

State of Wisconsin
Office of the Commissioner of Insurance
Equity and Inclusion Plan
January 1, 2024 – December 31, 2026

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Acknowledgment

We have reviewed and firmly endorsed the content of this equity and inclusion plan. We are committed to ensuring equal employment opportunity, freedom from discrimination, and affirmative action in compliance with state laws and policies as well as federal laws. By formally integrating equity and inclusion values and practices into existing processes, the Equity and Inclusion Plan enables progress and results to be measured agency wide.

Appointing Authorities:

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Insurance Commissioner

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Deputy Insurance Commissioner

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DPM Equity and Inclusion Officer:

Nicholas Wittwer
Equity and Inclusion Specialist, Senior

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Equity and Inclusion Professional:

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Administrative Manager

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Date of submission to DPM/BEI: December 8, 2023

Each individual or group listed below contributed to the planning, development, and implementation of the plan.

Planning, Development, and Implementation Team Members:

All members of the Equity, Diversity, and Inclusion Advisory Committee (EDIAC): Lilian Kahite (Chair), Karyn Culver (Vice-Chair), Deena Driese (former member), Monica Hale, Shasta Hoffhein (former member), Kendra Lazzeroni, Sarah Smith, Kristina Thole, Moua Yang.

Contributors and other subject matter experts consulted:

Molly Pappenheim, Andrea Davenport (former member), Alicia Hanley, and Nicholas Wittwer. Senior Management Team (SMT): Nathan Houdek, Rachel Cissne Carabell (former Deputy), Sarah Smith, Lauren Van Buren, Kristina Thole, Jesse Patchak (former Director of Operations Management), Amy Malm, and Rebecca Rebholz

Others as appropriate: None

Introduction (Alignment with Vision, Mission, and Values)

OCI's mission is to protect and educate Wisconsin consumers by maintaining and promoting a strong insurance industry. We can only achieve this mission with an equally strong workforce. By incorporating Diversity, Equity, and Inclusion into the core areas of recruitment, retention, and agency culture, we can identify and address barriers impacting our employees and, in turn, the stakeholders we serve.

OCI's Equity, Diversity, and Inclusion Advisory Committee (Committee) developed this Equity and Inclusion Plan (Plan) with input from coworkers, including the prospective committee members named above, and OCI's Senior Management Team (SMT). From March through August 2023, the Committee met at least once weekly to discuss strategies in plan development. We revised our

2021 – 2023 plan and identified new measures to implement. Throughout the planning process, the Committee consulted with the Commissioner and the former Deputy Commissioner to integrate feedback into the plan. In addition, SMT encouraged the Committee to attend training, either through Cornerstone or the NAIC, related to Insurance, Race, Equity, and Inclusion to gain a better understanding of these important topics. Several committee members attended the suggested trainings and were able to bring ideas back to the planning and developing team. The Chair, Vice Chair, and EDI Officer attended Bureau of Equity and Inclusion (BEI) monthly meetings and training sessions.

Through discussions and review of available data, the Committee identified education and communication as key strategies to promote Equity, Diversity, and Inclusion. The Plan lays the foundation for OCI staff to better understand how racism, discrimination, and bias perpetuate disparities within OCI as well as within the insurance sector. In addition, OCI gathers data to better understand the demographics within the industry we regulate. While this Plan specifically identifies goals and strategies within OCI, our agency is also leading these conversations on both the state and national levels. Multiple SMT-level OCI staff, including Commissioner Nathan Houdek and Former Commissioner Afable, have contributed to the National Association of Insurance Commissioners (NAIC)'s Special (EX) Committee on Race and Insurance. This subcommittee is charged with determining which barriers disadvantage people of color and/or historically underrepresented groups in the Life Insurance and Annuities lines of business.

In accordance with Region 1 requirements, all OCI employees must complete two tiers of Equity and Inclusion training, totaling 65 minutes. All supervisors are required to complete an additional two tiers, 100 minutes in length, bringing their total time spent to 165 minutes. Supervisors are required to annually earn eight hours of continuing education credits and one of the approved training topics is diversity. In 2023 we promoted a seven-hour NAIC course, Introduction to Diversity, Equity, & Inclusion for Regulators, all OCI staff were encouraged to attend. In addition to this required training, each member of the planning and development team brings a unique and individual perspective. Many contributors are classified as minorities. One contributor has a Bachelor of Arts in women's and gender studies, another holds a Senior Professional in Human Resources (SPHR) designation. Participation in the development included providing input, attending scheduled meetings, participating in training and discussion about course offerings applicable to our staff that were consistent with the Plan and its goals. They gathered information collected in the survey as well as informal employee communication that non contributors expressed.

OCI will continue to build on initial and ongoing education and training for employees and the insurance industry. The Plan helps guide OCI to gather and maintain data which will allow us to assess our current status and monitor expected improvements based on strategies outlined within the Plan. This is a living, breathing document that will evolve as our knowledge, experience, and data grows. Additionally, while the Plan was developed and reviewed by the Committee, it will take continuous and genuine efforts within all levels of the organization to meet our goals in recruitment, retention, and agency culture. Wisconsin has been a leader and pioneer in the fight for equality and equal opportunity. More can and must be done, and OCI is committed to this task.

- OCI Equity, Diversity, and Inclusion Advisory Committee

Office of the Commissioner of Insurance Equity and Inclusion Commitment Letter

The **Office of the Commissioner of Insurance (OCI)** hereby reaffirms our commitment to the principles of equity and inclusion for all employees and applicants without regard to an individual's race, color, sex, religion, national origin, age, disability, genetic information, or marital status.

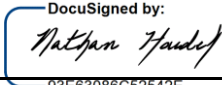
OCI is firmly committed to meeting the state laws and policies and federal laws for equal employment opportunity and affirmative action. **OCI** recognizes that equal employment opportunity is a legal, organizational, and economic necessity to ensure equity and diversity of the state's workforce. This commitment extends to all job applicants and employees in every type of position, including unclassified, classified, project, limited term, and intern personnel.

As part of **OCI's** commitment to this overall process, we intend to apply equity and inclusion principles to all employment policies, procedures, and programs to ensure equal employment opportunity and freedom from discrimination, including recruitment, selection, job assignment, training, compensation, benefits, discipline, promotion, transfer, layoff, and termination processes. Employees and applicants with disabilities will receive reasonable accommodation.

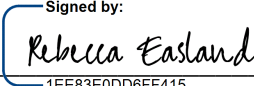
OCI has developed and committed to maintaining a written Equity and Inclusion Plan. This Affirmative Action Plan has my total support, and **OCI** pledges its best good faith efforts to achieve the goals identified in the Equity and Inclusion Plan. I expect each manager, supervisor, and employee of **OCI** to aid in the implementation of this program and be accountable for complying with the objectives of this Equity and Inclusion Plan. **OCI** will maintain a monitoring and reporting system to ensure compliance with the equity and inclusion mandates. The plan is available for review on the **OCI** website, intranet, and on physical bulletin boards within the agency.

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

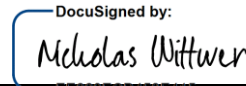
Agency Head Name: Nathan Houdek
Agency Head Title: Commissioner
Date: 12/8/2023 | 9:54 AM CST

Signature: 
93E63086C52542E...

Agency Head Name: Rebecca Easland
Agency Head Title: Deputy Commissioner

Signature: 
1EE83E0DD8FF415...

DPM Equity and Inclusion Officer Name:
Nicholas Wittwer
Date: 12/8/2023 | 10:00 AM CST

Signature: 
EE600ECD433E415...

