



# Town of Wellesley DEI Audit Report Summary

January 2025



# Disclaimer

## CONFIDENTIAL AND PROPRIETARY

This program and framework, including any supporting materials, is owned by Racial Equity Group LLC and is for the sole use of the Racial Equity Group clients or other intended recipients. The content may contain information that is confidential, proprietary or otherwise legally protected, and it may not be further copied, distributed or publicly displayed without the express written permission of Racial Equity Group LLC © 2025 Racial Equity Group LLC. All rights reserved.

## LEGAL DISCLAIMER

Racial Equity Group LLC is not engaged in legal, or accounting professional services. Racial Equity Group LLC disclaims liability for any damages, claims or losses that may arise from any errors or omissions in these materials, whether caused by Racial Equity Group LLC or its associates, or reliance upon any recommendation made by Racial Equity Group LLC. Please consult with your human resources, general counsel and legal team.

# Key Objectives

- ❖ **Background and Purpose**
- ❖ **Methodology and Approach**
- ❖ **Disparity Analysis: Employment, Procurement, Boards and Committees**
- ❖ **Highlights of DEI Staff Survey and Community Survey**
- ❖ **Overall Findings and Recommendations**
- ❖ **Appendix: Policy Recommendations, Strategic Action Plan and Scorecard**

# Current Political Climate Regarding DEI

- Executive Order #14151, "Ending Radical Government DEI Programs and Preferencing"
- Executive Order #14173, "Ending Illegal Discrimination and Restoring Merit-Based Opportunity"
  - Collectively the "Anti-DEIA Executive Orders"
  - Local governments can anticipate new required terms for federal grants and contracts. Federal agencies will be required to include two provisions in every contract or grant:
    - **Contract provision:** All contracts and grants require a clause advising all grant recipients, including local governments, that compliance with federal anti-discrimination laws is material to the government's payment decisions for purposes of the False Claims Act (FCA) (potentially exposing local governments to liability, damages, and penalties under the Act).
    - **Compliance certification.** The local government contracting party or grant recipient will be required to certify that it "does not operate any programs **promoting DEI that violate applicable federal anti-discrimination laws.**"
- Orders do not define timeline for implementing these instructions, must be presumed to take effect immediately.
- **Orders do not define what it means to "promote DEI" or types of "programs promoting DEI" that would violate "applicable Federal anti-discrimination laws."**
- Orders do not clarify or consider specifics of a particular DEI program, declaring instead that "DEI programs or principles, whether specifically denominated "DEI" or otherwise, constitute illegal discrimination or preferences."
- Lawsuit filed February 3rd in U.S. District Court Baltimore, seeking preliminary and permanent injunction to block both orders, as well as a declaration that both orders are unlawful and unconstitutional.
- **Wellesley's Town government DEI audit, recommendations, and action plan do not violate federal or state anti-discrimination laws.**

# Background and Purpose

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. A DEI Committee and Task Force was formed in December 2021 and in July 2023, the Town requested proposals to conduct an equity audit.

The scope of work included the following:

- Measure the diversity of the Town's workforce, boards, and committees.
- Deliver services in an equitable, caring, fair, and inclusive manner.
- Increase cultural responsiveness, excellence in communication and customer service, regardless of race, ethnicity, gender, sexual orientation, age, disability, or any other protected class.
- Work with all departments to support and integrate DEI into decision making, policies, practices, and services.
- Institutionalize equity, while reinforcing inclusion and affirming diverse identities and experiences.
- Support victims of hate and bias, foster respect, and celebrate differences.

In October 2023, the Town awarded Racial Equity Group (REG) the contract to assist the Town in achieving the above objectives and deliverables.

## **Background and Purpose (cont.)**

In order to achieve the Town's objectives, REG attempted to measure the following for the Town:

- Is there equal opportunity to be employed with the Town?
- Do all residents have equal access to serve on boards and committees?
- Is there equal opportunity to do business with the Town for all vendors and contractors?
- Do all residents have equal access to Town services, receive equal treatment and quality when seeking services, and see their culture and/or social identity reflected in Town government, events and activities?
- Are best practices for advancing DEI present and active within core operations of Town government?

## Background and Purpose (cont.)

REG's framework and key deliverables:

- 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 and collect 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 sample survey** to gain insights if residents and stakeholders have equal access to Town services, programs, jobs and contracts, are treated fairly by Town staff, and receive quality services and programs.
- Conducted a **disparity 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 the Town's 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.

# Methodology and Approach

REG performed quantitative and qualitative analyses utilizing the following approaches:

- **Disparity Analysis:**

*A disparity analysis is a process of analyzing demographic group data to identify significant disparities, or "inequities."* This approach included performing statistical analyses to benchmark the Town's representation of demographic groups within employment, procurement, and boards and committees, against the Town's available workforce, available contractors, and available residents.

- **Barrier Analysis:**

*a barrier analysis 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.* Relevant data and materials provided by the Town were reviewed and analyzed to uncover potential barriers.

# Employment Disparity Analysis

Availability is an estimate of the proportion of each race/ethnic group available for employment within Town government for a given job group in the Town's reasonable recruitment area.

The following Massachusetts counties were determined to be the Town's reasonable recruitment area: *Suffolk, Middlesex, Essex, Norfolk, Plymouth, Bristol, and Worcester counties*. Overall, the availability of people of color for local government jobs is 26.4 percent. *This represents an opportunity for expanded outreach to generate a more competitive pool of qualified job candidates, not a quota.*

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%

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 counties. Source 2018 Most Recent Census American Community Survey 5-Year Estimates Equal Employment Opportunity

