



2024 DIVERSITY, EQUITY AND INCLUSION, GAP AND BARRIER ANALYSIS REPORT

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Abbreviations Used Throughout This Document

- Town = Town Government
- DEI = Diversity, Equity and Inclusion
- ER = Elite Research
- REG = Racial Equity Group
- Minority, Women Business Enterprise = MWBE

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EXECUTIVE SUMMARY

In February 2021, the Town adopted an Anti-Racism and Anti-Bias Statement, to make it clear to residents that anti-racist and anti-bias values are values that the Board espouses and holds very strongly. A DEI Committee and Task Force was formed in December 2021, and included Town officials, and diverse community residents. In July 2023, the Town requested proposals to expand upon the Town's current DEI initiatives by conducting an equity audit and developing a comprehensive, meaningful DEI strategy for the Town of Wellesley based upon the findings of the equity audit. With support from the Select Board, School Committee, and Town Meeting, the Wellesley DEI Task Force determined that the Town should move forward with efforts to create, implement, and maintain a more equitable and inclusive Town. Those efforts include identifying immediate actions as well as long-term systemic changes in order to actualize diversity, equity, and inclusion within Town government and the community.

With respect to Town government, the desired deliverables included the following:

- To increase the diversity of the Town's workforce, boards, and committees
- To deliver services in an equitable, caring, fair, and inclusive manner
- To increase cultural responsiveness and build excellence in communication and customer service for everyone in Wellesley, regardless of race, ethnicity, gender, sexual orientation, age, disability, or any other factor
- To work with all departments to build support for DEI and to integrate DEI into decision making, policies, practices, procedures, and services

With respect to the community, the desired deliverables included the following:

- To institutionalize equity, while reinforcing inclusion and affirming diverse identities and experiences
- To support victims of hate and bias, foster respect, and celebrate differences
- To build more meaningful engagement with those whose input has historically been at the margins; and
- To provide better access for people who speak a language other than English or have disabilities.

In October 2023, the Town awarded Racial Equity Group (REG) the contract to assist the Town in achieving the above objectives and deliverables. REG's framework and approach included the following:

- Facilitated a series of foundational **DEI training sessions** for the Select Board Office, and department leaders to develop a shared understanding and language regarding DEI terminology and concepts.
- Administered a **DEI audit assessment** to measure the Town's level of commitment based on DEI best practices and to establish a baseline and benchmark for measuring staff perceptions on the Town's commitment to DEI.
- Conducted **focus groups interviews with residents and stakeholders** to understand their lived experiences related to DEI and to collect feedback and ideas on how to make the Town more inclusive and a community where all residents have a sense of belonging.
















- Administered a **community wide convenience sampling survey** to gain insights if residents and stakeholders have equitable access to Town services, programs, jobs and contracts, are treated fairly by Town staff, and receive quality services and programs.
- Conducted **disparity and inequity representation analysis** within employment, purchasing and procurement, services and programs, boards and committees, to identify any significant disparities or “inequities” within representation for a particular demographic group.
- Conducted a **best practices gap and barrier analysis** by evaluating Town current policies and practices benchmarked against evidenced-based best practices for advancing equal opportunity within employment, purchasing and procurement, services and programs, and boards and committees.





This entire audit and resulting report was voluntarily requested as a reaffirmation of commitment to equal opportunity throughout Town operations and are not admissions that any demographic group is subjected to discrimination in any way, or in violation of federal, state or local laws.

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OVERALL FINDINGS

After examining the Town's current policies and practices benchmarked against evidenced-based best practices, the gap analysis below illustrates the Town's current status related to advancing equal opportunity and DEI.

	Evidenced-based Best Practices	CURRENT STATUS
1	Dedicated position responsible for DEI e.g. diversity officer)	
2	Council or committee monitoring DEI progress	
3	Collects demographic data on applicants, current employees, volunteers, vendors and contractors	
4	Disparity analysis conducted to identify if inequities exist within employment, service delivery/programs, purchasing and procurement, representation on boards/committees	
5	Senior leaders are engaged in DEI goal setting (e.g. periodically reviews inequity data by department and establishes aspirational goals)	
6	Leadership performance and/or compensation (e.g. annual merit and step increases) are a component of DEI performance goals	
7	Written DEI action plan(s) with validated benchmarks and targets	
8	DEI goals, targets and metrics monitored periodically (e.g. quarterly)	
9	Ongoing DEI training available for all employees and not mandatory	
10	Formal mentoring program available for all employees (if inequities identified in promotions)	
11	Internal and external stakeholder reports shared to communicate progress on DEI goals	
12	Conducts periodic employee engagement surveys to measure workplace climate, belonging and inclusion	
13	All survey (e.g. community, employee, supplier) response data is disaggregated by demographic groups (e.g. race/ethnicity, gender)	
14	Targeted recruitment strategy to attract diverse job applicants (e.g. race/ethnicity, gender)	
15	Targeted recruitment strategy to attract diverse vendors, contractors, board and committee volunteers (e.g. race/ethnicity, gender)	

-  **Not started:** practice not present, inactive or currently undetermined
-  **Emerging:** discussions and considerations of the practice are awaiting approval decision
-  **Establishing:** practice partially in place or process for implementation has started
-  **Reinforcing:** practice currently present and active

The recommendations provided below and on the following pages, are based on REG's observations and provide insight into the Town's current status regarding present and active best practices for advancing equal opportunity and DEI. (numbers in parentheses align to specific best practices listed on the previous page).

- **Develop a DEI Resolution to embed DEI best practices into Town operations.**
This action has been successfully completed.
- **Establish Town-wide aspirational goals for employment representation.**
The Town has an opportunity to attract and retain diverse talent. About 26 percent of the Town's relevant recruitment area labor pool is people of color. With an expanded and targeted recruitment strategy and forecasting upcoming job vacancies, the Town should proactively ensure all positions are open to external candidates to attract and select the most qualified candidates. This may also include collaborating with labor unions by informing them of inequities for specific job groups and developing a shared purpose to ensure equal opportunity through the collective bargaining process. Aspirational goals are good faith efforts to expand outreach to qualified candidates and are not quotas.
- **Establish Town-wide aspirational goals for purchasing and procurement representation.**
The Town has an opportunity to attract minority and women owned business enterprises (MWBES). About 15 percent of businesses in the Town's relevant market area are minority businesses and 14 percent are White woman-owned firms that could potentially do business with the Town. Aspirational goals are good faith efforts to expand outreach to qualified suppliers and are not quotas.
- **Standardized DEI commitment statements on all job postings, and purchasing and procurement forms.** The Town currently includes an EEO statement on all job postings and should continue this practice. The Town should also include additional equal opportunity commitment language as well as add the language on its purchasing and procurement forms, and all current bids and request for proposals. An example of additional equal opportunity commitment language policy has been provided by REG within the policy recommendations section of this report.
- **Develop a process for periodically reviewing job descriptions and validating qualifications.**
The Town is currently reviewing job descriptions and updating them to prevent unnecessary barriers for attracting talent. The Town should not lower requirements, but should validate all criteria as a valid business necessity and consider if alternatives can satisfy job criteria (e.g. Master's degree vs experience vs on the job training). An example job descriptions policy has been provided by REG within the policy recommendations section of this report.
- **Consider creating a dedicated position responsible for DEI (e.g. diversity officer); (1) and (2).**
Having a dedicated position responsible for managing DEI and reporting directly to the Town Administrator is one of the most effective evidenced-based components for advancing DEI. The Town should ensure this role has an adequate budget and support to manage and implement recommendations from this gap and barrier analysis report.
- **Collect demographic data for job applicants, current employees, volunteers, vendors and contractors (3).** The Town is collecting demographic data on employees as required by the federal government, but not collecting data for volunteers and suppliers. The Town should survey board volunteers, and vendors and contractors to allow them to voluntarily identify their

social demographic status.

- **Conduct disparity analysis to identify if inequities exist within employment, service delivery/programs, purchasing and procurement, representation on boards/committees (4).** The Town was able to identify disparities and inequities within its workforce, services and programs, where people of color reported significantly lower agreement than Whites regarding the accessibility of town meeting and elected officials, a sense of belonging and inclusion within the community and encountering discrimination. After surveying current board and committee members, and vendors and contractors, the Town should analyze representation data and compare it to the validated benchmarks provided in this report. If inequities are discovered, the Town should identify what policies or practices may be unintentionally driving the inequities and opportunities to expand outreach and attract diverse board and committee volunteers, as well as vendors and contractors.
- **Senior leaders are engaged in DEI goal setting (e.g. periodically reviews disparity data by department) (5).** Town executives and departments leaders should continue to be engaged when reviewing disparity and inequity data and identifying policies and practices that contribute to inequities. Departments leaders should be expected to help address any inequities to help the Town advance DEI. Example goals may be underrepresentation of employment or procurement spending with minority businesses within certain departments (see additional goal examples in best practice (6). Data from the DEI audit staff survey revealed staff of color and White staff have observed unfair treatment and a lack of inclusion based on a person's social identity. Staff separations are also significant for Black and Hispanic staff. Senior leaders should be engaged to address these issues and cultivate a fair and inclusive workplace in all departments.
- **Leadership performance and/or compensation (e.g. annual merit and step increases) tied to DEI component of performance goals (6).** What gets measured gets done. To prevent conflicting priorities from managers and leaders, senior leaders should be involved in establishing DEI goals. Annual merit or step increases should also be aligned to a successful performance review that includes DEI related performance goals. While DEI goals will be different for various managers and leaders, below are example competencies and goals to be used to demonstrate developing actual goals and competencies;
 - a. makes substantial progress on implementing equal opportunity within the department;
 - b. ensures strategic priorities, budgeting, purchasing, recruitment, and other decisions involve considerations of equal opportunity in order to reduce any identified inequities
 - c. educates Town departments and staff on how to apply a DEI mindset within decision-making in order to advance DEI and achieve inequity reduction goals while not discriminating
 - d. provides timely reports on progress made towards meeting the DEI Action plan goals.
 - e. works closely with external organizations (e.g. State supplier diversity office, MassHire, Black Economic Council of Mass) to provide support and assistance to Town departments for promoting equity within purchasing and procurement
 - f. evaluates zoning laws to promote diverse neighborhoods and affordable housing
 - g. effectively manages staff by recruiting, promoting, and retaining a highly qualified, diverse staff

- **Written DEI action plan(s) with validated benchmarks and targets (7).** Once disparity and inequity data, as well as policies and practices are reviewed, a written action plan must be developed. The action plan should include short and long-term goals that state how much will be achieved, and by when. REG has created a recommended action plan and scorecard based on the findings in this report. The Town can determine how to prioritize the recommendations based on current priorities and resource constraints.
- **DEI goals, targets and metrics monitored periodically (e.g. quarterly) (8).** The Town should develop metrics and indicators to allow tracking of DEI progress. REG has provided metrics and indicators within the DEI action plan and scorecard for the Town to consider.
- **Ongoing DEI training available for all employees and not mandatory (9).** The Town has recently conducted foundational DEI training for all department leaders, it should continue to make training available for department leaders and all staff on a voluntary basis. Foundational DEI training should be mandatory for all staff and new employees and included within the orientation and onboarding process. The training must be relevant and align to the job duties of staff.
- **Formal mentoring program available for all employees (10).** Mentoring programs are effective for facilitating promotions of underrepresented groups and increasing representation within management. The Town does not need to focus on a formal mentoring program at this time, instead the Town should focus resources on increasing outreach to attract diverse talent.
- **Internal and external stakeholder reports are shared to communicate progress on DEI goals (11).** The Town currently is very transparent with its DEI reporting and progress updates, and should continue to provide a summarized report included on the DEI webpage and monthly newsletters, Town 's annual report or strategic plan, that illustrates DEI goals, action plans and current status of all goals and other achievements.
- **Conducts periodic employee engagement surveys to measure workplace climate, belonging and inclusion (12) (13).** The Town recently completed a DEI audit assessment survey that measured DEI as well as belonging and inclusion. The Town should continue surveying employees periodically every 12 to 18 months, or as appropriate to allow the Town to demonstrate progress. The Town must ensure all survey response data is disaggregated by demographic groups, primarily race/ethnicity, gender and other protected class identities.
- **Targeted recruitment strategy to attract diverse job applicants, vendors and contractors, board and committee members (14) (15).** One of the most effective tools for advancing equal opportunity is the targeted recruitment of underrepresented groups. The Town must explore strategies such as partnering with external organizations that represent diverse professionals and business owners. The Town needs to develop long-term relationships with these organizations to expand the pool of talent and suppliers. The Town should invest in an applicant tracking platform (e.g. Lever) that allows tracking demographics of job applicants to measure the performance of its recruitment outreach strategy and adjust accordingly. The Town should consider developing a formal paid internship program for building a pipeline of potential talent (e.g. MassHire, METCO). The internship program will be an investment in a potential pipeline of talent for the Town. To attract diverse suppliers, the Town's purchasing and procurement department should develop relationships with the State Supplier Diversity Office and the Black Economic Council of Massachusetts (BECMA) to assist in identifying diverse vendors.

STRATEGIC OBJECTIVES

The Town of Wellesley is focused on improving the quality of life for all residents. This Gap and Barrier Analysis report, and all recommendations included are a core component of operationalizing the Town's stated commitment. To help prioritize where to start, REG recommends focusing on the following three strategic objectives:

- 1.0 Attract and Retain Diverse Talent
- 2.0 Measure and Monitor Equity for Vendors and Contractors
- 3.0 Enhance Belonging and Inclusion for all Residents and Stakeholders

❖ Objective 1.0: Attract and Retain Diverse Talent

Is there equal opportunity to be employed with the Town of Wellesley? Is the Town's talent pool limited, homogenous, and only based on referrals of current employee's social and professional networks? These are critical questions the Town desired to answer using a data-driven approach. After conducting a disparity analysis of the Town's overall workforce and within seven job categories, the data clearly illustrated significant disparities or "racial inequities," for people of color.

- People of color are significantly underrepresented within **Officials and Administrators job category** (e.g. management and executive), triggering racial inequities based on availability. White employees are overrepresented by 16 percent.
- For **Professionals**, Asians, Blacks and Two or more races are significantly underrepresented triggering racial inequities. Hispanics are marginally close to being significantly underrepresented. White employees are slightly overrepresented by 20 percent.
- Regarding the job category of **Technicians**, Hispanics are marginally close to being significantly underrepresented. Black, Asian, and Two or more races, are significantly underrepresented triggering racial inequities. Whites are overrepresented by 35 percent.
- For **Protective sworn and non-sworn** service positions, people of color are significantly underrepresented triggering racial inequities. ..
- Only three racial/ethnic groups, Blacks, Asians, and Two or more races, displayed racial inequities for **Office and Clerical positions**. Hispanics are near parity or employed at rates equal to their availability in the labor market. Whites are slightly overrepresented by 22 percent.
- For **Skilled Craft positions**, Blacks, Asians and Two or more races are significantly underrepresented and below the 80 percent threshold, triggering racial inequities. Hispanics and Whites are near parity.
- Finally for **Service Maintenance** job positions, White employees are overrepresented by 66 percent. People of color are significantly underrepresented, triggering racial inequities. (Additional descriptions of job categories available in the appendix).

REG also conducted a disparity analysis for gender (females vs males) within the Town's overall workforce representation. **Women are significantly underrepresented** based on their availability in the labor market, triggering gender inequities.

- For the seven job categories analyzed, we find women significantly underrepresented in Officials and Administrators, Technicians, Skilled Craft and Service Maintenance roles.
- Women are near parity for Protective Service sworn and non-sworn, Office and Clerical roles, and are marginally close to being significantly underrepresented for the Professional job category. We did not observe any gender inequities for men in any of the seven job categories. Men are marginally close to being significantly underrepresented for Office and Clerical positions.

1.1 Develop a Targeted Recruitment Strategy to Attract Diverse Talent

The Town has a great opportunity to establish aspirational employment representation goals (not quotas) to expand recruitment and outreach efforts, that will enable the Town to attract and select the best talent for employment and delivery of Town services and programs. The Town should begin to identify and forecast job openings (union and nonunion) for 2025 and build capacity by developing partnerships with external organizations who serve diverse populations prior to advertising job postings. Below are additional recommended strategies the Town should consider:

- Inform and work collaboratively with all respective labor unions for a shared purpose to close employment inequities for specific job positions and ensure equal employment opportunities.
- Collect applicant demographic data and benchmark against the Town's relevant labor pool. The Town should proactively ensure upcoming job vacancies are open to external candidates and apply a targeted recruitment strategy to attract a diverse slate of candidates. This will require working with local unions and collective bargaining agreements to develop a shared purpose for equal employment opportunity.
- Invest in an applicant tracking platform (e.g. Lever) that allows tracking demographics of job applicants, to measure the performance of the Town's recruitment and outreach strategy.
- Develop a formal internship program that serves a diverse group of students and allows them to explore different Town departments for career awareness and exploration (e.g. METCO, MassHire), but does not exclude individuals due to race/ethnicity and other protected identities.

1.2 Equip Leadership for Creating Fair and Inclusive Workplace Environments

The results of the DEI staff and volunteer survey illustrated the Town's strongest DEI competencies are Knowledge and Competence, as well as Belonging and Inclusion, which indicates staff and volunteers understand how their role, tasks and projects are aligned to DEI, and feel valued, accepted and like they belong while working within Town government. The results also revealed a DEI Commitment Score of 3.58 on a five point scale. Strategies for increasing the Town's DEI commitment score include **establishing performance goals with accountability for department leaders, making DEI training available for staff at every level, and evaluating department policies and practices that advance DEI and equal opportunity for all staff.**

The Town must also develop strategies for retaining talent and cultivating a fair workplace environment. Additional questions not included in the DEI commitment score were asked regarding witnessing or experiencing situations of discrimination on a scale of "Never (1), Rarely (2), Sometimes (3), Often (4)." The questions asked were:

- I have witnessed or experienced situations where the Town didn't treat employees fairly due to factors such as their race, gender, sexual orientation, age, disability, or other identities. 43% of staff who identified as people of color indicated **rarely to often** witnessing or experiencing these situations. 29% of staff of color reported **never** witnessing or experiencing these situations. 31% of White staff indicated they **rarely to often** witness or experience these situations, while 55% of White staff reported **never** witnessing or experiencing these situations.
- I have witnessed or experienced situations where an employee's ideas or perspectives were not valued or considered due to factors such as their race, gender, age, sexual orientation, disability, or other identities. 43% of staff who identified as people of color indicated they **rarely to often** witness or experience these situations. Staff of color who reported **never** witnessing or experiencing these situations was also 43%. About 31% of White staff indicated they **rarely to often** witness or experience these situations, while 61% of White staff reported **never** witnessing or experiencing these situations.

Percentages total less than 100% due to respondents who chose not to answer these items.

- While the participation rate of **Black employees in the Town's total workforce is 2%, they are separating from the Town at a rate of 28.5%. Hispanics represent 5.5% of the workforce and are separating at a rate of 15.8%.** White employees represent 90% of the Town's workforce and are separating at a rate of only 6.4%.

The level of staff experiencing unfair treatment and lack of inclusion in the workplace, based on social identity, is alarming and should immediately be addressed by the Human Resources and Select Board Office. Human resources should implement an exit interview process to monitor talent retention and staff complaints of unfair treatment should be monitored and addressed by the human resources department and/or anonymous channels, and standard grievance procedures.

1.3 Evaluate Job Descriptions and Enhance the Interview Process

The Town does not have a standardized process in place to develop or review job descriptions or job advertisements. Human resources is working with departments to determine required skills, preferred skills and skills that can be learned on the job. The Town needs to **implement a process to review all job descriptions over time to validate criteria and qualifications, prevent biases and barriers for attracting talent.** The Town's interview process for hiring and promotions should include a candidate scoring rubric and a pass score should be established using a clear rating scale that interview panelist can use to more effectively neutralize biases and convert candidate responses into accurate evaluations.

1.4 Collect Demographic Data for Board and Committee Members

Do all residents have equitable access to serve as town meeting, board and committee members, provide input on policies, budgets, projects and programs? The Town does not currently collect demographic data on board and committee members and **should immediately survey town meeting board and committee members and allow them to voluntarily identify their social demographic.** The Town should compare volunteer representation data to the overall census demographics of the Town to determine if inequities and underrepresentation exists for certain groups. If inequities are discovered, the Town should identify what policies or practices may be acting as barriers and unintentionally limiting opportunities for all groups to serve and be represented as volunteers.

❖ Objective 2.0 Measure and Monitor Equity for Vendors and Contractors

Is the Town attracting diverse vendors and contractors, to obtain the best quality and economical products and services? Is there equal opportunity to do business with the Town? The Town does not currently collect voluntary demographic data on suppliers, vendors and contractors to determine if equal opportunity exist.

2.1 Collect Demographic Data on Vendors and Contractors

The Town should survey current vendors and contractors to identify baseline representation of different demographic groups. The Town can determine the minority status of suppliers by surveying current vendors and suppliers, review the vendor's status on statewide contracts. Once representation data is available, a disparity analysis can be conducted to identify if inequities exist for doing business with the Town.

