

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

Fiscal Year 2023

Commission on Human Rights

Table of Contents

I. Commitment and Accountability Statement by the Agency Head	3
II. Recognition and Accomplishments	5
III. Workforce Review and Analysis	11
IV. EEO, Diversity, Inclusion, and Equity Initiatives for FY 2023	12
V. Recruitment.....	17
VI. Selection (Hiring and Promotion).....	19
VII. Training.....	22
VIII. Reasonable Accommodation	24
IX. Compliance and Implementation of Requirements Under Executive Orders and Local Laws	25
X. Audits and Corrective Measures	27
XI. Agency Head Signature	28
Appendix A: Contact Information for Agency EEO Personnel.....	29
Appendix B: 2020 Climate Survey Plan.....	30

I. Commitment and Accountability Statement by the Agency Head

The Human Rights Commission (NYCCHR) enforces the New York City Human Rights Law, one of the broadest anti-discrimination laws in the nation. The Commission fosters compliance with the City's internal EEO policy by ensuring that staff, employees, applicants for employment, contractors, consultants, interns, agency partners, and others understand their rights and protections, and that the policy is effectively enforced. The Commission has a venerable history of promoting dignity and equality for all. I have had the honor to deepen the agency's work advancing fundamental rights across the five boroughs since I joined the agency as Chair and Commissioner in October of 2021. As a lifelong New Yorker, I am especially proud of the work we do to put the City's human rights values into practice. Since I began my tenure, our dedicated staff have continued to navigate the economic and social impacts of COVID, while prioritizing efforts to prevent and respond to discrimination and harassment in employment, housing, and public accommodations. Our mandate to foster intergroup relations has a renewed urgency as the City reopens and reckons with disproportionate impact of COVID on Indigenous Peoples, Black, Latinx, and immigrant New Yorkers. The Commission's work enforcing the right to be free from discrimination, harassment, and unfair treatment continues to illuminate how disparities and divisions have fueled mistrust and hate, on the basis of race, color, national origin, religion, sexual orientation, gender identity, and other categories protected by the Human Rights Law. And our efforts remain on prevention: through awareness-raising, by building bridges across communities, through restorative justice, and the implementation of the Human Rights Law's protections. For the Commission, equity, dignity, and non-discrimination remain the cornerstone of our efforts.

I am proud that our staff have risen to the challenges posed by COVID, remote work, and the ongoing divisive politics at the national level. The Commission's diverse staff have supported each other, and developed innovative strategies to implement the Human Rights Law, serving all New Yorkers.

The Commission's team has a wide range of civil rights and human rights experience, and backgrounds, and speak 28 languages other than English. It is through our team's ongoing dedication that we have cultivated ties to community-based organizations, neighborhood and business associations, faith communities, legal services providers, and other stakeholders that are essential to our work to ensure all New Yorkers can thrive. Over the past six years, the Commission expanded staff to include positions responsive to the diverse population and unique needs of our city: a Muslim, Arab, South Asian Communities Lead Advisor; an African Communities Lead Advisor; a Jewish Communities Liaison; an LGBTQI Lead Advisor; a Transgender Communities Lead Advisor; an East Asian Communities Liaison; a Youth Lead Advisor; and a Lead Advisor for Veteran Communities. These roles inform the work that we do every day and complement additional staff expertise and experience on restorative justice, Afro-

Caribbean communities, Sikh communities, Latinx communities, Low wage and domestic workers, disabled persons, and more.

Responding to the diverse needs of New Yorkers through our law enforcement, community relations, and policy work is a key commitment for the year ahead. So is strengthening our efforts to foster inclusion, equity, empathy, and respect for all staff so that all of us are able to show up as our authentic selves and succeed regardless of identity. To this end, I have prioritized bringing staff together for formal and informal wellness and mindfulness activities, creating spaces for engagement, reflection, and relationship building. This includes hosting an outdoor all-staff wellness retreat this summer. I have also worked to meet with leaders and residents from New York's diverse communities, so that our presence is known, and so that we can meet New Yorkers where they are. Our agency has convened virtual and increasingly in-person events, including brown bag lunches with leaders from advocacy organizations.

Diversity, equity, and inclusion are a critical component of all of the Commission's work – external and internal.

COVID hit businesses owned by minorities and women hard and the Commission is doing its part to support M/WBEs in the market where the City conducts its procurements. In compliance with Executive Order 59, the Commission has a Chief Diversity Officer/Chief M/WBE Officer in place to oversee the Commission's M/WBE program and lead our efforts to eliminate discrimination among minority and women owned businesses by ensuring compliance and equitable opportunities within the Commission's procurement process. The Chief Diversity Officer/Chief M/WBE Officer is empowered to facilitate the Commission's meeting of its M/WBE diversity and inclusion goals. The Commission has spent more than 50% of the agency's eligible funds with M/WBE vendors and has earned a coveted "A" grade from the Comptroller in this area five years in a row. Consistent with our M/WBE diversity and inclusion goals, the Commission has created new programming around our Business Outreach and resources to encourage M/WBE vendors to do business with Commission.

