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Release #13-2026
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FOR IMMEDIATE RELEASE
WEDNESDAY, JUNE 17, 2026

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**DOI ISSUES 2025 ANTI-CORRUPTION REPORT FOCUSED ON CORRUPTION RISKS
ASSOCIATED WITH CITY AGENCIES' INTERNAL AUDITING CAPACITIES**

Nadia I. Shihata, Commissioner of the New York City Department of Investigation ("DOI"), issued the 2025 Annual Anti-Corruption Report on the internal auditing capacities of City agencies. Government auditing provides accountability to the public, ensures that public resources and services are being used effectively and ethically, and reduces the risk of corruption. Internal auditing plays a vital role in complementing the work that DOI undertakes to combat corruption and auditors' recommendations provide opportunities for improvement within government. DOI recommends that City agencies conduct audits on a consistent basis. The results from the questionnaire showed that City agencies use different strategies to conduct audits and have varying levels of internal audit capacity. Most agencies reported having at least some staff dedicated to performing internal audits, and that their auditors issue written reports and make recommendations as a result of their audits. The Report demonstrates that many City agencies have robust internal auditing capacities and that many agencies lack an internal audit plan and, in some cases, do not issue written reports or do not have any staff conducting audits. DOI also encourages City agencies to review their existing auditing frameworks with an aim towards maximizing auditing capacities in a manner that aligns with an agency's overall capacity and specific mission.

This Report relies on City agencies' responses to the questionnaire DOI developed and covers the period of October 1, 2024, to September 30, 2025. The 50 agencies that responded to the questionnaire are listed in the Report, which is attached to this release and can be found at this link: [DOI Public Reports](#)

DOI Commissioner Nadia I. Shihata said, "Auditing is a cornerstone of good government – providing accountability to the public as well as assurances that taxpayer resources are being used effectively and with integrity. DOI's Report shows that City agencies indicate they use different strategies to conduct audits and that most agencies report having at least some staff dedicated to performing these important examinations. As the City grapples with budgetary challenges, audits remain a fundamental anti-corruption tool, identifying potential red flags that might lead to inefficiencies or more serious failures."

DOI's Annual Anti-Corruption Report is mandated by [Executive Order 105 \("EO 105"\)](#), which consolidated the Inspector General function within DOI and established the DOI Commissioner as the City's independent Inspector General. EO105 also gave agency heads primary responsibility for maintaining corruption-free agencies, and called upon DOI to assist in their efforts by preparing this annual Report, which summarizes agency-identified corruption vulnerabilities and agencies' remedial strategies. Since 2020, these annual reports have focused on City agencies' responses to a corruption-related issue. Unlike other DOI Reports, these annual reports rely primarily on information and analysis supplied to DOI by City agencies, rather than DOI's own investigative work.

To evaluate the auditing capacity at City agencies, DOI's questionnaire focused on agency staff who perform internal audit functions, recruitment or retention challenges that agencies face with respect to hiring and retaining auditors, the types of audits that agencies are performing and whether they have

internal audit plans, the subject matter of internal audits initiated or completed during the reporting period, and the extent to which agencies have procured external audits.

Findings based on the questionnaire included:

- A majority of agencies, 70 percent, reported having staff who perform internal audit functions, while 30 percent reported that they do not have such staff.
 - Seventeen agencies reported a lower number of active staffers than budgeted headcount.
 - The nine agencies that reported a decrease in budgeted headcount for staff performing internal audit functions between January 2022 and September 2025, cited attrition, vacancy reductions or extended vacancies, and Citywide budget reductions, among other reasons. For those agencies reporting a decrease in active headcount for that same period, agencies cited attrition/turnover, transfers to other employment or the private sector, and retirement, among other reasons.
- Sixteen of the 50 agencies responding reported recruitment or retention challenges specific to auditing titles and job functions, citing funding, salary and financial compensation, and identifying qualified candidates among the contributing factors. Eleven of the responding agencies reported not having issues, and 23 responded that the question was “not applicable,” which included agencies both with and without internal auditing staff.
- The four types of audits that agencies reported most commonly performing were: (1) Performance/Operations, (2) Financial, (3) Compliance, and (4) Contract. The questionnaire revealed that City agencies perform a range of audits that include fraud detection, information technology, and program focused, among other areas.
- City agencies were split with respect to whether they have an internal audit plan, which generally consists of a plan detailing anticipated audit services for a given period of time. Half responded that they did have a plan and the other responded that they did not, indicating that certain events could trigger an internal audit, such as a request from a commissioner or other senior official, a request from an external entity or the occurrence of a specific incident or identification of risks, among other instances.
- Thirty-three agencies reported that their auditors make recommendations for improvement.
- Agencies reported a significant number of initiated and completed audits, with numerous agencies reporting the following:
 - Mandatory physical inventories;
 - Mandatory and discretionary pension payroll audits;
 - Mandatory audits of petty cash or employee expenses;
 - Discretionary invoice reviews;
 - Discretionary risk assessments, cybersecurity audits and contract payment audits.
- Twenty-one of the 50 respondents reported that they had procured the services of external auditors to perform an audit of an agency’s programs or activities in the past five years. Of the 15 agencies that reported they did not have staff who perform internal audit functions, only one of those agencies reported procuring the services of external auditors in the past five years. In other words, agencies without internal auditors were *not* more likely to hire external auditors in the past five years.

Commissioner Shihata thanked all the responding City agencies that took the time to assess their audit functions and respond to DOI’s questionnaire.