Source: Town of Wellesley 2023 EEO-4 Report data used for Wellesley Workforce

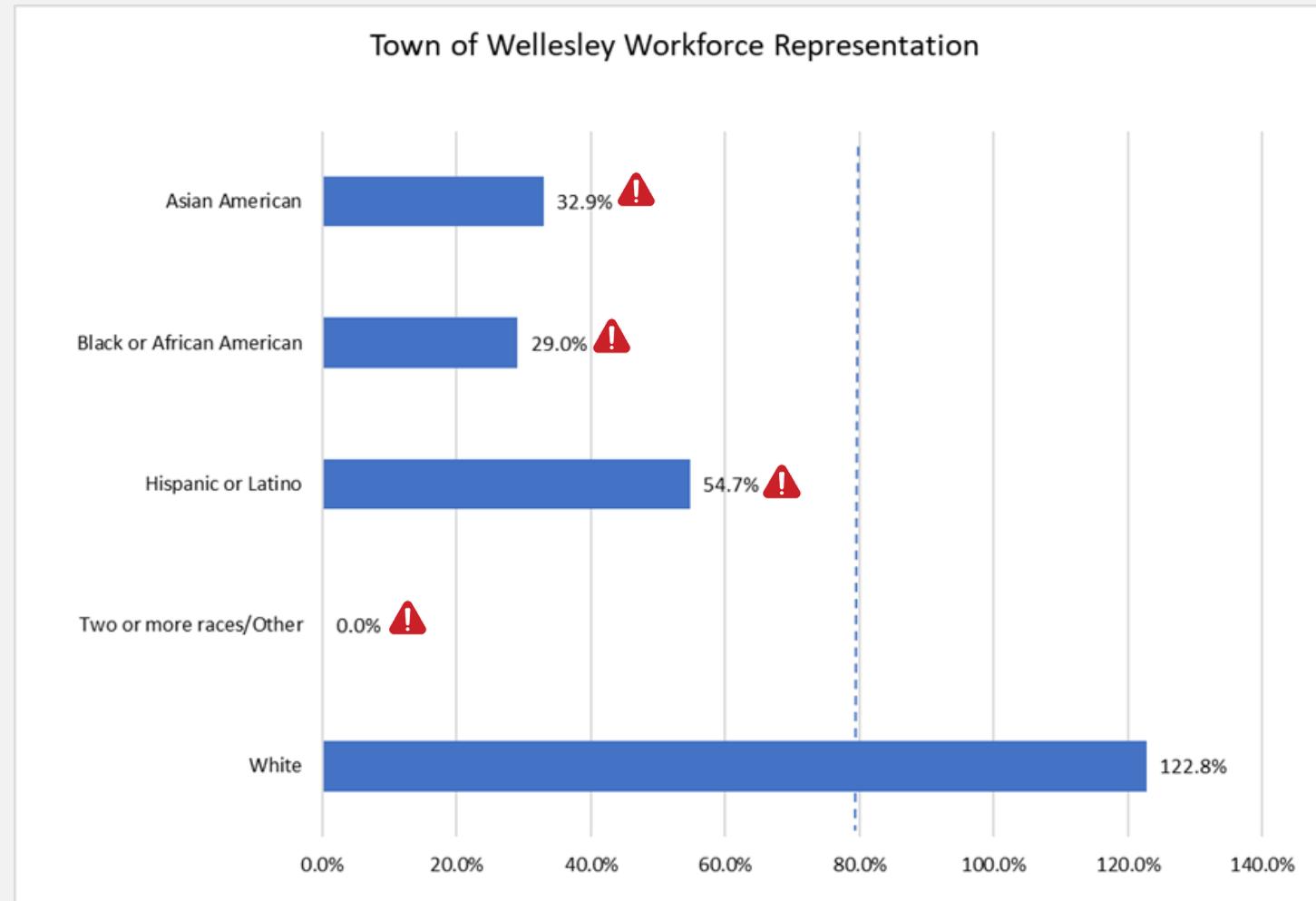
Note: Town of Wellesley Census racial demographics; 71.7% White, 6% Hispanic, 2% Black, 14% Asian, 9% two or more races.

Source, ACS Survey 2021, 5-year Estimates.

# Employment Disparity Analysis (cont.)

A disparity index of 100 indicates an exact match between representation and availability for a particular racial group, also called parity or achieving reasonable expected outcomes. An index score 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.



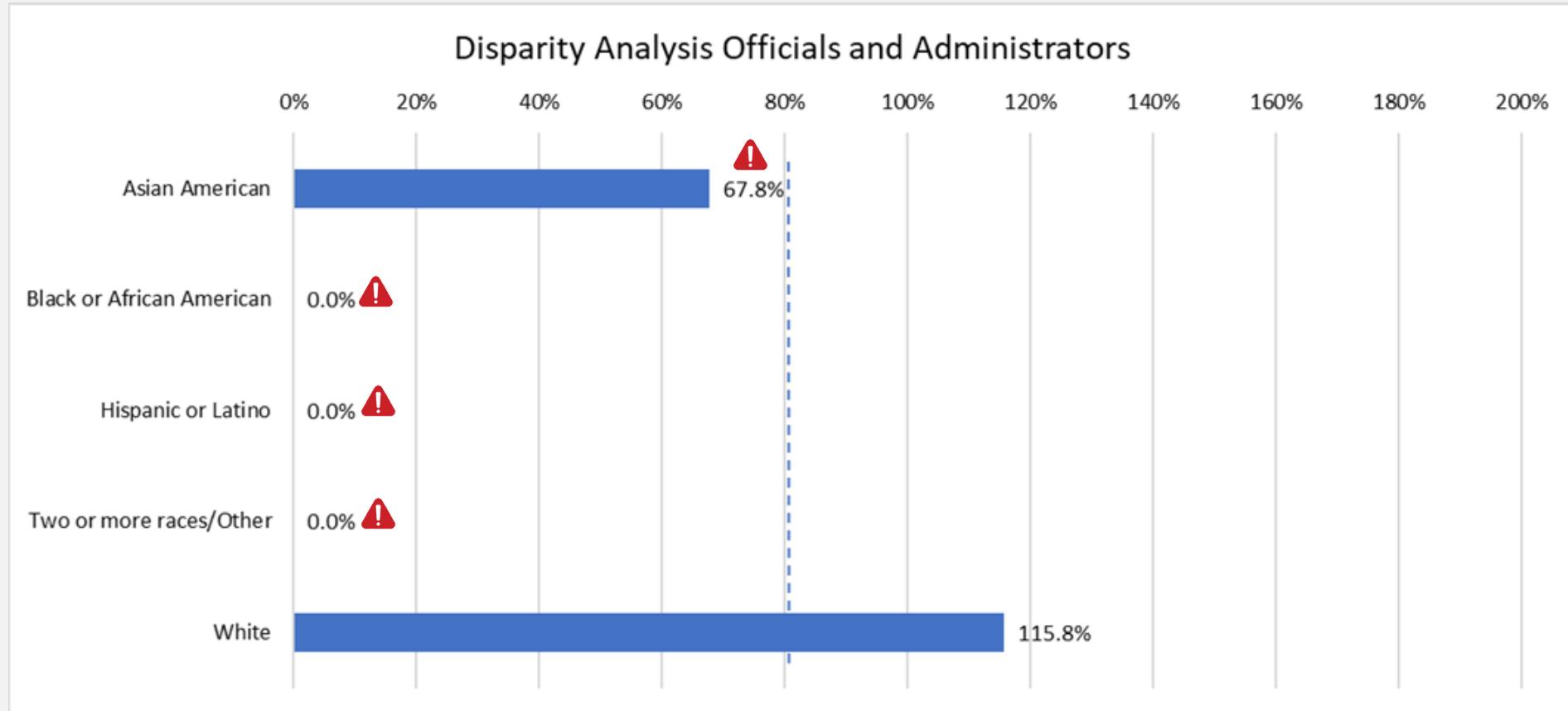
# Employment Disparity Analysis (cont.)

People of color are significantly underrepresented within the Officials and Administrators job category (e.g. management and executive), triggering racial inequities based on availability. White employees are overrepresented by 16 percent.