2.2 D Develop a Targeted Recruitment Strategy to Attract Diverse Vendors and Contractors

Over the next six years, the Town plans to spend \$111,012,000 for capital spending projects. For these upcoming projects, either for the Town or in collaboration with Schools, the Town should proactively demonstrate good faith efforts to expand outreach to minority businesses and/or organizations that have relationships with firms owned by minorities. The Commonwealth of Massachusetts Supplier Diversity Office (SDO) defines "minority owned businesses" as a business owned by people of color, specifically businesses owned by people who identify as Asian, Black, Hispanic and Native American.

Currently, 15 percent of all businesses in the Town's relevant market area are minority-owned vendors and contractors available to do business with the Town. White women-owned firms are at 14 percent. A benchmark aspirational goal (not quota) of 15 percent of the Town's purchasing and procurement spending with minority business enterprises and 14 percent for White women-owned firms, are aspirational goals and would demonstrate commitment to equal opportunity, by ensuring full utilization of available minority and woman-owned firms.

The Town follows the procedures outlined by Massachusetts General laws chapter 149 Building Construction, chapter 30, 39M, and 30B, for public works, supplies and services, and design services for public buildings. The laws contain procedures to ensure open and fair competition for contracts paid for with public money. Steps vary slightly based on estimated costs for services. **More importantly, the Massachusetts Inspector General states that municipalities must follow state statutes, and can add additional requirements for contractors.**

The Town's purchasing and procurement department should develop a comprehensive vendor and supplier contact directory, and notify "MWBES," capable of providing the product or service, and also notify the state supplier diversity office (SDO) for assistance in obtaining quotes from MBEs if necessary. REG has provided the Town a list of state certified minority businesses for goods and services, as well as building construction and design services.

The Town should also enact a purchasing policy that requires good faith efforts to utilize state certified MWBEs in bid submissions above \$50,000. While bids will not be rejected if a certain aspirational goal is not met, failures to adhere to the anti-discrimination policies, federal and state laws, including the Massachusetts False Claims Act, may result in an investigation, financial penalties and rejection of a bid. **REG has provided a model of procurement policies on page (15).**

❖ Objective 3.0: Enhance Belonging and Inclusion for all Residents and Stakeholders

Do all residents have equal access to Town services, receive equal treatment when seeking services and participating in programs, and receive equal quality of services? Do residents see their culture and/or social identity reflected in Town government and activities? A convenience sampling community survey was administered to gain initial insights into residents having equitable access, quality and treatment, regarding Town services and programs. A convenience sample survey is often used before conducting a more rigorous and costly study that yields a generalizable and representative sample of the entire Town. Based on data from the convenience sample community survey, which resulted in 968 valid resident and stakeholder responses, the largest statistically significant gaps between White residents and residents of color were the following statements.

- I see my culture and/or identity reflected in Town government and activities.
- I feel connected and a sense of belonging and inclusion within Wellesley.
- I plan to leave Wellesley, or someone I know plans to leave Wellesley because of encountering discrimination due to race/ethnicity, sexual orientation, disability, or other identities.
- I feel Town Meeting and elected officials are accessible to me.

In addition to the community survey, a total of 15 residents and stakeholders participated in a series of focus group interviews, which were conducted remotely. For qualitative research like focus groups, best practices include conducting three interviews of 5 to 8 participants. The maximum number of participants would be 24 participants, and the Town achieved 15 diverse participants. The three focus group interviews resulted in “data saturation,” which indicates that qualitative data collection ceases once we are unable to observe new themes, insights, or patterns from participants. Discussions during the focus groups revealed several key themes. Themes are the main responses shared and discussed in the focus groups. Qualitative analysis revealed five overarching themes across the focus groups listed below:

- Lack of Diverse and Cultural Events
- Positive Town Staff Interactions
- Barriers to Accessing Resources
- Barriers to Inclusive Civic Engagement
- Discrimination Experiences

Below are strategies and actions the Town should explore to enhance a sense of belonging and inclusion for all residents and stakeholders.

3.1 Support Diverse Cultural Events and Activities

The Town should explore and identify opportunities to partner with external organizations (e.g. World of Wellesley, Wellesley College, Wellesley Schools) to provide diverse cultural events and activities that cater to various cultural, and ethnic groups, and improve communication to ensure wider participation. Focus group participants also stated the Town should acknowledge holidays and cultures that represent the Town's diverse population to make all residents feel more welcome and inclusive.

In addition, the Town should devise ways to provide support (e.g. reduce financial barriers, Wellesley Cultural Council grants) attendance of Town staff/elected officials, acknowledgement from Town government for diverse group events and activities.

Town government should explore how the Town and Wellesley Public Schools can work collaboratively to identify overlaps in needs of services for students and families. For example, mental health needs within families who may have lower income or who experience disruptions in employment, may impact parental academic involvement at home, which impacts academic outcomes. The Town and the Schools could work to identify comprehensive family needs and effectively address them together.

3.2 Enhance Complaint and Discrimination Communication Channels

One key finding in our analyses was the recurring theme of discrimination experiences in the Town's community survey, focus group interviews, and staff survey. The Town currently supports the Freedom Team, a non-partisan, community-based initiative, is made up of volunteers who are available to support individuals feeling victimized by incidents of racism and bias that occur within the community. The Town should provide a visible webpage for residents and stakeholders to communicate complaints and discrimination. The webpage may also include information about the Freedom Team.

There were 17 housing discrimination charges filed with the Attorney General's office for Wellesley in 2023 and 2024. All of the complainants stated they lived outside of Wellesley. This may infer housing rights may have been violated. From 2022-2024, there were 47 charges of discrimination filed with the Massachusetts Commission Against Discrimination (MCAD) related to employment, housing and public accommodations. 22 charges were filed for employment discrimination, and to provide perspective, there were 1458 employment discrimination charges filed with the EEOC for the entire state of Massachusetts. Two complaints filed charges against Town government and the Wellesley Housing Authority. There were 21 charges related to housing, and of those, 20 were against local property managers and landlords. public accommodation.

The Town should immediately begin to develop partnerships and outreach to property managers and landlords, educating them regarding fair housing laws and the legal protections provided for people who receive housing subsidies through programs such as "Section 8," and other forms of public assistance, and provide notice that housing discrimination will be enforced. The Town should also consider revoking any incentives provided to property managers or landlords who are charged with housing discrimination to the extent allowed by law. The Town could also provide recognition of landlords and property managers who demonstrate a commitment to providing equal access to housing.

Town government should also consider supporting the Freedom Team to leverage the larger Freedom Network into partnering with MCAD and the State Attorney General's Office to focus on three categories of discrimination complaints; workplace, housing, and public accommodations. The Freedom Network should also consider advocating on behalf of MCAD for additional resources to the Massachusetts Municipal Association's (MMA) policy committee on Municipal and Regional Administration, which drafts policy for MMA's legislative package of bills filed with state legislators. Staff complaints of unfair treatment should be addressed by the human resources department and/or anonymous channels, and standard grievance procedures.

3.3 Attract Diverse Businesses and Promote Diverse Talent

The Town's economic development department should explore how to attract diverse businesses and promote the Town's diversity of talent to staff local businesses. Strategies may include; business grant programs, interest free loan financing targeting minority owned enterprises, sponsoring internships by working with Wellesley School Committee and the METCO program, Wellesley colleges, MassHire, Charles River Chamber, Linden Square Retailers Association, and Wellesley Square Merchants Association. Sponsorship may include hosting hiring events that bring diverse talent and local

businesses together to network for job opportunities, as well as partnering with MassHire to provide interns to local businesses where MassHire pays interns and Town government matches funding. The Town should consider recognizing local businesses that demonstrate commitment to equal opportunity by disclosing their EEO-1 workforce demographics reports.

3.4 Enhance Accessibility to Town Meeting and Elected Officials

Finally, Town government should consider how to enhance the accessibility of town meeting and elected officials for all residents. Strategies may include focusing on educating residents on warrant articles using multimedia, offering free transportation and childcare, adding town meeting members email addresses to the current directory of town meeting members, hosting and providing assistance with identifying resident precincts on the town government website.

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POLICY RECOMMENDATIONS

Listed below are policies and practices REG recommends the Town to consider enacting. Policies can facilitate culture change and create a sense of urgency for all staff to promote equal opportunity and DEI. The policies as written may be modified as deemed appropriate. (numbers in parentheses align to strategic objectives).

POLICY NAME	POLICY ACTION	INTENDED OUTCOME
(1.1) Removing Barriers and Bias From Job descriptions:	<ul style="list-style-type: none"> All job descriptions shall use gender-neutral language; jobs with a minimum level of education as an entrance requirement must be reviewed by the Human Resources Department who will conduct a job analysis and determine that a particular level of education or experience is a valid business necessity. All hiring managers must consider the full set of competencies and skills that candidates can bring to the job beyond traditional education and experience. 	<ul style="list-style-type: none"> Avoids unnecessary barriers that are not a valid business necessity to perform the job, and bias that may unintentionally exclude talent.
(1.1) Job Postings that Promote Equal Opportunity:	<ul style="list-style-type: none"> All job postings will include additional equal opportunity commitment language. <i>Example: Alert: The Town of Wellesley is committed to an equal opportunity and inclusive workplace where all employees feel respected, valued, and empowered to serve our residents and stakeholders. Join us today! We encourage individuals from historically underrepresented groups to apply, including minorities, females, veterans, and persons with disabilities. The Town of Wellesley is an Equal Opportunity Employer and does not discriminate on the basis of race, religion, color, sex, gender identity or expression, sexual orientation, age, disability, national origin, veteran status, or any other basis covered by appropriate law.</i> 	<ul style="list-style-type: none"> Encourages and promotes equal opportunity. Generates an applicant pool reflective of the qualified available labor pool, in the Town's reasonable recruitment area.
(1.1) Reasonable Recruitment Time Frames:	<ul style="list-style-type: none"> For vacant positions, HR and/or the diversity officer will work with the hiring manager to determine an appropriate recruitment time frame to allow sufficient time to expand recruitment of underrepresented candidates, while not excluding any group based on protected classes, and also meeting the department's need to fill the position as soon as possible. 	<ul style="list-style-type: none"> Avoids hiring too fast just to fill the vacant position. Generates a more competitive pool of qualified candidates to select from.

POLICY NAME	POLICY ACTION	INTENDED OUTCOME
(1.1) Utilizing Staffing Agencies and Recruitment Firms:	<ul style="list-style-type: none"> Any staffing or recruitment firm that the Town engages for services is expected to include underrepresented candidates in the pool from which the hiring manager or committee selects candidates in a way that does not discriminate or violate federal state, or local discrimination laws. In evaluating the firms' performance and partnership, the Town will consider their ability to meet the expectations of this policy and the firms' own commitment to equal opportunity. 	<ul style="list-style-type: none"> Maximizes return on investment of taxpayer dollars for purchasing recruitment services.
(1.3) Standardizing Applicant Screening Criteria:	<ul style="list-style-type: none"> Applicant screening criteria will be based on minimum entrance requirements, special requirements, and the essential skills and subject matter knowledge an individual must possess to successfully do the job. The screening criteria should be based on competencies that generally are listed on the resume. All screeners should review resumes and cover letters for the same set of skills, and there will be more than one person to screen cover letters and resumes that are categorized into a yes, no, and maybe pool of candidates. When complete, screeners should review their results with the human resources director or diversity officer and determine who to invite for an interview. 	<ul style="list-style-type: none"> Minimizes selection bias and establishes an objective evaluation of all candidates based on the necessary job competencies.
(1.1) Equal Opportunity Candidate Pools:	<ul style="list-style-type: none"> Hiring managers, with support from HR must demonstrate good faith efforts to build diverse candidate slates reflective of the organization's designated available labor pool. Good faith efforts include outreach to underrepresented groups or organizations that serve and support underrepresented groups. HR will review the candidate slate benchmarked against the available labor pool. The recruitment and hiring process will only advance once it is determined that there is a diverse candidate slate available to interview, while not excluding any group based on protected classes. The hiring manager may request a waiver to proceed with the interview process in the absence of a diverse candidate slate. HR and the Select Board Office will evaluate the reasons for the waiver by the following: (1) demonstrated evidence of good faith efforts to comply with the diverse candidate slate policy; (2) job has been posted for 90 days and no qualified underrepresented candidate has applied or been identified by the hiring manager or recruitment personnel. (3) plan of action created by the hiring manager and HR to improve outreach efforts and qualified underrepresented talent to the candidate pool when a position within this job category is available in the future. 	<ul style="list-style-type: none"> Generates a more competitive pool of qualified candidates to select from, based on the validated benchmark of the available labor pool.

POLICY NAME	POLICY ACTION	INTENDED OUTCOME
(1.3) Interviewing, Hiring and Promotions Scoring Rubric	<ul style="list-style-type: none"> All hiring managers must use a scoring rubric template tool that defines clear criteria by which each candidate will be evaluated, including a scoring scale or range, description of the scoring range, and sample questions that demonstrate how to apply the scoring rubric. The tool should also include specific job competencies to evaluate, and an interview pass point on the scoring range. The pass point is the minimum score necessary to pass the interview. 	<ul style="list-style-type: none"> Evaluates candidates on objective measures rather than subjective. Defines expectations by which each candidate will be evaluated, including a scoring scale/range, description of the scoring range and sample questions that demonstrate how to apply the scoring rubric.
(1.2) Exit Interviews:	<ul style="list-style-type: none"> Once an employee provides notice of resignation, the immediate manager will inform human resources. Human resources will contact the employee to request an exit interview. There is no obligation for an employee to participate. They will have the option of doing the interview face-to-face or completing an online form. 	<ul style="list-style-type: none"> Measures and monitors talent retention with quantitative and qualitative data. Provides insights into organizational culture and impacts to employee engagement and productivity. Identifies trends or challenges that may affect talent retention

POLICY NAME	POLICY ACTION	INTENDED OUTCOME
(2.2) Forecasting bids and solicitation:	<ul style="list-style-type: none"> All Town purchasing personnel will solicit all bids and requests for proposals as far ahead as possible, preferably at least 12 weeks ahead of the due date. 	<ul style="list-style-type: none"> Provides sufficient time for smaller firms to prepare responses to solicitations.
(2.2) Bid and Solicitation Assistance:	<ul style="list-style-type: none"> The Town will provide supportive services such as technical assistance, vendors fairs and seminars (e.g. how to bid, how to register, how to become certified), obtaining bonding and credit, in advance of bid issuances periodically. 	<ul style="list-style-type: none"> Facilitates networking opportunities between prime and subcontractors. And provides equal access to procurement staff.
(2.2) Bid/Solicitation Postings:	<ul style="list-style-type: none"> All bids and solicitations will include additional equal opportunity commitment language. Example: <i>Alert: The Town of Wellesley is committed to doing business with all vendors, including diverse vendors and contractors. Come do business with us! The Town of Wellesley does not discriminate on the basis of race, religion, color, sex, gender identity or expression, sexual orientation, age, disability, national origin, veteran status, or any other protected class. Research suggests that firms owned by women, and people of color may choose not to bid in belief that larger and more familiar firms will receive an unfair preference. We encourage firms of all sizes who believe they can provide the requested goods and services to respond to this bid.</i> 	<ul style="list-style-type: none"> Encourages and promotes equal opportunity to do business with the Town. Generates a bidder pool reflective of the available vendor pool, in the Town's relevant market area.
(2.2) Monitor Contractor Commitment:	<ul style="list-style-type: none"> All Town purchasers will communicate to prime contractors in all solicitations the Town's aspirational goals (not quotas) and assistance in meeting those goals. Prime contractors must submit a proposed utilization of state certified MWBEs in bid submissions above \$50,000. While bids will not be rejected if a certain aspirational goal is not met, failures to adhere to the anti-discrimination policies, federal and state laws, including the Massachusetts General Law False Claims Act, may result in an investigation, financial penalties and rejection of a bid. The Town reserves the right to designate contractor, after an investigation as ineligible for future Town bid awards. The Town will track the contractor's commitment to good faith efforts using documentation completed by the contractor. The Town will validate with MWBEs the actual amount of utilization by prime contractors. 	<ul style="list-style-type: none"> Deters false claims of stated commitments to work with MWBEs and the actual outcomes of utilizing MWBEs. Expands equal opportunity to do business with the Town.

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POLICY NAME	POLICY ACTION	INTENDED OUTCOME
(2.1) Collecting Vendor MWBE Status:	<ul style="list-style-type: none"> All departments must complete the request for quotes form and document number of quotes obtained from MWBEs. When submitting a requisition for a new contract, departments must attach and submit the request for quotes form demonstrating outreach to MWBEs. Purchasing personnel will enter MWBE status of vendors for all new contracts in the electronic purchasing system (e.g. MUNIS). Prior to contract approval or distribution of any payments, vendor must provide a copy of their state certification letter. 	<ul style="list-style-type: none"> Obtains data for measuring and monitoring equal opportunity to do business with the Town.
(2.2) MWBE Utilization Plan:	<ul style="list-style-type: none"> All persons or entities submitting a proposal to enter into a contract for construction, design or engineering services, or the procurement of goods, supplies or services in excess of \$50,000 with the Town are required to submit with any such proposal an inclusionary participation plan containing the following elements: <ul style="list-style-type: none"> A report detailing the results achieved by the contractor over the prior two years to employ minorities and women, subcontract with businesses owned by minorities and women, joint venturing and other creative initiatives to increase the level of participation of minorities and women in employment and new business relationships. A plan detailing the efforts to be made by the proposer during the term of the proposed contract with the City to employ minorities and women, subcontract with businesses owned by minorities and women, joint venturing and other creative initiatives to increase the level of participation of minorities and women in employment and new business relationships. Bids will not be rejected if an aspirational goal is not met, but failures to adhere to the anti-discrimination policies, federal and state laws, including the Massachusetts False Claims Act, may result in an investigation, financial penalties and rejection of a bid. The City will track the contractor's commitment to good faith efforts using documentation completed by the contractor. The City will validate with MWBEs the actual amount of utilization by prime contractors. The City reserves the right to designate contractor as ineligible for future City bid awards. 	<ul style="list-style-type: none"> Promotes equal opportunity to participate in all City funded contracts. Builds capacity for increasing competition for awarding contracts by the City. Prevents vendors with a dominant market position from using their power to unfairly gain City contracts.

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Goods and Services (Ch. 30B)	Building Construction (Ch. 149, 44A-44J/ Ch. 30B)	Public Works (Ch. 30, Sec. 39M)	Design Services (Ch. 7C)
<p>Less than \$10,000: Sound business practices includes demonstrating good faith efforts to identify all business types, including minority and women business enterprises (MWBs) capable of providing the goods or services and selecting the best value.</p> <p>\$10,000–\$50,000: Solicit and obtain written quotes from a least three bidders. <i>Demonstrate good faith efforts to obtain quotes from MWBs.</i></p> <p>Over \$50,000: Post a notice at least four weeks before bids or proposals are due in (1) your jurisdiction's office, a (2) newspaper, 3) on COMMBUYS and external organizations that serve minority business enterprises (MWBs). <i>*Prime contractors must submit a proposed utilization plan of certified MWBs.</i></p>	<p>Less than \$10,000: Sound business practices includes demonstrating good faith efforts to identify minority business enterprises (MWBs) capable of providing the goods or services and selecting the best value.</p> <p>\$10,000–\$50,000: Solicit and obtain written quotes from a least three bidders. <i>Demonstrate good faith efforts to obtain quotes from MWBs.</i></p> <p>\$50,000–\$150,000: Post a notice at least four weeks before bids or proposals are due in (1) your jurisdiction's office, and publish at least four weeks before bids or proposals are due in a (2) newspaper, and 3) on COMMBUYS and external organizations that serve MBEs. <i>*Prime contractors must submit a proposed utilization plan of certified MWBs.</i></p> <p>Over \$150,000: Post a notice at least four weeks before bids or proposals are due in (1) your jurisdiction's office, a (2) newspaper, 3) on COMMBUYS and external organizations that serve DCAMM certified MBEs. <i>*Prime contractors must submit a proposed utilization plan of certified MWBs.</i></p>	<p>Less than \$10,000: Sound business practices includes demonstrating good faith efforts to identify minority business enterprises (MWBs) capable of providing the goods or services and selecting the best value.</p> <p>\$10,000–\$50,000: Solicit and obtain written quotes from a least three bidders. <i>Demonstrate good faith efforts to obtain quotes from MWBs.</i></p> <p>Over \$50,000: Post a notice at least four weeks before bids or proposals are due in (1) your jurisdiction's office, a (2) newspaper, 3) on COMMBUYS and external organizations that serve that serve MWBs. <i>*Prime contractors must submit a proposed utilization plan of certified MWBs.</i></p>	<p>Estimated Design Fee less than \$30,000 or Estimated Cost Construction less than \$300,000: Solicit and obtain written quotes from a least three bidders. <i>Demonstrate good faith efforts to obtain quotes from MWBs.</i></p> <p>Estimated Design Fee \$30,000 or more and Estimated Cost Construction \$300,000 or more:</p> <p>Post a notice at least four weeks before bids or proposals are due in (1) your jurisdiction's office, a (2) newspaper, 3) on COMMBUYS and external organizations that serve that serve MBEs. <i>*Prime contractors must submit a proposed utilization plan of certified MWBs.</i></p>

POLICY NAME	POLICY ACTION	INTENDED OUTCOME
(1.4) Benchmarking Representation	<ul style="list-style-type: none"> The Select Board Office will collect demographics of Town board and committee volunteers, and benchmark the representation of volunteers to the most recent Census population demographics of the Town, identifying any significant disparities or "inequities." The Town will address any inequities by evaluating board and committee volunteer barriers to participation and enact policies that promote equal opportunity to serve on all board and committees. 	<ul style="list-style-type: none"> Establishes a validated quantitative benchmark for measuring representation of volunteers and monitors if all voices in town are being heard prior to decision-making on Town policies, budgets, and programs. Defines expectations by which each candidate will be evaluated, including a scoring scale/range, description of the scoring range and sample questions that demonstrate how to apply the scoring rubric.
(3.0) Volunteer Training and Expectations:	<ul style="list-style-type: none"> All board and committee members are expected to become informed and knowledgeable of any quantitative or qualitative disparities that may infer discrimination, or demonstrate barriers to equal opportunity for all Town residents and stakeholders within the community and Town government departments, including; equal access to Town government employment and contracting opportunities; Town government services and programs; board and committee positions; and resident and stakeholder experiences within public accommodations, by collecting and/or obtaining data disaggregated by demographic group from Town staff or validated sources. The Town will provide all board and committee members with training to align with the Town's adopted Anti-Racism and Anti-Bias Statement, and civil rights and equal opportunity laws. 	<ul style="list-style-type: none"> Informs and equips board and committee volunteers with the necessary knowledge that for effective decision-making on Town policies, practices, budgets and programs. Provides insights into the needs of all residents and stakeholders. and understanding to shape belonging and inclusion for the entire town.