Individuals Responsible for Directing/Implementing the Equity and Inclusion Plan

Agency Appointing Authority

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

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

Name of individual(s) responsible

Name: Nathan Houdek

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Name: Rebecca Easland

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Equity and Inclusion Officer

As delegated, the Equity and Inclusion Officer (EIO) or designee is directly responsible for developing, coordinating, and implementing the agency's EI plan. The Equity and Inclusion Officer:

- Plans, guides, and advises the appointing authority and executive leadership in establishing and maintaining equity and inclusion plans, programs, and policies. This responsibility includes engaging the appropriate individuals and stakeholders throughout the development and implementation and continuous improvement activities of plan actions.
- Develops, coordinates, and implements equity and inclusion initiatives that support the agency's equity and inclusion plan goals.
- Keeps the agency head and leadership at various organizational levels informed of EI developments, progress, and potential concerns.
- Ensures communication and dissemination of equity and inclusion plan, policy and program information, and employee access to the plan and related policies.

- Works with leadership to identify, coordinate, facilitate, or provide equity and inclusion training to increase awareness, support, and maintain compliance.
- Establishes and maintains internal monitoring, auditing, and reporting system to measure the effectiveness of the agency's programs and activities, ensure compliance, and meet state and federal requirements. This review includes gathering, researching, and analyzing data.
- Audit the hiring and promotion patterns and the selection of candidates for career development and training programs to remove barriers.
- Ensures agency selection criteria are objective, uniform, and job-related and that personnel decision-making processes adhere to EEO and AA principles.
- Promotes and coordinates agency participation in enterprise equity and inclusion programs and initiatives, including the State Student Diversity Internship program, the annual state Diversity Awards, the noncompetitive appointment for certain disabled veterans' program, the W-2 program, the disabled veteran's program, etc.
- Serves as the agency's point of contact for professional organizations and community groups to promote and assist with employment opportunities for underrepresented groups.
- Attends at least 12 hours of equity and inclusion training annually.
- Attends equity and inclusion and agency supervisory training.
- Participates in and advises the agency's Equity and Inclusion Committee as a non-voting member.

Name of individual(s) responsible

Name: Nicholas Wittwer

Title: DPM/DOA Equity and Inclusion Specialist, Senior

Email: nicholas.wittwer1@wisconsin.gov

Phone: (608) 267-1015

Equity and Inclusion Professional

The designee/professional is responsible for assisting with implementing the equity and inclusion plan efforts within their agency. The EI designee/professional:

- Ensures dissemination of all relevant equity and inclusion information to appropriate staff.
- Reviews policies, procedures, and practices and recommends changes to the EIO.
- Assists in developing, implementing, and managing oversight of policies, programs, and procedures for the administration of EI efforts for the agency.
- Assists with promoting and coordinating agency equity and inclusion programs and initiatives, including the State Student Diversity Internship program, the annual state Diversity Awards, the noncompetitive appointment for certain disabled veterans' program, the W-2 program, the disabled veteran's program, etc.
- Ensures communication and dissemination of equity and inclusion plan, policy and program information, and employee access to the plan and related policies.
- Assist the EI Officer in conducting periodic audits of recruitment activity to measure the effectiveness of efforts and activities to attain strategic equity and inclusion goals and objectives.
- Attends at least 6 hours of equity and inclusion training annually.
- Attends equity and inclusion and agency supervisory training.
- As designated, manages the agency's medical issues. This responsibility may include coordinating and monitoring the agency's FMLA and reasonable accommodation requirements to ensure compliance with the Americans with Disabilities Act (ADA).

Name of individual(s) responsible

Name: Kristina Thole

Title: Administrative Manager

Email: kristina.thole@wisconsin.gov

Phone: (608) 261-8566

HR Manager

The HR Manager is responsible for ensuring equitable and consistent administration, applying all personnel policies, and providing resources, support, and supervision of the EI Officer and professionals. The HR Manager:

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

Name of HR Manager

Name: Laura Tetting

Title: Human Resources Manager

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Phone: (608) 264-6448

Equity and Inclusion Planning and Development Team

The EI planning and development team is a representative group of agency employees selected by the appointing authority to assist with the planning and development efforts for the equity and inclusion plan. The EI Planning and Development Team:

- Reviews equity and inclusion-related data, gathers additional data as needed, recommends opportunities for improvement, and provides support and shared ownership of agency strategies and desired outcomes.
- The EDIAC and agency Senior Management Team assist with developing, writing, rolling out, and monitoring the agency's EI Strategic Plan.
- Members from the teams establish a plan for regular communication regarding the EI plan process, activities, and outcomes to build transparency, broad participation, and support.

List names of individuals role and responsibilities on the team:

Equity, Diversity, and Inclusion Advisory Committee: Lilian Kahite (Chair), Karyn Culver (Vice-Chair), Deena Driese (former member), Monica Hale, Shasta Hoffhein (former member), Kendra Lazzeroni, Sarah Smith, Kristina Thole, Moua Yang

Roles: organizing meetings; gathering information; and developing, writing, and monitoring of plan.

Contributors and other subject matter experts consulted:

Molly Pappenheim, Andrea Davenport (former member), Alicia Hanley, Katie Wheelock, and Nicholas Wittwer. Senior Management Team (SMT): Nathan Houdek, Rachel Cissne Carabell (former Deputy), Sarah Smith, Lauren Van Buren, Kristina Thole, Jesse Patchak (former Director of Operations Management), Amy Malm, and Rebecca Rebholz

Roles: gathering and interpreting collected data; and developing, rolling out, and monitoring of plan.

Others as appropriate: No other outside guidance was required.

Workforce Analysis Summary

During the spring and summer of 2023, our committee reviewed a number of reports and analyzed qualitative and quantitative data in order to complete a comprehensive workforce analysis.

Although OCI received an increase in full-time employees to 139.83 in the 2023 budget, OCI’s data was based on the previous budget with 134.83 full-time equivalent (FTE). The following data was utilized during this analysis:

- State of Wisconsin, Workforce Analysis - Demographic Information by Agency
 - CY 2020 – First Quarter (March 2020)
 - CY 2021 – First Quarter (March 2021)
 - CY 2022 – First Quarter (March 2022)
 - CY 2023 – First Quarter (March 2023)
- State of Wisconsin, 2023 Statewide Utilization Report
- OCI Separation Data (January 1, 2021 – February 28, 2023)
- OCI Exit Interview Data (January 1, 2021 – June 29, 2023)
- OCI Hire Data (Mid-August 2021 – Mid March 2023)
- OCI Applicant Data (February 2021 – April 2023)
- OCI Employee Survey Data (March 2023)

In reviewing workforce and recruitment data for OCI, any small shift in the workforce made a significant impact on our workforce analysis due to our agency’s size. In general, when comparing the total number of filled positions from the first quarters of 2020, 2021, 2022, and 2023, there was a dip in filled positions during 2021 and 2022. (Reference Graph 1 in appendix) During the same period, the majority age group of employees shifted from ages 50-59, to ages 40-49, while the youngest age group (20 – 29) stayed relatively consistent. (Reference Graph 2 in appendix)

Both of these shifts, and many more, could be a direct reflection of the impact the pandemic had on the workforce, in general, and tied to the [“Great Resignation.”](#) For instance, as the United States went into the pandemic and staff received the stay-at-home direction (March 2020), all Wisconsin state agencies were instructed to hold off hiring for positions that were not “essential” as it related to areas such as patient care, emergency management/security, or to help fight, or support the fight, against the virus. When the hold on hiring for vacant positions gradually lifted as more staff exited the workforce; OCI then had a better understanding of the impact of the pandemic.

Over the past four years, the years of service of employees has also shifted. Overall, it’s a fair assumption that the number of employees with 0 – 4 years of service is typically higher than the number of employees with 5+ years of service due to hiring efforts. As Graph 3 (in appendix) indicates, in the first quarters of 2021 and 2022, the number of employees with 5 – 9 years of service was higher than the 0 – 4 years of service but that trend reversed in 2023.

