

Diversity, Equity, Inclusion and Equal Employment Opportunity (DEI-EEO) Plan

Fiscal Year 2025

**New York City
Department of Investigation**



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I. Annual Commitment, Accountability, and EEO Statement (EEO Policy Statement).

DOI's most important and valuable asset is its people, and DOI is committed to creating a diverse and inclusive workforce and providing opportunities for professional development and advancement to all employees. Our strength is in our diversity -- teams that include, and value, employees with different backgrounds and perspectives perform better. It is my responsibility, with the support of our EEO Officer, all EEO professionals, human resources professionals, legal professionals, managers, and supervisors, to ensure that our agency does not discriminate against employees or applicants for employment and supports our diversity and inclusion initiatives by observing EEO regulations and working toward attaining agency goals in this area. All agency staff must comply with the City's EEO Policy and support our implementation of the FY 2025 Diversity and EEO Plan.

The EEO Policy and law also prohibit sexual harassment, a form of employment discrimination. All DOI employees must familiarize themselves with the EEO Policy's protections against sexual harassment. The EEO Policy incorporates the protection provided by federal, state, and local laws and enforces these provisions by imposing disciplinary action on employees who engage in sexual harassment.

DOI employees have a responsibility to be respectful of all our co-workers and members of the public and to support our commitment to a work environment that values equity, inclusion, and respect for all.

The Agency EEO Officer, Philip Hung, serves as a resource for agency managers and supervisors by providing us with best practices and providing direction in addressing any identified EEO issues. If you have any questions about the EEO Policy, reasonable accommodations, or other EEO matters, you can reach Phil at (212) 825-2848 or phung@doi.nyc.gov. Phil reports directly to me on all matters, including EEO matters. Attached, you will find a list of the agency's EEO Officer, EEO Counselors, the Disability Rights Coordinator, Disability Services Officer and the Career Counselor, which is also posted in your kitchen pantry and on the agency's intranet at: <https://nycdoi365.sharepoint.com/sites/eeo1>.

Also 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. Our EEO staff works closely with DCAS's Office of Citywide Equity and Inclusion.

☐ This statement is the same as last year.

NOTE: If this statement has been in use for more than **two** years the Agency Head should issue a revised statement.

☒ This statement will be disseminated to all employees in the agency.

II. Recognition and Accomplishments

In the past year, our agency accomplished the following as part of our commitment to DEI and EEO:

- Successfully launched an Employee Resource Group (ERG) Pilot Program, which included the formation of six active ERGs who hosted several DEI and employee wellness activities and events. The six ERGs are:
 - a. Asian American and Pacific Islander ERG (cultural ERG)
 - b. Caribbean Heritage Committee ERG (cultural ERG)
 - c. Hispanic Heritage Committee ERG (cultural ERG)
 - d. Jewish American Heritage ERG (cultural ERG)
 - e. Health and Wellness ERG (employee wellness ERG)
 - f. Assistant Inspector General / Deputy Inspector General ERG (professional development ERG)
- Developed and implemented a Five-Year Accessibility Plan to improve services to individuals with disabilities.
- Utilized social media to communicate DOI's work and recruitment initiatives to the public.
- Held quarterly Town Hall meetings with all agency staff for the Commissioner and agency leadership to communicate new developments, recognize employee achievements, and promote teamwork and collective accomplishments.
- Successfully held annual employee-focused events, such as an Employee Appreciation Softball Game, as well as periodic events, such as monthly agency-wide gatherings to provide and promote convenient opportunities for employees to meet and talk with their colleagues and unit-specific workgroups with agency leadership for more focused discussions between teams and agency leadership.
- Conducted an Employee Engagement Survey to gauge employee morale, satisfaction, and engagement at DOI, delivered a summary of the results to staff, and initiated actions to address survey results.
- Expanded recruitment efforts and methods to address underutilization.

III. Workforce Review and Analysis

Please provide the total agency headcount as of 6/30/2024

Total Headcount: 272

1. Pursuant to Local Law 27 of 2023, DOI is required to perform annually an analysis of the Agency's compensation data and measures to address pay disparity and occupational

segregation (“Pay Parity Analysis”). The term “occupational segregation” means a group’s under-representation or over-representation in certain jobs or fields of work, when such group is protected by the employment related provisions of the City’s human rights law and such group does not benefit from greater pay, responsibility, flexibility, stability, prestige, or other indicators of job desirability. To do this analysis, DOI must identify titles where pay disparity exists and salaries vary within the same title when compared by years of service. DOI must also conduct a comparison of women and racial or ethnic minority group members.

