



AUDIT AT A GLANCE

Department of Investigation's Management of Background Investigations

What questions did the audit look at?

- ▶ Did the New York City Department of Investigation (DOI) conduct background investigations for City employees in a timely and effective manner?

Why does it matter for New Yorkers?

Background investigations are a crucial safeguard to ensure that individuals entrusted with government power are suitable and do not present conflicts of interest or other vulnerabilities. When the City hires employees, DOI is generally the agency responsible for conducting these checks. At the start of the audit's scope period, DOI had a backlog of over 2,700 cases; since then, it has substantially reduced this backlog. Nevertheless, DOI's management of its caseload could be improved.

Some old cases remained unresolved for years, with DOI taking on average 5.7 years to close them; some remained open for up to eight years. In fact, 40% of cases were administratively closed because the subjects were no longer employed by the City. DOI does not make recommendations regarding the suitability of appointments based on background investigations, and it does not track hiring decisions made by agencies, even when adverse information is identified.

DOI has no formal written timeframes for completing certain investigations, and the agency does not ensure that agencies are submitting all required employees for background investigations on time. Additionally, the audit found that 60% of sampled cases were missing required documentation or lacked evidence showing that all required investigative steps were taken by DOI.

Finally, DOI does not consistently ensure that subject fingerprints are removed from files once investigations are closed, contrary to privacy requirements laid out by the New York State Division of Criminal Justice Services.

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

- ▶ DOI agreed to strengthen its background investigation process by tracking appointment and submission dates to ensure agencies submit background packages on time, issuing updated guidance to agency personnel every two years, and improving its documentation practices.

AUDIT FINDINGS



DOI substantially reduced its backlog of 2,720 open background investigations.



On average, it took DOI 5.7 years to close backlogged investigations; some took up to eight years.



40% of backlogged investigations were closed because the employee was no longer employed by the City.



60% of sampled files were missing documentation or evidence of completed steps.



DOI does not make recommendations regarding suitability of candidate appointments.



Audit Recommendations		Agency Response
1	Assign administrative staff to review the Payroll Management System for the remaining backlog cases to determine whether individuals are still employed by the City and, if not, administratively close their cases.	DISAGREED
2	Consider making recommendations or providing some other kind of guidance to agencies regarding the impact of certain types of adverse information on the suitability of appointments.	DISAGREED
3	Consider tracking whether candidates are retained or terminated based on background investigations that identify adverse information.	DISAGREED
4	Require the use of checklists and review forms to ensure all applicable investigation steps are conducted and documented.	AGREED
5	Establish written timeframes for completing expedited, priority, and backlog investigations.	DISAGREED
6	Report separately on completion timelines for routine, expedited, priority, and backlog investigations in the Mayor's Management Report to provide a complete and accurate picture of DOI's performance.	DISAGREED
7	Consider creating additional closing types or creating levels for the "Other" category, such as Level 1 for less serious findings and Level 3 for the most serious.	DISAGREED
8	Ensure that fingerprints and results are removed from background investigation files within required timeframes. Establish monitoring activities on a periodic sample basis to ensure they are removed and destroyed.	AGREED
9	Conduct periodic reviews to ensure agencies are submitting all required candidates for background investigations.	DISAGREED
10	Consider tracking appointment dates to determine whether agencies are submitting applications for background investigations within required timeframes.	AGREED
11	Issue updated memos or guidance to City agencies at least every two years to help ensure they are aware of their responsibilities for submitting background investigation packages.	AGREED
12	Ensure that Kaseware has adequate documentation, including a data dictionary.	DISAGREED

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