## Officials and Administrators:

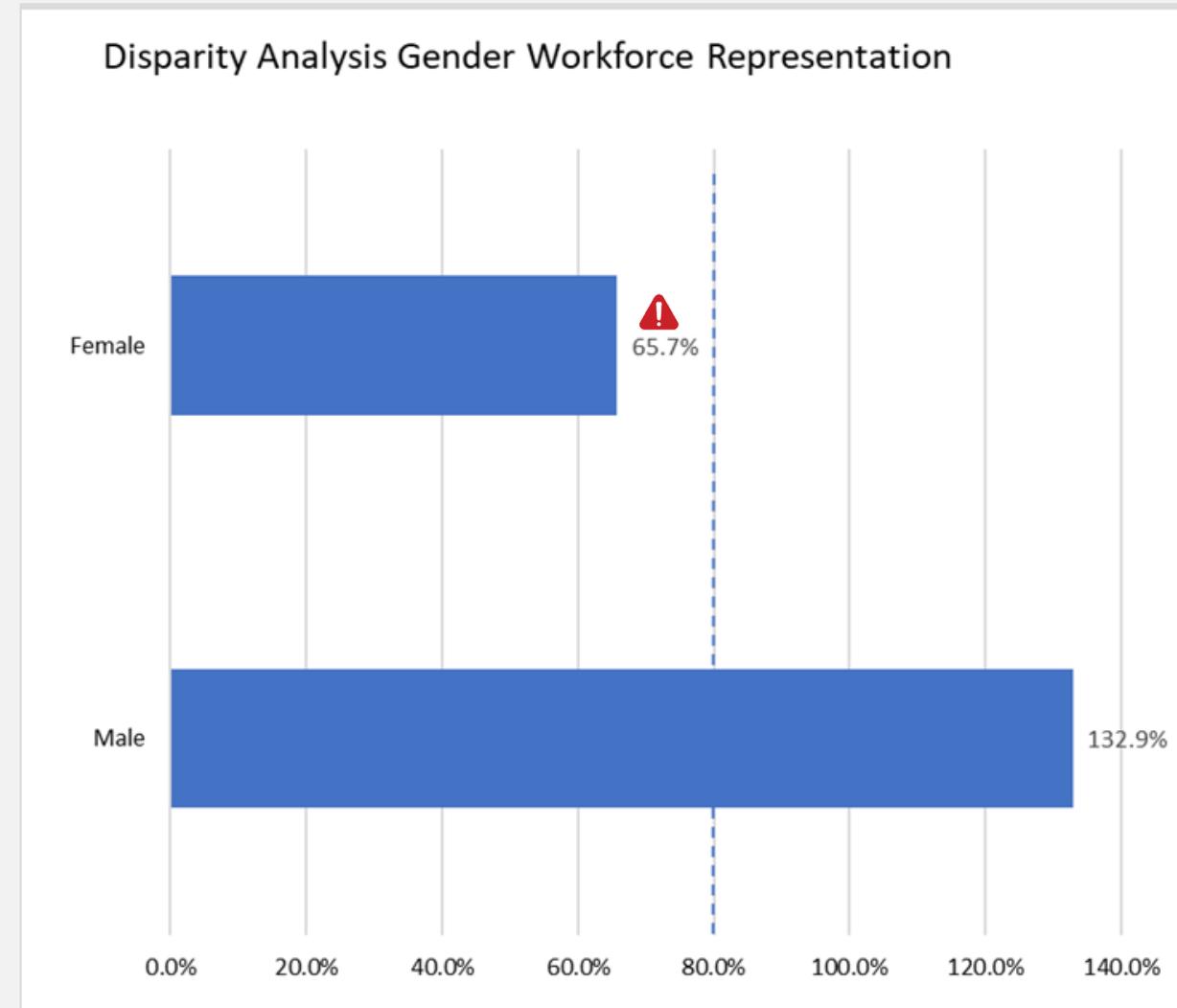
Occupations in which employees set broad policies, exercise overall responsibility for execution of these policies, direct individual departments or special phases of the agency's operations, or provide specialized consultation on a regional, district or area basis. Includes: department heads, bureau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

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 counties. Source 2018 Most Recent Census American Community Survey 5-Year Estimates Equal Employment Opportunity.



## Employment Disparity Analysis (cont.)

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

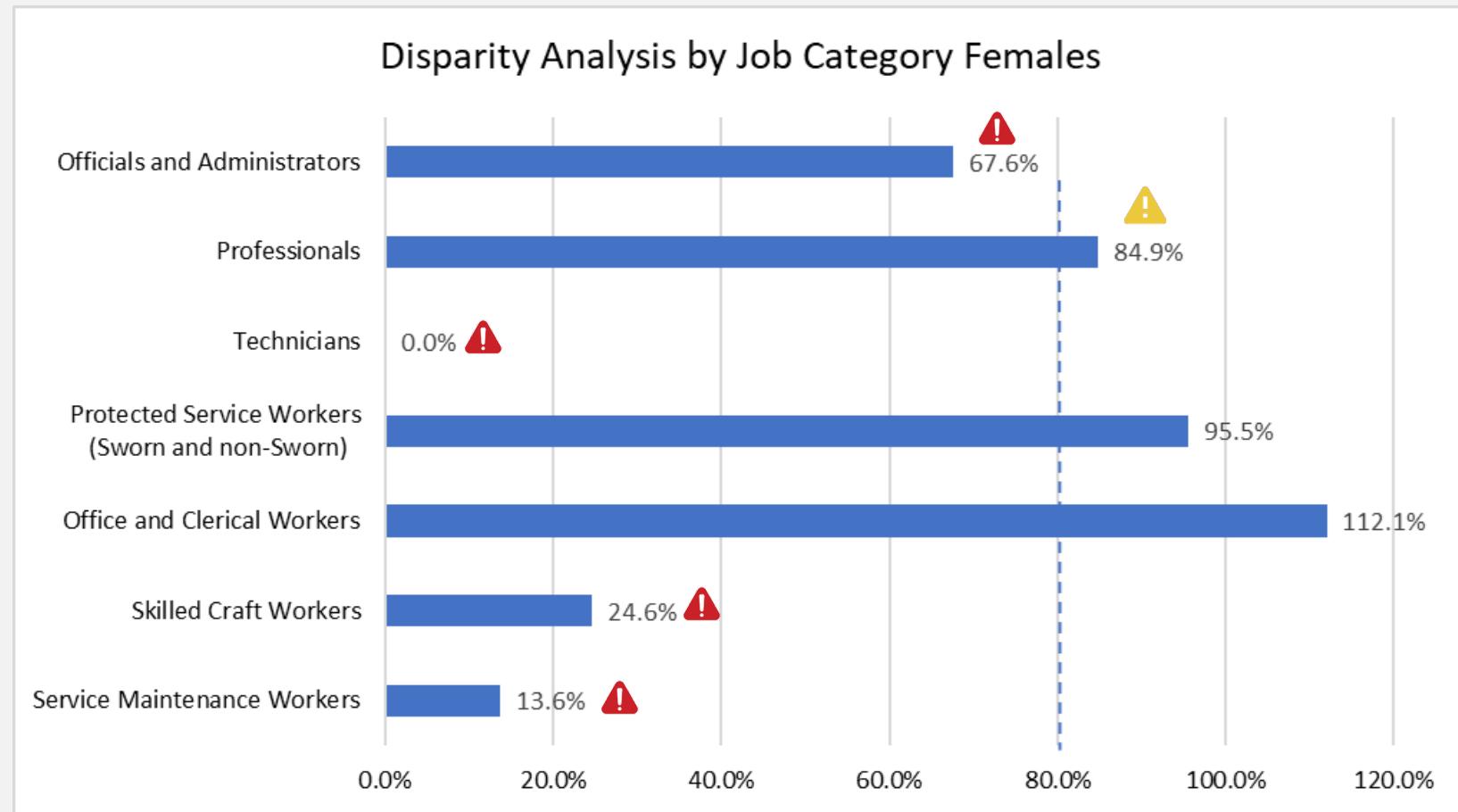


# Employment Disparity Analysis (cont.)

Women were 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 marginally close to being significantly underrepresented for the Professional job category.

