

State of Wisconsin
Department of Financial Institutions



Equity and Inclusion Plan

January 1, 2021 – June 30, 2023

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Equity and Inclusion Commitment Letter

The Department of Financial Institutions hereby reaffirms our commitment to the principles of equity and inclusion for all employees and applicants without regard to an individual's race, color, sex, pregnancy, sexual orientation, gender identity, religion, national origin, age, disability, genetic information, military service, arrest and/or conviction record, use or non-use of lawful products off the employer's premises during non-working hours, political affiliation or marital status.

The Department of Financial Institutions is firmly committed to meeting the state laws and policies, as well as federal laws, for equal employment opportunity and affirmative action. The Department of Financial Institutions recognizes that equal employment opportunity is a legal, organizational, and economic necessity in order to maximize the quality and diversity of the state's workforce. This commitment is extended to all job applicants and employees in every type of position, including unclassified, classified, project, limited-term, volunteers, interns, and work-study personnel.

As part of the Department of Financial Institutions' commitment to this overall process, we intend to apply equity and inclusion principles to all employment policies, procedures, and programs, wherever it's appropriate, to ensure equal employment opportunity and freedom from discrimination, including recruitment, selection, job assignment, training, compensation, benefits, discipline, promotion, transfer, layoff, and termination processes. Reasonable accommodations will be provided, as requested, to employees and applicants with disabilities.


The Department of Financial Institutions has developed and committed to maintaining a written Equity and Inclusion Plan. This Equity and Inclusion Plan has my total support, and the Department of Financial Institutions pledges its best good faith efforts to achieve the goals identified in the Equity and Inclusion Plan. I expect each manager, supervisor, and employee of the Department of Financial Institutions to aid in the implementation of this program and be accountable for complying with the objectives of this Equity and Inclusion Plan. The Department of Financial Institutions will maintain a monitoring and reporting system to ensure the overall compliance with the equity and inclusion mandates. The plan is available for review on the Department of Financial Institutions' website or at the Human Resources office.

We look forward to working with the Division of Personnel Management's Bureau of Equity and Inclusion to implement our policies and programs in efforts to correct the present effects of past discrimination and to build a motivated and skilled workforce that is reflective of the population we serve.

Agency Head Name: Kathy Blumenfeld, Department Secretary

Signature/Date: Kathy Blumenfeld 12/7/20 Cheryll Olson-Collins 1/16/2022

Equity and Inclusion Officer Name: Brenda Brewer

Signature/Date:  12/02/2020 ended role on 1/17/2021
Regina Howard - 3/29/2021

Individuals Responsible for Directing/Implementing the Equity and Inclusion Plan

Agency Appointing Authority

The state agency appointing authority carries the overall responsibility for establishing an Equity and Inclusion Program, including goals, timetables, and compliance with all federal and state laws and regulations. The Appointing Authority:

- Communicates the direction and vision to agency leadership that ensures involvement and commitment to the agency's equity and inclusion efforts.
- Develops an equity and inclusion action plan to implement strategies that will comply with affirmative action, equity, and inclusion requirements, build infrastructure and culture committed to equity and inclusion, and incorporates equity and inclusion throughout the agency's work and public service.
- Engages a representative employee and stakeholder group in the planning and development process for the EI Plan to review equity and inclusion-related data, recommends opportunities for improvement, and provides support and shared ownership of agency strategies and desired outcomes.
- Ensures that that designated personnel responsible for equity and inclusion efforts and programs are given the necessary authority, top management support, and resources to successfully implement their assigned responsibilities.
- Assesses and ensures internal workplace policies and procedures are equitable, culturally responsive, and promote inclusion.
- Provide professional development opportunities and resources that raise awareness, build knowledge and understanding, and encourage and promote an inclusive culture.
- Seeks advice and guidance from the Equity and Inclusion Advisory Committee (DEI Committee) on agency EI programs, initiatives, and policies.

