

Office of the Auditor General  
Follow-Up Report on Prior Audit Recommendations

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**Selected Activities Related to Investigation  
Timeliness and Complaint Intake**  
Michigan Department of Civil Rights

April 2026

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The auditor general shall conduct post audits of financial transactions and accounts of the state and of all branches, departments, offices, boards, commissions, agencies, authorities and institutions of the state established by this constitution or by law, and performance post audits thereof.

The auditor general may make investigations pertinent to the conduct of audits.

*Article IV, Section 53 of the Michigan Constitution*

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Office of the Auditor General

## Report Summary

### *Follow-Up Report*

### *Selected Activities Related to Investigation*

### *Timeliness and Complaint Intake*

### *Michigan Department of Civil Rights (MDCR)*

**Report Number:**

**151-0200-22F**

**Released:**

**April 2026**

We conducted this follow-up to determine whether MDCR had taken appropriate corrective measures in response to the material condition noted in our August 2023 audit report.

Prior Audit Information	Follow-Up Results		
	Conclusion	Finding	Agency Preliminary Response
Finding 1 - Material condition  Significant improvement needed to timely complete civil rights complaint investigations.  Agency agreed.	Substantially complied		Not applicable.

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**Doug A. Ringler, CPA, CIA**  
Auditor General

April 14, 2026

Luke R. Londo, Chair  
Michigan Civil Rights Commission  
and  
John E. Johnson, Jr., Director  
Michigan Department of Civil Rights  
Cadillac Place  
Detroit, Michigan

Chair Londo and Director Johnson:

This is our follow-up report on the material condition (Finding 1) and corresponding recommendation reported in the performance audit of Selected Activities Related to Investigation Timeliness and Complaint Intake, Michigan Department of Civil Rights. That audit report was issued and distributed in August 2023. Additional copies are available on request or at [audgen.michigan.gov](http://audgen.michigan.gov).

We appreciate the courtesy and cooperation extended to us during our follow-up. If you have any questions, please call me or Laura J. Hirst, CPA, Deputy Auditor General.

Sincerely,

A handwritten signature in black ink that reads "Doug Ringler". The signature is written in a cursive, slightly slanted style.

Doug Ringler  
Auditor General



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# INTRODUCTION, PURPOSE OF FOLLOW-UP, AND AGENCY DESCRIPTION

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## INTRODUCTION

This report contains the results of our follow-up of the material condition\* (Finding 1) and corresponding recommendation reported in our performance audit\* of the Selected Activities Related to Investigation Timeliness and Complaint Intake, Michigan Department of Civil Rights (MDCR), issued in August 2023.

## PURPOSE OF FOLLOW-UP

To determine whether MDCR had taken appropriate corrective measures to address our corresponding recommendation.

## AGENCY DESCRIPTION

MDCR was created in 1965 to carry out the work of the Michigan Civil Rights Commission. MDCR's vision is to secure the full enjoyment of civil rights guaranteed by law and the Michigan Constitution by the elimination of unlawful discrimination through education, investigation, and engagement.

MDCR's primary purpose is to investigate complaints\* of unlawful discrimination in employment, education, housing, public accommodation, and public service under Michigan's Elliott-Larsen Civil Rights Act and the Persons with Disabilities Civil Rights Act. MDCR also has agreements with the U.S. Equal Employment Opportunity Commission and U.S. Department of Housing and Urban Development to accept complaints under those jurisdictions.

State and federal law, the *Michigan Administrative Code*, and MDCR policy provide the framework and requirements for civil rights investigations. MDCR utilizes the Civil Rights Information System (CRIS) to record the receipt of complaints and any intake or investigation activities, case notes, and relevant documentation. MDCR's Enforcement Division is responsible for receiving complaints and conducting impartial investigations. In addition to its investigation duties, MDCR also works to prevent discrimination through community engagement activities and educational programs that promote voluntary compliance with civil rights laws.

