

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 2018

Introductory and Commitment Statement by the Agency Head:

The New York City Department of Investigation ("DOI") is committed to creating a diverse and inclusive workforce and providing increased opportunities for all employees. DOI is an equal opportunity employer and, in accordance with the Citywide Equal Employment Opportunity Policy, prohibits discriminatory treatment of, and employment actions against, City employees, contractors, interns, 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, caregiver status, genetic information or predisposing genetic characteristic, sexual orientation, status as a victim or witness of domestic violence, sex offenses or stalking, unemployment status, consumer credit history, and familial 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 the recruitment, development, and retention of a diverse and inclusive workforce reflective of our City's population. When we value our differences, we build stronger teams driving the best performance. 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, Disability Services Coordinator and the Career Counselor which is also posted on the agency's intranet. Also attached is a copy of the EEO Policy, including the October 5, 2017 addendum. Our EEO staff is available to provide input on personnel matters in addressing EEO and diversity issues, and to investigate EEO complaints. Our EEO staff works closely with DCAS's Office of Citywide Diversity and Equal Employment Opportunity.

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

II. Recognition and Accomplishments:

On December 16, 2016, DOI held its Agency Award Ceremony, where employees and units are recognized for their work in furtherance of the agency's mission and we will hold the annual Ceremony once again on December 15, 2017. Additionally, on August 4, 2017, DOI held its 7th 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.

As Commissioner, I meet with the agency's units for appreciation breakfasts to recognize accomplishments and create an open forum for discussion. During the breakfast, employees' contributions to their units are acknowledged.

III. <u>Accountability Statement</u>:

DOI maintains a copy of the City's EEO Policy, the booklet "About EEO: What You May Not Know," and other relevant resources on its intranet, which is accessible by all DOI employees, including interns and temporary workers.

In April 2018, I will issue a Diversity and Inclusion Commitment Statement via email to affirm the principles of diversity, inclusion, and equal employment opportunity. The memorandum will encourage managers and supervisors to value and foster fairness, equity, respect and promote diversity through DOI at all levels. The managers will be 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 also continue to report to DCAS on the steps undertaken to comply with Mayoral Executive Order No. 16 of 2016, including the training of public-facing staff on transgender diversity and inclusion. The agency has complied, and will continue to comply with, the NYC Administrative Law provisions and Mayoral Executive Orders put into place, including those regarding language access, website accessibility and translation, disability services, and hiring practices. For example, in complying with the mandate of Mayoral Executive Order 21 of 2016, restricting inquiring regarding applicant pay history, the agency has removed references to historical salary information on preliminary application forms, including the Personnel Action Review form submitted to Human Resources as part of the final package after the offer of employment has been

accepted, 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 2018 focused on enhancing diversity, equal employment opportunity, and the overall value of inclusion at your agency.

- Align diversity recruiting, internal candidate development and equitable selection practices strategically with current employment needs. This is achieved through the exploration of diverse job resources; encouraging supervisors to foster talent; and encouraging all staff to examine opportunities through job postings, Civil Service examinations, and promotional examinations.
- Continue to conduct diversity recruiting, and in particular, target minority professional and academic 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.
- 3. Provide management and professional training opportunities to all 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. There is also a Five Day Orientation Program for new staff to acclimate them to the agency's operations and practices.
- 4. Identify best practices for establishing a means of inclusive customer services and create opportunities for community outreach in line with the agency's mission and values. Additionally, the agency, in creating and disseminating Requests for Proposals, will be cognizant of the requirements under the City's MWBE programs.

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, including whether a position represents a promotional opportunity.
- 2. Provide current employees who applied for the vacancy and met the minimum qualification requirements with the opportunity to interview for the job.
- 3. Post positions on websites including CityJobs, the City's public website, and city/industry specific websites.
- 4. Participate in job fairs and provide postings to minority organizations and other diverse populations. We also employ college students as interns in order to provide them with a greater understanding of the agency and to promote future employment.
- 5. Use the workforce dashboard and CEEDS data to review the workforce demographics and identify areas where underutilization exists and identify specific job groups where additional recruitment efforts may be required. Additionally, we examine staff statistics that we maintain internally, for our employees and on-loan/DOI-supervised staff as part of meeting our goals.
- 6. We will share job vacancy notices with the Mayor's Office for People with Disabilities and ACCES VR so they can share it with their clients.