Name of individual responsible

Name: Kathy Blumenfeld Cheryll Olson-Collins 1/16/2022 **Title:** Department Secretary

Email: kathy.blumenfeld@dfi.wi.gov

Phone: (608) 267-1710

cheryll.olsoncollins@dfi.wisconsin.gov

Equity and Inclusion Officer

The Equity and Inclusion Officer (EIO) or designee, as delegated by the EIO, is directly responsible for developing, coordinating, implementing the agency's E&I plan. The Equity and Inclusion Officer:

- Plans, guides, and advises the appointing authority and executive leadership in establishing and maintaining equity and inclusion plans, programs, and policies. This includes engaging the appropriate individuals and stakeholders throughout the development and implementation and continuous improvement activities of plan actions.
- Coordinates, develops, and implements equity and inclusion initiatives that support the agency's EI Plan goals.
- Keeps the agency head and agency leadership at various organizational levels informed of EI developments, progress, and potential concerns.
- Ensures communication and dissemination of the EI Plan, policy and program information, and employee access to the EI Plan and related policies.
- Works with leadership to identify, coordinate, facilitate, or provide equity and inclusion training to increase awareness, support, and maintain compliance.
- Establishes and maintains internal monitoring, auditing, and reporting system to measure the effectiveness of the agency's programs and activities, ensure compliance, and meet state and federal requirements. This includes gathering, researching, and analyzing data.
- Audits hiring and promotion patterns and the selection of candidates for career development and training programs to remove barriers.
- Ensures agency selection criteria are objective, uniform and job-related, and that personnel decision-making processes adhere to EEO and AA principles.
- Promotes and coordinates agency participation in enterprise equity and inclusion programs and initiatives.
- Serves as the agency's point of contact for professional organizations and community groups to promote and assist with employment opportunities for underrepresented groups.

- Attends at least twelve (12) hours of equity and inclusion and agency supervisory training annually.
- Participates in and advises the agency's Equity and Inclusion Committee (DEI Committee) as a non-voting member.
- Reviews policies, procedures, and practices, and recommends changes to the Executive HR Manager.

Name of individual responsible

Name: Brenda Brewer Regina Howard - 3/29/2021 **Title:** EEO Program Officer
Email: brendak.brewer@dot.wi.gov **Phone:** (608) 266-0208
reginam.howard@dot.wi.gov

Equity and Inclusion Designee/Professional

The EI designee/professional is responsible for assisting with the implementation of the equity and inclusion plan efforts within Region 1 HR. The EI designee/professional:

- Ensures dissemination of all relevant equity and inclusion information to appropriate staff.
- Reviews policies, procedures, and practices, and recommends changes to the EIO.
- Assists in the development, implementation, and management oversight of policies, programs, and procedures for the administration of EI efforts for the agency.
- Assists with the promotion and coordination of agency equity and inclusion programs and initiatives, including the State Student Diversity Internship program, the annual state Diversity Awards, the non-competitive appointment for certain disabled veteran's program, the W-2 program, the disabled veteran's program, etc.
- Ensures communication and dissemination of EI Strategic Plan, policy and program information, and employee access to the plan and related policies.
- Assists the EI Officer in conducting periodic audits of recruitment activity to measure the effectiveness of efforts and activities in attaining equity and inclusion goals and objectives.
- Attends equity and inclusion and agency supervisory training annually, as required.
- As designated, manages the agency's medical issues. This may include coordinating and monitoring the agency's FMLA and reasonable accommodation requirements to ensure compliance with the Americans with Disabilities Act (ADA).

Name of individual responsible

Regina Howard - 3/29/2021
Name: Brenda Brewer **Title:** EEO Program Officer
Email: brendak.brewer@dot.wi.gov **Phone:** 608-266-0208
reginam.howard@dot.wi.gov

Executive HR Manager

The Executive HR Manager is responsible for ensuring equitable and consistent administration and application of all personnel policies and provides direct supervision of the EI Officer and EI professionals. The Executive HR Manager:

- Maintains effective working relationships with the agency EIO and designees.
- Provides leadership to HR staff and others to ensure personnel decision-making processes adhere to affirmative action, equal opportunity, and equity and inclusion principles.
- Ensures the hiring managers and supervisors work effectively with the EIO to develop and execute the EI Plan.
- Provides the EIO the support and data necessary to perform duties and responsibilities related to equity and inclusion.

