

Equity and Inclusion Plan January 1, 2021 to June 30, 2023

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Acknowledgments

We have reviewed and firmly endorse 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 Authority:

Nathan Houdek, Insurance Commissioner

Signature/Date: 4/22/2022 | 1:54 PM CDT

Equity and Inclusion Officer (EIO):

Kristina Thole, Administrative Manager

Signature/Date: Kristina Thale 5/2/2022 | 1:33 PM CDT

Date of submission to DPM/BEI: April 11, 2022

Each individual or group listed below contributed to the development of the plan. Implementation Team Members:

Equity, Diversity, and Inclusion Advisory Committee: Lilian Kahite (Chair), Ana Careaga, Jessica Carlson, Mai Cha, Karyn Culver, Roger Frings, Monica Hale, Shasta Hoffhein, Sarah Smith, Kristina Thole, Moua Yang, Kendra Lazzeroni

Wisconsin 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, ethnicity, gender, age, national origin, religion, disability, sexual orientation, socioeconomic status, education, marital status, and language. We also recognize the importance of embracing the wide range of attributes that diversity brings to the workplace including our values, beliefs, experiences, backgrounds, and behaviors that frame how we see the world and engage with others.

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

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

OCI has developed and is committed to maintaining a written Equity and Inclusion Plan. This Plan has our total support, and OCI pledges its best good faith efforts to achieve the goals identified in the Plan. We 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 Plan. OCI will maintain a monitoring and reporting system to ensure overall compliance with the equity and inclusion mandates included in the Plan. The Plan is available for review on OCI's website and upon request at the OCI office.

We look forward to working with the Division of Personnel Management, Bureau of Equity, and Inclusion to implement and maintain culturally responsive and equitable policies and practices and to continue to build a culture of inclusion and respect.

Individuals Responsible for Directing/Implementing the Equity and Inclusion Plan

Agency Appointing Authority

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

- Communicates the direction and vision to agency leadership that ensures involvement and commitment to the agency's equity and inclusion efforts.
- Develops an equity and inclusion action plan to implement strategies that will comply
 with affirmative action, equity, and inclusion requirements, build infrastructure and
 culture committed to equity and inclusion, and incorporates equity and inclusion
 throughout the agency's work and public service.
- Engages a representative employee and stakeholder group in the planning and development process for the E&I 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 necessary authority, top management support, and resources to successfully implement their assigned responsibilities.
- Assesses and ensures internal workplace policies and procedures are equitable, culturally responsive, and promote inclusion.
- Provide professional development opportunities and resources that raise awareness, build knowledge and understanding, and encourage and promote an inclusive culture.
- Seeks advice and guidance from the Equity, Diversity and Inclusion Advisory Committee on agency E&I programs, initiatives, and policies.

Name of individuals responsible:

Name: Nathan Houdek Title: Insurance Commissioner

Email: Nathan.Houdek@Wisconsin.gov **Phone:** 608-266-2493

Name: Rachel Cissne Carabell Title: Deputy Insurance Commissioner

Email: <u>rachel.cissnecarabell@wisconsin.gov</u> **Phone:** 608-264-8126

Equity and Inclusion Officer

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

- Plans, guides, and advises the appointing authority and executive leadership in establishing and maintaining equity and inclusion plans, programs, and policies. This includes engaging appropriate individuals and stakeholders throughout development, implementation, and continuous improvement activities of plan actions.
- Coordinates, develops, and implements equity and inclusion initiatives that support the agency's equity and inclusion plan goals.
- Keeps the agency head and agency leadership at various organizational levels informed of E&I 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 and reporting systems to measure the effectiveness of the agency's programs and activities, ensure compliance, and meet state and federal requirements. This includes data gathering and analysis.
- Audits hiring and promotion patterns and the selection of candidates for career development and training programs to remove barriers.
- Ensures agency selection criteria are objective, uniform and job-related, and that personnel decision-making processes adhere to EEO and AA principles.
- Promotes and coordinates agency participation in enterprise equity and inclusion programs and initiatives, including the State Student Diversity Internship program, the annual state diversity awards, the non-competitive appointment for certain disabled veteran's program, W-2 program, the disabled veteran's program, etc.
- Serves as agency's point of contact for professional and community organizations to promote and assist with employment opportunities for underrepresented groups.
- Attends at least 12 hours of E&I and agency supervisory training annually.
- Participates in and advises OCI's Equity, Diversity and Inclusion Committee as a non-voting member.
- Communicates quarterly with OCI as to status of the plan and initiatives.
- Coordinates with HR Manager to access data necessary to determine if objectives and metrics are being met; communicates with the DEI-AC on status
- Communicates with DEI-AC on current status of hires/recruitments/retentions, promotion efforts associated with minorities.
- Reports to management on regular basis as part of Sr. Management meetings status of EDI initiatives.

