

The City of New York
Department of Investigation

MARGARET GARNETT COMMISSIONER

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nyc.gov/doi

Release #03-2020

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FOR IMMEDIATE RELEASE WEDNESDAY, MARCH 11, 2020

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DOI LAUNCHES PUBLIC PORTAL OF DOI POLICY AND PROCEDURE RECOMMENDATIONS

Margaret Garnett, Commissioner of the New York City Department of Investigation ("DOI"), announced today the launch of a portal on DOI's public website that provides access to the policy and procedure recommendations (PPRs) DOI has issued since 2014. The Policy and Procedure Recommendation Portal will allow users to view DOI's PPRs, to which agencies they were issued, and the status of the PPRs. It also includes a column for City agencies to provide additional information about the implementation of the PPR, which is reviewed and confirmed by DOI. PPRs are formal written recommendations by DOI for changes to policies and procedures that correct operational vulnerabilities identified through DOI investigations. To access DOI PPR Portal please click here.

As a watchdog agency within City government, DOI has the dual role of investigating individual wrongdoing when evidence of corruption or fraud are found, and addressing operational problems and corruption vulnerabilities that are exposed by DOI investigations. The goal: correct and prevent future cases of waste, corruption, or gross mismanagement. DOI works towards that goal by providing an agency with relevant PPRs that are targeted to the specific operational vulnerability exposed in a DOI investigation, and which recommend necessary changes. PPRs help improve the efficiency and effectiveness of City government, defend the City from fraudulent activity, and protect City workers and the public from conditions that could affect health and safety. If it is determined that an agency has not addressed an operational vulnerability, DOI will notify that agency regarding the need to do so and monitor accordingly. Many, but not all, of DOI investigations result in PPRs.

DOI Commissioner Margaret Garnett said, "This public portal is another important step for transparency at DOI, giving the public a way to explore the scores of recommendations DOI issues over any given year and providing a historical window dating back to 2014. Creating this public portal was a herculean task that took more than two years to accomplish: creating a portal that would provide relevant, accurate information about recommendations, double-checking these recommendations to ensure they reflected the most updated status, and providing a valid search engine so users could navigate the portal were among the many issues DOI tackled. For the first time, this portal will demonstrate in a public way the distinct role and impact DOI has in identifying corruption weaknesses and improving City government."

Because of the large numbers of PPRs DOI has issued over the years, and because DOI wanted to ensure accuracy and post the portal as soon as it was able, the PPR Portal includes recommendations issued since 2014, a total of more than 4,500 as of today's launch date. Generally, DOI will update these PPRs on a quarterly basis, in March, June, September and December. DOI may make other updates as warranted outside of those times. Currently, recommendations regarding the New York City Police Department are updated as of DOI's annual 2019 report. As part of the process, DOI informed and educated City agencies about the portal and the relevant PPRs for each agency.

For more background on this initiative, please read the attached statement from the DOI Commissioner, which provides more detail on the Portal; and the attached related PowerPoint, which walks visitors through the highlights of the Portal.

DOI's PPR Portal does not include recommendations by the Special Commissioner of Investigation for the New York City School District ("SCI"). SCI, which has a reporting function to DOI, has launched its own portal, which will include recommendations it has made to DOE. That portal can be found on SCI's website: nycsci.org, and can be accessed through a link on DOI's PPR Portal page. DOI's PPR Portal may include PPRs that were issued to DOE, but only when DOI issued a Citywide PPR that was relevant to DOE's operations.

The following terms and definitions as to a PPR status are essential to navigate the portal and additional information on some of the investigations connected to the PPRs can be found on the public website's <u>DOI Reports</u> page and the <u>DOI News Releases page</u>:

PPR Status Definitions

- <u>Acceptance Status</u> DOI's evaluation of whether the Agency has accepted the PPR. Status may be: Accepted, Rejected, Practice Already in Place; DOI Withdrawn/Suspended; N/A; and/or Pending.
- <u>Implementation Status</u> DOI's evaluation of whether the Agency has implemented an accepted PPR. Status may be: Yes, No, Practice Already in Place; DOI Withdrawn/Suspended; N/A; and/or Pending.
- <u>Additional Agency Comment</u> Agencies are able to provide additional clarification to explain DOI's
 evaluation of the PPR status, such as whether the PPR is partially implemented or is pending additional
 resources in order to fully implement, etc.
- <u>Citywide PPR</u> Following an investigation for a specific issue at one or more City agencies, in order to prevent fraud at any City agency that may have a similar risk of fraud, DOI issued the same PPRs to numerous City agencies.
- Not Applicable Typically used for PPRs that have been issued Citywide but which are not applicable to a particular agency.
- <u>Practice Already in Place</u> Typically used for PPRs that have been issued Citywide but where the agency was already in compliance with the recommendation.
- <u>DOI Withdrawn/Suspended</u> DOI is working with several City agencies to provide additional guidance on some Citywide PPRs. No response is required from agencies on these PPRs until such guidance has been provided.

DOI is one of the oldest law-enforcement agencies in the country and New York City's corruption watchdog. Investigations may involve any agency, officer, elected official or employee of the City, as well as those who do business with or receive benefits from the City. DOI's strategy attacks corruption comprehensively through systemic investigations that lead to high-impact arrests, preventive internal controls and operational reforms that improve the way the City runs.



The City of New York Department of Investigation

MARGARET GARNETT COMMISSIONER

180 MAIDEN LANE NEW YORK, NY 10038 212-825-5900 Release #04-2020 nyc.gov/doi

FOR IMMEDIATE RELEASE WEDNESDAY, MARCH 11, 2020

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STATEMENT FROM DOI COMMISSIONER MARGARET GARNETT ON LAUNCH OF PUBLIC POLICY AND PROCEDURE RECOMMENDATIONS PORTAL

Today is very exciting! It is the culmination of more than two years of discussion and work on a database that, beginning today, will provide the first comprehensive public view into the thousands of policy and procedure recommendations (PPRs) that DOI has issued since 2014.

Policy and procedure recommendations, which we commonly refer to as PPRs, are a core part of DOI's anti-corruption mission. They are part of the dual role we have in investigating individual wrongdoing when there is evidence of corruption or fraud, and also addressing operational problems and corruption vulnerabilities that are exposed by the investigations we do. The goal of our recommendations is to correct these weaknesses and prevent similar corruption from occurring in the future, as well as help improve the efficiency and effectiveness of City government.

This effort began with the goal of creating an internal tool that could better track PPRs and enable DOI to improve our follow-up with City agencies. As a complement to that effort, over the past year we have also worked towards building a publicly accessible Portal to this dataset. Our primary goal has been to ensure that public information on these recommendations is both accurate and fair. The breadth of that task, as well as the need to unveil the Portal this year, counseled in favor of including a finite period of historical PPRs. Going back to 2014 allowed DOI to meet those goals as well as include all PPRs issued during the current mayoral administration.

To give you a sense of that undertaking, the public Portal currently holds more than 4,500 policy and procedure recommendations. Our staff has double-checked each PPR to make sure it was properly issued to the relevant City agency or entity, that the City agency or entity was aware of it, that DOI has the correct status for the PPR, and that up-to-date information is reflected in the database. Part of that effort has included communication with every City agency to give them an opportunity to confirm the accuracy of the PPRs in our records and ensure that we have the latest information on the implementation status of those recommendations. Going forward, updates to the data in the public Portal will occur at least quarterly and on an as-needed basis.

DOI's efforts in developing this database are consistent with City Council's recent legislation on the issue, which has now codified the need for public access to DOI's PPRs. I appreciate that City Council was open to hearing DOI's view on the proposed legislation during a hearing in November 2019. The Portal we are unveiling today brings that legislation to life, greatly enhancing public visibility into DOI's work and the workings of City government.

As I mentioned at the outset, PPRs are a vital part of DOI's mission and are where our work has its greatest impact on City government. Beginning today, if you access the public Portal, you will find the following information about our PPRs:

- the agency or entity to whom the PPR was issued,
- the date the PPRs was issued,
- the text of the PPR as issued,
- whether the PPR was accepted,
- whether the PPR has been implemented,
- the date the PPR was implemented, and
- a field for additional information about implementation at the agency.

