

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

## **Fiscal Year 2024**

### **NEW YORK CITY BUSINESS INTEGRITY COMMISSION**

**DIVERSITY AND EQUAL EMPLOYMENT OPPORTUNITY PLAN  
FISCAL YEAR 2024**



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

On behalf of the New York City Business Integrity Commission, I hereby declare my commitment as the Agency Head to support and enforce the rights and protections afforded by the New York City EEO Policy, the City and State Human Rights Law, and all other relevant laws, for all employees, applicants for employment, external contractors, consultants, and agency partners, and members of the public served by our Agency.

I will strive to achieve the greatest possible diversity among our workforce, to create an inclusive culture of openness, tolerance, 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 involve my entire leadership team in our efforts to enhance and promote the values of equity, inclusion, and respect for all. All executives, managers and supervisors in our agency 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.

I will hold the top leadership of our agency, as well as the EEO Officer, all EEO professionals, human resources professionals, legal professionals, managers, and supervisors accountable for ensuring that the agency does not discriminate against employees or applicants for employment. We shall support the diversity, equity, and inclusion initiatives at the agency by observing EEO mandates and working with dedication to attain agency goals in this area. All agency staff must be compliant with the City's EEO Policy and the implementation of this Diversity and EEO Plan.

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.

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 and Chief Diversity Officer Johnnie Davis will serve as the primary resource for managers and supervisors by providing best practices and direction in addressing EEO issues. His contact information will be prominently available to all employees.

During this Fiscal Year 2024, I will announce this Commitment Statement to our employees, to affirm the principles of diversity, inclusion, and equal employment opportunity, and to communicate our dedication to equity and all values that drive us toward this goal.

☒ 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 Equal Employment Opportunity, Equity, Diversity, and Inclusion:

1. Staff attended Sexual Harassment Prevention training, Inclusive Workplace Strategies for People with Disabilities, and LGBTQ: The Power of Inclusion. In addition, supervisors attended Structured Interviewing, and Everybody Matters training.
2. Our Chief Diversity Officer sent emails to staff promoting Diversity and informing staff of events that recognized diversity and inclusion.
3. Human Resources posted and sent staff via email EAP Newsletters discussing diversity and inclusion.
4. The EEO Officer sent email reminders to staff about BIC's commitment to EEO and resources for staff. BIC's commitment letter was posted on BIC's EEO Intranet page and sent to staff via email.

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: Agency Email blasts

### III. Workforce Review and Analysis

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

Total Headcount: 73

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

1. [Look at titles where pay disparity exists and salaries vary within the same title when compared by years of service. Also conduct a comparison of women and racial or ethnic minority group members.]
2. [Describe steps taken to encourage all employees at your agency to update self-ID information regarding race/ethnicity, gender, and veteran status through either NYCAPS Employee Self Service (ESS) or other means.]

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

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

3. [Describe the review process of the quarterly CEEDS reports on workforce composition, utilization, and new hires and promotions data presented in your quarterly agency workforce dashboard and/or internal workforce reporting. Describe how your agency's

EEO Officer, Personnel Officer and Agency Head work together to review demographic trends. These reports must be reviewed regularly with the Agency Head.]

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

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

**Agency Head**

☒ Quarterly ☐ Semi-Annually ☐ Annually ☐ Other \_\_\_\_\_

**Human Resources**

☒ Quarterly ☐ Semi-Annually ☐ Annually ☐ Other \_\_\_\_\_

**General Counsel**

☐ Quarterly ☐ Semi-Annually ☐ Annually ☒ Other \_\_\_\_\_

**Other (\_\_\_specify)**

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

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

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

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

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

#### **Workforce:**

- BIC will continue to analyze existing recruitment policies with the goal of encouraging a diverse applicant pool and determining how additional resources, such as technology, can be used to achieve this goal.
- As a smaller agency, BIC constantly engages in multi-functional positions and inter-unit cross training of employees.
- In FY24, BIC will remind and encourage its employees to update self-ID information regarding race/ethnicity, gender, and veteran status through the agency's intranet site. The reminder to self-ID is also published within NYCAPS ESS as applicants submit their applications for prospective employment.

#### **Workplace:**

- BIC continues to require managers and personnel who engage in interviews for vacant positions or other employment related interviews (e.g., interns), to attend structured interviewing training, which includes training recognizing all types of biases, including unconscious bias. BIC is proud to say, that by the beginning of FY2024, all managers and supervisors attended diversity training, including unconscious bias and Everybody Matters.
- Moreover, BIC continues to send out regular training notifications of the Citywide Training Center (CTC) to support the professional development of employees.
- BIC also shares monthly lists of exams being administered by DCAS, resources and articles on diversity and inclusion, as well as EEO-related matters with HR and staff via email.
- In FY2024, the agency will continue to conduct the citywide exit survey and citywide onboarding survey to improve the recruitment, hiring, inclusion, retention, and advancement of people in underrepresented groups.

