
The Big 4 NYC Compliance Benchmark Report

AI Hiring Bias in Professional Services Job Descriptions — New York City

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Methodology: ALS Consulting JD Analyzer — Employer Compliance Tier

Jurisdiction: New York City — NYC Local Law 144, EEOC, ADEA, ADA

This report does not identify firms by name within findings. The analysis is based on publicly available job postings. The purpose is not to assign blame — it is to demonstrate that compliance gaps in job description language are systemic, normalized, and present even in organizations that advise others on compliance. All findings are factual, documented, and reproducible.

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EXECUTIVE SUMMARY

Four Firms. Four Postings. Zero Clean Audits.

In April 2026, ALS Consulting ran the publicly available New York City job postings of four global professional services firms — commonly known as the Big 4 — through our JD Analyzer compliance platform. These firms are among the largest sellers of AI governance, HR technology consulting, and compliance advisory services in the world. Their combined annual revenue exceeds \$200 billion. Their clients include the majority of the Fortune 500.

Every single posting contained compliance violations. Not one passed a basic audit against NYC Local Law 144, EEOC disparate impact standards, and federal employment discrimination law.

Benchmark Scorecard

| FIRM | PRACTICE AREA | OVERALL RISK | HIGH RISK FLAGS | LL144 VIOLATION |
|--------|-----------------------|--------------|-----------------|-------------------------------|
| Firm A | Government & Defense | HIGH RISK | 2 | YES — No AEDT Disclosure |
| Firm B | Financial Advisory | MEDIUM RISK | 1 | YES — Pay Transparency |
| Firm C | Risk & Assurance | MEDIUM RISK | 0 | NO — Not Triggered |
| Firm D | Technology Consulting | HIGH RISK | 2 | YES — Incomplete Requirements |

Key Findings at a Glance

- 2 of 4 firms scored HIGH RISK — the highest severity classification
- 2 of 4 firms scored MEDIUM RISK — compliance gaps present across every posting
- 3 of 4 firms triggered LL144-specific violations
- 4 of 4 firms had incomplete or truncated postings — a standalone compliance risk
- 4 of 4 firms had degree requirement issues creating potential disparate impact
- 0 of 4 firms included AEDT disclosure language required for NYC hiring
- National origin, citizenship, and age discrimination flags appeared across multiple firms

The Headline Finding: The firms advising Fortune 500 companies on AI governance, HR technology compliance, and regulatory risk cannot pass a basic compliance audit of their own job descriptions posted in the most regulated hiring jurisdiction in the United States. This is not an indictment of individual firms. It is evidence that compliance gaps in job description language are systemic — normalized across even the most sophisticated professional services organizations in the world.

METHODOLOGY

How This Analysis Was Conducted

All job postings analyzed in this report were publicly available on major job boards at the time of analysis. Postings were selected from New York City area roles posted by four global professional services firms in April 2026. No proprietary systems were accessed. No confidential information was used.

Each posting was submitted to the ALS Consulting JD Analyzer — Employer Compliance Tier. The analyzer evaluates job descriptions across six bias categories using a jurisdiction-specific compliance framework mapped to the following regulatory standards:

- NYC Local Law 144 (AEDT disclosure, bias audit requirements, candidate notification)
- EEOC Title VII — Disparate impact doctrine (Griggs v. Duke Power Co., 1971)
- Age Discrimination in Employment Act (ADEA) — Workers 40+
- Americans with Disabilities Act (ADA) — Essential function requirements
- EEOC Uniform Guidelines on Employee Selection Procedures
- NYC Pay Transparency Law — Salary range disclosure requirements

The Six Analysis Categories

Gender-Coded Language — Terms that signal preference for masculine or feminine behavioral norms

Age-Coded Language — Terms that signal preference for younger workers or penalize career experience

Race & National Origin Bias — Terms that create disparate impact based on race, ethnicity, or national origin

Disability Exclusion Language — Requirements not tied to essential job functions without ADA justification

Citizenship & Authorization — Language that screens beyond legal permissibility under immigration law

Jurisdiction Compliance Triggers — Missing disclosures, incomplete postings, pay transparency violations

Risk levels are assigned as HIGH RISK, MEDIUM RISK, or LOW RISK based on documented legal exposure, active enforcement patterns, and litigation precedent. HIGH RISK findings reflect documented EEOC complaint patterns, active litigation, or direct regulatory violations. MEDIUM RISK findings reflect established disparate impact evidence. LOW RISK findings reflect context-dependent exposure.

