



ALAINA GILLIGO
FIRST DEPUTY COMPTROLLER

CITY OF NEW YORK
OFFICE OF THE COMPTROLLER
SCOTT M. STRINGER

EXECUTIVE OFFICE

OFFICE OF THE NEW YORK CITY COMPTROLLER
DIVERSITY AND EQUAL EMPLOYMENT OPPORTUNITY PLAN
FISCAL YEAR 2020

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

The Comptroller’s Office is committed to maintaining a workplace that preserves fair employment practices and reflects the community in which we work and live. The Comptroller’s policy of holding all employees—at every level of seniority—accountable for keeping our workplace free from discrimination and harassment is central to ensuring that we provide equal employment opportunities for everyone in our workforce, and for those seeking to join our team; no matter what. The Agency’s EEO Policy and Annual Plan is a reflection of the Comptroller’s commitment to always strive to do what is right.

The Comptroller’s Office is an equal opportunity employer that will not tolerate discrimination or harassment of any kind against employees and/or applicants for employment on the basis of actual or perceived age, race, color, national origin, immigration status, religion/creed, gender (including gender identity or expression), disability, pregnancy, status as a current or former military service member, arrest or conviction record, marital or partnership status, caregiver status, genetic information or predisposing genetic characteristic, sexual orientation, unemployment status, consumer credit history, salary history, status as a victim/survivor of domestic violence, sex offenses, or stalking, or other non-merit based factors (collectively “protected status”). This Policy serves to reinforce this commitment.

Another Comptroller’s Office policy ensures that no employees or job applicants will suffer retaliation or harassment for raising good faith complaints of discrimination; opposing discrimination; participating (in any way) in an employment discrimination investigation or lawsuit; or engaging in any other protected activity.

Consistent with local, state, and federal laws governing reasonable accommodations, the Comptroller’s Office will endeavor to accommodate specific needs to allow employees and applicants to apply for a job, perform the duties of a job, or enjoy equal benefits and privileges of employment that are enjoyed by similarly situated employees.

Any employee or applicant who believes they have been subject to discrimination, retaliation, or harassment should contact the Office's Equal Employment Opportunity ("EEO") Officer or the Office of the General Counsel. The Comptroller's Office will provide a prompt, thorough, and impartial investigation into any report of an alleged violation of this Policy. Immediate and proportionate corrective action will be taken if it is determined that discrimination has occurred.

This statement is the same as last year.

II. Recognition and Accomplishments

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

1. See Office of Diversity initiatives in **section IV, pages 8-10.**
2. See Special Events initiatives in **section IV, page 11.**
3. See Training initiatives in **section VII, pages 25-26.**
- 4.

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

- Diversity & EEO Awards*
- Diversity and EEO Appreciation Events*
- Public Notices
- Positive Comments in Performance Appraisals
- Other: **The Tasks and Standards section of the Agency's "Performance Evaluation and Development Plan" for supervisors requires commitment to the Agency's EEO Policy & Procedures, as well as awareness of rules and procedures as stated in the Employee Manual, including ethical standards and codes of conduct.**

**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 2020.

Additional Comments:

For 2019 initiatives and 2020 plans:

See Office of Diversity initiatives in section IV, pages 8-10.

See Special Events initiatives in section IV, page 11.

See Training initiatives in section VII, pages 25-26.

III. Workforce Review and Analysis

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 2020, 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 ESS (by email annually)

Agency's intranet site

Newsletters

On-boarding

Manager/supervisor observation, if employee refuses to self-ID

Additional Comments: The Comptroller's Office sends annual email reminders to encourage employees to update self-ID information on the Agency's intranet and via NYCAPS.

2. Describe the review process of the CEEDS workforce composition, utilization, 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 General Counsel work together to review demographic trends.

These reports must be reviewed regularly with the Agency Head. See “Additional Comments” section below.

The agency conducts regular reviews of the 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
Human Resources	<input checked="" type="checkbox"/> Quarterly <input type="checkbox"/> Semi-Annually <input type="checkbox"/> Annually <input type="checkbox"/> Other
General Counsel	<input type="checkbox"/> Quarterly <input type="checkbox"/> Semi-Annually <input type="checkbox"/> Annually <input checked="" type="checkbox"/> Other as necessary
Agency Head	<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: The EEO Officer receives a quarterly workforce report provided by the director of Workforce Data Analytics in NYC DCAS Human Capital. The Comptroller’s Office (EEO, Human Resources and Administration) uses this report, along with the quarterly CEEDS workforce composition summary and the Agency’s bureau organizational charts to create gender and ethnicity breakdown charts that allow us to assess the demographic balance of each bureau in order to review data and explore the need for other recruitment outreach or retention efforts.

IV. EEO, Diversity, Inclusion, and Equity Initiatives for FY 2020

1. Proactive Strategies to Enhance Diversity, EEO and Inclusion

State below the central goals of your strategy for FY 2020 focused on enhancing diversity, equal employment opportunity, and the overall value of inclusion at your

agency. Include initiatives that your agency will implement in FY 2020. See “Goals” comment below.

1. Workforce:

- Development of an active plan to adjust any imbalances in the Agency’s demographic composition
- Heightened Agency presence at job fairs, colleges, masters programs, etc., in an effort to attract more diverse applicants.

2. Workplace:

- Meeting with the Agency’s Deputy Comptrollers to heighten their awareness of the need for balance in their bureau workforce ethnicity composition and the need for greater diversity during the interview stage

3. Community:

- The Office of Diversity Initiatives is responsible for implementing and monitoring a letter-grading program that holds City agencies accountable to comply with Local Law 1 of 2013 and advocating for additional measures to increase the City’s utilization of minority and women-owned business enterprises (M/WBEs).
- The Office of Diversity Initiatives also assists the Corporate Governance team on supplier, workplace and board diversity initiatives. In October 2019, the Comptroller’s Office launched the Boardroom Accountability Project 3.0, a new first-in-the-nation initiative calling on companies to adopt a policy requiring the consideration of both women and people of color for every open board seat and for CEO appointments, a version of the “Rooney Rule” pioneered by the National Football League (NFL).
- In addition, every year the Office of Comptroller host the Annual MWBE & Emerging Manger Conference for over 600 MWBE investors. The conference provides an opportunity to minority and women asset managers to learn how to do business with our various asset classes and speed-networking with pension consultants.

Our Agency goals also include:

- [Scheduled reviews of ethnicity composition progress](#)

1. Describe the new and continuing initiatives devoted to innovative enhancement and expansion of the three strategic pillars of Diversity and EEO strategy: **WORKFORCE**, **WORKPLACE**, and **COMMUNITY**. See [“Additional Comments” section below](#).

