



**A Report to the
Audit Committee**

Mayor
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Resources Director**
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**Audit Recommendations Follow-up –
Audit of EEOC Form 164, State and
Local Government Information (EEO-
4) Reporting (Initial Report Issued
April 5, 2019)**

December 6, 2021

Metropolitan
Nashville
Office of
Internal Audit

EXECUTIVE SUMMARY

December 6, 2021



Why We Did This Audit

To evaluate management's implementation of previous audit recommendations as of August 31, 2021.

What We Recommend

There are no recommendations as management successfully implemented the initial audit recommendations.

Audit Recommendations Follow-up – Audit of EEOC Form 164, State and Local Government Information (EEO-4) Reporting

BACKGROUND

On April 5, 2019, the Office of Internal Audit issued an audit of the EEOC Form 164, State and Local Government Information (EEO-4) Reporting. The audit report included three recommendations for improving the operations related to EEO-4 reporting. All three recommendations were accepted by management for implementation. Office of Internal Audit guidelines require monitoring and follow-up to ensure that the recommendations assessed as high or medium risk are appropriately considered, effectively implemented, and yield intended results.

OBJECTIVES AND SCOPE

The objective of this follow-up audit is to determine whether management's action plans for the prior audit report recommendations are complete.

The audit scope covers the status for the three accepted recommendations included in the April 5, 2019, audit of the EEOC Form 164, State and Local Government Information (EEO-4) Reporting.

WHAT WE FOUND

The Department of Human Resources has implemented all three recommendations made in the initial audit report. Details of the implementation status can be seen in **Appendix A**.

AUDIT FOLLOW-UP RESULTS

The initial audit report included three recommendations for improving the operations related to EEO-4 reporting. All three recommendations were accepted by management for implementation.

The Office of Internal Audit will close a recommendation only for one of the following reasons:

- The recommendation was effectively implemented.
- An alternative action was taken that achieved the intended results.
- Circumstances have so changed that the recommendation is no longer valid.
- The recommendation was not implemented despite the use of all feasible strategies or due to lack of resources. When a recommendation is closed for these reasons, a judgment is made on whether the objectives are significant enough to be pursued later in another assignment.

The audit scope covers the status for the three accepted recommendations included in the April 5, 2019, audit of the EEOC Form 164, State and Local Government Information (EEO-4) Reporting.

METHODOLOGY

To achieve the audit objectives, auditors performed the following steps:

- Reviewed the documentation provided by management as evidence of completion.
- Examined data within the Oracle R12 accounting system.
- Interviewed key personnel within the Department of Human Resources.

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 observations and conclusions based on our audit objectives.

AUDIT TEAM

James Carson, CIA, CFE, In-Charge Auditor
Bill Walker, CPA, CIA, CFE, Principal Auditor
Lauren Riley, CPA, CIA, CFE, ACDA, CMFO, Metropolitan Auditor

APPENDIX A – PRIOR RECOMMENDATIONS AND IMPLEMENTATION STATUS

The following table shows the guidelines followed to determine the status of implementation.

Recommendation Implementation Status	
Implemented	The department or agency provided sufficient and appropriate evidence to support the implementation of all elements of the recommendation and the recommendation's implementation caused or significantly influenced the benefits achieved.
Partially Implemented	The department or agency provided some evidence to support implementation progress but not of all elements of the recommendation were implemented.
Not Implemented / No Longer Applicable	The department or agency did not implement a recommendation because: a) of lack of resources; b) an alternative action was taken that achieved the intended results; c) circumstances have so changed that the recommendation is no longer valid.

The following are the audit recommendations made in our original audit report dated April 5, 2019, and the current implementation status of each recommendation based on our review of information and documents provided by the Department of Human Resources.

Recommendation	Implementation Actions	Outstanding Issues	Implementation Status
A.1 Determine procedures to review or confirm the accuracy of employee demographic information recorded within JD Edwards EnterpriseOne. Assessed Risk Level: Medium	Procedures determined and implemented. Forms were created and distributed to the HR coordinators and managers of each department to distribute to full time and part time employees to provide, on a voluntary basis, race and ethnicity information in an attempt to capture new data or correct data to ensure integrity of the system of record.	None	Fully Implemented/ Closed
A.2 Establish a methodology for determining demographics for employees who choose not to self-identify federally required demographic information. Assessed Risk Level: Medium	Methodology established and communicated to departments. Any employee choosing not to self-identify is identified by the department's HR coordinator or department's HR manager using the visual observance procedure established with all department HR coordinators and managers.	None	Fully Implemented/ Closed
A.3 Create procedures detailing the required steps for employee information collection, EEO-4 summarization, and EEO- 4 form data entry. Assessed Risk Level: Medium	Voluntary Employee Questionnaire for Self-Identification of Race/Ethnicity, the EEO-4 Summarization Report, and the EEO-4 form data entry processes are available with step-by-step instructions for collection and report creation.	None	Fully Implemented/ Closed