This report is provided for educational and compliance awareness purposes. Nothing herein constitutes legal advice. Employers should consult qualified employment counsel for jurisdiction-specific guidance.

FIRM A ANALYSIS

Firm A — Global Professional Services

HIGH RISK

Government & Defense Practice | New York City

This posting scored HIGH RISK — the most severe classification in our compliance framework. The posting contains two HIGH RISK flags and one MEDIUM RISK flag, with the most significant finding being a complete absence of required LL144 AI bias disclosure language on a posting from a firm that actively sells AI governance consulting services.

Security Clearance Discrimination

HIGH RISK

Security clearance requirements can create disparate impact against protected classes, particularly based on national origin, as non-U.S. citizens cannot obtain clearances. The posting includes no bona fide occupational requirement disclaimer or federal contract obligation language to justify this requirement.

Flagged: "Active Top Secret security clearance"

Correction: Add language clarifying this is a bona fide occupational requirement due to federal contract obligations and ensure the requirement is job-related and consistent with business necessity under EEOC Uniform Guidelines.

AI Bias Disclosure — LL144 Violation

HIGH RISK

NYC Local Law 144 requires employers to disclose the use of Automated Employment Decision Tools (AEDTs) in hiring. This posting contains no mention of automated employment decision tools or AI usage in the hiring process — a direct violation of LL144 disclosure requirements for NYC postings.

Flagged: "No mention of automated employment decision tools or AI usage in hiring process"

Correction: Add required LL144 disclosure statement including: notice of AEDT use, bias audit summary link, and candidate notification at least 10 business days before AEDT evaluation occurs.

Work Authorization Language

MEDIUM
RISK

The posting includes work authorization language that may discourage qualified candidates based on national origin or citizenship status beyond what is legally permissible under EEOC guidance.

Flagged: "Must be legally authorized to work in the United States without the need for employer sponsorship, now or at any time in the future"

Correction: Revise to standard language: 'Must be legally authorized to work in the United States' and remove future sponsorship prohibition unless specifically required for the security clearance.

Firm A Notable Finding: A firm that generates significant revenue from AI governance and compliance consulting does not include required LL144 AEDT disclosure language on its own New York City job postings. The same compliance standard they sell to clients is absent from their own hiring infrastructure.

FIRM B ANALYSIS

Firm B — Global Professional Services

MEDIUM
RISK

Financial Advisory Practice | New York City

This posting scored MEDIUM RISK overall but contains one HIGH RISK finding — a salary range that spans 202% of the base salary, triggering NYC pay transparency compliance concerns under Local Law 144. The posting also demonstrates the industry-wide pattern of truncated postings and degree requirement issues.

NYC Local Law 144 — Pay Transparency Violation

HIGH RISK

The salary range posted spans over 202% — from \$125,590 to \$253,690. NYC pay transparency requirements are designed to ensure meaningful salary disclosure. A range spanning more than double the base salary provides candidates with no actionable compensation information and may indicate potential pay discrimination or lack of transparency in compensation structure.

Flagged: "\$125,590 - \$253,690 a year"

Correction: Narrow the salary range to reflect specific compensation bands based on experience levels or certifications. Consider posting separate ranges for different experience tiers to provide meaningful transparency.

Educational Requirements Bias

MEDIUM
RISK

Strict degree requirements may disproportionately exclude candidates from underrepresented groups who may have equivalent skills through alternative pathways. Under EEOC guidance, degree requirements must be demonstrably related to job performance and consistent with business necessity.

Flagged: "Bachelor's degree in accounting, finance, economics, or business from an accredited college/university"

Correction: Add 'or equivalent combination of education and experience' language, or provide documented justification for why the degree is a business necessity for this role.

Experience Specificity — Career Gap Exposure

LOW RISK

The term 'recent experience' is vague and could be interpreted subjectively, potentially disadvantaging candidates with career gaps including disability leave, caregiving, or other protected interruptions.

Flagged: "Minimum five years of recent experience utilizing quantitative and qualitative best practices"

Correction: Define what constitutes 'recent' — e.g., 'within the last 7 years' — or remove the qualifier if recency is not a genuine business requirement.

Firm B Notable Finding: A salary range spanning \$128,100 — more than double the base salary — provides no meaningful pay transparency for NYC candidates. NYC pay transparency requirements exist precisely to prevent this type of disclosure theater. Publishing a range this broad is functionally equivalent to publishing no range at all.