During this fiscal year, we have also worked to deepen collaborative partnerships through a number of initiatives to promote inclusion and belonging. As part of the rollout of expanded workplace protections for domestic workers, the Commission embarked on days of visibility in all five boroughs, working closely with home care workers, cleaners, and nannies, and launched a companion multi-lingual campaign on social media, in bus shelters, print media and radio. We launched new Indigenous language PSAs and focused on building partnerships with Native American and Indigenous communities. Earlier this year, we launched a training of the experiences of Jewish New Yorkers and antisemitism. Each of these complement longstanding restorative justice work and a focus on anti-Black racism, which we highlighted in new resources in 2022. Our cases and settlements further continue to reflect a commitment to ensuring the rights of some of the most vulnerable New Yorkers are upheld. We have continued to uphold the Human Rights Law through notable cases to eradicate source of income discrimination in

housing, to ensure equitable opportunities in employment regardless of credit score or conviction history, and to address algorithmic discrimination, among others.

The Commission’s commitment to equity, diversity, and inclusion is consistently shared with staff. All staff are trained on the City’s EEO policies and our EEO team and EEO resources are easily accessible to our decentralized staff. Throughout the pandemic, and the return to the office, the Commission has ensured that the EEO team is committed to providing reasonable accommodations in a timely manner, addressing issues related to staff well-being, and promoting healthy workplace environments where all staff feel valued, included, and respected. All our staff, including applicants who seek to work with the Commission, are protected by the City’s EEO policies. The Commission has robust training practices in EEO matters. All staff, including interns, for example, are required to take EEO, sexual harassment prevention, inclusion, and diversity, and LGBTQI trainings within 30 days of their start date. The baseline required trainings are complemented by additional trainings that the Commission requires all staff to take on issues relevant to our work, such as race and color discrimination, working with people with disabilities, and language access. The Commission holds all staff accountable to their roles in supporting the City’s EEO policy and ensures all staff are evaluated for their compliance with the policies. The dedicated EEO team, working with Acting Chief EEO Officer, JoAnn Kamuf Ward, manage these efforts.

The past year has been one of transitions, and ongoing global and local environmental, social, and political upheaval. While it is easy to despair, I feel inspired. Inspired by the innovative and compassionate Commission staff, and by the committed New Yorkers we collaborate with, and serve, every single day. All of us are New Yorkers who have a vision for a City where human rights – dignity and equality – are a reality for all. Fulfilling that vision is not easy, and it’s not fast. However, I believe that together, we can make the change we want to see in the world. It takes patience, and empathy. And it takes a commitment to learn and grow together. I am honored to be working with you as we take steps to realize that vision. Thank you for all that you do, personally and professionally to make the Commission, and our City, a better place.

This statement is the same as last year.

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

II. Recognition and Accomplishments

During FY 22, the Commission on Human Rights agency accomplished the following as part of our commitment to diversity, equity, and inclusion, and equal employment opportunities:

1. Mandatory and early EEO trainings for new staff

- New staff are required to take the following trainings within 30 days of their start date:
 - Sexual Harassment Prevention

- The Citywide EEO Policy, a four-part module that includes diversity and inclusion training;
- LGBTQ: Power of Inclusion

2. Maintaining a robust and well-staffed EEO team:

- The Commission maintained a robust EEO team in the last Fiscal year. Throughout the pandemic, responding to remote work and then the return to the Office, the EEO team added a member to assist with reasonable accommodation requests. At all times during this reporting period, and prior years, the Commission's EEO team is diverse, and reflects membership from among the Commission's managerial and represented staff, different units, and different office locations.
- The Commission developed a dedicated EEO email address to streamline requests and communications with the EEO office.

3. Comprehensive EEO trainings:

- Building on its practices in prior years, the Commission continues to provide transparency about and refresh knowledge of EEO policies and procedures. The EEO team offered two all staff EEO refreshers in the last Fiscal Year to complement providing easily accessible EEO policies and periodic emails to staff about the EEO team composition and processes for requesting reasonable accommodations, as well as EEO complaint and inquiries and procedures.
- The Commission continues to offer extensive anti-discrimination and cultural competency trainings on a variety of topics including, but not limited to, equal access for people with disabilities, working with transgender people (in compliance with Executive Order 16), and sexual harassment prevention. The interactive, web-based sexual harassment prevention training that the Commission made available to the public in 2019 continues to be a valuable resource for employers across the city, and the Commission is no exception. The Commission has managed, despite the disruptions that have come with the pandemic, to have all its staff complete the training.
- In addition, CCHR also offered staff many CCHR created and DCAS EEO-related trainings, including but not limited to:
 - Human Rights Law and Discrimination Based on Race and Color
 - EEO Awareness
 - Language Access
 - Human Rights Law and Age Discrimination
 - Sexual Harassment in the Workplace
 - LGBTQ: Power of Inclusion (DCAS)
 - Working with Transgender and Gender Non-Conforming Persons
 - Working with People with Disabilities (a/k/a Disability Etiquette)
 - Credit and Criminal History Discrimination in Employment
 - Bystander Intervention