Name of individual responsible

Name: Randy Sarver **Title:** Executive HR Manager
Email: randy.sarver@dot.wi.gov **Phone:** (608) 266-0507

Introduction

The Department of Financial Institutions' mission is to protect the safety and soundness of Wisconsin's financial institutions, safeguard the investing public, facilitate commerce and increase financial capability throughout the state, with a vision of achieving financial wellbeing for Wisconsin. In accordance with its core values, the Department acts with ethics and integrity, values competence and is committed to teamwork. The Department takes pride in its positivity and values diversity in thinking, background and cultures.

The Department recognizes that recruiting and retaining a diverse workforce and fostering an inclusive work environment are the foundations for achieving diversity in thinking, background and cultures. It is in this type of work environment that employees truly feel free to express their unique thoughts, ideas and opinions. This, in turn, fosters understanding and acceptance, better ideas and solutions, and better representation of the diverse population the Department serves.

The Department of Financial Institutions is comprised of 149 employees in the following divisions and offices:

- Administrative Services and Technology
- Banking
- Corporate and Consumer Services
- Securities
- Office of Credit Unions

In compliance with Executive Order 59, the Department of Financial Institutions (DFI) formed a diverse group of employees from across the agency to serve on the Department's Diversity, Equity and Inclusion (DEI) Committee. This committee met throughout the spring and summer of 2020 to recommend goals to the Secretary's Office related to recruitment, retention and agency culture. The committee also discussed their experiences at DFI and what they have seen in other organizations that facilitated a diverse and inclusive culture.

Through discussions, small group meetings and data analysis, the committee finalized recommendations and presented them to the Secretary's Office for consideration and approval.

Workforce Analysis Summary

As part of the workforce analysis process, the DEI Committee reviewed the following data:

- 2020 State Underutilization Report
- 2020 Department employee demographic data
- 2020 Department retirement projections
- 2019 Department employee exit interview responses
- 2019 Department hiring flow demographics
- 2019 Department attrition summary

Demographic data provided by Region 1 Human Resources, as of February 12, 2020, indicates that African-American employees represent 1.94% of the workforce and 0% of supervisors/managers. This compares to 11.45% of the 2019 applicant pool identifying as African-American, according to applicant data. In 2019, minorities made up 25.95% of the applicant pool, with 35% of applicants hired self-identifying as minorities. However, none of the minority candidates hired in 2019 self-identified as African-American. The data shows there are barriers for African-Americans in the applicant screening process.

The 2020 State Underutilization Report identified DFI as being underutilized for women in fiscal (examiner) positions, which was a repeat finding from the 2017 State Underutilization Report. In 2019, DFI recruited for eight (8) Financial Examiner positions. Four recruitments resulted in a higher number of initial applications from women. However, in three (3) recruitments, more men were certified to participate in the interview process than women. Overall, four (4) women and four (4) men were hired into the Financial Examiner positions. The data shows there may be potential barriers for women during the applicant screening process.

There appears to be a trend of newer employees, primarily in the younger age categories, leaving the agency. The agency needs to retain these employees in order to grow and develop talent that can fill leadership vacancies that will arise when long-term employees retire. Department demographics show that 70% of staff-level employees have less than ten years of seniority and 15% of staff-level employees have more than twenty-five years of experience. There is a deficiency in the distribution of staff in the ten to twenty-five-year seniority range. Between July 2018 and April 2020, fourteen (14) departing DFI employees participated in exit interviews. Nine (9) of those employees had less than five (5) years seniority. Four (4) employees indicated family or personal reasons were their top reason for leaving the agency, three (3) indicated their job duties and/or lack of advancement were their top reason for leaving and two (2) indicated agency culture was their top reason for leaving. Those two individuals also cited their relationship with their supervisor as one of the reasons they left. As a result, more opportunities will be provided for supervisors and all staff to participate in education and outreach regarding equity and inclusion. Increasing equity and inclusion learning resources should ideally help promote staff commitment to fostering a respectful and inclusive work environment.