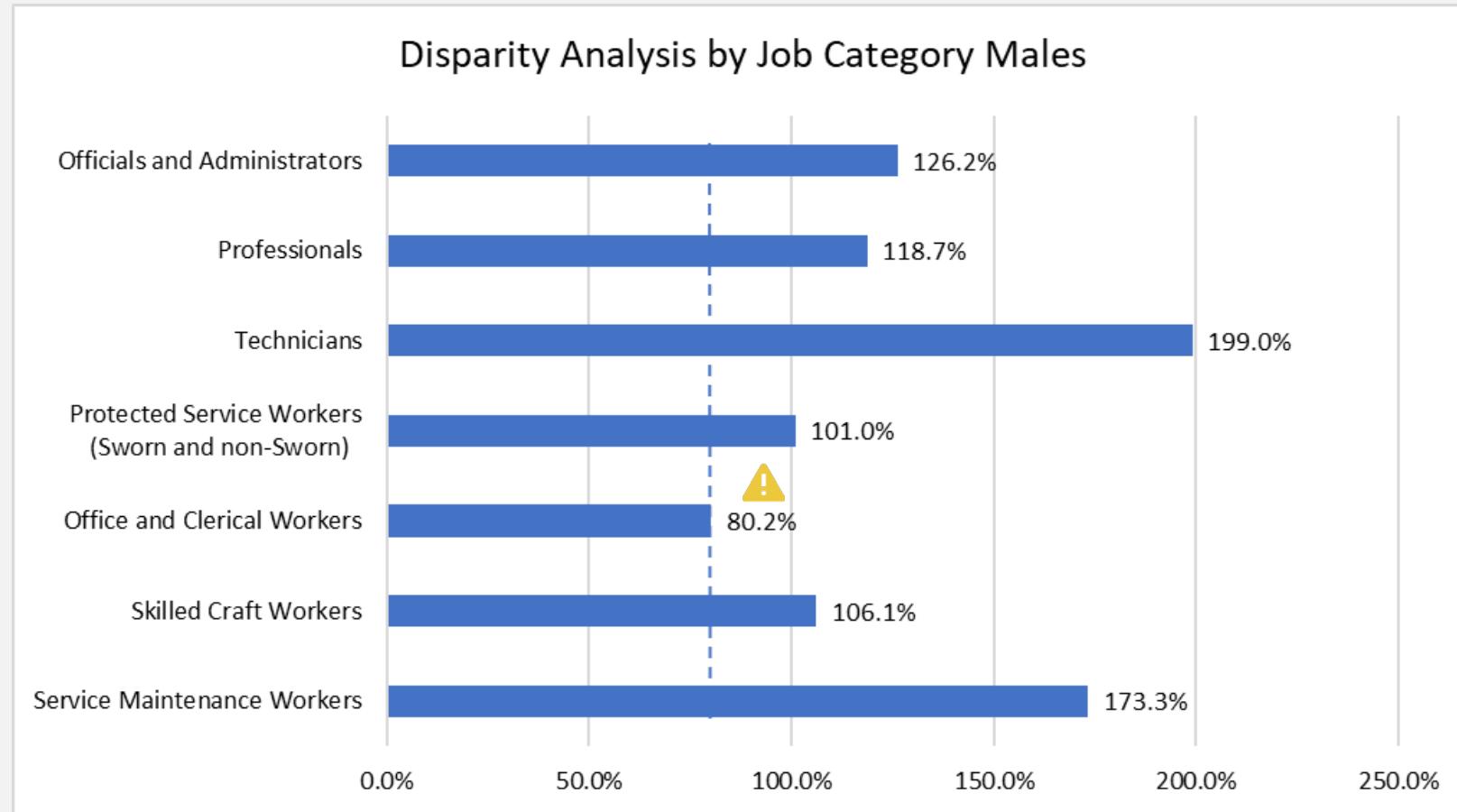
Data is composite of EEOC job group categories table (EEOALL6R)  
Officials/Administrators, Professionals, Technicians, Protective service: Sworn and Non-sworn, Administrative support, Skilled Craft, Service/Maintenance within the following Massachusetts counties; Suffolk, Middlesex, Essex, Norfolk,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



# Employment Disparity Analysis (cont.)

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.

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 counties. Source 2018 Most Recent Census American Community Survey 5-Year Estimates Equal Employment Opportunity.



# Purchasing and Procurement Disparity Analysis

The Town does not collect demographic data for vendors and contractors, and REG was unable to conduct a disparity analysis to determine if there is equal opportunity to do business with the Town.

REG identified the availability of minority and women firms in the Town's relevant market area using data from 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	-

\*Minority and gender firm availability estimates, Small Business Administration and Massachusetts Census data 2023, Supplier Disparity Study Town of Boston 2020).

## Boards and Committees Disparity Analysis

The Town is not currently collecting demographic data for volunteers. Due to lack of available data, REG could not conduct a disparity analysis to determine if there is equal opportunity to serve on the Town's boards and committees.

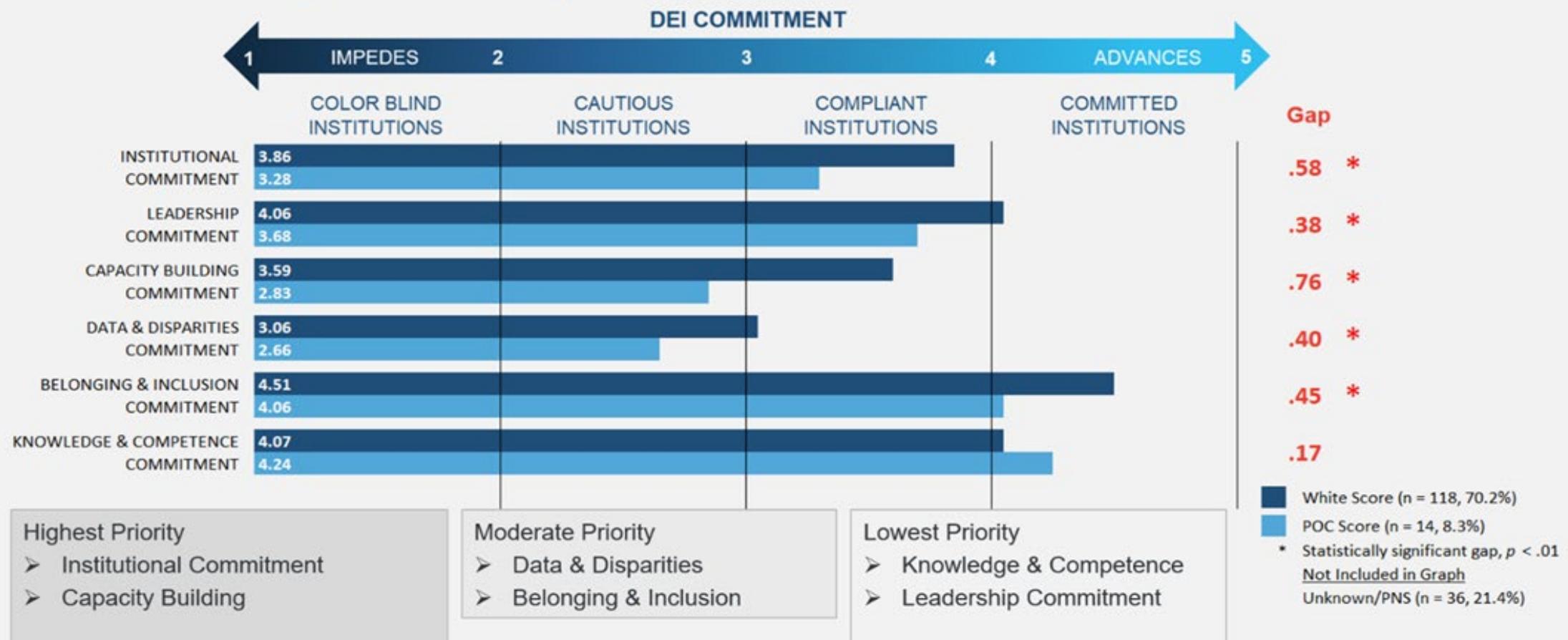
Racial/Ethnic Group	Town Board and Committee Representation	Town Population Demographics Census 2020
Hispanic or Latino	Undetermined	6%
White, non-Hispanic or Latino	Undetermined	71.7%
Black or African American	Undetermined	2%
Asian American	Undetermined	14%
Two or more races or other	Undetermined	9%

