



OFFICE OF INDEPENDENT INTERNAL AUDIT LAVOIS CAMPBELL, INTERIM CHIEF AUDIT EXECUTIVE

May 17, 2022

Benita Ransom, Director Human Resources & Merit System 1300 Commerce Dr. Decatur, GA 30030

### RE: Follow-up Report on the Status of the Employee File Management Process Audit - Report Number 2018-006 HRMS

Dear Director Ransom:

As required by DeKalb County, Georgia – Code of Ordinances/Organizational Act Section 10A – Independent Internal Audit (I), the Office of Independent Internal Audit has completed a follow-up of the audit noted above. This follow-up focused on the status of the implementation of action plans; the effectiveness of actions taken may be assessed in future audits. The table below outlines the Office of Independent Internal Audit's assessment of the status of actions taken by your office to address the findings contained in the audit report referenced above.

## **Status of Audit Findings**

Based on our review of management responses to the findings, we concluded that:

| # | Report Finding   | Management Action<br>Plan Status |
|---|--|----------------------------------|
| 1 | Employee File Management And Maintenance Procedures Need Improvement | Closed                           |
| 2 | Employee File And Maintenance Training Not Performed                 | Partially Complete               |

Please contact me if you require additional information.

Sincerely,

Lavois M. Campbell

Lavois Campbell, CIÁ, CISA, CFE, CGA-CPA Interim Chief Audit Executive Office of Independent Internal Audit





### Attachment

Cc: Catrina A. Rives, Human Resources Manager Michael L. Thurmond, Chief Executive Officer Robert Patrick, Board of Commissioners District 1 Jeff Rader, Board of Commissioners District 2 Larry Johnson, Board of Commissioners District 3 Steve Bradshaw, Board of Commissioners District 4 Mereda Davis Johnson, Board of Commissioners District 5 Ted Terry, Board of Commissioners District 6 Lorraine Cochran-Johnson, Board of Commissioners District 7 Zachary L. Williams, Chief Operating Officer/Executive Assistant La'Keitha D. Carlos, Chief of Staff Kwasi K. Obeng, Chief of Staff, Board of Commissioners Adrienne T. McMillion, Chairperson, Audit Oversight Committee Harold Smith, Jr., Vice-Chairperson, Audit Oversight Committee Claire Cousins, Chairperson pro tem, Audit Oversight Committee Lisa Earls, Audit Oversight Committee Tanja Christine Boyd-Witherspoon, Audit Oversight Committee

#### Information Distribution:

Zachary L. Williams, Chief Operating Officer/ Executive Assistant Vivian Ernstes, County Attorney La'Keitha D. Carlos, CEO's Chief of Staff Kwasi K. Obeng, Chief of Staff, Board of Commissioners LaTonya N Wiley, Interim Ethics Officer, DeKalb Board of Ethics