The Council's legislation also applies to recommendations issued by the Special Commissioner of Investigation, which has oversight of the Department of Education (DOE). SCI's recommendations to DOE, dating from the start of 2019, can be found on SCI's website, which is accessible directly or through a link on DOI's website. DOI's PPR Portal does include a handful of PPRs that were issued to DOE, but that situation would typically only arise when DOI issues a Citywide PPR that was relevant to DOE's operations – for example, on fleet usage policies.

Since Fiscal Year 2013, DOI has disclosed in the Mayor's Management Report various aggregate PPR numbers. We recently expanded that reporting to include the aggregate numbers on both acceptance and implementation. But this Portal represents the first iteration of a comprehensive, public catalog of DOI's PPRs, providing greater visibility into New York City government and how DOI is working to strengthen it.

One final thought before you dive into the Portal itself: in my view, the strength and value of the Portal is its focus on the *substance* of DOI's recommendations. The work that agencies do varies tremendously, across the huge range of things the City does every day. Just like agencies, all PPRs are not created equally, either. Some, for instance, may deal with relatively minor issues, while others may address big systemic changes, which may take significant time and resources for the agency to change. DOI does not view the Portal as a way to compare agencies to each other, because reducing the complexity of our oversight work to a numerical value would not present an accurate or fair picture of DOI's work or the response of City agencies to that work.

This Portal is an extension of DOI's commitment to the facts, to transparency, and to making meaningful improvements in City government. It is an extension of our core mission, and I'm so proud to make it publicly available today.

DOI is one of the oldest law-enforcement agencies in the country and New York City's corruption watchdog. Investigations may involve any agency, officer, elected official or employee of the City, as well as those who do business with or receive benefits from the City. DOI's strategy attacks corruption comprehensively through systemic investigations that lead to high-impact arrests, preventive internal controls and operational reforms that improve the way the City runs.

DOI's press releases can also be found at twitter.com/NYC_DOI
Bribery and Corruption are a Trap. Don't Get Caught Up. Report It at 212-3-NYC-DOI.

Department of Investigation

Policy and Procedure Recommendations Portal



March 11, 2020

PPR Portal Purpose & Scope

Purpose:

- DOI issues Policy and Procedure Recommendations (PPRs) to correct and prevent corruption, fraud, and other operational weaknesses DOI identifies during its investigations.
- PPRs are a core part of DOI's mission; part of our dual role in investigating wrongdoing and addressing operational problems and corruption vulnerabilities exposed by DOI investigations.
- This is the first publicly accessible database providing a window into a cornerstone of DOI's anti-corruption work.

Scope:

- Over 4,500 PPRs issued to all City agencies since 2014.
- PPR status, including Pending, Accepted, Implemented, and Rejected.
- DOI will update the website at least quarterly in March, June, September, and December of each year.



City Council Legislation

- New City Council legislation aligns with DOI's efforts to provide the public with greater insight and data on DOI's PPRs.
- The new law was passed on February 27, 2020, and goes into effect 30 days after that date. It mandates that DOI publicly post all PPRs issued to City agencies and agency responses.
- DOI is pleased to unveil the PPR Portal four months prior to the due date of July 1, 2020, as noted in the law.



PPR Overview

- PPRs that are publicly posted have been edited to remove any confidential information (ex: an employee's name, if the underlying allegations were unsubstantiated.)
- Whenever possible, DOI discusses the PPR with the relevant agency before it is issued to determine whether the PPR is feasible, affordable, applicable, etc.
- After a PPR is issued, City agencies are generally given 30 days to respond, depending on the complexity of the PPR. City agencies are not required to report implementation status within this timeframe, only whether they "accept" the PPR and "agree to implement it" in the future.
 - PPRs will not be publicly posted during that response period, in order to give City agencies an opportunity to properly assess the recommendation and respond to DOI.



PPR Portal Overview

THE INFORMATION THAT WILL BE PUBLICLY AVAILABLE

- Agency: Agency to which the PPR was issued.
- Date Issued: The date the PPR was issued.
- Recommendation: The text of the PPR.
- Acceptance Status: DOI's evaluation of whether the Agency has accepted the PPR. Status may be: Accepted; Rejected; Practice Already in Place; DOI Withdrawn/Suspended; N/A (Not Applicable); and/or Pending.
- <u>Implementation Status</u>: DOI's evaluation of whether the Agency has implemented an accepted PPR. Status may be: *Yes, No, Practice Already in Place; DOI Withdrawn/Suspended; N/A*; and/or *Pending*.
- Date Implemented: The date the PPR was Implemented.
- Additional Agency Comment: Agencies are able to provide additional clarification to explain DOI's evaluation of the PPR status, such as whether the PPR is partially implemented or is pending additional resources in order to fully implement, etc.