Data regarding retirement projections shows that 24% of all employees (staff and supervisors) are eligible to retire within the next five (5) years, which poses a risk of institutional knowledge leaving the agency. In addition, DEI Committee members have identified the need for better processes for on-boarding new management and supervisors.

Goals and Strategies/Action Items

The Secretary’s Office reviewed the recommendations from the Department of Financial Institutions’ DEI Committee and approved the following overarching goals for the Department’s Equity and Inclusion Plan (EI Plan). Each goal has several strategies or action items identified to assist in achieving the goals. The goals, strategies and action items represent the dedicated work of the committee and align with the agency’s value on diversity.

Overarching Goals	Strategies or Action Items to Achieve Goals
<p>Recruitment Goals:</p> <p>Increase notifications to diverse organizations regarding vacancies.</p> <p>Educate raters and interview panel members on process and bias awareness prior to placement on panels.</p>	<ul style="list-style-type: none"> • Diversify where position vacancies are posted. • Provide EI Plan goals to screening & interview panel members prior to recruitment. • Provide unconscious bias training to screening and interview panel members prior to recruitment. • Increase the training of supervisors on diversity topics. • Require annual meeting for all supervisors with DEI Committee and/or EIO, to discuss Equity and Inclusion (EI)-related topics. • Annually dedicate a portion of an all-agency meeting to discuss specific diversity topics or EI Plan progress.
<p>Retention Goals:</p> <p>Address risks associated with a significant percent of the workforce eligible for retirement in the next five years.</p> <p>Address gap in employees in the ten to twenty-five-year seniority range.</p>	<ul style="list-style-type: none"> • Develop a process for transitioning new management while departing management is still in place. • Keep track of industry compensation standards and propose changes to compensation, if necessary. • Review flexible scheduling policies as necessary in order to continue to be supportive of flexible scheduling. • Review retention data annually and determine if scheduling is a factor in employee departures.
<p>Agency Culture Goals:</p> <p>Increased employee commitment to fostering a respectful and inclusive work environment through outreach and education.</p>	<ul style="list-style-type: none"> • Identify potential training needed on EI topics. • Develop a training resource list and materials regarding equity, inclusion and diversity. • Provide semi-annual EI training for management and annual EI training for all staff.

Workplan

The below tables summarize the workplan efforts for each strategy and action item. Any associated training that may be needed to implement the workplan is identified under each workplan.

Recruitment Goals: Increase outreach to diverse professional organizations regarding job opportunities. Educate raters and interview panel members on process and bias awareness prior to placement on panels.