A. WORKFORCE:

NOTE: Please address the specific recruitment, selection and promotion strategies, sources and procedures in Sections V and VI.

The agency will address underutilization in FY 2020 by:

- Enhancing internal and external applicant pools to address the underutilization.
- Using the quarterly workforce dashboard and identifying specific job groups where underutilization exists to guide recruitment efforts.

The agency will implement the following strategies to address the impending retirement of employees and possible loss or gap in talent:

- Job analysis and skills audit.
- Conduct workforce planning and forecasting.
 - Use the DCAS Retirement Predictor Tools 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.
 - Ensure that there will be a diverse applicant pool for the anticipated vacancies.
 - Evaluate best sources for diverse candidates
 - Encourage agency employees to take promotional civil service examinations by:
 - Sending e-mails with schedule of exams
 - Providing link to specific DCAS exams
 - Posting schedules and exam announcements at the agency intranet
 - Other (specify): _____

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

- Institute coaching, mentoring and cross training programs.
- Identify best practices to retain mature employees.
- Implement initiatives to improve the development and training of employees.
- Promote employee involvement by supporting Employee Resource Groups
- Conduct Diversity and Inclusion Training

Additional Initiatives, Programs, or Comments:

Comments on checked items above:

“Job analysis and skills audit”: The Agency reviews salary structures and adjusts ranges in compliance with citywide increases. The Agency does not hire from a civil service list for every vacancy.

“Identify best practices to retain mature employees”: The Agency identifies best practices to retain ALL employees.

Agency Initiatives:

- Agency-developed surveys designed and administered to receive broad feedback from all Agency employees – and to inform Agency policies and response
- Frequent communication and correspondence with employees regarding EEO policies and diversity events
- Development of an active plan to adjust any imbalances in the Agency’s demographic composition
- Heightened Agency presence at job fairs, colleges, masters programs, etc., in an effort to attract more diverse applicants.
- Meeting with the Agency’s Deputy Comptrollers to heighten their awareness of the need for balance in their bureau workforce ethnicity data and the need for greater diversity during the interview stage

B. 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.

In FY 2019, 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)
- Citywide Onboarding survey
- Citywide Exit Survey for Non-Represented Employees
- Exit interview or surveys developed by the agency

The agency will adopt in FY 2020 the following initiatives based on the analysis of the results of the survey(s): [See “Additional Comments” section below.](#)

- 1.
- 2.

Additional Initiatives, Programs, or Comments:

Agency Initiatives:

- We will continue to issue surveys (i.e. the 2018 Sexual Harassment Climate Survey) designed and administered to get and receive feedback from employees – and to inform Agency policies and response
- The Agency will continue its frequent communications and correspondence with employees regarding EEO policies and diversity events

C. COMMUNITY:

In FY 2020, 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.

Additional Initiatives, Programs or Comments:

Comments on checked items above:

“Continue or plan to promote diversity and EEO community outreach in providing government services

“Promote participation with minority and women owned business enterprises (MWBES).”

– See “Office of Diversity Initiatives” information below.

“Identify best practices for establishing a brand of inclusive customer service” – The Agency does provide best practices for those who do engage with the public.

Agency Initiatives:

The Agency will continue to offer community programming to showcase emphasis on diversity

- The Agency will continue to host or attend job fairs based on recruitment needs
- The Agency will continue its outreach to other agencies, universities, specialized associations.

OFFICE OF DIVERSITY INITIATIVES

The Comptroller’s Office of Diversity Initiatives works to develop innovative solutions that expand economic opportunities for all. The Office is led by the Chief Diversity Officer, an executive level diversity and inclusion strategist reporting directly to the Comptroller. The Chief Diversity Officer serves as a watchdog for the inclusion of women and people of color in competing for public and private sector procurements, and focuses on launching initiatives that put diversity at the heart of the way the City does business.

The Office of Diversity Initiatives is responsible for implementing and monitoring a letter-grading program that holds City agencies accountable to comply with Local Law 1 of 2013 and advocating for additional measures to increase the City’s utilization of minority and women-owned business enterprises (M/WBES).

The Office of Diversity leads the Comptroller’s Advisory Council on Economic Growth through Diversity and Inclusion. Members of the Council hail from a wide variety of local and national backgrounds including supplier diversity procurement specialists,

government, business and community leaders, academics, and advocacy organizations. The Council meets on an annual basis making recommendations on diversity initiatives to the Office of Diversity and Comptroller.

Over the last year, the Office of Diversity Initiatives has championed a City Charter Revision push for a citywide office aimed specifically at increasing MWBE utilization in the City's budget. In November, New Yorkers will have a chance to vote on that Charter Revision Proposal to create a citywide MWBE director reporting directly to the Mayor.

Diversity within the Operations of the Comptroller's Office

The Office of Diversity Initiatives also designs and manages the Comptroller's Office internal M/WBE program. As a result, the office more than tripled its spending with M/WBEs, achieving 37% spending in Fiscal Year 2019, up from 12% in Fiscal Year 2014. (Additional information on solicitation can be found in the Office of Diversity's "Diversity Best Practices in Procurement" memo.) The Office also allocated more than 50% of the Bureau of Law and Adjustment's claims hearings budget to M/WBEs, and it spent more than \$600,000 with M/WBEs utilizing New York City's new M/WBE Small Purchase Method in its first full year of implementation through the Procurement Policy Board Rules.

Also for the first time, the Comptroller's Office began tracking the number of M/WBEs on the prequalified list of certified public accountants, a list of firms that can provide audit services to the City's agencies. The Comptroller's Office changed the criteria for the list to increase access for M/WBE auditors and now accepts both engagement and systems peer reviews. As of August 2019, there were 18 M/WBEs prequalified to provide the City with audit services.

Pension and Corporate Diversity Initiatives

In addition, the Office of Diversity Initiatives works with the Comptroller's Bureau of Asset Management on diversity initiatives involving investment managers and portfolio companies held by the New York City Retirement Systems. In Fiscal Year 2015, the office of the comptroller began to evaluate new managers the composition of their companies, making diversity a requirement during the selection process. By, Fiscal Year 2018, the Comptroller appointed a Diversity and Inclusion Director in the Bureau of Asset Management, the first time the bureau has had staff dedicated to diversity across all asset classes.

In Fiscal Year 2019, in addition to expanding capital commitments to emerging managers, the Comptroller's Office established a goal to allocate 12 percent to emerging managers across each asset class; allocated an additional \$600 million to the direct private equity Emerging Manager Program, bringing total assets committed to the in-house Emerging Manager Program to over \$1.5 billion; and

began an initiative to deploy \$1.5 billion to early-stage and first time fund managers in private equity, real estate, alternative credit, and infrastructure.

