



Best Practice: Anti-Corruption Educational Campaign

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CITY: NEW YORK CITY

POLICY AREAS: PUBLIC INTEGRITY

BEST PRACTICE

In 2002, the New York City Department of Investigation (“DOI”) initiated a comprehensive **Corruption Prevention Lecture Program** to educate City employees and City vendors about DOI and the City’s anti-corruption laws. Each year, DOI Inspectors General and investigators present hundreds of these prevention lectures that put a face to the City’s anti-corruption agency and educate City employees about the unique Executive Order that affirmatively mandates them to report wrongdoing and corruption, and about the Whistleblower Protection Law that protects them if/when they do report corruption. The lecture program is one of the cornerstones of DOI’s multi-pronged anti-corruption strategy: stop corruption through investigations and arrests; avoid recurrence through the issuance of procedural recommendations to City agencies suggesting remedies for vulnerabilities found during DOI investigations; and deterrence by educating key stakeholders about the City’s anti-corruption efforts through the robust corruption prevention lecture program.

ISSUE

In order to be effective, an integrity agency must promulgate its mission, the laws supporting anti-corruption efforts, and the individuals within its agency who should be contacted with reports of wrongdoing.

GOALS AND OBJECTIVES

The goals are to elevate the profile of the agency providing City workers and individuals who do business with the City fundamental information about the City’s integrity rules and regulations and provide direct contact with the City’s anti-corruption agency. The program promotes the agency’s accessibility via its interactive website and complaint hotline, and establishes direct relationships with the Inspectors General so that potential complainants will not only know who to contact at DOI, but will feel more comfortable doing so. These lectures establish a timely and personal conduit for the City to reinforce its anti-corruption rules and laws. They are also especially instructive and are used for remediation after wrongdoing or corruption is exposed at an agency.

IMPLEMENTATION

The “Corruption Prevention Lecture Program” is an educational program delivered by DOI’s Inspectors General to the agencies they oversee, the vendor community, and others who receive City funds. The attendees of a lecture will typically include the City employees of a particular division of the agency, or vendors doing business with the City from a particular industry. Inspectors General are supposed to conduct lectures in the agencies they oversee each year, targeting divisions or groups on a cyclical basis, or where an investigation has revealed a particular need. While the lectures universally present the basic laws and conflict rules, they also enable the Inspectors General to target particular corruption problems or vulnerabilities within an individual City agency or relevant group of stakeholders. By doing so, the Inspectors General directly connect with the agencies they oversee, and allow City workers who attend these lectures to become partners in the City’s anti-corruption efforts. The sharing of information that takes place at and as a result of the lectures is mutually beneficial in that DOI meets vendors and new personnel from the agencies it oversees, and learns in a timely manner of new issues that individuals feel should be examined.

Below is a general outline for a typical lecture that can be amended for a specific target audience or to address a particular issue:

- I. DOI’s Role and History in Promoting and Maintaining Integrity in Government
 - a. DOI’s responsibilities as they relate to anti-corruption efforts
 - b. Description of relevant anti-corruption, integrity, and ethics statutes

