

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

**Fiscal Year 2025**

**Department of Small Business Services**



careers  
businesses  
neighborhoods

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## I. Annual Commitment, Accountability, and EEO Statement (EEO Policy Statement).

This statement provides the Agency Head with an opportunity to articulate, in their own language, the agency's commitment to the values of diversity, equity, and inclusion (DEI), and equal employment opportunity (EEO). It should proclaim the assurance of a discrimination-free workplace, integration of this plan into the agency's strategic mission, and a declaration that all senior executives, managers, supervisors, and employees are accountable for upholding these values and are charged, within their scope of responsibility, to effectively implement the agency's DEI-EEO Plan. It must include the name and contact information of agency EEO Officer.

The diversity of New York City is a defining feature and an enormous strength. The resources of City government are structured to meet the needs of New Yorkers of all identities, serving the young and the old, those who have been New Yorkers for generations and others newly arrived, people of every race, language, faith tradition, gender expression and sexual orientation, disability and ability, further shaped by the life experiences and characteristics that distinguish human beings.

The staff of the Department of Small Business Services (SBS) encounter diversity as we work to accomplish our mission by delivering services to entrepreneurs and business owners, jobseekers and employers, government vendors and neighborhood organizations. It is an asset that our team reflects the diversity of the New Yorkers we help every day. Ensuring equal employment opportunity and a discrimination-free workplace, where "SBSers" are empowered to bring their full selves to the performance of our public mission, is critical to our operations and our effectiveness.

All SBS senior executives, managers, supervisors, and employees are accountable for upholding these values and providing equal employment opportunities within their scopes of responsibility. In partnership with our agency's Director of Equal Employment Opportunity (Angelita McDonald, [amcdonald@sbs.nyc.gov](mailto:amcdonald@sbs.nyc.gov)), we do and will continue to embrace diversity, equity, and inclusion, to unlock the full potential of our agency and positively impact the lives of workers, small business owners, and neighborhoods throughout the five boroughs.

**NOTE:** If this statement has been in use for more than two years the Agency Head should issue a revised statement.

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

## II. Recognition and Accomplishments

[Describe below key initiatives and accomplishments that your agency undertook last fiscal year (2024) to advance DEI and EEO goals, for example, recognizing employee contributions to DEI goals through awards and employee appraisal, introducing new equity programs, training all staff on mandatory training, or launching employee resource groups. If some of the accomplishments

listed below are a continuation of what was included in previous Annual plans, you will need to provide a statement on how it has changed and/or developed in the past year.

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

1. Establish and distributed Longevity Awards to recognize staff with long standing tenure in City Service
2. Established Employee appraisal procedures.
3. Distributed SBS Pins to all staff in recognition of their service
4. Recognized employee contributions during Quarterly Division meetings
5. Sent diversity event e-blasts.
6. Hispanic Heritage Month Potluck organized by Latino American Small Business Task Force.
7. Held summer gathering for all staff.
8. Senior staff meeting share outs.
9. Press secretary sends weekly email to all staff with press clips and staff recognitions.
10. Commissioner weekly emails to all staff on key announcements, feedback, weekly survey.
11. Introduction of Excellence Awards (2025).
12. Small Business Expo and Procurement Fair staff training.
13. Maintained and expanded pre-vetted interview questions library.
14. Disability etiquette awareness emails (HR) to invite staff.
15. Expanded cross divisional lines of communication on MS Teams to recognize good work and hobbies.
16. Developed and posted a gratitude wall to offer SBS staff a chance to show what they are grateful for DCAS City Talks.
17. HR Trainings:
  - a. New hire “meet and greets” with the Commissioner.
  - b. Orientations
  - c. Monthly new hire announcements shared with all staff.

### III. Workforce Review and Analysis

**Please provide the total agency headcount as of 6/30/2024**

**Total Headcount:** \_\_\_\_\_**289**\_\_\_\_\_

[This figure is available on the total line for your agency in the FY 2024 Q4 EBEP210 CEEDS report]

[Pursuant to Local Law 27 (2023), provide an analysis of your agency’s compensation data and measures to address pay disparity and occupational segregation in FY 2024.

