



The City of New York
Department of Investigation

MARK G. PETERS
COMMISSIONER

80 MAIDEN LANE
NEW YORK, NY 10038
212-825-5900

DEPARTMENT OF INVESTIGATION

DIVERSITY AND EQUAL EMPLOYMENT OPPORTUNITY PLAN FISCAL YEAR 2016

I. Introductory and Commitment Statement by the Agency Head:

The New York City Department of Investigation ("DOI") is committed to a diverse and inclusive workforce and increased opportunities for all employees. DOI is an equal opportunity employer and prohibits discriminatory employment actions against, and treatment of, City employees and applicants for employment based on actual or perceived race, color, national origin, alienage, citizenship status, religion or creed, gender (including "gender identity" -- which refers to a person's actual or perceived sex, and includes self-image, appearance, behavior or expression, whether or not different from that traditionally associated with the legal sex assigned to the person at birth), disability, age (18 and over), military status, prior record of arrest or conviction (in accordance with state and local law), marital status, partnership status, genetic information or predisposing genetic characteristic, sexual orientation, status as a victim or witness of domestic violence, sex offenses or stalking and unemployment status.

DOI employees have a responsibility to be respectful of all our co-workers and members of the public. Recognizing that the people of our agency are one of our greatest assets, we are committed to recruitment, development, and retention of a diverse and inclusive workforce reflective of our City's population. We expect all managers and supervisors to promote a work environment that values equity, inclusion, and respect for all.

Attached you will find a list of the agency's EEO Officer, EEO Counselors, the Disability Rights Coordinator, and the Career Counselor which is also posted on the agency's intranet. In addition, attached is a copy of the EEO Policy. Our EEO staff is available to provide input on personnel matters in addressing EEO and diversity issues, and to investigate EEO complaints. They are working closely with DCAS's Division of Citywide Equal Employment Opportunity Division.

For any assistance or information on these or other EEO issues, you should contact Tracy Wright, EEO Officer or any other member of the EEO staff; Shayvonne Nathaniel, Disability Rights Coordinator and 55-a Coordinator/Career Counselor.

II. Recognition and Accomplishments:

On August 7, 2015, DOI held its 5th annual Employee Appreciation Picnic and Softball Tournament. The half-day event included food, games, and opportunities for employees to interact with other DOI employees, as well as senior management.

The Commissioner meets with each unit for monthly appreciation breakfasts to recognize accomplishments and create an open forum for discussion. During the breakfast, the Commissioner acknowledges the contributions of each unit and its corresponding employees. Moreover, the Commissioner presents challenge coins to employees who have demonstrated excellence in the furtherance of the agency's mission.

III. Accountability Statement:

DOI maintains a copy of the City's EEO Policy on its intranet, which is accessible by all DOI employees, including interns and temporary workers. Moreover, in January 2016, DOI employees participated in computer based EEO training.

In August 2015, the Commissioner issued a Diversity and Inclusion Commitment Statement via email to affirm the principles of diversity, inclusion, and equal employment opportunity. The memorandum encouraged managers and supervisors to value and foster fairness, equity, respect and promote diversity through DOI at all levels. The managers were reminded to continue to work with the EEO staff and Human Resources Unit to integrate equal opportunity principles and practices into personnel decisions, including hiring, promotions, evaluations and transfers.

The EEO Officer and staff will implement the objectives and actions of this plan, as well as work to create a diversity and inclusion strategy, which is separate from the agency's strategic plan, based upon guidance provided by DCAS Citywide Diversity and EEO. We will continue discussions throughout the year coinciding with the issuance of our quarterly workforce reports and will take steps to review the goals we achieved at the end of the year. The EEO Officer will serve as a resource for agency managers and supervisors by providing us with best practices and providing direction in addressing any identified EEO issues.

IV. Proactive Strategies to Enhance Diversity, EEO and Inclusion

Insert three primary goals of your strategy for FY 2016 focused on enhancing diversity, equal employment opportunity, and the overall value of inclusion at your agency.

1. Continue to conduct diversity recruiting, and in particular, target minority professional organizations in order to increase the pool of qualified, diverse candidates. We will also

continue to maintain regular contact with a variety of minority professional associations for diverse applicants with wide-ranging experiences, including applicants to replace retiring employees.

2. Provide management and professional trainings to DOI staff to enhance equal opportunity in career advancement. DOI has dedicated an Associate Commissioner to coordinate all agency trainings. The Associate Commissioner will also provide skill development opportunities and mentoring for current employees in order to foster succession planning.
3. Identify best practices for establishing a brand of inclusive customer services.