# Highlights: DEI Staff Survey

In June 2024, 500 Town government staff members (non-school staff) were invited to complete the DEI online survey. The Town obtained a valid response rate of 88%, consisting of 168 staff responses retained out of 191 received.

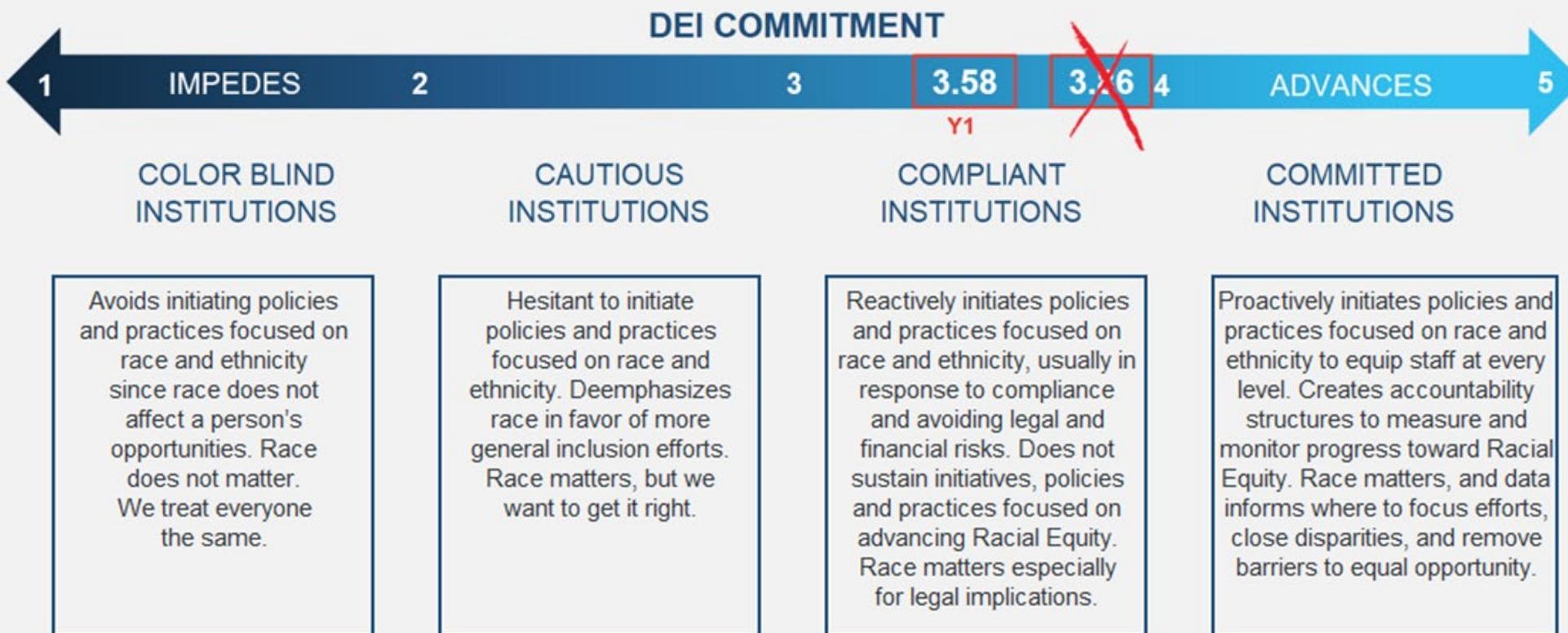
The purpose of the survey was to establish a baseline measure of Town government's commitment to DEI and staff's perception of that commitment.

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



## Highlights: DEI Staff Survey cont.

Staff ratings on Town government's commitment to DEI resulted in a baseline score of 3.58, which includes racial consensus of staff.



## Highlights: DEI Staff Survey cont.

Below are additional questions asked to staff and not included in the DEI commitment score. The optional questions included a response scale of "Never (1), Rarely (2), Sometimes (3), and Often (4)."

- 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.

# Highlights: Community-wide Stakeholder Survey

REG collected feedback from a Town-wide community survey in July 2024. Utilizing a convenience sample (non-representative), REG created a brochure that was inserted into 5,852 residential and commercial utility bills. Paper copies were also made available at Town center and Wellesley Free Library locations.

The Town received 968 individual responses to 28 statements related to access, quality, and treatment regarding Town government opportunities, services and programs, and belonging and inclusion.

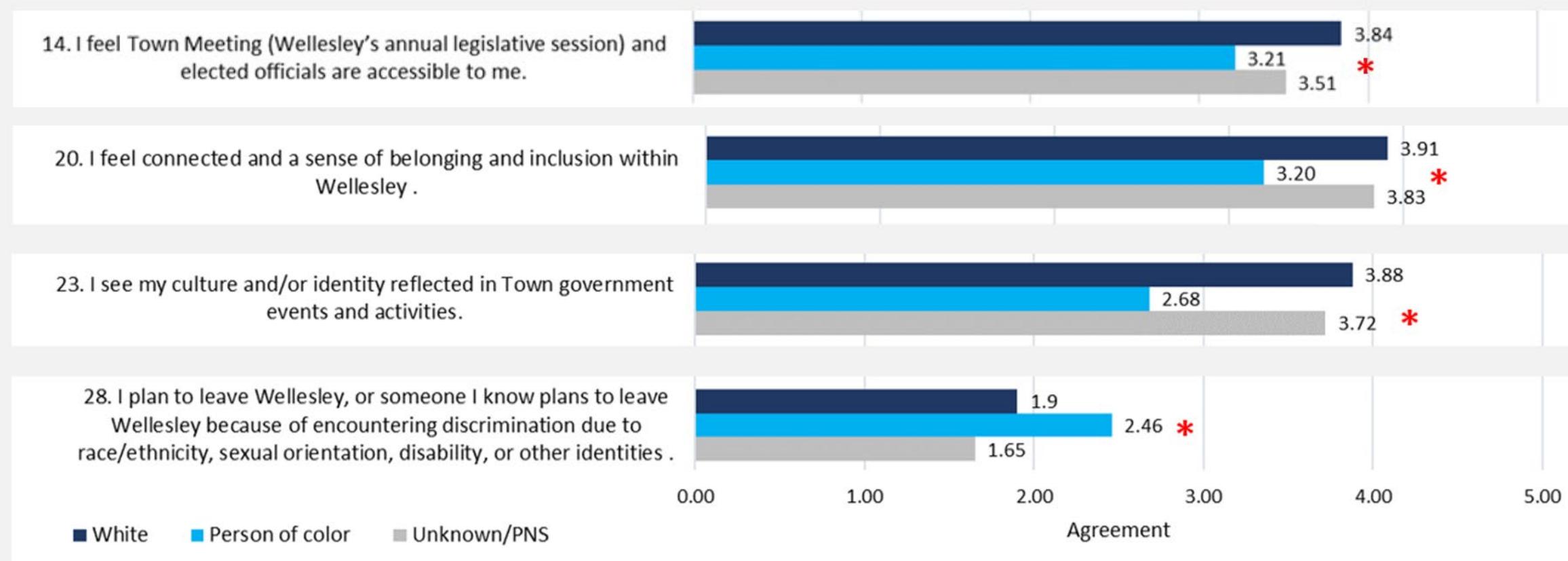
Race/Ethnicity	N	Percent
Asian or Asian American	51	5.3%
Black or African American	24	2.5%
Hispanic or Latinx (non-white)	18	1.8%
Native Hawaiian/Pacific Islander	1	0.1%
White	461	47.6%
Multiracial	14	1.4%
Other	17	1.8%
Unknown/PNS	382	39.5%