Name of individual responsible:

Name: Kristina Thole Title: Director, Office of Administrative Services

Email: Kristina.Thole@wisconsin.gov **Phone:** 608-261-8566

Equity and Inclusion Designees

The designees responsible for assisting with the implementation of the equity and inclusion plan efforts. The E&I designees:

- Ensure dissemination of all relevant E&I information to appropriate staff.
- Review policies, procedures, and practices, and recommend changes to the EIO.
- Assist in development, implementation, and management oversight of policies, programs, and procedures for the administration of OCI's E&I efforts.
- Assist with promotion and coordination of OCI's E&I programs and initiatives.
- Ensure communication and dissemination of OCI's E&I plan, policy and program information, and employee access to the plan and related policies.
- Assist the EIO in conducting periodic audits of recruitment activity to measure the
 effectiveness of efforts and activities to attaining strategic equity and inclusion goals
 and objectives.
- Attend E&I and agency supervisory training annually.

Name of individuals responsible:

Name: Equity, Diversity, and Inclusion Advisory Committee Title: Lilian Kahite, Chair

Email: Lilian.Kahite@wisconsin.gov **Phone:** 608-264-8114

HR Manager

The HR Manager is responsible for ensuring equitable and consistent administration and application of all personnel policies and provides direct supervision of E&I professionals. The HR Manager:

- Maintains effective working relationships with agency E&I designees.
- Provides leadership to HR staff and others to ensure personnel decision-making processes adhere to affirmative action, equal opportunity, and E&I principles.
- Ensures hiring managers and supervisors work effectively to develop and execute the E&I plan.
- Provides the EIO the support and data necessary to perform duties and responsibilities related to E&I.
- As designated, manages the agency's medical issues. This may include coordinating and monitoring the agency's FMLA and reasonable accommodation requirements to ensure compliance with the American with Disabilities Act (ADA).

Name of individual responsible:

Name: Adam Fermanich Title: Human Resources Manager

Email: Adam.Fermanich@wisconsin.gov **Phone:** 608-261-8078

Introduction

OCI's mission is to protect and educate Wisconsin consumers by maintaining and promoting a strong insurance industry. We can only achieve this mission if our workforce is also strong. Diversity, equity, and inclusion are key components of a strong workforce. By incorporating these components into the core areas of recruitment, retention, and agency culture, we can identify and address barriers impacting our employees and the public consumers we serve.

OCI's newly revamped Equity, Diversity, and Inclusion Advisory Committee (Committee) drafted this Equity and Inclusion Plan (Plan) with input from coworkers and in consultation with senior leaders. Throughout the planning process, the Committee met to discuss strategies in plan development. The Commissioner and Deputy Commissioner met with the Committee multiple times to provide feedback and to help shape and guide the plan. In addition, they encouraged the Committee to attend training sponsored by the NAIC (National Association of Insurance Commissioners) related to Insurance and Race as well as Equity and Inclusion so they could have a better understanding of these important topics. Several committee members attended.

Through discussions and review of available data, the Committee identified education and communication as key strategies to promoting equity, diversity, and inclusion. The Plan lays the foundation for OCI staff to better understand how racism, discrimination, and bias may have perpetuated disparities within OCI as well as within the insurance sector. While this Plan specifically identifies goals and strategies within OCI, it's important to identify additional activities OCI is leading within the insurance sector, nationally as well as statewide, to help identify and address barriers. Former Commissioner Afable was the co-chair for a subcommittee of NAIC's Special (EX) Committee on Race and Insurance. The subcommittee is charged with determining which barriers potentially disadvantage people of color and/or historically underrepresented groups in the Life Insurance and Annuities lines of business. In addition, OCI is researching how to best gather data to better understand the demographics within the industry we regulate.