Regarding gender, OCI consistently has more female than male employees, and the race and ethnic composition of OCI has stayed relatively stagnant with the relative number of white employees significantly higher than any other category. (Reference Graph 4 & 5 in appendix) The dip in the percentage of female employees compared with total number of employees may also be

attributed to the impact the pandemic had on women. As shown in this study¹, more women left the workforce during the pandemic due to caregiving responsibilities, thus decreasing the number of female employees at OCI during 2021 and 2022.

The race and ethnicity makeup of OCI's staff largely matches the statewide demographics according to the 2020 US Census, as shown in Graph 5 of appendix. Additionally, OCI employs a slightly lower proportion of white individuals than the statewide proportion and a slightly higher proportion of Asian individuals. Identifying this information assists the agency in recruitment efforts, retention understanding, and promotion of a diverse culture.

OCI has seen an increase regarding employees self-identifying with a disability from 3% of staff during the first quarter of 2020 to over 11% of staff during the first quarter of 2023. In general, this may be a result of more awareness or of DOA requesting staff to review and update their information in STAR on a more regular basis. Similarly, there is a dip and bounce back trend which occurred with our employees identifying as veterans, which can be seen in Graph 6 of the appendix.

To comprehend some additional data points, it's important to understand job groups. Job groups are a way the federal government categorizes similar jobs with similar responsibilities. Each classification in state service is assigned to a job group. In determining the underutilization of classifications, employee data is extracted from STAR and compared to the most recent U.S. Census to determine what job groups are underutilized for women and/or minorities, either statewide or by agency. The statewide utilization table was recently updated in May 2023, effective July 1, 2023, for the next three years. In reviewing the utilization report, the only job groups that OCI currently has employed, which are considered underutilized, are Job Group 043 (IS Professionals) for women, in which we currently have two FTE assigned to that job group; and Job Group 202 (Administrative Support – Fiscal) for minorities, in which we currently have one FTE assigned to that job group. In both instances, the underutilization is statewide. Since the beginning of 2021, OCI has had 31² separations of classified, permanent positions due to resignations or retirements. Based on our previous budgeted FTE, of 134.83, which includes 4 FTE for unclassified or appointed positions, 23% of our staff have resigned or retired. The turnover rate in 2021 was 9.6% and in 2022 was 10.3%.

Of the 31 separations, 61% were resignations and 45% are within Job Group 016. In reviewing Table 1 of appendix, Job Group 016 is defined as “fiscal” and includes classifications such as the Insurance Financial Examiner series, Insurance Examiner series, Accountants, etc. and 56% of our authorized, permanent positions (filled and vacant) fall into the fiscal job group. This is the largest job group within OCI, with the next largest job groups tied at 15% each within the Job Group 002 described as supervisory (e.g., middle managers such as section chiefs, insurance program managers, etc.) and Job Group 195 described as administrative support (e.g., License Permit Program Associates, Executive Staff Assistants, Office Operations Associates, etc.) respectively.

Each exiting employee is offered many ways to submit exit interview information (i.e., via their supervisor, HR representative, online survey, completing the form, or not at all) when they complete Region 1's Resignation/Retirement/Transfer Form. Of the 31 separations, only 14 employees, or 45%, opted to provide an exit interview, and only seven employees are of the Job Group 016. Due to the small sample size, it is difficult to make overly broad assumptions as to why Job Group 016 has one of the highest turnover rates within OCI classifications. The exiting staff either declined to participate or only provided limited exit interview information, citing their concerns about future references from their supervisor. Of those who participated, some provided multiple reasons, while others chose not to answer why they were leaving OCI. Of the 45% who provided

¹ Article: [Why the Pandemic is Forcing Women Out of the Workforce.](#)

² The separation data includes staff terminating from executive branch state agencies altogether (based on the effective date they become inactive), and therefore does not include job changes within an agency or movements between agencies.

an exit interview, there were seven mentions of lack of promotional opportunities, five mentions regarding inadequate compensation/benefits, three mentions of a lack of flexible work schedule, and five mentions of either relocation or family circumstances.

As OCI recognizes the disparity of race and ethnicity makeup in its workforce, the agency has made a conscious effort in recruitment by posting job announcements on several different websites aimed at underutilized applicants. From mid-August 2021 to mid-March of 2023, OCI has hired 45 classified employees. Of these hires, 14, or 31%, have either been identified as promotions or transfers³ in which the employee moved from a staff level position to a lead or supervisory role. Among those, 10, or 22% were movements within OCI. Of the 45 hires, 49% were female, and 18% self-identified as American Indian, Asian, Black, Hispanic, or Pacific Islander. Among the hires, 24, or 53%, have been within the Job Group 016, or fiscal, and eight, or 18%, were to supervisory positions. ((Reference Table 1 in appendix for additional breakdown of hires within the job groups used at OCI.) Within the fiscal job group, 29% hired were female, and 21% self-identified as a race other than white.

In reviewing all OCI applicant data from the middle of February 2021 to the end of April 2023, 75% of all of the applicants self-identified as white, slightly less than 50% of the applicants were female, 6% self-identified as a veteran or a veteran category that is eligible for expanded certification under s. 230.25(1g) or s. 230.25(1m), Wis. Stats., and no applicant self-identified as disabled. In comparison, 86.6% of Wisconsin's population is white and 5.3% are veterans, which indicates OCI is succeeding in reaching more diverse applicants to apply to our vacancies in relationship to both categories of race and ethnicity as well as veterans. Despite success, OCI will continue its recruitment efforts to help fill the remaining vacancies throughout the agency.

In evaluating Job Group 016 applicant data, 42% of the applicants self-identified as female, 73% self-identified as white, 9% self-identified as a veteran or a veteran category that is eligible for expanded certification under s. 230.25(1g) or s. 230.25(1m), Wis. Stats. One of the new contributing factors for this disparity could be the requirement to have a bachelor's degree in accounting (or similar) to be minimally qualified for the Insurance Financial Examiner classification series. This degree requirement was signed into law in Wisconsin in December 2021 to comply with accreditation standards from the NAIC. While this standard is necessary for OCI to retain accreditation, additional research and data are needed to determine if this is a negative impact on the diversity of applicants and hires into that classification series.

While comparing applicants, it is vital to understand additional action is needed to increase the number of diverse applicants and the diversity within OCI. It is also important to understand that some data remains unavailable. For instance, the applicant data only captures applicants that have applied to OCI's positions, or that were offered and accepted the job. It does not capture applicant data of those who made the register because they were deemed minimally qualified, nor does it capture which applicants who made the certification (interview list). Without this missing data, conclusions may be drawn that may or may not be accurate.

OCI has conducted multiple internal engagement surveys over the last few years and has been able to draw conclusions and identify trends within our organization. For instance, over 83% of our staff would recommend OCI as a good place to work. Other survey results indicate most OCI employees agree the agency has a respectful, inclusive culture. The survey also contained open-ended questions giving us feedback as to how our SMT can better engage with OCI employees. Some of those responses led to the Commissioner's Corner, OCI's monthly newsletter, and more "real-time" updates regarding legislation or positions on legislation that will impact our agency.

To continue to encourage regular feedback, OCI has anonymous employee suggestion boxes in each floor's kitchen and a virtual suggestion box. The Commissioner's Unit also held listening

³ The distinction between promotions and transfers are based on the civil service definitions and the data has been analyzed to include a broader definition that reflects mainstream assumptions about promotions.

sessions to obtain more streamlined communication between employees and agency leaders. Some staff from each area of the agency were invited to attend, participate, and share insights and feedback with agency leadership directly. All participants found the exercise meaningful and were glad to have the opportunity. The discussions led to dialogue between the attending staff that resulted in new proposals and recommendations for agency leadership to consider and provided qualitative data that added depth to the quantitative staff survey data. For example, we found that small group discussion participants agreed with the survey results indicating general satisfaction with their job. Staff expressed that they enjoyed working at OCI because they were interested in giving back to the community and found fulfillment in the public service our agency provides. The small group discussions also expanded on the data from the agency culture part of the survey. Participants in the discussion shared insights into their experience working with coworkers of different backgrounds or with diverse beliefs. These discussions were often collaborative and provided ideas towards next steps for supporting an inclusive and respectful culture.