- Understanding Muslim Experiences and Combatting Anti-Muslim Bias
- Understanding Jewish Experiences and Antisemitism (launched in FY 22)

4. Continued to support strengthened recruitment and promotional practices despite fiscal constraints:

Recruitment has been challenging due to a number of factors impacting all city agencies (hiring restrictions, approval processes, private sector work from home policies). Nevertheless, in FY 22, we were able to fill some positions and we have an ongoing focus on recruitment and retention.

The Commission has supported the activities and resources listed below over the past year.

- A Recruitment Committee that includes dedicated staff invested in identifying and improving areas of underutilization and our recruitment outreach.
- An evolving list of affinity groups, career fairs, community-based organizations, graduate and post-graduate universities and programs for recruitment.
- Relationships with groups that represent underrepresented populations to improve recruitment practices, which we continue to build and cultivate
- Circulating our job postings internally and externally, as well as information on internships and employee engagement activities on a website that complies with Local Law 26 to provide for increased accessibility to all visitors, including prospective employees.
- Structured interview questions, informing staff of all open positions within the agency, and encouraging them to apply, and finalizing and distributing tasks and standards.

5. Improving Workplace Environments

- The Commission’s diverse team of individuals who speak a total of 29 languages and are representative of the communities we serve, helps foster and maintain an inclusive and culturally competent environment.
- The EEO team continues to provide the reasonable accommodations required by the City’s EEO policy. Reasonable accommodations may include flexible scheduling, telework, the acquisition of needed technology, equipment, or furniture, or adjustment of job duties. Staff continue to have direct and immediate access to various members of the EEO team who engage in comprehensive cooperative dialogue to address requests.
- In addition, while continuing to comply with Citywide directives, the Commission has explored caregiving accommodations and more formal remote work options by, among other efforts, robustly ensuring that all staff remain aware of all federal, state, and city benefits available to them, including caregiving leaves provided under the City’s leave policy.
- The Commission continues to support staff-led affinity groups. In addition, the Commissioner and Chair, the Chief of Staff, and unit heads, have sent out staff-wide and

departmental communications designed to support staff in coping with the challenging events that have occurred over the last year and a half.

- Building on last year’s reporting, the Commission’s internal Mental Health Working Group, launched in FY 20, continued its work, continuing to host virtual Community Check-In on a weekly basis as well as weekly lunchtime chat spaces for peer to peer meet-ups virtually. This peer-led space allows Commission staff to build camaraderie and create a virtual self-care space.
- This Fiscal Year, the Commission took advantage of funding opportunities from OLR to plan for expanding wellness activities. The agency convened a day long staff outdoor wellness retreat as part of staff appreciation and a commitment to ensuring employees are supported, as well as to foster relationship building, and promote staff wellness.
- Building on lessons learned as part of the return to the office, the Commission continued to develop and integrate workplace environment resources tailored to staff health and safety during the pandemic; access to and information on vaccination rollouts (COVID and MPV); and ensuring staff were connected with EEO staff as needed in dealing with the intersection of these issues with the City’s EEO policy. The agency invested considerable effort and resources to this effort to meet staff needs:
 - In FY 21, the ACRO and GCO created a new intranet resource to serve as a centralized clearinghouse on resources for staff wellbeing that is accessible to staff 24/7 and provides the most up to date City guidance and information on staff resources for mental health support, EEO support, vaccination information, and health and safety guidance. In FY 22, we continued to build out the resources and information:
 - Weekly, consistently attended, all staff virtual open offices for questions relating to health and safety, vaccination, and other workplace issues, alongside “special sessions” when new guidance or information is released by DCAS or other city agencies
 - Ensuring reliable, frequent, direct messaging to all staff through email:
 - Periodic regular reminders of existing workplace resources for vaccinations, self-care, and EEO related issues.
 - Notifications when news or City policies change, pointing staff to new directives or resources as well as reiterating availability of the intranet resource and weekly virtual hours to address questions.
 - The Commission continued to promote information on vaccinations and preventative health measures through employee benefits, NYC DOHMH presentations town halls, e-mail communications, and discussion opportunities.