Beginning in 2021, OCI will 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 necessarily grow as our knowledge, experience, and data grows. While the Plan was compiled by volunteers on the advisory committee, it will take sustained and genuine efforts of all OCI employees, and an ongoing commitment from the senior management team, to achieve the improvements needed 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

Workforce Analysis Summary

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

2018 State of Wisconsin Workforce Report
Vacancy Reporting, 12-31-19
OCI Demographics
Commissioner of Insurance Availability - 145
Commissioner of Insurance Utilization – 145
Commissioner of Insurance Availability Calculations – 145

State Underutilization Report 2020

Workforce Analysis – Demographic Summary (Time Frame: End of CY2019 Q3) Workforce Analysis – Demographic Summary (Time Frame: End of CY2020 Q3)

OCI Recruitment Data Summary 7.1.16-11.30.20

In reviewing data from the 2018 State of Wisconsin Workforce Report, that analyzes data from fiscal years 2017 and 2018, OCI's employees had an average of 12.9 years in state service, 49.1 was the average age of employees, while 16.8% were self-identified as minorities, and 56.8% of the workforce were women. In addition, in fiscal year 2017, OCI had 8 employee separations for a turnover rate of 5.9%. In fiscal year 2018, OCI had 12 employee separations for a turnover rate of 9.2%. In both years, 50% or more of the separations were a result of retirements. Within the last 12 months, no employees that separated from OCI elected to have an exit interview.

At the end of 2019, OCI had 95.1% of its total 129.8 FTE (Full Time Employee) vacancies filled. This indicates a vacancy rate of approximately 4.9%.

In reviewing the State Underutilization Report 2020, OCI has made improvements to hiring and retaining a diverse workforce. OCI is no longer considered underutilized in any job group for either women or minorities. However, due to statewide underutilization, all agencies are considered underutilized in certain job groups. In comparing the 2017 and 2020 underutilization data, OCI was identified as being underutilized for women in Job Group 016 (Fiscal) in 2017. However, the 2020 data indicates improvement. While OCI has not met or exceeded the availability of women in Job Group 016, OCI is within the 2 standard deviation margin and therefore OCI is no longer considered underutilized for women in this job group. Areas of improvement also remain in specific job groups as the availability of women or minorities still exceed our workforce demographics.

In comparing third quarter data for 2019 and 2020, employees that self-identified as disabled or as a veteran decreased slightly. Specifically, in the third quarter of 2019, 3.5% of OCI's employee population self-identified as disabled and 3.1% identified as a veteran; while in the third quarter of 2020, 3.3% of OCI's employees self-identified as disabled, and 2.4% as a veteran. In comparison to the enterprise data, OCI underperformed in both the disabled and veterans' categories for the third quarter for both 2019 and 2020. The third quarter for 2019

indicated the enterprise was composed of 5.2% disabled employees and 9.0% for veterans; while the 2020 data indicated no change for disabled employees and decreased to 8.7% for veterans.

In reviewing OCI's general demographics (report dated 02/10/2020), OCI is comprised of 54.40% women, 20% have self-identified as a minority (American Indian, Asian, Black, Hispanic or Pacific Islander), 16.8% have 21 years or more of State employment, and 71.2% are the age of 40 or older. 17.60% of these employees are the age of 60 or older, which indicates who is eligible (or soon to be eligible) to retire.

In analyzing recruitment information (OCI Recruitment Data Summary 7.1.16 - 11.30.20), OCI has posted 56 job announcements from July 1, 2016 to November 30, 2020. Of those, 14% were for supervisor or manager level positions, and the fiscal job group had the most announcements at 46.4%. There were 1,106 applicants that completed the application process during this timeframe, 138 applicants for supervisor or manager level positions and 503 applicants for the fiscal job group. Of the 138 applicants that applied for supervisor or manager positions, 42% were women, 18.8% self-identified as a minority, 10.8% were veterans, and 0% self-identified as disabled. Of the 503 applicants that applied for the fiscal job group, 47.7% were women, 21.3% self-identified as minority, 6.6% were veterans, and 1% self-identified as disabled.

Staff level positions make up the largest employee population at 85.6%. Of the staff level positions, 67.22% are age 40 or older and 17.76% of them are 60+ years of age. In addition, women comprise of 52.34% of the positions, while only 19.62% have self-identified as American Indian, Asian, Black, Hispanic or Pacific Islander. In contrast, first line supervisors and above (including section chiefs and managers) consist of the remaining 14.4% of OCI's employees. Women comprise of 66% of these employees, 16.6% have self-identified as a minority (American Indian, Asian, Black, Hispanic or Pacific Islander), 33.3% have been employed for 21 or more years with the State, 88.8% are 40 years or older, and 16.6% are 60 years of age or older.

In reviewing the data available to us, we have identified a lack of data in determining the number (and the details) of promotions within and to OCI positions. With a fair amount of OCI's employees eligible for retirement now or within the next few years, there will be a significant need to recruit new employees. OCI can utilize this opportunity to build a significant outreach connection in the community to increase its overall diversity at all levels within the organization. In addition, tapping into diverse applicants at the staff level positions now, enriching our retention strategies, and enhancing our culture will help ensure a strong pipeline for higher level positions in the years to come.