This Report was prepared by Legal Fellow Dylan Evans and was supervised by Director of Intergovernmental Affairs and Special Counsel Rebecca Chasan and Acting Deputy Commissioner of Legal Affairs and General Counsel Andrew Sein.

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.

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New York City
Department of Investigation



2025 Annual Anti-Corruption Report

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Commissioner

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June 2026

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I. Introduction

The Commissioner of the Department of Investigation (DOI) serves as the City's independent inspector general, supervising a staff of Inspectors General responsible for investigating and eliminating corruption and conflicts of interest throughout City government. Mayoral Executive Order No. 105 (E.O. 105) established this structure in 1986, consolidating the Inspector General functions of various City agencies within DOI.

E.O. 105 also made agency heads “principally responsible for maintaining corruption-free agencies . . . by developing procedures and systems to protect against corrupt and other criminal activity affecting their agency, by hiring employees of integrity and competence, by careful managerial oversight and high-quality supervision of agency employees, and by adequate review and monitoring of fiscal commitments and processes within their respective agency.” City Charter § 389(a) likewise requires agency heads to maintain “an internal control environment and system which is intended to maximize the effectiveness and integrity of agency operations and to reduce the vulnerability of the agency to fraud, waste, abuse, error, conflict of interest, and corruption.”

E.O. 105 calls upon DOI to assist agencies in their efforts by preparing this Annual Anti-Corruption Report. The Annual Anti-Corruption Report describes the corruption hazards identified at City agencies and the strategies identified by the agencies, in consultation with DOI, to address those hazards. Although E.O. 105's mandate applies only to mayoral agencies, DOI invited non-mayoral agencies to participate in this report and ten non-mayoral agencies contributed, as well as 40 mayoral agencies.

DOI's Anti-Corruption Report, unlike most of DOI's reports, is not the product of DOI's investigative work but rather summarizes approaches taken by City agencies to address risks of corruption, misconduct, or other criminal activity. DOI generally obtains this information by submitting questions to other City agencies and analyzing their responses. The public release of this report is intended to promote information-sharing and transparency around corruption hazards and the measures used by City agencies to combat corruption. In order to promote candid responses by the agencies participating in this and future questionnaires, individual agency responses have either been aggregated or anonymized, where appropriate.

II. Executive Summary

The focus of the 2025 Anti-Corruption Report (the “Report”), which covers the period of October 1, 2024 through September 30, 2025, is the internal auditing capacities of the City’s agencies. To evaluate this issue, DOI developed a questionnaire (the “Questionnaire” or “DOI’s 2025 Anti-Corruption Questionnaire”) regarding the agency staff who perform internal audit functions, recruitment or retention challenges that agencies face with respect to hiring and retaining auditors, the types of audits that agencies are performing and whether they have internal audit plans, the subject matter of internal audits initiated or completed during the reporting period, and the extent to which agencies have procured external audits.

In general terms, auditing in the public sector is a “systematic process of objectively obtaining and evaluating evidence to determine whether information or actual conditions conform to established criteria.”¹ Audits conducted by government agencies are essential to providing accountability to the public, as well as to legislators or oversight bodies.² They aid in ensuring that public resources and services are being used and delivered effectively, efficiently, ethically, and lawfully.³

It is critical for audits to be conducted with integrity, based on judgments free of bias and outside influence.⁴ This strengthens and maintains public confidence in government.⁵ Auditing also encourages proper conduct within government and reduces the risk of public corruption.⁶ In this respect, internal auditing plays a vital role in complementing the work that DOI undertakes to combat corruption across City agencies. Moreover, auditors’ recommendations provide opportunities for improvement within government.⁷

Government auditing takes various forms, but generally consists of audits of financial statements, of compliance with authorities, and performance audits.⁸ Financial audits typically assess whether financial information and statements are presented fairly and in accordance with established criteria.⁹ Performance audits may pertain

¹ See The International Organization of Supreme Audit Institutions, *ISSAI 100 – Fundamental Principles of Public-Sector Auditing*, (“ISSAI-100”), 10, available at: <https://www.issai.org/wp-content/uploads/2025/09/ISSAI-100-EN-rev.pdf>.

² See United States Government Accountability Office, *Government Auditing Standards (2024 Revision)*, (“GAGAS”), §§ 1.02-05 (2024), available at: <https://guides.gaoinnovations.gov/yellowbook/2024/GAO-24-106786.pdf>.

³ See *id.*

⁴ See Anderson, David G. “Effective Construction Claim Resolution: Understanding DCAA.” 43 Pub. Cont. L.J. 165, 170 (2014).

⁵ See GAGAS, § 3.09.

⁶ See The Institute of Internal Auditors, *The Role of Auditing In Public Sector Governance*, 4 (2006), available at: https://www.ca-ilg.org/sites/main/files/file-attachments/auditing_in_public_sector.pdf.

⁷ ISSAI-100 at 10-11.

⁸ *Id.*

⁹ GAGAS § 1.17.

to assessments of program performance, effectiveness, and compliance with objectives.¹⁰ Meanwhile, compliance audits focus on whether activities comply with the authorities governing the audited entity, such as rules, laws, policies, and codes.¹¹

This Report reviews the auditing capacities of the City's agencies. The results of the Questionnaire indicate that City agencies use different strategies to conduct audits and have varying levels of internal audit capacity. With that said, most agencies reported having at least some staff dedicated to performing internal audits, and that their auditors issue written reports and make recommendations as a result of their audits. Seven agencies even referred findings from internal audits to DOI during the review period.