#### **Community:**

- Human Resources will continue to ensure that the agency's services are provided to the community in a manner that is accessible to all, regardless of ethnicity, gender, culture, disability, age, religion, or sexual orientation.
- In accordance with Executive Order 120, as well as Intros 673-A, 683-A, 881-A and 883-A signed into law by Mayor de Blasio in March 2016, BIC offers translation services in several different languages. Moreover, BIC's website is hosted by the Department of Information Technology and Telecommunications (DoITT), and they are responsible to ensure that the web platform for which BIC's site resides adheres to legislation mandating website translation. BIC continues to expand its available services to include online services which integrate language translation to better serve members of the public who do not speak English.

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

- BIC has actively engaged minority equity partners to help us achieve equity and positive race relations in FY 23, and it will utilize the latter part of FY 2024 towards the planning, development, and implementation of such initiatives.

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

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

### **A. Workforce**

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

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

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

In FY 2024 the Agency will address underutilization 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:
- Encourage agency employees to take promotional civil service examinations.

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

- 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.

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

The agency will address underutilization in FY 2024 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:
- Encourage agency employees to take promotional civil service examinations.

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

- 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:*

In the past, BIC has reviewed and ultimately raised salaries of employees within similar titles where HR and management identified a wage gap or difference. This ensure that similar-placed employees doing the same work, were paid equally.

## B. Workplace

[Describe specific actions designed to create inclusive workplace culture, enhance equity, and initiatives undertaken to address race relations in the agency. (e.g., modeling inclusive language such as preferred pronouns and age-inclusive language on job postings, celebrating heritage months, ensuring worksite and meetings are accessible, creating agency specific surveys or implementing initiatives based on previous agency specific surveys, etc.).]

[Select the options that apply to your agency.]

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

List below the names of existing ERGs:

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

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

☐ Agency Diversity Council is in existence and active

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

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

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

## C. Community

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

Over the past five years, the Commissioner has met with employees of BIC licensees and registered companies to discuss, among other items, the workplace environment, offer assistance with disparate or perceived disparate treatment, and suggest resources for both company owners and employees.

Furthermore, the Chief Diversity Officer set up an internal folder of all M/WBE companies who reach out to BIC to utilize when making purchases. She also attended a virtual job fair and reviewed all BIC active procurement and made recommendations to BIC's procurement officer to change vendors to M/WBE companies when possible.

In FY 2024, the agency will:

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

## V. Recruitment

### A. Recruitment Efforts

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

The Agency will implement the following recruitment strategies and initiatives in FY 2024:

- 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.
- 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 our 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

## B. Recruitment for Civil Service Exams

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

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

Event Date	Event Name	Borough

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

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

## C. Recruitment Sources

[List diverse recruitment sources, the target population your agency hopes to reach through these resources and whether the use of these sources resulted in previous hires. Recruitment sources should reflect your agency's effort to reduce underutilization in specific job groups and to otherwise diversity your workforce.]

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

## D. Internships/Fellowships

[Indicate the type of internship/fellowship opportunities available at your agency. Please provide the number of student interns/fellows employed in FY 2023 and their demographic profiles, based on self-ID data. Indicate your plans to provide internship/fellowship opportunities in FY 2024. What are the sources you plan to draw upon in recruiting and hiring interns? Are you providing opportunities for interns to advance to entry-level positions in your agency? Did the agency hire interns in the past? Explain the reason if your agency does not offer internship /fellowship opportunities.]

The agency provided the following internship opportunities in FY 2023:

Type of Internship\Fellowship	Total	Race/Ethnicity *[#s] * Use self-ID data	Gender * [#s] * Use self-ID data
1. Urban Fellows	0		M __ F__ Non-Binary __ Other __ Unknown __
2. Public Service Corps	0		M __ F__ Non-Binary __ Other __ Unknown __
3. Summer College Interns	9	5 Asian 4White	M _4_ F__5 Non-Binary __ Other __ Unknown __
4. Summer Graduate Interns	0		M __ F__ Non-Binary __ Other __ Unknown __
5. Other (specify):			M __ F__ Non-Binary __ Other __ Unknown __

## E. 55-a Program

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

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

[Describe your agency's plans to utilize the 55-a Program to hire and retain qualified individuals with disabilities. This should include the goals for the Program, strategies your agency will use to educate hiring managers and those involved in the recruitment process, any challenges your agency has or foresee in recruiting and hiring 55-a candidates. If your agency hires for competitive titles and does not use the program, please explain why.]

- ☐ Agency uses mostly non-competitive titles which are not eligible for the 55-a Program.
- ☐ Agency does not use the 55-a Program and has no participating employees.

