

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

Fiscal Year 2023

Administration for Children's Services (ACS)

NYC Children

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I. Commitment and Accountability Statement by the Agency Head

On behalf of the NYC Administration for Children's Services, 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 James Keys 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. Upon appointment of a permanent EEO Officer, the agency will ensure that person's contact information is prominently available to all employees as well.

During this Fiscal Year 2023, 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

[Describe below key initiatives and accomplishments that your agency undertook last fiscal year (2022) to advance DEI and EEO goals, for example, recognizing employee contributions to DEI goals through awards and employee appraisal, introducing new equity programs, training all staff on mandatory training, or launching employee resource groups. Add additional lines as needed.]

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

1. ACS appointed an EEO Officer to relieve the Interim EEO Officer.
2. ACS continues to support its Executive Director and Office of Equity Strategies (OES) in its mission is to provide direction to staff and implement the agency's plan to address inequity and develop strategies to promote racial equity.
3. ACS divisions continue to engage in Race, Diversity and Intersectionality ("RDI") Reflective Process sessions to discuss racial equity issues. ACS continues to hold Healing Circles, as needed and open to the entire agency, to enable employees to discuss racial equity issues and process race-related events.
4. ACS organized and held events in recognition of LGBTQ+/Pride Month.
5. ACS sponsors the Annual ACS LGBTQ and Ally Awards to recognize actions of: 1) an LGBTQ or ally youth; 2) an affirming foster parent(s); 3) an affirming staff at ACS; 4) an affirming staff at foster care agencies; and 5) a community advocate.
5. ACS will continue to recognize employees, supervisors, managers, and agency units demonstrating superior accomplishment in diversity and equal employment opportunity in FY 2023.
6. Throughout the year, ACS sponsors many events to celebrate the diversity of our workforce, including events highlighting Black History Month, Hispanic Heritage Month, Asian American and Pacific Islander Heritage Month, disability awareness and LGBTQ Pride.

III. Workforce Review and Analysis

Please provide the total agency headcount as of 6/30/2022

Total Headcount: 6,344

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 2023, 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 2023, the agency will inform and remind employees of the option to add preferred name in ESS.

2. [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.

[Select the options that apply to your agency.]

Agency Head

- Quarterly Semi-Annually Annually Other _____

Human Resources

Quarterly Semi-Annually Annually Other _____

General Counsel

Quarterly Semi-Annually Annually Other _____

Other (___ 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 2023

[State below the central goals of your strategy for FY 2023 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:**

- ACS will continue to develop and implement strategies focused on building an inclusive and sustainable pipeline for our Agency across all levels, including staff recruitment, development and succession planning initiatives.
- **Workplace:** ACS will continue to develop and implement strategies focused on fostering an inclusive work environment that values the differences each of our unique employees bring to work. We will continue to develop and implement strategies for recruiting, retaining, and developing talent across all levels of our Agency; continue to support affinity groups; conduct staff engagement surveys and sexual harassment risk assessments; and implement recommendations.

❖ **Community:**

- To establish our Agency as a leading service provider in New York City, ACS will continue to develop and implement strategies focused on inclusion, cultural competency, and reflecting the vast communities we serve. As part of ACS' MWBE goals and initiatives, we will continue to identify procurements that are eligible for MWBE utilization and participate in MWBE events for human and social services agencies and small agencies.

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

- [Describe special initiatives to enhance equity, inclusion, and race relations in your agency programs and activities. (Age inclusivity, non-traditional minorities inclusion initiatives, engagement of traditional and older employees in inclusion efforts and discussion forums)]

ACS Equity Summary:

ACS is committed to reducing racial disproportionality within our system and becoming an anti-racist organization.

ACS is continuing to develop and implement its Race Equity Action Plan.

ACS completed a race equity assessment to identify policies and practices that may be implemented to address disparate outcomes based on race and developed a Race Equity Action Plan based on that assessment.