# **OFFICE OF INDEPENDENT INTERNAL AUDIT**

LAVOIS CAMPBELL, INTERIM CHIEF AUDIT EXECUTIVE

| Dekalb County Government |   |   |  |  |  |     |  |  |  |
|--------------------------|---|---|--|--|--|-----|--|--|--|
|                          | Office of Independent Internal Audit      |   |  |  |  |     |  |  |  |
| Da                       | Date: May 17, 2022Prepared by: Kesha Hall |   |  |  |  |     |  |  |  |
|                          |   |   | Audit Fine   | dings Status   | s Status Update Form   |     |  |  |  |
| Status Date              |   | Report # Report Title   |  |  |  |     |  |  |  |
| 5/17/22                  |   | 2018-006-HRMS   |  | Audit of Employee File Management Process  |  |     |  |  |  |
| Contact Person           |   | Title<br>Director of Human Resources  |  | Phone No.         Email Address           (404) 687-3588         bcransom@dekalbcountyga.gov |  |     |  |  |  |
|                          | Benita Ransom Activity                    |   | Accountability   |  | Schedule   |     |  |  |  |
|                          |   | Responsible Area  |  | Repeat Finding   | Anticipated Completion Date/Date Adjustments<br>will be made |     |  |  |  |
|                          | Human Resources                           |   | Human Resources Information Systems<br>Division (HRIS)   |  | No   | N/A |  |  |  |
|                          | F   | inding  | EMPLOYEE FILE MANAGEMENT AND MAINTENANCE PROCEDURES NEED IMPROVEMENT   |  |  |     |  |  |  |
|                          | No.                                       | 1   |  |  |  |     |  |  |  |
|                          | Date                                      | 9/24/20   |  | 0  | la manata di setta di setta di                               |     |  |  |  |
| Recommendation           |   | We recommend HRMS management implement periodic training related to regulations and guidelines for managing employee information and records. In addition, we recommend that HRMS maintain evidence that employees have attended the training. Further, we recommend that HRMS document acknowledgment of County departmental administrative and HRMS staffs' understanding of the requirements for handling employee   |  |  |  |     |  |  |  |
| HRMS Management Response |   | <ul> <li>HR Improvements in Process</li> <li>1 Update the SOP for processing personnel actions, which contains the procedures for creating new-hire files. The updates will reflect the level of specificity recommended by OIIA to include: a list of required forms for each type of hire (e.g. regular, time-limited, non-merit, and temporary, etc.), and a link to access fillable forms online. To be completed by October 30, 2020</li> <li>2 Revise 'New Hire Checklist' to mirror updates reflected in Processing Personnel Actions SOP for each type of new hire. To be completed by October 30, 2020</li> <li>3 Modify procedures in Generalist Division SOP to ensure new hire packets from non-merit departments also include all required documents. To be completed by October 30, 2020</li> <li>4 Encourage non-merit departments not currently utilizing Taleo onboarding to do so to ensure all pertinent new hire documents are appropriately completed and obtained. Non-merit departments not under the purview of the CEO are not required to adhere to procedures governed by the CEO. Ongoing.</li> <li>5 Insert the following language in HR SOPs: Employees entrusted with personnel data as part of their job responsibility must treat information in a manner consistent with the Georgia Open Records Act and HR Confidentiality Agreement. To be completed by October 30, 2020</li> <li>6 Update File Management SOP to include process for record retention and disposal of files. HR follows the State of Georgia record retention schedule and SHRM best practices for maintaining employee files. To be completed by October 30, 2020</li> <li>7 Continue to train HR and department staff on SOP updates, new processes, laws and regulations. Ongoing</li> <li>8 Draft confidentiality agreement for department coordinators acknowledging personnel files may contain sensitive information and access should be strictly controlled. To be completed by November 30, 2020.</li> <li>• Review twice a year</li> </ul> |  |  |  |     |  |  |  |
| St                       | atus Update M                             | anagement Response  | <ol> <li>SOP 5.1 – PROCESS PERSONNEL ACTIONS FOR EMPLOYEES updated with link to new hire checklist<br/>and required forms. All hires are now processed online via Oracle CV360 Journeys.</li> </ol>  |  |  |     |  |  |  |
|                          | Open                                      |   | <ol> <li>2) New Hire Checklist updated and posted on HR's Intranet Forms page.</li> <li>3) SOP 5.1 – PROCESS PERSONNEL ACTIONS FOR EMPLOYEES provides list of required new hire documents for general and other hire types (If applicable) Non- Merit, Interim, Time-limited, Job Sharing.</li> <li>4) As of January 17, 2022 ALL departments are required to use CV360 for all personnel transactions, as such</li> </ol> |  |  |     |  |  |  |
|                          | Management/Ag                             | gency Assumes Risk  |  |  |  |     |  |  |  |
|                          | Partially Complete                        |   | all county hires are processed electronically through CV360.<br>5) SOP 2.1 – OPEN RECORDS AND REQUEST FOR EMPLOYEE FILE was updated to include The State of<br>Georgia official records retention schedule established for local governments and county's destruction process.   |  |  |     |  |  |  |
|                          | Complete Pend                             | ng Verification by OIIA   | <ul><li>6) "Entrusted" language inserted in every HR SOP.</li><li>7) HR continuously trains staff on changes in process and policies. With the implementation of CV360, training</li></ul>   |  |  |     |  |  |  |
| x                        | Closed                                    |   | is a critical priority for HR and end-users county-wide.<br>8) Confidentiality agreement distributed March 2021 to end-users with Taleo and PeopleSoft access.   |  |  |     |  |  |  |