V. Recruitment

A. Recruitment Efforts

1. Summary of Recruitment Efforts – Include steps that will be taken to give notice to all employees of discretionary job postings within the agency as well as proactive efforts/strategies planned to market positions externally.

1. Post all positions internally and notify employees of open positions.
2. Post positions on City's public website.
3. Participate in job fairs and provide postings to minority organizations and other diverse populations. We also employ high school and college students as interns in order to gain a greater understanding of the agency and to promote future employment.

Diverse Recruitment Source(s)	What sort of return do you expect to see from the effort?
1. Cityjobs	1. We are hopeful that our efforts will allow us to reach a larger diverse population and thereby result in an increasingly diverse workforce.
2. College and Universities	2. Same as above

3. Mayor's Office for People with Disabilities	3. Same as above
4. Minority organizations and associations	4. Same as above
5. Specialized Disciplines	5. Same as above
6. LinkedIn	6. Same as above

2. Indicate the type of internship opportunities available at your agency. Please provide the number of student interns employed in FY 2015 and their demographic profiles. Indicate your plans to provide internship opportunities in FY 2016.

DOI currently provides investigative and legal internships. In FY 2015, there were a total of 34 DOI interns: 21 female, 13 male, 9 African American, 6 Asian, 5 Hispanic, and 14 White.

DOI maintains a small number of interns throughout the year. We will continue our summer internship program for investigative and legal positions, and seek to recruit a diverse, qualified group.

B. 55-a Program

1. Please discuss plans to utilize the 55-a Program to hire and retain qualified individuals with disabilities. Indicate the goals of your 55-a program coordinator for FY 2016. Include also your agency plans to do the following: participate in career and job fairs; use internship, work-study, co-op, and other programs to attract a pool of diverse 55-a program applicants; and promote and encourage 55-a program participants to take civil service examinations.

In past years, DOI has participated in the Disability Mentoring Day sponsored by the Mayor's Office for People with Disabilities ("MOPD"). We will continue to participate in career fairs and expand our outreach to organizations that serve the disabled population.

Our 55-a Coordinator's goals are to create a greater awareness of the 55-a program through continued communications on the DOI intranet and agency bulletin boards; inform job seekers at job fairs of the 55-a Program; and remind appropriate recruiters of the availability of the 55-a program.

VI. Selection (Hiring and Promotion)

Please answer the following questions:

1. For FY 2016, if your agency is fiscally able to hire new employees and/or backfill open positions, please discuss the planned duties for your career counselor specific to advising employees of opportunities for promotion as well as overall career development.

The DOI Career Counselor will advise employees of current and anticipated promotional opportunities in an employee's stated area of interest. The career counselor will work with employees to develop long term career objectives and attempt to correlate employee's interests amongst the various work units within DOI. The career counselor will advise employees of the preferred skill sets associated with different specializations and assist with the development of a plan to improve and expand on an employee's skill set.

Employees will be informed of civil service exam requirements associated with preferred line of work and will be encouraged to utilize the NYC.GOV website to keep abreast of career and training opportunities. DOI will continue to provide and fund training opportunities for employees who seek career advancement.

Further, DOI's Career Counselor will encourage employees to communicate with their supervisors to attain periodic feedback on job performance and to develop a plan to improve upon overall performance.

2. What are your current new hire and promotional procedures for selection, especially for mid- and high-level discretionary positions?

DOI posts open job positions, including mid- and high-level positions, on nyc.gov as well as City & State publication. As part of outreach, the EEO Officer and human resources personnel contact members of minority professional organizations to inform them of open positions and to solicit a diverse, qualified applicant pool. In addition, DOI often contacts the Mayor's Office of Appointments to help identify talented candidates and, when necessary, for additional networks to find qualified candidates.

The DOI Human Resources Unit publicly posts job announcements for senior staff positions. The unit and the applicable manager review resumes to ensure candidates meet the job qualifications. DOI Executive Staff conducts interviews, and questioning is designed to assess the candidate's substantive knowledge, management skills and other relevant skills. The Commissioner subsequently interviews candidates considered for mid- and high level positions. The Commissioner and members of the Senior Executive staff review applications and conduct interviews for high-level positions. In order to expand the applicant pool for open positions, DOI encourages employees to refer friends or colleagues who meet the job requirements.

DOI is mindful of demographics and takes measures to prevent underutilization. Specifically, the agency regularly monitors diversity within senior management and considers diversity when seeking candidates for mid- and high-level positions.