The term “occupational segregation” means a group’s under-representation or over-representation in certain jobs or fields of work, when such group is protected by the employment

related provisions of the city's human rights law and such group does not benefit from greater pay, responsibility, flexibility, stability, prestige, or other indicators of job desirability.

1. [While DCAS will engage an external vendor to conduct a pay equity analysis of the city government workforce, agencies must conduct their own analysis of compensation practices and measures to address pay disparity and occupational segregation regarding the various titles they use.
  - Describe your agency's analysis of compensation data, including conformity with collective bargaining agreements and Mayor's Personnel Orders (MPO).
  - Also describe possible indicators of occupational segregation such as significant over- or under-utilization of certain ethnic or gender categories in major Job Groups.
  - If such analysis was conducted in previous years, describe actions undertaken to reduce occupational segregation.]

In addition to reviewing reports with EEO each quarter to identify trends and opportunities related to under- or over-utilization, SBS continuously monitors compensation data. Each job offer made to a new hire is reviewed to ensure it aligns with the pay of other employees in the same job title within the division and across the agency. Regular reviews and multiple-level checks are also conducted to ensure that collective bargaining agreements and Mayor's Personnel Orders are applied accurately.

In reviewing the agency's current salary data, less than 25% of employees earn less than \$70,000 annually. Of this group, approximately 95% earn over \$55,000, with most expected to surpass \$70,000 within the next 1-2 years due to collective bargaining increases. The remaining 5% consist of intern-level positions, which have set pay rates established by collective bargaining agreements.

2. [Describe steps taken to encourage all employees at your agency to update self-ID information regarding race/ethnicity, gender, and veteran status through either NYCAPS Employee Self Service (ESS) or other means.]

In FY 2025, 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 2025, the agency will inform and remind employees of the option to add preferred name in ESS.

Below please provide the number of employees in your agency whose demographic information is unknown (these numbers are available on the total line of CEEDS report EBEPR210).

Unknown Race/Ethnicity   2   Unknown Gender   9   Unknown Both   11  

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

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

[Select the options that apply to your agency.]

**Agency Head**

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

**Human Resources**

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

**General Counsel**

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

**Other (Deputy Commissioner)**

- 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 2025**

[State below the goals of your strategy for FY 2025 and programs focused on promoting equity, increasing diversity, assuring equal employment opportunity, and enhancing the value of inclusion at your agency. Categorize your goals according to the strategic area targeted.]

## **A. WORKFORCE**

**State your Agency's general goals and strategies to enhance DEI and EEO aimed to enhance your agency workforce.**

[Workforce goals should be directed at the composition of your workforce, recruitment, retention, promotion, and professional development.]

To support SBS's mission, the general goals will emphasize creating a more diverse and inclusive workforce through targeted strategies for recruitment, retention, promotion, and professional development.

**1. Workforce Composition:** We aim to ensure a diverse workforce that reflects the community we serve by focusing on inclusive hiring practices and addressing areas of underrepresentation within our agency.

**2. Recruitment:** SBS will enhance our recruitment strategies by partnering with diverse organizations, using inclusive job descriptions, and targeting a wide range of candidates, ensuring equitable access to opportunities.

**3. Retention:** To retain a diverse talent pool, we will foster a supportive and inclusive workplace culture through mentorship programs, employee resource groups, and regular DEI training.

**4. Promotion:** SBS is committed to providing equal access to career advancement opportunities and ensuring that promotions are based on merit and accessible to all employees regardless of background.

**5. Professional Development:** Our agency will offer continuous learning and development opportunities that prioritize DEI awareness, leadership skills, and career growth for all employees, ensuring everyone has the tools and resources to thrive.