Examples of the work ACS has implemented related to its Race Equity Action Plan:

- **Reducing COS filings:** ACS reduced the number of Court Ordered Supervision (COS) filings through a pilot where families were referred to ACS prevention services early in cases. As a result of the success, this early engagement was included as a component of ACS's new prevention services contracts (implemented July 1, 2020) and is now required for all prevention providers. ACS had been reducing its use of COS, with a 23% decrease from CY2017 to CY2019. In CY2020, ACS filed 33% fewer cases seeking COS than in CY2019.
- **Increasing Kinship Placement:** ACS has increased the proportion of all children in foster care placed with kin from 31% in 2017 to more than 42.5% in Spring 2021. Kinship placements for Black/African American children have increased similarly, from 32.5% to 42.8%. Even during the COVID-19 pandemic, more than half of the children who entered foster care were placed with kinship caregivers.
- **Redesigned Prevention Service System:** ACS's redesigned prevention service system was implemented in July 2020. With these new contracts, the new system promotes racial equity through mandated requirements for providers to address racial disparities in all programs, encouraging provider agencies to hire staff who speak the prevalent languages within the communities they serve and review their board of directors to determine if they need to increase diversity.
- **CARES Expansion:** ACS rebranded and expanded its CARES (Collaborative Assessment, Response, Engagement and Support) program to every borough in New York City. CARES, also known as Family Assessment Response, is a core strategy for combating racial disparity and promoting social justice in NYC's child welfare system. The CARES track offers a less intrusive response for families with service needs and helps enable families to drive solutions for themselves.

- **Restorative Justice:** ACS received private funding to develop new restorative justice interventions as part of a long-term behavior management program implementation in secure detention and in Close to Home. ACS plans to develop capacity to facilitate restorative justice circles and mediation services for youth and staff.

To ensure that ACS has a foundational framework across the agency, ACS continues to require staff to take the ACS developed learning program “Understanding and Undoing Implicit Bias”. This program includes an online training module that is mandated for all ACS staff, and an all-day, instructor-led course that is required for all direct service staff.

ACS has also rolled out our new scoring tool for interviews agency wide, and all interviews are required to follow the structured interview process. ACS will also be rolling out an interview guide which includes sample behavioral and situational interview questions based on a skill set hiring managers are looking for and a guide on the structured interview process.

Further ACS’ Racial Equity and Cultural Competence Committee facilitates events and conversations about racial equity and cultural competency to educate and raise awareness among ACS staff and their contracted provider agencies. ACS's cultural affinity groups routinely host panel discussions, cultural education events, movie discussions and other events that recognize and celebrate the diverse races and ethnicities of ACS staff and the communities we serve.

2. Planned Programs, Initiatives, Actions

[Describe the ongoing and new programs, actions, and initiatives planned for FY 2023, which are aimed toward enhancement and expansion of the three foundations of Diversity and EEO strategy: Workforce, Workplace, and Community.]

A. Workforce

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

Regarding Workforce strategizing, ACS will continue to develop and implement strategies focused on building an inclusive and sustainable pipeline for our Agency across all levels, including staff recruitment, development and succession planning initiatives. A more detailed description is fleshed out in the later sections of this Diversity, Equity, Inclusion plan.

[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.]

2. [Describe how your agency will address underutilization in FY 2023. 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.]

ACS utilizes Inclusive Recruitment Guide Issued by the Office of Citywide Equity and Inclusion to develop strategic recruitment plans. This will include partnering with DCAS and the Mayor’s Office for People with Disabilities with the agency’s participation in the 55-a program to assist with underutilization. Greater detail of the plan is given in the later sections of this Diversity, Equity, Inclusion plan.

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.).]

ACS will continue to develop and implement strategies focused on fostering an inclusive work environment that values the differences each of our unique employees bring to work. We will continue to develop and implement strategies for recruiting, retaining, and developing talent across all levels of our Agency; continue to support affinity groups; conduct staff engagement surveys and sexual harassment risk assessments; and implement recommendations. Details of these strategies are given in the later sections of this Diversity, Equity, Inclusion plan.

[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.]

In FY 2023, 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 and civil service exams internally and externally, 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.]

ACS will implement the following recruitment strategies and initiatives in FY 2023:

- 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, (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.
- Reach out to the DCAS Office of Citywide Recruitment (OCR) as a resource at citywiderecruitment@dcas.nyc.gov
- Post all vacancies on NYC Careers.