The Office of Diversity Initiatives also assists the Corporate Governance team on supplier, workplace and board diversity initiatives. In October 2019, the Comptroller's Office launched the Boardroom Accountability Project 3.0, a new first-in-the-nation initiative calling on companies to adopt a policy requiring the consideration of both women and people of color for every open board seat and for CEO appointments, a version of the "Rooney Rule" pioneered by the National Football League (NFL).

The new initiative is the cornerstone of the Comptroller's Boardroom Accountability Project, a campaign launched in 2014 which seeks to make boards more diverse, independent, and climate competent. The Boardroom Accountability Project brought proxy access to a new, unprecedented milestone of adoption at over 600 companies—a 10,000 percent increase from the initiative's launch in 2014.

Engagement and Outreach

In Fiscal Year 2019, the Office also conducted Comptroller's M/WBE University, which offered a series of workshops designed to increase access to the Comptroller's Office and citywide procurement opportunities for M/WBEs, engaging 1,000 diverse businesses. In addition, every year the Office of Comptroller host the Annual MWBE & Emerging Manager Conference for over 600 MWBE investors. The conference provides an opportunity to minority and women asset managers to learn how to do business with our various asset classes and speed-networking with pension consultants.

Staff Diversity Trainings and Education

The Office of Diversity Initiatives briefs on an annual basis Office of Comptroller procurement staff and deputy comptrollers on the state of diversity citywide and within the agency. The Office offers "Procurement 101" trainings and "Diversity Best Practices" training which includes the role of diversity within the procurement process. In April and June 2019, the Office of Diversity Initiatives and the Agency Chief Contracting Officer (ACCO) conducted webinars to more than 40 M/WBE Officers and ACCOs citywide. During these webinars, the Comptroller's Office trained attendees on how to conduct market analyses in order to create procurements responsive to the M/WBE market and industry trends.

SPECIAL EVENTS:

Below is a list of Cultural events that the Comptroller's Office holds annually around the city to celebrate the diverse cultures of New Yorkers. The Agency always endeavors to use MWBE vendors for food, venue, and sign language interpreters.

- African American History Month

- Lunar New Year
- Irish Community Breakfast
- Women’s History Month
- Haitian Flag Breakfast
- Interfaith Breakfast
- Russian Speaking Community
- Caribbean-American Heritage
- LGBTQ Pride Month Celebration
- Eid Celebration
- African Immigrant Heritage Month
- Hispanic Heritage Month
- Italian Heritage & Culture
- Diwali Celebration
- Jewish Heritage Celebration
- Divine Nine meet and greet breakfast (historically African American, international Greek lettered fraternities and sororities)
- NALFO meet and greet breakfast (The National Association of Latino Fraternal Organizations)

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 2020:

- Review policies, procedures, and practices related to targeted outreach and recruitment.
- Review underutilization in job groups to inform recruitment efforts.
- Direct 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 careers. Currently in operation.

<input checked="" type="checkbox"/> Assess agency job postings to ensure appropriate diversity, inclusion, and equal opportunity employer messaging. <input type="checkbox"/> Share job vacancy notices with the Mayor’s Office for People with Disabilities at nycatwork@mopd.nyc.gov , (212) 788-2830 and ACCES VR by sending the job vacancy notices to Maureen Anderson at Maureen.Anderson@nysed.gov , (212) 630-2329 so they can share it with their clients. <input checked="" type="checkbox"/> Reach out to the DCAS Office of Citywide Recruitment (OCR) as a resource at citywiderecruitment@dcas.nyc.gov . <input checked="" type="checkbox"/> If your agency is an eHire agency, post ALL vacancies on NYC Careers. <input checked="" type="checkbox"/> Ensure that agency personnel involved in both the discretionary and the civil service hiring process have received: <ul style="list-style-type: none"> <input checked="" type="checkbox"/> structured interviewing training <input checked="" type="checkbox"/> unconscious bias training <input checked="" type="checkbox"/> Use the NYCAPS eHire Applicant Interview Log to determine whether recruitment efforts and recruitment sources yield a diverse pool of qualified candidates. <input checked="" type="checkbox"/> Assess recruitment efforts to determine whether such efforts adversely impact any particular group.
<p><i>Additional Strategies, Initiatives and Comments:</i></p> <p><u>Please note:</u></p> <ul style="list-style-type: none"> • The Comptroller’s Office job vacancy notices are sent to Cityjobs on NYC.GOV. They are not sent to the Mayor’s Office. • The Comptroller’s Office does post most – but not all – of its vacancies to NYC.GOV. • The Agency will continue to assess if there’s a recruitment need. To generate interest in a position, we post it. We examine salary structure and assess to see if it affects the application pool. We assess on a bureau-by-bureau basis to see if we need more outreach or need to modify the outreach we’ve done.

Diverse Recruitment Source(s)	What sort of return do you expect to see from the effort? Indicate if this source yielded increased and diverse applicant pool. Were there successful hires from this source?
-------------------------------	---

<p>The Comptroller’s Office reaches out to a variety of publications, organizations, groups and schools with direct access to diverse student, alumni and professional populations. The Agency does not post at the same sources at all times. The recruitment sources used vary and depend on the posting, availability and the Agency’s needs at the time. Sources have included the Society of Women Engineers, Northeast Women in Public Finance, 2020 Women on Boards. We are continuing to target more diverse groups, like the Women’s Bar Association, and the Metropolitan Black Bar Association. We’ve also posted at various local colleges/universities and to their specific minority associations (if available).</p> <p>1.</p> <p>2.</p> <p>3.</p> <p>4.</p> <p>5.</p>	<p>After engagement with every source, we hope to increase the population of that demographic amongst our staff.</p> <p>It is difficult to calculate the return, as applicants don’t always indicate where they heard about a posting. Almost all of the Agency’s postings appear on the Agency website, and then at least 95% are placed on the NYC Jobs (city site).</p> <p>1.</p> <p><input type="checkbox"/> Previous hires from this source</p> <p>2.</p> <p><input type="checkbox"/> Previous hires from this source</p> <p>3.</p> <p><input type="checkbox"/> Previous hires from this source</p> <p>4.</p> <p><input type="checkbox"/> Previous hires from this source</p> <p>5.</p> <p><input type="checkbox"/> Previous hires from this source</p>
---	--

B. Internships/Fellowships

Indicate the type of internship/fellowship opportunities available at your agency. Please provide the number of student interns/fellows employed in FY 2019 and their demographic profiles. Indicate your plans to provide internship/fellowship opportunities in FY 2020.

See “Additional Comments” below.