# OFFICE OF INDEPENDENT INTERNAL AUDIT

LAVOIS CAMPBELL, INTERIM CHIEF AUDIT EXECUTIVE

| Dekalb County Government             |                           |   |                   |                    |  |  |  |  |  |  |
|--------------------------------------|---------------------------|---|-------------------|--------------------|--|--|--|--|--|--|
| Office of Independent Internal Audit |                           |   |                   |                    |  |  |  |  |  |  |
| Date: May 1                          | 7, 2022                   |   |                   |                    | Prepared by: Kesha Hall                                      |  |  |  |  |  |
|                                      |                           | Audit Fine  | dings Status I    | Update Form        |  |  |  |  |  |  |
|                                      | atus Date                 | Report # Report Title   |                   |                    |  |  |  |  |  |  |
|                                      | 5/17/22                   | 2018-006-HRMS Audit of Employee File Management Process   |                   |                    |  |  |  |  |  |  |
| Contact Person                       |                           | Title   |                   | Phone No.          | Email Address  |  |  |  |  |  |
| -                                    | ita Ransom<br>Activity    | Director of Human Resources   |                   | (404) 687-3588     | bcransom@dekalbcountvga.gov<br>Schedule                      |  |  |  |  |  |
| Human Resources                      |                           | Accountability Responsible Area   |                   | Repeat Finding     | Anticipated Completion Date/Date Adjustments<br>will be made |  |  |  |  |  |
|                                      |                           | Human Resources Information Systems<br>Division (HRIS)  |                   | No                 | 7/31/22  |  |  |  |  |  |
|                                      | Finding                   | EMPLOYEE FILE MANAGEMENT AND MAINTENANCE TRAINING NOT   |                   |                    |  |  |  |  |  |  |
| No.                                  | 2                         | PERFORMED   |                   |                    |  |  |  |  |  |  |
| Date                                 | 9/24/20                   | We recommend that   | nonogoment undete | their policies and | procedures (SOP) to include the following:                   |  |  |  |  |  |
| Recommendation                       |                           | The required documentation for the employee general file.<br>Copies of standard forms or templates to be used.<br>Procedures to ensure receipt of all documents from County departments.<br>Compliance with all applicable privacy laws and regulations.<br>File security, record retention, and disposal of files.<br>In addition, we recommend that HRMS provided additional training to its staff regarding these updated<br>procedures. Lastly, we recommend HRMS implement monitoring procedures to help ensure compliance with<br>updated policies and procedures.  |                   |                    |  |  |  |  |  |  |
| HRMS Mana                            | agement Response          | <ul> <li>HR Training Initiatives in Process</li> <li>While HR does not have oversight responsibility for maintenance and security of employee records at the department level, HR agrees to do the following:</li> <li>1 Train department coordinators on proper maintenance and management of personnel files based on HR SOPs and confidentiality agreement. Training projected to be offered twice a year.</li> <li>2 Request and/or identify resources to send designated HR staff to HIPAA training. To be completed by October 30, 2020 for current employees; new hires within 60 days of hire; and as laws/regulations change.</li> </ul> |                   |                    |  |  |  |  |  |  |
| Status Update M                      | lanagement Response       | 1) HR presented Confidentiality Agreement & PII (personal identifiable information) and Other Sensitive   |                   |                    |  |  |  |  |  |  |
| Open                                 |                           | Information at 3/17/2021 Policy Council meeting. Confidentiality agreement form was distributed via email to Taleo and PeopleSoft users on April 1, 2021 and given a deadline of April 23, 2021. "Forms must be   |                   |                    |  |  |  |  |  |  |
| Management/                          | Agency Assumes Risk       | completed, signed and uploaded to HR's Document Management site on SharePoint. Failing to do so would result in suspension of system access." A new request for system access, must be submitted via IT help desk   |                   |                    |  |  |  |  |  |  |
| X Partially Comp                     | lete                      | ticket with completed form attached. CV360 access to HR modules is now granted by IT, upon HR's approval  |                   |                    |  |  |  |  |  |  |
| Complete Pen                         | ding Verification by OIIA | and submission of completed confidentiality is required before access is granted.<br>2) HR, along with Finance and IT are near finalizing HIPAA training. The first course will be instructor-led, and  |                   |                    |  |  |  |  |  |  |
| Closed                               |                           | subsequent courses will be offered in CV360 as self-paced learning. Course content pending review by IT and Law departments.  |                   |                    |  |  |  |  |  |  |