ACS will ensure that our agency staff that are involved in both the discretionary and the civil service hiring process have received:

- Structured Interviewing training
- Everybody Matters EEO and Diversity and Inclusion Training
- We will assess recruitment efforts to determine whether such efforts adversely impact any group.

Additional Strategies, Initiatives and Comments:

We strive to be sure we are diversifying our interview panels, websites and social media sites where positions are advertised.

The Office of Human Resources will create language that is more inclusive and demonstrates our commitment to equity and inclusion by updating our job postings to provide our diverse pool of candidates a better understanding of daily responsibilities and work lifestyle. Postings will be refreshed to avoid following the solely task-oriented traditional posting structures commonly used in job advertisements.

We will convey defined core competencies needed for positions where specific skills are necessary to thrive within our organization. The core competency focus for ACS will be those individuals who demonstrate enthusiasm for, and commitment to the position and accepts responsibility for personal actions, commits to meeting the expectations of internal and external customers, supports a positive team environment in which members participate, respects and cooperates with others to drive mission targeted results.

We will continue to review job descriptions to replace words that can portray an unintentional bias. The team will continue to review postings and remove gender specific pronouns (He/She) and ensure that the agency is taking measures to attract all candidates that are interested in an opportunity to work at ACS. These measures will ensure that the focus is solely placed on a candidate's skills and our agency's values.

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.]

Diverse Recruitment Source(s)	What sort of return do you expect to see from the effort? Indicate if this source yielded diverse applicant pools.
1. American Association of Blacks in Higher Education (AABHE)	1. Previous hires from this source, indicates that we can continue to expect potential new hires.
2. Hispanic/Latino Professionals Association (HLPAs)	2. Previous hires from this source, indicates that we can continue to expect potential new hires.
3. Pink-Jobs.com (LGBT+ friendly, equal opportunity job board)	3. Previous hires from this source, indicates that we can continue to expect potential new hires.
4. The HBCU Career Center	4. Previous hires from this source, indicates that we can continue to expect potential new hires.
5. Recruitdisability.org (Job board for candidates with disabilities)	5. Previous hires from this source, indicates that we can continue to expect potential new hires.

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 2022 and their demographic profiles, based on self-ID data. Indicate your plans to provide internship/fellowship opportunities in FY 2023. 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.]

ACS provided the following internship opportunities in FY 2022:

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 (NYC Vista)	2	Race not indicated	M __ F__ Non-Binary __ Other __ Unknown __
3. Summer College Interns	162	Race not indicated	M __ F__ Non-Binary __ Other __ Unknown __
4. Summer Graduate Interns	13	Race not indicated	M __ F__ Non-Binary __ Other __ Unknown __
5. Other (specify): Reservists	39	Race not indicated	M __ F__ Non-Binary __ Other __ Unknown __

- 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 plans to provide internship/fellowship opportunities in FY 2023.

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 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 3 [number] 55-a participants.
- 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] _____.

[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.]

ACS has and will continue to work in partnership with DCAS and the Mayor's Office for People with Disabilities to participate in informational sessions for interested 55-a individuals. ACS' goal is to increase the number 55-a applicants and ultimately enroll new hires year over previous year. The agency will continue to include language on our external advertisements indicating that our agency is a participant in the 55-a program. Additionally, when discussing job postings with hiring managers, external sites like recruitdisability.org will be offered up as an option for sourcing candidates. ACS will also continue to share job vacancies notices (JVN) with the Mayor's Office of People with Disabilities.

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

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

[Describe the plans of the agency Career Counselor(s) to promote advancement and transfers within the agency, advise employees of opportunities for promotion, availability of civil service exams, and provide resources to help employees grow and develop future careers.]

In FY 2023, the agency's Career Counselor will continue to perform the following tasks:

- Review policies, procedures, and practices related to hiring (including vacancy announcements, use of civil service lists, and the selection process for mission critical occupations).
- Promote employee awareness of opportunities for promotion and transfer within the agency.
- Arrange for agency wide notification of promotional and transfer opportunities.
- Encourage the use of training and development programs to improve skills, performance and career opportunities.

