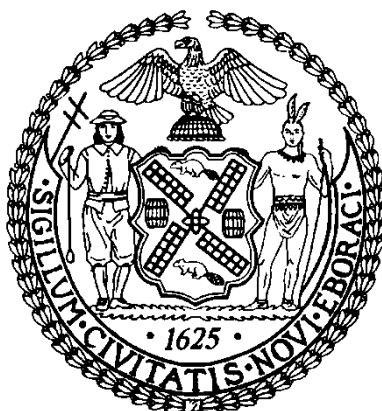


**CITY OF NEW YORK
OFFICE OF THE COMPTROLLER**

**John C. Liu
COMPTROLLER**

MANAGEMENT AUDIT

**Tina Kim
Deputy Comptroller for Audit**



**Follow-up Audit Report on the Compliance of the
Equal Employment Practices Commission with Its
Charter Mandate to Audit City Agencies**

MJ11-123F

October 26, 2011

<http://comptroller.nyc.gov>



THE CITY OF NEW YORK
OFFICE OF THE COMPTROLLER
1 CENTRE STREET
NEW YORK, N.Y. 10007-2341

John C. Liu
COMPTROLLER

October 26, 2011

Dear Residents of the City of New York:

My office has audited the Equal Employment Practices Commission (EEPC) to determine whether it implemented two recommendations made in a previous audit report, entitled "*Audit Report on the Compliance of the Equal Employment Practices Commission with its Charter Mandate to Audit City Agencies*" (#MD09-057A), issued May 29, 2009. We conduct follow-up audits of City agencies' as a means of ensuring that agencies take corrective action to address weaknesses and deficiencies disclosed during our audits.

The audit found that EEPC implemented the two recommendations made in the earlier audit. However, due to EEPC's budgetary and staffing constraints, the audit concluded that it is likely that EEPC will again fall short of meeting its mandate of auditing all City agencies under its jurisdiction within the current four-year audit period, ending December 31, 2012.

To address these weaknesses, the audit made three recommendations, including that EEPC should ensure that agencies not audited within the previous (2005–2008) and current (2009–2012) audit periods are the next agencies scheduled to be audited.

The results of the audit have been discussed with EEPC officials, and their comments have been considered in preparing this report. Their complete written response is attached to this report.

If you have any questions concerning this report, please email my Audit Bureau at audit@comptroller.nyc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "John C. Liu".

John C. Liu

Table of Contents

AUDIT REPORT IN BRIEF	1
Audit Findings and Conclusions.....	1
Audit Recommendations.....	1
EEPC Response	1
INTRODUCTION.....	2
Background.....	2
Objective.....	2
Scope and Methodology Statement	2
Discussion of Audit Results.....	3
RESULTS OF FOLLOW-UP AUDIT	4
RECOMMENDATIONS.....	7
DETAILED SCOPE AND METHODOLOGY.....	9
ADDENDUM Equal Employment Practices Commission Response	

*The City of New York
Office of the Comptroller
Management Audit*

**Follow-up Audit Report on the Compliance of the
Equal Employment Practices Commission with Its
Charter Mandate to Audit City Agencies**

MJ11-123F

AUDIT REPORT IN BRIEF

The Equal Employment Practices Commission (EEPC) is responsible for monitoring City agencies' compliance with the City's Equal Employment Opportunity (EEO) policy as well as related federal, state and local laws. Accordingly, EEPC is mandated to audit and evaluate the equal-employment practices and procedures of each agency at least once every four years and whenever requested by the Civil Service Commission or the Human Rights Commission.

This follow-up audit determined whether EEPC implemented two recommendations made in a previous audit report, entitled "*Audit Report on the Compliance of the Equal Employment Practices Commission with its Charter Mandate to Audit City Agencies*" (#MD09-057A), issued May 29, 2009.

Audit Findings and Conclusions

EEPC implemented the two recommendations made in the referenced previous audit. However, due to EEPC's budgetary and staffing constraints, the audit concluded that it is likely that EEPC will again fall short of meeting its mandate of auditing all City agencies under its jurisdiction within the current four-year audit period, ending December 31, 2012.

Audit Recommendations

The audit made three recommendations, including that EEPC should ensure that agencies not audited within the previous (2005–2008) and current (2009-2012) audit periods are the next agencies scheduled to be audited. In particular, the Mayor's Office, City Council, and Law Department should be the first audits assigned and initiated as current engagements are completed.