Diverse Recruitment Source(s)	What sort of return do you expect to see from the effort?
1. Cityjobs	 We are hopeful that our efforts will allow us to reach a larger diverse population and thereby result in an increasingly diverse workforce. We are also working on ways to track our efforts more closely.
 College and Universities including: John Jay College, Cardozo, New York Law School, Baruch, Pace University, Monroe College, and St. John's University 	2. Same as above
3. Minority organizations and associations including: Asian American Bar Association, The LGBT Bar Association of Greater New York, National Latino Officers Association, National Association of Black Accountants, and 100 Blacks in Law Enforcement Who Care.	3. Same as above

- 4. Specialized Disciplines including: the Association of Inspectors General, National Association of African Americans in Human Resources, Discover Policing, City & State, and the New York Law Journal
- 5. Linkedin
- 6. Indeed
- 7. Specialized recruiting source-Professional Diversity Network

- 4. Same as above
- 5. Same as above
- 6. Same as above
- Diversity recruiting platform through which we anticipate being able to better track the minority and women organizations through which candidates are applying.
- 2. Indicate the type of internship opportunities available at your agency. Please provide the number of student interns employed in FY 2017 and their demographic profiles. Indicate your plans to provide internship opportunities in FY 2018.

DOI currently provides investigative and legal internships. In FY 2017 (Fall 2016, Spring 2017 and Summer 2017), there were a total of 55 DOI interns, an increase from the previous Fiscal Year: 36 female, 19 male, 6 African American, 7 Asian, 10 Hispanic, 2 identifying as being of two or more races, 25 White and 5 Other/Unidentified.

DOI maintains a small number of interns throughout the academic year. We will continue our summer internship program for investigative and legal positions, and seek to recruit a diverse, qualified group from various schools. We have also been proactive in assessing an intern's interest in a full time position at DOI- resulting in 8 permanent hires from this pool. We have instituted a more formal self-reporting program for interns so as to maintain more accurate statistics regarding ethnicity and gender.

B. 55-a Program

 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 2018. 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 available 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.

Based on DCAS' June 7, 2016 -55-a memorandum, DOI will also continue to evaluate the requests of longtime provisional employees for § 55-a designation to serve non-competitively in a competitive title position. DOI will examine whether request are made solely to avoid the consequences of CSL § 65(3) and will inform provisional staff that 55-a certification should not be used as a substitute for passing a civil service exam, where possible.

The agency only has one employee in the 55a-program, at this time. The employee has been with the agency for over ten years and has not sought removal from the program. Although the ability to apply has been publicized, the vast majority of our titles are original jurisdiction and are not subject to a Civil Service Examination. Therefore, although the opportunity is publicized, there have been no applications within the last year.

VI. Selection (Hiring and Promotion)

Please answer the following questions:

For FY 2018, 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 advises employees of current and anticipated promotional opportunities in an employee's stated area of interest. The career counselor will continue to 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 if warranted.

Employees are informed of civil service exam requirements associated with preferred line of work and are encouraged to use 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 the publications noted above. As part of outreach, DOI's Human Resources personnel contact minority professional organizations to inform them of open positions and to solicit a diverse, qualified applicant pool. The agency has also engaged the assistance of Profession Diversity Network- a platform for multiple women and minority professional organizations in various disciplines. 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 make referrals to others who meet the job requirements.

DOI is mindful of demographics as reflected in the CEEDs data, as well as other DOI records, 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's protocol for in title promotions/salary increases includes providing a justification for the promotion/salary increase as part of the Personnel Action Request package. The recommending supervisor must make clear what sets this employee apart from others in the same title so as to justify selecting that employee for the promotion/salary increase. These recommendations are reviewed by Executive Staff as part of the approval process.