- Provide information to staff on both internal and external Professional Development training sources.
- Explain the civil service process to staff and what it means to become a permanent civil servant.
- Provide technical assistance in applying for upcoming civil service exams.
- Provide agency staff with citywide vacancy announcements, civil service exams notices and other career development information.
- Assist employees and Job Training Program participants in assessing and planning to develop career paths.

Additional Initiatives and Comments: OHR has developed Civil Service trainings for upcoming exams that are heavily used in the agency. These trainings advise staff on qualification requirements, relevant experience and potential scores/rankings and list movement. Additionally, OHR administers a Civil Service 101 training; highlighting the civil service process, differences between competitive and no-competitive titles, career paths within the City of New York and traversing the NYC civil service hiring system.

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.]

In FY 2023, the agency will do the following:

- Review, revise the protocol for in-title promotions and salary increases, which includes:
 - Promotion and salary increase protocol in existence.
 - Assess the criteria for selecting/promoting persons for mid-level to high level positions.
- Publicly post announcements for 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 promotion justification is included in all promotion requests.

C. EEO Role in Hiring and Selection Process

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

In FY 2023, 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 2023.
- 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 1 must be completed by March 31, 2023.)	6,344	02/28/2023
2. Everybody Matters: EEO and Diversity & Inclusion Training for NYC Employees (classroom/live webinar)	All employees – Biennially (Cycle 1 must be completed by March 31, 2023.)	6,344	02/28/2023
3. Sexual Harassment Prevention (e-learning)	All employees – Annually (Cycle 5 runs between September 1, 2022 – August 31, 2023)	6,344	07/31/2023
4. Sexual Harassment Prevention (classroom/live webinar)	All employees – Annually (Cycle 5 runs between September 1, 2022 – August 31, 2023)	6,344	07/31/2023

5. IgbTq – Power of Inclusion (e-learning)	Managers, Supervisors, and Front-line employees All other employees	6,344	02/28/2024
6. IgbTq – Power of Inclusion (classroom/live webinar)	Managers, Supervisors, and Front-line employees All other employees		
7. Disability Awareness and Etiquette			
8. Structured Interviewing and Unconscious Bias (classroom/live webinar)			
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 designee¹ : Eden Hauslaib – ACS Chief Accountability Officer
- The designee reports directly to the Agency Head.
- The agency will input the Reasonable Accommodation activity on the DCAS Citywide Complaint and Reasonable Accommodation (CAD) Database and update the information as needed.

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

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

- 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 5 – September 1, 2022 – August 31, 2023) 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.

¹ EEO Officer and General Counsel should **NOT** be appointed as agency head designee for review of appeals to reasonable accommodation decisions. Refer to the revised guidelines below. Note the conflict of interest; in the event of an external challenge to the denial of a reasonable accommodation, the agency's General Counsel would be tasked with defending the agency against a decision in which that office was a decision maker on appeal.

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 1: April 1, 2021 – March 31, 2023) as indicated in the Section VII Training above.

D. Executive Order 16: Training on Transgender Diversity and Inclusion

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

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

All 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.

E. Local Law 101 (2018): Climate Survey

[Using the template provided in Appendix B, submit a detailed action plan that address concerns and issues raised in the 2020 Workplace Climate Survey.]

[Note: DCAS is mandated to submit a report on Action Plans to the Mayor and the Speaker of the Council by December 31, 2022].

The agency, in collaboration with DCAS, has conducted a climate survey in 2021 and:

Analyzed the 2021 Climate Survey data provided by DCAS.

Will review or has reviewed the results of the survey with agency head and senior leadership.

Developed an action plan in consultation with agency head and senior leadership [template included in the appendix] outlining the initiatives and actions that will be adopted by the agency in response to the 2021 Workplace Climate Survey data.

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 2023 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.]