- Reinvigorating the Agency’s Employee Engagement Committee with a focus on employee engagement, connection, and employee appreciation in the workplace, responding to staffing changes.
- In FY 22, the Commission organized a staff appreciation event in December 2021, as well as a more informal staff gathering in February of 2022. We are currently planning periodic all staff meetings for FY 23.
- The Commission’s Law Enforcement Bureau (LEB) continued to provide ample opportunities for professional development continuing into FY 23. LEB provides mentorship and co-counseling opportunities on complex and novel cases, which helps staff to engage in more teamwork, increase skill-building opportunities, and improves morale.
- LEB agency attorneys are also provided professional development opportunities in the form of CLEs; as well as opportunities to speak on panels and/or present at community and legal events including at the NYC Bar Association, among other venues. The Commission has made a dedicated effort to have LEB attorneys featured in press stories about case resolutions they have successfully negotiated. This elevates the profiles of these attorneys and allows them to publicly claim credit for their hard-earned efforts.
- The Community Relations Bureau (CRB) Deputy Commissioner continues to be responsible for personnel matters such as professional development and training. CRB has continued to invite guest speakers to talk about various topics that benefit staff, from their city benefits to self-care.
 - The Community Relations Bureau staff and Internal Agency LGBTQ working group have also organized Brown Bag lunches with outside speakers on issues ranging from LGBTQIA legal developments, Indigenous Peoples in New York City, Imposter Syndrome in the workplace, among others.
- The Commission’s smaller departments including Information Technology, Operations, Policy, and Communications have also worked on initiatives to improve professional development of staff, whether through paid DCAS trainings, or participation in external trainings and conferences.
- The Commission developed a number of new public facing resources on anti-Black racism. Building on its seminal guidance and rules on hair-based race discrimination, which affirms the rights of its employees and New Yorkers to maintain hair textures and hairstyles affiliated with their racial or ethnic identity without fear of discrimination, the Commission produced a social media video on the relevance of hair protections and created a one pager on human rights law protections for broad public dissemination. The Commission developed and released a new fact sheet on cross-agency efforts to address anti-Black racism, and developed a public-facing, curated anti-Black racism resource list

that was shared with staff on the International Day on the Elimination of All Forms of Racial Discrimination.

- The Commission continues to do exit interviews with departing staff to better respond to and identify workplace issues to improve climate and retention.
- The Commission promotes and provides free language services, including written translations and in-person or telephonic interpretation, to any person requiring assistance.
- For the first half of FY 21 and through FY 22, the Commission continues to develop guidance on discrimination protections in the context of shifting vaccine requirements in employment and public accommodations.

6. Being recognized and honored by community and intergovernmental partners, including:

- In September of 2021, then Commissioner Ana Oliveira – President and CEO of the New York Women’s Foundation – was included in City & State’s “Power of Diversity: Latino 100”, as an influential Latino leader for her efforts to address all forms of discrimination.

III. Workforce Review and Analysis

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

1. Total Headcount: 103

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.

HR gives all new hires the DCAS self-identification form at onboarding; HR also has an evergreen link to the self-identification request and link to ESS and paper form at the top of its main intranet landing page. Finally, HR regularly reminds staff of this by email.

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

Agency Head

Quarterly Semi-Annually Annually Other _____

Human Resources

Quarterly Semi-Annually Annually Other _____

General Counsel

Quarterly Semi-Annually Annually Other _____

Other (___specify)

Quarterly Semi-Annually Annually Other _____

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

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

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

❖ Workforce:

The agency will continue its efforts to ensure a diverse workforce, and focus on strengthening recruitment, retention, promotion, and professional development through efforts that include:

- Improving, tracking, and documenting recruitment and hiring practices.
- Improving promotional opportunities through professional development training programs.
- Building deliberate partnerships with organizations or groups that assist people with disabilities, people with criminal conviction histories, and other under-represented groups with finding employment to continue to improve staff diversity in all areas.
- Ensuring staff involved in hiring are adequately trained on structured interviewing and aligned with agency best practices.
- Ensuring that all vacancies are posted internally and externally to attract the most diverse applicant pool.

❖ Workplace:

CCHR's efforts focused on ensuring a welcoming and inclusive workplace culture, and fostering employee activities will include:

- Prioritizing senior positions for internal advancement and evaluating internal applicants consistently with external applicants by assessing applicants through the tasks and standards associated with a given position and other objective criteria.
- Ensuring EEO team involvement in hiring and promotional processes, including reviewing job postings, offering trainings for department heads, and hiring managers on best practices in recruitment, and sitting in on interviews on an as-needed basis.
- Maintaining and disseminating updated tasks and standards to all staff.
- Conducting annual performance evaluations.
- Conducting EEO managerial performance evaluations.

- Continuing to provide anti-discrimination trainings on a variety of topics including and beyond that required by law, such as “Understanding Muslim Communities and “Discrimination Based on Race and Color.”
- Maintaining an active employee engagement committee and continuing to hold events to empower and appreciate Commission employees. FY 22 events have included Staff Appreciation Events, a wellness retreat, and a December end of year celebration.
- Providing professional mentorship, skill-building, and relationship-building opportunities to increase advancement prospects for underrepresented staff.
- Holding get-togethers to address issues of concern to staff as related to cultural competency, diversity, and inclusion, including film screenings or “lunch and learns”.
- Providing robust EEO support to staff and continuing to offer reasonable accommodations, including caregiving accommodations, by way of flex scheduling, technology, location changes, increased breaks, and the option to work remotely.
- Continuing practices in each department for management to hold regular meetings and check-ins with non-management staff to promote development and address issues that arise.
- The Commission will continue inviting guest speakers to address not just human rights issues but also wellness related topics (e.g.: mindfulness and meditation).