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



# Highlights: Community-wide Stakeholder Survey

There were four statements that represented the highest level of statistically significant differences between White and POC respondents:



⚠ In 2022-2024, 17 housing discrimination charges filed with State Attorney General's office, and 47 charges of discrimination filed with the Massachusetts Commission Against Discrimination related to employment, housing and public accommodations. 22 of those charges were filed for employment discrimination. Two complainants filed charges against Town government and the Wellesley Housing Authority. In addition, 21 of the total charges were related to housing, and of those, 20 were against local property managers and landlords operating in Wellesley.

For perspective, in 2023, there were 1458 employment discrimination charges filed with the EEOC for the entire state of Massachusetts.

Evidenced-based Best Practices		Wellesley 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 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 started, awaiting approval or decision
- Establishing:** practice partially in place or process for implementation has started
- Reinforcing:** practice currently present and active

# Diversity, Equity and Inclusion Best Practices Gap Analysis

# Recommended Strategic Objectives

To help address the overall findings, REG recommends prioritizing the following three strategic objectives, and we encourage [the Select Board to sustain the DEI Taskforce/Committee to continuing providing oversight and sustainability](#):

- **1.0 Attract and Retain Diverse Talent**
  - 1.1 Develop a Targeted Recruitment Strategy to Attract Diverse Talent
  - 1.2 Equip Leadership for Creating Fair and Inclusive Workplace Environments
  - 1.3 Evaluate Job Descriptions and Enhance the Interview Process
  - 1.4 Collect Demographic Data for Board and Committee Members
- **2.0 Measure and Monitor Equity for Vendors and Contractors**
  - 2.1 Collect Demographic Data on Vendors and Contractors
  - 2.2 Develop a Targeted Recruitment Strategy to Attract Diverse Vendors and Contractors
- **3.0 Enhance Belonging and Inclusion for all Residents and Stakeholders**
  - 3.1 Support Diverse Cultural Events and Activities
  - 3.2 Enhance Complaint and Discrimination Communication Channels
  - 3.3 Attract Diverse Businesses and Promote Diverse Talent
  - 3.4 Enhance Accessibility to Town Meeting and Elected Officials

# **Appendix**

# **Strategic Action Plan and Scorecard**

STRATEGIC PRIORITIES	Q2 2025	Q3 - Q4 2025	Q1 - Q2 2026	Q3 - Q4 2026
<b>1. Attract and Retain Diverse Talent</b> <ul style="list-style-type: none"><li>○ 1.1 Develop Targeted Recruitment Strategy to Attract Diverse Talent</li><li>○ 1.2 Equip Leadership for Creating Fair and Inclusive Workplace.</li><li>○ 1.3 Evaluate Job Descriptions and Enhance the Interview Process.</li><li>○ 1.4 Collect Demographic Data for Board and Committee Members.</li></ul>	<ul style="list-style-type: none"> <li>• Identify potential upcoming job vacancies for 2025.</li> <li>• Work collaboratively with labor unions to close employment inequities.</li> <li>• Survey board and committee members to identify baseline representation data.</li> <li>• Include additional equal opportunity commitment language on job postings.</li> </ul>	<ul style="list-style-type: none"> <li>• Provide mandatory training for all department leaders, managers and supervisors to create fair and inclusive workplace environments.</li> <li>• Invest in an applicant demographic tracking platform to measure performance of the Town's recruitment strategy.</li> <li>• Create a candidate scoring rubric and a pass score for hiring and promotions.</li> </ul>	<ul style="list-style-type: none"> <li>• Explore partnerships with the School Committee, METCO and MassHire to develop a Town internship program.</li> <li>• Create an exit interview process to monitor talent retention.</li> <li>• Incorporate fair and inclusive workplace goals into manager and supervisor performance reviews.</li> </ul>	<ul style="list-style-type: none"> <li>• Implement a process to review all job descriptions to validate criteria and qualifications, prevent biases and barriers for attracting talent.</li> <li>• Conduct an employee survey to measure workplace climate.</li> </ul>
<b>2. Measure and Monitor Equity for Vendors and Contractors</b> <ul style="list-style-type: none"><li>○ 2.1 Collect Demographic Data on Vendors and Contractors.</li><li>○ 2.2 Develop a Targeted Recruitment Strategy to Attract Diverse Vendors and Contractors.</li></ul>	<ul style="list-style-type: none"> <li>• Survey vendors and contractors to identify baseline representation data.</li> <li>• Conduct disparity analysis for representation of vendors.</li> </ul>	<ul style="list-style-type: none"> <li>• Identify upcoming capital spending, purchasing and procurement opportunities, and notify diverse suppliers using the minority business enterprise directory.</li> </ul>	<ul style="list-style-type: none"> <li>• Enact a capital spending, purchasing and procurement policy to target equitable utilization of MBEs.</li> </ul>	<ul style="list-style-type: none"> <li>• Explore partnerships with the state supplier diversity office (SDO) and BECMA.</li> <li>• Host a joint diverse and small business opportunity fair with neighboring Town/City.</li> </ul>
<b>3. Enhance Belonging and Inclusion for all Residents and Stakeholders</b> <ul style="list-style-type: none"><li>○ 3.1 Support Diverse Cultural Events and Activities</li><li>○ 3.2 Enhance Complaint and Discrimination Communication Channels.</li><li>○ 3.3 Attract Diverse Businesses and Promote Diverse Talent</li><li>○ 3.4 Enhance Accessibility to Town Meeting and Elected Officials</li></ul>	<ul style="list-style-type: none"> <li>• Work with appropriate Town committee to evaluate previous Town events/activities, and acknowledgement of diverse cultures/holidays, to identify opportunities to enhance belonging and inclusion for all stakeholders.</li> <li>• Explore incentive and grant funding to attract underrepresented businesses.</li> </ul>	<ul style="list-style-type: none"> <li>• Explore free transportation and childcare for attending town meeting.</li> <li>• Identify diverse community organizations and individuals from underrepresented groups to gain feedback on diverse cultural programming opportunities.</li> <li>• Consider recognizing/awarding local businesses, and landlords that demonstrate commitment to equal opportunity and fair housing (e.g. disclosing EEO-1 workforce report).</li> </ul>	<ul style="list-style-type: none"> <li>• Remove barriers and provide support for diverse cultural events/activities that benefit the Town.</li> <li>• Educate residents on town meeting, precincts and warrant articles using multimedia.</li> <li>• Increase accessibility to engage town meeting members. Add town meeting members email addresses to existing directory.</li> </ul>	<ul style="list-style-type: none"> <li>• Provide a visible webpage for stakeholders to report bias, discrimination and track complaints.</li> <li>• Explore strategies and partnerships with Wellesley schools, colleges and MassHire to promote diverse talent available to staff local businesses.</li> </ul>