Only half of responding agencies reported that they have an internal audit plan, which is a plan that "identifies the engagements and other internal audit services anticipated to be provided during a given period."¹² This may include specifying the internal audit services that support the evaluation and improvement of the organization or agency, as well as identifying the resources necessary to accomplish the plan.¹³ Internal audit plans enhance the ability of agencies to achieve their objectives, and it is best practice to have one.¹⁴

For those agencies that lack an audit plan, some reported relying on requests from management to trigger an audit, and others reported that audits are conducted only when issues/risks are identified. In addition, a minority of agencies reported issues with recruiting and retaining qualified auditors, and, in some cases, reported having fewer active auditing staff than the budgeted headcount.

The Questionnaire also revealed that City agencies perform many different types of audits. Although performance, financial, and compliance audits were the most common, agencies also reported a significant number of other, more specific audits. These included audits pertaining to fraud detection, information technology, training and human resources, programs, field audits, and ballot security, among others. A significant minority of agencies also procured external audit services.

¹⁰ *Id.* §§ 1.21-22.

¹¹ ISSAI-100 at 11.

¹² The Institute of Internal Auditors, *Global Internal Audit Standards*, 12 (2024), available at: [globalinternalauditstandards_2024january9.pdf](https://www.iaa.org/globalinternalauditstandards_2024january9.pdf).

¹³ *See id.* at 66.

¹⁴ *See id.* *See also id.* at 31, 60.

III. The Questionnaire Results

A. Respondents

Fifty agencies responded to DOI’s 2025 Anti-Corruption Questionnaire. Ten of the respondents were non-mayoral agencies. Table 1 below lists the agencies/offices that submitted a response:

Table 1. Respondents to DOI’s 2025 Anti-Corruption Questionnaire¹⁵

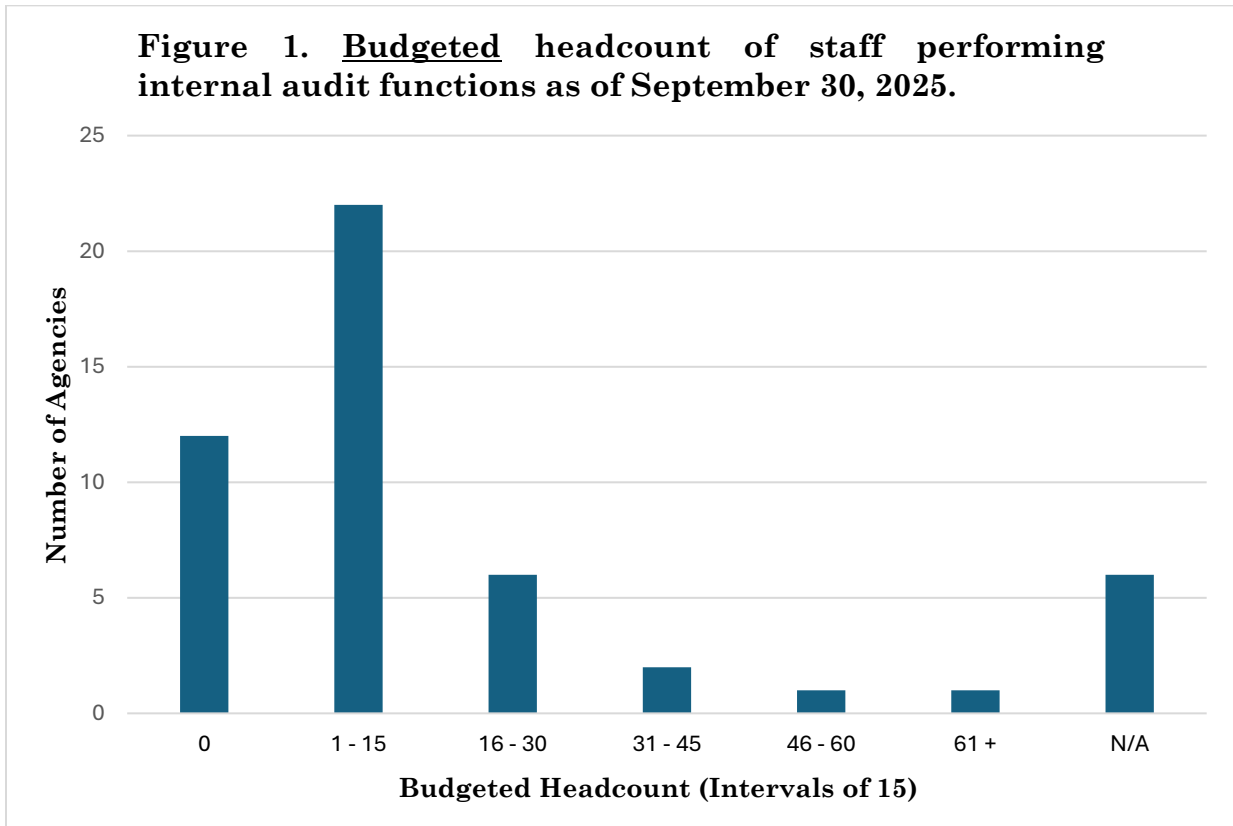
Office of Management & Budget	Office of the Chief Medical Examiner
Department of Citywide Administrative Services	Office of Tax Administrative Appeals
School Construction Authority*	Mayor’s Office
Department of Design & Construction	Department of Transportation
Law Department	Taxi & Limousine Commission
Department of Buildings	Department for the Aging
Office of Administrative Trials & Hearings	Department of Probation
Employees’ Retirement Systems*	Department of Consumer and Worker Protection
Housing Development Corporation*	Fire Department
Administration for Children’s Services	Department of Correction
Business Integrity Commission	Mayor’s Office of Criminal Justice
Health + Hospitals*	Department of Cultural Affairs
Department of Health and Mental Hygiene	Department of Investigation
Mayor’s Office of Contract Services	Department of Veterans’ Services
Housing Authority*	Police Department
Civilian Complaint Review Board*	Commission on Human Rights
Financial Information Services Agency & Office of Payroll Administration*	Department of Youth & Community Development
Landmarks Preservation Commission	Department of Small Business Services
Department of City Planning	Office of Technology & Innovation
Board of Elections*	Department of Housing Preservation & Development
Department of Parks & Recreation	Economic Development Corporation*
Emergency Management	Campaign Finance Board*