The agency provided the following internship opportunities in FY 2019:

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 __

* 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 2020.

Additional Comments: The Comptroller's Office has used Ladders for Leaders, the PREA Foundation, Washington Ireland Program, Urban Leadership Fellows, Toigo Foundation and Exalt Youth an intern resource, as well as interns from individual high schools like Brooklyn Collaborative and Lincoln High School. We also recruit our own interns through our summer internship program, and on an as needed basis at other times of year. In several bureaus, especially our Audit bureau, interns are generally retained for longer than one semester and may get offers for full-time employment after graduation.

In 2019, the Agency hired 43 summer graduate and undergraduate interns for the Comptroller's Office summer internship program. See the chart below for race/ethnicity and gender.

	Female	Male	Total
--	--------	------	-------

Asian (including South Asian)	7	4	11
Black	5	6	11
Hispanic or Latino	3	7	10
White	8	3	11
Total	23	20	43

C. 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.

The Agency's goals are to work with HR to assess the population of provisional employees, to recruit more 55-a employees and to determine if there are employees we can transition into 55-a eligibility.

2. Indicate the goals of your 55-a Program Coordinator for FY 2020. 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 2020.

Currently, there are 2 [number] 55-a participants.

There are 0 [number] participants who have been in the program less than 2 years.

Last year, a total of 0 [number] new applications for the program were received

and 0 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.

The agency will review and process new applications for the 55-a program in light of DCAS' policy guidance which states that decisions on 55-a program admissions should take into account the following three criteria:

- a) the severity of the candidate's physical and/or mental disability;
- b) the candidate's previous and/or current encounter with significant barriers to finding employment due to the disability;
- c) the candidate's encounter of obstacles that can prevent him/her from taking civil service examinations due to the disability.

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 CSL § 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 2020 are:

- 1. To work with HR to assess the population of provisional employees
- 2. To recruit more 55-a employees

- 3. Determine if there are employees we can transition into 55-a eligibility

These goals are the same as last year.

Additional Goals, Initiatives, and Comments:

The Agency's 55-a population is small, and we are engaged in an ongoing effort to expand it. For example, we've attended job fairs (i.e., Veterans Job Fair in 2018) in search of 55-a candidates.

VI. Selection (Hiring and Promotion)

1. For FY 2020, if your agency is fiscally able to hire new employees and/or backfill open positions, please discuss the planned duties for your career counselor specific to advising employees of opportunities for promotion as well as overall career development. See "Additional Comments" below.

In FY 2020, 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.
- Inform employees on promotional and transfer opportunities.
- Arrange 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 filing for upcoming civil service exams.

- Provide agency staff with citywide vacancy announcements, civil service exams notices and other career development information.

- Continue to facilitate the use of training to improve skills and access to career opportunities of all employees in its Leadership Program and via referrals to DCAS.

- Assist employees and Job Training Program participants (if applicable) assess and 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:

Please note: Our Agency recruits by reaching out to a variety of publications, organizations, groups and schools with direct access to diverse student, alumni and professional populations.

Our Agency counsels employees using the tactics described above, however, while we do arrange agency-wide notification of promotional opportunities and lateral opportunities via our agency intranet, we do not offer transfers.

2. What are your current new hire and promotional procedures for selection, especially for mid- and high-level discretionary positions?

In FY 2020, the agency will do the following:

- Review and develop a protocol for in-title promotions and salary increases.

- Promote employee awareness of opportunities for promotion and transfer within the agency.

- Assess the criteria for selecting 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.
- 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, the agency head will determine whether the criteria being utilized are job-related. If the criteria are not job-related, the agency will discontinue using that method.
- Compare the demographics of current employees to the placements.
- Revise the promotion request form to include the various reasons why a promotion may be necessary.
- Review the demographics race\ethnicity and gender for those who received the promotion\salary raises.
- Submit the resumes for the second- and third-choices for the position.
- Review the demographics of the senior leadership regularly (by Agency Head).
- Review on a quarterly basis the demographics of those who received promotion and share the information with the Commissioner and Human Resources (by EEO Officer).

Additional Comments:

Please note: The Agency will engage in the practices checked off above, however, as a non-Mayoral agency, the Comptroller's Office does not reach out to the Mayor's Office for recruitment assistance. The Agency does not use the promotion request form referred to above. We do review promotion data with the First Deputy Comptroller and the Deputy for Administration.

3. For FY 2020, indicate how your agency will review the methods by which candidates are selected for new hiring and promotion. Identify the steps that are taken to ensure that selection process is objective and job related. For instance, have you explored/implemented structured interviewing and/or training, panel interviews, etc.?

During FY 2020, the agency will do the following:

- Review policies, procedures, and practices related to hiring (including vacancy announcements, use of certification lists, and the selection process for mission critical occupations) for possible barriers that have a negative impact on minority employees and applicants.
- Use a collaborative effort between EEO, HR and managers where necessary, develop action plans to eliminate identified barriers.
- Develop specific, job-related qualification standards for each position that reflect the duties, functions, and competencies of the position and minimize the potential for gender stereotyping and other unlawful discrimination. Make sure these standards are consistently applied when choosing among candidates.
- Establish written objective criteria for evaluating candidates for hire or promotion and applying those criteria consistently to all candidates.
- 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.
- Have the EEO Officer review the interview questions.

- Have the EEO Officer observe interviews, where possible.
- Use the NYCAPS eHire applicant tracking system for external and internal applicants.
- Make adjustments to agency outreach and recruitment efforts where necessary.
- 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:

Please note: The Agency expects to engage in the practices checked off above, and we're working to enhance our selection process through processes like management structured interview training, increased EEO involvement in the process, and the development of an updated HR Candidate Management application. However, regarding the list above, we do not intend to have the EEO Officer review interview questions.

4. For FY 2020, what steps will your agency take to review the positions filled through a civil service list?

- A. Detail planned actions specific to review of title specification, job description, interview procedures, and selection procedures.
- Reach out to DCAS' Classification at 212-386-0344 to ensure that the job description and specification is current.
 - Review and develop specific, job-related qualification standards for each position that reflect the duties, functions, and competencies of the position and minimize the potential for gender stereotyping and other unlawful discrimination.
 - Use 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.
- B. Discuss your current protocol for use of the NYCAPS Applicant Interview Log reports to identify applicants by gender and race/ethnicity.
- The agency does not use the NYCAPS Applicant Interview Log Report.