- a. DOI’s EEO Office examined pay and demographics data for major functional job groups within the Agency using data generated on August 9, 2024. The EEO Office found no pay disparity among functionally equivalent titles that cannot be attributed to length of service. In particular, recent cost of living adjustments pursuant to Mayor’s Personnel Orders and, to a lesser extent, collective bargaining agreements, affected pay parity in all job categories. However, the impact corresponds to length of service, and we observed no pay disparity based on any other factor. Among leadership roles, Commissioners, Directors, and Inspectors General all earn salaries in accordance with their functional titles, responsibilities, experience, and years of service. Inspectors General, in particular, are all paid the same or similar salaries – minor differences are wholly attributable to length of service. Among Investigative Supervisors, Deputy and Assistant Inspectors General are paid the same or similar salaries. With respect to DOI’s largest job group, Confidential Investigators, the EEO Office found that all three levels within this group, as well as the Special Investigators, were all generally paid the same salary when compared to functional equivalents. Within the Investigative Specialist job group, the EEO Office found that Investigative Attorneys are generally paid similar salaries when compared to functional equivalents. As such, for the FY 2024 Local Law 27 Pay Parity Analysis, the EEO Office concluded that there is no pay disparity at DOI. However, the EEO Office found some indicators of occupational segregation in the Inspector General job group, as there is overrepresentation of one ethnic category and underrepresentation among all others. While this job group is small, it nonetheless represents senior leadership at DOI and plays a major role in DOI’s important investigative work. As such, DOI will continue to expand diversity recruitment initiatives, including within this job group, to address indicators of occupational segregation.
2. In FY 2025, the agency will remind and encourage its employees to update self-ID information regarding race/ethnicity, gender, and veteran status through any of the following means:
 - ☒ NYCAPS Employee Self Service (by email; strongly recommended every year)
 - ☐ Agency’s intranet site
 - ☐ On-boarding of new employees

- ☒ Employees unable to complete the self-identification form using ESS will be provided an opportunity to submit paper form to the EEO Office.
- ☒ In FY 2025, the agency will inform and remind employees of the option to add preferred name in ESS.

Below please provide the number of employees in your agency whose demographic information is unknown (these numbers are available on the total line of CEEDS report EBEPR210).

Unknown Race/Ethnicity 37 Unknown Gender 2 Unknown Both 2

- ☒ The agency conducts regular reviews of the CEEDS workforce reports, and the summary dashboard sent to the EEO Officer by DCAS' Citywide Equity and Inclusion (CEI) to provide demographic data and trends. The review includes an analysis of workforce composition by job title, job group, race/ethnicity, and gender for all employees; new hires, promotions, and separation data; and utilization analysis.

Agency Head

☒ Quarterly ☐ Semi-Annually ☐ Annually ☐ Other _____

Human Resources

☒ Quarterly ☐ Semi-Annually ☐ Annually ☐ Other _____

General Counsel

☒ Quarterly ☐ Semi-Annually ☐ Annually ☐ Other _____

Other (Deputy Commissioner/Chief of Investigations, Deputy Commissioner of Operations, Deputy Commissioner for Strategic Initiatives and Special Investigations)

☒ Quarterly ☐ Semi-Annually ☐ Annually ☐ Other _____

- ☒ The agency review entails a discussion concerning perceived workplace barriers for job groups that may surface in underutilization reports and for factors that may be creating these barriers (e.g., hiring patterns in specific job titles).

iv. EEO, Diversity, Inclusion, and Equity Initiatives for FY 2025

A. WORKFORCE

State your Agency's general goals and strategies to enhance DEI and EEO aimed to enhance your agency workforce.

DOI values a diverse workforce and believes that diversity is a strength that contributes to its investigative mission. DOI seeks to enhance diversity in its workforce by expanding recruitment to attract diverse applicant pools and making it easier to identify and address EEO issues by prioritizing its EEO program in agency operations.