Strategy	Objective	Key Tactics	Goals	Timeline	Status	Key Metrics	Owner(s)
Qualitative statement defines desired direction and area of focus	Key action item that supports implementation of a strategic focus	Combination of specific actions to achieve goals	Quantitative (measurable) or qualitative (observable) metric stating how much will be achieved	By when goal will be complete	Current level of progress for the goal	Quantitative (measurable) or qualitative (observable) data	Person or group responsible for ensuring goals completion
1.0 Attract and Retain Diverse Talent	1.1 Develop Targeted Recruitment Strategy to Attract Diverse Talent.	<ul style="list-style-type: none"><li>Identify potential upcoming job vacancies for 2025.</li><li>Include additional equal opportunity commitment language on job postings.</li><li>Explore partnerships with METCO and MassHire to develop an internship program</li><li>Invest in an applicant demographic tracking platform to measure recruitment strategy</li><li>Work collaboratively with labor unions to close employment inequities.</li></ul>	Create list of potential job vacancies FY 2025  Establish two external partnerships  Obtain an Applicant Tracking System	Q2 2025  Q4 2025  Q3 2025  Q1-Q3 2026	Not Started	# of job vacancies in 2025  # of external partnerships	Human Resources  Select Board Office
	1.2 Equip Leadership for Creating Fair and Inclusive Workplace Environments.	<ul style="list-style-type: none"><li>Provide mandatory training for managers and supervisors to create fair and inclusive workplace environments.</li><li>Create an exit interview process to monitor talent retention.</li><li>Incorporate fair and inclusive workplace goals into manager and supervisor performance reviews.</li><li>Conduct employee survey to measure workplace climate.</li></ul>	Provide quarterly training for all managers  Enact an exit interview policy  Design workplace climate survey	Q3 2025  Q4 2025  Q1 2026  Q1-Q3 2026		% department managers trained  % of employees agree fair and inclusive workplace	Human Resources  Select Board Office
	1.3 Evaluate Job Descriptions and Enhance the Interview Process.	<ul style="list-style-type: none"><li>Implement a process to review all job descriptions to validate criteria and qualifications, prevent biases and barriers for attracting talent.</li><li>Create a candidate scoring rubric and a pass score for hiring and promotions.</li></ul>	Develop a job descriptions review plan  Design scoring rubric template	Q1 2026  Q3 2025  Q1-Q3 2026	Complete	% job descriptions evaluated	Human Resources  Select Board Office
	1.4 Collect Demographic Data for Board and Committee Members	<ul style="list-style-type: none"><li>Survey board and committee members to identify baseline representation</li></ul>	Create a volunteer demographic survey	Q2 2025			Select Board Office

Strategy	Objective	Key Tactics	Goals	Timeline	Status	Key Metrics	Owner(s)
Qualitative statement defines desired direction and area of focus	Key action item that supports implementation of a strategic focus	Combination of specific actions to achieve goals	Quantitative (measurable) or qualitative (observable) metric stating how much will be achieved	By when goal will be complete	Current level of progress for the goal	Quantitative (measurable) or qualitative (observable) data	Person or group responsible for ensuring goals completion
2.0 Measure and Monitor Equity for Vendors and Contractors	2.1 Collect Demographic Data on Vendors and Contractors.	<ul style="list-style-type: none"><li>Survey vendors and contractors to identify baseline representation data.</li><li>Conduct a disparity analysis for representation of suppliers.</li><li>Include additional equal opportunity commitment language on all bid postings.</li></ul>	Create a Vendor survey  Develop a disparity analysis report  Add DEI language to all job postings	Q2 2025  Q3-Q4 2025	Not Started	% of vendors surveyed  % vendor representation by race/ethnicity and gender  % of job posting with new DEI language	Finance Dept.  Select Board Office
	2.2 Develop a Targeted Recruitment Strategy to Attract Diverse Vendors and Contractors.	<ul style="list-style-type: none"><li>Identify upcoming capital spending, purchasing and procurement opportunities, and notify diverse suppliers using the minority business enterprise directory.</li><li>Enact a capital spending, purchasing and procurement policy to target equitable utilization of MBEs.</li><li>Explore partnerships with the state supplier diversity office (SDO) and BECMA.</li><li>Host a joint diverse and small business opportunity fair with neighboring Town/Town.</li></ul>	List of upcoming procurement opportunities for 2025  Enact an MWBE Procurement Policy  Host 2 vendor fairs	Q3 2025  Q4 2025  Q1 2026	Not started	% of vendor fair attendees MBEs  % capital spending, purchasing and procurement with MWBE participation	Select Board Office  Finance Dept.

Strategy	Objective	Key Tactics	Goals	Timeline	Status	Key Metrics	Owner(s)
Qualitative statement defines desired direction and area of focus	Key action item supporting implementation of a strategic focus	Combination of specific actions to achieve goals	Quantitative (measurable) or qualitative (observable) metric stating how much will be achieved	By when goal will be complete	Current level of progress for the goal	Quantitative (measurable) or qualitative (observable) data	Person or group responsible for goals completion
3.0 Enhance Belonging and Inclusion for all Residents and Stakeholders	3.1 Support Diverse Cultural Events and Activities.	<ul style="list-style-type: none"> <li>Work with the appropriate Town committee to evaluate previous Town events/activities, and acknowledgement of diverse cultures/holidays, to identify opportunities to enhance a sense of belonging and inclusion for all stakeholders.</li> <li>Identify diverse community organizations and individuals from underrepresented groups to gain input and feedback on potential diverse cultural programming opportunities.</li> <li>Remove barriers and provide support for diverse cultural events/activities that benefit the Town.</li> </ul>	Identify total # diverse events in Town Identify 3 external community partnerships List of barriers to diverse events identified	Q2 2025 Q3 2025 Q1 2026	Not Started	# of potential diverse events for 2025 # of barriers removed	Select Board Office Celebrations Committee Cultural Council
	3.2 Enhance Complaint and Discrimination Communication Channels.	<ul style="list-style-type: none"> <li>Provide a visible webpage for stakeholders to communicate bias and discrimination and track complaints.</li> </ul>	Webpage collecting discrimination and bias complaints	Q4 2025	In progress	% discrimination and bias complaints by category	Select Board Office Freedom Team
	3.3 Attract Diverse Businesses and Promote Diverse Talent.	<ul style="list-style-type: none"> <li>Explore partnerships with Wellesley schools, colleges, MassHire, Charles River Chamber, Linden Square Retailers Assoc. and Wellesley Square Merchants Assoc. to promote diverse talent to staff local businesses.</li> <li>Explore incentive and grant funding to attract underrepresented businesses.</li> <li>Consider recognizing/awarding local businesses that demonstrate commitment to equal opportunity and DEI (e.g. disclosing EEO-1 workforce demographics report).</li> </ul>	Formal partnerships and commitments established	Q1 2026	Complete	# of external partnerships % demographic representation of interns/hires	Planning Board Select Board Office
	3.4 Enhance Accessibility to Town Meeting and Elected Officials.	<ul style="list-style-type: none"> <li>Educate residents on town meeting, precincts and warrant articles using multimedia.</li> <li>Increase accessibility to engage town meeting members. Add town meeting members email addresses to existing directory.</li> <li>Explore free transportation and childcare for town meeting.</li> </ul>	Develop and administer board and committee survey	Q3 2025 Q4 2025	Not started	# of barriers removed to town meeting accessibility	Select Board Office