The Equity, Diversity, and Inclusion Advisory Committee incorporated actions into the strategic workplan to address the following key observations and feedback shared by coworkers:

• Staff raised questions about the amount of racial diversity in supervisor positions.

- They expressed a desire for increased transparency and communication about OCI's current diversity status and efforts to improve equity, diversity, and inclusion.
- Staff discussed ways to help support recruitment and retention of a diverse workforce.
- Staff asked for a way to anonymously share workplace concerns.
- Staff identified no- or low-cost, easy actions to demonstrate an inclusive culture, such as prominently displaying equal opportunity posters and including preferred pronouns in email signatures.
- The Committee discussed anticipated retirements in the upcoming months/years which will provide an opportunity to increase diversity.

Based on the quantitative and qualitative information referenced above, the committee prioritized the goals, strategies, and actions that follow as a means for objectively assessing OCI's status and making improvements going forward. Key actions in each area relate to increasing education and awareness as well as communicating, both internally and externally, OCI's long-term commitment to promoting an equitable, diverse, and inclusive workplace.

Overarching Goals and Strategies to Advance Equity and Inclusion

Goals	Strategies to Achieve Goals
Recruitment Goal	 Promote EDI as a strategic priority so potential applicants are aware of OCI's commitment in this area.
OCI will actively recruit a diverse workforce and address equity, diversity, and inclusion (EDI) when hiring across all job classifications.	 Review job descriptions and posting process with EDI in mind. Explore new recruitment methods and resources in order to promote a more diverse applicant pool
Retention Goal	Educate and communicate opportunities for career advancement and personal/professional growth. Monitor and analyze exit information data
OCI will create and maintain an equitable and inclusive work environment with an emphasis on increasing internal promotions and decreasing diversity turnover rate.	
Agency Culture OCI will promote an agency culture free of bias – a respectful culture that values diversity, promotes equity and is actively inclusive.	 Develop, distribute, and analyze a staff survey Foster open communication among staff. Ensure regular ongoing communication among the advisory committee, OCI leadership and employees Increase staff and leadership knowledge, understanding and competency in EDI Analyze key EDI metrics

Equity and Inclusion Strategic Workplan

Recruitment Strategies	Actions	КРІ	Outcome/ Metric	Responsible staff/office	Targeted Completion Date
Promote EDI as a strategic priority so potential applicants are aware of OCI's commitment in this area	 Post current EDI documents on intranet and external website Identify and use social media to highlight EDI efforts at OCI and within the insurance industry Assess usability of OCI's external web site for individuals with disabilities Identify additional actions for promoting EDI to potential recruits 	 Up-to-date documents posted to intranet and external website # of social media postings related to EDI # of additional actions explored for demonstrating EDI as a priority to potential recruits 	 At least 1 social media posting per month related to EDI Maintain usability of OCI's external website for individuals with disabilities 	Office of Public Affairs	December 2021 and ongoing
Review job descriptions and posting process with EDI in mind	 OAS Director and DOA HR review job descriptions and postings to ensure postings encourage individuals with diverse backgrounds to apply Identify relatable education, training, or work for positions being posted Post position/job openings, on more than just the Wisc.Jobs website, for the maximum amount of time to get a wider range of people to apply 	 # of job descriptions reviewed # of postings reviewed 	• 100% of all postings will be reviewed	OAS Director in coordination with DOA HR	Ongoing

• Explore new	 Obtain knowledge about job 	• # of job fairs OCI	 Close the gap for 	OAS Director	Ongoing
recruitment methods and resources in order to promote a more diverse applicant pool	fairs (for veterans, colleges, resource centers) and AA/EEO programs, including internship and sponsorship opportunities • Reach out to UW School of Business career coach for the Risk Management & Insurance major • Explore networking opportunities with professional associations for diverse insurance professionals	attends and how many are available • % of job fairs regarding the minority population • # of speaking engagements at high schools, colleges, or other recruitment sources	specific job groups where the availability of women or minorities still exceed OCI's workforce demographics	in coordination with hiring managers, Senior Management , DOA HR, and EDI Committee	

Associated Recruitment Staff Training

• Unconscious Bias in Recruitment Training

Retention Strategies	Actions	KPI	Outcome/ Metric	Responsible staff/office	Targeted Completion Date
• Educate and communicate opportunities for career advancement and personal/profess ional growth.	 Analyze promotional movements to and within OCI Offer educational training opportunities to employees on career and personal growth. (e.g. how to apply for promotions, mock interviews, etc.) 	 Evaluate # of employee promotions to and within OCI Evaluate participation in trainings 	 Close gap between % of minorities in staff level positions and % who are supervisors Increase # of diverse employees promoting to and within OCI 	OAS Director and EDI Committee	Ongoing