DOI values a strong and diverse workforce. DOI successfully maintained a diverse workforce throughout FY 2024 by fostering a strong working relationship between its EEO Office, Human Resources, Training Unit, and Executive Staff. This strong working relationship ensures steadfast support of EEO and DEI initiatives at the highest levels of the Agency and promotes their success. As an example of this commitment to diversity in its workforce, DOI has two executive-level Deputy Commissioners leading all EEO and DEI initiatives. Through constant communication about underutilization statistics and recruitment and selection strategies, DOI continues to identify ways to improve diversity in its workforce.

Planned Programs, Initiatives, Actions aimed at Workforce:

Throughout FY 2024, DOI experienced underutilization of Black employees within the Technicians job group. DOI recognizes the significance of this, as the Technicians job group is part of DOI's Confidential Investigators and Special Investigators, the largest part of DOI's workforce. These employees also form the foundation of DOI's important investigative work. As such, DOI seeks to address underutilization in FY 2025 through the following targeted strategies:

1. Human Resources will continue to perform targeted recruitment outreach to diversity focused applicant pools, such as diversity-focused job boards, schools, and professional organizations.
2. The EEO Office will perform and report on quarterly demographics analysis of job applicants to ensure that DOI is receiving applications from diverse candidates.
3. The EEO Office will perform quarterly reviews of select hirings and promotions in underutilized job groups to ensure that recruitment and selection practices promote equity and diversity.

4. The EEO Office and Human Resources will develop a written guide for hiring managers to minimize unconscious bias and other issues that hinder fair and equitable hiring.
5. DOI will require all hiring managers to complete Unconscious Bias training, which is currently not a citywide requirement, at least once every two years.

B. WORKPLACE

State your Agency's general goals and strategies to enhance DEI and EEO aimed to enhance your agency workplace and cultural environment.

DOI seeks to attract and retain a diverse workforce by celebrating diversity internally and promoting and supporting its ERG program.

DOI believes that a safe, inclusive, and supportive work environment is instrumental in fostering professional growth and job satisfaction. These in turn translate to overall agency success. The strong working relationships between DOI's EEO Office, Human Resources, the Training Unit, and Career Development, with the full support of executive leadership, have enabled DOI to meet and exceed its goals with respect to enhancing DOI's workplace and cultural environment.

Planned Programs, Initiatives, Actions aimed at Workplace:

In FY 2024, DOI established a DEI Committee headed by two Deputy Commissioners, one of whom is the EEO Officer. The Committee consists of members from the EEO Office, Human Resources, Career Development, and Legal Affairs. Through this DEI Committee, DOI successfully launched its ERG Pilot Program. DOI currently has an ERG Handbook, which serves as a reference guide for starting and operating ERGs, and a dedicated DEI and ERG intranet webpage. DOI is extremely proud of its six active employee-led ERGs, four of which represent major cultural groups at DOI. In FY 2024, these ERGs successfully hosted heritage and wellness events for the Agency, which improved the overall workplace culture of DOI. DOI will build upon these milestones in FY 2025.

- ☒ Promote employee involvement by supporting Employee Resource Groups (ERGs).
List below the names of existing ERGs:

- 1.Asian American and Pacific Islander ERG (cultural ERG)
- 2.Caribbean Heritage Committee ERG (cultural ERG)
- 3.Hispanic Heritage Committee ERG (cultural ERG)
- 4.Jewish American Heritage ERG (cultural ERG)
- 5.Health and Wellness ERG (employee wellness ERG)

6. Assistant Inspector General / Deputy Inspector General ERG (professional development ERG)

- ☐ Agency does not presently have any ERGs.
- ☐ Agency will create a Diversity Council to leverage equity and inclusion programs
- ☒ Agency Diversity Council is in existence and active
- ☒ Agency will sponsor focus groups, Town Halls and learning events on race, equity, and inclusion
- ☒ Agency will inform employees of their rights and protections under the New York City EEO Policy
- ☒ Agency will ensure that its workplaces post anti-hate or anti-discrimination posters

C. COMMUNITY and EQUITY, INCLUSION and RACE RELATIONS

State your Agency's general goals and strategies to enhance DEI and EEO in areas of Community and Race Relations.

