- The agency will continue/be required to implement corrective actions during the year that this plan is in effect.
- The agency received a Certificate of Compliance from the auditing agency.



## Appendix A: Contact Information for Agency EEO Personnel

**Agency EEO Office mailing address:**

2 Lafayette Street, Suite 1010  
New York, New York 10007

	<b>Title/Function</b>	<b>Name</b>	<b>Email</b>	<b>Telephone</b>
1.	<b>Agency EEO Officer</b>	Katherine J. Miller	<a href="mailto:kmiller@coib.nyc.gov">kmiller@coib.nyc.gov</a>	(212) 437-0730
2.	<b>Agency Deputy EEO Officer</b>	n/a		
3.	<b>Agency (Chief) Diversity &amp; Inclusion Officer</b>	n/a		
4.	<b>Chief Diversity Officer/Chief MWBE Officer per E.O. 59</b>	Tasnia Karim	<a href="mailto:karim@coib.nyc.gov">karim@coib.nyc.gov</a>	(212) 437-0750
5.	<b>ADA Coordinator</b>	Katherine J. Miller	See above	See above
6.	<b>Disability Rights Coordinator</b>	Katherine J. Miller	See above	See above
7.	<b>Disability Services Facilitator</b>	Tasnia Karim	See above	See above
8.	<b>55-a Coordinator</b>	Tasnia Karim	See above	See above
9.	<b>EEO Investigator(s)</b>	Katherine J. Miller	See above	See above
10.	<b>Career Counselor(s)</b>	Tasnia Karim	See above	See above
11.	<b>EEO Training Liaison(s)</b>	Katherine J. Miller	See above	See above
12.	<b>EEO Counselor(s)</b>	Alex Kipp Clare Wiseman	<a href="mailto:kipp@coib.nyc.gov">kipp@coib.nyc.gov</a> <a href="mailto:wiseman@coib.nyc.gov">wiseman@coib.nyc.gov</a>	(212) 437-0770 (212) 437-0724

## Appendix B: Local Law 28 (2023) – Diverse Recruitment and Retention

**Agency Name: Conflicts of Interest Board**

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

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

For each agency-specific training program your agency has that is required for, or relevant to, an applicant’s appointment to a position based on an open-competitive civil service examination or a promotion civil service examination, list the following.

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

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

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

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

Event Date	Event Name	Borough
None		

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

Comments: COIB is a tiny agency (23 employees) with very few competitive civil service positions; it did not have any open competitive civil service positions during FY 2023. Accordingly, COIB did not recruit for or hold training programs related to open-competitive civil service examinations or promotion civil service examinations during FY 2023.