



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

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

Fiscal Year 2023

Conflicts of Interest Board

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I. Commitment and Accountability Statement by the Agency Head

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

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

COIB recognizes the value in maintaining a diverse and inclusive workforce and affirms its commitment to promoting a work environment that tolerates and appreciates differences among employees. COIB regularly reviews its programs and procedures to effectuate fair and equitable employment practices for all COIB employees, applicants, clients, customers, consultants, vendors, interns, and contracted employees, in compliance with all relevant federal, State, and City laws. COIB has issued an annual Diversity, Equity, Inclusion and Equal Employment Opportunity (“DEI-EEO”) Plan in accordance with these values. All COIB staff are responsible for the effective implementation of the DEI-EEO Plan.

For more information or to report discrimination, contact COIB’s EEO Officer, Katherine J. Miller at kmiller@coib.nyc.gov or 212-437-0730.

☐ This statement is the same as last year.

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

II. Recognition and Accomplishments

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

1. COIB has a 100% completion rate for the Sexual Harassment Prevention Training.
2. COIB continued its efforts to expand its recruitment sources to attract a larger pool of applicants to increase the diversity of potential candidates for its job vacancies. As part of its efforts, COIB added three affinity bar associations, four affinity organizations, and seven general job boards to COIB’s list of potential recruitment sources (budget permitting). Additionally, COIB participated in a college career fair, added more colleges to its list of schools for sharing job postings, and revised its website to better promote its job vacancies and to include the City’s revised EEO anti-discrimination statement. These expanded recruitment efforts resulted in the hiring of minority group members and women.
3. COIB added a question to its exit interview to assess reason(s) for departure.

4. The Agency Head sent an email to all Staff ahead of Juneteenth explaining the history of the holiday, listing celebrations throughout the City, and providing resources to learn more.

5. As part of its Non-Managerial Staff Incentive Program, COIB recognized and rewarded two members of Staff who performed above and beyond in serving the agency.

III. Workforce Review and Analysis

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

Total Headcount: 24

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

Agency Head

☐ Quarterly ☐ Semi-Annually ☒ Annually ☐ Other _____

Human Resources

☐ Quarterly ☐ Semi-Annually ☒ Annually ☐ Other _____

General Counsel

☐ Quarterly ☐ Semi-Annually ☒ Annually ☐ Other _____

Other (EEO Officer)

☒ Quarterly ☐ Semi-Annually ☐ Annually ☐ Other _____

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

IV. EEO, Diversity, Inclusion, and Equity Initiatives for FY 2023

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

❖ Workforce:

COIB's goal is to monitor for and address underutilization and underrepresentation of minority group members and women in its job groups.

❖ Workplace:

COIB's goal is to foster an environment that respects and promotes diversity, equity, and inclusion.

❖ Community:

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

❖ Equity, Inclusion and Race Relations Initiatives:

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

2. Planned Programs, Initiatives, Actions

A. Workforce

The EEO Officer regularly reviews the agency's workforce composition reports to monitor for underutilization and underrepresentation of minority group members and women in the agency's job groups. The EEO Officer, Agency Head, Human Resources Director, and General Counsel meet annually to discuss workforce composition, demographic trends to be considered when making decisions about recruitment, hiring, promotions, and attrition, and potential workplace barriers that may contribute to underutilization or underrepresentation.

To help develop and retain employees, COIB has a Non-Managerial Staff Incentive Program to recognize and reward Staff who perform above and beyond.

COIB has a social committee, which includes a Staff representative from each work unit, that periodically organizes agencywide events where all Staff have a chance to interact with one another.

According to the latest workforce composition report as of June 30, 2022, COIB does not have statistically significant underutilization in any job group.

B. Workplace

Each year, COIB circulates its EEO Policy Statement and EEO Policy to inform Staff of their rights and protections under the City's EEO Policy. COIB's EEO Policy, as well as the City's anti-hate and anti-discrimination posters, are posted on COIB's intranet. COIB keeps Staff informed of the EEO complaint and reasonable accommodation processes, and circulates the DCAS EEO Complaint Procedural Guidelines, EEO Complaint Process At a Glance, and Reasonable Accommodations Procedural Guidelines.