EEPC Response

We received a written response from EEPC officials on September 28, 2011. In their response, EEPC officials generally agreed with all three of the audit's recommendations.

INTRODUCTION

Background

The Equal Employment Practices Commission (EEPC) is an independent City agency empowered by Chapter 36 of the New York City Charter to audit and monitor the compliance of all City agencies¹ with the City's Equal Employment Opportunity (EEO) policy as well as related federal, state and local laws to ensure that they maintain an effective, affirmative equal-employment program for protected groups (i.e., minority group members and women) who are employed by or who seek employment with New York City government.

EEPC must audit and evaluate the employment practices and procedures of each City agency at least once every four years and whenever requested by the Civil Service Commission or the Human Rights Commission. Through its audits, EEPC makes recommendations to assist City agencies implement and maintain anti-discriminatory employment practices, procedures for investigating discrimination complaints, and programs to educate employees about unlawful discriminatory practices. EEPC is also responsible for monitoring agencies' compliance in implementing EEPC's audit recommendations.

Objective

The objective of this follow-up audit was to determine whether EEPC implemented the two recommendations made in the previous audit report, entitled "*Audit Report on the Compliance of the Equal Employment Practices Commission with its Charter Mandate to Audit City Agencies*" (#MD09-057A), issued May 29, 2009.

Scope and Methodology Statement

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. This audit was conducted in accordance with the audit responsibilities of the City Comptroller as set forth in Chapter 5, §93, of the New York City Charter.

The audit scope was Calendar Years 2009 through 2011. Please refer to the "Detailed Scope and Methodology" section at the end of this report for the specific procedures and tests that were conducted.

¹ Chapter 36, § 831 of the City Charter defines a city agency under EEPC's jurisdiction as a government entity funded in whole or in part by the city, or which has a majority of board members appointed by the Mayor, or who serve by virtue of being City officers.

Discussion of Audit Results

The matters covered in this report were discussed with EEPC officials during and at the conclusion of this audit. A preliminary draft report was sent to EEPC officials and discussed at an exit conference held on September 7, 2011. We submitted a draft report to EEPC officials with a request for comments. We received a written response from EEPC officials on September 28, 2011. In their response, EEPC officials generally agreed with all three of the audit's recommendations.

The full text of the EEPC response is included as an addendum to this report.

RESULTS OF FOLLOW-UP AUDIT

Previous Finding: “EEPC Is Not Meeting Its Charter Mandate to Audit City Agencies”

The previous audit found that for the four-year audit period of Calendar Years 2005 through 2008, “EEPC had audited only 102 (65%) of the 156 agencies required to be audited by December 31, 2008. There were an additional 13 agencies for which audits were initiated but not completed by December 31, 2008. Although EEPC is not meeting its mandate, it has increased the number of audits completed per year.” In addition, the audit noted that “EEPC has requested funds from the City’s Office of Management and Budget (OMB) to hire the additional staff necessary to meet its City Charter mandate, to no avail.”

Previous Recommendation #1: “Continue to request funds from the Mayor’s Office for the additional staff members needed to meet the Charter mandate.”

Previous EEPC Response: “This Commission will continue to request from the Mayor and the City Council, the funds needed to hire sufficient staff to address our City Charter mandate.”

Current Status: IMPLEMENTED

Since the previous audit, EEPC has continued to seek additional resources and to request additional funds from the Mayor’s Office and City Council to enable the agency to hire three additional audit staff needed to meet its Charter mandate of auditing every agency once every four years.

Specifically, we found that on May 11, 2009, EEPC submitted a formal request to the Chair of the City Council’s Civil Rights Committee (Committee) asking for a budget enhancement of \$110,000 for Fiscal Year 2010 for the purpose of hiring additional three audit staff. On March 22, 2010, EEPC’s officials testified before the Committee, during which they requested additional funding to hire two additional staff auditors. On April 8, 2010, EEPC corresponded with the Director of the Office of Management and Budget (OMB) requesting that EEPC be waived from the City’s directive to reduce its permanent head count. Further, on March 25, 2011, EEPC again testified before the Committee requesting an enhancement of \$116,500 to EEPC’s 2012 budget to hire three additional auditors.