PPR Portal Overview

AGENCY REPORTED STATUS

City agencies have the option to provide additional information about the implementation status by selecting one of the following drop-downs:

- Not applicable
- Agency self-reported practice already in place
- Partially accepted
- Partially implemented
- Partially accepted and implemented
- Implementation in progress
- Alternate measures implemented
- Implemented by Corrective Action Plan prior to formal response

- Pending budget approval
- Barred by current union contract
- Union-related rejection
- Recommendation no longer applicable
- Awaiting additional resources
- Contingent on contract
- Pending action by another government agency
- Agency chose not to respond



PPR Portal Overview

CITYWIDE PPRS & STATUS

Citywide PPR:

Following an investigation for a specific issue at one or more City agencies, DOI may issue the same PPR(s) to numerous relevant City agencies. This is done in order to prevent fraud at all City agencies that may have similar risks or policies.

Possible Acceptance and Implementation Status includes:

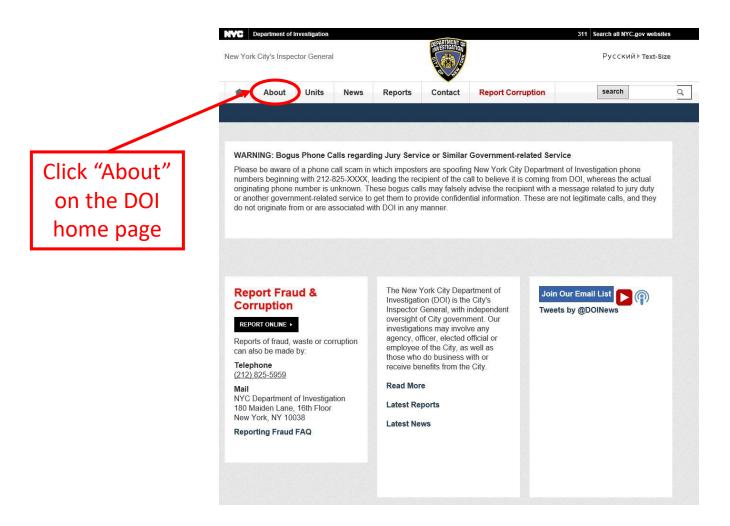
- **Not Applicable**: Typically used for PPRs that have been issued Citywide but which are not applicable to a particular agency.
- <u>Practice Already in Place</u>: Typically used for PPRs that have been issued Citywide but where the agency was already in compliance with the recommendation.
- <u>DOI Withdrawn/Suspended</u>: Typically used for PPRs that have been issued Citywide. DOI is working with several City agencies to provide additional guidance on some Citywide PPRs. No response is required from agencies on these PPRs until such guidance has been provided.



PPR Portal



DOI public website: https://www1.nyc.gov/site/doi/index.page





Message from the Commissioner

Executive Staff

Agency Org Chart

Mission and History

Policy and Procedure Recommendations Portal

Freedom of Information

Integrity Monitor Program

Timeline

Law

Memoranda of Understanding

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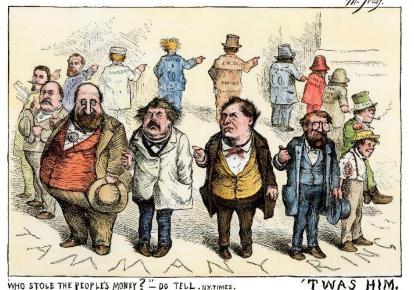


Click on "Policy and Procedure Recommendations Portal"

About DOI

DOI is one of the oldest law-enforcement agencies in the country, formed in the 1870s following a scandal in which the corrupt William "Boss" Tweed and his unscrupulous cronies skimmed millions from the City coffers. Investigations may involve any agency, officer, elected official or employee of the City, as well as those who do business with or receive benefits from the City. As New York City's Inspector General, DOI's strategy attacks corruption comprehensively through systemic investigations that lead to high-impact arrests, preventive controls and operational reforms that improve the way the City runs.