❖ **Community:**

CCHR is committed to the values of equity and inclusion, and all of our work seeks to strengthen compliance with the City’s Human Rights Law throughout New York City. Our external initiatives in FY 23 will include:

- Ensuring that Commission services and resources are accessible to all of New York’s diverse populations by building on our robust program of community education and outreach work promoting diversity and inclusion and continuing to provide monthly workshops to the public in each of the five boroughs.
- Actively engage M/WBE vendors by coordinating agency sponsored events, collaborating with, and participating in events with sister agencies and developing programming with the Community Relations Bureau to further engage the business community.
- Continuing to prioritize and center diversity and inclusion in how the Commission is represented to the public, including inclusive photos, content that highlights diverse communities, and working with minority and women-owned businesses for communications and other initiatives.
- Continuing to engage in interfaith and faith-based events, and building relationships with interagency partners, community-based organizations, and the business community.
- Continuing to increase our capacity to engage in pre-complaint interventions to better serve and respond to the needs of the public.

- Continuing to utilize hearings and workshops as a strategy for building awareness of human rights protections and obligations and fostering appreciation for diversity.
- Continuing to issue legal guidance and publish rules to reinforce and interpret protections available under the NYCHRL.
- Continuing to be a leader in embracing intersectional celebrations and raising cultural competency, through programming such as our “LGBTQ Iftar in the City” and investing in ongoing relationships with communities acutely vulnerable to discrimination including the Sikh community by way of an annual Vaisakhi celebration event.
- CCHR will continue to make every effort to make its services accessible to all New Yorkers.
- Partnering with City agencies to provide “Understanding Muslim Communities” trainings in follow-up to our recommendations from our Survey Report on Muslim, Arab, South Asian, Jewish, and Sikh New Yorkers.
- Expanding Bias Based Intervention and Prevention as needed to address and proactively combat public incidents of bias, hate, and discrimination.
- In FY 21, the agency released a Land Acknowledgment, and we will be continuing to build relationships with Native American and Indigenous Peoples in New York.

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

- Addressing racial discrimination through innovative, community-centered approaches, including holding community forums following public incidents that may aggravate inter-community tensions.
- Investigating and resolving complaints of discrimination and continuing to conciliate or litigate cases that may have a high impact on New York City and our efforts to curb unlawful discrimination.
- Internal and external (social media) messaging around days and months that celebrate diversity and inclusion (Hispanic Heritage Month; Juneteenth; and Disability in Employment).
- Senior Leadership and CCHR staff participate in a wide range of public facing events with DCAS and other agencies, which in FY 22 included events such as “Building an Age Inclusive NYC”; “Black History Month Conversation: Discrimination in the Military and Human Rights.”
- In FY 22, CCHR’s Racial and Restorative Justice Specialist led circle keeping training for all staff and continued to convene an active internal Restorative Justice working group.

2. Planned Programs, Initiatives, Actions

A. Workforce

The Commission is proud to be comprised of a workforce that is diverse in terms of identities, professions, training, and lived experience. We are committed to take action to recruit and retain staff that reflect the diversity and richness of New York City.

As a preliminary matter and as noted in prior EEO reports, CCHR's dashboard includes underutilization of females and Black individuals in the social work category. Utilization analysis looks to assess whether the City's workforce is representative of those people who could be in its workforce. The most critical part of a utilization study is an availability analysis. An estimate is the number of people in various race/ethnic and gender categories who are available for employment in each job group, expressed as a percentage of all qualified persons available for employment in the job group. The analysis compares current workforce composition to availability estimates and determines imbalances (under/over – utilization). Due to the Civil Service Availability used by Department of Citywide Administrative Services (DCAS), derived from the certified eligibility lists using the Social Worker title, CCHR believes the analysis is flawed (as repeatedly articulated to DCAS). This is evidenced by CCHR only possessing six out of one hundred thirty-four titles – four of which are specific to the agency.

Regardless, the Commission will address underutilization and seek to ensure that historically underrepresented communities are able to join our team. Specific initiatives that the Commission will undertake include deepening the applicant pools for posted positions through broader outreach; encouraging applications for civil service exams and reviewing quarterly workforce data to inform recruitment. The Commission will also seek to address forthcoming retirement or gaps in talent through succession planning and creating pipelines for growth and advancement of current staff. A focus on developing the skills and capacity of current staff will include fostering coaching and mentoring and ensuring professional development programs and opportunities are available for staff, as well as placing a focus on staff wellbeing and mental health. As noted below, the agency will also take steps to ensure pay and promotions are equitable.