During a typical investigation, the claimant\* and respondent\* are given the opportunity to present evidence. MDCR may also interview witnesses, perform document reviews, and conduct site visits, if applicable. If the investigation shows discrimination occurred, MDCR will enforce State civil rights laws. MDCR's strategic plan states its goal\* is to provide timely resolution of allegations of discrimination and intends to complete investigations, on average, within 6 months.

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\* See glossary at end of report for definition.

MDCR has offices in Detroit, Flint, Grand Rapids, Lansing, and Marquette. MDCR was appropriated \$26.9 million in fiscal year 2026 and had 187 full-time employees as of September 30, 2025, including 95 employees in the Enforcement Division.

MDCR completed 4,105 civil rights complaint investigations during the 13-month period ended January 31, 2026 and had 2,368 ongoing investigations at the time of our follow up.

# **PRIOR AUDIT FINDING AND RECOMMENDATION, AGENCY PLAN TO COMPLY, AND FOLLOW-UP CONCLUSION**

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## **FINDING 1**

Audit Finding Classification: Material condition.

Summary of the August 2023 Finding:

MDCR needs to significantly improve its timeliness in completing civil rights complaint investigations to bolster the public's confidence regarding expeditious enforcement of the State's civil rights laws.

Our analysis of MDCR's completed and ongoing investigations noted:

- a. MDCR completed 2,096 investigations of alleged civil rights violations, on average, 19 months (583 days) after receipt of the complaint, significantly exceeding its established six-month goal. MDCR completed approximately 92% of the investigations more than six months after receiving the complaint. Our review of MDCR's records for sampled completed complaint investigations identified significant MDCR investigation delays related to MDCR's assignment of complaints to investigators, initial contact with claimants for interviews, and time periods with no evidence of MDCR actively investigating the complaint.
- b. Nearly 85% of ongoing investigations of alleged civil rights violations had been open for more than six months. On average, the investigations had been open for approximately 18 months (559 days) since receipt of the complaint, making achievement of its 6-month investigation completion goal not possible for the vast majority of ongoing civil rights investigations.

MDCR stated it lacked an adequate number of investigators to complete investigations in a timely manner and informed us MDCR investigators had an average of 80 to 100 cases each. Subsequent to our audit period, MDCR was appropriated \$5.7 million in fiscal year 2024 for additional enforcement staff to assist in reducing the backlog of investigations.

Recommendation Reported in August 2023:

We recommended MDCR significantly improve its timeliness for completing civil rights complaint investigations.

## **AGENCY PLAN TO COMPLY**

MDCR's May 9, 2024 final corrective action plan indicated it agreed with and would comply with the recommendation and will:

- Hire additional staff to address the time it takes to complete civil rights complaint investigations.

- Require new staff to complete a four-to-six-week training program to ensure staff are proficient in their positions.
- Revise policies and procedures to improve guidance related to topics such as the requirements for civil rights managers to monitor their team's complaint investigation activities, improve documentation of progress, and establish timeline goals for assignments to investigators and attempts to conduct the claimant's initial interview.

**FOLLOW-UP  
CONCLUSION**

Substantially complied.

**Investigations Completed**

MDCR completed 1,201 civil rights complaint investigations for complaints received between January 2025 and January 2026. We noted MDCR significantly improved its timeliness in completing investigations and reduced the percentage of investigations open greater than six months. Specifically:

- MDCR completed investigations of alleged civil rights violations, on average, six months (192 days) after receipt of the complaint.

MDCR Investigations Completed January 1, 2025 Through January 31, 2026	
Time Elapsed From Complaint Receipt to OAG Follow-Up Date	Number (Percentage) of Open Investigations
6 months or less	574 (48%)
More than 6 months to 12 months	608 (51%)
More than 12 months to 24 months	19 ( 2%)
Total completed investigations	1,201
MDCR investigations were completed, on average:	192 days

In the original audit, we noted MDCR took 583 days on average to complete investigations, and approximately 92% were open more than six months.

**Investigations Received and Still Open**

We reviewed the 10 longest complaint investigations received during the above time period and still open and noted MDCR significantly improved its timeliness in assigning the complaints to investigators, conducting the initial interviews, and reducing the periods of inactivity with the investigations.