The agency head and senior leadership will continue to monitor recruitment, hiring/selection, promotion, compensation, separation, and demotion, on a quarterly basis. We will promote inclusive agency practices, policies, programs enhancing our progress in establishing a diverse workforce and pipeline across all levels of our agency.

3. For FY 2016, indicate how your agency will review the methods by which candidates are selected for new hiring and promotion. Identify the steps that are taken to ensure that selection process is objective and job related. For instance, have you explored/implemented structured interviewing and/or training, panel interviews, etc.?

DOI reviews the education and work experience of the candidates and the interviewers complete interview questionnaires. The agency currently has a structured panel interviewing procedure. DOI will continue to utilize those procedures.

DOI has participated in Disability Mentoring Day in order to meet and possibly hire qualified individuals with disabilities.

DOI will also continue to provide mentoring to new investigators to aid in their transition and acclimation to the agency, in addition to foster succession planning.

4. What steps will your agency take in FY 2016 to review your positions filled through a civil service list?

- A. Detail planned actions specific to review of title specification, job description, interview procedures, and selection procedures.
- B. Discuss your current protocol for use of the interview log to identify applicants by gender and race/ethnicity.
- C. Discuss all planned steps taken to identify barriers to entry for positions and actions under consideration to address such barriers.
- D. When identifying groups of subject matter experts to assist the DCAS test development team, please describe efforts that will be taken to select a diverse and inclusive group of individuals.

DOI continues to review civil service positions to ensure that the employee's civil service titles are consistent with their job specifications.

In addition, as part of the interview process each panel interviewer completes an interview guide form in which he/she indicates the candidate's gender and race by "observation only." DOI has begun utilization of E-hire as a more comprehensive method to input and track the interview process, which includes self-identification. The EEO Officer has viewing rights in e-hire and will regularly monitor the applicant log and pool for demographic representation.

We continue to review the quarterly CEEDS reports, which help us understand the workforce composition by race/ethnicity and gender. If certain job groups are determined to be underutilized, we

will continue to expand our recruitment efforts to ensure that groups that are underrepresented are made aware of vacancies at the agency.

We will also continue our efforts to select a diverse and inclusive group of individuals and we will continue to monitor the agency's progress meeting its EEO goals. We have and will continue to broaden job outreach efforts to minority and disability related organizations.

5. Briefly detail which stages of selection involve your EEO Officer (pre- and post-selection).

The EEO Officers consults with the Human Resources unit to maintain an updated listing of sources for diverse applicants, including schools and professional associations. We continuously revise and edit our listing based upon participation from the school/organization and candidates yielded due to DOI's outreach. During a review of our quarterly CDEEO data, we examine the demographics for newly hired employees and the way in that data has impacted the overall agency demographics. If there is any underutilization observed, then the agency makes a concerted effort to reach out to organizations and other partners to increase a diverse applicant pool for future hiring. The EEO Officer identifies underutilized demographics for open positions.

The EEO Officer reviews interview questionnaires and applicant logs. Moreover, the EEO Officer actively monitors agency job postings for diverse, qualified applicants.

6. During periods of layoffs, terminations and demotions due to legitimate business/operational reasons, what is your protocol for analyzing the impact of such actions based upon gender, race and age? It is most useful to conduct this analysis prior to finalizing the list of titles that will be impacted.

DOI has not experienced periods of layoffs and does not anticipate doing so. While the agency analyzes the impact of terminations and demotions on DOI's demographics, the analysis does not outweigh the legitimate business/operations reason for such decision. The Commissioner and other members of the senior executive staff are abreast of the most recent demographics, as well as any shifts that should be addressed. The agency will continue to review the diversity impact of its business and operational employment decisions on a case by case basis, in consultation with the DOI General Counsel and the Law Department, if necessary.

VII. Workforce Analysis:

1. Describe steps taken to encourage all employees at your agency to update self-ID information regarding race, ethnicity, gender, disability and veteran status through either NYCAPS Employee Self Service or other means.

The EEO Officer will notify the staff to use NYCAPS Employee Self-Service (ESS) to report and update their self-ID information. The email notification also indicate the purpose and usefulness of such information.

2. For FY 2016, are you planning review of the CEEDS workforce composition, utilization, new hires and promotions reports presented by your EEO Officer in consultation with the Personnel Officer and your General Counsel?