B. Workplace

As noted in the opening annual statement, the Commission continues to prioritize an inclusive workplace, and to create spaces to discuss and address barriers to equity and initiatives that can strengthen workplace culture and foster dialogue and action related to improving racial justice at the agency and in the communities where we work. Some examples of initiatives that we employ include prioritizing inclusive language (related to sexual orientation, gender and gender identity, age). As noted elsewhere in this report, the agency honors a wide array of heritage months and days that are recognized locally as well as globally. We also have an employee engagement group that is focused on bringing staff together to build relationships across units and offices, and formal and informal staff checks in as a place to reflect and share experience.

The Commission will continue to implement exit interviews with departing staff to better respond to and identify workplace issues to improve climate and retention. The Commission has also continued initiatives based on the results of the DCAS Climate Survey, including developing a Welcome to CCHR orientation presentation, and e-mails which provide information about Commission departments, EEO team contact information, and EEO policies to staff as part of onboarding. Additionally, the agency will:

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

List below the names of existing ERGs:

1. Employee Engagement
2. LGBTQI Affinity
3. Restorative Justice Working Group

In In FY 23, the Commission will continue to encourage and support staff who wish to add to these groups.

- 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

Throughout the year, the Community Relations Bureau and the Communications team are focused on expanding knowledge about the Commission and building relationships with external partners. This includes Human Rights Law trainings, which happen multi times a week; resource fairs; business corridor outreach; participation in and organization of roundtables; and targeted campaigns in community and ethnic media. Agency attorneys and social workers also participate in professional programming regularly, for example, Continuing Legal Education trainings with Bar Associations. The Community Relations Bureaus' human rights specialists, lead advisors, and liaisons, spend a significant amount of time in the field building and strengthening collaborations that inform the agency's work, some of which are noted throughout this plan.

The Commission's Chief Diversity Officer/Chief M/WBE Officer oversees the agency's M/WBE program. Reporting directly to the Commissioner, she is empowered to facilitate the Commission's meeting of its M/WBE, diversity and inclusion goals. In this area, the Commission has led and spent more than 50% of the agency's eligible funds with M/WBE vendors for several years running. The Commission's Chief Diversity Officer led a virtual procurement fair specifically for M/WBE vendors to help vendors take full advantage of their certification and continues to create programming around the Commission's Business Outreach program to encourage M/WBE vendors to do business with Commission.

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)
- Consider the Options for customer satisfaction surveys
- Expand language services for the public

V. Recruitment

A. Recruitment Efforts

In addition to the detailed efforts described throughout this report, the Commission will proactively focus on sharing posted positions and will continue to refine and expand targeted outreach and recruitment, focus on addressing underutilization, ensure that posting include language related to diversity, inclusion, and equal opportunity, and share vacancies with other agencies and offices as appropriate. In this vein, the agency has explored the Silver Stars program and the Urban Fellows program, among other programs aimed to enhance outreach and develop well-rounded and diverse staff. The Commission will continue to post all new positions and encourage hiring managers and staff to be well-versed in structured interviewing, unconscious bias, as well as to build diverse interview panels. These efforts will be supported by Recruitment Strategist that works within the EEO team to improve its recruitment.

B. Recruitment Sources

1. The Community Relations Bureau sends out consistent reminder to staff members to contact the Recruitment Strategist when attending Career and Job Fairs citywide, and the Recruitment Strategist sends out job openings to agency staff. These efforts have generated interest in the agency's work and led to hiring of interns, among others.
2. Sharing current posting with Community-Based organizations and academic institutions in the five boroughs. Through these efforts, individuals have reached out and requested informational interviews. In addition, more diverse organizations representing individuals from all walks of life have become familiar with the Commission's work. This also helps us to educate more New Yorkers about the NYCHRL.
3. Sharing our job postings on social media, our website, listservs, via LinkedIn and NYC.gov. This is our primary recruitment source and has led to a wide array of qualified candidates being interviewed, as well as hiring.
4. The agency's Human Resources Director and executive staff send out current job openings as well. Staff members are able to share the job openings with their contacts and other networks they may have. We have yielded results by way of postings being shared through current staff's external networks.
5. Participation in law school recruitment and annual hiring events. This has led to diverse classes of legal interns, often during the summers and semester externships as well.

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	12	11 Unknown, 1 White	M __ F_1_ Non-Binary __ Other __ Unknown 11
4. Summer Graduate Interns	20	10 Unknown, 4 Asian, 1 Black, 5 White	M _1_ F_8_ Non-Binary _1_ Other __ Unknown 10
5. Other (specify):	1	Black	M __ F_X_ Non-Binary __ Other __ Unknown __

In the upcoming year, the Commission will continue to develop pipelines of candidates from underutilized groups through internships and fellowships. CCHR has a track record of hiring former interns and fellows and will work with other agencies and community partners to identify candidates and advertise opportunities.

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 ___0_ [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] ___N/A___.