- The agency will schedule orientation with NYCAPS Central.
- The agency will use the Applicant Interview Log Report to track applicant sources and identify the best sources of applicants.
- C. 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 and conduct the interviews.
- D. When identifying groups of subject matter experts to assist the DCAS test development team, please describe efforts that will be taken to select a diverse and inclusive group of individuals.
 - 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:

[Please note:](#) The Agency will engage in the practices checked off above. We have our own system for tracking applicants and hiring packages. Regarding the NYCAPS applicant interview log, HR and EEO have access but do not currently use it. If we begin using it, we will use it to track and identify the best sources of applicants.

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

- In FY 2020, 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.
 - Actively monitor agency job postings.

- 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.
- Provide feedback to the hiring manager after the EEO Officer's assessment.
- Assist the hiring manager if a reasonable accommodation is requested during the interview.
- May observe interviews when necessary, especially for underutilized job titles and/or mid- and high-level discretionary positions.
- 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.
- Review hiring package for review and approval.
- Other: _____

Additional Comments:

Please note:

The EEO Officer would review a hiring package ONLY if something about it raises a flag (for example, if there's an issue with demographics, an obvious bias regarding the choice, or something similar).

6. 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 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 2020.
- The agency will analyze the impact of layoffs or terminations on racial,

gender and age groups.

- 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).

Please note: Everyone is not involved in termination decisions. If layoffs are needed, the Agency adheres to civil service law and contractual agreements. Terminations are addressed in a different manner and on a case by case basis.

VII. Training

Please note: See the inserted chart below for planned Agency training sessions.

Training Topic	Type of Audience (e.g. Front-Line Staff, Managers, Supervisors, etc.)	Target Number of Participants	Targeted Dates
1. EEO Awareness (e-learning)			
2. EEO Awareness (classroom)			
3. Everybody Matters (D&I) (classroom)			
4. Everybody Matters (D&I) (e-learning)			
5. Sexual Harassment Prevention (e-learning)			
6. Sexual Harassment Prevention (classroom)			
7. Disability Etiquette			
8. Structured Interviewing and Unconscious Bias (classroom)			
9. Other (specify)			

Please note:

The Agency can reach out to the bureaus to determine their need for training sessions.

The entire Agency can participate in all e-learnings.

Training may also be required as a result of an employee's performance evaluation.

See the inserted charts below for 2019 training accomplishments and 2020 plans.

2019 Training

Training Topic	Target Audience	Mandate /Basis	Training Resource	Notes	Number of Participants/Completions	Dates
Transgender diversity and inclusion	All employees	EO 16. <u>Biennial</u> training requirement	<i>IgbTq: The Power of Inclusion.</i> (eLearning) – DCAS	Existing employees notified to complete the <i>IgbTq: The Power of Inclusion</i> , March 2019. Employees notified re Bathroom Policy, April 2019.	DCAS eLearning: 735 completions as of October 23, 2019	March – December 2019
Sexual harassment prevention (SHP) - Cycle One	All employees	City & State <u>annual</u> training requirement	<i>SHP</i> (eLearning) - DCAS	<u>Cycle One:</u> Conducted 32 live training sessions in June 2018 (97% of employees attended, including managers, supervisors, interns, full-time and part-time) eLearning provided from July 2018 – August 2019.	Agency Classroom: 772 DCAS eLearning: 159 completions as of August 31, 2019	June 2018 – August 2019
Sexual harassment prevention (SHP) – Cycle Two	All employees	City & State <u>annual</u> training requirement	<i>SHP</i> (eLearning) - DCAS	<u>Cycle Two:</u> Employees notified September 2019 to complete eLearning within 30 days.	DCAS eLearning: 667 completions as of October 23, 2019	September 2019 – August 2020
EEO/D&I overview. SHP & IgbTq eLearning.	All new hires	eLearning requirement within 30 days of employment	<i>Orientation</i> (Classroom & eLearning) - Agency Internal & DCAS	Employees receive a mix of eLearning and classroom sessions during their first several weeks of employment	As hired	Monthly

2020 Proposed Training

Training Topic	Target Audience	Mandate /Basis	Potential Training Resource	Notes	Approximate Number of Participants	Proposed Dates
Equal employment opportunity (EEO)	All employees	DCAS recommends <u>biennial</u> training	EEO (eLearning) - DCAS	Recommend 60-day eLearning period for existing employees every other year. Rolling access for new hires	780	2020 Spring
Sexual harassment prevention (SHP) – Cycle Two	All employees	City & State <u>annual</u> training requirement	SHP (eLearning) - DCAS	<u>Cycle Two</u> continues from 9/2019. eLearning available to new hires, interns, existing employees and those returning from leave.	667 complete (as of October 23, 2019)	September 2019 – August 2020
Sexual harassment prevention (SHP) – Cycle Three	All employees	City & State <u>annual</u> training requirement	SHP (eLearning) - DCAS	<u>Cycle Three</u> . Recommend 60-day eLearning period for existing employees every year. Rolling access for new hires and interns.	780	September 2020 – August 2021
EEO/D&I overview. SHP & lgbTq eLearning.	All new hires	SHP training requirement within 30 days of employment	Orientation (Classroom & eLearning) - Agency Internal & DCAS	Employees receive a mix of eLearning and classroom sessions during their first several weeks of employment	As hired	Monthly

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.

- 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 grants or denies request 30 days after submission or as soon as possible.
- The agency head or designee¹ must review and grant or deny the appeal fifteen (15) days after submission of appeal. If NOT the agency head, please provide the name and title of the designee: _Alaina Gilligo, First Deputy Comptroller_____
- The agency follows the City's Reasonable Accommodation Procedure.
- The agency will input the Reasonable Accommodation activity on the DCAS Citywide Complaint and Reasonable Accommodation Tracking System and update the information as they occur.
- The agency analyzes the reasonable accommodation data made at the agency.

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?

Please note: The Agency will engage in the practices checked off above. As a non-Mayoral agency, the Comptroller's Office does not put RA activity on the DCAS tracking system.