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

### **Planned Programs, Initiatives, Actions aimed at Workforce:**

[Describe how your agency will address underutilization in FY 2025. Please mention here major job groups experiencing underutilization of women and minorities in your agency, and how your agency plans to address the underutilization. This should also include details of how the quarterly reports and dashboards will be used, partnership with the human resources office, initiatives around targeted recruitment, professional development for existing employees, and focus on civil service exams.]

[Also describe special initiatives to enhance equity, inclusion, and race relations in your agency programs and activities. Pay attention to age inclusivity, non-traditional minorities inclusion initiatives, engagement of traditional and older employees in inclusion efforts and discussion forums.]

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

**More Specific Actions and Initiatives:**

- **Diversity Recruitment Campaigns:** Launch targeted outreach initiatives and create partnerships with organizations that support underrepresented groups.
- **Inclusive Hiring Practices:** Review and update recruitment processes to eliminate biases and ensure fair candidate evaluations.
- **Mentorship and Sponsorship Programs:** Establish mentorship initiatives that support the professional growth of employees from diverse backgrounds, focusing on leadership development.
- **DEI Training for Managers:** Provide ongoing DEI and unconscious bias training for hiring managers and supervisors to ensure fair decision-making at every stage of the employee lifecycle.
- **Employee Resource Groups (ERGs):** Support the creation of ERGs to provide employees with a sense of community and opportunities for professional networking and advocacy.

These actions will work together to ensure that SBS' workforce is diverse and empowered to grow, thrive, and lead within New York City.

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

**B. WORKPLACE**

**State your Agency's general goals and strategies to enhance DEI and EEO aimed to enhance your agency workplace and cultural environment.**

[Workplace goals have to do with inclusion, workplace culture, and employee activities.]

**1. Promote Diverse Hiring Practices**

Implement and sustain recruitment strategies that ensure a diverse pool of candidates for all positions. This includes partnering with organizations that support underrepresented communities, using inclusive language in job descriptions, and providing DEI training for hiring managers.

**2. Foster an Inclusive Workplace Culture**

Create an environment where employees of all backgrounds feel valued, respected, and supported. This includes facilitating regular DEI workshops, promoting open dialogues, and celebrating cultural diversity through events and activities that highlight different backgrounds.



3. **Increase Employee Resource Groups (ERGs) Engagement**  
Establish and support Employee Resource Groups that represent various identities, including race, gender, disability, and sexual orientation, to give employees a platform for connection, mentorship, and advocacy within the agency.
4. **Implement Bias Mitigation Training**  
Provide comprehensive training on unconscious bias, microaggressions, and inclusive leadership to all employees to raise awareness and ensure fair treatment in everyday workplace interactions, decision-making, and performance evaluations.
5. **Ensure Equal Career Advancement Opportunities**  
Ensure that all employees, regardless of background, have equal access to career development programs, mentorship opportunities, and leadership training. Regularly assess promotion criteria to ensure fairness and transparency.
6. **Improve Accessibility for Employees with Disabilities**  
Review and enhance workplace accommodations to ensure accessibility for employees with disabilities. This includes ensuring physical accessibility, providing necessary technology support, and offering flexible work options to meet diverse needs.

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

**Planned Programs, Initiatives, Actions aimed at Workplace:**

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

[Also describe special initiatives to enhance equity, inclusion, and race relations in your agency programs and activities. Pay attention to age inclusivity, non-traditional minorities inclusion initiatives, engagement of traditional and older employees in inclusion efforts and discussion forums.]

1. Establish a pipeline for increased hires through CUNY, HBCUs, Hispanic Serving Institutions, and other institutions that serve a diverse student body.
2. Celebrate Heritage Months
3. SBS Insiders - Employee Development (Minority and Female leaders)
4. Hosted Pride Movie Screening "We Came to Sweat"
5. Implemented accessibility features on Powerpoint presentations following color contrast guidelines.

6. SBS launched virtual remote interpretation services as part of the work SBS does to ensure language access is available to all customers (per LL 30).
7. SBS Inclusion Diversity Equity Access (IDEA) council developing DEI Resource guide to be published online.
8. Promotion of Gender Based Violence Awareness Month.
9. Planning of SBS summer all staff to share city resources.