Despite EEPC’s efforts, its requests for additional funding have been unsuccessful. In fact, EEPC’s budget was reduced by \$22,000 to \$744,000 in Fiscal Year 2011 from \$766,000 in Fiscal Year 2009. However, for both Fiscal Years 2011 and 2012, EEPC was waived from a proposed headcount reduction. Consequently, its headcount of eight full-time positions remained constant. Further, for Fiscal 2012, City Council recommended no changes to EEPC’s budget from its Fiscal 2011 adopted budget of \$744,000, noting that there were “limited opportunities for budgetary cuts.”

In its efforts to identify additional funding, on January 29, 2010, EEPC corresponded with the Commissioner of the Department of Citywide Administrative Services (DCAS) requesting that EEPC be relocated from its current office space in a privately-owned building to City-owned office space. EEPC officials stated that the re-location of its office space would eliminate its annual lease expense of approximately \$180,000. In its April 8, 2010, correspondence to OMB (discussed above), EEPC also requested that OMB approve the reallocation of the savings realized from EEPC's proposed relocation to its personal services budget to enable it to hire additional staff. According to EEPC's Executive Director, DCAS has located City-owned office space for EEPC, which it expects to move to by the end of 2011. He also stated that OMB, however, is withholding its approval for the proposed alternative use of estimated savings until EEPC is actually relocated.

Our review of EEPC officials' testimony before City Council and budget-related publications issued by the City Council in response to the Mayor's Budget for Fiscal Years 2009–2012 disclosed that in early 2010, the City Council's Civil Rights Committee requested that EEPC “explore opportunities to draw down State and/or federal funding, as well as private funding,” and to provide an update on EEPC's “efforts to diversify funding streams.”²

As follow-up, we asked EEPC officials to provide us with information about EEPC's efforts to seek funding from other than City sources. No such information was provided. Instead, we reviewed the transcript of EEPC's testimony before the Committee on March 25, 2011, during which EEPC officials indicated that the topic of seeking additional funding had been discussed by the Commissioners; however, no efforts had been made by the agency to research additional funding opportunities from federal and state government or private sources.

Previous Recommendation #2: “Ensure that agencies not audited within the last four years are the next agencies scheduled to be audited.”

Previous EEPC Response: “We will also continue to identify and include agencies not audited in the last four years in our annual plan.”

CURRENT STATUS: IMPLEMENTED

Of the 156 City agencies included in EEPC's list of covered agencies as of December 31, 2008, there were 41 agencies that EEPC had not audited. According to EEPC officials, only 28 of those 41 unaudited agencies actually had to be scheduled for an audit in the current four-year audit period (2009–2012) because 13 of the 41 “agencies” were taken off of EEPC's list. The 13 agencies include:

- Ten Department of Education (DOE) Division/Regional Offices. (Given DOE's reorganizations, EEPC decided to no longer target DOE's individual units for audit but rather to do so as one consolidated entity. Therefore, on EEPC's current list DOE's Central Office along with all divisions/regional offices are listed as one agency.)

² “City Council's Response to the Mayor's Preliminary Budget for Fiscal Year 2011,” dated April 8, 2010, p. 56.

- The School Construction Authority, the New York City Water Board, and the New York City Water Finance Authority. (According to EEPC officials, despite EEPC's efforts to audit these entities, they are outside of EEPC's audit authority based on New York City Law Department's Opinion #11-90. Therefore, EEPC decided to remove them from its list of covered agencies.)

Of the adjusted 28 agencies that remained unaudited on December 31, 2008, we found that EEPC had scheduled and completed audits for all but one agency in the current (2009-2012) audit period. Specifically, we found that 19 agency audits were completed in 2009, five audits were completed in 2010, three audits were completed in 2011, and one other agency, the New York City Law Department, remained unaudited. This is of concern since the last audit conducted of the Law Department by EEPC was completed in 2004. We found that although EEPC had included the Law Department on its audit plans for calendar years 2009 through 2011, EEPC had not initiated or completed an audit of that agency in the last two audit periods (2005–2008 and 2009–2012).

Of the 13 agencies for which audits were initiated but not completed by December 31, 2008 (noted in the previous audit), we found that EEPC completed 10 in the current audit period. The three remaining “in progress” audits included those for the Mayor's Office, the City Council, and the Department of Design and Construction (DDC). According to EEPC records, the audits of the Mayor's Office and City Council that were “in progress” on December 31, 2008, were never completed, despite being initiated on October 2, 2006 (per the date of the audit engagement letters). According to the Executive Director, these audits had been “postponed,” yet we noted that EEPC continued to indicate these audits as “in progress” on its audit plans for calendar years 2009-2011. Regarding the audit of DDC listed as “in progress” as of December 31, 2008, there was no evidence (report of final determination) that EEPC completed the audit in 2009, 2010 or 2011 (through June 30). Rather, we noted that EEPC issued a new engagement letter on March 31, 2010, and listed DDC as “in progress” in its 2011 audit plan, with a notation that it was last audited in 2004.