- Approximately 40% of all ongoing investigations received after January 1, 2025 were open for more than six months after the receipt of the complaint. On average, ongoing investigations had been open 169 days since the receipt of the complaint. In the original audit, we noted nearly 85% were over six months old, and ongoing investigations had been open an average of 559 days.

### MDCR Open Investigations

Time Elapsed From Complaint Receipt to OAG Follow-Up Date	Number (Percentage) of Open Investigations Received After January 1, 2025
6 months or less	1,181 (60%)
More than 6 months to 12 months	758 (38%)
More than 12 months to 24 months	33 ( 2%)
Total open investigations	1,972
MDCR's ongoing investigations had been open, on average:	169 days

The Legislature began increasing MDCR's appropriations and full-time equated (FTE) positions for compliance and enforcement operations in fiscal year 2023 (see supplemental information). As of March 5, 2026, MDCR investigators had an average of 23 assigned investigations.

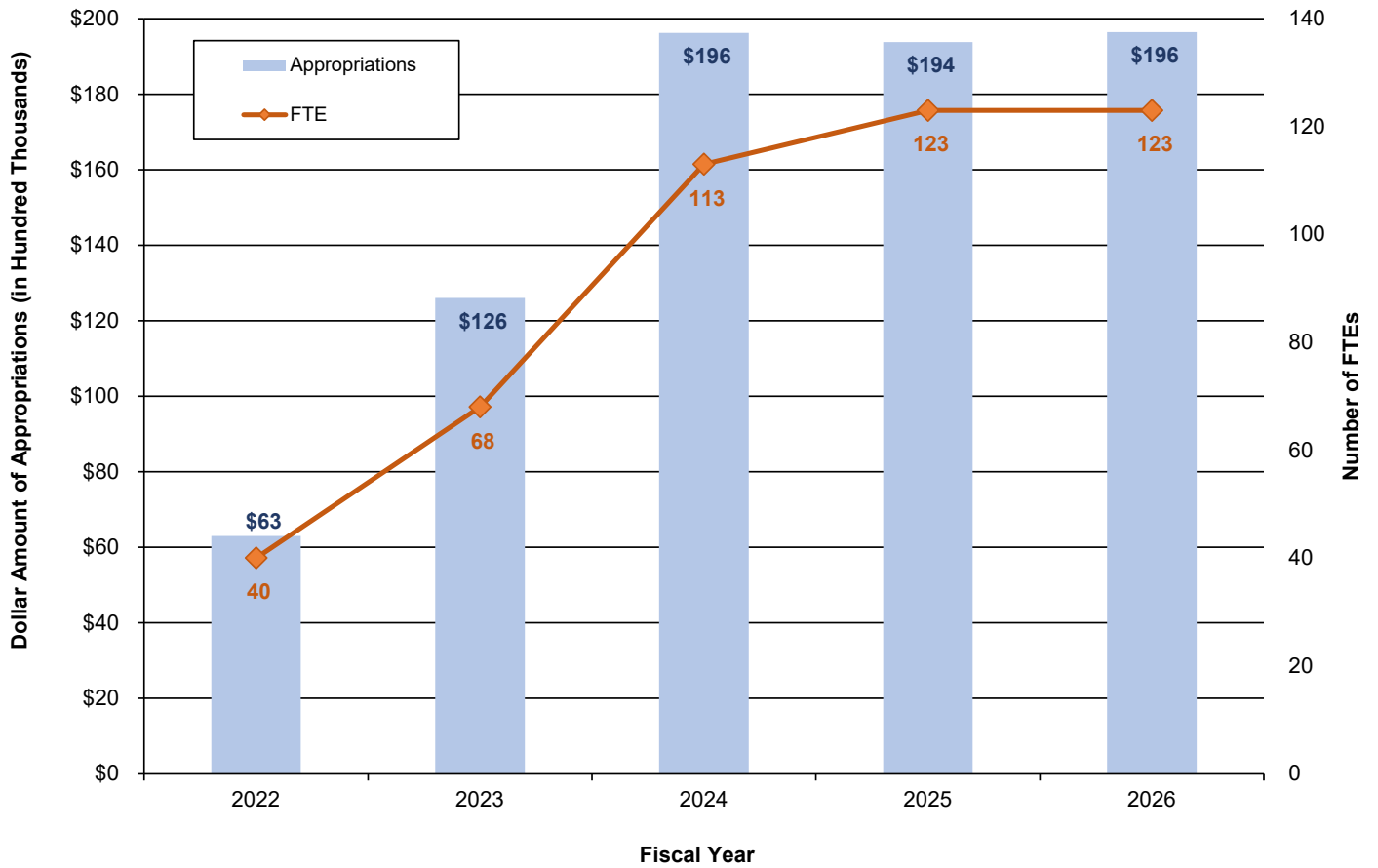
# SUPPLEMENTAL INFORMATION

UNAUDITED

## SELECTED ACTIVITIES RELATED TO INVESTIGATION TIMELINESS AND COMPLAINT INTAKE

Michigan Department of Civil Rights

Complaint Investigation and Enforcement Appropriations and FTEs by Fiscal Year  
Fiscal Years 2022 Through 2026



Source: The OAG prepared this exhibit with information from Public Acts 87 of 2021, 166 of 2022, 119 of 2023, 121 of 2024, and 22 of 2025.

## FOLLOW-UP METHODOLOGY AND PERIOD

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### METHODOLOGY

We conducted interviews with MDCR management and staff, reviewed MDCR's corrective action plan and applicable MDCR policies and procedures, and reviewed relevant documentation and data related to complaint investigations. Specifically, we:

- Interviewed MDCR management to obtain an understanding of MDCR's procedures to provide staff training.
- Evaluated employee training records for fiscal year 2025 to determine if employees met MDCR's 16-hour training requirement.
- Gained an understanding of management's procedures to monitor for timely completion of civil rights investigations.
- Obtained and reviewed tracking documents civil rights managers use to monitor investigation complaint activities.
- Reviewed MDCR's complaint and enforcement appropriation line item and one-time appropriations for fiscal years 2022 through 2026.