DOI seeks to enhance community equity and inclusion by having initiatives that promote contracting opportunities and accessibility for communities of color.

As a law enforcement and oversight agency, DOI serves the public through its investigative work. While DOI does not deliver services or programs directly to the public, its investigative work can impact delivery of services by other City agencies and entities. Many of these programs and services are designed to serve underprivileged communities and communities of color. Fraud and corruption erode public trust, and as such, DOI's work serves as a powerful way to rectify and build trust and accountability, including among underprivileged New Yorkers and communities of color. Aside from these indirect roles that DOI plays with respect to Community, Equity, and Race Relations, DOI's contracting and accessibility initiatives have the potential to directly impact communities of color and improve equity and race relations.

Planned Programs, Initiatives, Actions aimed at Community, Equity and Race Relations:

DOI's initiatives for FY 2025 will focus on contracting and procurement strategies to increase opportunities for minority and women owned businesses and firms (MWBE) to do business with DOI. DOI also developed and implemented a Five-Year Accessibility Plan in FY 2024 in coordination with the Mayor's Office for People with Disabilities. This Plan was designed to reduce barriers for individuals with disabilities to access DOI's website, facilities, and services. DOI plans to continue to implement the Plan in FY 2025.

In FY 2025, the agency will:

- ☐ Continue or plan to promote diversity and EEO community outreach in providing government services
- ☒ Promote participation with minority and women owned business enterprises (MWBES)
- ☒ Expand language services for the public

V. Recruitment

A. Recruitment Efforts

DOI improved its recruitment strategies and practices in FY 2024, in part, to build and retain a diverse and inclusive workforce. Strategies included: posting DOI jobs on several external sites, including City & State and Professional Diversity Network; engaging with affinity groups at CUNY and SUNY schools and minority bar associations; promoting civil service list calls; emailing promotional opportunities internally; and enhancing DOI's internship program. DOI completed several of those initiatives in FY 2024, and deferred others. In FY 2025, DOI will focus on those initiatives that DOI deferred from FY 2024.

NOTE: This section must be prepared jointly by Agency DEI-EEO and HR.

B. Recruitment for Civil Service Exams

The majority of DOI's workforce is comprised of staff in non-competitive titles for which civil service examinations are not applicable or required. The below list of planned activities is for all of DOI's recruitments, a small portion of which includes civil service examination eligible job categories. DOI continues to plan these activities for FY 2025 and will provide updates in the coming quarters.

List any planned recruitment events for FY 2025 that will be held by the agency to promote open-competitive civil service examinations.

Event Date	Event Name	Borough
08/09/2024	North East Black Law Students Association Job Fair	Manhattan

List planned expenditures for FY 2025 related to recruiting candidates for open-competitive and promotion civil service exams.

Borough	Approximate Dollar Amount (\$)
Bronx	
Brooklyn	

Manhattan	\$450.00
Queens	
Staten Island	
Other (include online)	

C. Recruitment Sources

1. External Job Sites – LinkedIn, lawjobs.com, Indeed, and Professional Diversity Network. Through external postings, DOI seeks to attract minority applicants – in particular Black applicants for investigator positions – and has successfully hired employees through external postings.

2. Job Fairs – at SUNY and CUNY schools, as well as private colleges and law schools. DOI's Career Development Unit and Human Resources actively participates in job fairs at local colleges and universities. DOI seeks to attract minority and female applicants and has successfully hired employees through job fairs.

3. Affinity Groups – at schools and minority bar associations. DOI's Career Development Unit and Human Resources engage with Affinity Groups at local colleges and universities as well as minority bar associations. DOI seeks minority applicants and has successfully hired employees through Affinity Group engagements.