CONCLUSION

The Town has demonstrated initial good faith first steps to create an environment of equal opportunity within its operations and is building the organizational infrastructure necessary for advancing DEI throughout Town government. However, this gap and barrier analysis report has identified several areas where inequities exist and strategies to address them to ensure equal opportunity and belonging and inclusion for all stakeholders.


This report provides the Town with the necessary foundation and recommendations that the Town must decide how to prioritize and implement with existing capacity and priorities. REG has provided a recommended DEI action plan for the Town to utilize as a guide for immediate implementation, effective execution and long-term sustainability.

With identified baselines, knowledge of best practices, and understanding the Town's current state of DEI, the Town is positioned to continue its journey to successfully create a community that effectively promotes DEI and uses data to measure, monitor and manage equal opportunity, and belonging and inclusion for all residents and stakeholders.

On behalf of the Racial Equity Group, we appreciate the opportunity to partner with the Town of Wellesley, and the Town's DEI committee, who contributed to this report.

We look forward to observing the change in policies and practices that create environments of equal opportunity and belonging and inclusion for all staff, residents and stakeholders.

Bird Guess



CEO and President

Racial Equity Group

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BACKGROUND AND SCOPE

Wellesley is committed to achieving diversity within Town operations, programs and policy initiatives, and throughout the community. Through the development and implementation of a Diversity, Equity, and Inclusion (DEI) Task Force, the Town seeks to build on the community's stated values and to identify measurable actions that will help create an atmosphere of inclusion in which people of different backgrounds feel valued and have the opportunity to benefit from and contribute to economic prosperity.

According to the 2020 United States Census, Wellesley's population is approximately 29,550, including an estimated 5,000 people living in group quarters such as the dormitories at Wellesley College and Babson College. With a median household income of \$213,684, Wellesley has one of the highest median household incomes in the Commonwealth of Massachusetts.

Within the Town government of Wellesley, there are 27 departments and approximately 500 full-time and part-time municipal employees. The focus of this equity audit is on both the governmental and community aspects of town. The Wellesley Public Schools serves just over 4,000 students.

Wellesley is a community that highly values diversity, human dignity and respect for all individuals. In order to demonstrate Wellesley's commitment and help establish a more welcoming Town, the Select Board created the Wellesley DEI Initiative. The Town has identified the need to establish, implement, and support ongoing initiatives to make Wellesley a community that welcomes diversity, including demographic diversity among residents (race, ethnicity, ability, age), diversity in neighborhoods (housing, schools, open space), and commercial diversity. In 2019, the Town established a new Comprehensive Plan and Town-wide Strategic Plan known as the Wellesley Unified Plan which identifies diversity as a guiding principle and priority for implementation. The Unified Plan articulates the core values of the community; establishes a vision for the future of Wellesley; sets town-wide priorities and goals; and provides guidelines on strategies, tools, and specific actions to make the plan a reality. The plan includes a "Vision and Values Statement" for the next 20 years which illustrates Wellesley's desire to be recognized for its welcoming community culture.

In February 2021, the Town adopted an Anti-Racism and Anti-Bias Statement, to make it clear to residents that anti-racist and anti-bias values are values that the Select Board espouses and holds very strongly. Over the years, Wellesley has made strides to address diversity, equity, and inclusion. However, much more work needs to occur, building on past efforts and initiatives.

The racial demographics for the Town show that the majority of residents are White, and people of color are minorities. The following demographic data for residents of Wellesley (is disaggregated by race and ethnicity):

- Black or African American alone, 2 percent
- Asian alone, 14 percent
- Two or More Races, 9 percent
- Hispanic or Latino (of any race), 6 percent
- White alone, not Hispanic or Latino, 71.7 percent

Source: Census ACS Survey 2019-2023 ACS 5-year estimates, percentages may not add up to 100 because Hispanic residents can report being of one or more races.

This relative lack of racial diversity presents the biggest challenge to weaving diversity, inclusion, and equity into the fabric of the town.

The Select Board requested a DEI Committee and Task Force to be formed in December 2021, and included Town officials, and diverse community residents. In July 2023, the Town requested proposals to expand upon the Town's current DEI initiatives by conducting an equity audit and developing a comprehensive, meaningful DEI strategy for the Town of Wellesley based upon the findings of the equity audit.

With support from the Select Board, School Committee, and Town Meeting, the Wellesley DEI Task Force has determined that the Town should move forward with efforts to create, implement, and maintain a more equitable and inclusive Town. These efforts include identifying immediate actions as well as long-term systemic changes in order to actualize diversity, equity, and inclusion within Town government and the community

With respect to Town government, the desired deliverables included the following:

- To increase the diversity of the Town's workforce, boards, and committees;
- To deliver services in an equitable, caring, fair, and inclusive manner;
- To increase cultural responsiveness and build excellence in communication and customer service for everyone in Wellesley, regardless of race, ethnicity, gender, sexual orientation, age, disability, or any other factor;
- To work with all departments to build support for DEI and to integrate DEI into decision making, policies, practices, procedures, and services

With respect to the community, the desired deliverables included the following:

- To institutionalize equity, while reinforcing inclusion and affirming diverse identities and experiences;
- To support victims of hate and bias, foster respect, and celebrate differences;
- To build more meaningful engagement with those whose input has historically been at the margins; and
- To provide better access for people who speak a language other than English or have disabilities.

In October 2023, the Town awarded Racial Equity Group (REG) the contract to assist the Town in achieving the above objectives and deliverables. REG's framework and approach included the following:

- Facilitated a series of foundational **DEI training sessions** for the Select Board Office, and department leaders to develop a shared understanding and language regarding DEI terminology and concepts.
- Administered a **DEI audit assessment** to measure the Town's level of commitment based on DEI best practices and to establish a baseline and benchmark for measuring staff perceptions on the Town's commitment to DEI.
- Conducted **focus groups interviews with residents and stakeholders** to understand their lived experiences related to DEI and to collect feedback and ideas on how to make the Town more inclusive and a community where all residents have a sense of belonging.

- Administered a **community wide convenience sampling survey** to gain insights if residents and stakeholders have equitable access to Town services, programs, jobs and contracts, are treated fairly by Town staff, and receive quality services and programs.
- Conducted **disparity and inequity representation analysis** within employment, purchasing and procurement, services and programs, boards and committees, to identify any significant disparities or “inequities” within representation for a particular demographic group.
- Conducted a **best practices gap and barrier analysis** by evaluating City current policies and practices benchmarked against evidenced-based best practices for advancing equal opportunity within employment, purchasing and procurement, services and programs, and boards and committees.

This entire audit and resulting report was voluntarily requested as a reaffirmation of commitment to equal opportunity throughout Town operations and are not admissions that any demographic group is subjected to discrimination in any way, or in violation of federal, state or local laws.

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METHODOLOGY

REG's diversity, equity and inclusion mindset framework was developed using evidenced based research data from the Equal Employment Opportunity Commission's (EEOC) demographic census of workplace establishments, Harvard social scientist, Frank Dobbin's retrospective survey characteristics of diversity training programs, experience and observations of client efforts and actions. This research data involved surveying over 800 of the organizations covered in the EEOC's massive data file, putting together a life history of diversity practices for each organization. Statistical analyses were conducted on 829 firms over 40 years and provided valid and reliable data points that were able to be replicated. Our framework also includes guidance from federal agencies including the EEOC (Equal Employment Opportunity Commission) and the OFCCP (Office of Federal Contract Compliance. This cumulative expertise equipped our firm with a unique framework of best practices for advancing DEI within public and private sector organizations

Gap and Barrier Analysis

The gap and barrier analyses commenced with a [disparity analysis](#), a process of analyzing demographic group data to identify significant disparities, or "inequities." This approach included performing statistical analyses to benchmark the Town's workforce representation against the Town's relevant labor force, which is the available qualified workforce in the Town's reasonable recruitment area for the job groups found within Town government departments. The analysis examined disaggregated data and investigated inequities between the expected and actual representation rates in the workforce from three key phases of the Town's employment life cycle: hiring, promotions, and retention. If inequities are found, it indicates that employment representation or the presence and participation of a demographic group, is significantly underrepresented based on a demographic group's availability for employment within local government, and the inequities or outcomes found are not likely due to chance alone, but may be indicative of other underlying reasons; including employment discrimination, biases and barriers to equal opportunity. REG also conducted a [disparity analysis for procurement, services and programs, and representation on boards and committees](#).

REG performed the disparity analyses within the following four DEI domains, where inequities are typically produced and sustained, and identified any inequities, often occurring unintentionally by public and private sector organizations:

- Employment (hiring, promotions, retention)
- Service Delivery and Programs (access, quality, treatment)
- Purchasing and Procurement
- Stakeholder and Community Engagement (board/committee representation)

REG also determined if best practices for advancing DEI were present and effective within the above four domains and within Town government core operations. Following the disparity analysis to identify any inequities in representation and gaps in best practices, REG performed a [barrier analysis](#) which is a process that involves reviewing Town policies and practices to investigate if barriers exist that may be unintentionally influencing or contributing to any inequities detected. Relevant data and materials provided by the Town, as well as ideas and input from staff were reviewed and analyzed to uncover potential barriers. Once all analyses were performed, REG synthesized data from the audit assessment, gap and barrier analysis, previous DEI data and reports. The key findings detailed within this report are based on quantitative and qualitative analytic results. REG then used the data to draw conclusions, document key issues, and develop recommendations to help advance DEI within Town government.

DEI ADUIT ASSESSMENT HIGHLIGHTS

REG conducted the inaugural Diversity, Equity and Inclusion (DEI) Audit Assessment in June 2024. The assessment was administered through an online survey intended for all employees who work for Town government, except Wellesley Public Schools personnel.

The purpose of the survey was to determine the following:

- Establish a baseline to measure Town government's commitment to DEI and staff's perception of that commitment.
- Identify more effective approaches for ensuring equal opportunity for all staff.
- Identify potential training needed to support staff and leadership for advancing DEI.

DEI for the Town government of Wellesley was defined as:

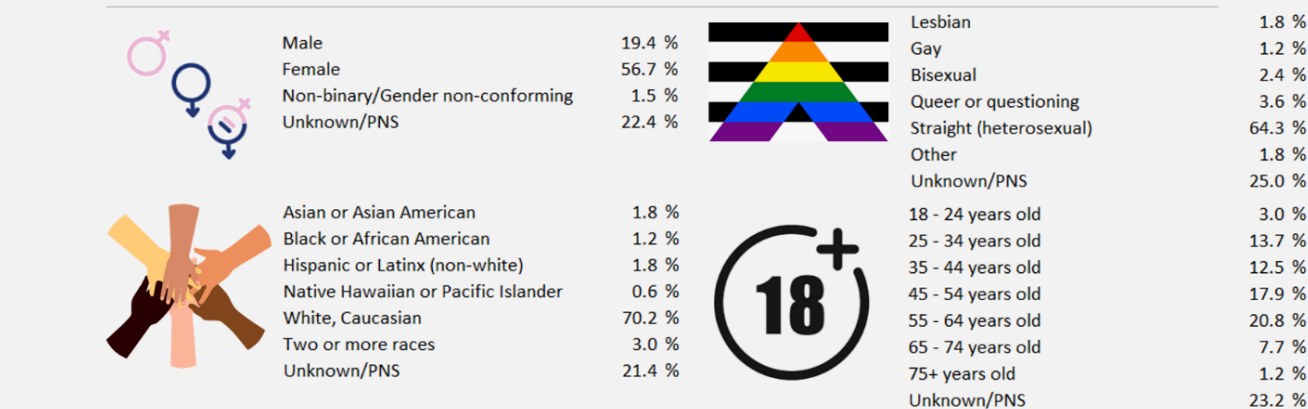
- **Diversity:** equitable representation of employees, vendors and contractors from different demographic groups, including race/ethnicity, gender, age, sexual orientation and other diverse backgrounds and identities.
- **Equity:** barriers contributing to inequities are identified and removed to promote equal opportunity within employment, purchasing and procurement, and boards and committees
- **Inclusion:** employee's perspectives and ideas are solicited, valued and respected to inform decision-making, regardless of race/ethnicity, gender, age, sexual orientation or other diverse backgrounds and identities.

Between May 14th 2024 and June 21st 2024, 500 Wellesley staff members were invited to complete the DEI audit assessment via direct email links. A minimum recommended sample size of 176 was calculated for a 90% confidence level and 5% margin of error. 191 responses were received. The data cleaning process administers a standardized process to retain high quality responses for analysis by flagging circumstances that may indicate lower quality responses (completing too quickly, completing too slowly, no variance in responses, partial completion). Following this process, the Town's valid response rate was 88% of the initial 191 responses retained as valid cases (N = 168) per the parameters of identifying quality responses. This rate of valid responses is excellent and the survey reflects a valid sample of the Town of Wellesley staff.

The target threshold for a valid sample was 25% of staff (125 respondents) for analysis. This 25% threshold was exceeded as 168 valid surveys were identified for inclusion in the analysis (134.4% of established threshold). Approximately 20%-25% of valid respondents chose not to include identifying information such as gender, orientation, race/ethnicity, and age. These frequencies are comparable to rates of unknown identity factors from other communities. Individuals may withhold this information for a variety of reasons across the spectrum of beliefs and identity politics.

The following page provides a highlight of key findings from the audit assessment survey and is the foundational first step to advancing DEI. The assessment measures the most important competencies and actions for producing and sustaining DEI within the Town of Wellesley.

Demographics of survey respondents (n= 168)



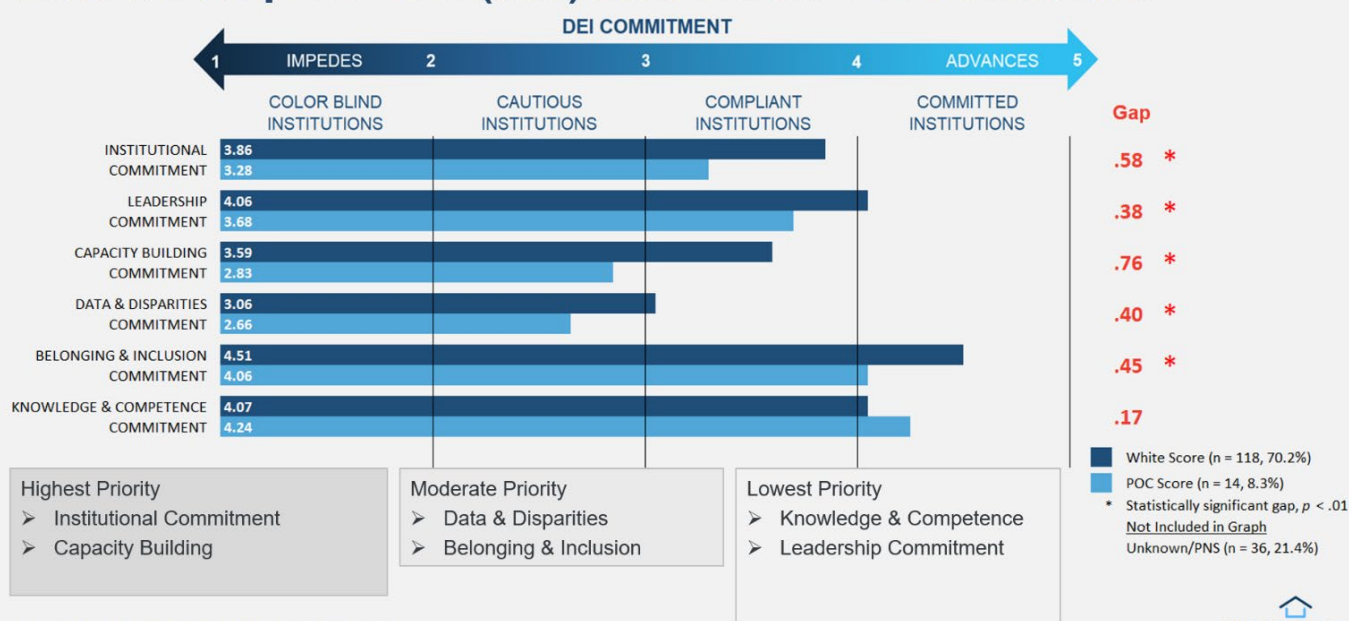
Note: Demographic characteristic percentages calculated as the number in the group divided by the valid responses (N = 168); For example, 56.7% of the valid response sample was Female.
PNS = Prefer Not to Say; Unknown/PNS respondents are not included in further analyses comparing demographic groups, such as White/POC.
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Racial Equity Group

The results of the audit assessment illustrated the Town's strongest DEI competency is knowledge and competence commitment, which indicates employees understand what DEI looks like in daily operations, can identify examples of biases, and feel comfortable talking about DEI within the workplace. The Town can leverage this strength as it begins to prioritize development in the remaining five core competencies; with an immediate focus on capacity building and institutional commitment which displayed the largest statistically significant gaps between employees who identify as people of color and White employees.

Aggregate levels of DEI Commitment can be blind spots for organizations. In order to truly apply a DEI mindset requires disaggregating data to focus on the racial consensus gap between White employees and employees of color (POC), which has revealed that Town of Wellesley has an actual DEI score of not 3.86 (aggregate score), but 3.58 (disaggregated racial consensus score).

White and People of Color (POC) Consensus on DEI Commitment

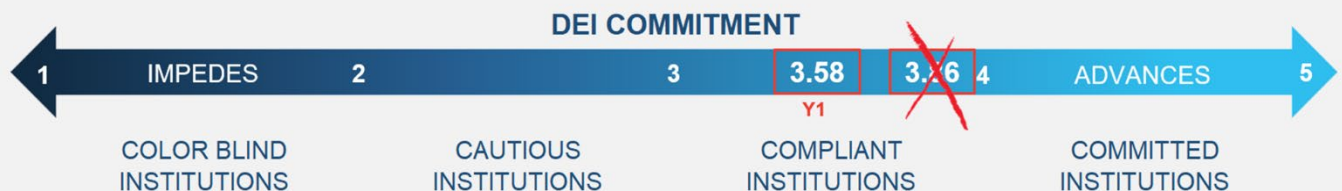


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Racial Equity Group

The road to becoming an institution committed to equal opportunity and DEI for the Town of Wellesley will require decreasing the gap between White and people of color scores to a difference below .20 (Current Gap = .29; see appendix full report) as well as achieving an overall score of at least 3.75.

The current results of the DEI audit assessment identifies the Town on the below continuum as compliant in year one, (Y1) the initial baseline year. Compliant institutions issue public statements or resolutions committing to DEI in principle, but do not collect, monitor, evaluate, or disaggregate data by race/ethnicity in their core operations. Compliant institutions conduct DEI training and activities in response to discriminatory events (e.g. George Floyd), legal compliance or emerging risks, but DEI has not become operationalized within the core operations of the organization.