The agency head and senior executive staff 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 2018, 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 further develop those procedures by taking into account possible areas for implicit bias (by, amongst

other measures, providing Hiring Managers with guidance regarding appropriate phasing of interview questions) and will improve upon them by creating additional standard questions for the interviews.

DOI, in the past, participated in Disability Mentoring Day in order to meet and possibly hire qualified individuals with disabilities. DOI will consult with the Mayor's Office for People with Disabilities in order to more broadly circulate our postings.

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. Also, DOI will provide increased practical and managerial training opportunities.

- 4. What steps will your agency take in FY 2018 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 NYCAPS Vista reports 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 also uses E-Hire as a comprehensive method to input and track the interview process, which includes self-identification. As such, the EEO Officer reviews the NYCAPS Vista reports as part of the review of the interview logs. Additionally, 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, and our own internal statistics that include our outside (non-DOI-employees) Inspector General Offices, 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 Officer 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:

 Describe steps taken to encourage all employees at your agency to update self-ID information regarding race, ethnicity, gender, 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 indicates the purpose and usefulness of such information. Human Resources also makes employees aware of this tool during their Orientation which takes place on the first weekday of employment.

2. Describe plans to review the CEEDS workforce composition, utilization, new hires and promotions data presented in your quarterly agency workforce dashboard and/or internal workforce reporting. Describe how your agency's EEO Officer, Personnel Officer and General Counsel work together to review demographic trends? Are these reports reviewed regularly with the Agency Head? How often?

On a quarterly basis, the CEEDS workforce data (including new hires, promotions, separations, and underutilization) and internally maintained statistics (including available statistics relating to our Inspector General Offices comprised of non-DOI-employees) are examined in a meeting which includes the Commissioner, First Deputy Commissioner, Director of Human Resources and General Counsel, among others. Trends are analyzed and difference between quarters- increases or decreases in these areas by ethnic group and gender are examined- including a review of the employees' relevant documentation where warranted to determine why an action took place.

VIII. Training:

Please detail planned training for FY 2018 that relates to diversity and inclusion, unconscious bias, career development and/or leadership training, structured interviewing and/or other mandated/best practices training. Please provide a list of dates (where possible) for planned EEO training for new employees during FY 2018 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. Under Executive Order No. 16 of 2016, your agency must provide supervisory and front line staff training approved by DCAS on transgender diversity and inclusion, including the requirements of Executive Order No. 16. Pursuant to Executive Order No. 16, the training for supervisory staff must be completed by March 7, 2017, and the training for front line staff must be completed by March 7, 2018. DCAS will made training under Executive Order 16 available to agencies.

	Type of Audience	Target	Targeted
Training Topic	(Line, HR, Managers and	Number of	Dates
·	Supervisors, combination, etc.) Particip		
1. EEO Training- 2 yr	All DOI Staff and Supervised	465	July 2017-
Mandatory- Live Training	employees from other agencies		December
	where warranted		2017
2. Everybody Matters/CBT	DOI Staff on-boarded since last	300; N/A	May 2018;
	given; New Hires		Open
3. lgbTq- The Power of Inclusion/CBT (note: Executive Order 16 of 2016 training completed)	All remaining DOI investigative staff (Requirement for public-facing managers and staff completed March 2017)	200	Jun 2018- July 2018

4. EEO Training/Presentation or	New Hires and Staff Members	N/A	Quarterly;
CBT			Open

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 completed the NYC Equal Employment Practices Commission (EEPC) triennial audit process. On December 21, 2017, the EEPC issued a Determination of Completion. Please see the attached Determination, and the agency's December 20, 2017 memo to staff regarding the audit, for your records. Thank you.