D. Internships/Fellowships

The agency provided the following internship opportunities in FY 2024:

Type of Internship\Fellowship	Total	Race/Ethnicity *[#s] * Use self-ID data	Gender * [#s] * Use self-ID data
1. Urban Fellows	0		M __ F __ Non-Binary __ Other __ Unknown __
2. Public Service Corps	0		M __ F __ Non-Binary __ Other __ Unknown __
3. Summer College Interns	0		M __ F __ Non-Binary __ Other __ Unknown __
4. Summer Graduate Interns	0		M __ F __ Non-Binary __ Other __ Unknown __
5. Civil Service Pathways Fellows	0		M __ F __ Non-Binary __ Other __ Unknown __

6. Other (Fall Graduate Interns)	5	Black_2__ Hispanic_1__ Asian/Pacific Islander_1__ Native American_0__ White_2__ Two or more Races_0__	M_4__ F_1__ N-B_0__ O_0__ U_0__
7. Other (Fall Legal Interns)	6	Black_0__ Hispanic_1__ Asian/Pacific Islander_0__ Native American_0__ White_5__ Two or more Races_1__	M_2__ F_4__ N-B_0__ O_0__ U_0__
8. Other (Spring Undergraduate Interns)	10	Black_2__ Hispanic_1__ Asian/Pacific Islander_2__ Native American_0__ White_5__ Two or more Races_0__	M_5__ F_4__ N-B_0__ O_0__ U_1__
9. Other (Spring Graduate Interns)	4	Black_0__ Hispanic_1__ Asian/Pacific Islander_1__ Native American_0__ White_2__ Two or more Races_0__	M_3__ F_1__ N-B_0__ O_0__ U_0__
10. Other (Spring Legal Interns)	3	Black_0__ Hispanic_1__ Asian/Pacific Islander_0__ Native American_0__ White_3__ Two or more Races_1__	M_1__ F_2__ N-B_0__ O_0__ U_0__
11. Other (Summer Undergraduate Interns)	26	Black_2__ Hispanic_3__ Asian/Pacific Islander_7__ Native American_0__ White_15__ Two or more Races_2__	M_12__ F_14__ N-B_0__ O_0__ _0__ U_0__

12. Other (Summer Graduate Interns)	4	Black_0__ Hispanic_0__ Asian/Pacific Islander_0__ Native American_0__ White_1__ Two or more Races_0__	M_1__ F_0__ N-B_0__ O_0__ U_0__
13. Other (Summer Legal Interns)	6	Black_0__ Hispanic_0__ Asian/Pacific Islander_2__ Native American_0__ White_4__ Two or more Races_0__	M_5__ F_1__ N-B_0__ O_0__ U_0__

E. 55-a Program

Section 55-a of the New York State Civil Service Law allows a qualified person with a certified mental or physical disability to be hired into a competitive civil service position without having to take and pass a civil service examination. The City encourages agencies to use the 55-a program as a tool to build a diverse workforce and create greater access to City employment for qualified candidates with disabilities.

- Presently, the agency employs 0 [number] 55-a participants.
- There are 0 [number] participants who have been in the program less than 2 years.
- In the last fiscal year, a total of 0 [number] new applications for the program were received and 0 participants left the program due to [state reasons] _____.

☒ Agency uses mostly non-competitive titles which are not eligible for the 55-a Program.

☐ Agency does not use the 55-a Program and has no participating employees.

VI. Selection (Hiring and Promotion)

NOTE: This section must be prepared jointly by Agency HR and DEI-EEO. HR must describe the activities and plans of Agency Career Counselors in A) below. EEO must respond to questions in C) below.

A. Career Counselors

DOI's Career Counselors actively promote advancement opportunities within the agency. For example, DOI's Career Development Unit collects all open job opportunities and makes those

opportunities available for both interns and staff. Human Resources sends agency-wide email notifications to communicate open job postings that are available to staff. In general, for the majority of open positions, DOI hiring managers interview all internal applicants who meet minimum qualifications. In FY 2024, DOI deferred the initiative to display DOI's job openings on its internal intranet page and on television screens around DOI's office spaces. DOI will explore these initiatives in FY 2025.

B. New Hires and Promotions

Throughout FY 2024, DOI experienced underutilization of Black employees in the Technicians job group. DOI recognizes the significance of this, as the Technicians job group is part of DOI's Confidential Investigators and Special Investigators, the largest part of DOI's workforce. These employees also form the foundation of DOI's important investigative work. As such, DOI seeks to address underutilization in FY 2025 through the following targeted strategies:

1. The EEO Office will perform and report on quarterly demographics analysis of job applicants to ensure that DOI is receiving applications from diverse candidates.
2. The EEO Office will perform quarterly reviews of select hirings and promotions in underutilized job groups to ensure that recruitment and selection practices promote equity and diversity.
3. The EEO Office and Human Resources will develop a written guide for hiring managers to minimize unconscious bias and other issues that hinder fair and equitable hiring and promotions.
4. DOI will require all hiring managers to complete Unconscious Bias training, which is currently not a citywide requirement, at least once every two years.