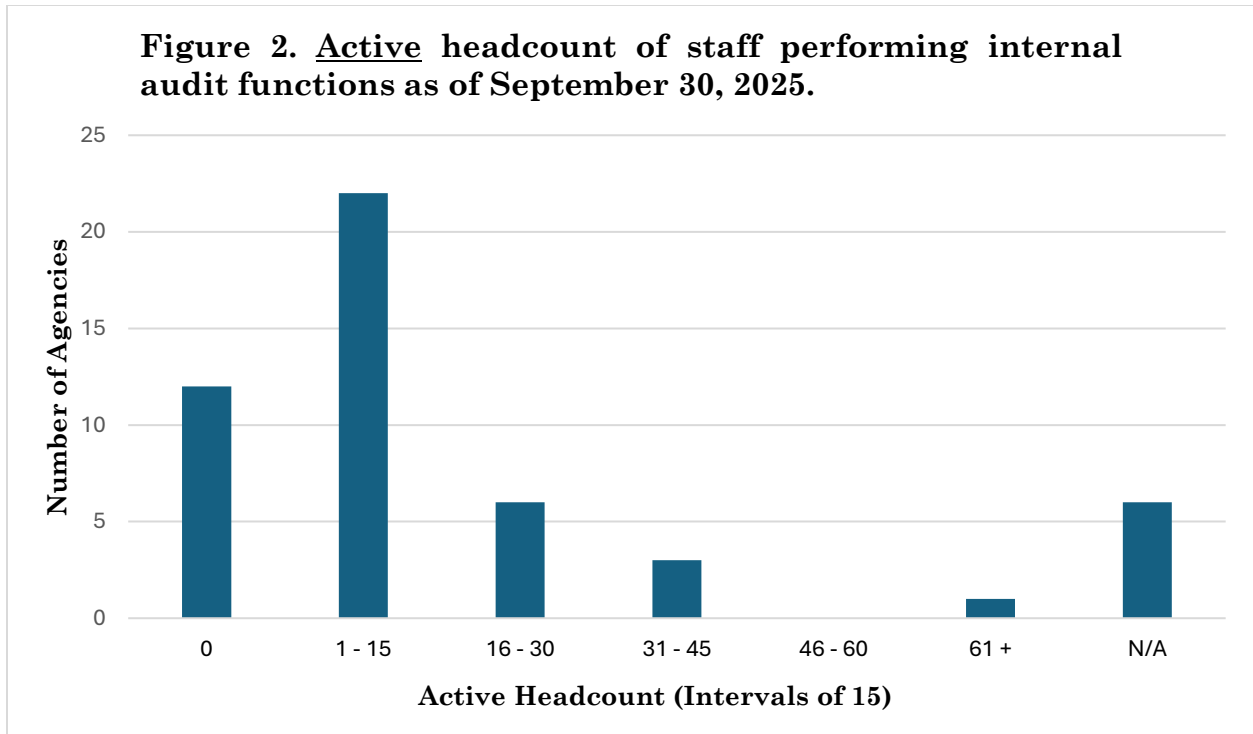
¹⁵ Respondents marked with an asterisk are non-mayoral agencies.

Department of Social Services	Department of Finance
Department of Sanitation	Department of Environmental Protection
Office of Labor Relations	Department of Records and Information Services

B. Staff Performing Internal Audit Functions

A majority of agencies (70%) reported having staff who perform internal audit functions, while 30% reported that they do not have such staff. Figures 1 & 2 below show agencies’ budgeted and active headcount of internal audit staff as of September 30, 2025:





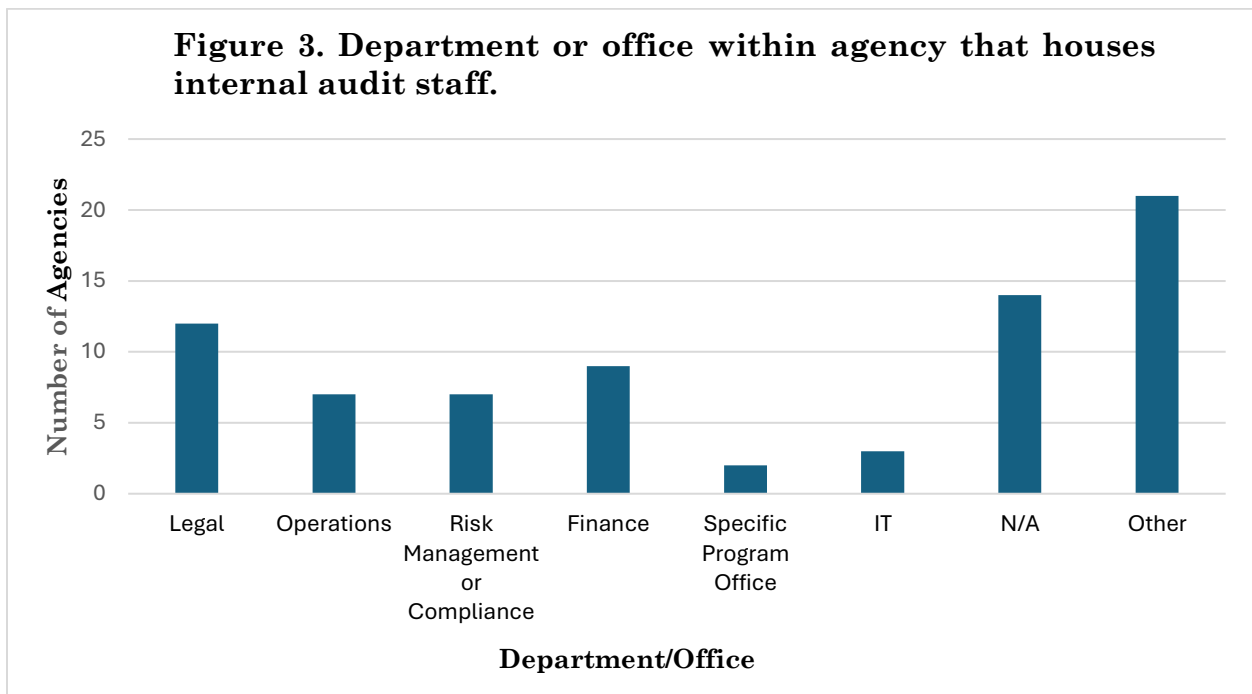
Seventeen agencies reported a lower number of active staffers than budgeted headcount. The majority (12) of those agencies reported a vacancy rate of 25% or less, meaning that at least 75% of their respective budgeted positions were filled. Only two agencies reported a 50% vacancy rate (i.e., that they had half as many active auditing staff as was budgeted), but in those cases the number of budgeted staff was just four and two, respectively. Separately, two other agencies reported having zero active auditing staff despite reporting a budgeted headcount for auditing staff. In these cases, however, the agencies reported that they were either a new office that was not yet staffed, or that the auditing position itself was created recently and the agency was in the process of interviewing for that role.

For the nine agencies that reported a decrease in budgeted headcount for staff performing internal audit functions between January 2022 through September 2025, they cited attrition, vacancy reductions or extended vacancies, and Citywide budget reductions, among other reasons. For those agencies reporting a decrease in active headcount for that same period, agencies cited attrition/turnover, transfers to other employment or the private sector, and retirement, among other reasons.

Along similar lines, the Questionnaire asked the agencies to state the office titles of current staff who perform internal audit functions, as well as the civil service titles of current staff who perform internal audit functions. The most commonly reported office titles were auditor, senior auditor, staff auditor, assistant commissioner, director or assistant director, and director of internal audit. The most common civil service titles, meanwhile, consisted of management auditor, administrative

management auditor, administrative staff analyst, and associate staff analyst. However, City agencies reported a wide range of additional titles, indicating that there is variance among the agencies regarding which personnel conduct audits as part of their duties.

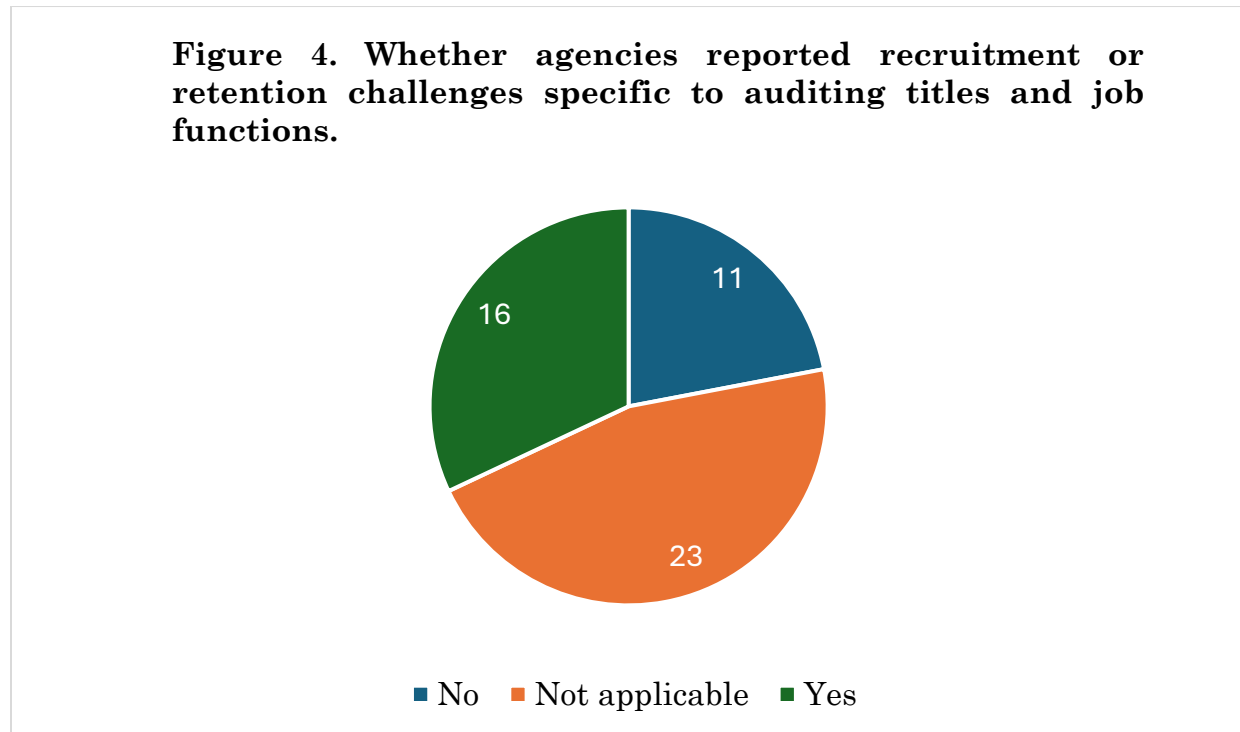
The Questionnaire also asked the agencies to report which departments or offices within their respective agency house the internal audit staff. To guide the agencies in their responses, the Questionnaire set forth the following non-exhaustive list: Finance, Operations, Legal, Risk Management or Compliance, Information Technology, Specific Program Office, and Other. Of these, Legal was the most commonly reported department, followed by Finance. However, numerous other office/departments were reported. This included, in a few instances, a designated “Internal Audit Department,” or in one case, an “Integrity and Standards Office.” Figure 3 below shows the agencies’ responses:



With respect to job-specific training and how often staff receive auditing training, City agencies’ answers again varied. However, several cited continuing professional education (CPE) credits, trainings provided by the Department of Citywide Administrative Services (DCAS), and annual training requirements. Some agencies also cited other courses, webinars, workshops, coursework, audit certifications, or periodic trainings offered both internally and by third-party providers.

C. Recruitment/Retention Challenges

Building off questions concerning the staff who perform internal audit functions, the Questionnaire asked agencies to identify whether they had any recruitment or retention challenges specific to those titles and job functions. Most agencies did not report having recruitment or retention challenges. Figure 4 below shows the agencies' responses:¹⁶

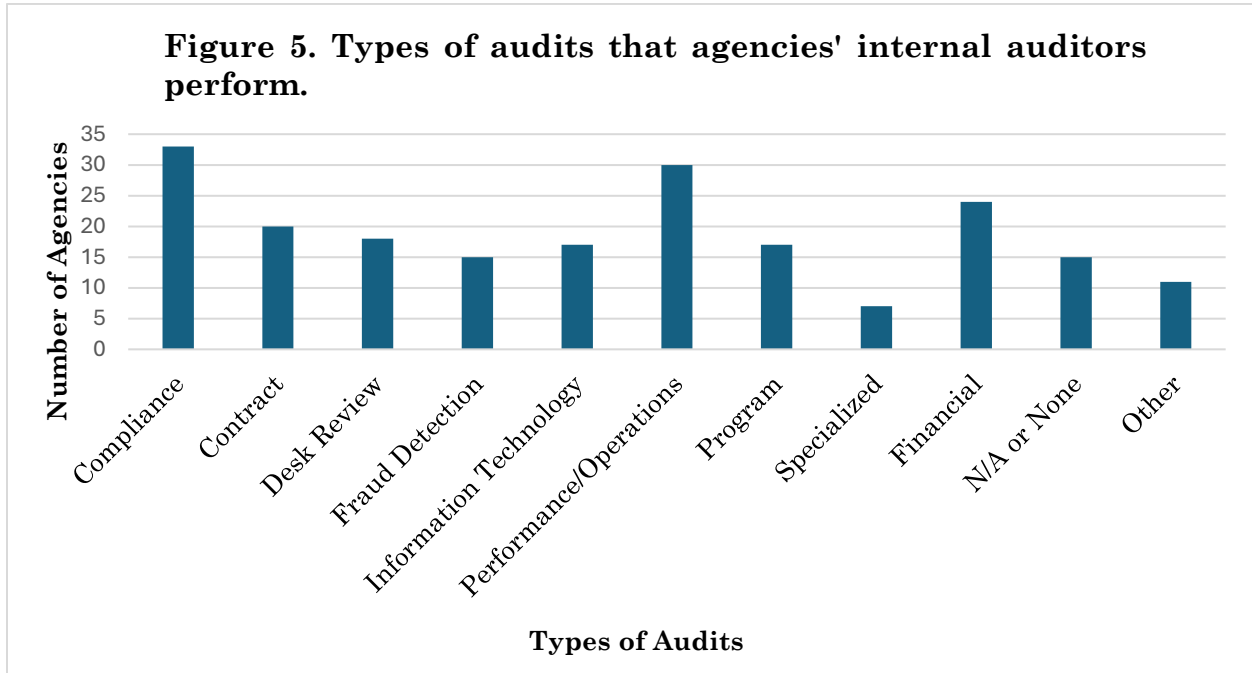


For those agencies that reported recruitment and/or retention issues, numerous agencies cited issues of funding, salary and financial compensation, and identifying qualified candidates. Agencies also cited City-wide hiring freeze policies and lengthy hiring and approval processes for new employees. As one agency reported, “it is challenging to obtain qualified and experienced audit professionals due to the competitive nature of the salary for these positions.” Or, as another agency noted, a role in auditing “requires specific knowledge in the City’s processes including contracting processes and regulations . . . It is difficult to find qualified candidates with transferable skillsets, especially for lower-level roles which do not require prior civil service experience.”