Additional questions not included in the DEI commitment score were asked regarding witnessing or experiencing situations of discrimination on a scale of “Never, Rarely, Sometimes, Often, Don’t Know.” The questions asked were:

- I have witnessed or experienced situations where the Town didn’t treat employees fairly due to factors such as their race, gender, sexual orientation, age, disability, or other identities.
 - 43% of staff who identified as people of color indicated rarely to often witnessing or experiencing these situations. 29% of staff of color reported never witnessing or experiencing these situations.
 - 31% of White staff indicated they rarely to often witness or experience these situations, while 55% of White staff reported never witnessing or experiencing these situations.
- I have witnessed or experienced situations where an employee’s ideas or perspectives were not valued or considered due to factors such as their race, gender, age, sexual orientation, disability, or other identities.
 - 43% of staff who identified as people of color indicated they rarely to often witness or experience these situations. Staff of color who reported never witnessing or experiencing these situations was also 43%.
 - 31% of White staff indicated they rarely to often witness or experience these situations, while 61% of White staff reported never witnessing or experiencing these situations.

Percentages total less than 100% due to respondents who chose not to answer these items.

The level of staff experiencing unfair treatment and lack of inclusion in the workplace, based on social identity is alarming and should immediately be addressed by the human resources and Select Board Office.

EMPLOYMENT AVAILABILITY ANALYSIS RESULTS

REG determined the [reasonable recruitment area](#) for the Town as the geographical area including Massachusetts' cities and counties where significant amounts of Town employees and applicants reside and/or the Town could reasonably seek workers with the requisite skills to fill open job positions. The following Massachusetts counties were determined to be [the Town's reasonable recruitment area](#): Suffolk, Middlesex, Essex, Norfolk, Plymouth, Bristol, and Worcester counties. When selecting the reasonable recruitment area, it is important not to select an area in such a way that it would unintentionally exclude diverse groups. The average commute time for the State of Massachusetts and the Boston metro area, including peer cities was 30 minutes each way. However, potential employee applicants may reasonably commute to the Town up to 60 minutes each way, which resulted in the identified six counties.

After identifying the reasonable recruitment area, REG conducted an *availability analysis*. "Availability" is an estimate of the proportion of each race/ethnic group available and qualified for employment within the Town for a given job group in the reasonable recruitment area. Availability indicates the approximate level at which each race/ethnic group could reasonably be expected to be represented in a job group within the Town. REG examined the availability of diverse talent for Town employment to use as benchmarks against which to compare the actual representation of talent based on race/ethnicity and gender for Town jobs. Comparisons between representation and availability enabled REG to determine whether certain racial or gender groups are underrepresented relative to their availability for Town employment.

Figure 1. Overall Availability Estimates by Race/Ethnicity and Gender

Data is composite of EEOC job group categories table (EEOALL6R) Officials/Administrators, Professionals, Technicians, Protective service: Sworn and Non-sworn, Administrative support, Skilled Craft, Service/Maintenance within the following Massachusetts counties; Suffolk, Middlesex, Essex, Norfolk, Plymouth, Bristol, and Worcester. Source 2018 Census (most recent) American Community Survey 5-Year Estimates Equal Employment Opportunity (see appendix for more information)

Racial/Ethnic Group	Total Availability Metro Counties
Hispanic or Latino	10.1%
White, non-Hispanic or Latino	73.4%
Black or African American	7.0%
Asian American	7.0%
2 or more races or some other race	2.5%

Overall, the availability of people of color for Town jobs is 26.4 percent, indicating that qualified people of color might be expected to fill about **26.4 percent** of various job positions within Town government.

Employment Representation Analysis Results

REG attempted to measure the current representation of the Town's entire workforce by race/ethnicity and gender using internal documentation (EEO-4 reports) provided by the Town and are required for state and local governments with 100 or more employees to be submitted biennially to the Equal Employment Opportunity Commission, a federal agency responsible for enforcing federal laws that make it illegal to discriminate against a job applicant or an employee because of the person's race,

color, religion, sex, gender identity, sexual orientation, national origin, age, disability or genetic information. Figure 2 below, shows the Town's overall representation using the most recent EEO-4 data (2023) supplied by the Town.

Figure 2. Benchmarking Town of Wellesley Current Workforce Representation

Racial/Ethnic Group	Availability Metro Counties	Wellesley Workforce
Hispanic or Latino	10.1%	5.5%
White	73.4%	90.1%
Black or African American	7.0%	2.0%
Asian American	7.0%	2.3%
2 or more races/ other race	2.5%	0.0%

Note: Town of Wellesley Census; 71.7% White, 6% Hispanic, 2% Black, 14% Asian, 9% Two or more races.

Source: ACS Survey 2021, 5-year Estimates racial demographics.

REG also examined representation analysis results by Town job group/category. In order to conduct meaningful representation workforce analyses, Town employees must first be grouped by occupational duties into segments having broad similarities. These macro-groupings, called EEO state and local government categories, are defined in the EEO-4 Report issued by the Equal Employment Opportunity Commission. The job categories are the following:

- Officials and Administrators
- Professionals
- Technicians
- Protected Service Workers (Sworn and non-Sworn)
- Office and Clerical Workers
- Skilled Craft Workers
- Service Maintenance Workers

The Census Bureau produces the EEO Tabulation 2014-2018 (most recent 5-year ACS data) for Federal agencies responsible for monitoring employment practices and enforcing civil rights laws in the workforce, and for all employers so they can measure their compliance with the laws. The EEO Tabulation 2014-2018 (5-year ACS data) serves as the primary external benchmark for conducting comparisons between the racial, ethnic, and sex composition of each employer's workforce to its available labor market.

The following four agencies sponsor this tabulation:

- Equal Employment Opportunity Commission (EEOC)
- Department of Justice's Employment Litigation Section of the Civil Rights Division (DOJ)
- Department of Labor's Office of Federal Contract Compliance Programs (OFCCP)
- Office of Personnel Management (OPM)

EEO Job Category *	Availability Metro Counties						
	Male	Female	Hispanic	White	Black	Asian	2 or more races
Officials and Administrators	55.3%	44.7%	5.0%	82.3%	4.2%	6.9%	1.6%
Professionals	44.7%	55.3%	5.2%	77.1%	4.9%	10.7%	2.0%
Technicians	50.3%	49.7%	14.0%	64.8%	8.8%	9.7%	2.6%
Protected Service Workers (Sworn and non-Sworn)	82.2%	17.8%	9.2%	76.6%	11.6%	0.1%	2.5%
Office and Clerical Workers	37.9%	62.1%	8.9%	76.6%	7.0%	5.1%	2.3%
Skilled Craft Workers	92.5%	7.5%	12.2%	77.1%	4.5%	3.7%	2.5%
Service Maintenance Workers	54.1%	45.9%	19.3%	60.3%	11.3%	5.3%	3.8%

Figure 3. Benchmarking Town of Wellesley Representation by Job Group *Job Group Category definitions are located in the Appendix

EEO Job Category *	Wellesley Workforce Representation						
	Male	Female	Hispanic	White	Black	Asian	2 or more races
Officials and Administrators	69.8%	30.2%	0.0%	95.3%	0.0%	4.7%	0.0%
Professionals	53.0%	47.0%	4.5%	92.4%	0.0%	3.0%	0.0%
Technicians	100.0%	0.0%	12.5%	87.5%	0.0%	0.0%	0.0%
Protected Service Workers (Sworn and non-Sworn)	83.0%	17.0%	2.1%	93.6%	4.3%	0.0%	0.0%
Office and Clerical Workers	30.4%	69.6%	1.3%	12.7%	1.3%	3.8%	0.0%
Skilled Craft Workers	98.1%	1.9%	13.0%	83.3%	1.9%	1.9%	0.0%
Service Maintenance Workers	93.8%	6.3%	0.0%	100.0%	0.0%	0.0%	0.0%

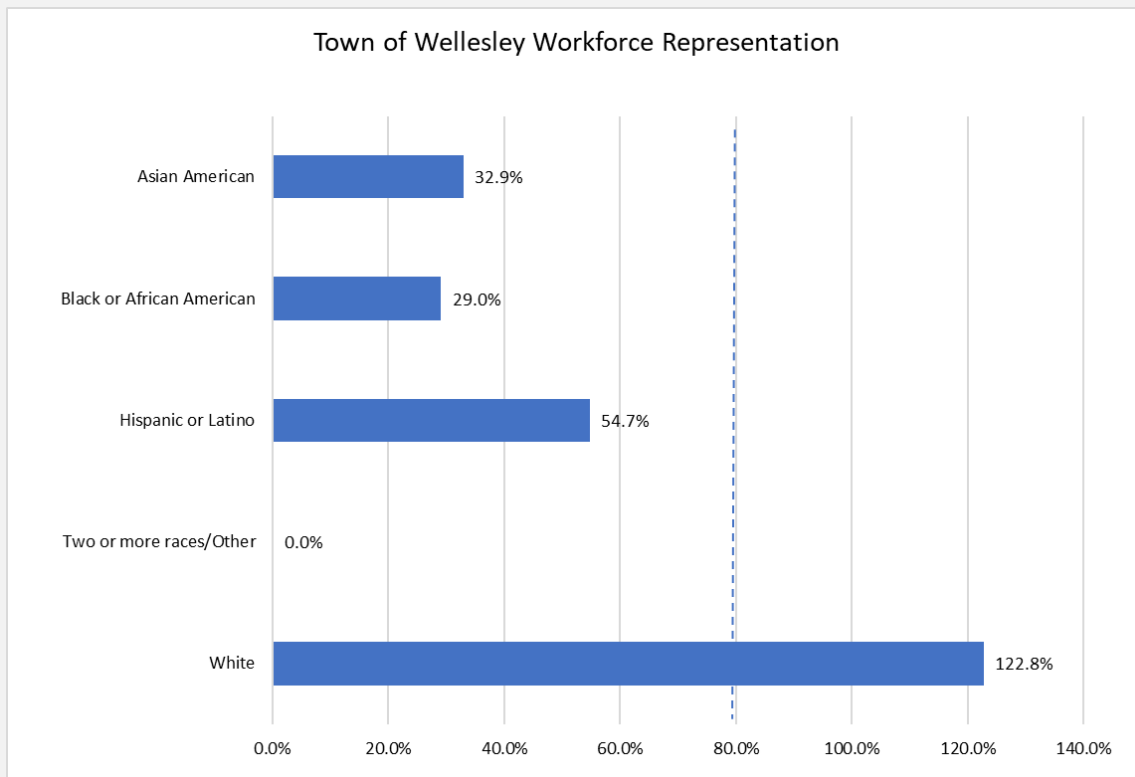
EMPLOYMENT DISPARITY ANALYSIS RESULTS

Although information about the overall representation of employees and representation by job group can be insightful alone, it can be more insightful when the data is compared with the level of representation one might expect based on their availability for that work. As part of the DEI disparity analysis, REG attempted to compare the racial and gender demographic representation of staff employed by the Town overall and by job group, to the percentage of workers that could potentially be hired based on their availability for that work. REG calculated disparity indices for each group based on race/ethnicity and gender for job groups by using the following formula: dividing percent of representation by percent availability and multiplying by 100.

$$\frac{\% \text{ participation}}{\% \text{ availability}} \times 100$$

A disparity index of 100 indicates an exact match between representation and availability for a particular group overall, and for a particular job category, also called parity or achieving equitable outcomes. An index score of less than 100 indicates a disparity between representation and availability. A disparity index of less than 80 indicates a significant disparity between representation and availability and would trigger racial or gender inequity. Figure 4 on the following page presents disparity indices for overall representation of Town employees during the analysis study period of 2023. The line down the center of the graph shows a disparity index level of 100, which indicates parity or representation is equal to availability. A line is also drawn at a disparity index level of 80, which indicates a significant disparity or inequity. As shown in Figure 4, people of color exhibited a disparity index below 80 for overall employment representation during the analysis period, indicating significant underrepresentation and racial inequities for those groups. White employees are overrepresented by 23 percent, based on their availability in the labor market.

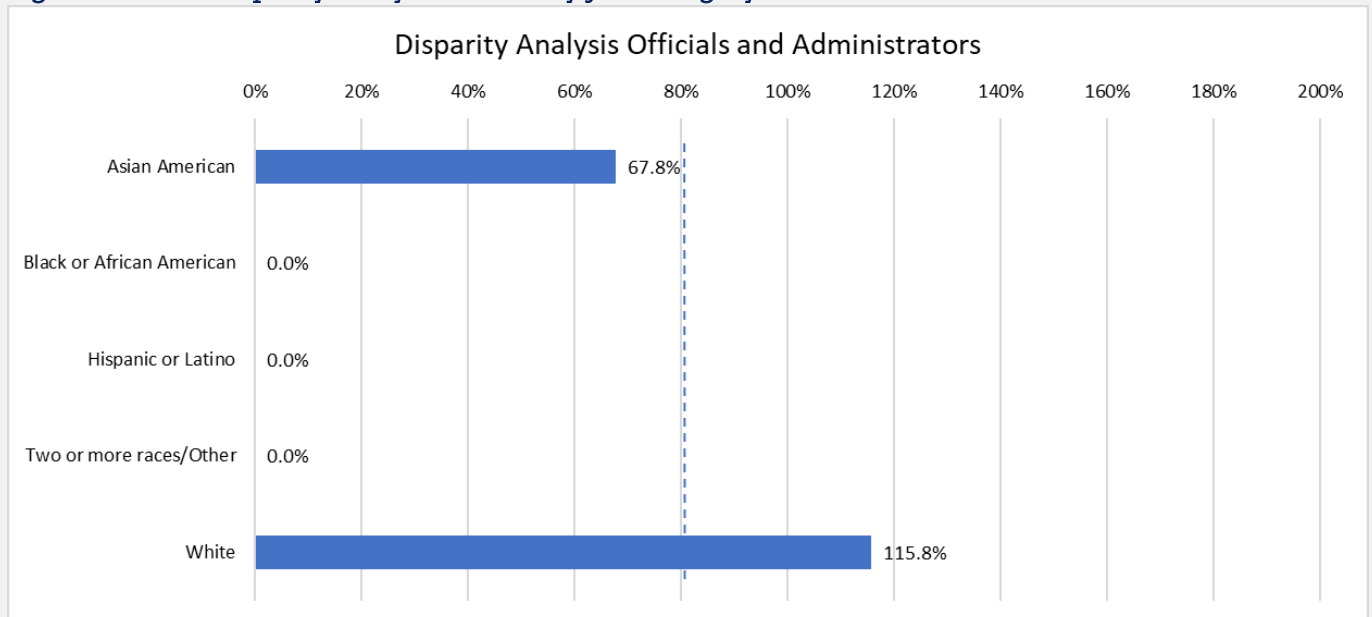
Figure 4. Racial Disparity Analysis Results for Overall Workforce Representation



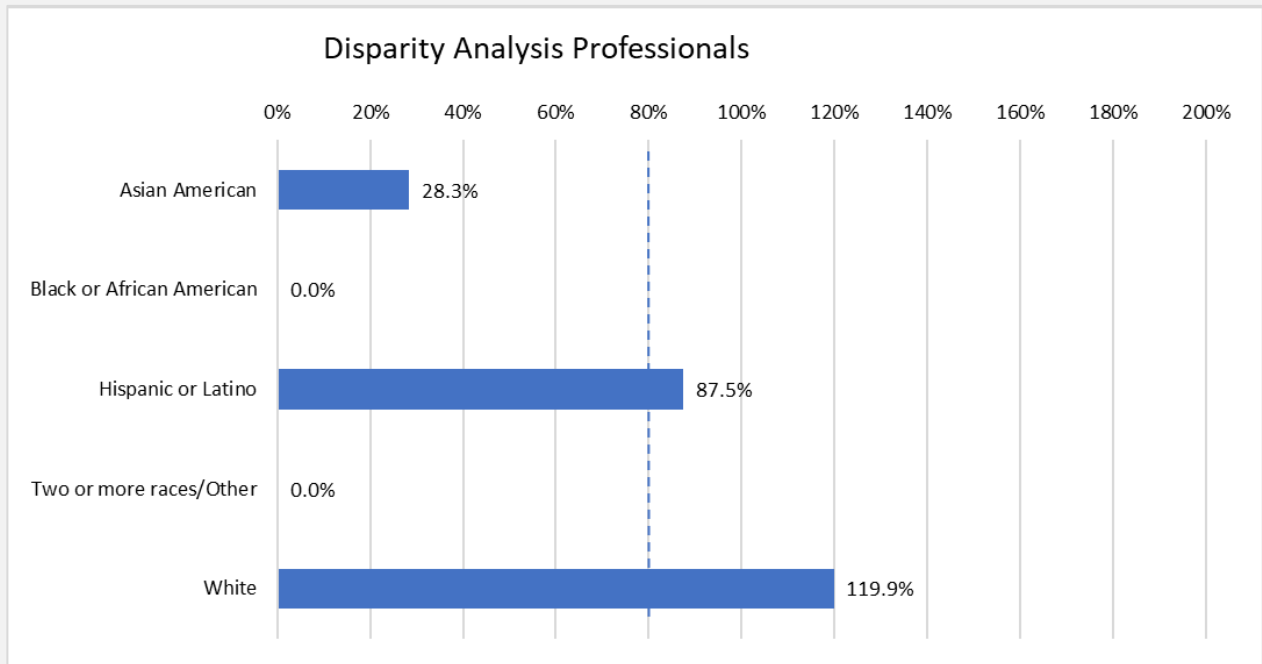
Once final availability estimates were determined overall, REG attempted to determine availability by each job group and compared the representation of incumbents (current Town workforce by race/ethnicity and gender) in each of the seven job groups to their corresponding availability in the labor market. As shown in Figure 5 on the following pages.

- White employees are overrepresented by 16 percent for Officials and Administrators, based on availability. People of color are significantly underrepresented within Officials and Administrators, triggering racial inequities.
- For Professionals, Asians, Blacks and Two or more races are significantly underrepresented triggering racial inequities. Hispanics are marginally close to being significantly underrepresented. White employees are slightly overrepresented by 20 percent.
- Regarding the job category of Technicians, Hispanics are marginally close to being significantly underrepresented. Black, Asian, and Two or more races, are significantly underrepresented triggering racial inequities. Whites are overrepresented by 35 percent.
- For Protective sworn and non-sworn service positions, people of color are significantly underrepresented triggering racial inequities.
- Whites are slightly overrepresented by 22 percent. Only three racial/ethnic groups, Blacks, Asians, and Two or more races, displayed racial inequities for Office and Clerical positions. Hispanics and Whites were near parity.
- For Skilled Craft positions, Blacks, Asians and Two or more races are significantly underrepresented and below the 80 percent threshold, triggering racial inequities. Hispanics and Whites are near parity.
- Finally for Service Maintenance job positions, White employees are overrepresented by 66 percent. People of color are significantly underrepresented, triggering racial inequities.