# **Policy Recommendations**

**(policies may be modified as appropriate)**

# **Policy Recommendations to Expand Equal Employment Opportunity**

POLICY NAME	POLICY ACTION	INTENDED OUTCOME
<b>(1.1) Removing Barriers and Bias From Job descriptions.</b>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• Avoids unnecessary barriers that are not a valid business necessity to perform the job, and bias that may unintentionally exclude talent.</li> </ul>
<b>(1.1) Job Postings that Promote Equal Opportunity:</b>	<ul style="list-style-type: none"> <li>• 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></li> </ul>	<ul style="list-style-type: none"> <li>• Encourages and promotes equal opportunity. Generates an applicant pool reflective of the qualified available labor pool, in the Town's reasonable recruitment area.</li> </ul>
<b>(1.1) Reasonable Recruitment Time Frames:</b>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• Avoids hiring too fast just to fill the vacant position. Generates a more competitive pool of qualified candidates to select from.</li> </ul>

POLICY NAME	POLICY ACTION	INTENDED OUTCOME
<b>(1.1) Utilizing Staffing Agencies and Recruitment Firms:</b>	<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>Maximizes return on investment of taxpayer dollars for purchasing recruitment services.</li> </ul>
<b>(1.3) Standardizing Applicant Screening Criteria:</b>	<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>Minimizes selection bias and establishes an objective evaluation of all candidates based on the necessary job competencies.</li> </ul>
<b>(1.1) Equal Opportunity Candidate Pools:</b>	<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>Generates a more competitive pool of qualified candidates to select from, based on the validated benchmark of the available labor pool.</li> </ul>

POLICY NAME	POLICY ACTION	INTENDED OUTCOME
<b>(1.3) Interviewing, Hiring and Promotions Scoring Rubric</b>	<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>Evaluates candidates on objective measures rather than subjective.</li> <li>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.</li> </ul>
<b>(1.2) Exit Interviews:</b>	<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>Measures and monitors talent retention with quantitative and qualitative data.</li> <li>Provides insights into organizational culture and impacts to employee engagement and productivity.</li> <li>Identifies trends or challenges that may affect talent retention</li> </ul>

# **Policy Recommendations to Expand Equal Procurement Opportunity**

POLICY NAME	POLICY ACTION	INTENDED OUTCOME
<b>(2.2) Forecasting bids and solicitation:</b>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• Provides sufficient time for smaller firms to prepare responses to solicitations.</li> </ul>
<b>(2.2) Bid/Solicitation Assistance:</b>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• Facilitates networking opportunities between prime and subcontractors. And provides equal access to procurement staff.</li> </ul>
<b>(2.2) Bid/Solicitation Postings:</b>	<ul style="list-style-type: none"> <li>• 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></li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>
<b>(2.2) Monitor Contractor Commitment:</b>	<ul style="list-style-type: none"> <li>• 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 plan 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 demonstrate good faith efforts, and 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.</li> </ul>	<ul style="list-style-type: none"> <li>• Deters false claims of stated commitments to work with MWBEs and the actual outcomes of utilizing MWBEs.</li> <li>• Expands equal opportunity to do business with the Town.</li> </ul>

POLICY NAME	POLICY ACTION	INTENDED OUTCOME
<b>(2.1) Collecting Vendor MWBE Status:</b>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• Obtains data for measuring and monitoring equal opportunity to do business with the Town.</li> </ul>
<b>(2.2) MWBE Utilization Plan:</b>	<ul style="list-style-type: none"> <li>• 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"> <li>• 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.</li> <li>• A plan detailing the efforts to be made by the proposer during the term of the proposed contract with the Town 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.</li> </ul> </li> <li>• 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 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. The Town reserves the right to designate contractor as ineligible for future Town bid awards.</li> </ul>	<ul style="list-style-type: none"> <li>• Promotes equal opportunity to participate in all Town funded contracts.</li> <li>• Builds capacity for increasing competition for awarding contracts by the Town.</li> <li>• Prevents vendors with a dominant market position from using their power to unfairly gain Town contracts.</li> </ul>

Goods and Services (Ch. 30B)	Building Construction (Ch. 149, 44A-44J/ Ch. 30B)	Public Works (Ch. 30, Sec. 39M)	Design Services (Ch. 7C)
<p><b>Less than \$10,000:</b> 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><b>\$10,000–\$50,000:</b> Solicit and obtain written quotes from a least three bidders. <i>Demonstrate good faith efforts to obtain quotes from MWBEs.</i></p>	<p><b>Less than \$10,000:</b> 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><b>\$10,000–\$50,000:</b> Solicit and obtain written quotes from a least three bidders. <i>Demonstrate good faith efforts to obtain quotes from MWBEs.</i></p>	<p><b>Less than \$10,000:</b> 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><b>Estimated Design Fee less than \$30,000 or Estimated Cost Construction less than \$300,000:</b> Solicit and obtain written quotes from a least three bidders. <i>Demonstrate good faith efforts to obtain quotes from MWBEs.</i></p>
<p><b>Over \$50,000:</b> 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><b>\$50,000–\$150,000:</b> 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><b>\$10,000–\$50,000:</b> Solicit and obtain written quotes from a least three bidders. <i>Demonstrate good faith efforts to obtain quotes from MWBEs.</i></p>	<p><b>Estimated Design Fee \$30,000 or more and Estimated Cost Construction \$300,000 or more:</b></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>
<p><b>Over \$50,000:</b> 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><b>Over \$150,000:</b> 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><b>Over \$50,000:</b> 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>	

# **Policy Recommendations to Expand Equal Volunteer Opportunity (Boards and Committees)**

POLICY NAME	POLICY ACTION	INTENDED OUTCOME
<b>(1.4) Benchmarking Representation</b>	<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> <li>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.</li> </ul>
<b>(3.0) Volunteer Training and Expectations:</b>	<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>Informs and equips board and committee volunteers with the necessary knowledge that for effective decision-making on Town policies, practices, budgets and programs.</li> <li>Provides insights into the needs of all residents and stakeholders. and understanding to shape belonging and inclusion for the entire town.</li> </ul>



# Racial Equity Group

MAKING RACIAL EQUITY STANDARD OPERATING PROCEDURE

# Contact us

Racial Equity Group is a management consulting firm that provides advisory services to public and private sector organizations on Racial Equity, and inclusion strategies, as well as customizing and facilitating Racial Equity audits and training experiences.



## Email

[info@racialequitygroup.com](mailto:info@racialequitygroup.com)



## Phone

+1 888.369.1339



## Website

[www.racialequitygroup.com](http://www.racialequitygroup.com)



## Address

391 Las Colinas Blvd. Ste 130-350  
Irving, Texas 75039