[Please select below the options that apply to your agency.]

- Promote employee involvement by supporting Employee Resource Groups (ERGs). List below the names of existing ERGs:

1. Informal ERGs:
  - a. SBS Pets
  - b. SBS Chefs + Foodies
  - c. SBS Young Professionals
2. IDEA Council is preparing a toolkit for anyone interested in creating an ERG.

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 and EQUITY, INCLUSION and RACE RELATIONS**

**State your Agency’s general goals and strategies to enhance DEI and EEO in areas of Community and Race Relations.**

[Community goals should be directed at the external environment of your agency, that is the public, communities, organizations, and other entities served by your agency.]

1. Conducted the annual M/WBE Procurement Fair
2. Partnered with CUNY for a disparity study on procurement (promoted over email)
3. The Commissioner and senior SBS leadership attended Mayoral ethnic group roundtables.
4. Undertook Jobs NYC initiative & hosts monthly hiring halls in zip codes with highest rates of unemployment.

5. SBS drives traffic to NYC Business Solutions Centers by deploying outreach, canvassing, and partnering with local community leaders.
6. Distributed grants to local economic development organizations
7. Conducted first-ever Small Business Month Expo
8. Conducted outreach in support of Gun Violence Prevention
9. Planned LASBTF and AAPI Taskforce meetings.
10. Workforce1 Career Center has served over 1,000 New Yorkers to help connect to good jobs.

**Planned Programs, Initiatives, Actions aimed at Community, Equity and Race Relations:**

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

[Also describe special initiatives to enhance equity, inclusion, and race relations in your agency programs and activities. Pay attention to age inclusivity, non-traditional minorities inclusion initiatives, engagement of traditional and older employees in inclusion efforts and discussion forums.]

[Please select below the options that apply to your agency.]

In FY 2025, 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).
- Expand language services for the public.

## V. Recruitment

### A. Recruitment Efforts

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

NOTE: This section must be prepared jointly by Agency DEI-EEO and HR.

SBS is committed to building and retaining a diverse and inclusive workforce by implementing proactive recruitment strategies and practices. To promote discretionary positions, we will leverage targeted outreach to underrepresented groups, (if identified in our CEEDS reports); ensuring that our recruitment materials and efforts are inclusive and reach a broad range of candidates. We will utilize workforce summary underutilization reports to identify gaps in representation and inform our recruitment efforts, allowing us to focus on areas where diversity is lacking.

Additionally, we will conduct a thorough review of our current recruitment policies, procedures, and practices to ensure they are aligned with our DEI goals. This will include revising hiring guidelines to remove potential biases and creating a more inclusive process for all candidates. We will also invest in ongoing DEI training for hiring managers and recruiters, equipping them with the knowledge and skills needed to assess candidates fairly and inclusively.

This collaborative effort between the Agency DEI-EEO team and HR will ensure that our recruitment practices foster an environment of equal opportunity and support the long-term goal of a diverse and inclusive workforce.

## B. Recruitment for Civil Service Exams

[Summary of recruitment efforts that will be undertaken in FY 2025 to promote open competitive and promotion civil service exams.]

**JobsNYC:** SBS will continue to attend JobsNYC fairs within the five boroughs to promote workforce services and SBS job opportunities.

List any planned recruitment events for FY 2025 that will be held by the agency to promote open-competitive civil service examinations. [This list should be updated in your quarterly reports]

Event Date	Event Name	Borough
N/A	n/a	

List planned expenditures for FY 2025 related to recruiting candidates for open-competitive and promotion civil service exams.