As of June 30, 2011, there were 140 agencies included in EEPC's list of covered agencies required to be audited in the current audit period. These agencies consist of the 156 agencies listed as of December 31, 2008, less 16 agencies removed, including 13 agencies previously discussed and three others: (1) New York City Off-Track Betting, which was taken over by New York State in mid-2008; (2) the Department of Juvenile Justice, which merged with the Administration for Children's Services in December 2010; and (3) the Department of Records and Information Services, which merged with DCAS in early to mid-2011.

According to relevant EEPC records, as of June 30, 2011, of the 140 agencies to be audited in the current audit period, 40 (29 percent) agency audits were completed (27 in 2009, 12 in 2010 and one in 2011), 30 (21 percent) agency audits were in progress (including those for the Mayor's Office and City Council ongoing since 2006), and 70 (50 percent) agencies were not yet audited.

EEPC's Executive Director stated that since our previous audit, the agency has undertaken efforts to improve its own audit productivity. Specifically, in 2010, EEPC modified its audit procedures to include the use of e-mail to conduct audit interviews of City agencies' EEO personnel. In addition, EEPC adopted the use of electronic surveys as part of its audit procedures. Further, EEPC officials noted that since EEPC has completed at least one

comprehensive audit of almost every City agency, it has expanded the scope of its desk audits to include agencies “with fewer than 150 employees” from those “with fewer than 15 employees.”

EEPC estimated that, on average, a desk audit could take up to two months whereas a full-scale (or comprehensive) audit could take up to four months (or longer) to complete, based on the given agency.³ Therefore, by expanding the number of desk audits performed, EEPC may be better able to complete a larger number of audits each year. However, given that as of June 30, 2011, EEPC still was “developing its desk audit protocols” for many of the applicable agencies and 70 agencies remained yet unscheduled for an audit, the likelihood is that EEPC will again fall short of meeting its mandate of auditing all City agencies under its jurisdiction within the current four-year audit period, ending December 31, 2012.

If EEPC remains unable to meet its mandate, there is no assurance that all City agencies under its jurisdiction are complying with the City’s EEO policy and maintaining effective, affirmative equal-employment programs for protected groups who are employed by or who seek employment with New York City government.

RECOMMENDATIONS

To address the issues that still exist, we recommend that EEPC should:

1. Continue to advocate for greater resources from City Council and the Mayor’s Office. In addition, EEPC should consider researching opportunities and seeking funding from alternative sources (i.e., State and/or federal government, as well as private sources) to diversify its funding stream.

EEPC Response: EEPC agreed, stating: “The EEPC will continue to request funds from the Mayor’s Office (via the Office of Management and Budget (OMB)) to address our City Charter mandate. The EEPC has and will continue to request waivers from any budget-reduction proposals, in order to retain current staffing (eight permanent positions). . . . With respect to seeking funding from state, federal, and/or private sources, the EEPC has discussed this at several Commission meetings and concluded that it simply does not have the luxury of having its staff take time away from audits to research grants and/or prepare grant proposals. Furthermore, any grants it may receive could raise conflicts and would only provide a temporary solution because grants are of finite durations.”

2. Ensure that agencies not audited within the previous (2005–2008) and current (2009–2012) audit periods are the next agencies scheduled to be audited. In particular, the Mayor’s Office, City Council, and Law Department should be the first audits assigned and initiated as current engagements are completed.

³ An EEPC desk audit consists of submitting a questionnaire to a specified agency, obtaining and reviewing the agency’s response along with required submissions, and rendering a formal letter of determination (or findings). A full-scale (or comprehensive) audit consist of meeting and interviewing various agency personnel, conducting surveys, analyzing agency data, and rendering a written communication of determination (or findings).

EEPC Response: EEPC generally agreed, stating “The EEPC 2011 Audit Plan includes the Law Department, while 2012 Audit Plan includes the Office of the Mayor and New York City Council. Accordingly, this recommendation has been implemented. Further, the EEPC will continue to develop audit plans to ensure that agencies not audited in the current audit period (2009-2012) are included in the next audit cycle. As you are aware, however, the EEPC does not have sufficient staff to audit every agency under its jurisdiction in a four-year cycle.”