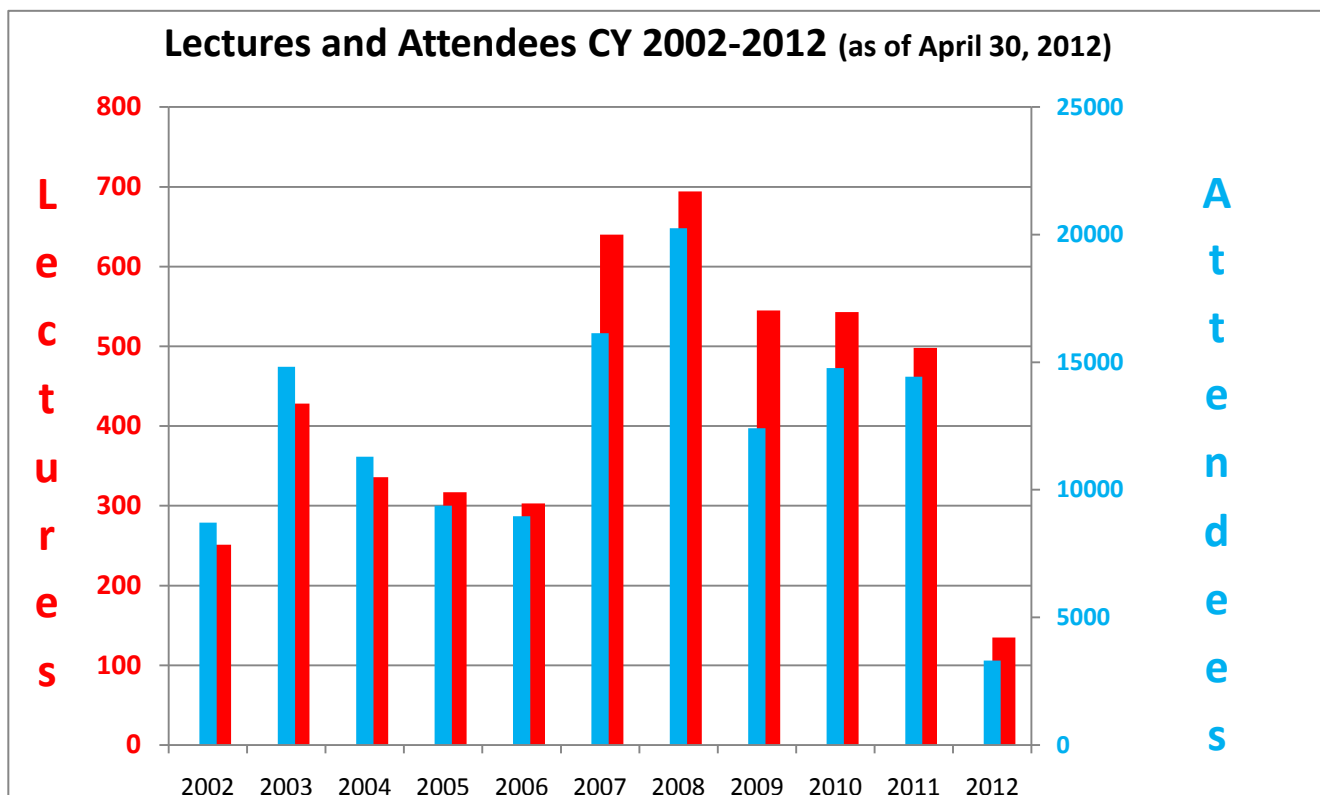
Best Practice: Anti-Corruption Educational Campaign

2. Corruption Awareness and Reporting Guidelines

- a. Description of relevant penal laws, i.e. bribery, gratuity, official misconduct, conflict of interest
- b. Corruption reporting procedures
- c. Case examples
- d. Important contact numbers

DOI executives regularly review with Inspectors General what should be included in corruption prevention lectures, such as current issues presented by pending investigations, and that they are conducted in a timely manner and maintain a consistent message. Inspectors General also share with one another issues they are identifying and investigating in the respective agencies they oversee because an issue at one agency may mean a similar issue at another; DOI's citywide jurisdictional purview is of great benefit in this regard. DOI's weekly CompStat program is the forum at DOI for this cross-pollination of ideas and information. In weekly CompStat meetings of DOI executives and Inspectors General, the work of one Inspector General's unit is reviewed in depth based on current investigations and a number of other indices, including the corruption prevention lectures they present. For example, a discussion about an investigation by an Inspector General about poor inventory and security controls at a City agency warehouse that led to multiple thefts would mean that the controls at all other City agencies with warehouses would then be reviewed by the other Inspectors General as a result of the CompStat discussion. Targeted lectures would also be conducted at the relevant agencies as an additional means of addressing the multi-agency issue.

The lecture program began in 2002 as part of DOI's comprehensive outreach effort. Since then DOI has conducted more than 4,600 lectures to tens of thousands of City employees. As a result, the number of tips and complaints received by DOI also increased. The following chart illustrates the number of these lectures and the number of City workers who attended in calendar years 2002-2012.





Best Practice: Anti-Corruption Educational Campaign

COST

The program is delivered by DOI's existing Inspectors General and their staffs who present the lectures as part of their overall mission and outreach to the agencies they oversee and in which they conduct investigations. The program draws on the resources of the Inspector General units and must be worked into time spent on investigations. Printed materials such as handouts and posters that highlight the agency's mission, contact numbers, and the laws protecting City employees are distributed as part of the corruption prevention lecture program.