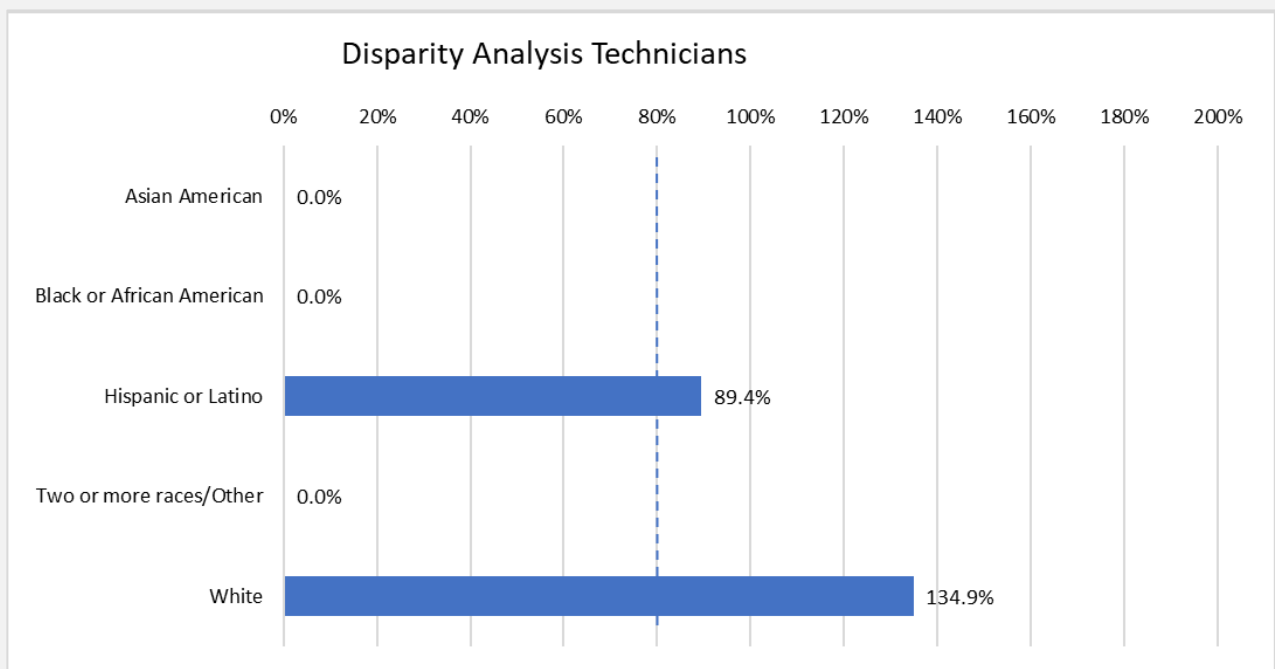
Figure 5. Racial Disparity Analysis Results by Job Category



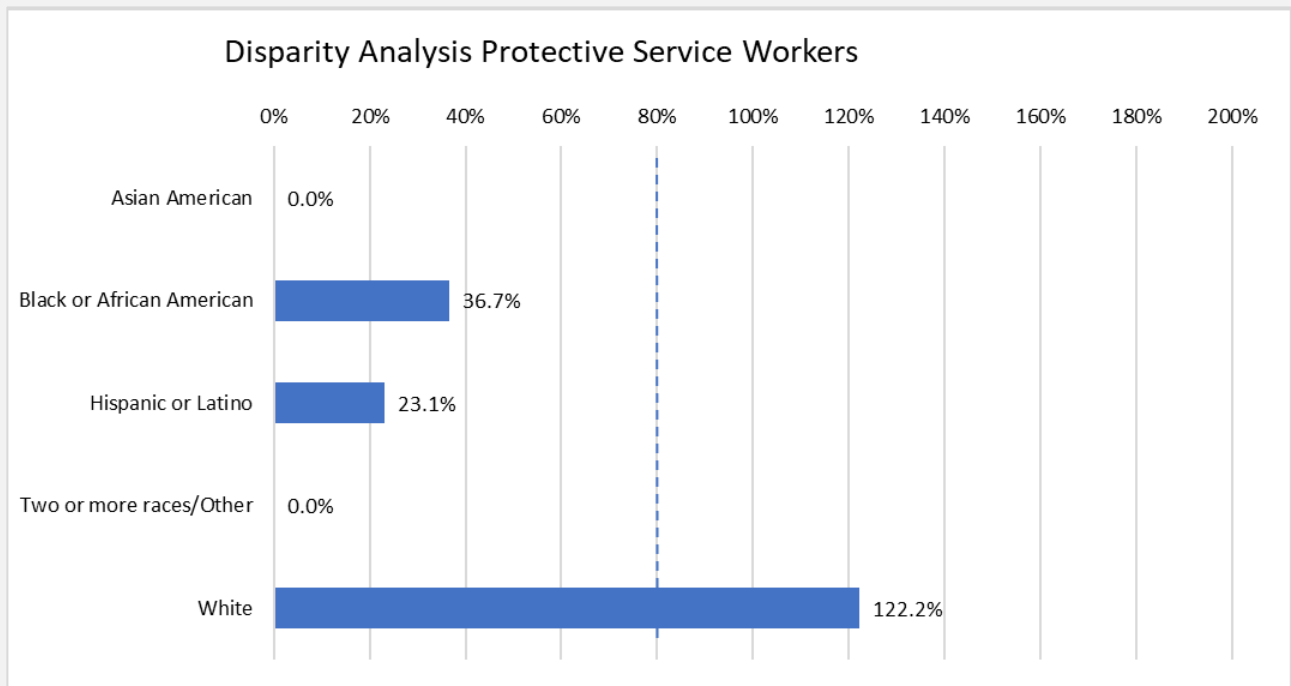
Officials and Administrators: Occupations in which employees set broad policies, exercise overall responsibility for execution of these policies, direct individual departments or special phases of the agency's operations, or provide specialized consultation on a regional, district or area basis. Includes: department heads, bureau chiefs, division chiefs, directors, deputy directors, controllers, wardens, superintendents, sheriffs, police, and fire chiefs.



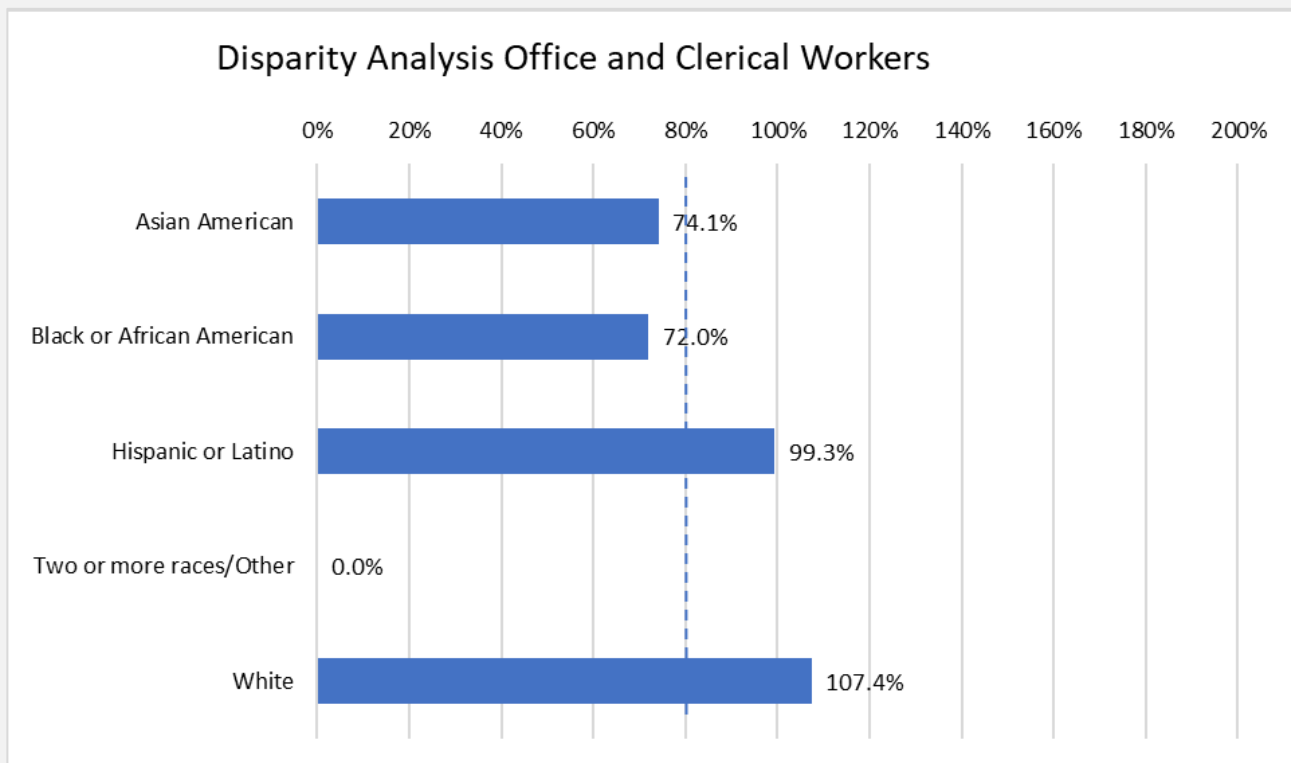
Professionals: Occupations which require specialized and theoretical knowledge which is usually acquired through college training or through work experience and other training which provides comparable knowledge. Includes: personnel and labor relations workers, social workers, doctors, psychologists, registered nurses, economists, dietitians, lawyers, systems analysts, accountants, engineers.



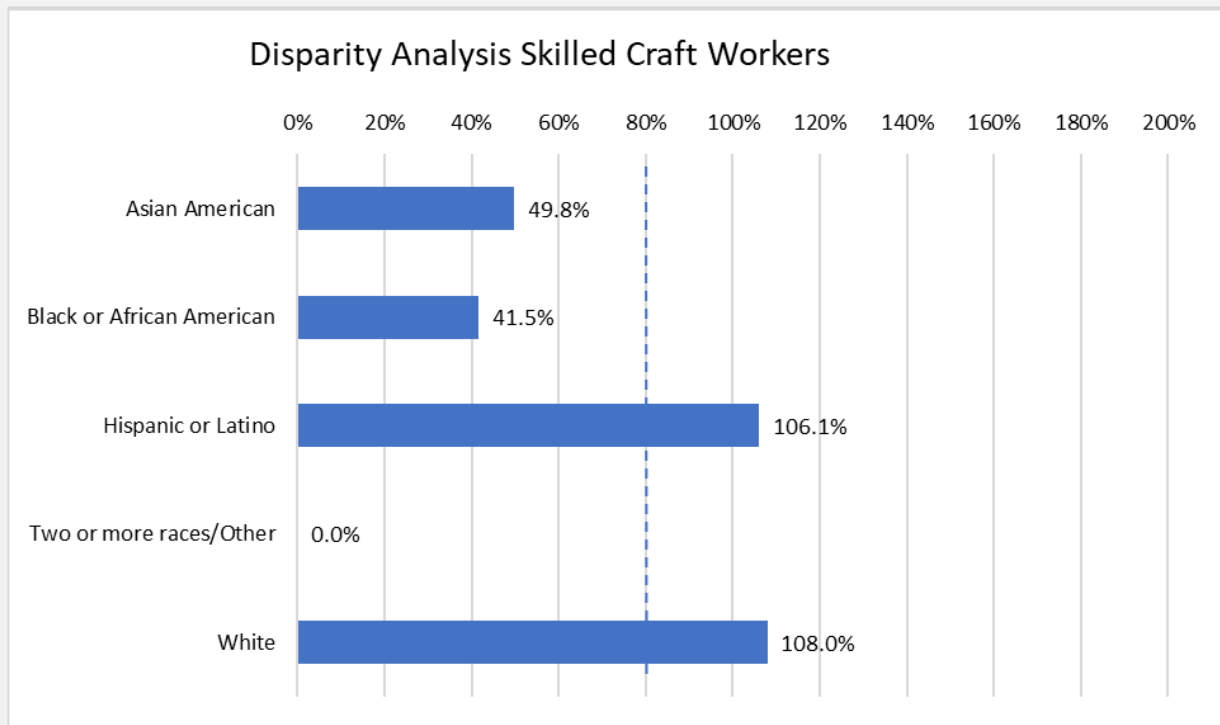
Technicians: Occupations which require a combination of basic scientific or technical knowledge and manual skill which can be obtained through specialized post-secondary school education or through equivalent on-the-job training



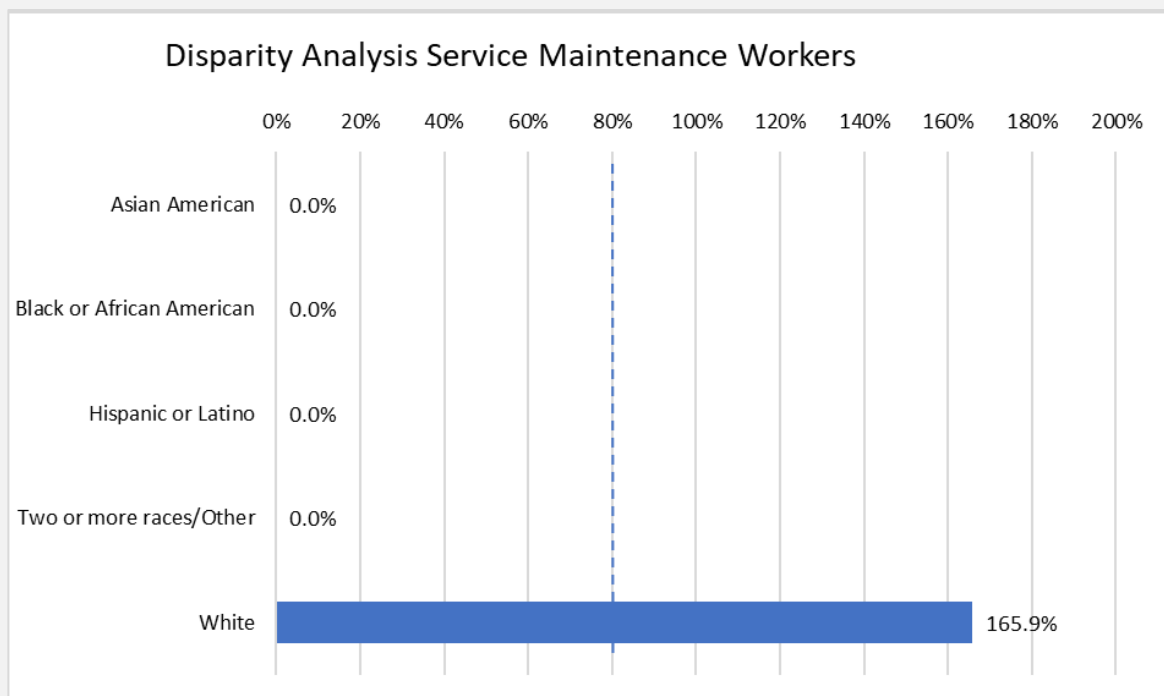
Protective Service (Sworn and Non-Sworn): Occupations in which workers are entrusted with public safety, security and protection from destructive forces. Includes: police patrol officers, firefighters, guards, deputy sheriffs, bailiffs, correctional officers, detectives, marshals, harbor patrol officers, game and fish wardens, park rangers.



Administrative Support: Occupations in which workers are responsible for internal and external communication, recording and retrieval of data and/or information and other paperwork required in an office.



Skilled Craft: Occupations in which workers perform jobs which require special manual skill and a thorough and comprehensive knowledge of the process involved in the work which is acquired through on-the-job training and experience or through apprenticeship or other formal training programs. Includes: mechanics and repairers, electricians, heavy equipment operators, stationary engineers, skilled machining occupations, carpenters.

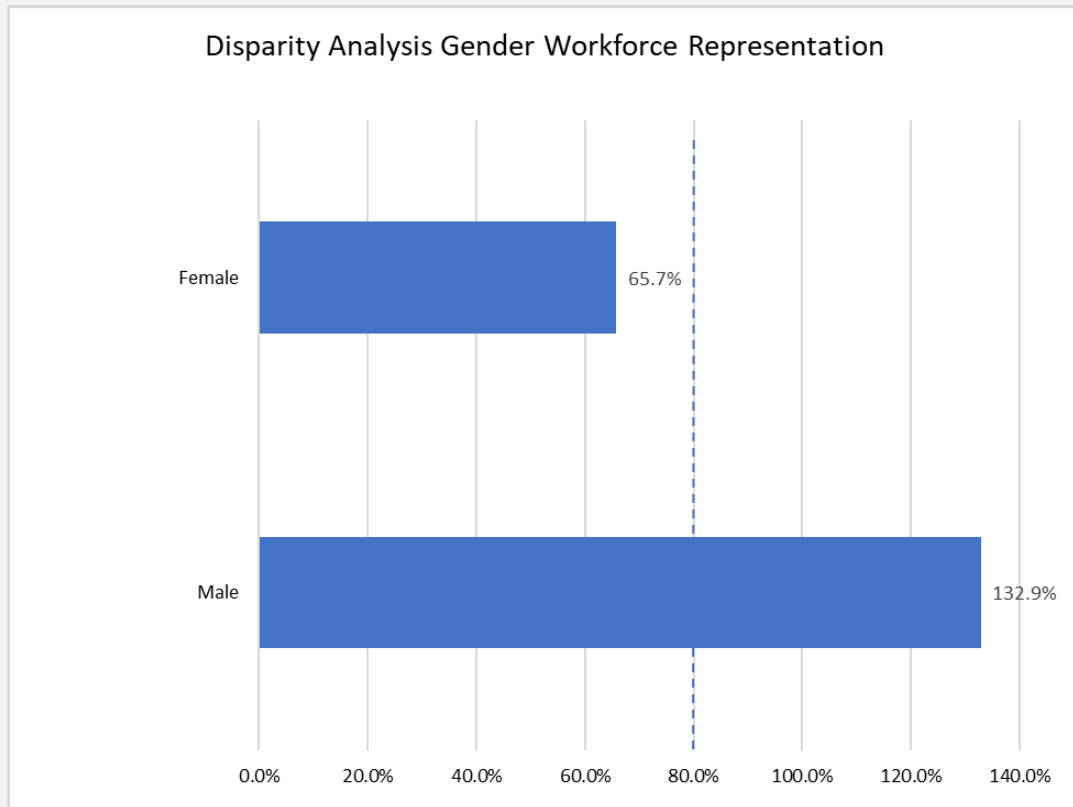


Service Maintenance: Occupations in which workers perform duties which result in or contribute to the comfort, convenience, hygiene or safety of the general public or which contribute to the upkeep and care of buildings, facilities or grounds of public property.

Gender Disparities and Inequities

REG also conducted disparity analysis for gender (females vs males) within the Town's overall workforce representation. In Figure 6 below, we observe **men are overrepresented by 33 percent** and **women are below the 80 percent threshold at 66 percent**, and **significantly underrepresented** triggering gender inequities.

Figure 6. Gender Disparity Analysis Town of Wellesley Workforce

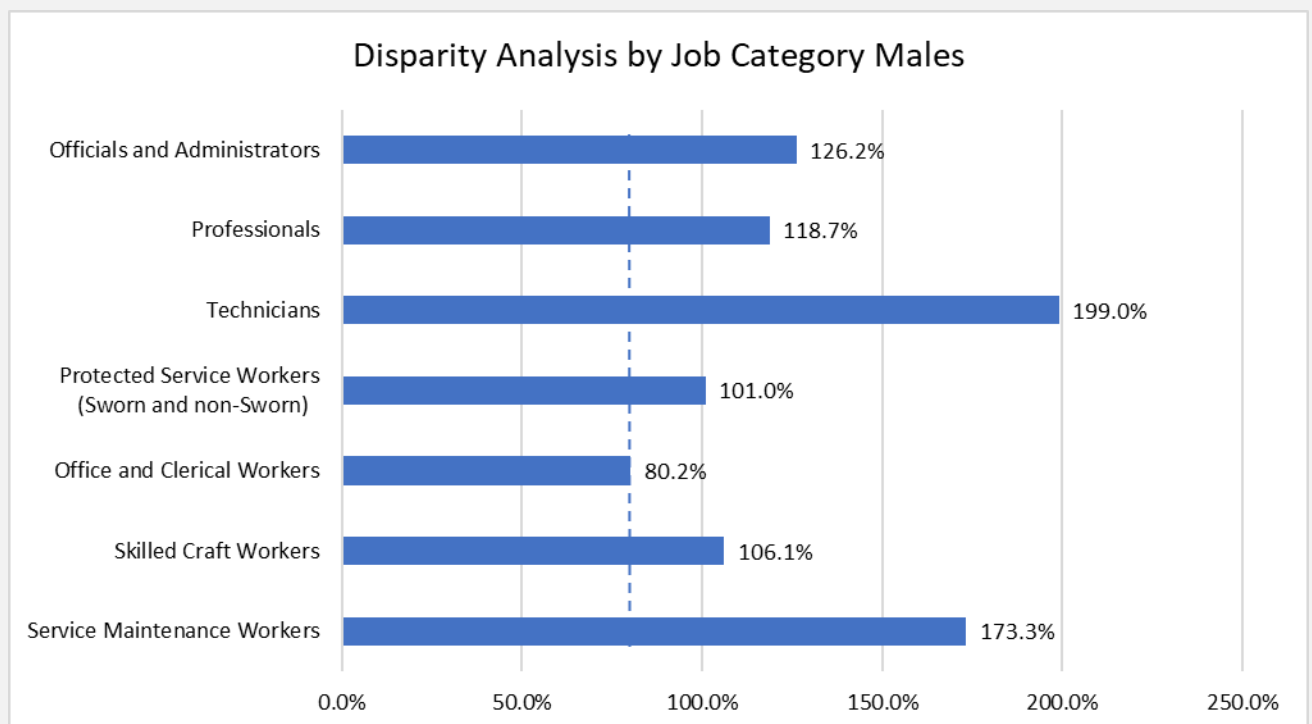
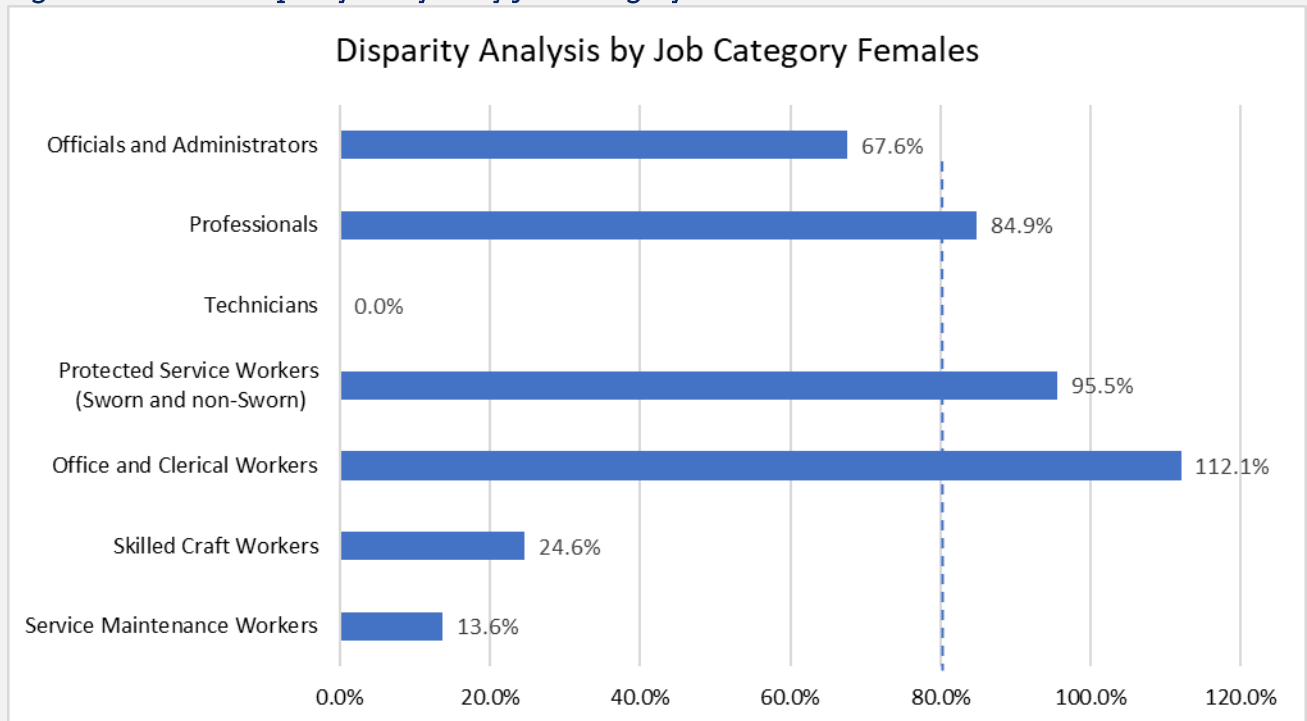


For the seven job categories on the following pages (Figures 7), we find the following:

- Women significantly underrepresented in Officials and Administrators, Technicians, Skilled Craft and Service Maintenance roles.
- Women are near parity for Protective Service and Office and Clerical roles, and are marginally close to being significantly underrepresented for the Professional job category.
- We did not observe any gender inequities for men in any of the seven job categories. Men are marginally close to being significantly underrepresented for Office and Clerical positions.