- Examined employee data for individuals MDCR hired between July 1, 2022 and January 31, 2026 to determine the number of employees hired, how long the employees had been with MDCR, and the new employee turnover rate.
- Analyzed CRIS data for the 10,207 civil rights complaints received from January 1, 2025 through January 31, 2026 and:
  - Calculated the average number of days for MDCR to complete civil rights investigations.
  - Determined the closure reason for completed investigations.
  - Calculated the average number of days ongoing investigations had been open as of February 11, 2026.
- Judgmentally sampled the 10 longest ongoing complaint investigations opened after January 1, 2025 to determine:
  - If the investigations had significant time periods with no evidence of MDCR actively investigating the complaint.

- The timeliness of the complaint assignment to an investigator and the investigator's initial contact for an interview.

**PERIOD**

Our follow-up generally covered activities from January 2025 through January 2026.

## **GLOSSARY OF ABBREVIATIONS AND TERMS**

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<b>claimant</b>	Any person who files a complaint or applies to the department for the issuance of a charge.
<b>complaint</b>	What a claimant alleges. A complaint is accepted when it is received by MDCR.
<b>CRIS</b>	Civil Rights Information System.
<b>FTE</b>	full-time equated.
<b>goal</b>	An intended outcome of a program or an entity to accomplish its mission.
<b>material condition</b>	A matter, in the auditor's judgment, which is more severe than a reportable condition and could impair the ability of management to operate a program in an effective and efficient manner and/or could adversely affect the judgment of an interested person concerning the effectiveness and efficiency of the program. Our assessment of materiality is in relation to the respective audit objective.
<b>MDCR</b>	Michigan Department of Civil Rights.
<b>performance audit</b>	An audit which provides findings or conclusions based on an evaluation of sufficient, appropriate evidence against criteria. Performance audits provide objective analysis to assist management and those charged with governance and oversight in using the information to improve program performance and operations, reduce costs, facilitate decision-making by parties with responsibility to oversee or initiate corrective action, and contribute to public accountability.
<b>respondent</b>	Any person against whom the claimant has complained.









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