Internal and External Communication of Equity and Inclusion Plan

Internal Communication

- A copy of the Equity and Inclusion Plan will be available on [OCI's Equity, Diversity, and Inclusion](#) intranet page, or in a print copy to anyone who requests it. As requested, the agency will make the plan available in alternative formats.
- A physical copy of the plan can be found in the kitchen on the eighth and ninth floors of the Administration building at 101 E Wilson Street Madison, WI 53703.
- Notification about the new plan will be sent by the Commissioner's Office to all staff no later than January 31, 2024.
- A memorandum detailing the location of the Equity and Inclusion Plan and the responsibility to read, understand, support, and implement equal opportunity and affirmative action will be sent from the Commissioner's Office or the Director, Office of Administrative Services, to all staff on an annual basis.
- The Director, Office of Administrative Services, in conjunction with the Equity and Inclusion Implementation Team, will help introduce the plan to OCI employees by participating in an agencywide staff meeting during the first quarter (Q1) of 2024. Any new employees starting at OCI throughout the year will be informed of the EI Plan during orientation.
- Quarterly New Hire/Committee meetings to introduce each OCI Committee and be available for questions and comments from the new hires..
- The Director, Office of Administrative Services, in conjunction with the Public Affairs Director will utilize the Commissioner's Corner monthly newsletter to communicate with employees about the plan's strategies and progress. The Commissioner's Corner will also respond to any questions and feedback received through the OCI suggestion boxes.
- The Chair of OCI's Equity, Diversity, & Inclusion Committee will meet with OCI's Senior Management Team at least quarterly during the plan cycle to discuss progress of the plan, feedback of activities and events presented, how information is being communicated, and additional parts of the plan that need to be implemented.
- Nondiscrimination and equal opportunity statements and posters are prominently displayed and available in areas frequented and accessible to employees. Examples of signs displayed include: Equal Employment Opportunity is the Law, Employee Rights Under the Fair Labor Standards Act, and the Americans with Disabilities Act Notice to the Public.

External Communication

- OCI's Equity and Inclusion Plan is available on its public website at <https://oci.wi.gov/Documents/AboutOCI/OCIEquityInclusionStrategicPlan.pdf> or in a print copy to anyone who requests it. As requested, the agency will make the plan available in alternative formats.
- All agency job postings will include an updated EEO statement per DOA HR/Region 1 (HRSS) guidelines. The following statement or equivalent is on OCI's current postings: "We are an Equal Opportunity and Affirmative Action employer seeking a diverse and talented workforce. If you are a veteran with a 30% or greater service-related disability and are not currently employed in a permanent position with Wisconsin State Government, please send a cover letter, resume, DD-214 (honorable discharge), and documentation of your service-connected disability rating (dated within 12 months)".
- Nondiscrimination and equal opportunity statements and posters are prominently displayed and available in areas frequented by and accessible to members of the public. Examples of signs displayed include: Equal Employment Opportunity is the Law, Employee Rights Under the Fair Labor Standards Act, and the Americans with Disabilities Act Notice to the Public.
- A physical copy of the Equity and Inclusion Plan will be available to contractors, vendors, and members of the public at the following address: 101 Wilson Street, Madison, WI 53703.

Agency Internal Monitoring Plan and Process

OCI will monitor the Plan on a regular basis through monthly EDIAC meetings, Senior Management meetings, and All Staff meetings.

Some of the ways in which OCI will evaluate the Plan will be:

- Monitor and evaluate our recruitment strategies to increase the events with positive results and eliminate those with negative results.
- Analyze data from surveys and take action on those area that need improvement.
- Advise agency leadership of plan effectiveness and make recommendations to modify and improve performance where necessary.
- Monitor participation in agencywide events to determine the needs and wants of agency staff.
- Monitor records of employment activity to include hires, transfers, promotions, resignations, retirements, and reclassifications.
- Track and review educational and training data to analyze the connection between additional training and employee movements.

**Equity and Inclusion Strategic Plan
Office of the Commissioner of Insurance
Goals and Strategies**

Each agency should identify broad goals from its workforce analysis to address barriers to advancing equity and inclusion in each equity and inclusion focus area (Recruitment, Retention, and Agency Culture). Once those goals are identified, the agency planning, and development team will identify strategies to address the barriers. Each strategy chosen is included in the agency EI workplan.

Overarching Goals for EI	Strategies to Achieve Goals
<p>Recruitment Goal</p> <p>Actively recruit a workforce which represents the diversity of the citizens and our community.</p>	<ul style="list-style-type: none"> • Promote EDI as a strategic priority. • Review job announcements and posting processes to increase our employee levels of diversity to mirror the available workforce. • Continue recruitment methods to obtain a more diverse pool of applicants.
<p>Retention Goal</p> <p>Maintain an equitable and inclusive work environment with an emphasis on increasing internal promotions and decreasing our turnover rate for underrepresented employees.</p>	<ul style="list-style-type: none"> • Educate and communicate opportunities for career advancement and personal/professional growth. • Optional anonymous review processes. • Develop and distribute staff Engagement survey.
<p>Agency Culture</p> <p>Promote a respectful culture that values diversity, supports equity and is actively inclusive.</p>	<ul style="list-style-type: none"> • Review results of staff Engagement survey including trends from current and previous surveys. • Foster open communication among all levels of staff. • Ensure regular ongoing communication among the Equity, Diversity, and Inclusion Advisory Committee, OCI leadership and employees. • Strengthen staff and leadership knowledge, understanding and competency in EDI. • Analyze key EDI metrics. • Create ways to increase staff sense of belonging and engagement at work through agency initiatives.

Equity and Inclusion Strategic Plan – Workplan

The agency workplan represents the strategies and actions for the agency EI Plan. Each strategy identified to meet agency equity and inclusion goals is listed, and the actions to achieve that strategy are described. Each action implemented is part of the process of achieving specific strategic outcomes. The comprehensive selection of activities to support the strategy may include short-term and/or long-term actions. KPIs gauge the progress of the actions taken to reach the desired outcome. KPIs provide clarity to the process for reaching short-term and long-term goals and allow teams to focus on efforts that fall short and require attention immediately to stay on track. KPIs support the monitoring and continuous improvement activities of the strategic plan. Agencies should also list associated training identified to support the implementation for each focus area.