As noted in prior reports, non-competitive titles are not eligible for 55-a, but CCHR is committed to use 55-a when appropriate and to participate in programs and activities that attract 55-a program applicants and support eligible candidates in the application process. CCHR will educate hiring managers on the program and its benefits and will further share job posting with ACCES-VR and NYC: ATWORK, and will ensure the language, “This position is open to qualified persons with disability who are eligible for the 55-a Program” is on all the agency’s competitive job postings.

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)

A. Career Counselors

CCHR prioritizes equity and inclusion in hiring and promotions, and we are consistently reviewing our job postings, advertising, and selection processes. In the upcoming year, the Career Counselor will continue

to review the agency's approach to hiring, work with the EEO team to promote awareness of opportunities for promotion and transfer internally and at sibling agencies.

The EEO team also has a recruitment strategist that works with HR, the EEO Officer, and other staff to share information on positions and to identify avenues to reach new candidates that reflect the diversity of New York City. Together with the Director of Training and compliance, the Career counselor will also seek to support and encourage staff engagement in training and development programs, including; sharing information with staff on professional development trainings, explaining the civil service process to CCHR employees, and providing assistance to apply for exams, sharing exam notices, and offering support in planning for career paths and professional growth in the long term.

B. New Hires and Promotions

CCHR will continue to review and refine criteria for candidate selection, particularly for mid and high-level positions, as well as make announcements public and share job postings with underrepresented groups, and collaboration with the Mayor's Office of Appointments when appropriate to identify a diverse talent pool. Consistent with the EEO mandate, CCHR will review and analyze demographic information on hiring and promotions to promote equity. The agency employs structured interviewing and will continue to train hiring managers on structured interviewing. Interview questions are vetted by the EEO Officer, and we strive to ensure that interview panels are diverse. Where CCHR identifies barriers to diversity in applicants or top candidates for positions, the agency will work with the EEO team to improve outreach and review candidates and address any barriers or limitations in the process. CCHR will also work with DCAS on civil service exams, ensuring there is a diverse group of subject matter experts involved, and that job related criteria inform who is included, as well as what is being tested for. The Commission recognizes that hiring and promotion strategies and techniques are one of many to address issues and challenges related to improving diversity and inclusion in the workplace, and their effectiveness should be addressed on a case-by-case basis.

C. EEO Role in Hiring and Selection Process

In addition to the above, 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.)	New staff: within 30 days of start date. Current staff: every two years	Ongoing
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.)	Same as above	Same as above
3. Sexual Harassment Prevention (e-learning)	All employees – Annually (Cycle 5 runs between September 1, 2022 – August 31, 2023)	New staff: within 30 days of start date. All staff: annually	Same as above; and 100% compliant for each of DCAS's training cycles.
4. Sexual Harassment Prevention (classroom/live webinar)	All employees – Annually (Cycle 5 runs between September 1, 2022 – August 31, 2023)	Same as above	Same as above
5. lgbTq – Power of Inclusion (e-learning)	Managers, Supervisors, and Front-line employees All other employees	New staff: within 30 days of start date. Current staff: every two years	CCHR: to be completed every 2 years

6. IgbTq – Power of Inclusion (classroom/live webinar)	Managers, Supervisors, and Front-line employees All other employees	Same as above	Same as above
7. Disability Awareness and Etiquette	All staff	Every 2 years	Ongoing. Facilitated by MOPD, to be completed every two years
8. Structured Interviewing and Unconscious Bias (classroom/live webinar)	Hiring Managers, EEO team members	10-20 staff	As per DCAS schedule
9. Working with Transgender and Gender Non-Conforming Persons (live or virtual)	All staff	New staff: Within 30 days of start All staff: every 2 years	CCHR: to be completed every 2 years
10. Structured Interviewing and Unconscious Bias (classroom/live webinar)	Hiring Managers	15-25	DCAS as needed
11. HRL and Anti-Black Racism and Other Forms of Discrimination Based on Race and Color	All staff	All staff	CCHR to be completed every two years
12. Understanding Muslim Experiences	All staff		
13. Language Access	All staff	All staff	Annually
14. Conflict of Interest	All staff	All Staff	Ongoing. Facilitated by COIB
15. HRL and Discrimination in Housing	CRB staff	CRB staff	One year from start date

16. HRL, Credit Discrimination, and Criminal History Discrimination in Employment	CRB staff	CRB staff	One year from start date
---	-----------	-----------	--------------------------

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:

An employee who would like to request an accommodation may approach their supervisor or an EEO team member in person, via phone, or via a dedicated EEO email. In most instances, the requestor will be asked to complete a reasonable accommodation request form. The EEO team member will ask clarifying questions if needed, confirm what the request is, and discuss with the employee's supervisor. Additional documentation or information will be obtained if needed. Once the accommodation is approved, a granting form will be written and signed by the Chief EEO Officer. The original will be retained and a copy will be sent to the employee. Other steps may need to be taken depending on the accommodation, such as alerting Human Resources of a CityTime adjustment, or reaching out to Information Technology or Operations to obtain special equipment or software for the employee. The EEO team maintains tracks all accommodation requests, and maintains records, including copies of the granting forms and communications between employees regarding requests.