Borough	Approximate Dollar Amount (\$)
Bronx	N/A
Brooklyn	N/A

Manhattan	N/A
Queens	N/A
Staten Island	N/A
Other (include online)	N/A

### C. Recruitment Sources

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

1. **JobNYC Newsletter** – SBS uses this newsletter to advertise to diverse job applicants that subscribe to DCAS’ JobsNYC newsletter. The newsletter has over 200,000 subscribers, mostly job seekers who do not work for City government.
2. **JobsNYC Hiring Halls** – SBS advertises job opportunities throughout the 5 boroughs that bring public and private job opportunities and career services to economically-disadvantaged communities monthly. SBS successfully hired over 30 employees from the hiring halls offered last year.
3. Indeed
4. LinkedIn
5. Other Social Media postings
- 6.

### D. Internships/Fellowships

[Indicate the type of internship/fellowship opportunities available at your agency. Please provide the number of student interns/fellows employed in FY 2024 and their demographic profiles, based on self-ID data. Indicate your plans to provide internship/fellowship opportunities in FY 2025. What are the sources you plan to draw upon in recruiting and hiring interns? Are you providing opportunities for interns to advance to entry-level positions in your agency? Did the agency hire interns in the past? Explain the reason if your agency does not offer internship /fellowship opportunities.]

The agency provided the following internship opportunities in FY 2024:

Type of Internship\Fellowship	Total	Race/Ethnicity *[#s] * Use self-ID data	Gender * [#s] * Use self-ID data
1. Urban Fellows	5	N/A	M __ F__ Non-Binary __ Other __ Unknown __
2. Public Service Corps	0	N/A	M __ F__ Non-Binary __ Other __ Unknown __
3. Summer College Interns	0	N/A	M __ F__ Non-Binary __ Other __ Unknown __
4. Summer Graduate Interns	0	N/A	M __ F__ Non-Binary __ Other __ Unknown __
5. Civil Service Pathways Fellows	2	N/A	M __ F__ Non-Binary __ Other __ Unknown
6. Other (specify): College Aides	3	N/A	M __ F__ Non-Binary __ Other __ Unknown __
7. Summer Youth Employment	21	N/A	M __ F__ Non-Binary __ Other __ Unknown __
Other internships through college programs (Stanford in NY, CCNY, etc.)	7	N/A	M __ F__ Non-Binary __ Other __ Unknown __

### E. 55-a Program

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

- Presently, the agency employs **4** 55-a participants. \There are **1** participant 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 **0** participants left the program.

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

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

## **VI. Selection (Hiring and Promotion)**

NOTE: This section must be prepared jointly by Agency HR and DEI-EEO. HR must describe the activities and plans of Agency Career Counselors in A) below. EEO must respond to questions in C) below.

### **A. Career Counselors**

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

SBS will continue to share civil service exam opportunities monthly. In those emails, SBS Employees are encouraged to schedule 1-on-1 meetings with the agency's career counselor to learn more about civil service and how to navigate professional development in the City.

Additional HR representatives will be trained to assist with career counseling and expand the reach of the program. The career counselors will recommend training and exams for the employee that may be helpful for them to meet their development goals.

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

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

SBS will continue to add HR and EEO approved interview questions to the Interview Question Library established last fiscal year.

HR and EEO will also work to send managers to Structured Interview refresher training.

HR will begin meeting with new hires periodically within their first 6 months of employment to assess the employee's onboarding experience and identify barriers as well as areas of improvement in the recruitment and onboarding process.

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

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

In FY 2025, the agency EEO Officer will do the following:

- Ensure that all vacancy announcements include the revised NYC EEO 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 for an interview.
- 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 and/or SmartRecruiter 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 2025.

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

## VII. Training

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

Training Topic	Type of Audience (e.g., All Staff, Front-line Employees, Managers, Supervisors, etc.)	Goal Number of Participants	Projected Dates
1. Everybody Matters: EEO and Diversity & Inclusion Training for NYC Employees (e-learning)	All employees – Biennially (Cycle 2 must be completed by March 31, 2025.)	250	February 28, 2025
2. Everybody Matters: EEO and Diversity & Inclusion Training for NYC Employees (classroom/live webinar)	All employees – Biennially (Cycle 2 must be completed by March 31, 2025.)	100	February 28, 2025
3. Sexual Harassment Prevention (e-learning)	All employees – Annually (Cycle 7 runs between September 1, 2024 – August 31, 2025)	New hires & 250	July 31, 2025
4. Sexual Harassment Prevention (classroom/live webinar)	All employees – Annually (Cycle 7 runs between September 1, 2024 – August 31, 2025)	New hires & 100	July 31, 2025