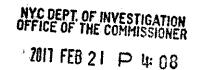
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Print Name of Agency Head

Signature of Agency Head

April 30, 2018

Date





Angela Cabrera Malini Cadambi Daniel Elaine S. Reiss, Esq. Arva R. Rice Commissioners

Charise L. Terry, PHR Executive Director

Judith Garcia Quiñonez, Esq. Executive Agency Counsel

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BY MAIL AND EMAIL

December 21, 2017

Mark G. Peters Commissioner NYC Department of Investigation 80 Maiden Lane 16th Floor New York, NY 10038

Re: Resolution #2017/216-032-C34: Determination of Agency Compliance

Dear Commissioner Peters:

On behalf of the members of the Equal Employment Practices Commission (EEPC or Commission), I want to inform you that the Commission has issued the attached Determination of Compliance to the Department of Investigation. This Commission has determined that the Department of Investigation has implemented the required corrective actions deemed necessary by this Commission for ensuring a fair and effective affirmative employment program of equal opportunity as required by the equal employment opportunity standards of this Commission and Chapters 35 and 36 of the New York City Charter.

On behalf of this Commission, I want to thank you and Principal EEO Professional Chantal N. Senatus for the cooperation extended to the EEPC during the compliance-monitoring period.

Sincerely,

Elaine S. Reiss, Esq.

Commissioner

c: Chantal N. Senatus, Principal EEO Professional, Department of Investigation

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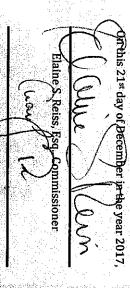
Determination of Compliance

is issued to

Department of Investigation

for successfully implementing 7 of 7 required corrective actions pursuant to the Equal Employment Practices Commission's Employment Practices and Procedures Audit From January 1, 2014 to this date.

In care of Commissioner Mark G. Peters, and Principal EEO Professional Chantal N. Senatus.



Charise L. Terry, PHR, Executive Director



The City of New York Department of Investigation

MARK G. PETERS COMMISSIONER

80 Maiden Lane New York, NY 10038

MEMORANDUM

TO:

DOI STAFF

FROM:

Mark G. Peters, Commissioner

DATE:

December 20, 2017

SUBJECT: Equa

Equal Employment Practices Commission Audit

The New York City Equal Employment Practices Commission ("EEPC"), pursuant to the NYC Charter, has the authority to monitor and evaluate the employment programs, practices, policies and procedures of all city agencies and performs audits of all agencies every three to four years.

The EEPC recently completed an audit of Department of Investigation ("DOI")'s compliance with the City's Equal Employment Opportunity Program between January 1, 2014 and December 31, 2016 and I am pleased to report that DOI was found to be in overall compliance during that period. Promoting the idea of equal opportunity for employees has been a goal during this DOI administration and I am proud of the DOI staff for all of the efforts that have been made to ensure full compliance with both the letter and the spirit of the law.

The EEPC listed only a few recommendations, all of which have been implemented during the six month audit period following the EEPC's initial review. Specifically:

- Assessing the manner in which candidates are selected for employment to determine
 whether there is an adverse impact on any particular protected group and, where such
 impact is found, evaluating and improving our selection criteria and recruitment
 efforts;
- Continuing to annually review statistical information, including EEO complaints, to identify potential barriers to equal opportunity within the agency;
- Ensuring that all EEO Staff attend the appropriate training to ensure that they
 understand their responsibilities under the EEO Policy;

- Maintaining documentation of meetings with the agency head where operational decisions impacting the EEO office are made; and
- Administering a robust annual managerial/non-managerial performance evaluation program.

I reaffirm DOI's commitment to preventing discrimination by ensuring that all employees are aware of their rights and obligations under the EEO Policy and our commitment to maintaining fair employment practices for all employees and applicants.

I encourage all employees to access the resources available within the Department, including through our intranet, and to address any EEO related concerns you may have to Chantal Senatus, Deputy General Counsel and EEO Officer, at 212-825-5928 or csenatus@doi.nyc.gov.

APPENDIX

DOI Equal Employment Opportunity (EEO) Officer

Chantal Senatus

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