Reasonable Accommodation Procedures: The Agency Employees have a right to request a workplace accommodation for a disability; pregnancy, childbirth, or a related medical condition; religion; or based on status as a victim/survivor of domestic violence, a sex offense or stalking. Such requests may be made orally or in writing. Requests for accommodation can be made to the EEO Officer, agency personnel supervising the application process, or the employee's immediate manager and supervisor. All requests should be forwarded to the EEO Office. Employees may

¹ EEO Officer and General Counsel should **NOT** be appointed as agency head designee. Note conflict of interest, i.e., that in the case of an external challenge to the denial of a reasonable accommodation, the agency's GC would be tasked with defending the agency against a decision in which that office was a decision maker on appeal. Refer to the revised Guidelines indicating that neither the EEO Officer nor GC may serve as the agency head's designee found at: <http://extranet.dcas.nycnet/eo/diversityeeo/media/19647/reasonable-accommodation-procedural-guidelines-lc-12116.pdf> (p17).

complete a Request for Reasonable Accommodation form, which is available on the Office intranet. Where the request is made orally, it shall be documented by the person who receives the request. The EEO Officer will advise the requestor of the application procedures required for each request, and work with the employee's manager or supervisor to determine whether the requested accommodation is reasonable and can be granted, consistent with relevant law. The EEO Officer, agency personnel supervising the application process, and managers and supervisors involved in the process shall provide reasonable assistance (such as help in completing forms) to an individual requesting an accommodation. Additionally, if a reasonable accommodation is requested to facilitate an individual's ability to apply for employment, the agency staff supervising the application procedures may be required to assist the applicant in completing the application process. Accommodations will be provided unless doing so would impose an "undue hardship" on the operations of the Comptroller's Office. "Undue hardship" means an action requiring significant difficulty or expense when considered in light of numerous factors. These factors include the nature and cost of the accommodation in relation to the size, resources, nature, and structure of the employer's operation. Undue hardship is determined on a case-by-case basis. If a particular accommodation would be an undue hardship, the Comptroller's Office will try to identify another accommodation that will not pose such a hardship to its operations.

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

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

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, the 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 front-line supervisors, managers and employees were re-trained during FY 2019.
- All managers\supervisors will be re-trained by March 7, 2021.
- All front-line employees will be re-trained by March 7, 2020.

Training Topic	Type of Audience	Target Number of Participants	Targeted Dates
lgbTq – Power of Inclusion (classroom)	Supervisors		
	Front Line Staff		
lgbTq – Power of Inclusion (e-learning)	Supervisors	All employees	All new hires/as hired/monthly
	Front Line Staff	All employees	All new hires/as hired/monthly

- 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: [Please see the 2020 Proposed Training chart in section VII. Training.](#)
 All new hires must fulfill [training requirement within 30 days of employment](#)

B. Executive Order 21 (2016): Prohibition on Inquiry regarding Job Applicant’s Pay History

- The agency has reviewed its practices (including application and interview forms) with regards to prohibition on inquiry regarding pay history.
- All personnel involved in job interviews will be required to go through Structured Interviewing and Unconscious Bias Training.

Additional Comments:

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. Current employees will be trained annually.

Training Topic	Type of Audience	Target # of participants	Targeted Dates
1. Sexual Harassment Prevention (classroom)			
2. Sexual Harassment Prevention (e-learning)	All employees	780	September 2020-August 2021

Additional Comments:
[Please see the 2020 Proposed Training chart in section VII. Training.](#)

D. Local Law 93 (2018): Risk Assessment Survey & Initiatives to reduce/minimize risk of sexual harassment.

Please provide a summary of agency initiatives to address the risk of sexual harassment and devise responsive strategies to minimize such risk. Please refer to the risk assessment survey conducted in 2018 and indicate if the initiatives were completed or are continuing.

[The Comptroller’s Office submitted the Risk Assessment in October 2018, and concluded that none of the conditions listed are present to the extent that they pose risk.](#)

	Initiative(s)	Who is Responsible for implementing the initiative(s)?	Timeframe\Timeline
Risk 1 Homogenous Workplace	<ul style="list-style-type: none"> Review of gender composition: In Engineering, we have observed that there are fewer women in the bureau, and have therefore expanded our recruitment efforts to better 		Ongoing <input checked="" type="checkbox"/> Completed <input type="checkbox"/>

	<p>target women and minority groups by hosting an Engineering job fair in 2017 and will continue related efforts.</p> <ul style="list-style-type: none"> • The Engineering staff does, however, work closely with the Bureau of Law & Adjustment; as such, they frequently engage in work with women as colleagues. In addition, the Chief Engineer reports to the Director of Settlements and Adjudications, who is a woman. • Any trainings and/or opportunities available to the bureau are available to all in the bureau, regardless of gender. • All employees are made aware of external avenues to report concerns. 		
<p>Risk 2 Cultural and Language Differences in the workplace</p>	<p>Strategies in action:</p> <ul style="list-style-type: none"> • Mandatory training: the Agency has provided harassment awareness and 		<p><u>Ongoing</u> <input checked="" type="checkbox"/></p> <p><u>Completed</u> <input type="checkbox"/></p>

	<p>prevention training to all.</p> <ul style="list-style-type: none"> • Offering information about diversity: the Agency provides diversity awareness in the form of policies, posters, Comptroller's Office community events and announcements. • Employee Handbook and Intranet explicitly outline sexual harassment as a violation of not just Agency rules but the law. • "Tone from the top": The Comptroller sets a tone and creates a culture of zero tolerance for sexual harassment that is carried out to permeate the entire Agency. 		
<p>Risk 3 Workplaces with Significant Power Disparities</p>	<p>Strategies in action:</p> <ul style="list-style-type: none"> • We encourage bystander intervention. Employees are instructed to report incidents they witness. 		<p><u>Ongoing</u> <input checked="" type="checkbox"/></p> <p><u>Completed</u> <input type="checkbox"/></p>

	<p>This information has been shared during training and is included in our employee handbook.</p> <ul style="list-style-type: none"> • We require respect across the board among all levels of employees, titles, and operating units. • In the Agency sexual harassment climate survey, we received comments from men expressing concerns that their reports of harassment wouldn't be taken seriously. To combat this feedback, during our Sexual Harassment Awareness and Prevention Training, we reinforced with staff the fact that everyone and anyone can feel this way / experience harassment. • We have a large population of female employees, evenly distributed among all levels of positions in the Agency. 		
Risk 4	Strategies in		<u>Ongoing</u> ☒

Isolated Workplaces	<p>action:</p> <ul style="list-style-type: none">• We have no field offices. All employees are permanently assigned to work in one building. Employees who do go into the field on occasion (auditors, engineers, labor law investigators and public affairs staff) either have a supervisor from our agency traveling with them or they have a supervisor with whom they can readily communicate and to whom they can report.• The Agency's employees work in an open-office environment.• People are given latitude to work with varying degrees of supervision, but everyone has a supervisor.• The Agency workplace is not isolated and employees can easily interact with supervisors and coworkers; however, as the Agency is housed in a public building, it may be open to incidents this		<u>Completed</u> <input type="checkbox"/>
----------------------------	---	--	---