5. IgbTq – Power of Inclusion (e-learning)	Managers, Supervisors, and Front-line employees (must be completed by March 31, 2026) All other employees		February 28, 2026
6. IgbTq – Power of Inclusion (classroom/live webinar)	Managers, Supervisors, and Front-line employees (must be completed by March 31, 2026) All other employees	New hires & 100	February 28, 2026
7. Disability Awareness and Etiquette	All employees	New hires & 250	Ongoing
8. Structured Interviewing and Unconscious Bias (classroom/live webinar)	Managers, Supervisors	60	Feb 2025
9. Other (specify)			
10. Other (specify)			

## VIII. Reasonable Accommodation

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

- 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 implemented the modifications of Reasonable Accommodation Procedure announced in May 2024.
- The agency initiates the cooperative dialogue within 10 days from the request for Reasonable Accommodation.
- The agency grants or denies request within 15 days after from the conclusion of cooperative dialogue.
- When necessary, in certain time-sensitive circumstances the agency conducts and expedited review and grants or denies request in less than 15 days.
- The Agency Head or designee must review and grant or deny an appeal fifteen (15) days after submission of appeal.
- If the review and decision on appeal is not done by the Agency Head.  
Provide the name and title of the designee<sup>1</sup> : \_\_\_\_\_
  - The designee reports directly to the Agency Head.
- The agency will input the Reasonable Accommodation activity on the DCAS Citywide Complaint and Reasonable Accommodation (CAD) Database and update the information as needed.

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

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

### **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 7 – September 1, 2024 – August 31, 2025) as indicated in the Section VII Training above.

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

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

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

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

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

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

[Local Law 27 requires listing a summary of schedule and workplace accommodations that are provided by your agency]. Select the types of accommodations that your agency has provided to your workforce in FY 2024.

Reassignment

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

**E. Local Law 27 (2023): Diversity and Inclusion Training for FY 2025**

- List of diversity and inclusion training for FY 2025 is included in section VII of this annual plan.

**F. Local Law 27 (2023): Workforce Information Report for FY 2024**

- The agency will submit the mandated annual report with workforce information to the Mayor, the Speaker of the Council, the Department of Citywide Administrative Services, and the Equal Employment Practices Commission by September 30, 2024.

**G. Local Law 28 of (2023): Diverse Recruitment and Retention in City Government**

Under LL 28 (2023), agencies must provide information about agency-specific training programs that are required for, or relevant to, an applicant's appointment to a position based on an open-competitive or promotional civil service examination. Additionally, agencies must provide information on expenditures related to recruiting candidates for open competitive and promotional civil service examinations, a list of recruiting events to promote open-competitive civil service examination and a list of any preparatory materials developed for applicants or potential applicants for open-competitive and promotional civil service examinations.

- The agency submitted all information required by LL 28 for FY 2024 using the form and templates provided.

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

Under Executive Order No. 16 of 2016, the agency must provide supervisory and front-line staff training approved by DCAS on transgender diversity and inclusion. Pursuant to Executive Order No. 16, this training must be provided to all newly hired supervisory and managerial employees and line staff whose work tasks involve contact with the public. The current Cycle 5 runs from April 1, 2024, to March 31, 2026.

- The agency plans to train all new employees within 30 days of start date.
- All managers, supervisors, and front-line employees will be re-trained every two years, no later than the third quarter of the Fiscal Year, as indicated in Section VII Training above.

- In addition, all other employees will be trained or re-trained every two years, as indicated in Section VII Training above.
- The agency will ensure that the Transgender Restroom Access notice/poster is posted where required, e.g., on bulletin boards, near restrooms and, in digital form, where other EEO notices and announcements can be found.