 Monitor and analyze exit information data 	 OAS Director will provide exit interview opportunities for voluntarily separating employees Review diversity turnover statistics frequently and report to OCI leadership, including trends from exit interviews. 	Review exit interview information for patterns and handle each situation respectfully	Trend analysis results in lower turnover rate	OAS Director and employee supervisors	Ongoing

Associated Retention Staff Training

• Inclusion Training for all OCI staff

Agency Culture Strategies	Actions	КРІ	Outcome/ Metric	Responsible staff/office	Targeted Completion Date
Develop, distribute, and analyze a staff survey	 Establish subcommittee to create and execute an engagement/perspective survey to obtain a better understanding of OCI employees' job satisfaction, work environment, level of acceptance of EDI practices, desire to be involved in workgroups/committee Analyze survey results to identify issues affecting minority groups Communicate, as appropriate, to SMT and employees 	• % of surveys returned	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 2021 and Ongoing

• Foster open communication among staff.	Evaluate options for an anonymous way to make comments, complaints and/or suggestions	Review all information received and address on an ongoing basis	100% of actionable suggestions are addressed	OCI Senior Management	Ongoing
• Ensure regular ongoing communication among the Equity, Diversity, and Inclusion Advisory Committee, OCI leadership and employees	 EDI Advisory Committee and Senior Management meet at least quarterly regarding updates from both parties During all staff quarterly meetings, have Senior Management address any issues/comments relating to EDI Resources obtained from the insurance industry are shared with OCI staff 	# of staff and management meetings where E&I Plan progress is communicated	Committee will have constant communication with Senior Management regarding all agency events/activities	OAS Director in coordination with Senior Management Team and OCI EDI Advisory Committee	Ongoing

Increase staff and leadership knowledge, understanding and competency in EDI	 EDI Advisory Committee is reintroduced explaining their objective, what they do, and how they can help Ensure all staff obtain mandatory annual EDI training Provide ongoing EDI training opportunities Encourage OCI participation in NAIC EDI activities 	• Rename Advisory Committee to meet EO #59 requirements Reintroduce Advisory Committee and have ongoing committee and/or leadership communication to agency about plan status/activities	 50-75% more involvement and awareness of the committee, what it stands for, and how an employee can help or be helped Periodically distribute information to increase the competence and comfort of EDI issues 	Senior Management and EDI Advisory Committee	Ongoing
• Analyze key EDI metrics	 OAS Director obtains demographic reports of agency OAS Director reviews reports regularly 	• # of communications to staff and leadership	Evaluate data to identify modifications needed to the EDI strategic plan	OAS Director in coordination with DOA/DPM and OCI EDI Advisory Committee	Ongoing

Associated Staff Training • Implicit Bias training for all OCI staff

Internal/External Communication Plan

Internal Methods of Communication

- A memorandum detailing the location of the Plan and the responsibility to read, understand, support, and help implement equal opportunity and affirmative action is sent from OCI's leadership to all staff on an annual basis.
- The Plan is available to all employees on the agency's internal website or in a hard copy to anyone who requests it. As requested, OCI makes the plan available in alternative formats.
- A physical copy of the Plan is available to employees at the following address: 125 South Webster Street, Madison, WI 53703.
- The Plan is reviewed quarterly. Any changes are reported to staff and an updated Plan is posted to the OCI internal website. New physical copies are also made available.
- Employee feedback about Plan changes is requested through a survey or anonymous suggestions. Surveys and suggestions are reviewed by the Committee during the next regular meeting following the feedback.
- On a semi-annual basis the Committee informs staff about the Plan activities and progress during the prior six-months.
- Nondiscrimination and equal opportunity statements and posters are prominently displayed in areas frequented by employees.

External Methods of Communication

- The Plan is available on the agency's public website at oci.wi.gov or in a hard copy to anyone who requests it. As requested, OCI makes the plan available in alternative formats.
- OCI's website homepage, letterhead, publications, and all job postings, will include the statement "an equal opportunity employer" and "women, minorities, veterans, and individuals with disabilities are encouraged to apply." The agency will also ensure a representative ratio of diverse individuals on marketing materials.
- 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 posters 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 Plan is available to contractors, vendors, and members of the public at the following address: 125 South Webster Street, Madison, WI 53703.
- Anytime there is an update to the Plan, it is reposted to OCI's public website and new physical copies are made available.