

Audit Report No. 2018-006-HRMS
September 2020

DEKALB COUNTY GOVERNMENT
Human Resources and Merit System
Department

FINAL REPORT



John L. Greene, CIA, CIG, CGAP, CGFM
Chief Audit Executive

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John Greene
Chief Audit Executive

HUMAN RESOURCES & MERIT SYSTEM DEPARTMENT AUDIT OF EMPLOYEE FILE MANAGEMENT PROCESS AUDIT REPORT NO. 2018-006-HRMS

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What We Did

In accordance with the Office of Independent Internal Audit's (OIIA) Annual Audit Plan, we conducted a performance audit of the employee file management process within DeKalb County's (County) Human Resources and Merit System (HRMS) Department. The audit period was January 1, 2017, through December 31, 2018.

The objectives of the audit were to assess the controls, policies, and procedures in place related to employee files, and to identify opportunities to strengthen the effectiveness and efficiency of the processes for maintaining employee files.

To accomplish the audit objectives, we interviewed HRMS staff and reviewed the HRMS department's policies and procedures to ensure proper controls were in place for the management and maintenance of employee files. In addition, we examined files and records to ensure that they were managed consistently and in compliance with policies and procedures and applicable laws.

What We Found

We found that HRMS management and maintenance procedures need improvement in the following areas:

- Files included sensitive and private employee information.
- Incomplete and outdated versions of forms.
- Missing new hire forms.
- Documents and forms in the wrong file.
- Check-out logs used to manage file security were not always completed.
- Check-out procedures were not always performed.
- Check-out logs were not reviewed periodically to ensure compliance with policies and procedures.
- Documentation to support retention and disposal of employee records did not exist.

In addition, with the exception of one employee who had HIPAA training in 2003, we were not able to identify any evidence of training for HRMS employees regarding employee file management and maintenance.

What We Recommend

We recommend that HRMS Management:

- Update the policies and procedures to include the following:
 - Required documentation for the employee general files.
 - Copies of standard forms and templates to be used.

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- Procedures to ensure receipt of all documents from County departments.
- Compliance with all applicable privacy laws and regulations.
- File security, record retention, and disposal of files.
- Implement additional training to its staff regarding these updated procedures.
- Implement monitoring procedures to help ensure compliance with updated policies and procedures.
- Implement periodic training related to regulations and guidelines for managing employee information and records.
- Maintain evidence that employees have attended the training.
- Document acknowledgment of County departmental administrative and HRMS staffs' understanding of the requirements for handling employee files.

Human Resources and Merit System Department Response

The Human Resources and Merit System Department provided a timely response on September 4, 2020. The Human Resources and Merit System Department Response to the Office of Independent Internal Audit 2018 Review of Employees Files with Human Resources Project # 2018-006-HRMS is **attached at the back of the report.**

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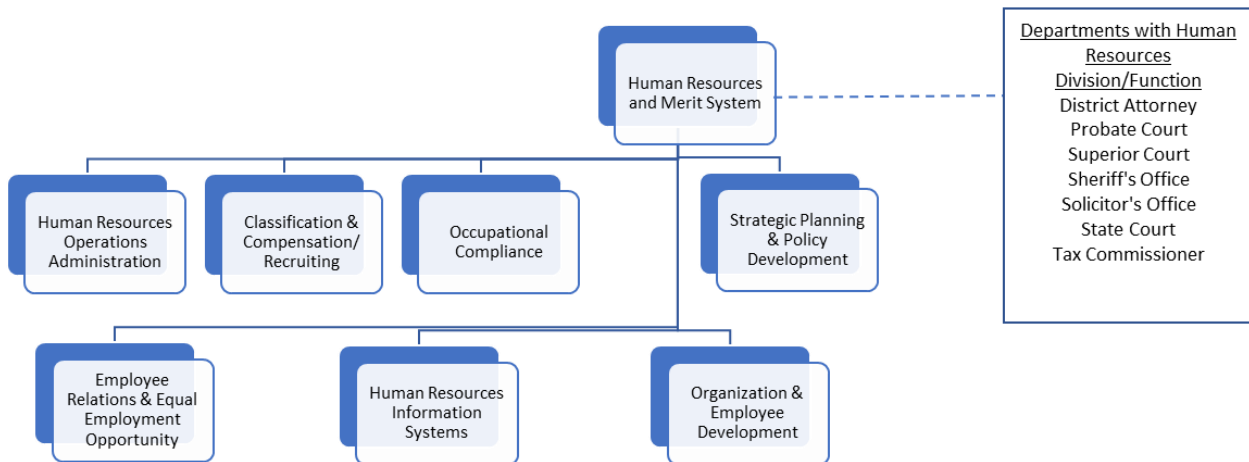
BACKGROUND AND INTRODUCTION

HRMS is comprised of the seven divisions outlined below. These divisions assist with, but are not limited to, sourcing and recruiting qualified applicants, maintaining the official employee records of County employees, administering leave plans, resolving conflicts between management and employees, addressing discriminatory practices, coordinating generalized health screenings and services for all applicants and employees, and comprehensive employee development and training. The Human Resources Information Systems division (HRIS) is primarily responsible for maintaining the official employee records of County employees.