FIRM C ANALYSIS

Firm C — Global Professional Services

**MEDIUM
RISK**

Risk & Assurance Practice | New York City

This posting scored MEDIUM RISK with three MEDIUM RISK findings. The most significant pattern here is the combination of educational gatekeeping, professional licensing barriers, and vague competency language — all of which compound to create intersectional disparate impact affecting candidates from underrepresented racial, socioeconomic, and international backgrounds simultaneously.

Educational Requirements Bias

**MEDIUM
RISK**

Strict degree requirements may disproportionately exclude candidates from underrepresented groups who may have equivalent skills through alternative pathways. In New York City — where first-generation college attendance rates vary significantly by race and socioeconomic background — rigid degree requirements compound existing systemic inequities.

Flagged: *"Bachelor's degree and approximately 4 years of related work experience; or a master's degree and approximately 3 years of related work experience"*

Correction: Replace with 'Bachelor's degree and 4+ years experience, OR equivalent combination of education and experience' to enable skills-based evaluation aligned with EEOC guidance.

Professional Licensing Bias

**MEDIUM
RISK**

Professional licensing requirements can create barriers for candidates from certain socioeconomic backgrounds or those educated internationally. In a city where 37% of the workforce is foreign-born, licensing requirements that do not account for international equivalents create documented disparate impact.

Flagged: *"Approved technical certification, CPA license or membership to state Bar or progress to attaining those mentioned"*

Correction: Clarify whether these are truly required or preferred, and add 'or equivalent professional qualification recognized in candidate's jurisdiction of education' to remove international barriers where not job-essential.

Vague Competency Language

MEDIUM
RISK

Subjective terms like 'excellent' without specific, measurable criteria enable biased evaluations based on interviewer preference rather than job-related assessment. Under EEOC Uniform Guidelines, selection criteria must be demonstrably related to job performance.

Flagged: *"Excellent managerial, leadership, organizational, and verbal/written communication skills"*

Correction: Define specific, measurable criteria — e.g., 'Demonstrated experience leading teams of 5+ people' or 'Proven ability to communicate complex findings to non-technical audiences' — rather than subjective descriptors.

Firm C Notable Finding: The combination of strict educational requirements, professional licensing barriers, and vague subjective competency language creates intersectional disparate impact — each criterion individually presents MEDIUM RISK, but together they systematically disadvantage candidates who are foreign-born, first-generation, or from lower socioeconomic backgrounds. In NYC, that is not a hypothetical population. It is the majority of the candidate pool.

FIRM D ANALYSIS

Firm D — Global Professional Services

HIGH RISK

Technology Consulting Practice | New York City

This posting scored HIGH RISK with two HIGH RISK findings and two MEDIUM RISK findings. The posting is particularly notable because it comes from a technology consulting practice — a group that actively advises clients on AI implementation and digital transformation — yet contains age discrimination signals, citizenship discrimination flags, and an incomplete requirements section that itself constitutes a HIGH RISK compliance finding.

Citizenship Discrimination — Restrictive Degree Requirements

HIGH RISK

The posting lists nine highly specific degree fields with no equivalent experience pathway, creating documented disparate impact against candidates from underrepresented groups. The specificity of the degree list functions as a credential screen that correlates with national origin, socioeconomic background, and race.

Flagged: *"What You Must Have - Bachelor's Degree in Accounting, Finance, Management Information Systems, Management Information Systems & Accounting, Computer and Information Science..."*

Correction: Broaden degree requirements to include 'or related field' and add 'or equivalent combination of education and experience.' Document the business necessity for each specific field listed if retained.

Incomplete Requirements — HIGH RISK Compliance Gap

HIGH RISK

The requirements section is truncated, creating unclear and potentially discriminatory hiring criteria. Under EEOC Uniform Guidelines, employers must be able to demonstrate that selection criteria are job-related. Truncated criteria cannot be validated as job-related and create inconsistent — and therefore potentially biased — evaluation standards.

Flagged: *"What You Must Have - Bachelor's Degree in Accounting, Finance, Management Information Systems... Business Ad"*

Correction: Complete the requirements section. Ensure all criteria are fully stated, job-related, and can withstand scrutiny under EEOC Uniform Guidelines.

Age/Experience Discrimination — ADEA Signal

MEDIUM
RISK

Language suggesting preference for workers at an early career stage — 'with your growing knowledge' — signals preference for less experienced, and therefore statistically younger, candidates. Under the ADEA, language that implies preference for workers based on their career stage creates age discrimination exposure for candidates 40 and older.