Auditor Comment: We acknowledge EEPC’s constraints. Nevertheless, being that EEPC never completed its audits of the Mayor’s Office or City Council that were initiated in 2006 and last audited the Law Department in 2004, at a minimum it should ensure that audits of these agencies are not only scheduled, but are also initiated as soon as current engagements are completed.

3. Facilitate the development of its desk audit protocols so that audits of agencies subject to the expanded applicability of desk audits can be scheduled and audits initiated.

EEPC Response: EEPC generally agreed, stating: “The EEPC has created an audit protocol for city agencies with 150 or fewer city employees. To date, eleven audits have been initiated with these enhance protocols. . . . The EEPC also adopted audit resolutions for four small city agencies during the September 9, 2011 Commission meeting. To date, Commission staff has completed audits of thirteen of the thirty-eight agencies in the *EEPC Audit Plan/Calendar Year 2011 (Revised)*.”

DETAILED SCOPE AND METHODOLOGY

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. This audit was conducted in accordance with the audit responsibilities of the City Comptroller as set forth in Chapter 5, §93, of the New York City Charter.

The audit scope was Calendar Years 2009 through 2011 (up to and including June 30, 2011). To accomplish our objective, we carried out audit procedures as detailed below.

To understand EEPC's general roles and responsibilities, we reviewed Chapters 36 of the New York City Charter. We also reviewed published reports, such as the Mayor's Management Reports, Executive Budgets, and the Comptroller's Comprehensive Annual Financial Reports (CAFR), to ascertain EEPC resources and staffing covering Fiscal Years 2009 through 2011. Further, we reviewed prior audit reports that addressed EEPC's operations, issued by the City Comptroller.⁴ As part of our review of EEPC's internal controls, we reviewed EEPC's audit practices. We also examined related documentation from the previous audit, interviewed EEPC officials, ascertained whether any significant changes were made to EEPC's controls since the earlier audit, and if so, determined their adequacy.

To assess EEPC's efforts to address and implement the two recommendations made in our prior audit, for the period January 1, 2009 through June 30, 2011, we reviewed relevant EEPC correspondence with the City Council's Civil Rights Committee, the Department of Citywide Administrative Services, and the office of Management and Budget along with transcripts of EEPC officials' testimony before the City Council's Civil Rights Committee, in which EEPC requested additional funding to increase its audit staff.

To assess EEPC's efforts to schedule audits of agencies that were not conducted during the 2005-2008 audit period, we examined and reconciled the list of agencies under EEPC's jurisdiction during the prior (2005-2008) and current (2009-2012) audit periods with the list of agencies reported in the Comptroller's CAFR for Fiscal Year ended June 30, 2010. We also reviewed EEPC's audit plans for Calendar Years 2009 through 2011. For audits reported as completed in the current audit period, we obtained the audit resolution letters⁵ as evidence of the completion of those audits. For agencies identified by EEPC for which audits had been initiated and were ongoing as of June 30, 2010, we obtained audit engagement letters and preliminary audit documentation, such as entrance conference memoranda and initial information requests, as evidence of those audits.

⁴ *Audit Report on the Operating Procedures of the Equal Employment Practices Commission* (#MD04-078A), issued June 22, 2004; *Follow-up Audit on Certain Practices of the Equal Employment Practices Commission* (#MD99-167F), issued May 12, 1999; and *Audit on Certain Practices of the Equal Employment Practices Commission* (#MD97-065A) issued March 6, 1997.

⁵ The audit resolution letters, which are signed by EEPC's Chair, document the preliminary determination of the audit and signify the end of the audit testing.



EQUAL EMPLOYMENT PRACTICES COMMISSION

City of New York

40 Rector Street, 14th Floor, New York, New York 10006

Telephone: (212) 788-8646 Fax: (212) 788-8652

Cesar A. Perez, Esq.
Chair
Angela Cabrera
Malini Cadambi Daniel
Elaine S. Reiss, Esq.
Arva A. Rice
Commissioners

Abraham May, Jr.
Executive Director
Charise Hendricks
Deputy Director
Judith Garcia Quiñonez
Counsel

September 27, 2011

By Email and Mail

Tina Kim
Deputy Comptroller For Audits
Office of the Comptroller
1 Centre Street, Room 1100
New York NY 10007-2341

Re: Response to the Draft Follow-Up Audit Report/MJ11-123F

Dear Deputy Comptroller Kim:

We have reviewed the draft follow-up audit report prepared for the Equal Employment Practices Commission (EEPC) dated September 13, 2011. We are pleased to see that the audit confirms that the EEPC has implemented both recommendations issued in the May 29, 2009 Audit Report (#MD09-057A).