Because COIB is a tiny agency, there are limited resources and limited staff for a Diversity Council, Employee Resource Groups, and/or diversity programming within the agency. The EEO Officer and Human Resources Director are planning to contact other City agencies to identify programming aimed at enhancing equity and race relations and to discuss the possibility of including COIB Staff in that programming. The EEO Officer and Human Resources Director will also work to identify programming that is available to all City employees, such as those offered by WorkWell NYC, with the goal of promoting those programs with Staff. In connection with heritage months and City holidays, COIB is aiming to send emails to Staff about three times a year to share information about relevant programs, resources, and activities. For instance, during 2022, the Agency Head sent an email to all Staff ahead of Juneteenth explaining the history of the holiday, listing celebrations throughout the City, and providing resources to learn more.

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

List below the names of existing ERGs:

- 1.
- 2.
- 3.

- ☐ 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

To the extent feasible, COIB will continue to utilize a minority-owned business to provide services at the workplace.

The EEO Officer will continue to share resources with the Education & Engagement Unit, which is responsible for COIB's website and social media posts, to ensure that COIB is creating accessible digital content.

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

To the extent feasible within its budget, and as job vacancies arise, COIB will continue to expand its recruitment sources to attract a larger pool of applicants to increase the diversity of potential candidates. The EEO Officer will review the demographics of applicants to assess whether COIB's recruitment sources are yielding sufficiently large and diverse applicant pools.

B. Recruitment Sources

1. Job boards such as Indeed, the Public Service Jobs Directory, the Network of Bar Leaders, and the New York State Job Bank. The agency works to reach a larger pool of applicants to increase the diversity of potential candidates. These sources have resulted in previous hires.
2. College and law schools, including historically black colleges and universities ("HBCUs"). The agency works to reach a larger pool of applicants to increase the diversity of potential candidates and added HCBUs to its list of schools to reach more minority group members. These sources have resulted in previous hires.
3. Regional bar associations, such as the New York City Bar Association, as well as affinity bar associations, such as the Metropolitan Black Bar Association, National Native American Bar Association, New Jersey Muslim Lawyers Association, and New Jersey Women Lawyers Association. The agency works to reach a larger pool of applicants as well as minority group members to increase the diversity of its potential candidates. These sources have not resulted in previous hires.

4. Emails to contacts in City government, including emails to minority group members, to Agency Personnel Officers at other agencies, and to the DCAS Office of Citywide Recruitment (OCR), to inform them of job openings and encourage them to share job postings with potential candidates. The agency works to reach a larger pool of applicants as well as minority group members to increase the diversity of its potential candidates. This source has resulted in previous hires.

5. Social media, such as Twitter, Instagram, and LinkedIn. The agency works to reach a larger pool of applicants to increase the diversity of potential candidates. These sources have not resulted in previous hires.

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

C. Internships/Fellowships

The agency 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			M __ F__ Non-Binary __ Other __ Unknown __
2. Public Service Corps			M __ F__ Non-Binary __ Other __ Unknown __
3. Summer College Interns			M __ F__ Non-Binary __ Other __ Unknown __
4. Summer Graduate Interns			M __ F__ Non-Binary __ Other __ Unknown __
5. Other (specify):			M __ F__ Non-Binary __ Other __ Unknown __

COIB does not currently offer internship or fellowship opportunities because it lacks the physical space for an intern or fellow to work.

D. 55-a Program

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

- Presently, the agency employs no 55-a participants.
- There are 0 participants who have been in the program less than 2 years.

- In the last fiscal year, a total of 0 new applications for the program were received and n/a participants left the program due to n/a.

☒ Agency uses mostly non-competitive titles which are not eligible for the 55-a Program.

☒ Agency does not use the 55-a Program and has no participating employees.

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

VI. Selection (Hiring and Promotion)

A. Career Counselors

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

B. New Hires and Promotions

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

The EEO Officer and Human Resources have created an outline of potential recruitment efforts to guide the posting and marketing of job vacancies. For each job vacancy, these potential recruitment efforts are discussed with the hiring manager and implemented as appropriate for the open position.