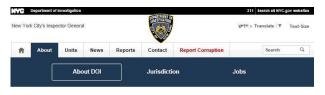






To visit DOI's PPR Portal,

Click Here





DOI Policy and Procedure Recommendations Portal

Welcome to the New York City Department of Investigation's Policy and Procedure Recommendations (PPR) Portal, which provides the public with a greater understanding of the recommendations DOI issues to City agencies and entities. PPRs are formal written recommendations to City agencies that correct policy, procedural and operational vulnerabilities identified through DOI investigations. These PPRs are part of DOI's distinct approach to attacking corruption: through prevention, education, arrests, public reports, and reforms that tighten internal controls and prevent fraud and corruption from re-occurring. PPRs help improve the efficiency and effectiveness of City government, defend the City from fraudulent activity, and protect City workers and the public from conditions that could affect health and safety. They are good government in

As a watchdog agency within City government, DOI has the dual role of investigating individual wrongdoing when we find evidence of corruption or fraud, but also addressing operational problems and corruption vulnerabilities that are exposed by our investigations. Our goal is to correct and prevent future cases of waste, corruption, or gross mismanagement. We work towards that goal by providing an agency with relevant PPRs that are targeted to the specific operational vulnerability exposed in our investigation, and which recommend necessary changes. If we determine an agency has not addressed an operational vulnerability, DOI will notify them regarding the need to do so and monitor accordingly. Many, but not all, of DOI investigations result in PPRs.

DOI's effort to officially track its PPRs began in 2007 and evolved over the years to the portal that you can now access on this website, which allows you to view PPRs by individual agency.

Because of the large number of PPRs that DOI has issued over the years, and in order to ensure accuracy and fimeliness in establishing this portal, DOI included recommendations issued since 2014, a total of more than 4.500 PPRs as of the launch date for the portal in March 2020. Generally, DOI updates these PPRs on a quarterly basis, in March, June, September and December. DOI may make other updates as warranted outside of those times. Currently recommendations regarding the New York City Police Department are updated as of DOI's annual

The PPR portal includes DOI's evaluation of the agencies' status of the PPRs after they are issued to the agency, including acceptance and implementation. The Portal also includes a column for the agencies to select further comments from a list of options, in order to provide additional information that may help explain DOI's evaluation of the PPR status

The following terms and definitions will be helpful as you navigate through the portal:

· Acceptance Status - DOI's evaluation of whether the Agency has accepted the PPR. Status may be: Accepted, Rejected, Practice Already in Place; DOI Withdrawn/Suspended; N/A; and/or

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· Practice Already in Place - Typically used for PPRs that have been issued Citywide but where the agency was already in compliance with the recommendation.

* DOI Withdrawn/Suspended - DOI is working with several City agencies to provide additional guidance on some Citywide PPRs. No response is required from agencies on these PPRs until such quidance has been provided.

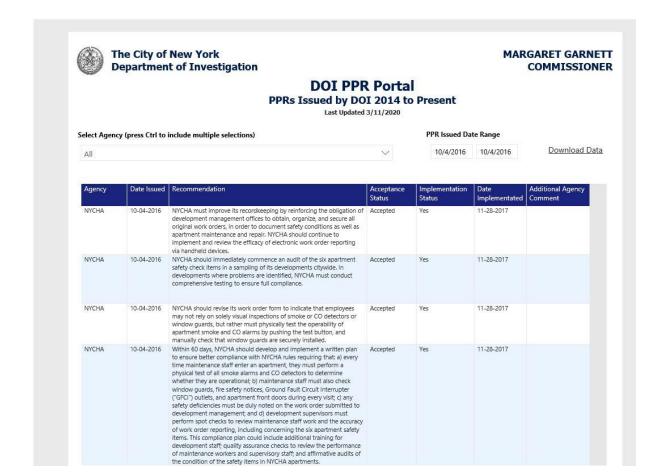
Please go to DOI reports and DOI News Releases for additional information on the investigations

The Special Commissioner of Investigation (SCI) for the New York City School District maintains its own policy and procedure recommendation data, which is posted on its website. To visit SCI's website, click here.