Recruitment Strategies	Actions	KPI	Outcome/Metric	Responsible staff/office	Targeted Completion Date
Promote EDI as a strategic priority.	<ul style="list-style-type: none"> • Post updated EDI documents on internal and external website and on information boards throughout agency. • Use social media to highlight EDI efforts at OCI and within the insurance industry. • Improve usability of OCI's internal and external websites for individuals with disabilities. • EDI Committee to be introduced at initial staff orientation, quarterly new employee orientation, and all-staff meetings 	<ul style="list-style-type: none"> • Up to date documents posted to internal and external website • Greater # of social media postings highlighting EDI efforts at OCI • Regular internal accessibility audits of OCI's internal and external websites 	<ul style="list-style-type: none"> • Have at least 1 social media posting per month related to EDI • Full compliance with Web Content Accessibility Guidelines (WCAG) 2.0 AAA 	Office of Public Affairs & OAS Director	January 2024 and Ongoing

<p>Review job announcements and posting processes to increase our employee levels of diversity to mirror the available workforce.</p>	<ul style="list-style-type: none"> • OAS Director and DOA HR review job announcements to ensure postings encourage individuals with diverse backgrounds to apply. • Post job announcements on more than just the Wisc.Jobs website, for the maximum amount of time to get a wider range of people to apply. • Create job announcement language promoting the three Committees at OCI. (EDI Advisory Committee, Wellness Committee, OCI Gives Back Committee) 	<ul style="list-style-type: none"> • # of job announcements reviewed • # of additional websites posted to 	<ul style="list-style-type: none"> • 100% of all announcements will be reviewed • Increase racial/ethnic minorities representation of candidates during the hiring process from OCI Applicant Data (February 2021-April 2023) 	<p>OAS Director in coordination with DOA HR and Public Affairs</p>	<p>Ongoing</p>
<p>Continue recruitment methods to obtain a more diverse pool of applicants.</p>	<ul style="list-style-type: none"> • Explore additional career fairs and AA/EEO programs, including internship and sponsorship opportunities. • Explore outreach and networking opportunities with professional associations for diverse insurance professionals. • Collaborate with institutions of higher education. • Identify relatable education, training, or work for positions being posted. 	<ul style="list-style-type: none"> • Attend a minimum of five outreach/career fairs including those aimed at diverse audiences • # of speaking engagements with institutions of higher education 	<p>Increase representation of racial/ethnic minorities at different levels of the agency year after year</p>	<p>OAS Director in coordination with hiring managers, Senior Management, DOA HR, and OCI EDI Advisory Committee</p>	<p>Ongoing</p>

	<ul style="list-style-type: none"> Promote OCI Committees (EDI Advisory Committee, Wellness & Give Back). 				

Associated Recruitment Staff Training
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Retention Strategies	Actions	KPI	Outcome/Metric	Responsible staff/office	Targeted Completion Date
Educate and communicate opportunities for career advancement and personal/professional growth.	<ul style="list-style-type: none"> Analyze promotional movements to and within OCI. Identify and offer educational training opportunities to employees regarding career and personal growth (e.g., how to apply for promotions, mock interviews, etc.) Educate employees regarding their position and pay range. Update internal training website including designations, progressive series, promotional opportunities. 	<ul style="list-style-type: none"> Evaluate # of employee promotions to and within OCI Provide a minimum of two trainings per year which focus on career or personal growth 	<ul style="list-style-type: none"> Increase # of diverse employees promoting to and within OCI Evaluate participation in trainings to find possible trends 	OAS Director, employee supervisor, and OCI EDI Advisory Committee	Ongoing
Optional anonymous review processes.	<ul style="list-style-type: none"> Review and evaluate different options for a 360 review processes. Review Exit Interview process and encourage employee participation. 	<ul style="list-style-type: none"> % of additional reviews # of Exit Interviews done 	<ul style="list-style-type: none"> Evaluate participation in 360 review process Determine pros and cons of the optional processes 	OAS Director in coordination with employee supervisor	September 2025

			<ul style="list-style-type: none"> • Increase participation in Exit Interviews 		
Develop and distribute staff Engagement survey.	<ul style="list-style-type: none"> • Maintain subcommittee responsible for creating and executing an Engagement/Perspective survey. • Develop an action plan to determine new agency goals identified from the survey suggestions. • Reflect on previous survey results to reevaluate questions. 	50% of surveys returned	<ul style="list-style-type: none"> • Increased # of returned surveys each year • Increase # of open-ended questions 	OAS Director in coordination with Senior Management Team; OCI EDI Advisory Committee; and Office of Public Affairs	June 2024 and Ongoing

Associated Retention Staff Training	<ul style="list-style-type: none"> • Promote: Sincerely, Your Career training through Cornerstone
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EI Culture Strategies	Actions	KPI	Outcome/Metric	Responsible staff/office	Targeted Completion Date
Review results of staff Engagement survey including trends from current and previous surveys.	<ul style="list-style-type: none"> • Analyze Engagement survey results to identify outliers and minority and majority groups within the agency. • Communicate results, as appropriate, to SMT and employees. • Review actionable items to determine implementation. 	% of responses to open-ended questions	Utilize survey results to assess strategic priorities for the equity and inclusion plan	OAS Director in coordination with Senior Management Team; OCI EDI Advisory Committee; and Office of Public Affairs	June 2024 and Ongoing

<p>Foster open communication among all levels of staff.</p>	<ul style="list-style-type: none"> • Continue to support anonymous ways to make comments, complaints and/or suggestions; then review the information received and address actionable items on an ongoing basis. • Create more opportunities for direct communication among staff including direct interaction through agency events/activities. • Have 2-4 “All Staff” meetings per year. 	<ul style="list-style-type: none"> • # of intra-divisional collaborative meetings • % of feedback/comments received through surveys, suggestion boxes, and verbal communication 	<ul style="list-style-type: none"> • 100% of actionable suggestions are addressed • Increase in open-ended communication from staff 	<p>Senior Management and OCI EDI Advisory Committee</p>	<p>Ongoing</p>
<p>Ensure regular ongoing communication among the Equity, Diversity, and Inclusion Advisory Committee, OCI leadership and employees.</p>	<ul style="list-style-type: none"> • EDI Advisory Committee and Senior Management meet at least quarterly regarding updates from both parties. • During all staff meetings, have Senior Management address any issues/comments relating to EDI as appropriate. • EDI Resources obtained from the insurance industry are shared with OCI staff. 	<p># of communications regarding EDI related information</p>	<p>Committee will have constant communication with Senior Management regarding all agency events/activities</p>	<p>OAS Director in coordination with Senior Management Team and OCI EDI Advisory Committee</p>	<p>Ongoing</p>
<p>Strengthen staff and leadership knowledge, understanding and competency in EDI.</p>	<ul style="list-style-type: none"> • Ensure all staff obtain mandatory annual EDI training. 	<p>Promote or distribute information at least twice a year to increase the competency and</p>	<ul style="list-style-type: none"> • Increase staff awareness of OCI EDI Advisory 	<p>Senior Management and OCI EDI Advisory Committee</p>	<p>Ongoing</p>

	<ul style="list-style-type: none"> • Provide ongoing EDI training opportunities. • Encourage OCI participation in NAIC EDI activities. • Welcoming session regarding OCI Committees and their functions. • Update internal HR & the EDI Advisory Committee webpages to differentiate roles and responsibilities. 	comfort of EDI issues	<p>Committee's purpose.</p> <ul style="list-style-type: none"> • Increase staff knowledge and participation in EDI training opportunities 		
Analyze key EDI metrics.	<ul style="list-style-type: none"> • OAS Director obtains demographic reports of agency. • OAS Director reviews reports regularly. 	<ul style="list-style-type: none"> • Monthly communication with all staff regarding employment transitions • Yearly update with Senior Management and EDI Advisory Committee on EDI metrics 	Evaluate data to identify modifications needed to the EDI strategic plan	OAS Director in coordination with DOA/DPM and OCI EDI Advisory Committee	Ongoing
Create ways to increase staff sense of belonging and engagement at work through agency initiatives.	<ul style="list-style-type: none"> • OCI Committees host events and/or training opportunities to engage all units of the agency. • OCI Committees host events in correlation to the Well WI Incentive • Promote Committees' internal webpages for information on events and activities. 	<ul style="list-style-type: none"> • # of events held, which are a collaborative effort among committees • Track how often Committees' pages are accessed • % of Wellness incentive recipients 	Increase % of employees participating in events/accessing information	OCI EDI Advisory Committee, OCI Wellness Committee, OCI Gives Back Committee, and Public Affairs Unit	Ongoing

	<ul style="list-style-type: none">• Continue interactive information/activities on bulletin boards.• Include a short survey after trainings and events to gauge satisfaction level of training or event.				

