



Equal Employment Practices Commission's Auditing Procedures

What questions did the audit look at?

- ▶ Did the Equal Employment Practices Commission (EEPC) implement recommendations made in the initial audit?
- ▶ Is EEPC meeting its New York City Charter requirement to audit and evaluate equal employment practices of City agencies?

Why does it matter for New Yorkers?

In 2020, the New York City Comptroller audited EEPC to determine whether EEPC was fulfilling its Charter mandate to regularly audit and evaluate City agencies for compliance with equal employment opportunity laws and best practices. The follow-up audit found that EEPC has implemented all three recommendations made in the initial audit, despite its stated disagreement with two and non-response to the third.

EEPC is required to audit all City agencies on a four-year cycle. For the 2018–2021 cycle, EEPC met its Charter mandate; EEPC was on track to meet its mandate for the current cycle.

However, the follow-up audit also found other compliance issues: EEPC's website does not reflect up-to-date information concerning the resolution of Final Determinations (FD) for the most recently completed audits, and EEPC lacks formal policies and procedures governing certain auditing practices.

When EEPC does not fulfill its obligations, agencies may not be held accountable for discriminatory practices or gaps in their policies. This increases the risk of unequal treatment and costly litigation for the City. Regular audits and transparent reporting promote equity and build public trust in government operations.

What changes did the agency commit to make following the audit?

- ▶ EEPC stated that it will establish written policies and procedures regarding the opening and completion of City audits.
- ▶ EEPC stated that it will update its website and ensure that information posted is current.
- ▶ EEPC stated that all policy changes are documented in writing and disseminated to agency staff.

FOLLOW-UP AUDIT FINDINGS



EEPC implemented all three recommendations from the prior audit.



EEPC met its Charter mandate for the most recent cycle, and is on track to meet its mandate for the current one.



EEPC's website did not contain up-to-date information.



EEPC lacked formal written policies for audit planning and execution.

Initial Audit Recommendations		Status
1	The EEPC should strengthen its oversight procedures in the planning of audits to ensure that it complies with its City Charter mandate of auditing and evaluating each City agency every four years.	IMPLEMENTED
2	The EEPC should seek clarification from the New York City Law Department of the requirements applicable to the EEPC's auditing and evaluating mandate with regard to the opening and completion of City agency audits every four years.	IMPLEMENTED
3	The EEPC should accurately state in its Annual Reports whether it has met the Charter mandate in auditing and evaluating each City agency's employment practices at least once every four years.	IMPLEMENTED

Follow-up Audit Recommendations		Agency Response
1	Establish written procedures regarding the opening and completion of City agency audits in line with the Law Department's opinion.	AGREED
2	Continue its efforts to update its website and ensure that, moving forward, updates are made in a timely manner.	AGREED
3	Ensure that all policy changes are documented in writing and disseminated to the appropriate agency staff.	AGREED

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