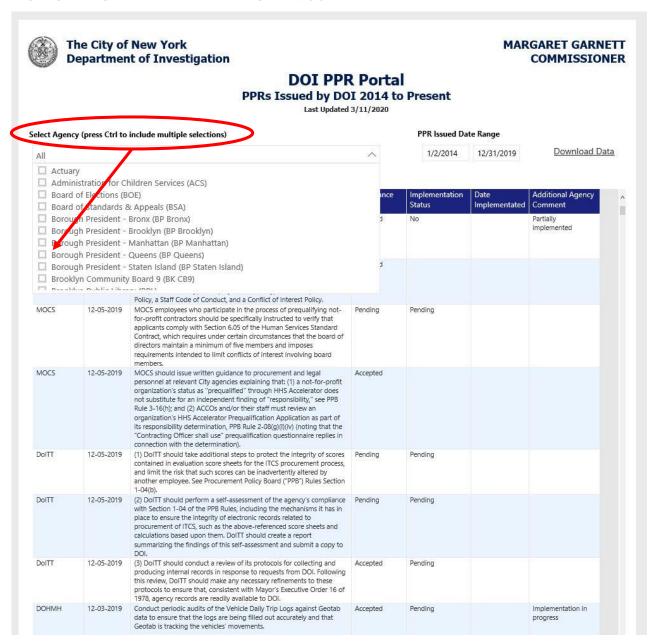




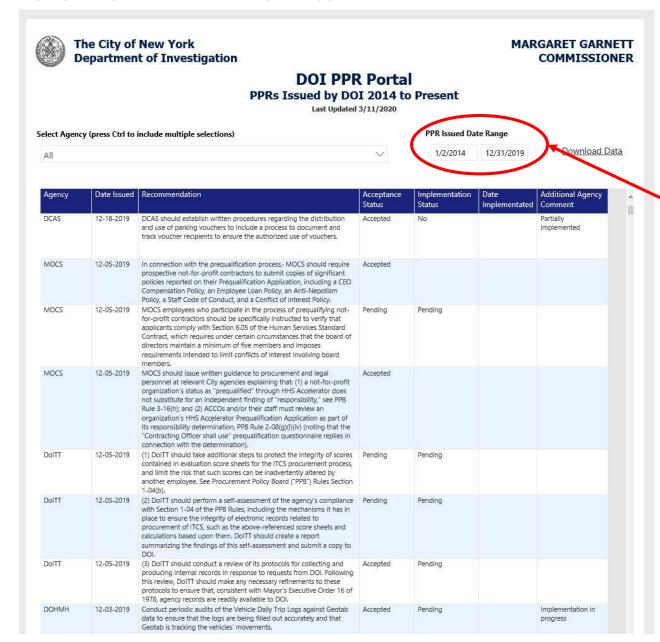








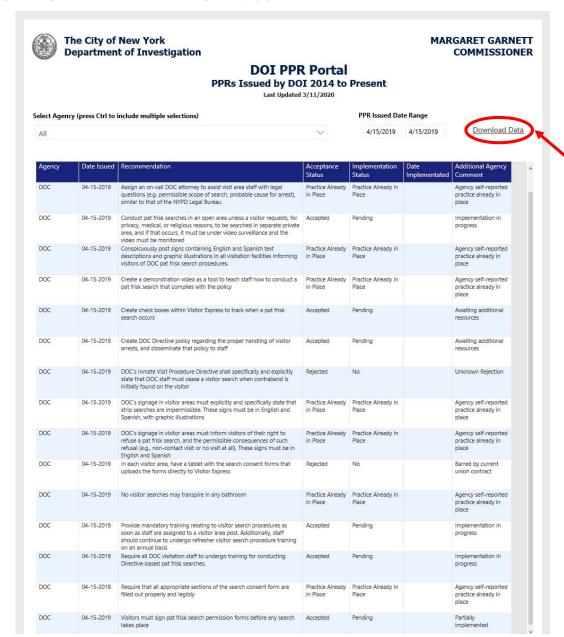




Select the Date Range of when PPR was issued







Click on
"Download
Data" to
export PPR
data to a
spreadsheet