	<p>particular agency cannot always anticipate. We have resources in place should an incident occur, and employees are trained annually regarding how to report such incidents and how to seek avenues for assistance.</p> <ul style="list-style-type: none"> The Agency takes measures to make sure employees are safe. The building could do more to ensure the safety of people assigned here. 		
<p>Risk 5 Decentralized Workplaces</p>	<p>Strategies in action:</p> <ul style="list-style-type: none"> All of our employees are assigned to work in one building. Staff auditors, engineers, labor law investigators and public affairs staff do go offsite, however, they are not alone. They have a supervisor from our agency traveling with them or they have a supervisor with whom they can readily 		<p><u>Ongoing</u> <input checked="" type="checkbox"/></p> <p><u>Completed</u> <input type="checkbox"/></p>

	<p>communicate and to whom they can report. People in the field have access to anyone they need to talk to in order to ensure their safety.</p> <ul style="list-style-type: none"> • We're transparent about information provided to employees. • We post notices (i.e., employee rights, statements on sexual harassment, etc.) on bulletin boards in gathering spaces and on the intranet. 		
Other Findings			<p><u>Ongoing</u> <input type="checkbox"/></p> <p><u>Completed</u> <input type="checkbox"/></p>

E. Local Law 97 (2018): Annual Sexual Harassment Reporting

<p><input type="checkbox"/> The agency will input sexual harassment complaint data on the DCAS Citywide Complaint Tracking System, contemporaneously update the information, and affirm the data in a timely manner when requested by DCAS.</p> <p><input type="checkbox"/> The agency will input all types of complaints in the complaint data on the DCAS Citywide Complaint Tracking System, contemporaneously update the information, and affirm the data in a timely manner when requested by DCAS.</p> <p><input checked="" type="checkbox"/> The agency will ensure that complaints are closed within 90 days.</p>
--

Additional Comments:

The Comptroller's Office will ensure that complaints are closed within 90 days, and we will provide any required data to DCAS – but the Agency is not part of the DCAS Citywide Complaint Tracking System. As a non-Mayoral agency, we do track and provide updated information as required.

F. Local Law 101 (2018): Climate Survey

Describe how additional insights gained from the analysis of the citywide Climate Survey will influence your agency workforce/workplace/community initiatives.

The agency, in collaboration with DCAS, has conducted a climate survey and:

- analyzed results of the response data sent by DCAS.
- implemented the following initiatives to address concerns raised in the Climate Survey: [See "Additional Comments" section below.](#)

- The agency will provide a report to DCAS on the above initiatives by January 31, 2020.

[NOTE: DCAS is mandated to submit a report on Action Plan to the Mayor and the Speaker of the Council].

Additional Comments:

The Agency conducted the DCAS-provided survey in FY19. The Agency expects to continue conducting its own Climate Surveys, incorporating the DCAS survey and adding our enhancements.

As per the DCAS survey results and recommendations, the Agency is committed to the following:

- Increase EEO awareness of EEO policies, laws, and processes to decrease the risk of employees experiencing any form of EEO discrimination. **See Training schedule in section VII.**

- Increase employee familiarity with the EEO complaint process at the start of their employment (i.e., onboarding) and throughout their tenure as this will reduce the risk of experiencing any form of discrimination and sexual harassment. **See Training schedule in section VII.**
- Review, streamline, and standardize the EEO complaint process in accordance with DCAS Office of Equity and Inclusion best practices to ensure employees are/remain aware of this process at their current agency or when they transfer to another agency. **The Agency frequently makes updates to its processes, policies and forms in accordance with DCAS best practices – and the Agency informs employees of these updates.**
- Compare your agency-specific results against the citywide results to determine gaps. **The Agency has compared results, and was pleased to find that our Agency generally had a slightly better response than the City overall. We will work to make sure the responses continue to be positive.**

X. Audits and Corrective Measures:

Please choose the statement that applies 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 2020 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 _____].
Attach a copy of the document setting out the oversight parameters and the agency's most recent report to the oversight agency.

The agency was involved in an audit conducted by the EEPC [the Equal Employment Practices Commission \(EEPC\)](#) or [_____ **another governmental agency – please specify**] specific to our EEO practices. This 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 Comptroller's Office was involved in an audit conducted by the Equal Employment Practices Commission \(EEPC\). See the attached audit findings.](#)

NOTE: Final Agency Head's signature and date should be set only after you receive DCAS' approval of the plan.

Alaina Gilligo

Print Name of Agency Head



Signature of Agency Head

10/21/20

Date

APPENDIX
Contact Information

Please provide contact information (name, title, office address, telephone number and e-mail address) for the following individuals at your agency:

1. Agency EEO Officer

Diane Jones Randall

EEO Officer

Office of New York City Comptroller Scott M. Stringer

1 Centre Street, Room 639, New York, NY 10007

P: (212) 669-3692 | eeo@comptroller.nyc.gov

2. Agency Chief Diversity & Inclusion Officer

Wendy Garcia

Chief Diversity Officer

Office of New York City Comptroller Scott M. Stringer

1 Centre Street, 5th Floor Rm 510, New York, NY 10007

P: 212-669-3538 | wgarcia@comptroller.nyc.gov

3. ADA Coordinator

Diane Jones Randall

EEO Officer

Office of New York City Comptroller Scott M. Stringer

1 Centre Street, Room 639, New York, NY 10007

P: (212) 669-3692 | eeo@comptroller.nyc.gov

4. Disability Rights Coordinator

Diane Jones Randall

EEO Officer

Office of New York City Comptroller Scott M. Stringer

1 Centre Street, Room 639, New York, NY 10007

P: (212) 669-3692 | eeo@comptroller.nyc.gov

5. Disability Services Facilitator

Diane Jones Randall
EEO Officer
Office of New York City Comptroller Scott M. Stringer
1 Centre Street, Room 639, New York, NY 10007
P: (212) 669-3692 | eeo@comptroller.nyc.gov

6. 55-a Coordinator

Diane Jones Randall
EEO Officer
Office of New York City Comptroller Scott M. Stringer
1 Centre Street, Room 639, New York, NY 10007
P: (212) 669-3692 | eeo@comptroller.nyc.gov

7. Career Counselor(s)

Amedeo D'Angelo
Deputy Comptroller-Administration
Office of New York City Comptroller Scott M. Stringer
1 Centre Street, 7th Floor North, New York, NY 10007
(212) 669-2223 | adangel@comptroller.nyc.gov

8. Training Liaison(s)

Naomi K. Clifford
Director, Learning & Professional Development, Bureau of Administration
Office of New York City Comptroller Scott M. Stringer
1 Centre Street, 7th Floor North, New York, NY 10007
212-669-7792 | ncliffo@comptroller.nyc.gov

NYC
Equal Employment
Practices Commission

Angela Cabrera
Malini Cadambi Daniel
Elaine S. Reiss, Esq.
Arva R. Rice
Commissioners