RESULTS AND EVALUATION

The corruption prevention lecture program is a unique and substantial way for DOI to connect with the City agencies and entities it oversees and to generate tips and reports of corruption, an effort that has been especially successful for spurring tips to DOI. Inspectors General have consistently reported that they receive tips after presenting these lectures. By way of tangible results, tips reported to DOI have increased a dramatic 55% since Fiscal Year 2002 – the year the corruption prevention lecture program began – from approximately 8,770 in FY '02 to 13,625 in FY '11. Contributing factors to the increase include greater publication by DOI of its investigations, writing and publication of reports, an online complaint form implemented in 2002 that allows individuals to file complaints electronically on the DOI website, and the outreach from DOI's corruption prevention lecture program.

Some of the tips received by DOI have resulted in significant criminal cases. For example, DOI received a tip from a person who attended a lecture that became a high-profile corruption investigation that yielded the arrest and conviction of a New York State legislator. The DOI undercover investigation that commenced as a result of the tip received at the lecture revealed that the legislator had been using her role and official position in the City's housing development process as a bargaining chip with a developer to illegally obtain property for herself. The legislator was removed from office and sentenced to prison as a result of the conduct DOI uncovered.

DOI also used its corruption prevention program as part of a more extensive effort to change the culture of corruption at the Department of Buildings ("DOB"). After DOI arrested 19 DOB inspectors in 2002 in a large-scale bribery case that wiped out the DOB's entire plumbing-inspection unit, DOI took a number of steps to break the cycle of corruption, including bringing action against a DOB employee who had failed to report corruption and embarking on the arrest not only of the City inspectors who took bribes, but also contractors and others who paid the bribes. In addition, DOI focused on deterrence and educating DOB employees through numerous corruption prevention lectures, engaging them in discussion about the corruption around them, the risk of arrest, their legal obligation to report corruption to DOI, and the process for doing so confidentially and with whistleblower protection. DOI also began to inform DOB executives about the honest DOB employees who came forward with reports about bribe offers so the employees could be recognized. The lecture program in combination with these other efforts has yielded dramatic and tangible results since 2002: several years after this concentration on DOB corruption, DOI began to see a steady trend upward of tips from DOB employees about bribes they were offered and turned down, calling DOI instead. Indeed, more than 85 of the 330 arrests DOI has made since 2002 related to DOB matters originated from a record number of tips received from DOB personnel. The DOB Commissioners were full partners in these successful anti-corruption efforts.

LESSONS LEARNED

This program depends on existing staff and their availability given a busy docket to make it successful—a challenge since DOI's relatively small staff of approximately 300, which oversees 300,000-plus employees, is juggling numerous investigations and other tasks while also conducting corruption prevention lectures. However, when DOI committed to this key program, it understood it would need to develop and evolve the program given changing demands and staff. DOI has been able to maintain the program by realizing that successful outcomes are not only based on the number of lectures provided to City agencies but also on lectures that target specific corruption problems and corruption vulnerabilities within City agencies. This approach efficiently utilizes staff time and resources to effectively maintain a high-impact educational campaign, even as staffing has decreased, while also conducting a significant number of investigations.



Best Practice: Anti-Corruption Educational Campaign

As an example, in 2010 when the City instituted a new visible letter grading system for restaurant inspections, DOI experienced an increase in the number of allegations it received from City health inspectors who reported bribe offers by restaurant operators who wanted a good letter grade in the new program. These allegations prompted DOI to conduct undercover operations resulting in a record number of arrests in 2011. The tips from health inspectors are a result of DOI's robust corruption prevention lecture program that specifically focused on presenting lectures to these inspectors who, as a result of the new grading system, were more likely to receive potential bribe offers. At the same time, DOI also reached out to the restaurant industry association to conduct corruption prevention lecture workshops with them for deterrent purposes and to inform restaurant professionals that they too may report to DOI any bribe requests made by City inspectors that take place during restaurant inspections.

TRANSFERABILITY

Once the fundamental lecture is agreed on, it can easily be adapted for specific agencies and specific needs, making this a time and cost-effective outreach model for any integrity agency.

CONTACTS

Rose Gill Hearn
Commissioner
New York City Department of Investigation
80 Maiden Lane – 18th Floor
New York, NY
(212) 825-5900
Communications@doi.nyc.gov

<http://www.nyc.gov/html/doi/html/initiatives/lectures.shtml>

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