Associated Culture Staff Training	<ul style="list-style-type: none">• EDI Employee Tier 1-2 and EDI Supervisor Tier 1-2 training
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Implementation Plan

OCI recognizes the importance of the Equity and Inclusion Plan and is committed to ensure the Plan goals are implemented effectively.

The implementation team will be led by OCI's Equity and Inclusion Officer (EIO) and will consist of the following core group members:

- OCI Senior Management
- OCI Equity Diversity and Inclusion Advisory Committee (EDIAC)
 - These individuals will help to ensure implementation of the plan is occurring at the agency level.
- DOA DPM Equity and Inclusion Officer

The implementation of the Plan will be a standard agenda item during each OCI EDIAC meeting. During this time, any strategies and actions will be reviewed, assigned, or assessed.

Agency Implementation Stages

EXPLORATION

There are a number of new or updated actions included for our strategies, and OCI intends to determine if these actions are achievable and helpful to the EI Plan. For example, OCI will explore options for 360 reviews and determine a method of this review process that best suits OCI staff and the agency as a whole.

INSTALLATION

One strategy that has been analyzed year after year is the Engagement Survey. Each part of the survey has been reviewed to ensure questions align with the core concepts of the EI Plan. Prior to the installation of each strategy, the actions will be studied to determine if the current practice is the best practice.

INITIAL IMPLEMENTATION

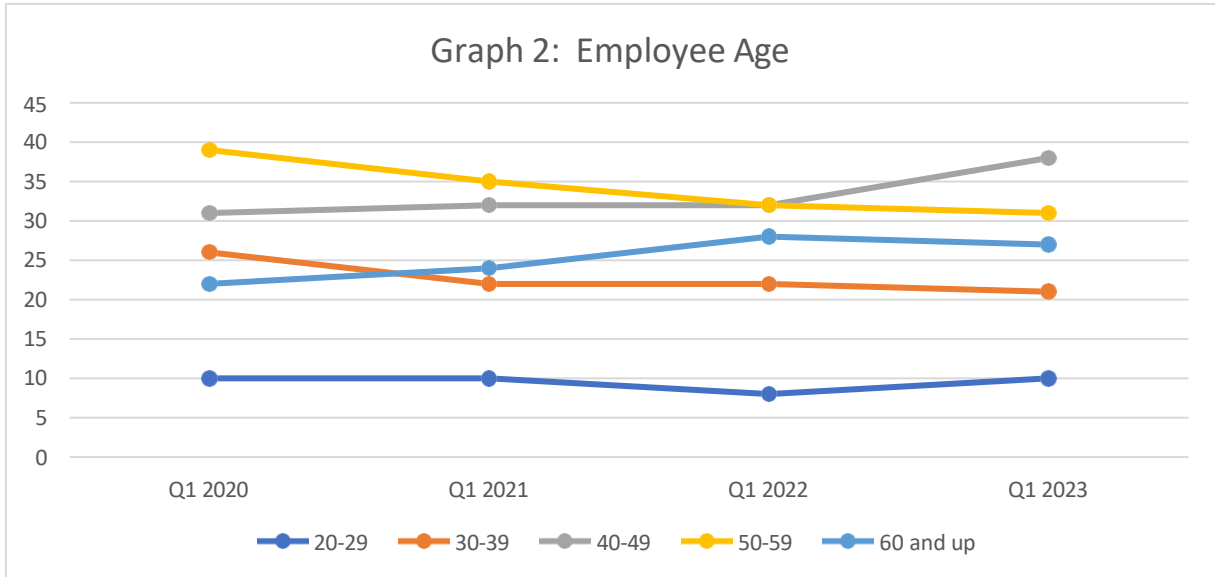
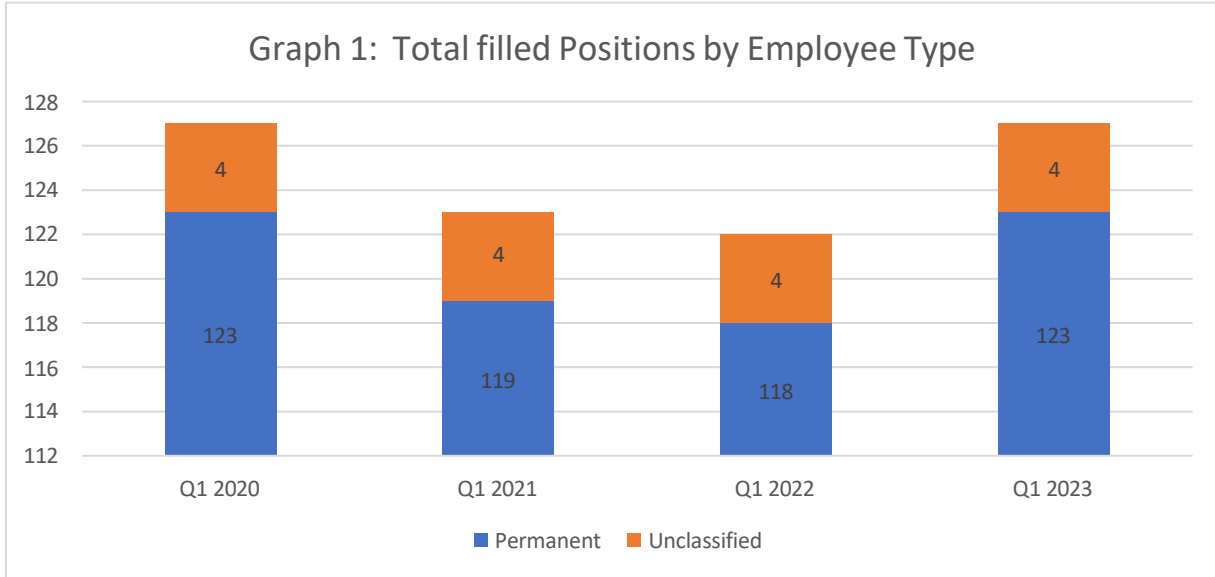
The initial implementation of this Plan is based off the workforce data provided by DOA, internal surveys, and efforts outlined in the Strategic Plan. Most of the strategies are ongoing and consistently reviewed for improvement. Those that have been identified with a specific date are intended to begin at that time because they are either a completely new strategy or have a set purpose (i.e., Engagement Survey circulated by June each year).