In response to the recommendations in the draft follow-up report please note the following:

Recommendation #1 Continue to advocate for greater resources from City Council and the Mayor's Office. In addition, EEPC should consider researching opportunities and seeking funding from alternative sources (i.e., State and/or federal government, as well as private sources) to diversify its funding stream.

Response to Recommendation #1

The EEPC will continue to request funds from the Mayor's Office (via the Office of Management and Budget (OMB)) to address our City Charter mandate. The EEPC has and

will continue to request waivers from any budget-reduction proposals, in order to retain current staffing (eight permanent positions).

While, the New York City Council allocated funds to the EEPC in FY '04, FY '05, and FY '06, it discontinued EEPC funding beginning in FY '07 and has rejected all of the EEPC's requests for funding since then.

To establish a permanent solution to our funding shortfalls, in August 2010, this Commission submitted a proposal to the New York City Charter Revision Commission. The proposal would institutionalize funding for this Commission in a manner similar to Section 259b of the New York City Charter. (i.e., the Independent Budget Office is funded at an amount "not less than 10 per centum of the appropriations available for the Office of Management and Budget.")

In the interim, the EEPC sought relocation from privately-owned office space to city-owned space and requested that the OMB allow the EEPC to re-allocate the lease expense funds (approximately \$180,000.00) to hire additional audit staff (from 4 to 5 employees) without any increase to its budget. The OMB indicates that it will not issue a decision until the EEPC has relocated to city-owned space. According to the Department of Citywide Administrative Services, the EEPC will relocate to city-owned office space by the end of the calendar year.

With respect to seeking funding from state, federal and/or private sources, the EEPC has discussed this at several Commission meetings and concluded that it simply does not have the luxury of having its staff take time away from audits to research grants and/or prepare grant proposals. Furthermore, any grants it may receive could raise conflicts and, would only provide a temporary solution because grants are of finite durations. Commissioner Elaine Reiss testified regarding this issue at before the City Council's Civil Rights Committee on May 25, 2011.

Recommendation #2 Ensure that agencies not audited within the previous (2005-2008) and current (2009-2012) audit periods are the next agencies scheduled to be audited. In particular, the Mayor's Office, City Council, and Law Department should be the first audits assigned and initiated as current engagements are completed.

Response to Recommendation #2

The EEPC 2011 Audit Plan includes the Law Department, while 2012 Audit Plan includes the Office of the Mayor and New York City Council. Accordingly, this recommendation has been implemented.

Further, the EEPC will continue to develop audit plans to ensure that agencies not audited in the current audit period (2009-2012) are included in the next audit cycle. As you

are aware, however, the EEPC does not have sufficient staff to audit every agency under its jurisdiction in a four-year cycle.

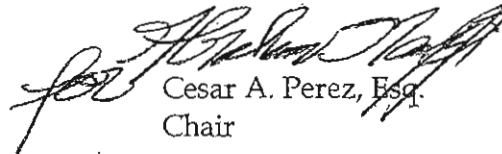
Recommendation #3 Facilitate the development of its desk audit protocols so that audits of agencies subject to the expanded applicability of desk audits can be scheduled and audits initiated.

Response to Recommendation #3

The EEPC has created an audit protocol for city agencies with 150 or fewer city employees. To date, eleven audits have been initiated with these enhance protocols. (Copies of the Audit Initiation Letters to six of those agencies were forwarded to your auditors on June 22, 2011; Audit Initiation Letters were forwarded to five additional agencies in late June.) The EEPC also adopted audit resolutions for four small city agencies during the September 9, 2011 Commission meeting. To date, Commission staff has completed audits of thirteen of the thirty-eight agencies in the *EEPC Audit Plan/ Calendar Year 2011(Revised)*

We trust this adequately responds to the recommendations in the draft follow-up audit report. If you have any questions, please do not hesitate to contact me.

Sincerely,


Cesar A. Perez, Esq.
Chair