Charise L. Terry, PHR
Executive Director

Judith Garcia Quiñonez, Esq.
Executive Agency Counsel

Jennifer Shaw, Esq.
Executive Agency Counsel/
Director of Compliance

253 Broadway
Suite 602
New York, NY 10007

212. 615. 8939 tel.
212. 676. 2724 fax

December 17, 2018

Scott M. Stringer
Comptroller
Office of the New York City Comptroller
1 Centre Street, Room 517
New York, NY 10007

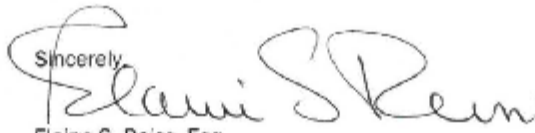
Re: Resolution #2018AP/226-015-(2018)C24: Determination of
Agency Compliance

Dear Comptroller Stringer:

On behalf of the members of the Equal Employment Practices Commission (EEPC), I want to inform you that the EEPC has issued the attached Determination of Compliance to the Office of the New York City Comptroller. The EEPC has determined that the Office of the New York City Comptroller has implemented the required corrective actions it deemed necessary for ensuring a fair and effective affirmative employment program of equal opportunity as required by the EEPC's equal employment opportunity standards and Chapters 35 and 36 of the New York City Charter.

On behalf of the EEPC, I want to thank you, First Deputy Comptroller Alaina Gilligo, and EEO Officer Diane Jones Randall for the cooperation extended to the EEPC.

Sincerely,



Elaine S. Reiss, Esq.
Commissioner

c: First Deputy Comptroller, Alaina Gilligo
Diane Jones Randall, Principal EEO Professional

**EQUAL EMPLOYMENT PRACTICES COMMISSION
CITY OF NEW YORK**

RESOLUTION #2018AP/226-015-(2018)C24: Determination of Compliance (Monitoring Period Required) by the Office of the New York City Comptroller with the Equal Employment Practices Commission's required corrective actions pursuant to the Review, Evaluation and Monitoring of the Sexual Harassment Prevention and Response Practices Audit from January 1, 2016 through December 31, 2017.

Whereas, pursuant to Chapter 36, Section 831(d)(2) and (5) of the New York City Charter (Charter), the Equal Employment Practices Commission (EEPC) is authorized to audit and evaluate the employment practices, programs, policies, and procedures of city agencies and their efforts to ensure fair and effective equal employment opportunity (EEO) for minority group members and women, and to make recommendations to city agencies to ensure equal employment opportunity for minority group members and women; and

Whereas, pursuant to Charter Chapter 36, Section 831(d)(2), the EEPC has adopted *Uniform Standards for EEPC Audits* and *Minimum Equal Employment Opportunity Standards for Community Boards* to assess agencies' EEO programs and policies for compliance with federal, state, and local laws, and regulations, policies, and procedures designed to increase equality of opportunity for women, minorities, and other employees and job applicants identified for protection from discrimination in employment within municipal government; and

Whereas, pursuant to its audit and analysis of the Office of the New York City Comptroller's (NYC Comptroller) EEO Program, the EEPC issued a Preliminary Determination letter, dated September 18, 2018, setting forth findings and the following required corrective actions:

1. Distribute/Post a paper or electronic copy of the *Equal Employment Opportunity Policy, Standards and Procedures to Be Utilized by City Agencies* – or an agency Policy that conforms to city, state and federal laws against sexual harassment– for use by managers, supervisors, and legal, human resources and EEO professionals. Include, or attach as addenda: uniform and responsive procedures for investigating discrimination/sexual harassment complaints, and current contact information for the agency's EEO professionals as well as federal, state and local agencies that enforce laws against discrimination/sexual harassment.
2. Establish and utilize a complaint tracking and monitoring system that permits the agency to identify, in addition to the aforementioned fields, the location, status, the name(s) of the respondent(s), and other information necessary to analyze complaint activity to identify trends.
3. Submit to the EEPC an Annual Plan of measures and programs to provide equal employment opportunity.

Whereas, the NYC Comptroller submitted its response to the EEPC's Preliminary Determination letter, on October 2, 2018, with documentation of its actions to rectify required corrective actions nos. 1 and 2; and

Whereas, in accordance with Charter Chapter 36, Section 832(c), the EEPC considered the agency's response and issued a Final Determination letter on October 4, 2018, which agreed and accepted documentation for implementation of the aforementioned corrective actions, and indicated corrective action no. 3 required compliance monitoring; and

Whereas, the NYC Comptroller submitted its response to the EEPC's Final Determination letter on October 31, 2018; and

Whereas, in accordance with Charter Chapter 36, Section 832(c), the EEPC monitored the agency's implementation of the remaining corrective action from November 2018 through December 2018, with no extension of the monitoring period; and


Whereas, at the EEPC's request pursuant to Charter Section 815.a.(15), the NYC Comptroller submitted a copy of the First Deputy Comptroller's memorandum to staff dated December 14, 2018, which outlined the corrective actions implemented in response to the EEPC's audit and reiterated her commitment to the agency's EEO Program; and

Whereas, all of the EEPC's corrective actions are required by, or are consistent with, federal, state, and local laws, and regulations, policies and procedures designed to increase equality of opportunity for women, minorities, and other employees and job applicants identified for protection from discrimination in employment within municipal government. Now Therefore,

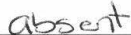
Be It Resolved, that the Office of the New York City Comptroller has implemented the required corrective actions deemed necessary to ensure compliance with the EEPC's equal employment opportunity standards and the requirements of Charter Chapters 35 and 36.

Be It Resolved, that the EEPC will forward this Determination of Compliance to the New York City Comptroller Scott M. Stringer of the Office of the New York City Comptroller.

Approved unanimously on December 17, 2018.



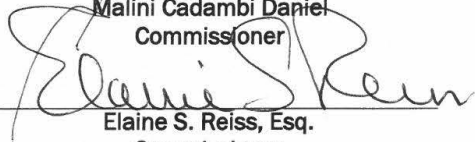
Angela Cabrera
Commissioner



Arva R. Rice
Commissioner



Malini Cadambi Daniel
Commissioner



Elaine S. Reiss, Esq.
Commissioner



This
Determination of Compliance

is issued to the

Office of New York City Comptroller

for successfully implementing 3 of 3 required corrective actions pursuant to the Equal Employment Practices Commission's Sexual Harassment Prevention and Response Practices Audit from January 1, 2016 to this date.

On this 17th day of December in the year 2018,

Elaine S. Reiss, Esq., Commissioner

Charise L. Terry, PHR, Executive Director

*In care of New York City Comptroller Scott M. Stringer
and Principal EEO Professional Diane Jones Randall*