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Figure 7. Gender Disparity Analysis by Job Category



BARRIER ANALYSIS: POLICIES AND PRACTICES REVIEW

Once quantitative data is collected and analyzed to determine if racial and gender inequities exist, the next step is to identify and understand if any barriers are present. **Barriers are policies or practices within Town operations that may be unintentionally producing and sustaining inequities.** REG requested documentation from the appropriate departments related to policies and practices within the following operations of Town government:

- Employment (hiring, promotions, retention)
- Service delivery and programs
- Purchasing and procurement
- Stakeholder engagement (elected officials/committee members).

Please note, due to data limitations, REG did not provide data on disparities or inequities related to age, sexual orientation and other protected identities and classes. Research shows the greatest inequities within municipal government are racial and gender inequities, and attempting to close racial and gender inequities will positively impact other demographic groups, due to changes in policies and practices, and management of biases.

HIRING, PROMOTIONS AND RETENTION

Recruitment and sourcing talent: When a position is vacant within a Town government department, that department will work with a Human Resources (HR) Generalist focused on recruitment and employment. The Town is working to partner with departments that have historically done their own recruitment and hiring. Whenever a vacancy occurs because of a resignation, retirement, or creation of a new position, the respective Department Head meets with HR. The Town initially attempts to fill the position internally, depending upon the collective bargaining unit, the position, and any internal qualified candidates.

Job descriptions and qualifications: The Town is adding diverse recruitment sources, updating job descriptions and determining what the core qualifications are compared to the preferred qualifications and adjusting language in recruitment ads and job descriptions. Human resources is working with the departments to determine required skills, preferred skills and skills that can be learned on the job. Union positions that are vacant are posted in the department and if no one is qualified in the union, the position is advertised externally.

Interviewing: All job candidates currently apply through the town website. The Town plans to add Applicant Tracking Software to streamline the application process by allowing candidates to apply, and fill out materials electronically. If there are a large number of qualified candidates, HR plans to begin a practice to remove all identifiable information from the resume/application and assign a number to each candidate. Candidate resumes will then be screened and chosen to interview. The first interview will be virtual. The goal is for HR to assist with drafting questions and participate in every interview whether in person or virtual.

Promotions: The process of being promoted varies by the Collective bargaining agreement, and also includes evaluating performance and attendance. If there are two equal candidates, seniority would be the tie breaker. Depending upon the level of the position, the town is considering using a large committee representing each department and a member of the appropriate board, or if an entry level position, the committee would consist of a supervisor, department head and HR. The town has expressed the goal to have an HR representative in every promotional interview, but this practice is not currently in place.

Generally, employees do not receive step increases until they have a satisfactory performance evaluation. There are several performance evaluation forms used by various departments. Managers, professional staff and department heads (mostly exempt staff) use a specific form and non-exempt, non-union staff use a different form. Various departments, Council on Aging, NRC and DPW use a generic form. The Library and Police Department both use different forms as well. The Fire Department has not utilized performance evaluations for years, however it is currently being discussed by the new Fire Chief.











Workforce separations and retention: If a separation is union or civil service, the applicable CBA or legal process applies. Separations data below are for the period: 07/01/2023 to 06/30/2024 and disaggregated by race/ethnicity. REG calculated separations rates to gain insights into voluntary separations initiated by employee. The voluntary separations rate is the number of people who voluntarily separated within a demographic group, divided by the total number of people in the Town's workforce in that particular demographic group.





Reason:	Hispanic:	White:	Black:	Asian:	2+	Unknown:	Total:
Voluntary	3	20	2			2	27
Retirements	1	13		1			15
Involuntary		1					1

While the participation rate of Black employees in the Town's total workforce is 2%, they are separating from the Town at a rate of 28.5% (2/7). Hispanics represent 5.5% of the workforce and are separating at a rate of 15.8% (3/19). White employees represent 90% of the Town's workforce and are separating at a rate 6.4% (20/311). Over the last 20 years, employees have separated from state and local governments at rates less than 2%.

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After reviewing Town government's employment policies and practices, REG conducted a best practices gap analysis below indicating the Town's current status:

Evidenced-based Best Practices	Current Status
Collects demographic data on applicants and current employees (e.g. race/ethnicity, gender)	
Conducts disparity analysis to identify if inequities exist within overall employment representation and by job groups	
Targeted recruitment strategy to attract diverse candidates (e.g. race/ethnicity, gender)	
Routinely reviews job descriptions for biases and validates qualifications, required skills, and experience as a valid business necessity	
Demonstrates good faith efforts to have diverse candidate pools before selection decisions	
Demonstrates good faith efforts to have diverse interview panels and all panelists are trained on biases	
Develops standardized, transparent policies and practices for pathways to promotions	
Develops formal mentoring program available for all employees (if inequities identified in promotions)	
Utilizes a scoring rubric to objectively evaluate candidates during the hiring or promotion process	
Monitors voluntary separations rates disaggregated by demographic groups to track talent retention	

-  **Not started:** practice not present, inactive or currently undetermined
-  **Emerging:** discussions and considerations of the practice are awaiting approval decision
-  **Establishing:** practice partially in place or process for implementation has started
-  **Reinforcing:** practice currently present and active

SERVICES AND PROGRAMS

In order to gauge if the Town provides services and programs equitably to all residents and stakeholders, and measure resident and stakeholder satisfaction, REG collected feedback from a Town-wide community survey. The survey was collected online between July 18th and September 12th 2024. Utilizing and convenience sample, REG created a brochure to advertise the survey and Town government inserted the brochures into 5,852 residential and commercial utility bills. Paper copies were also made available at Town center and all Wellesley Free Library -- locations. Convenience sampling is a non-probability sampling method where researchers select participants based on their easy accessibility, meaning they choose individuals who are readily available to them at the time of the study, resulting in lower costs. Compared to a probability sample, a convenience sample may not accurately represent the larger population of the Town due to the lack of random selection. With convenience sampling, researchers can quickly gather data by selecting readily available participants, making it ideal for preliminary studies or pilot projects where time and cost is a constraint. It can be used to gain initial insights into a topic before conducting a more rigorous study with a representative sample.

Participants answered 28 statements related to the Town's operations. The majority of the statements focused on obtaining feedback on three key measures [where inequities commonly occur for public sector municipalities providing services and programs: access, quality, and treatment](#). Additionally, respondents answered demographic and background questions to create a more robust profile of the respondents. Racial and gender demographics of the community survey participants are presented below. Because demographic questions were not required, certain demographics or groups within the population may be overrepresented or underrepresented in the sample. The study's findings may not be relevant to other contexts or situations outside the specific sample. The community survey collected responses from 1433 Town residents and stakeholders. REG and Elite Research analyzed the validity of all responses to ensure respondents took a reasonable amount of time to complete the survey, responded to a minimum number of statements to provide meaningful content, and responses varied from one statement to the next. [Of the 1433 respondents who began the survey, 968 valid surveys were identified and considered for analysis.](#)

Race/Ethnicity	N	Percent
Asian or Asian American	51	5.2%
Black or African American	24	2.5%
Hispanic or Latinx (non-white)	18	1.8%
Native Hawaiian/Pacific Islander	1	.1%
White	465	47.7%
Multiracial	14	1.4%
Other	17	1.8%
Unknown/PNS	384	39.5%

Gender	N	Percent
Male	235	24.1%
Female	386	39.6%
Non-binary/non-conforming	7	.7%
Transgender	4	.4%
Other	6	.6%
Unknown/PNS	336	34.5%

Note: Town of Wellesley demographics; 71.7% White, 6% Hispanic, 2% Black, 14% Asian, 9% Two or more races
Source: Census ACS Survey 2021, 5-year Estimates

Residents and stakeholders highly rated their experience living in Wellesley. Respondents were most satisfied with the following indicated by 90% or greater agreement:

- access to public services such as fire, police, emergency, and rescue services
- access to parks and recreation programs
- access to quality library services

More than three-quarters reported that they are satisfied living or working in Wellesley (84%). The majority of respondents agreed with all except six of the total 25 survey statements.

Less than half of the survey respondents agreed with each of the following statements:

- access to provide input to Wellesley's School committee (47%)
- access to Town government employment opportunities (46%)
- satisfied with the transparency of Town government's decision-making process (41%)
- access to affordable and quality housing options (40%)
- feedback on Town government policies are valued by decision-makers (39%)
- access to become a vendor or contractor to do business with Town government (25%)

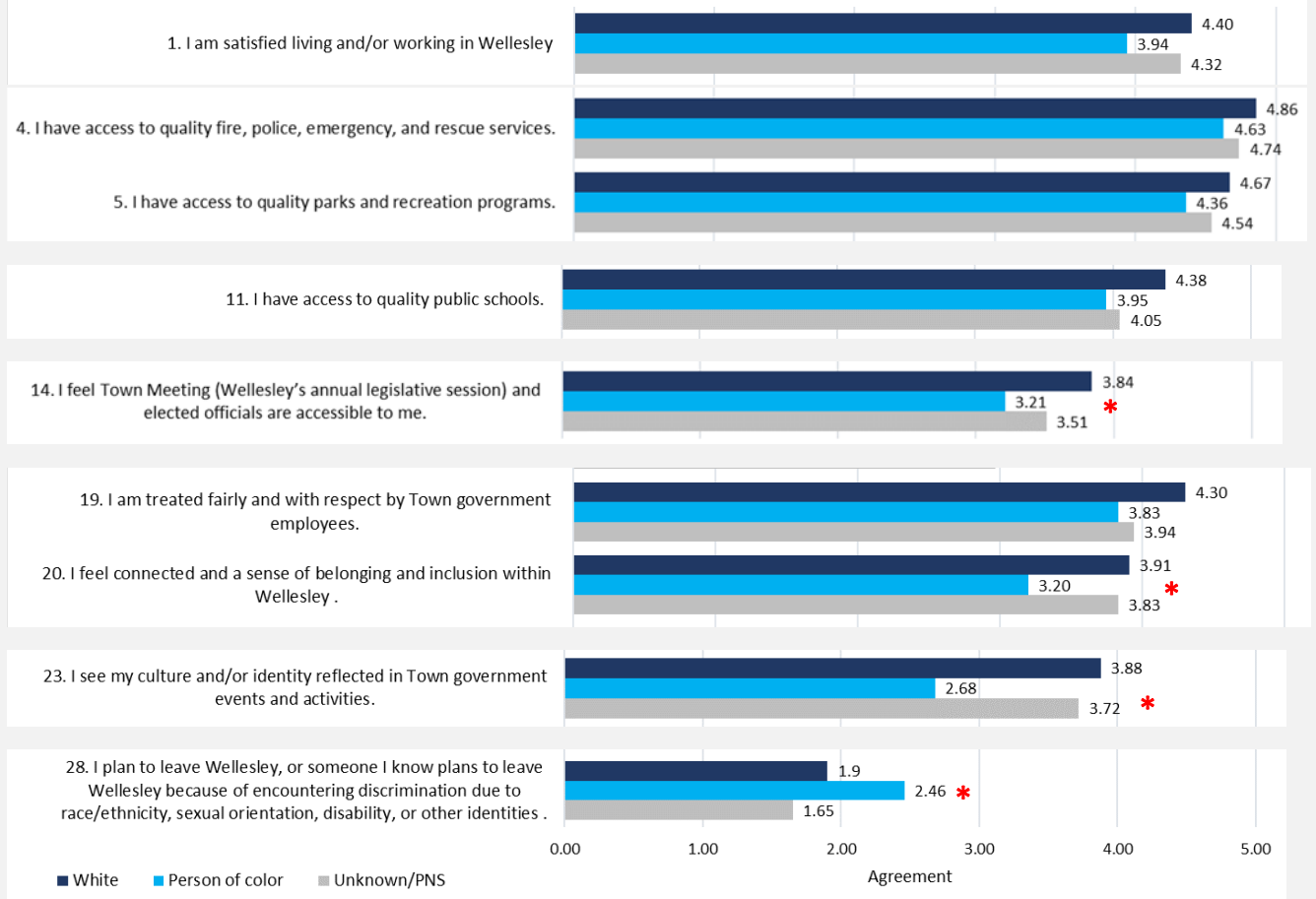
Based on the analysis of the community survey, White respondents and respondents of color experience Wellesley life and Town government differently. The overall mean (average) scores present the profile of the Town collectively, but further analysis segmented by racial/ethnic background provides important context. A series of Analyses of Variance (ANOVA) tests revealed that **White respondents had significantly greater agreement than People of Color (POC) regarding 15 of the 25 positively directed survey statements, where higher agreement indicates greater satisfaction.** The average gap between White respondents and respondents of color was .35 for the first 25 positively directed survey statements. There were no statements where respondents of color had more positive views of Town government or community life.

Respondents of color reported significantly greater scores for the final three statements where greater agreement reflected experiencing barriers due to identity factors (26), discriminatory treatment due to identity factors (27) and a desire to leave Wellesley due to identity discrimination (28). Results for these three items suggest that people of color have higher agreement regarding these statements of experiencing discrimination than do White respondents.

There were nine statements that represented the **highest level of statistically significant differences between White and POC respondents** factoring in sample size. The top four statements with the largest gaps identified with red asterisks, are listed below:

- I see my culture and identity reflected in Town government events/activities (White/POC gap = 1.20)
- I feel connected and a sense of belonging and inclusion within Wellesley (White/POC gap = .71)
- I feel town meeting and elected officials are accessible to me (White/POC gap = .63)
- I plan to leave Wellesley or someone I know plans to leave due to encountering discrimination because of race/ethnicity, sexual orientation, disability or other identities (White vs POC gap = .56)

Wellesley Community Survey Statements by Minority (1 of 4) *Top 4 Largest Gaps



Data as illustrated above from the community survey, provides insights that residents from underrepresented may have inequitable access to town meeting and elected officials, experience discrimination that impacts their plan to remain in Wellesley, and do not feel as connected and a sense of belonging within town based on their social identity. While the results of this convenience sampling community survey, the Town may consider a community needs assessment style survey disaggregated by demographic groups, that is generalizable to the entire population.

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FOCUS GROUP INTERVIEWS

REG requested assistance from Elite Research (ER) with recording and reporting focus group interviews in September 2024. This initiative aimed to capture the lived experiences of residents and stakeholders, contributing to efforts to foster a more inclusive Town.

The purpose of the focus groups was to help the Town identify the experiences of residents and stakeholders to create more inclusivity in the town. In general, focus groups are ways of obtaining in depth experiences of people who share similar experiences according to their role in a community, race, language spoken, gender, and other identifying information.

ER provided REG with feedback on the focus groups questions to ensure open-ended and question relevance to the project goal. ER also provided written reports of each focus group and interview. After the interview and focus groups were completed, notes were written for coding and analysis. To analyze the data, ER staff took a qualitative thematic analysis approach in which they reviewed the data, applied codes to summarize concepts, and organized codes into major themes that helped to complete the project goal.

Discussions during the focus groups revealed several key themes. Themes are the main responses that were discussed in the focus groups. Qualitative analysis revealed five overarching themes across the focus groups. These themes are [Lack of Diverse/Cultural Events](#), [Positive Town Staff Interactions](#), [Barriers to Accessing Resources](#), [Barriers to Inclusive Civic Engagement](#), [Discrimination Experiences](#).

A total of 15 residents and stakeholders participated in the focus groups, which were conducted remotely. For qualitative research like focus groups, we typically strive for three focus groups of 5 to 8 participants. The maximum number of participants would have been 24 participants, and we achieved 15 participants. Best practices for achieving “data saturation,” which indicates that qualitative data collection ceases once we are unable to observe new themes, insights, or patterns from participants. Information related to each focus group is summarized in Table 1 below from participants’ self-identification of their gender, race, and ethnicity:

Table 1

Focus Group Type and Number of Participants

**POC= people of color*

Focus Group	Gender	Demographics	Number of Participants
Focus Group Residents	11 Females; 3 Males	African American(2) Asian (3) White (6) *POC (3)	14
Focus Group Stakeholders	1 Female	White (1)	1
<i>Total</i>	12 Females; 3 Males	African American (2) Asian (3) White (7) *POC (3)	15

One Word




Participants were asked to provide one word that describes their quality of life in the Town of Wellesley, as well as one word that describes the town. Below are their responses.







Based on the focus groups, participants made several recommendations for the Town to consider:

- **Offer diverse events and activities** that cater to various cultural, and ethnic groups within town, and **improve communication** to ensure wider participation.
- **Celebrate diverse holidays and cultures** to make all residents feel more welcome and inclusive.
- **Support diverse events and activities** by having town government staff and/or elected officials **attend and provide resources** to host culturally diverse events that foster a sense of belonging and inclusion.
- **Address disparities in representation** within Town government departments and boards and committees.
- **Encourage diverse representation of staff within Town stores and restaurants** and develop a strategy to attract diverse business owners to serve diverse population.

After reviewing Town government's policies and practices related to providing services and programs, REG conducted a best practices gap analysis below of the Town's current status:

Evidenced-based Best Practices	Current Status
Conducts resident/community surveys periodically (e.g. bi-annually) to measure and monitor performance of providing services and programs for all stakeholders	
Conducts disparity analysis to identify if inequities exist for access, quality and treatment for services and programs (e.g. race/ethnicity, gender)	
Disaggregates survey response data by demographic groups (e.g. race/ethnicity, gender)	

-  **Not started:** practice not present, inactive or currently undetermined
-  **Emerging:** discussions and considerations of the practice are awaiting approval decision
-  **Establishing:** practice partially in place or process for implementation has started
-  **Reinforcing:** practice currently present and active

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PURCHASING AND PROCUREMENT

Purchasing and procurement is one of the largest areas of inequities (along with employment) that we typically observe within the public sector and local governments.

Many Massachusetts municipalities purchase goods and services from popular statewide contracts that are available on behalf of the negotiation efforts of the Operational Services Division (OSD), a state agency. Municipal purchasing departments may not oversee all procurements and certain service contracts are negotiated by departments and documented by legal departments.