Flagged: *"With your growing knowledge of how business works"*

Correction: Replace with 'Leveraging your business knowledge' or 'Drawing on your business acumen' — language that does not imply career stage preference.

Firm D Notable Finding: A technology consulting practice advising clients on AI implementation posts a job description with age discrimination signals, nine overly restrictive degree fields, and an incomplete requirements section that constitutes a standalone HIGH RISK compliance violation. The firms helping clients navigate AI governance have not applied that governance to their own talent acquisition processes.

CROSS-FIRM PATTERN ANALYSIS

What All Four Firms Have in Common

Across four firms, four postings, and four distinct practice areas, the following compliance gaps appeared consistently. These are not isolated errors. They are systemic patterns embedded in how professional services firms write job descriptions for the New York City market.

Pattern 1 — Every Posting Was Incomplete

All four postings contained truncated text — cut off mid-sentence. This is not a minor formatting issue. Incomplete postings create unclear hiring criteria that cannot be validated as job-related under EEOC Uniform Guidelines. Inconsistent criteria enable subjective — and therefore potentially biased — evaluation. This pattern suggests these firms are using ATS systems that truncate job description text before publishing, a technical compliance gap that their own technology consulting practices could diagnose and fix.

Pattern 2 — Degree Requirements Without Equivalent Experience Pathways

Every posting listed degree requirements. Not one included 'or equivalent combination of education and experience' language. This is the single most documented source of disparate impact in hiring — particularly for Black, Latino, and first-generation candidates who are statistically less likely to hold traditional four-year degrees regardless of demonstrated competency. NYC's candidate pool is among the most educationally diverse in the world. Rigid degree requirements filter against that diversity without documented business necessity.

Pattern 3 — Zero LL144 AEDT Disclosure

Not one of the four postings included required disclosure language under NYC Local Law 144. If these firms use any automated employment decision tools — ATS ranking, resume scoring, AI screening — in their NYC hiring processes, they are in violation of LL144 disclosure requirements. Given that all four firms actively sell AI-enabled talent solutions and HR technology consulting, the absence of AEDT disclosure is particularly significant.

Pattern 4 — National Origin and Citizenship Language

Three of four postings contained language that creates national origin or citizenship discrimination exposure — security clearance requirements without BFOQ disclaimers, overly restrictive degree field lists, and professional licensing requirements without international equivalency pathways. In New York City, where 37% of the workforce is foreign-born, these patterns create measurable disparate impact on a protected class.

Pattern 5 — Medium Risk Is the Industry Standard

The most important finding in this report is not the HIGH RISK scores — it is the consistency of MEDIUM RISK findings across every posting. Medium risk is not a passing grade. It is documented exposure that compounds over time. Across thousands of annual job postings from these four firms, medium risk findings produce systemic disparate impact at scale — even without a single HIGH RISK flag.

IMPLICATIONS FOR HR TECHNOLOGY VENDORS

Why This Matters Beyond Professional Services

The Big 4 findings are significant not just because of who these firms are — but because of what they represent. If the world's most sophisticated compliance advisors have systemic gaps in their own job descriptions, the mid-market employers they advise, and the ATS vendors those employers use, face the same exposure at scale.

Every ATS platform. Every AI screening tool. Every hiring intelligence platform. They all ingest job descriptions as their primary input. The bias documented in this report does not begin with the algorithm. It begins with the job description — before the AI ever runs.

The Vendor Liability Chain

Under current EEOC guidance and active litigation — including *Mobley v. Workday* — employers are liable for disparate impact produced by vendor AI tools. But the analysis must go further: vendors whose platforms ingest biased job descriptions and amplify that bias through algorithmic screening face their own exposure under LL144, the EU AI Act, and emerging state-level AI regulations.

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|--|---|
| | Job description language is your primary input. Bias at the input level produces biased outputs at scale. Your annual LL144 audit will surface this. Build upstream JD compliance analysis into your platform before the audit requires you to. |
| | Training data derived from biased historical hiring decisions encoded in biased job descriptions creates compounding disparate impact. Your platform inherits the bias of the JD it was trained on. |
| | The firms implementing your recommended platforms are posting non-compliant job descriptions. Your implementation is not complete until the inputs feeding those systems are audited. |
| | If your platform uses job description criteria to evaluate candidates, you inherit the compliance gaps in those criteria. FCRA and EEOC exposure applies to your outputs. |

RECOMMENDATIONS

What Employers and Vendors Must Do

For Employers — Immediate Actions

1. Audit your active job description library

Every active posting should be reviewed against a jurisdiction-specific compliance framework. This is not a one-time exercise — it must be repeated every time a posting is updated and whenever regulatory guidance changes.