Recruitment Goal – Strategies or Action Items	Specific Actions	Key Performance Indicators	Outcome/Metric	Responsible staff/office	Targeted Completion Date
Increase outreach to diverse professional organizations regarding job opportunities.	Expand postings to more specifically targeted professional groups.	Increase in the number diversity-related professional groups that receive notifications of job opportunities.	Increase in the number of target group candidates that advance to the selection process.	Region 1 EIO Region 1 HR	December 31, 2021
Provide E&I Plan goals to screening & interview panel members prior to recruitment.	Develop a handout and points for consideration related to the EI Plan and hiring goals. Provide handout to screening/hiring panel members.	Increased panel member awareness of EI hiring goals, disproportionate staffing and how unconscious bias may influence the selection process.	Increase in the number of target group candidates that advance to the interview process and are selected to fill the position.	Region 1 EIO Region 1 HR Specialists	December 31, 2021 Ongoing from January 1, 2022
Provide unconscious bias training to screening & interview panel members prior to recruitment.	Develop an online training module regarding unconscious bias. Ensure all screening and interview panel members have participated in the training prior to participating in the screening/hiring process.	Increased panel awareness of unconscious bias and how it influences the selection process.	Increase in the number of target group candidates that advance to the interview process and are selected to fill the position.	Region 1 EIO Region 1 Training Officer	December 31, 2021 Ongoing from January 1, 2022
Increase training of supervisors on diversity-related topics.	Require new supervisors to attend three (3) EI-related trainings within their probationary period. Hold an annual meeting for all supervisors with EI Committee and/or Region 1 EIO, to discuss EI topics, in a training on new topics, followed by open discussion format. Direct manager confirms training completions to Training Officer. Training officer confirms completion by those who are near end of probationary period.	Increased supervisory awareness of EI hiring goals, disproportionate staffing and unconscious bias.	Increase in the number of target group candidates being selected to fill positions.	Region 1 Training Officer Region 1 EIO DEI Committee DFI Management	By June 30, annually By June 30, annually Prior to final probationary evaluation By June 30, annually
Require annual diversity training for all staff.	Annually dedicate part of an agency-wide meeting to EI Plan progress or training on specific diversity topics.	Increased staff commitment to equity and	DFI gains a reputation as a diverse and inclusive	Region 1 Training Officer	By June 30, annually

	<p>Include a general open table discussion on diversity, equity and inclusion, facilitated by the appropriate HR representative(s). This could be aligned with any enterprise-wide training provided by BEI.</p> <p>All new employees will be required to participate in BEI's mandatory training, <u>Moving Beyond Compliance</u>.</p>	inclusion in the workplace.	employer, which in turn increases in the number of target group applicants.	Region 1 EIO DEI Committee	Within thirty (30) days from start date.
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Associated Training	<ul style="list-style-type: none"> • Unconscious Bias training for screening/hiring panel members • Educate employees, recruitment staff and screening/hiring panel members on EI Plan goals and progress • Train discussion facilitators on how to facilitate conversations regarding sensitive topics • <u>Moving Beyond Compliance</u> training module.
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Retention Goal: Address the gap in employees in the ten to twenty-five-year seniority range, as well as risks associated with a significant percent of the workforce eligible for retirement in the next five years.

Retention Goal – Strategies or Action Items	Actions	Key Performance Indicators	Outcome/Metric	Responsible staff/office	Targeted Completion Date
Develop a process for transitioning new management while departing management is still in place.	Develop written standard operating procedures.	New managers will have an increased understanding and ability to perform their roles.	New managers will be better prepared to transition into their management roles when incumbents depart.	Management in all DFI divisions	By December 31, 2021
Keep tabs on industry compensation standards.	<p>Review retention data annually and determine where pay is factor in employee departures.</p> <p>Propose changes to compensation, if necessary.</p>	Compensation will be more competitive with other agencies and the private sector.	Increased retention of employees in the mid-seniority range.	Region 1 Human Resources DFI Secretary's Office	<p>By December 31, annually</p> <p>By June 30, annually</p>
Offer flexible work schedules.	<p>Review informal policies regarding flexible schedules.</p> <p>Review retention data annually and determine if scheduling is a factor in employee departures.</p>	The agency will continue to support a work-life balance that is competitive with other agencies and the private sector.	Increased retention of employees in the mid-seniority range.	Region 1 Human Resources DFI Management	<p>December 31, 2021</p> <p>By December 31, annually</p>

Associated Training	<ul style="list-style-type: none"> • Data analysis • Succession planning
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Agency Culture Goal Ensure and enhance employee knowledge and awareness of equity and inclusion topics in order to increase commitment to fostering a respectful and inclusive work environment.