¹⁶ Agencies that responded “not applicable” to this question included agencies both with and without internal auditing staff.

D. Types of Audits Performed & Existence of Internal Audit Plans

The Questionnaire asked agencies to list the types of audits that internal auditors perform. The four types of audits that agencies reported were most commonly performed were (1) Performance/Operations; (2) Financial, (3) Compliance, and (4) Contract. However, the Questionnaire revealed that City agencies perform a wide range of audits, indicating the unique auditing needs that each agency may have. Figure 5 below shows the audits performed, organized according to the number of agencies performing each type of audit:



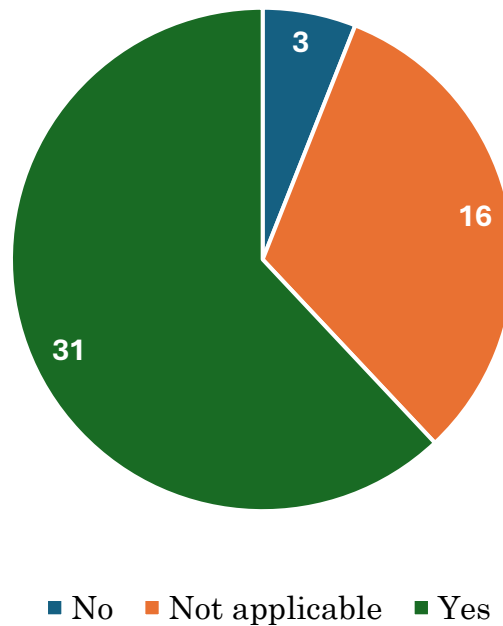
Notably, the City agencies were split with respect to whether they have an internal audit plan—which, as discussed above, generally consists of a plan detailing anticipated audit services for a given period of time. Half responded that they did have such a plan, while the other half responded that they did not. Agencies that reported not having a plan indicated that the following events (among others) could trigger an internal audit:

- A request from a commissioner, deputy commissioner, or management;
- A request from an external entity;
- The occurrence of a specific incident or the identification of risks;
- An external referral or report of fraud, waste, or abuse;
- An outside inquiry from an oversight entity; and
- When issues are identified through the review of performance metrics.

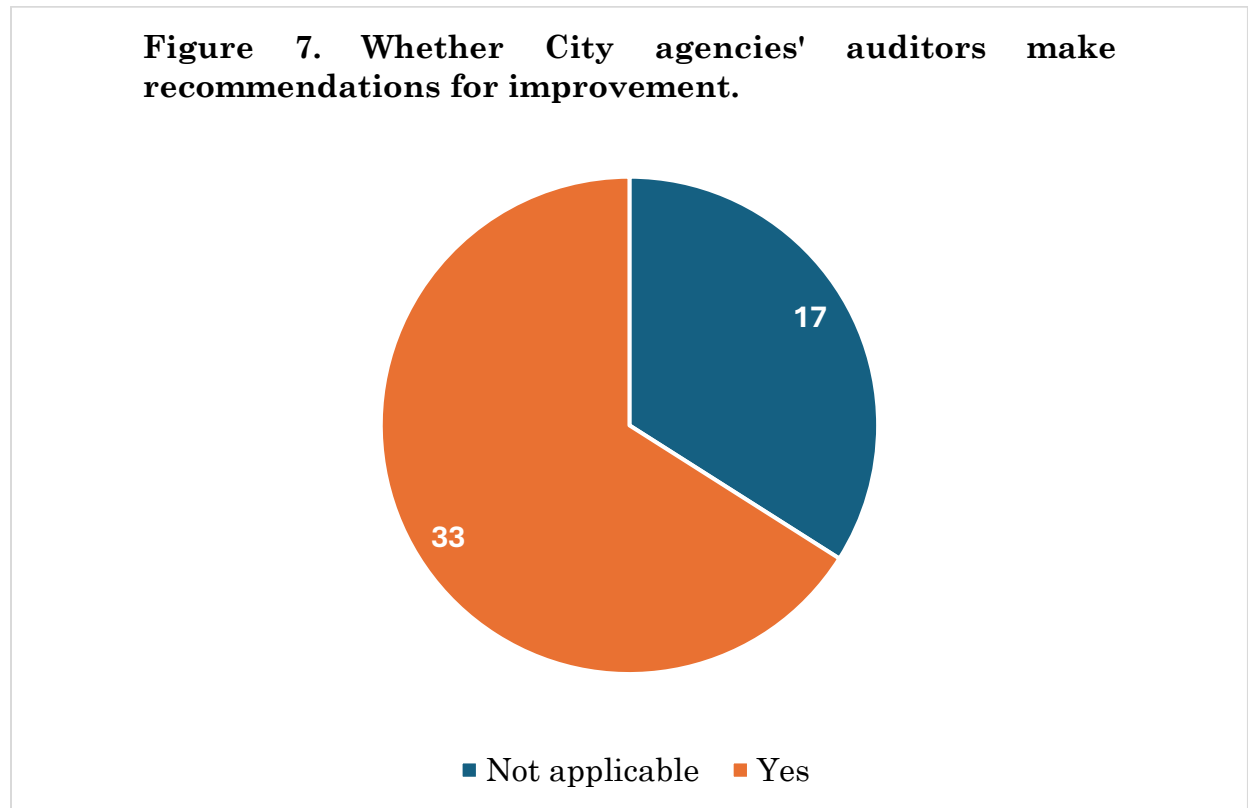
In contrast, for those agencies that reported having an internal audit plan, the Questionnaire asked what the duration of the agency’s internal audit plan was.