Print Name of Agency Head

Signature of Agency Head

Date

Appendix A: Contact Information for Agency EEO Personnel

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

	Title/Function	Name	Email	Telephone
1.	Agency EEO Officer James Keys	James Keys	James.Keys@acs.nyc.gov	212-442-2356
2.	Agency Deputy EEO Officer [if appointed]	Vacant		
3.	Agency (Chief) Diversity & Inclusion Officer [if appointed]	Winette Saunders	Winette.saunders@acs.nyc.gov	212-341-9005
4.	Chief Diversity Officer/Chief MWBE Officer per E.O. 59			
5.	ADA Coordinator	James Keys (Acting)	James.Keys@acs.nyc.gov	212-442-2356
6.	Disability Rights Coordinator	James Keys (Acting)	James.Keys@acs.nyc.gov	212-442-2356
7.	Disability Services Facilitator	James Keys (Acting)	James.Keys@acs.nyc.gov	212-442-2356
8.	55-a Coordinator	Brandon Respress	Brandon.Respress@acs.nyc.gov	212-676-2589
9.	EEO Investigator(s)	Myra Garcia	Myra.Garcia@acs.nyc.gov	212-341-4164
10.	Career Counselor(s)	Brandon Respress	Brandon.Respress@acs.nyc.gov	212-676-2589
11.	EEO Training Liaison(s)			
12.	EEO Counselor(s)	Myra Garcia	Myra.garcia@acs.nyc.gov	212-341-4164

Appendix B: 2020 Climate Survey Action Plan

[Please provide a detailed description your agencies plan to address the target areas and objectives identified by DCAS. For each target area and objectives, include the planned actions, initiatives, programs or policies, the intended reach, and the office responsible for implementation. More than one initiative is encouraged to address a target area and objective.]

1. Target area and objective: Increase employees' familiarity with the EEO Policy.

- **Planned actions, initiatives, programs, or policies:** [Please provide detailed description of each effort. More than one initiative is encouraged to address a target goal]
 - Example: The EEO Office will circulate quarterly agency wide email including EEO resources, including the revised EEO Policy.

- **Intended reach** [Please include specific strategies for staff who may not have access to computers.]
 - Example: All staff, including, senior executives, managers, interns, consultants, etc.

- **Who will be responsible for implementing the action?** [Indicate all offices/units responsible.]
 - Example: EEO Office

2. Target area and objective: Improve the EEO Office's visibility to the workforce.

- **Planned actions, initiatives, programs, or policies:** [Please provide detailed description of each effort. More than one initiative is encouraged to address a target goal]

- **Intended reach** [Please include specific strategies for staff who may not have access to computers.]

- **Who will be responsible for implementing the action?** [Indicate all offices/units responsible.]

3. Target area and objective: Improve employees' knowledge of the EEO complaint process, including where and how to file a formal complaint, and what happens after a complaint is filed.

- **Planned actions, initiatives, programs, or policies:** [Please provide detailed description of each effort. More than one initiative is encouraged to address a target goal]

- **Intended reach** [Please include specific strategies for staff who may not have access to computers.]

- **Who will be responsible for implementing the action?** [Indicate all offices/units responsible.]

4. Target area and objective: Increase employees' understanding of protected rights and prohibition of discrimination, including sexual harassment, in the workplace.

- **Planned actions, initiatives, programs, or policies:** [Please provide detailed description of each effort. More than one initiative is encouraged to address a target goal]

- **Intended reach** [Please include specific strategies for staff who may not have access to computers.]

- **Who will be responsible for implementing the action?** [Indicate all offices/units responsible.]

5. Target area and objective: Improve managers' and supervisors' awareness of measures that an employee may take to report any violations under the EEO Policy, including discrimination and sexual harassment.

- **Planned actions, initiatives, programs, or policies:** [Please provide detailed description of each effort. More than one initiative is encouraged to address a target goal]
- **Intended reach** [Please include specific strategies for staff who may not have access to computers.]
- **Who will be responsible for implementing the action?** [Indicate all offices/units responsible.]

6. Target area and objective: Improve managers' and supervisors' knowledge of whom and where to direct employees who may want to discuss a complaint (s) under the EEO Policy.

- **Planned actions, initiatives, programs, or policies:** [Please provide detailed description of each effort. More than one initiative is encouraged to address a target goal]
- **Intended reach** [Please include specific strategies for staff who may not have access to computers.]
- **Who will be responsible for implementing the action?** [Indicate all offices/units responsible.]