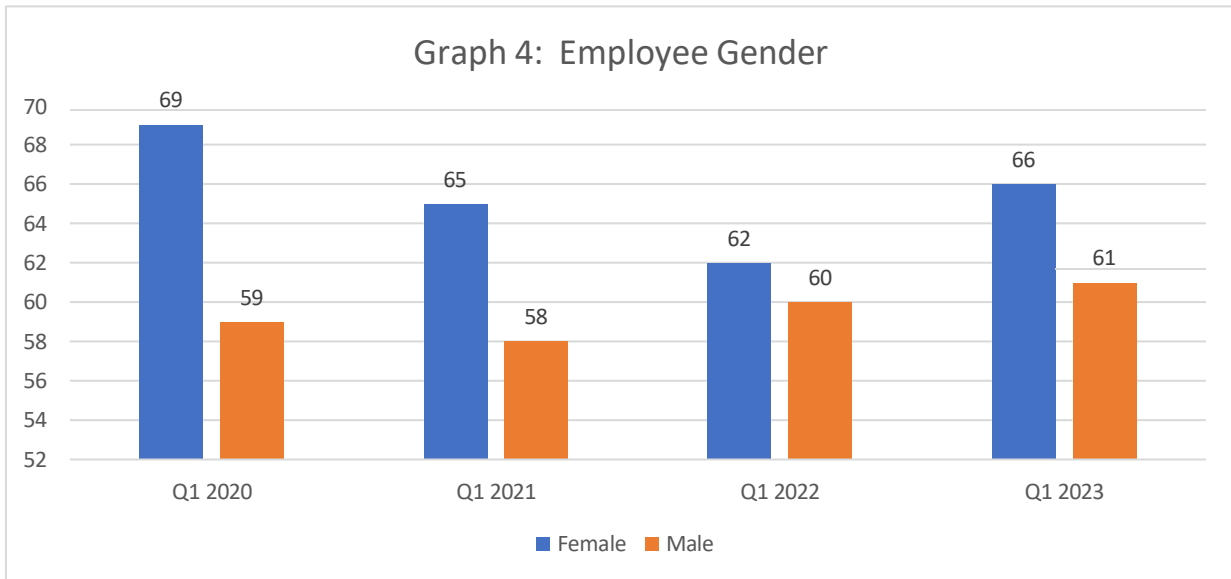
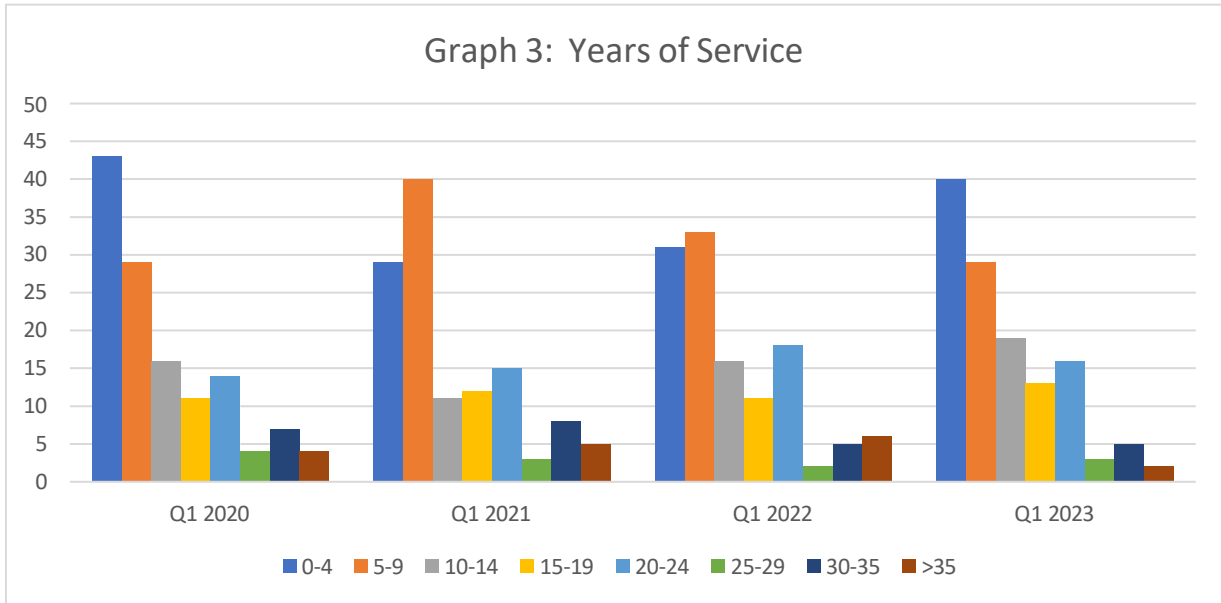
FULL IMPLEMENTATION

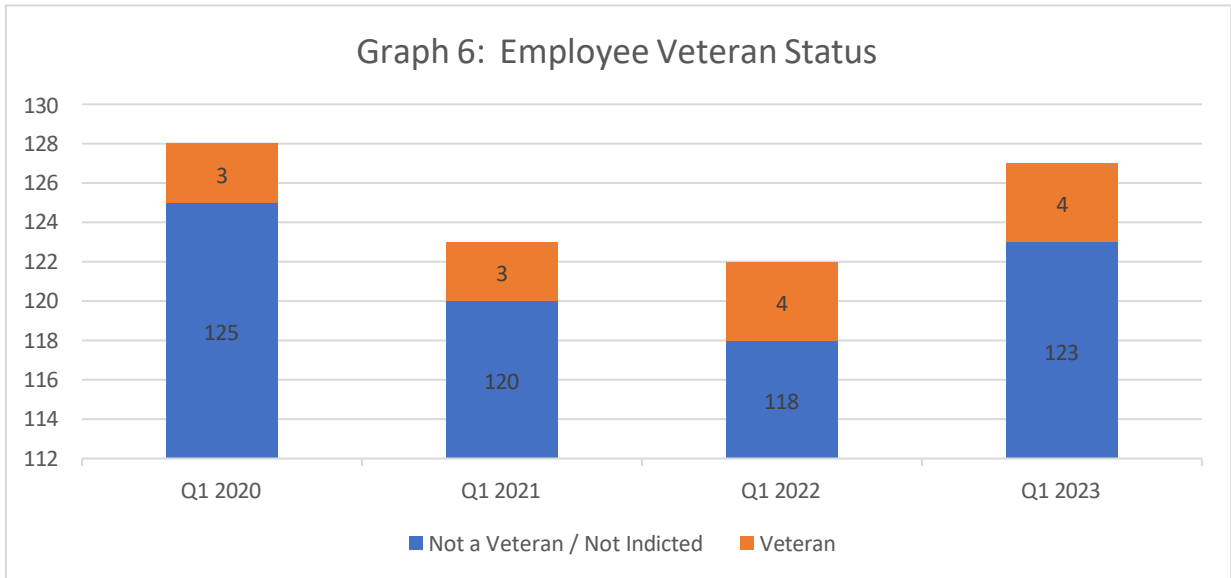
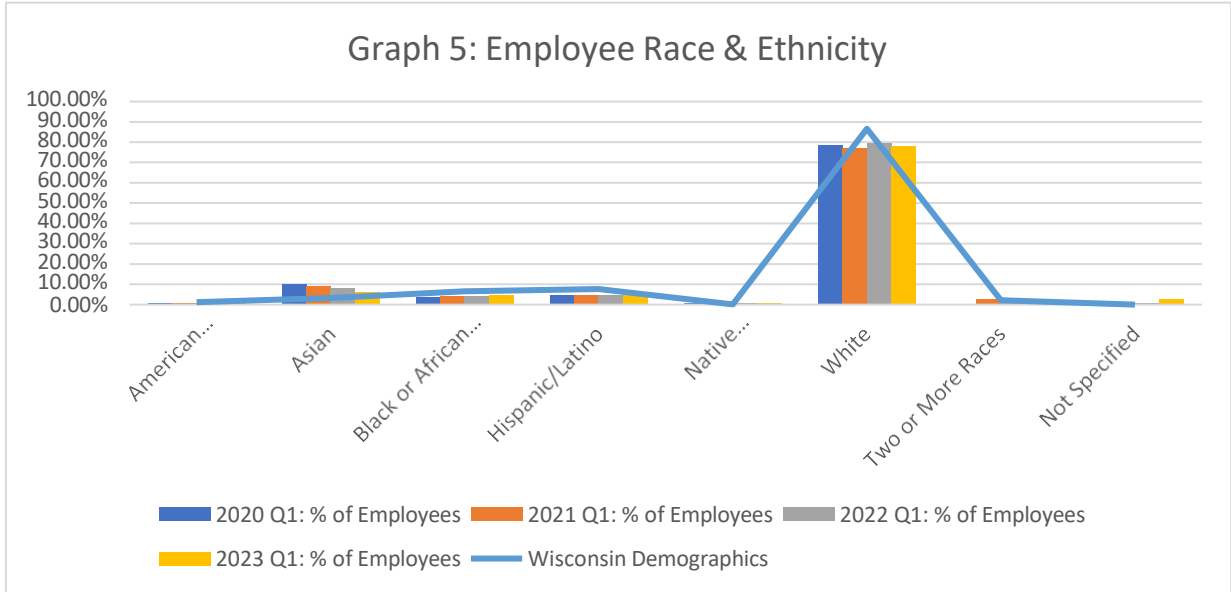
Full implementation can be achieved for our strategies that have a static stop (i.e., Promoting EDI as a Strategic Priority). Other strategies cannot be considered fully implemented due to the ongoing nature of the strategy. Once enough feedback is collected, "snapshots" of information can be reviewed to determine if OCI is on track to achieve the defined outcomes and goals.