C. EEO Role in Hiring and Selection Process

In FY 2025, the agency EEO Officer will do the following:

- ☒ Ensure that all vacancy announcements include the revised NYC EEO Anti-Discrimination Statement.
- ☒ Review vacancy postings to ensure elimination of language that has the potential for gender and age stereotyping and other unlawful discrimination. (It is recommended to use gender-neutral terms and pronouns and language that is age-inclusive).
- ☒ Actively monitor agency job postings and ensure recruitment strategy aligns with the diversity goals of the agency.
- ☒ Provide consultation regarding creation/review of objective criteria for evaluating candidates for hire or promotion and applying those criteria consistently to all candidates.

- ☒ In collaboration with the Director of Human Resources, review interview questions to ensure that they are EEO-compliant, job-related, and required by business necessity.
- ☒ Assist the hiring manager if a reasonable accommodation is requested for an interview.
- ☒ Advise Human Resources to use candidate evaluation form for uniform assessment and equity.
- ☒ Periodically review candidate evaluation forms and conduct a job applicant analysis via the NYCAPS eHire Applicant Interview Log and/or SmartRecruiter reports to advise Human Resources of any demographic trends and/or EEO concerns based on available self-ID data.
- ☒ Review hiring package to evaluate that the selection process was conducted in accordance with EEO best practices.
- ☐ Other: _____

D. Layoffs

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?

- ☒ The agency will use the DCAS Layoff Procedure as guidance, should there be any layoffs, terminations, and demotions due to legitimate business/operational reasons in FY 2025.
- ☒ The agency will analyze the impact of layoffs or terminations on racial, ethnic, gender, age groups, and people with disabilities.
- ☒ Where layoffs or terminations would have a disproportionate impact on any of these groups, the agency will document that the targeted titles or programs were selected based on objective criteria and justified by business necessity.
- ☒ The Agency Personnel Officer, EEO Officer and General Counsel will be involved in making layoff or termination decisions. It should be noted that layoffs must be conducted by seniority in compliance with civil service law (for competitive titles) and union contract (for non-competitive and labor class titles).

VII. Training

Training Topic	Type of Audience (e.g., All Staff, Front-line Employees, Managers, Supervisors, etc.)	Goal Number of Participants	Projected Dates
1. Everybody Matters: EEO and Diversity & Inclusion Training for NYC Employees (e-learning)	All employees – Biennially (Cycle 2 must be completed by March 31, 2025.)	100%	02/01/2025 (launch) 02/28/2025 (deadline)
2. Everybody Matters: EEO and Diversity & Inclusion Training for NYC Employees (classroom/live webinar)	All employees – Biennially (Cycle 2 must be completed by March 31, 2025.)	100%	N/A
3. Sexual Harassment Prevention (e-learning)	All employees – Annually (Cycle 7 runs between September 1, 2024 – August 31, 2025)	100%	07/01/2025 (launch) 07/31/2025 (deadline)
4. Sexual Harassment Prevention (classroom/live webinar)	All employees – Annually (Cycle 7 runs between September 1, 2024 – August 31, 2025)	100%	N/A
5. lgbTq – Power of Inclusion (e-learning)	Managers, Supervisors, and Front-line employees (must be completed by March 31, 2026) All other employees	100%	02/01/2026 (launch) 02/28/2026 (deadline)
6. lgbTq – Power of Inclusion (classroom/live webinar)	Managers, Supervisors, and Front-line employees (must be completed by March 31, 2026) All other employees	100%	N/A
7. Disability Awareness and Etiquette	All employees. Currently not a Citywide requirement, but DOI will mandate completion pursuant to our Five-Year Accessibility Plan	100%	TBD
8. Structured Interviewing and Unconscious Bias (classroom/live webinar)	All Hiring Managers	25%	TBD
9. Other (specify)			
10. Other (specify)			