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

C. EEO Role in Hiring and Selection Process

In FY 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: COIB keeps an internal Applicant Interview Log to track recruitment sources and the outcome of all hiring processes. Post-selection, the EEO Officer conducts a job applicant analysis comparing interview outcomes to the NYCAPS Applicant Demographic report to advise Human Resources of any demographic trends and/or EEO concerns based on available self-ID data.

D. Layoffs

During periods of layoffs, terminations, and demotions due to legitimate business/operational reasons, what is your protocol for analyzing the impact of such actions based upon gender, race, and age?

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

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.)	25 (assuming fully staffed)	February 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.)	n/a (all e-learning)	
3. Sexual Harassment Prevention (e-learning)	All employees – Annually (Cycle 5 runs between September 1, 2022 – August 31, 2023)	25 (assuming fully staffed)	July 2023
4. Sexual Harassment Prevention (classroom/live webinar)	All employees – Annually (Cycle 5 runs between September 1, 2022 – August 31, 2023)	n/a (all e-learning)	
5. lgbTq – Power of Inclusion (e-learning)	Managers, Supervisors, and Front-line employees All other employees (every 2 years)	25 (assuming fully staffed)	February 2024

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

VIII. Reasonable Accommodation

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

- ☒ 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 : _____

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.

- ☐ 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.

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

The agency, in collaboration with DCAS, has conducted a climate survey in 2020 and:

- ☒ Analyzed the 2020 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 outlining the initiatives and actions that will be adopted by the agency in response to the 2020 Workplace Climate Survey data.

X. Audits and Corrective Measures

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

XI. Agency Head Signature

CAROLYN LISA MILLER

Print Name of Agency Head


Signature of Agency Head

11.14.22

Date

Appendix A: Contact Information for Agency EEO Personnel

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

Appendix B: 2020 Climate Survey Action Plan

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

➤ Planned actions, initiatives, programs, or policies:

The EEO Officer will send an annual email to all Staff with COIB's EEO Policy Statement and EEO Policy, including links to access the City's EEO Policy and EEO Handbook. A copy of the policy will be posted on COIB's intranet and on the office bulletin board. The EEO Officer will also send an annual email to all Staff with the DCAS EEO Complaint Procedural Guidelines, EEO Complaint Process At a Glance, and Reasonable Accommodations Procedural Guidelines.

➤ Intended reach:

All Staff.

➤ Who will be responsible for implementing the action?

EEO Office.

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

➤ Planned actions, initiatives, programs, or policies:

Because COIB is a tiny agency with one physical work location and all Staff have a work computer and email account, Staff are familiar with the EEO Office. As part of the onboarding process, new hires meet the EEO Officer and are given a copy of the EEO Policy. The EEO Officer sends multiple emails to Staff throughout the year.

➤ Intended reach:

All Staff.

➤ Who will be responsible for implementing the action?

EEO Office.

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:

In addition to sending an annual email to all Staff with COIB's EEO Policy, which outlines the EEO complaint process, the EEO Officer will send an annual email to all Staff with the DCAS EEO Complaint Procedural Guidelines and EEO Complaint Process At a Glance.

➤ **Intended reach:**

All Staff.

➤ **Who will be responsible for implementing the action?**

EEO Office.

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:**

COIB will aim for 100% compliance in the annual Sexual Harassment Prevention Training and the biennial Everybody Matters: EEO and Diversity & Inclusion training.

➤ **Intended reach:**

All Staff.

➤ **Who will be responsible for implementing the action?**

EEO Office.

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:**

Based on the results of COIB's 2020 Climate Survey, all managers and supervisors are aware of measures that an employee may take to appropriately report any violations under the EEO policy. The EEO Officer will send an annual reminder to all managers and supervisors.

➤ **Intended reach:**

All managers and supervisors.

➤ **Who will be responsible for implementing the action?**

EEO Officer.

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:**

Based on the results of COIB's 2020 Climate Survey, all managers and supervisors know to whom and where to direct employees who may want to discuss a complaint. The EEO Officer will send an annual reminder to all managers and supervisors.

➤ **Intended reach:**

All managers and supervisors.

➤ **Who will be responsible for implementing the action?**

EEO Officer.