2. Add LL144 AEDT disclosure language to all NYC postings

If you use any automated employment decision tool in your NYC hiring process — including ATS ranking — you are required to disclose it. Add the disclosure now. The penalty clock starts with the first non-compliant posting.

3. Replace rigid degree requirements with skills-based language

Add 'or equivalent combination of education and experience' to every degree requirement that cannot be documented as a business necessity. This is the single highest-impact change you can make to reduce disparate impact exposure.

4. Complete every posting before publishing

Truncated postings are an independent compliance risk. Implement a review workflow that verifies every posting is complete before it reaches a job board.

5. Narrow salary ranges to provide meaningful transparency

A salary range spanning more than 50% of the base salary does not satisfy the spirit of NYC pay transparency requirements. Provide specific bands by experience tier.

For HR Technology Vendors — Platform Requirements

1. Build JD compliance analysis into your intake layer

Before a job description feeds your screening algorithm, analyze it for bias. The findings in this report are upstream of your platform — but your platform amplifies them. Build the upstream filter.

2. Implement jurisdiction-specific compliance triggers

LL144, Colorado SB205, Illinois AIVIA, California AB 2930, and EU AI Act have different requirements. Your platform must map job description language to the specific jurisdiction it operates in.

3. Conduct annual independent bias audits

LL144 requires it. EU AI Act requires it. Your clients' legal counsel will require it before signing your contract. Build the audit infrastructure before the requirement catches up to you.

4. Document your AEDT disclosure infrastructure

Can you demonstrate that candidate notification went out 10 business days before AEDT evaluation? Can you produce that documentation in a regulatory inquiry? If not, build it now.

5. Engage an independent compliance methodology partner

Your internal audit is not independent. LL144 requires impartial third-party review. Build the independent audit relationship before your first NYC enterprise client asks for proof.

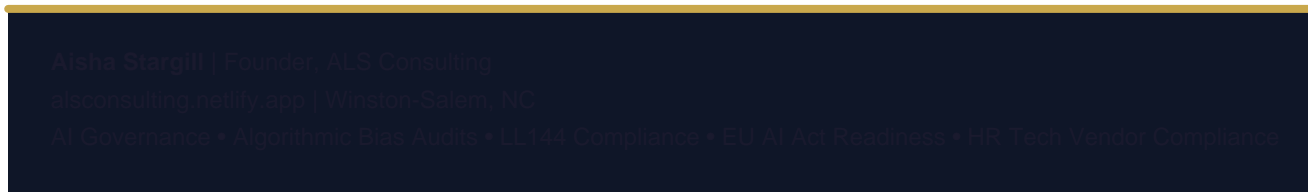
ABOUT ALS CONSULTING

Our Methodology and Services

ALS Consulting is an AI governance and HR compliance consultancy based in Winston-Salem, North Carolina, founded by Aisha Stargill. With 15+ years of HR leadership experience across manufacturing, government, and nonprofit sectors, ALS Consulting specializes in algorithmic bias audits, NYC Local Law 144 compliance, EU AI Act readiness assessments, and HR technology governance for mid-market employers and HR technology vendors.

Services

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|--|---|---|
| JD Analyzer — Employer Tier | \$97/report or \$397/month unlimited | Full 6-category bias analysis with jurisdiction-specific compliance triggers, EEOC exposure scoring, remediation suggestions, and branded PDF report. |
| JD Analyzer — Candidate Tier | Free first report \$9.99/report | Resume vs. JD gap analysis showing exactly where candidate language doesn't match ATS requirements and how to close the gap before applying. |
| Algorithmic Bias Audit — Standard | \$12,500 | Comprehensive bias analysis, disparate impact testing, findings report, and compliance status assessment. |
| Algorithmic Bias Audit — Enterprise | \$18,500 | Full audit plus proxy discrimination deep-dive, preliminary remediation roadmap, and 30-day follow-up. |
| Vendor Compliance Framework | Starting at \$4,500 | Jurisdiction-specific compliance layer design, methodology validation, and white label compliance infrastructure for HR technology vendors. |
| Advisory Retainer | \$2,500 — \$5,000/month | Ongoing compliance monitoring, regulatory update integration, and documentation support. |



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