

CITY OF NEW YORK  
COMMISSION ON HUMAN RIGHTS

In the Matter of the Complaint of:

THE NEW YORK CITY COMMISSION ON  
HUMAN RIGHTS,

Complainant,

— against —

HEADWAY BEHAVIORAL HEALTH  
MANAGEMENT SERVICES, INC.,

Respondent.

**VERIFIED COMPLAINT**

Complaint No. M-E-Q-24-129653

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The New York City Commission on Human Rights (“Commission”) brings this action against Respondent Headway Behavioral Health Management Services, Inc. (“Headway”) for violating § 8-107(32) of the Administrative Code of the City of New York, the New York City Human Rights Law (“NYCHRL”). As of November 1, 2022, the NYCHRL requires employers in New York City to include a good faith salary range for every job, promotion, and transfer opportunity advertised. The Commission alleges as follows:

**JURISDICTION AND VENUE**

The Commission initiates this Complaint pursuant to NYCHRL § 8-109(c). The effects of the alleged unlawful policies and practices described in this complaint occurred in the City of New York.

**PARTIES**

1. The Commission’s address is 22 Reade Street, New York, NY 10007.
2. Respondent Headway is an employer as defined by NYCHRL § 8-102 and, upon information and belief, employs fifteen (15) or more employees. Respondent’s address for

service of process is Andrew Adams, 401 Broadway, 27th Floor, New York, NY 10013. Its business address is Andrew Adams, 401 Broadway, 27th Floor, New York, NY 10013.

### **FACTS**

3. Respondent maintains a careers page on its website, <https://boards.greenhouse.io/headway> (“Jobs Site”).

4. As of June 12, 2023, the Jobs Site contains forty-two job listings for positions in New York City at Headway.

5. As of June 12, 2023, at least one listing on the Jobs Site for a position in New York City did not display salary ranges: Sr. Clinical Product and Admin Coordinator (<https://boards.greenhouse.io/headway/jobs/4888710004>). Additionally, remote work, which was posted with the statement, "Headway employees work remotely across the US, with the option to work from our NYC HQ," contained work that could be performed in NYC. These positions did not contain salary ranges.

### **CHARGE I**

6. Complainant incorporates and realleges paragraphs 1 through 5 of this Complaint as though fully set forth herein.

7. The Commission charges that Respondent has unlawfully discriminated against job applicants by failing to include a salary range in job listings for positions in New York City currently on its Jobs Site, in violation of § 8-107(32) of the NYCHRL.

### **PRAYER FOR RELIEF**

WHEREFORE, the Commission respectfully requests judgment against Respondent as follows:

- a) Declaring that Respondent's acts, practices, and omissions complained of herein violate the NYCHRL;
- b) Directing Respondent to make all necessary modifications to its policies, practices, and procedures to comply with NYCHRL;
- c) Directing Respondent to train all management, agents, and employees on NYCHRL;
- d) Directing Respondent to engage in affirmative relief, including anti-discrimination training, policy revisions, posting and notice to employees, and monitoring.

Sapna V. Raj, being duly sworn, deposes and says:

I am the Deputy Commissioner of the Law Enforcement Bureau of the New York City Commission on Human Rights, the Complainant herein; I have read the foregoing Complaint and know the content thereof; the same is true of my own knowledge, except as to the matters therein stated on information and belief; and, as to those matters, I believe the same to be true.

Dated: New York, NY  
November 15, 2023

  
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Sapna V. Raj  
Deputy Commissioner  
Law Enforcement Bureau  
New York City Commission on Human Rights  
22 Reade Street, 3rd Floor  
New York, NY 10007