VIII. Reasonable Accommodation

- ☒ Managers, supervisors, human resources personnel and discipline personnel are required to report to the EEO Office any reasonable accommodation requests and needs that are received, observed, learned about, or suspected, so that the EEO Office may facilitate discussions, research appropriate accommodations, and assist with the resolution of the matter.
- ☒ Absent of any undue hardship, the agency provides reasonable accommodation for disability, religion, victims of domestic violence, sex offense and stalking, pregnancy, childbirth, or a related medical condition.
- ☒ The agency follows the City's Reasonable Accommodation Procedure.
- ☒ The agency implemented the modifications of Reasonable Accommodation Procedure announced in May 2024.
- ☒ The agency initiates the cooperative dialogue within 10 days from the request for Reasonable Accommodation.
- ☒ The agency grants or denies request within 15 days after from the conclusion of cooperative dialogue.
- ☒ When necessary, in certain time-sensitive circumstances the agency conducts and expedited review and grants or denies request in less than 15 days.
- ☒ The Agency Head or designee must review and grant or deny an appeal fifteen (15) days after submission of appeal.
- ☒ If the review and decision on appeal is not done by the Agency Head.
Provide the name and title of the designee¹: Kaytlin Simmons, Deputy Commissioner of Operations
 - ☒ The designee reports directly to the Agency Head.
- ☒ The agency will input the Reasonable Accommodation activity on the DCAS Citywide Complaint and Reasonable Accommodation (CAD) Database and update the information as needed.

¹ EEO Officer and General Counsel should **NOT** be appointed as agency head designee for review of appeals to reasonable accommodation decisions. Refer to the revised guidelines below. Note the conflict of interest; in the event of an external challenge to the denial of a reasonable accommodation, the agency's General Counsel would be tasked with defending the agency against a decision in which that office was a decision maker on appeal.

IX. Compliance and Implementation of Requirements Under Local Laws and Mayoral Executive Orders

A. Local Law 92 (2018): Annual Sexual Harassment Prevention training

- ☒ The agency plans to train all new employees on Sexual Harassment Prevention within 30 days of start date.
- ☒ The agency will train all current employees on Sexual Harassment Prevention (Cycle 7 – September 1, 2024 – August 31, 2025) as indicated in the Section VII Training above.

B. Local Law 97 (2018): Annual Sexual Harassment and Complaint Reporting

- ☒ The agency will ensure that sexual harassment complaints, and all other EEO complaints, are investigated and closed within 90 days.
- ☒ The agency will input sexual harassment complaint data, as well as all other types of complaints, on the DCAS Citywide Complaint and Reasonable Accommodation (CAD) Database, contemporaneously update the information, and affirm the data in a timely manner when requested by DCAS.

C. Local Law 121 (2020): Age Discrimination Training

- ☒ The agency plans to train all new employees on Everybody Matters: EEO and Diversity & Inclusion Training for NYC Employees within 30 days of start date.
- ☒ The agency will train all current employees on Everybody Matters: EEO and Diversity & Inclusion Training for NYC Employees (Cycle 2: April 1, 2023 – March 31, 2025) as indicated in the Section VII Training above.

D. Local Law 27 (2023): Access to Workplace Facilities

- ☒ Employees have access to gender appropriate bathrooms and lactation rooms.
- ☒ Employees are provided with information on how to request workplace accommodations and has access to respective facilities, including access for individuals with disabilities.

Types of accommodations that the agency has provided to its workforce in FY 2024.

- ☐ Reassignment
- ☒ Modification of Work Schedule

- ☒ Flexible leave
- ☐ Modification or Purchase of Furniture and Equipment
- ☒ Modification of Workplace Practice, Policy and/or Procedure
- ☐ Grooming/Attire

E. Local Law 27 (2023): Diversity and Inclusion Training for FY 2025

- ☒ List of diversity and inclusion training for FY 2025 is included in section VII of this annual plan.

F. Local Law 27 (2023): Workforce Information Report for FY 2024

- ☒ The agency will submit the mandated annual report with workforce information to the Mayor, the Speaker of the Council, the Department of Citywide Administrative Services, and the Equal Employment Practices Commission by September 30, 2024.