## **X. Audits and Corrective Measures**

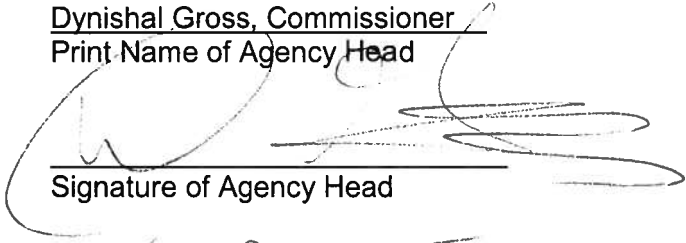
[Please check the statement(s) that apply to your agency].

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

## XI. Agency Head Signature

[Note: Agency Head's signature and date should be provided for final submission only after the agency receives approval of the plan by DCAS.]

Dynishal Gross, Commissioner  
Print Name of Agency Head

  
Signature of Agency Head

6-3-25  
Date





## Appendix A: Contact Information for Agency EEO Personnel and Career Counselors \*

**Agency EEO Office mailing address:** 1 Liberty Plaza, 11<sup>th</sup> Floor, New York, NY 10006

[Please provide contact information (name, title, e-mail, telephone number and **full office address** if different from the main address above, for the following EEO and HR roles at your agency. If several roles are performed by the same individual enter only the name in further entries. Insert additional rows as needed. **NOTE:** Include staff performing any of EEO or HR-related roles in this listing even if they work in another part of the agency and not in the Office of DEI-EEO.

\*To prevent potential conflicts, the Career Counselor should not be within the EEO Office]

	<b>Title/Function</b>	<b>Name</b>	<b>Email</b>	<b>Telephone</b>
1.	<b>Agency EEO Officer</b> [indicate if 'Acting' or 'Interim']	Angelita McDonald	amcdonald@sbs.nyc.gov	212-618-8782
2.	<b>Agency Deputy EEO Officer</b> [if appointed]			
3.	<b>Agency (Chief) Diversity &amp; Inclusion Officer</b> [if appointed]			
4.	<b>Chief Diversity Officer/Chief MWBE Officer per E.O. 59</b>	Dynishal Gross	dgross@sbs.nyc.gov	212-513-6456
5.	<b>ADA Coordinator</b>	Michelle Barnes - Anderson	mbarnes@sbs.nyc.gov	212-618-6717
6.	<b>Disability Rights Coordinator</b>	Michelle Barnes - Anderson	mbarnes@sbs.nyc.gov	212-618-6717
7.	<b>Disability Services Facilitator</b>	Michelle Barnes - Anderson	mbarnes@sbs.nyc.gov	212-618-6717
8.	<b>55-a Coordinator</b>	Michelle Barnes - Anderson	mbarnes@sbs.nyc.gov	212-618-6717
9.	<b>EEO Investigator(s)</b>	Angelita McDonald Clyde Hall	<a href="mailto:amcdonald@sbs.nyc.gov">amcdonald@sbs.nyc.gov</a> <a href="mailto:chall@sbs.nyc.gov">chall@sbs.nyc.gov</a>	212-618-8782 212-513-6375
10.	<b>EEO Counselor(s)</b>	Angelita McDonald	amcdonald@sbs.nyc.gov	212-618-8782
11.	<b>EEO Training Liaison(s)</b>	Angelita McDonald	amcdonald@sbs.nyc.gov	212-618-8782

12.	<b>Career Counselor(s)</b>	Dianna Man Patrick Mui Joya Roy	<a href="mailto:dman@sbs.nyc.gov">dman@sbs.nyc.gov</a> <a href="mailto:pmui@sbs.nyc.gov">pmui@sbs.nyc.gov</a> <a href="mailto:jroy@sbs.nyc.gov">jroy@sbs.nyc.gov</a>	212-618-6798 212-618-8737 212-618-8793
13.	<b>Other (specify)</b>			