Yes or No

Suggested Guidance: If there is any underutilization, the agency addresses the issue in subsequent employment actions, such as hiring and promotions. DOI actively recruits a diverse pool of candidates through relationships with minority professional organizations, as well as diverse campus groups at local colleges and universities.

VIII. Training:

Please detail planned training for FY 2016 that relates to diversity and inclusion, career development and/or leadership training and interviewing. Please provide a list of dates (where possible) for planned EEO training for new employees during FY 2016 and the timeframe for providing EEO training to newly promoted supervisors/managers using the available computer based training. Additionally, please describe your efforts to conduct EEO training once every two years for your workforce.

Training Topic	Type of Audience (Line, HR, Managers and Supervisors, combination, etc.)	Target Number of Participants	Targeted Dates
1. Diversity and Inclusion CBT	All DOI Staff	500	November 2016
2. EEO Training	New Hires and Staff Members	N/A	Open
3. EEO CBT	All DOI Staff	600	January 2016

IX. Reasonable Accommodation:

Please indicate the actions your agency will take to ensure that the process of reviewing reasonable accommodation requests is compliant with the EEO Policy as well as the applicable federal, state, and local laws. Additionally, please detail any best practices currently implemented in this area. Lastly, please describe your current appeal protocol.

The agency stays abreast of the EEO policy and NYC Human Rights Law and all other applicable rules and regulations regarding reasonable accommodations for disability, religion, victims of domestic violence, sex offense and stalking, pregnancy, childbirth and pregnancy related medical conditions. The EEO staff communicates with the requestor and supervisor to assess the reasonable accommodation request to make a determination whether the accommodation is needed, and if needed, whether the accommodation would be effective, and if effective, whether providing the reasonable accommodation would impose an undue hardship on the agency.

If a requested reasonable accommodation is deemed ineffective and the employee remains unable to perform his/her essential functions, then the agency considers whether there would be an alternative and effective reasonable accommodation that would not pose an undue hardship. The EEO staff ascertains from the supervisor how the employee's situation is impacting the day-to-day function of the

unit. If the reasonable accommodation request is equipment-related and supported by medical documentation and gives the employee the ability to perform his/her required tasks and the agency can afford it, the supervisor must sign and approve the procurement requisition for the purchase of the equipment.

If the reasonable accommodation involves a request for a personnel action, such as leave, modified or part-time schedules, modified workplace, or reassignment, the Americans with Disabilities Act ("ADA") and the Family and Medical Leave Act ("FMLA") is reviewed along with the requirements of the employee's current position, the needs of the agency and the impact on the agency. Where there does not appear to be alternative accommodations or other options available to the agency, the HR Director and a member of the General Counsel's office is consulted, if they have not already been.

After all possibilities have been explored, reviewed and carefully examined by the EEO staff and possibly the supervisor, HR and Budget Director, and a member of the General Counsel's office, the employee receives a written notification of the request denial. Included in that letter is notice to the employee that he/she may file an appeal with the Commissioner.

Within ten (10) business days of the receipt of an appeal, the Commissioner or his designee, First Deputy Commissioner Lesley Brovner, reviews and evaluates the reasonableness of the employee's request, consults with the employee and EEO Officer and other representatives that the Commissioner deems necessary, and/or consults with Office of Citywide EEO or the Law Department. Within 15 business days of the receipt of the appeal, the Commissioner issues a written determination on the request for the reasonable accommodation and, if granted, the EEO Officer monitors implementation of the reasonable accommodation.

X. Audits and Corrective Measures:

The Department of Investigation is not subject to any audit or required to implement any corrective action.

Mark Peters

Print Name of Agency Head

Mark Peters

Signature of Agency Head

1/27/16

Date

DOI's Equal Employment Opportunity Staff

Department of Investigation
Office of Equal Employment Opportunity
80 Maiden Lane, 18th Floor
New York, NY 10038

DOI Equal Employment Opportunity (EEO) Officer

Tracy Wright
80 Maiden Lane, 18th Floor
New York, NY 10038
(212) 825-5473
twright@doi.nyc.gov

DOI Equal Employment Opportunity Counselors

Renee Welker
80 Maiden Lane, 16th Floor
(212) 825-2425
rwelker@doi.nyc.gov

Alan Lefkof, EEO Counselor
80 Maiden Lane, 17th Floor
(212) 825-6810
alefkof@doi.nyc.gov

DOI Disabilities Rights Coordinator/55-a Coordinator/ADA Coordinator and Career Counselor

Shayvonne Nathaniel
80 Maiden Lane, 25th Floor
(212) 825-2484
snathaniel@doi.nyc.gov