G. Local Law 28 of (2023): Diverse Recruitment and Retention in City Government

Under LL 28 (2023), agencies must provide information about agency-specific training programs that are required for, or relevant to, an applicant's appointment to a position based on an open-competitive or promotional civil service examination. Additionally, agencies must provide information on expenditures related to recruiting candidates for open competitive and promotional civil service examinations, a list of recruiting events to promote open-competitive civil service examination and a list of any preparatory materials developed for applicants or potential applicants for open-competitive and promotional civil service examinations.

- ☒ The agency submitted all information required by LL 28 for FY 2024 using the form and templates provided.

H. Executive Order 16: Training on Transgender Diversity and Inclusion

Under Executive Order No. 16 of 2016, the agency must provide supervisory and front-line staff training approved by DCAS on transgender diversity and inclusion. Pursuant to Executive Order No. 16, this training must be provided to all newly hired supervisory and managerial employees and line staff whose work tasks involve contact with the public. The current Cycle 5 runs from April 1, 2024, to March 31, 2026.

- ☒ The agency plans to train all new employees within 30 days of start date.
- ☒ All managers, supervisors, and front-line employees will be re-trained every two years, no later than the third quarter of the Fiscal Year, as indicated in Section VII Training above.
- ☒ In addition, all other employees will be trained or re-trained every two years, as indicated in Section VII Training above.

- ☒ The agency will ensure that the Transgender Restroom Access notice/poster is posted where required, e.g., on bulletin boards, near restrooms and, in digital form, where other EEO notices and announcements can be found.

X. Audits and Corrective Measures

- ☐ The agency is NOT involved in an audit conducted by NYC EEPC or another governmental agency specific to our EEO practices.
- ☐ The agency is currently being audited or preparing responses to an audit conducted by the EEPC or _____ specific to our EEO practices. Upon forwarding our responses to the recommendations issued by the EEPC, the agency will submit to OCEI an amendment letter, which shall amend the agency plan for FY 2024 to include and implement EEPC recommendations that will be implemented during the fiscal year.
- ☐ The agency is subject to any other oversight or review by a federal, state or city civil rights agency _____.
- ☐ Within the last two years the agency was involved in an audit conducted by the EEPC or _____ specific to our EEO practices.
- ☐ The agency will continue/be required to implement corrective actions during the year that this plan is in effect.
- ☒ The agency received a Certificate of Compliance from the auditing agency.

XI. Agency Head Signature

Jocelyn E. Strauber

Print Name of Agency Head



Signature of Agency Head

3/3/25

Date

Appendix A: Contact Information for Agency EEO Personnel and Career Counselors *

Agency EEO Office mailing address: New York City Department of Investigation
180 Maiden Lane
New York, NY 10038

	Title/Function	Name	Email	Telephone
1.	Agency EEO Officer	Philip Hung	phung@doi.nyc.gov	212-825-2848
2.	Agency Deputy EEO Officer	Patrick McGrath	pmcgrath@doi.nyc.gov	212-825-3722
3.	Agency (Chief) Diversity & Inclusion Officer	Kaytlin Simmons	ksimmons@doi.nyc.gov	212-825-2407
4.	Chief Diversity Officer/Chief MWBE Officer per E.O. 59	Kaytlin Simmons		
5.	ADA Coordinator	Shayvonne Nathaniel	snathaniel@doi.nyc.gov	212-825-5939
6.	Disability Rights Coordinator	Shayvonne Nathaniel		
7.	Disability Services Facilitator	Shayvonne Nathaniel		
8.	55-a Coordinator	Shayvonne Nathaniel		
9.	EEO Investigator(s)	None Designated		
10.	EEO Counselor(s)	Celeste Sharpe Gladys Cambi Gabriel Lipker Laura McCalla Shameika Nixon Katherine O'Toole	csharpe@doi.nyc.gov gcambi@doi.nyc.gov glipker@doi.nyc.gov lmccalla@doi.nyc.gov snixon@doi.nyc.gov kotoole@doi.nyc.gov	718-901-6675 212-825-3240 212-825-2802 212-825-2892 212-825-0812 212-825-3711
11.	EEO Training Liaison(s)	Philip Hung Patrick McGrath		
12.	Career Counselor(s)	Shayvonne Nathaniel		

13.	Other (specify)			
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