The Town follows the procedures outlined by Massachusetts General laws chapter 149 Building Construction, chapter 30, 39M, and 30B, for public works, supplies and services, and design services for public buildings. The laws contain procedures to ensure open and fair competition for contracts paid for with public money. Steps vary slightly based on estimated costs for services. [More importantly, the Massachusetts Inspector General states that municipalities must follow state statutes, and can add additional requirements for contractors.](#)

The table below provides a comprehensive overview of the purchasing and procurement state

Goods and Services (Ch. 30B)	Building Construction (Ch. 149, Secs. 44A-44)/ Ch. 30B, Sec. 16)	Public Works (Ch. 30, Sec. 39M)	Design Services (Ch. 7C)
<p>Less than \$10,000: Sound business practices for selecting vendors capable of providing the goods or services and selecting the best value.</p> <p>\$10,000–\$50,000: Solicit and obtain written quotes from a least three bidders.</p> <p>Over \$50,000: Sealed bids. Post a notice at least four weeks before bids or proposals are due in (1) your jurisdiction's office, and publish at least four weeks before bids or proposals are due in a (2) newspaper, and 3) on COMMBUYS.</p>	<p>Less than \$10,000: Sound business practices for selecting vendors capable of providing the goods or services and selecting the best value.</p> <p>\$10,000–\$50,000: Solicit and obtain written quotes from a least three bidders.</p> <p>\$50,000–\$150,000: Sealed bids. Post a notice at least four weeks before bids or proposals are due in (1) your jurisdiction's office, and publish at least four weeks before bids or proposals are due in a (2) newspaper, and 3) on COMMBUYS.</p> <p>Over \$150,000: Sealed bids. Post a notice at least four weeks before bids or proposals are due in (1) your jurisdiction's office, and publish at least four weeks before bids or proposals are due in a (2) newspaper, and 3) on COMMBUYS.</p>	<p>Less than \$10,000: Sound business practices for selecting vendors capable of providing the goods or services and selecting the best value</p> <p>\$10,000–\$50,000: Solicit and obtain written quotes from a least three bidders.</p> <p>Over \$50,000: Sealed bids. Post a notice at least four weeks before bids or proposals are due in (1) your jurisdiction's office, and publish at least four weeks before bids or proposals are due in a (2) newspaper, and 3) on COMMBUYS.</p>	<p>Estimated Design Fee less than \$30,000 or Estimated Cost Construction less than \$300,000: Solicit and obtain written quotes from a least three bidders.</p> <p>Estimated Design Fee \$30,000 or more and Estimated Cost Construction \$300,000 or more: Qualifications-based selection process. Jurisdiction must either (1) set the design fee; or (2) set a not-to-exceed fee limit and then negotiate the fee with the top-ranked designer within the fee limit.</p> <p>Post a notice at least four weeks before bids or proposals are due in (1) your jurisdiction's office, and publish at least four weeks before bids or proposals are due in a (2) newspaper, and 3) on COMMBUYS.</p>

REG attempted to conduct disparity analysis to determine if there are any disparities and inequities between the utilization of minority and women business enterprises (MWBES) compared to the availability of MWBEs in the relevant marketplace. [Currently, the Town does not collect or track](#)

demographics of vendors and contractors, and REG was unable to determine Town government's baseline demographic representation of suppliers.

REG was able to identify the availability of minority and women firms in the Town's relevant market area using a previous disparity study. The combined availability of minority and White women-owned firms is about 28.9%

Racial/Ethnic Group	Wellesley Contractor/Vendor Representation	Vendor/Contractor Availability	Disparity and Inequity Indicator
White male, non-Hispanic owned	Undetermined	71.1	-
Minority-owned (Black, Hispanic, Asian, Native American)	Undetermined	14.7	-
White Women-owned	Undetermined	14.2	-

A benchmark aspirational goal (not quota) of 14.7 percent of the Town's purchasing and procurement spending with minority business enterprises and 14.2 percent for women-owned firms are realistic goals and would demonstrate commitment to DEI by ensuring full utilization and equal opportunity of available minority and woman-owned firms. (minority/gender firms availability estimates, Supplier Disparity Study City of Boston 2020).

Over the next six years, the Town plans to spend \$111,012,000 for capital spending projects. For these upcoming projects, either for the Town or in collaboration with Schools, the Town should proactively demonstrate good faith efforts to expand outreach to minority businesses and/or organizations that have relationships with firms owned by minorities. REG has provided the Town a list of state certified minority businesses for goods and services, as well as building construction and design services. The Commonwealth of Massachusetts Supplier Diversity Office (SDO) defines "minority business enterprises (MBEs)" as a business owned by people of color, specifically businesses owned by people who identify as Asian, Black, Hispanic and Native American.

The Town should also consider enacting the capital spending, purchasing and procurement policies on the pages 56-57 to help facilitate equal opportunity to do business with the Town.

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After reviewing Town government's purchasing and procurement policies and practices, REG conducted a gap analysis below to indicate the Town's current status:

Evidenced-based Best Practices	Current Status
Collects demographic data on all vendors, contractors and suppliers (e.g. race/ethnicity, gender)	<input type="radio"/>
Conducts disparity analysis to identify if inequities exist within purchasing and procurement (e.g. race/ethnicity, gender)	<input type="radio"/>
Targeted recruitment strategy to attract diverse vendors, contractors and suppliers (e.g. race/ethnicity, gender)	<input type="radio"/>
Reviews vendor and contractor qualification requirements and validates requirements are a valid business necessity and not an unnecessary barrier (e.g. RFP bonding criteria)	<input type="radio"/>
Demonstrates good faith efforts to have diverse vendor pools before selection decisions	<input type="radio"/>
Demonstrates good faith efforts to have diverse interview panels and all panelists are trained on biases	<input type="radio"/>

- ☐ **Not started:** practice not present, inactive or currently undetermined
- ☐ **Emerging:** discussions and considerations of the practice are awaiting approval decision
- ☐ **Establishing:** practice partially in place or process for implementation has started
- ☒ **Reinforcing:** practice currently present and active

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STAKEHOLDER ENGAGEMENT

Board and committee members are an important component of Town government and operations that shape the quality of life within the Town. These members provide input and help shape Town programs and services, the use of public Town funds, and the care of public Town property.

REG attempted to compare the representation data of the Town's current board and committee members to the most recent census demographics of the Town. REG was unable to conduct a comprehensive and complete disparity analysis to identify if any inequities exist within representation of board and committee members.





Racial/Ethnic Group	Town Board and Committee Representation	Town Population Demographics Census 2020
Hispanic or Latino	Undetermined	6%
White, non-Hispanic or Latino	Undetermined	71.7%
Black or African American	Undetermined	2%
Asian American	Undetermined	14%
Two or more races or other	Undetermined	9%





The majority of Wellesley board and committee members, and 240 members of Wellesley Town Meeting are elected via the Annual Town Election held each March. The Town does not collect demographic data board and committee volunteers to help track recruitment and diversity efforts. The Select Board is responsible for the appointment of members of the public to a variety of boards/committees/commissions according to the Town Bylaws. In making such appointments, the Select Board considers the following factors: the evaluation and recommendation of applicants by the board/committee/commission; candidates' specialized skills, knowledge, and experience. [In order to reflect a true cross section of the community, the Select Board will seek to appoint members from diverse backgrounds and fields of expertise whenever possible. Diverse backgrounds will be consistent with the Town's Anti-Racism and Anti-Bias Resolution.](#)

Routine volunteer recruitment is regularly promoted via the Town website and social media platforms using Town-wide announcements and the Town-wide volunteer form. Members of standing committees and special committees are appointed; the appointment policies, process, and terms vary by committee. Departments are responsible for publicizing their specific policies.

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After reviewing Town government's policies and practices related to stakeholder engagement, board and committee representation, REG conducted a best practices gap analysis below indicating the Town's current status:
















Evidenced-based Best Practices	Current Status
Collects demographic data on all board, committee and volunteers (e.g. race/ethnicity, gender)	
Conducts disparity analysis to identify if inequities exist within representation of board, committee and volunteers (e.g. race/ethnicity, gender)	
Targeted recruitment strategy to attract diverse board, committee and volunteers (e.g. race/ethnicity, gender)	
Reviews board and committee member qualification requirements and validates requirements are a valid business necessity	





-  **Not started:** practice not present, inactive or currently undetermined
-  **Emerging:** discussions and considerations of the practice are awaiting approval decision
-  **Establishing:** practice partially in place or process for implementation has started
-  **Reinforcing:** practice currently present and active

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OVERALL FINDINGS AND RECOMMENDATIONS

After examining Town government's policies and practices related to advancing equal opportunity, diversity and inclusion, the best practices gap analysis below identifies the Town's current status.

	Evidenced-based Best Practices	CURRENT STATUS
1	Dedicated position responsible for DEI e.g. diversity officer)	
2	Council or committee monitoring DEI progress	
3	Collects demographic data on applicants, current employees, volunteers, vendors and contractors	
4	Disparity analysis conducted to identify if inequities exist within employment, service delivery/programs, purchasing and procurement, representation on boards/committees	
5	Senior leaders are engaged in DEI goal setting (e.g. periodically reviews inequity data by department and establishes aspirational goals)	
6	Leadership performance and/or compensation (e.g. annual merit and step increases) are a component of DEI performance goals	
7	Written DEI action plan(s) with validated benchmarks and targets	
8	DEI goals, targets and metrics monitored periodically (e.g. quarterly)	
9	Ongoing DEI training available for all employees and not mandatory	
10	Formal mentoring program available for all employees (if inequities identified in promotions)	
11	Internal and external stakeholder reports shared to communicate progress on DEI goals	
12	Conducts periodic employee engagement surveys to measure workplace climate, belonging and inclusion	
13	All survey (e.g. community, employee, supplier) response data is disaggregated by demographic groups (e.g. race/ethnicity, gender)	
14	Targeted recruitment strategy to attract diverse job applicants (e.g. race/ethnicity, gender)	
15	Targeted recruitment strategy to attract diverse vendors, contractors, board and committee volunteers (e.g. race/ethnicity, gender)	

-  **Not started:** practice not present, inactive or currently undetermined
-  **Emerging:** discussions and considerations of the practice are awaiting approval decision
-  **Establishing:** practice partially in place or process for implementation has started
-  **Reinforcing:** practice currently present and active

The recommendations provided below and on the following pages, are based on REG's observations and provide insight into the Town's current status regarding present and active best practices for advancing equal opportunity and DEI. (numbers in parentheses align to specific best practices listed on the previous page).

- **Develop a DEI Resolution to embed DEI best practices into Town operations.**
This action has been successfully completed.
- **Establish Town-wide aspirational goals for employment representation.**
The Town has an opportunity to attract and retain diverse talent. About 26 percent of the Town's relevant recruitment area labor pool is people of color. With an expanded and targeted recruitment strategy and forecasting upcoming job vacancies, the Town should proactively ensure all positions are open to external candidates to attract and select the most qualified candidates. This may also include collaborating with labor unions by informing them of inequities for specific job groups and developing a shared purpose to ensure equal opportunity through the collective bargaining process. Aspirational goals are good faith efforts to expand outreach to qualified candidates and are not quotas.
- **Establish Town-wide aspirational goals for purchasing and procurement representation.**
The Town has an opportunity to attract minority and women owned business enterprises (MWBES). About 15 percent of businesses in the Town's relevant market area are minority businesses and 14 percent are White woman-owned firms that could potentially do business with the Town. Aspirational goals are good faith efforts to expand outreach to qualified suppliers and are not quotas.
- **Standardized DEI commitment statements on all job postings, and purchasing and procurement forms.** The Town currently includes an EEO statement on all job postings and should continue this practice. The Town should also include additional equal opportunity commitment language as well as add the language on its purchasing and procurement forms, and all current bids and request for proposals. An example of additional equal opportunity commitment language policy has been provided by REG within the policy recommendations section of this report.
- **Develop a process for periodically reviewing job descriptions and validating qualifications.**
The Town is currently reviewing job descriptions and updating them to prevent unnecessary barriers for attracting talent. The Town should not lower requirements, but should validate all criteria as a valid business necessity and consider if alternatives can satisfy job criteria (e.g. Master's degree vs experience vs on the job training). An example job descriptions policy has been provided by REG within the policy recommendations section of this report.
- **Consider creating a dedicated position responsible for DEI (e.g. diversity officer); (1) and (2).**
Having a dedicated position responsible for managing DEI and reporting directly to the Town Administrator is one of the most effective evidenced-based components for advancing DEI. The Town should ensure this role has an adequate budget and support to manage and implement recommendations from this gap and barrier analysis report.
- **Collect demographic data for job applicants, current employees, volunteers, vendors and contractors (3).** The Town is collecting demographic data on employees as required by the federal government, but not collecting data for volunteers and suppliers. The Town should survey board volunteers, and vendors and contractors to allow them to voluntarily identify their

social demographic status.

- **Conduct disparity analysis to identify if inequities exist within employment, service delivery/programs, purchasing and procurement, representation on boards/committees (4).** The Town was able to identify disparities and inequities within its workforce, services and programs, where people of color reported significantly lower agreement than Whites regarding the accessibility of town meeting and elected officials, a sense of belonging and inclusion within the community and encountering discrimination. After surveying current board and committee members, and vendors and contractors, the Town should analyze representation data and compare it to the validated benchmarks provided in this report. If inequities are discovered, the Town should identify what policies or practices may be unintentionally driving the inequities and opportunities to expand outreach and attract diverse board and committee volunteers, as well as vendors and contractors.
- **Senior leaders are engaged in DEI goal setting (e.g. periodically reviews disparity data by department) (5).** Town executives and departments leaders should continue to be engaged when reviewing disparity and inequity data and identifying policies and practices that contribute to inequities. Departments leaders should be expected to help address any inequities to help the Town advance DEI. Example goals may be underrepresentation of employment or procurement spending with minority businesses within certain departments (see additional goal examples in best practice (6). Data from the DEI audit staff survey revealed staff of color and White staff have observed unfair treatment and a lack of inclusion based on a person's social identity. Staff separations are also significant for Black and Hispanic staff. Senior leaders should be engaged to address these issues and cultivate a fair and inclusive workplace in all departments.
- **Leadership performance and/or compensation (e.g. annual merit and step increases) tied to DEI component of performance goals (6).** What gets measured gets done. To prevent conflicting priorities from managers and leaders, senior leaders should be involved in establishing DEI goals. Annual merit or step increases should also be aligned to a successful performance review that includes DEI related performance goals. While DEI goals will be different for various managers and leaders, below are example competencies and goals to be used to demonstrate developing actual goals and competencies;
 - a. makes substantial progress on implementing equal opportunity within the department;
 - b. ensures strategic priorities, budgeting, purchasing, recruitment, and other decisions involve considerations of equal opportunity in order to reduce any identified inequities
 - c. educates Town departments and staff on how to apply a DEI mindset within decision-making in order to advance DEI and achieve inequity reduction goals while not discriminating
 - d. provides timely reports on progress made towards meeting the DEI Action plan goals.
 - e. works closely with external organizations (e.g. State supplier diversity office, MassHire, Black Economic Council of Mass) to provide support and assistance to Town departments for promoting equity within purchasing and procurement
 - f. evaluates zoning laws to promote diverse neighborhoods and affordable housing
 - g. effectively manages staff by recruiting, promoting, and retaining a highly qualified, diverse staff

- **Written DEI action plan(s) with validated benchmarks and targets (7).** Once disparity and inequity data, as well as policies and practices are reviewed, a written action plan must be developed. The action plan should include short and long-term goals that state how much will be achieved, and by when. REG has created a recommended action plan and scorecard based on the findings in this report. The Town can determine how to prioritize the recommendations based on current priorities and resource constraints.
- **DEI goals, targets and metrics monitored periodically (e.g. quarterly) (8).** The Town should develop metrics and indicators to allow tracking of DEI progress. REG has provided metrics and indicators within the DEI action plan and scorecard for the Town to consider.
- **Ongoing DEI training available for all employees and not mandatory (9).** The Town has recently conducted foundational DEI training for all department leaders, it should continue to make training available for department leaders and all staff on a voluntary basis. Foundational DEI training should be mandatory for all staff and new employees and included within the orientation and onboarding process. The training must be relevant and align to the job duties of staff.
- **Formal mentoring program available for all employees (10).** Mentoring programs are effective for facilitating promotions of underrepresented groups and increasing representation within management. The Town does not need to focus on a formal mentoring program at this time, instead the Town should focus resources on increasing outreach to attract diverse talent.
- **Internal and external stakeholder reports are shared to communicate progress on DEI goals (11).** The Town currently is very transparent with its DEI reporting and progress updates, and should continue to provide a summarized report included on the DEI webpage and monthly newsletters, Town 's annual report or strategic plan, that illustrates DEI goals, action plans and current status of all goals and other achievements.
- **Conducts periodic employee engagement surveys to measure workplace climate, belonging and inclusion (12) (13).** The Town recently completed a DEI audit assessment survey that measured DEI as well as belonging and inclusion. The Town should continue surveying employees periodically every 12 to 18 months, or as appropriate to allow the Town to demonstrate progress. The Town must ensure all survey response data is disaggregated by demographic groups, primarily race/ethnicity, gender and other protected class identities.
- **Targeted recruitment strategy to attract diverse job applicants, vendors and contractors, board and committee members (14) (15).** One of the most effective tools for advancing equal opportunity is the targeted recruitment of underrepresented groups. The Town must explore strategies such as partnering with external organizations that represent diverse professionals and business owners. The Town needs to develop long-term relationships with these organizations to expand the pool of talent and suppliers. The Town should invest in an applicant tracking platform (e.g. Lever) that allows tracking demographics of job applicants to measure the performance of its recruitment outreach strategy and adjust accordingly. The Town should consider developing a formal paid internship program for building a pipeline of potential talent (e.g. MassHire, METCO). The internship program will be an investment in a potential pipeline of talent for the Town. To attract diverse suppliers, the Town's purchasing and procurement department should develop relationships with the State Supplier Diversity Office and the Black Economic Council of Massachusetts (BECMA) to assist in identifying diverse vendors.

POLICY RECOMMENDATIONS

Listed below are policies and practices REG recommends the Town to consider enacting. Policies can facilitate culture change and create a sense of urgency for all staff to promote equal opportunity and DEI. The policies as written may be modified as deemed appropriate. (numbers in parentheses align to strategic objectives).

POLICY NAME	POLICY ACTION	INTENDED OUTCOME
(1.1) Removing Barriers and Bias From Job descriptions:	<ul style="list-style-type: none"> All job descriptions shall use gender-neutral language; jobs with a minimum level of education as an entrance requirement must be reviewed by the Human Resources Department who will conduct a job analysis and determine that a particular level of education or experience is a valid business necessity. All hiring managers must consider the full set of competencies and skills that candidates can bring to the job beyond traditional education and experience. 	<ul style="list-style-type: none"> Avoids unnecessary barriers that are not a valid business necessity to perform the job, and bias that may unintentionally exclude talent.
(1.1) Job Postings that Promote Equal Opportunity:	<ul style="list-style-type: none"> All job postings will include additional equal opportunity commitment language. <i>Example: Alert: The Town of Wellesley is committed to an equal opportunity and inclusive workplace where all employees feel respected, valued, and empowered to serve our residents and stakeholders. Join us today! We encourage individuals from historically underrepresented groups to apply, including minorities, females, veterans, and persons with disabilities. The Town of Wellesley is an Equal Opportunity Employer and does not discriminate on the basis of race, religion, color, sex, gender identity or expression, sexual orientation, age, disability, national origin, veteran status, or any other basis covered by appropriate law.</i> 	<ul style="list-style-type: none"> Encourages and promotes equal opportunity. Generates an applicant pool reflective of the qualified available labor pool, in the Town's reasonable recruitment area.
(1.1) Reasonable Recruitment Time Frames:	<ul style="list-style-type: none"> For vacant positions, HR and/or the diversity officer will work with the hiring manager to determine an appropriate recruitment time frame to allow sufficient time to expand recruitment of underrepresented candidates, while not excluding any group based on protected classes, and also meeting the department's need to fill the position as soon as possible. 	<ul style="list-style-type: none"> Avoids hiring too fast just to fill the vacant position. Generates a more competitive pool of qualified candidates to select from.

POLICY NAME	POLICY ACTION	INTENDED OUTCOME
(1.1) Utilizing Staffing Agencies and Recruitment Firms:	<ul style="list-style-type: none"> Any staffing or recruitment firm that the Town engages for services is expected to include underrepresented candidates in the pool from which the hiring manager or committee selects candidates in a way that does not discriminate or violate federal state, or local discrimination laws. In evaluating the firms' performance and partnership, the Town will consider their ability to meet the expectations of this policy and the firms' own commitment to equal opportunity. 	<ul style="list-style-type: none"> Maximizes return on investment of taxpayer dollars for purchasing recruitment services.
(1.3) Standardizing Applicant Screening Criteria:	<ul style="list-style-type: none"> Applicant screening criteria will be based on minimum entrance requirements, special requirements, and the essential skills and subject matter knowledge an individual must possess to successfully do the job. The screening criteria should be based on competencies that generally are listed on the resume. All screeners should review resumes and cover letters for the same set of skills, and there will be more than one person to screen cover letters and resumes that are categorized into a yes, no, and maybe pool of candidates. When complete, screeners should review their results with the human resources director or diversity officer and determine who to invite for an interview. 	<ul style="list-style-type: none"> Minimizes selection bias and establishes an objective evaluation of all candidates based on the necessary job competencies.
(1.1) Equal Opportunity Candidate Pools:	<ul style="list-style-type: none"> Hiring managers, with support from HR must demonstrate good faith efforts to build diverse candidate slates reflective of the organization's designated available labor pool. Good faith efforts include outreach to underrepresented groups or organizations that serve and support underrepresented groups. HR will review the candidate slate benchmarked against the available labor pool. The recruitment and hiring process will only advance once it is determined that there is a diverse candidate slate available to interview, while not excluding any group based on protected classes. The hiring manager may request a waiver to proceed with the interview process in the absence of a diverse candidate slate. HR and the Select Board Office will evaluate the reasons for the waiver by the following: (1) demonstrated evidence of good faith efforts to comply with the diverse candidate slate policy; (2) job has been posted for 90 days and no qualified underrepresented candidate has applied or been identified by the hiring manager or recruitment personnel. (3) plan of action created by the hiring manager and HR to improve outreach efforts and qualified underrepresented talent to the candidate pool when a position within this job category is available in the future. 	<ul style="list-style-type: none"> Generates a more competitive pool of qualified candidates to select from, based on the validated benchmark of the available labor pool.