Appendices

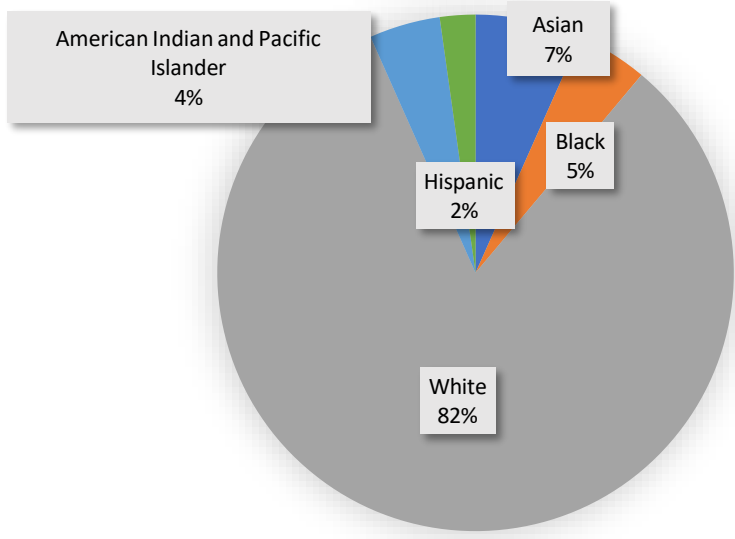
Graphs and Tables from the Workforce Analysis Section



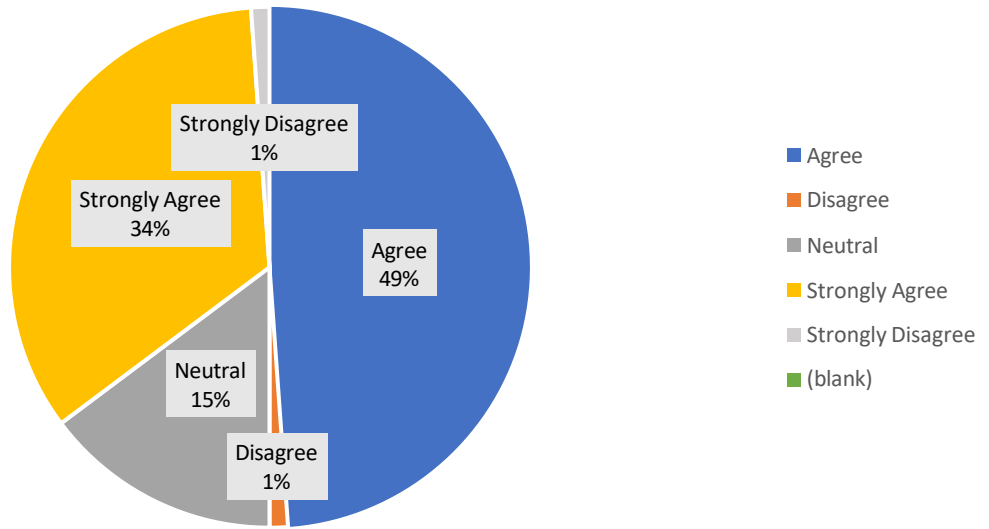




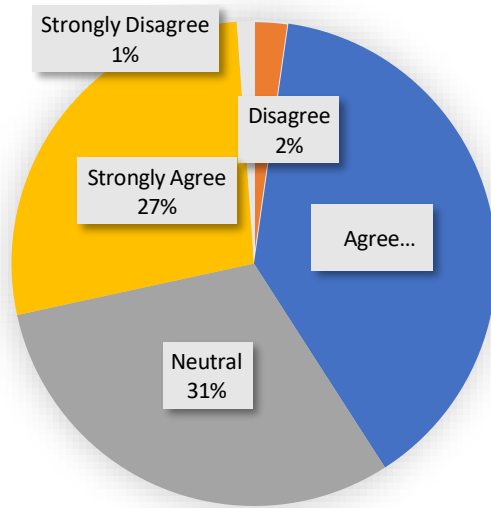
Graph 7: Race of OCI Hires



Graph 8: OCI Survey - *I would recommend OCI as a good place to work*



Graph 9: OCI Survey- *OCI provides an environment for the free and open expression of ideas, opinions, and beliefs.*



Graph 10: OCI Survey- *In general, I would say people of all cultures and backgrounds are respected and valued at OCI.*

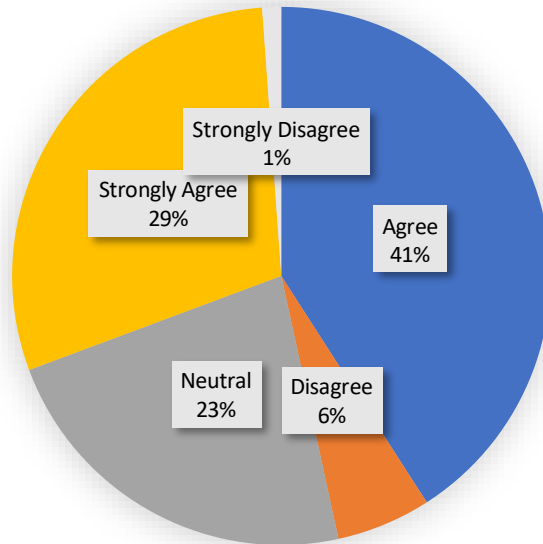


Table 1: Job Group Data

Job Group	OCI Classifications (Classified)	Classified, Permanent, Budgeted FTE (June 2023)	Separations⁴ (January 2021 – May 2023)	Hires⁵ (Mid-August 2021 – Mid-March 2023)
001 – Administrators-Senior Executives	Administrative Manager; Budget and Policy Manager; Insurance Administrator	4	1	0
002 – Mid-Level Supervisors	Attorney Supervisor; Insurance Examiner Chief; Insurance Financial Examiner; Chief Insurance Program Manager; Insurance Supervisor; Policy Initiatives Advisor – Admin; Records Management Supervisor	20	5	7
003 – Business & Program Area Supervisors	Program Assistant Supervisor – Advanced	1	0	1
016 – Fiscal	Accountant – Journey; Accountant – Senior; Budget and Policy Analyst Agency – Advanced; Insurance Examiner, Journey, Senior, Advanced Insurance Financial Examiner, Journey, Senior, Advanced, Principal; Insurance Program Specialist – Objective; Purchasing Agent – Senior	74.93	14	24
019 – Program Specialist	Administrative Policy Advisor	1	0	0
025 – Inspectors, Inspectors and Compliance	Regulatory Specialist	1	1	1
043 – IS Professionals	IS Business Automation Consultant/Administrator	2	0	0
119 – Legal Professionals and Paralegal	Attorney Paralegal	5.5	1	1
127 – Public Relations and Media Technicians	Communication Specialist Communication Specialist – Advanced	1.9	0	1
195 – Administrative Support	Consumer Complaint Program Associate; Executive Staff Assistant; License Permit Program Associate, Senior, Lead; Office Operations Associate; Operations Program Associate	18.5	8	10
202 – Administrative Support – Fiscal	Financial Specialist – Senior Financial Specialist – Advanced	1	1	1

⁴ Separations do not include movements between agencies or within OCI for classified staff.

⁵ Hires include only classified employee movements that required some form of competition.