## VI. Selection (Hiring and Promotion)

[Note: This section must be prepared in consultation with the Agency Personnel Officer.]

### A. Career Counselors

In FY 2024, 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 agency staff with citywide vacancy announcements, civil service exams notices and other career development information.

## **B. New Hires and Promotions**

[Describe planned actions to review and assess the current new hire and promotional procedures for selection, especially for mid- and high-level discretionary positions. Actions may include monitoring the representativeness and fairness of the selection and appointment process, vacancy posting protocols, training of hiring managers, procedures for interviewing applicants, the role of the EEO Officer in the selection and promotion actions, the use of the NYCAPS Applicant Interview Log Report, and efforts to identify and eliminate structural barriers to employment.]

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

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

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: \_\_\_\_\_

#### **D. Layoffs**

During periods of layoffs, terminations, and demotions due to legitimate business/operational reasons, what is your protocol for analyzing the impact of such actions based upon gender, race, and age? *[It is most useful to conduct this analysis prior to finalizing the list of titles that will be impacted. Ensure that the Agency General Counsel and the Law Department are involved in the review.]*

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



## VII. Training

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

Training Topic	Type of Audience (e.g., All Staff, Front-line Employees, Managers, Supervisors, etc.)	Goal Number of Participants	Projected Dates
1. Everybody Matters: EEO and Diversity & Inclusion Training for NYC Employees (e-learning)	All employees – Biennially (Cycle 2 must be completed by March 31, 2025.)	73	March 31, 2025
2. Everybody Matters: EEO and Diversity & Inclusion Training for NYC Employees (classroom/live webinar)	All employees – Biennially (Cycle 2 must be completed by March 31, 2025.)	73	March 31, 2025
3. Sexual Harassment Prevention (e-learning)	All employees – Annually (Cycle 6 runs between September 1, 2023 – August 31, 2024)	73	August 31, 2024
4. Sexual Harassment Prevention (classroom/live webinar)	All employees – Annually (Cycle 6 runs between September 1, 2023 – August 31, 2024)	73	August 31, 2024
5. IgbTq – Power of Inclusion (e-learning)	Managers, Supervisors, and Front-line employees (must be completed by March 31, 2024)  All other employees	73	August 31, 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	73	March 31, 2024
7. Disability Awareness and Etiquette		73	August 31, 2024
8. Structured Interviewing and Unconscious Bias (classroom/live webinar)	Hiring Managers		ASAP
9. Other (specify)			
10. Other (specify)			

## VIII. Reasonable Accommodation

[Please indicate the actions your agency will take to ensure that the process of reviewing reasonable accommodation requests is compliant with the EEO Policy as well as the applicable federal, state, and local laws. Additionally, please detail any best practices currently implemented in this area. Lastly, please describe your current appeal protocol.]

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:

- ☒ 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.

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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.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## X. Audits and Corrective Measures

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

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

## 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.]

Elizabeth Cota  
Print Name of Agency Head

[Signature]  
Signature of Agency Head

8/6/25  
Date

## Appendix A: Contact Information for Agency EEO Personnel

### Agency EEO Office mailing address:

[Please provide contact information (name, title, e-mail, telephone number and **full office address** if different from the main address above, for the following EEO roles at your agency. If several roles are performed by the same individual enter only the name in further entries. Insert additional rows as needed.]

	Title/Function	Name	Email	Telephone
1.	Agency EEO Officer	Johnnie Davis	Jdavis2@bic.nyc.gov	212-437-0542
2.	Agency Deputy EEO Officer			
3.	Agency (Chief) Diversity & Inclusion Officer [if appointed]			
4.	Chief Diversity Officer/Chief MWBE Officer per E.O. 59	Johnnie Davis	Jdavis2@bic.nyc.gov	212-437-0542
5.	ADA Coordinator	Johnnie Davis	Jdavis2@bic.nyc.gov	212-437-0542
6.	Disability Rights Coordinator	Johnnie Davis	Jdavis2@bic.nyc.gov	212-437-0542
7.	Disability Services Facilitator	Johnnie Davis	Jdavis2@bic.nyc.gov	212-437-0542
8.	55-a Coordinator	Johnnie Davis	Jdavis2@bic.nyc.gov	212-437-0542
9.	EEO Investigator(s)	Johnnie Davis	Jdavis2@bic.nyc.gov	212-437-0542
10.	Career Counselor(s)	Cynthia Haskin	chaskins@bic.nyc.gov	212-437-0575
11.	EEO Training Liaison(s)			
12.	EEO Counselor(s)	Tisha Magsino	tmagsino@bic.nyc.gov	212-437-0519
13.	Other (specify)			



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

**Agency Name:**

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

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

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

[Insert name of the Training Program]	Totals
# of applicants enrolled in such program	N/A
# 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 base on graduation from the program	

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

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



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

Event Date	Event Name	Borough
	N/A	

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