Durations varied, but numerous agencies reported that their internal audit plan was based on an annual or “one year” schedule. Some other agencies reported plans between two and four years. Additionally, for those agencies that reported having an internal audit plan, a significant majority indicated that additional audits may also be performed outside the schedule of the internal audit plan. Agencies reported that such audits could be prompted by requests from management, issues/events identified that required review, risks that materialized in other organizations prompting an agency to determine whether it faced a similar risk, suspected fraud or misconduct, major operational changes, and the receipt of an external audit report/finding. Recommendations by DOI to take action as appropriate to address allegations or other issues, as well as referrals by DOI, were also cited as reasons to trigger an audit outside the scheduled audit plan. The majority of agencies, though not all, also reported that their auditors issue written reports. *See Figure 6:*

Figure 6. Whether City agencies' auditors issue written reports.



Similarly, and significantly, the majority of agencies also reported that their auditors make recommendations for improvement. See Figure 7:



Expanding on this line of inquiry, the Questionnaire asked the agencies to describe their internal processes for reviewing internal audit findings and/or recommendations after they are issued, and for taking any corrective action. Several agencies reported implementing and tracking corrective actions. This included follow-up audits, internally developed tools to track open action plans, management reviews to track progress, the issuance of a final audit report and resolution after an exit conference is held, as well as plans to escalate unresolved issues to external oversight.

Seven agencies also reported that in the last year, their respective auditing staff/departments had made a report to DOI regarding findings from performed or completed audits.

E. Subject Matter of Internal Audits

The Questionnaire asked the agencies to briefly describe the subject matter of all internal audits *initiated* by their agency in the period of October 1, 2024, through September 30, 2025, including audits required by any Comptroller Directive. For each listed audit, the Questionnaire asked the agencies to indicate whether the audit was “mandatory” or “discretionary.” Similarly, the Questionnaire asked the agencies to

list and describe the same with respect to *completed* internal audits. Agencies reported a significant number of initiated and completed audits, with numerous agencies reporting the following:

- Mandatory physical inventories;
- Mandatory & discretionary pension payroll audits;
- Mandatory audits of petty cash or employee expenses;
- Discretionary invoice reviews;
- Discretionary risk assessments;
- Discretionary cybersecurity audits; and
- Discretionary contract payment audits.

Thirty-two respondents (64%) also reported that they administered programs or received funding or grants, other than City tax levy funding, that had an audit mandate.

F. Procurement of External Audits

In addition to questions regarding internal audits, the agencies were asked to report whether, in the past five years, they had procured the services of external auditors to perform an audit of agency programs or activities. Twenty-one of the fifty respondents (42%) reported that they had. However, of the fifteen agencies that reported that they did not have staff who perform internal audit functions, only one of those agencies reported procuring the services of external auditors in the past five years. In other words, agencies without internal auditors were *not* more likely to hire external auditors. Meanwhile, of the thirty-five agencies that did report having internal auditors, twenty (approximately 57%) also reported procuring the services of external auditors in the past five years.

As a follow-up question, the Questionnaire asked agencies to list and describe those external audits. The following are some examples of external audits procured in the past five years:

- Audit of an agency's payroll, timekeeping and employee benefits;
- Review of an agency's internal auditing department;
- Assurance audit into post-employment benefits;
- Review of documentation and coding in an electronic medical records system;
- Assessment of an agency's data privacy and security controls;
- Cost reimbursement and forensic audits to identify irregularities, conflicts of interest, or violations of applicable regulations, contract terms, or organizational policies;
- Evaluation of recruitment practices and efforts; and
- Financial, coding, compliance, and security audits.

Similarly, the Questionnaire asked the agencies to identify any external, third-party audits that were initiated or completed with respect to their agency in the reporting period of October 1, 2024, through September 30, 2025. Across the agencies, several external audits were reported, including numerous audits conducted by the New York City Comptroller and the New York State Comptroller. Some agencies also cited audits conducted by federal agencies and private auditing firms. Third-party audits pertained to a number of topics, including (but not limited to) the following:

- Personnel management practices;
- Management of real property;
- Review of procurement contracts;
- Workers' bonus claims;
- Payment practices to not-for-profit vendors/contractors;
- Vendors' use of subcontractors;
- Timeliness of investigations;
- Practices pertaining to the Freedom of Information Law;
- Handling of workplace complaints; and
- Automated employment decision tools.

IV. Conclusion

Government auditing provides accountability to the public and ensures that public resources and services are being used effectively and ethically. It also reduces the risk of corruption. DOI recommends that City agencies conduct audits on a consistent basis. While this Report demonstrates that many City agencies have robust internal auditing capacities, it also reveals that many agencies lack an internal audit plan and, in some cases, do not issue written reports or do not have any staff conducting audits. Accordingly, DOI further recommends that City agencies consider formulating a plan for internal auditing to the extent they currently lack one.

However, as DOI recognizes that each agency's auditing needs are unique, DOI also encourages City agencies to review their existing auditing frameworks with an aim towards maximizing auditing capacities in a manner that still accords with an agency's overall capacity and specific mission.