Agency Culture Goal – Strategies or Action Items	Actions	Key Performance Indicators	Outcome/Metric	Responsible staff/office	Targeted Completion Date
Identify potential EI training needs.	Speaker/moderator meet with Divisions to facilitate identification of training needs.	Increased understanding of current staff knowledge of EI topics and issues.	Identification of staff EI training needs.	Region 1 Training Officer DFI Management	December 31, 2021
Develop EI training resource list.	Gather information from DFI Division meetings mentioned above. Also gather resources from ELM, Cornerstone and DFI Lunch & Learns to develop an EI training list. Provide training resource list to members of DFI management and members of screening and interview panels.	Increased awareness of the areas where training is needed. Managers and panel members view processes through an EI lens and understand the role bias plays in the workplace.	Reduction in the number of employee respectful workplace complaints. Increased number of target group candidates advancing during the selection process due to decreased implicit bias.	Region 1 Training Officer DFI Management	June 30, 2022 Ongoing during each recruitment, beginning July 1, 2022
Provide semi-annual EI training for management and annual training for all staff.	Offer training topic(s) based on identified EI training needs/interests.	Management will participate in two (2) EI-related trainings annually. All other staff will participate in one (1) EI-related training annually. All new employees will take BEI's <u>Moving Beyond Compliance</u> training module.	Management stays informed about EI-related topics and actively applies knowledge to foster a respectful and inclusive work environment. Employees stay informed about current EI-related topics and actively apply knowledge in order to foster a respectful and inclusive work environment.	Region 1 Training Officer DEI Committee	By June 30, annually By June 30, annually Within thirty (30) days of start date.

Associated Training	<ul style="list-style-type: none"> Equity, Inclusion and Diversity training will be identified via action items. <u>Moving Beyond Compliance</u> training module.
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Communication of Equity and Inclusion Plan

In order for the Equity and Inclusion Plan to be effective, management and employees need to be aware of its existence and contents. Information about the EI Plan will be communicated internally by the following methods:

- The Department Secretary will ensure the plan is posted on the Department's intranet site.
- The Department Secretary will send an email to all employees outlining the plan and informing employees where they may find the plan on the agency's intranet site.
- The Region 1 Executive HR Manager or EEO Program Officer will share the plan with Division Administrators and their management teams at upcoming management meetings.
- The EEO Program Officer will ensure that nondiscrimination and equal opportunity notices are prominently displayed in an area that is accessible and frequented by all employees.

In order to understand the Department's commitment to all members of the community and other stakeholder groups, it's important to communicate the EI plan to external customers and stakeholders as well. Information about the EI Plan will be communicated externally by the following method(s):

- The Department Secretary will ensure the plan is posted on the Department's public internet site.
- The Department Secretary will ensure the plan is posted on the Department's Facebook page.
- The EEO Program Officer will ensure that nondiscrimination and equal opportunity notices are prominently displayed in areas that are frequented by and accessible to the public.

Anyone with questions, concerns or other feedback regarding the EI Plan will be directed to the Region 1 EEO Program Officer, who will address them promptly.

Agency Monitoring

The implementation of the Equity and Inclusion Plan will be monitored by executive leadership, Human Resources and the Diversity, Equity and Inclusion Committee (which consists of the DFI Equity and Inclusion Committee members). The EEO Program Officer will review progress of the plan on a quarterly basis. If there are areas where implementation of plan strategies are not progressing as planned, Human Resources will work with the necessary parties to identify any barriers to plan progress and develop an action plan to overcome those barriers.

The EEO Program Officer will provide progress updates to the HR Director, Secretary's Office and the Department's Equity and Inclusion Committee on a quarterly basis. These updates will be published on DFI's intranet and internet sites, as well as its Facebook page. Updates will include information on how and where feedback regarding the plan and its process may be provided.

Division Administrators will be kept apprised of these updates by the EEO Program Officer on a quarterly basis. Updates will include information on how and where employees may provide feedback regarding the plan and its process. Administrators will be responsible for sharing the updates with their respective management teams.

Tracking and analysis of recruitment and retention issues will also be conducted by the EEO Program Officer and any other relevant parties on a biannual basis.