- 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

- 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.

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.

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 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 [template included in the appendix] 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 EEPCC or another governmental agency specific to our EEO practices.
- The agency is currently being audited or preparing responses to an audit conducted by the EEPCC or _____ [another governmental agency – please specify] specific to our EEO practices. Upon forwarding our responses to the recommendations issued by the EEPCC, the agency will submit to OCEI an amendment letter, which shall amend the agency plan for FY 2023 to include and implement EEPCC recommendations that will be implemented during the fiscal year.
- The agency is subject to any other oversight or review by a federal, state or city civil rights agency [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 EEPCC 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.]

Annabel Palua

Print Name of Agency Head



Signature of Agency Head

11. 16. 2022

Date

Appendix A: Contact Information for Agency EEO Personnel

	Title/Function	Name	Email	Telephone
1.	Agency Acting EEO Officer	JoAnn Kamuf Ward	JKamufWard@cchr.nyc.gov	212-416-0255
2.	Agency Acting Deputy EEO Officer	Mariela Salazar	MSalazar@cchr.nyc.gov	212-416-0233
3.	Agency (Chief) Diversity & Inclusion Officer/Recruitment Strategist	Christelle Onwu	COonwu@cchr.nyc.gov	646 988-2602
4.	Chief Diversity Officer/Chief MWBE Officer per E.O. 59	Sheshe Segar	SSegar@cchr.nyc.gov	347-607-7644
5.	ADA Coordinator	Anna Martinez	AMartinez@cchr.nyc.gov	646-629-1268
6.	Disability Rights Coordinator	Anna Martinez	AMartinez@cchr.nyc.gov	646-629-1268
7.	Disability Services Facilitator	Anna Martinez	AMartinez@cchr.nyc.gov	646-629-1268
8.	55-a Coordinator	Taiwo Onabanjo	Tonabanjo@cchr.nyc.gov	929-354-5447
9.	EEO Investigator(s)			
10.	Career Counselor(s)	Taiwo Onabanjo	Tonabanjo@cchr.nyc.gov	929-354-5447
11.	EEO Training Liaison(s)	Vanessa Ramos	VRamos@cchr.nyc.gov	347-601-7445
12.	EEO Counselor/Officer	Alphonso Chris Smith	AOSmith@cchr.nyc.gov	718-657-1097
13.	Accommodations Officer	Nico Escobar	NEscobar@cchr.nyc.gov	646-430-3144

Appendix B: 2020 Climate Survey Action Plan

Members of the EEO team reviewed the 2020 Climate survey results with the General Counsel. In response to the climate survey, the Commission has continued with previously implemented measures, and the initiatives below.

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

➤ Planned actions, initiatives, programs, or policies:

- The Agency Head and GC will circulate periodic agency wide email including EEO resources, including the revised EEO Policy.
- The revised EEO policy and materials on reasonable accommodations and complaints are on the agency intranet
- Periodic live EEO refresher sessions
- GC open office hours

Intended reach: All staff, interns, and consultants

➤ Who will be responsible for implementing the action?

- Acting Chief EEO Officer, General Counsel, HR, and the Agency Head

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

➤ Planned actions, initiatives, programs, or policies:

- EEO refresher sessions, including EEO team members
- Periodic all staff emails naming team members and circulating relevant resources
- Periodic EEO team meetings and planning for staff engagement events

➤ Intended reach: All staff, interns, and consultants

➤ Who will be responsible for implementing the action? Acting EEO Officer, EEO Team, Agency Head

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: *See 1 and 2 above*

➤ **Intended reach** *See 1 and 2 above*

➤ **Who will be responsible for implementing the action?** Acting Chief EEO Officer, EEO Team, General Counsel, HR, and the Agency Head

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:**

- Sexual Harassment Prevention (SHP) training is completed within thirty days of start date for new hires and offered periodically.
- CCHR's website hosts a sexual harassment training and multiple materials
- Protections related to gender-based harassment are included in staff trainings and discussions.

➤ **Intended reach:** All staff, including in central office and borough offices.

➤ **Who will be responsible for implementing the action?** EEO training Liaison and General Counsel

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:** *See 1, 2, and 3 above*

➤ **Intended reach:** *See 1, 2, and 3 above*

➤ **Who will be responsible for implementing the action?** *See 1, 2, and 3 above*

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:**

- Training is required for new staff within 30 days, and all staff on a periodic basis. CCHR provides multiple training reminders and opportunities for managers and supervisors.
- Reminders of duties and obligations are made in writing and in meetings, as well as part of the discussions of the Human Rights Law protections.

➤ **Intended reach:** Supervisors and managers in central and borough offices.

➤ **Who will be responsible for implementing the action?** Acting Chief EEO Officer, EEO Training Liaison, General Counsel, and HR.