POLICY NAME	POLICY ACTION	INTENDED OUTCOME
(1.3) Interviewing, Hiring and Promotions Scoring Rubric	<ul style="list-style-type: none"> All hiring managers must use a scoring rubric template tool that defines clear criteria by which each candidate will be evaluated, including a scoring scale or range, description of the scoring range, and sample questions that demonstrate how to apply the scoring rubric. The tool should also include specific job competencies to evaluate, and an interview pass point on the scoring range. The pass point is the minimum score necessary to pass the interview. 	<ul style="list-style-type: none"> Evaluates candidates on objective measures rather than subjective. Defines expectations by which each candidate will be evaluated, including a scoring scale/range, description of the scoring range and sample questions that demonstrate how to apply the scoring rubric.
(1.2) Exit Interviews:	<ul style="list-style-type: none"> Once an employee provides notice of resignation, the immediate manager will inform human resources. Human resources will contact the employee to request an exit interview. There is no obligation for an employee to participate. They will have the option of doing the interview face-to-face or completing an online form. 	<ul style="list-style-type: none"> Measures and monitors talent retention with quantitative and qualitative data. Provides insights into organizational culture and impacts to employee engagement and productivity. Identifies trends or challenges that may affect talent retention

POLICY NAME	POLICY ACTION	INTENDED OUTCOME
(2.2) Forecasting bids and solicitation:	<ul style="list-style-type: none"> All Town purchasing personnel will solicit all bids and requests for proposals as far ahead as possible, preferably at least 12 weeks ahead of the due date. 	<ul style="list-style-type: none"> Provides sufficient time for smaller firms to prepare responses to solicitations.
(2.2) Bid and Solicitation Assistance:	<ul style="list-style-type: none"> The Town will provide supportive services such as technical assistance, vendors fairs and seminars (e.g. how to bid, how to register, how to become certified), obtaining bonding and credit, in advance of bid issuances periodically. 	<ul style="list-style-type: none"> Facilitates networking opportunities between prime and subcontractors. And provides equal access to procurement staff.
(2.2) Bid/Solicitation Postings:	<ul style="list-style-type: none"> All bids and solicitations will include additional equal opportunity commitment language. Example: <i>Alert: The Town of Wellesley is committed to doing business with all vendors, including diverse vendors and contractors. Come do business with us! The Town of Wellesley does not discriminate on the basis of race, religion, color, sex, gender identity or expression, sexual orientation, age, disability, national origin, veteran status, or any other protected class. Research suggests that firms owned by women, and people of color may choose not to bid in belief that larger and more familiar firms will receive an unfair preference. We encourage firms of all sizes who believe they can provide the requested goods and services to respond to this bid.</i> 	<ul style="list-style-type: none"> Encourages and promotes equal opportunity to do business with the Town. Generates a bidder pool reflective of the available vendor pool, in the Town's relevant market area.
(2.2) Monitor Contractor Commitment:	<ul style="list-style-type: none"> All Town purchasers will communicate to prime contractors in all solicitations the Town's aspirational goals (not quotas) and assistance in meeting those goals. Prime contractors must submit a proposed utilization of state certified MWBEs in bid submissions above \$50,000. While bids will not be rejected if a certain aspirational goal is not met, failures to adhere to the anti-discrimination policies, federal and state laws, including the Massachusetts General Law False Claims Act, may result in an investigation, financial penalties and rejection of a bid. The Town reserves the right to designate contractor, after an investigation as ineligible for future Town bid awards. The Town will track the contractor's commitment to good faith efforts using documentation completed by the contractor. The Town will validate with MWBEs the actual amount of utilization by prime contractors. 	<ul style="list-style-type: none"> Deters false claims of stated commitments to work with MWBEs and the actual outcomes of utilizing MWBEs. Expands equal opportunity to do business with the Town.

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POLICY NAME	POLICY ACTION	INTENDED OUTCOME
(2.2) Forecasting bids and solicitation:	<ul style="list-style-type: none"> All Town purchasing personnel will solicit all bids and requests for proposals as far ahead as possible, preferably at least 12 weeks ahead of the due date. 	<ul style="list-style-type: none"> Provides sufficient time for smaller firms to prepare responses to solicitations.
(2.2) Bid and Solicitation Assistance:	<ul style="list-style-type: none"> The Town will provide supportive services such as technical assistance, vendors fairs and seminars (e.g. how to bid, how to register, how to become certified), obtaining bonding and credit, in advance of bid issuances periodically. 	<ul style="list-style-type: none"> Facilitates networking opportunities between prime and subcontractors. And provides equal access to procurement staff.
(2.2) Bid/Solicitation Postings:	<ul style="list-style-type: none"> All bids and solicitations will include additional equal opportunity commitment language. Example: <i>Alert: The Town of Wellesley is committed to doing business with all vendors, including diverse vendors and contractors. Come do business with us! The Town of Wellesley does not discriminate on the basis of race, religion, color, sex, gender identity or expression, sexual orientation, age, disability, national origin, veteran status, or any other protected class. Research suggests that firms owned by women, and people of color may choose not to bid in belief that larger and more familiar firms will receive an unfair preference. We encourage firms of all sizes who believe they can provide the requested goods and services to respond to this bid.</i> 	<ul style="list-style-type: none"> Encourages and promotes equal opportunity to do business with the Town. Generates a bidder pool reflective of the available vendor pool, in the Town's relevant market area.
(2.2) Monitor Contractor Commitment:	<ul style="list-style-type: none"> All Town purchasers will communicate to prime contractors in all solicitations the Town's aspirational goals (not quotas) and assistance in meeting those goals. Prime contractors must submit a proposed utilization of state certified MWBEs in bid submissions above \$50,000. While bids will not be rejected if a certain aspirational goal is not met, failures to adhere to the anti-discrimination policies, federal and state laws, including the Massachusetts General Law False Claims Act, may result in an investigation, financial penalties and rejection of a bid. The Town reserves the right to designate contractor, after an investigation as ineligible for future Town bid awards. The Town will track the contractor's commitment to good faith efforts using documentation completed by the contractor. The Town will validate with MWBEs the actual amount of utilization by prime contractors. 	<ul style="list-style-type: none"> Deters false claims of stated commitments to work with MWBEs and the actual outcomes of utilizing MWBEs. Expands equal opportunity to do business with the Town.

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POLICY NAME	POLICY ACTION	INTENDED OUTCOME
(2.1) Collecting Vendor MWBE Status:	<ul style="list-style-type: none"> All departments must complete the request for quotes form and document number of quotes obtained from MWBEs. When submitting a requisition for a new contract, departments must attach and submit the request for quotes form demonstrating outreach to MWBEs. Purchasing personnel will enter MWBE status of vendors for all new contracts in the electronic purchasing system (e.g. MUNIS). Prior to contract approval or distribution of any payments, vendor must provide a copy of their state certification letter. 	<ul style="list-style-type: none"> Obtains data for measuring and monitoring equal opportunity to do business with the Town.
(2.2) MWBE Utilization Plan:	<ul style="list-style-type: none"> All persons or entities submitting a proposal to enter into a contract for construction, design or engineering services, or the procurement of goods, supplies or services in excess of \$50,000 with the Town are required to submit with any such proposal an inclusionary participation plan containing the following elements: <ul style="list-style-type: none"> A report detailing the results achieved by the contractor over the prior two years to employ minorities and women, subcontract with businesses owned by minorities and women, joint venturing and other creative initiatives to increase the level of participation of minorities and women in employment and new business relationships. A plan detailing the efforts to be made by the proposer during the term of the proposed contract with the City to employ minorities and women, subcontract with businesses owned by minorities and women, joint venturing and other creative initiatives to increase the level of participation of minorities and women in employment and new business relationships. Bids will not be rejected if an aspirational goal is not met, but failures to adhere to the anti-discrimination policies, federal and state laws, including the Massachusetts False Claims Act, may result in an investigation, financial penalties and rejection of a bid. The City will track the contractor's commitment to good faith efforts using documentation completed by the contractor. The City will validate with MWBEs the actual amount of utilization by prime contractors. The City reserves the right to designate contractor as ineligible for future City bid awards. 	<ul style="list-style-type: none"> Promotes equal opportunity to participate in all City funded contracts. Builds capacity for increasing competition for awarding contracts by the City. Prevents vendors with a dominant market position from using their power to unfairly gain City contracts.

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Goods and Services (Ch. 30B)	Building Construction (Ch. 149, 44A-44J/ Ch. 30B)	Public Works (Ch. 30, Sec. 39M)	Design Services (Ch. 7C)
<p>Less than \$10,000: Sound business practices includes demonstrating good faith efforts to identify all business types, including minority and women business enterprises (MWBES) capable of providing the goods or services and selecting the best value.</p> <p>\$10,000–\$50,000: Solicit and obtain written quotes from a least three bidders. <i>Demonstrate good faith efforts to obtain quotes from MWBES.</i></p> <p>Over \$50,000: Post a notice at least four weeks before bids or proposals are due in (1) your jurisdiction's office, a (2) newspaper, 3) on COMMBUYS and external organizations that serve minority business enterprises (MWBES). <i>*Prime contractors must submit a proposed utilization plan of certified MWBES.</i></p>	<p>Less than \$10,000: Sound business practices includes demonstrating good faith efforts to identify minority business enterprises (MWBES) capable of providing the goods or services and selecting the best value.</p> <p>\$10,000–\$50,000: Solicit and obtain written quotes from a least three bidders. <i>Demonstrate good faith efforts to obtain quotes from MWBES.</i></p> <p>\$50,000–\$150,000: Post a notice at least four weeks before bids or proposals are due in (1) your jurisdiction's office, and publish at least four weeks before bids or proposals are due in a (2) newspaper, and 3) on COMMBUYS and external organizations that serve MBES. <i>*Prime contractors must submit a proposed utilization plan of certified MWBES.</i></p> <p>Over \$150,000: Post a notice at least four weeks before bids or proposals are due in (1) your jurisdiction's office, a (2) newspaper, 3) on COMMBUYS and external organizations that serve DCAMM certified MBES. <i>*Prime contractors must submit a proposed utilization plan of certified MWBES.</i></p>	<p>Less than \$10,000: Sound business practices includes demonstrating good faith efforts to identify minority business enterprises (MWBES) capable of providing the goods or services and selecting the best value.</p> <p>\$10,000–\$50,000: Solicit and obtain written quotes from a least three bidders. <i>Demonstrate good faith efforts to obtain quotes from MWBES.</i></p> <p>Over \$50,000: Post a notice at least four weeks before bids or proposals are due in (1) your jurisdiction's office, a (2) newspaper, 3) on COMMBUYS and external organizations that serve that serve MWBES. <i>*Prime contractors must submit a proposed utilization plan of certified MWBES.</i></p>	<p>Estimated Design Fee less than \$30,000 or Estimated Cost Construction less than \$300,000: Solicit and obtain written quotes from a least three bidders. <i>Demonstrate good faith efforts to obtain quotes from MWBES.</i></p> <p>Estimated Design Fee \$30,000 or more and Estimated Cost Construction \$300,000 or more:</p> <p>Post a notice at least four weeks before bids or proposals are due in (1) your jurisdiction's office, a (2) newspaper, 3) on COMMBUYS and external organizations that serve that serve MBES. <i>*Prime contractors must submit a proposed utilization plan of certified MWBES.</i></p>

POLICY NAME	POLICY ACTION	INTENDED OUTCOME
(1.4) Benchmarking Representation	<ul style="list-style-type: none"> The Select Board Office will collect demographics of Town board and committee volunteers, and benchmark the representation of volunteers to the most recent Census population demographics of the Town, identifying any significant disparities or "inequities." The Town will address any inequities by evaluating board and committee volunteer barriers to participation and enact policies that promote equal opportunity to serve on all board and committees. 	<ul style="list-style-type: none"> Establishes a validated quantitative benchmark for measuring representation of volunteers and monitors if all voices in town are being heard prior to decision-making on Town policies, budgets, and programs. Defines expectations by which each candidate will be evaluated, including a scoring scale/range, description of the scoring range and sample questions that demonstrate how to apply the scoring rubric.
(3.0) Volunteer Training and Expectations:	<ul style="list-style-type: none"> All board and committee members are expected to become informed and knowledgeable of any quantitative or qualitative disparities that may infer discrimination, or demonstrate barriers to equal opportunity for all Town residents and stakeholders within the community and Town government departments, including; equal access to Town government employment and contracting opportunities; Town government services and programs; board and committee positions; and resident and stakeholder experiences within public accommodations, by collecting and/or obtaining data disaggregated by demographic group from Town staff or validated sources. The Town will provide all board and committee members with training to align with the Town's adopted Anti-Racism and Anti-Bias Statement, and civil rights and equal opportunity laws. 	<ul style="list-style-type: none"> Informs and equips board and committee volunteers with the necessary knowledge that for effective decision-making on Town policies, practices, budgets and programs. Provides insights into the needs of all residents and stakeholders. and understanding to shape belonging and inclusion for the entire town.

CONCLUSION

The Town has demonstrated initial good faith first steps to create an environment of equal opportunity within its operations and is building the organizational infrastructure necessary for advancing DEI throughout Town government. However, this gap and barrier analysis report has identified several areas where inequities exist and strategies to address them to ensure equal opportunity and belonging and inclusion for all stakeholders.


This report provides the Town with the necessary foundation and recommendations that the Town must decide how to prioritize and implement with existing capacity and priorities. REG has provided a recommended DEI action plan for the Town to utilize as a guide for immediate implementation, effective execution and long-term sustainability.

With identified baselines, knowledge of best practices, and understanding the Town's current state of DEI, the Town is positioned to continue its journey to successfully create a community that effectively promotes DEI and uses data to measure, monitor and manage equal opportunity, and belonging and inclusion for all residents and stakeholders.

On behalf of the Racial Equity Group, we appreciate the opportunity to partner with the Town of Wellesley, and the Town's DEI committee, who contributed to this report.

We look forward to observing the change in policies and practices that create environments of equal opportunity and belonging and inclusion for all staff, residents and stakeholders.

Bird Guess



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APPENDIX

Definitions of Diversity, Equity and Inclusion Terms

Belonging: the feeling of being accepted and supported by others

Diversity: characteristics that make one individual or group different from another.

Disparity: quantitative or qualitative differences between groups

Discrimination: unfavorable actions (intentional) or outcomes (unintentional) against racial groups that are illegal and protected by Civil Rights Acts. Intentional is disparate treatment, unintentional is disparate impact.

Diverse Candidate Slate: A diverse candidate slate is a group of qualified candidates that includes individuals who are underrepresented within a job group throughout the organization

Inequity: significant and/or persistent racial disparities resulting from structural advantage/disadvantage or biases.

Micro-aggressions (biases in action): verbal, nonverbal, and environmental slights, snubs, or insults, intentional or unintentional, that communicate who belongs and who is normal.

Racial Equity: reducing significant and/or persistent racial disparities resulting from structural advantage and disadvantage, discrimination, or biases, to levels of non-significance.

Racial Inequity: significant and/or persistent racial disparities resulting from structural advantage/disadvantage, discrimination or biases.

Racial Equity Mindset: way of being, habit of thinking and acting to prevent and reduce racial inequities.

Racialization: process of structuring society with people classified by racial categories, establishing racial ingroups and outgroups, social practices and becoming a racialized system.

Racialized System: routine operation of social structures (e.g. political, housing) in a racialized society that sustain structural advantage/disadvantage and maintain racial inequities.

Racism: policies and practices throughout a society that intentionally harm (e.g. deny, exclude) a racial group.

Racist: an individual or institution who directly or indirectly supports racism and acts against a racial group causing harm.

Structural Advantage/Disadvantage: the social position and perception of a racial group within the social structures of society (e.g. political, economic) resulting from historical racism and present-day biases, that facilitate advantage or disadvantage and sustain racial inequities.

Systemic change: actions and efforts that significantly change the outcomes of a social system (e.g. political, economic, or educational system)

Description of EEO Job Group Categories

Officials – Administrators: Occupations in which employees set broad policies, exercise overall responsibility for execution of these policies, direct individual departments or special phases of the agency's operations, or provide specialized consultation on a regional, district or area basis. Includes: department heads, bureau chiefs, division chiefs, directors, deputy directors, controllers, wardens, superintendents, sheriffs, police and fire chiefs and inspectors, examiners (bank, hearing, motor vehicle, warehouse), inspectors (construction, building, safety, rent-and-housing, fire, license, dairy, livestock, transportation), assessors, tax appraisers and investigators, coroners, farm managers, and kindred workers.

Professionals: Occupations which require specialized and theoretical knowledge which is usually acquired through college training or through work experience and other training which provides comparable knowledge. Includes: personnel and labor relations workers, social workers, doctors, psychologists, registered nurses, economists, dietitians, lawyers, systems analysts, accountants, engineers, employment and vocational rehabilitation counselors, teachers or instructors, police and fire captains and lieutenants, librarians, management analysts, airplane pilots and navigators, surveyors and mapping scientists, and kindred workers.

Technicians: Occupations which require a combination of basic scientific or technical knowledge and manual skill which can be obtained through specialized post-secondary school education or through equivalent on-the-job training. Includes: computer programmers, drafters, survey and mapping technicians, licensed practical nurses, photographers, radio operators, technical illustrators, highway technicians, technicians (medical, dental, electronic, physical sciences), police and fire sergeants, inspectors (production or processing inspectors, testers, and weighers), and kindred workers.

Protective Service: Occupations in which workers are entrusted with public safety, security, and protection from destructive forces. Includes: police patrol officers, firefighters, guards, deputy sheriffs, bailiffs, correctional officers, detectives, marshals, harbor patrol officers, game and fish wardens, park rangers (except maintenance), and kindred workers.

Paraprofessionals: Occupations in which workers perform some of the duties of a professional or technician in a supportive role, which usually require less formal training and/or experience normally required for professional or technical status. Such positions may fall within an identified pattern of staff development and promotion under a new careers concept. Included: research assistants, medical aides, child support workers, policy auxiliary welfare service aides, recreation assistants, homemaker aides, home health aides, library assistants and clerks, ambulance drivers and attendants, and kindred workers.

Administrative Support: Occupations in which workers are responsible for internal and external communication, recording and retrieval of data and/or information and other paperwork required in an office. Includes: bookkeepers, messengers, clerk-typists, stenographers, court transcribers, hearing reporters, statistical clerks, dispatchers, license distributors, payroll clerks, office machine and computer operators, telephone operators, legal assistants, sales workers, cashiers, toll collectors, and kindred workers.

Skilled Craft: Occupations in which workers perform jobs which require special manual skill and a thorough and comprehensive knowledge of the process involved in the work which is acquired through on-the-job training and experience or through apprenticeship or other formal training programs. Includes: mechanics and repairers, electricians, heavy equipment operators, stationary

engineers, skilled machining occupations, carpenters, composers and typesetters, power plant operators, water and sewage treatment plant operators, and kindred workers.

Service – Maintenance: Occupations in which workers perform duties which result in or contribute to the comfort, convenience, hygiene, or safety of the general public or which contribute to the upkeep and care of buildings, facilities, or grounds of public property. Workers in this group may operate machinery. Includes: chauffeurs, laundry and dry-cleaning operatives, truck drivers, bus drivers, garage laborers, custodial employees, gardeners, and groundskeepers, refuse collectors, construction laborers, park rangers (maintenance), farm workers (except managers), craft apprentices/trainees/helpers, and kindred workers.

About the EEO Workforce Availability Dataset:

Why does the Census Bureau produce the EEO Tabulation 2014-2018 (5-year ACS data)?

The Census Bureau produces the EEO Tabulation 2014-2018 (5-year ACS data) for Federal agencies responsible for monitoring employment practices and enforcing civil rights laws in the workforce, and for all employers so they can measure their compliance with the laws. The EEO Tabulation 2014-2018 (5-year ACS data) serves as the primary external benchmark for conducting comparisons between the racial, ethnic, and sex composition of each employer's workforce to its available labor market.

The following four agencies sponsor this tabulation:

- Equal Employment Opportunity Commission (EEOC)
- Department of Justice's Employment Litigation Section of the Civil Rights Division (DOJ)
- Department of Labor's Office of Federal Contract Compliance Programs (DOL-OFCCP)
- Office of Personnel Management (OPM)

What is the American Community Survey (ACS) 2014-2018 5-year data file?

The American Community Survey (ACS) produces period estimates of socioeconomic and housing characteristics. It is designed to provide estimates that describe characteristics of an area over a specific time period. In the case of ACS one-year estimates, the period is the calendar year. While a one-year estimate includes information collected continuously nearly every day from independent monthly samples over a 12-month period, a five-year estimate includes statistics collected over a 60-month period. Then we aggregate the results over the specified time period. For example, the 2014-2018 ACS five-year estimates describe the population and housing characteristics of an area for the period January 1, 2014, through December 31, 2018. They do not describe any specific day, month, or year within that time period. The cumulative sample of the ACS taken over a five-year time period allows measurement of detailed characteristics in local geographies and increases precision of its estimates.