HRMS is the custodian of all records and properties in the office of the Merit System Director. This includes maintaining the confidentiality of all DeKalb County merit system documents, records, and information as required by the Georgia Open Records Act or other applicable laws and rules.

HRMS provides management and oversight for employee files of 34 departments with approximately 6,500 employees within the DeKalb County Government. Some departments, listed in **Exhibit 1** below, have their own Human Resources division or function for recruitment.

HUMAN RESOURCES AND MERIT SYSTEM DIVISIONS EXHIBIT 1



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County departments with Human Resources managers that report to the program directors should also follow the County's Human Resources policies and procedures for employee file management. The dotted line, in Exhibit 1 above, displays that HRMS provides guidance to departments' Human Resources managers.

Employee onboarding for the County is a decentralized process. The hiring departments are the main contact for new hires. After the application and hiring approval, the hiring begins with new hires providing employment documents to the hiring department based on new hire packet documents. The new hire packet consists of employee benefits and payroll forms such as I-9, Conflict of Interest Affirmation, Drug and Alcohol Testing Policy Acknowledgement, Federal and State Tax withholding, direct deposit, and pension beneficiary forms.

The progress of the new hire process is tracked through the Taleo system (talent management system that includes applicant tracking and onboarding). The hiring department's administrative staff collects, copies, scans, and forwards new hire documents to HRMS for entry into the system. The process is completed manually. The documents are provided in person, or copied and sent through interoffice mail, or delivered to HRMS. Copies of all new hire documents are maintained by the hiring departments as well as HRMS. Some new hire documents, such as federal and state withholding forms, direct deposit, and pension beneficiary forms are forwarded to Finance-Risk Management and Employee Services (Payroll and Pension units). Once onboarding and orientation are completed, HRMS prepares and maintains employee files, where employment forms and documents are kept. In addition, the hiring departments may keep employee documents collected during the onboarding process.

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AUDIT RESULTS

We reviewed a sample of 120 employee general files, performed inquiries, and completed internal control questionnaires with HRMS staff regarding the management and maintenance of employee files. We observed that employee files are stored in a secure location, access to those files is restricted, and documented policies and procedures exist. In addition, we noted that not all of the employees handling employee file documentation reside in HRMS. The results of our sample testing are outlined below.

FINDING 1- EMPLOYEE FILE MANAGEMENT AND MAINTENANCE PROCEDURES NEED IMPROVEMENT

Objective: To determine if controls, policies, and procedures are in place for the maintenance of employee files and if those policies and procedures are in compliance with applicable laws and regulations.

Criteria: The Society for Human Resources Management recommends that general employee files only contain employee performance information and that a medical and confidential file containing protected, non-job related, or confidential records are maintained separately.

HRMS has established standardized and required forms to help ensure compliance with applicable employment laws and regulations.

Condition: During the audit, we met with HRMS and reviewed the procedures and processes for managing and maintaining employee general files. We also selected a sample of employees and reviewed their general files. Since HRMS did not have formal procedures regarding how employee files are managed and maintained, we used guidelines from the Society for Human Resources Management (SHRM) as the criteria for the review. The following list represented items noted in some of the files during that review.

- Sensitive and private employee information.
- Incomplete and outdated versions of forms.
- Missing new hire forms.
- Documents and forms in the wrong file.

In addition, our review of employee files noted that “Check-out logs” are used to manage the flow of file review within the department. The results of that review included the following:

- Check-out logs used to manage file security were not always completed.
- Check-out procedures were not always performed. For example, files were kept beyond the number of days allowed by policies and procedures.
- Check-out logs were not reviewed periodically to ensure compliance with policies and procedures.

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Further, our discussions with management and review of procedures and processes noted that documentation to support retention and disposal of employee records had not been formally prepared.

Cause: HRMS did not have formal operating procedures that specify which documents should be included in employee files (e.g. general, confidential, etc.). In addition, HRMS did not have a process to monitor procedures for compliance with the maintenance and security of employee records among County departments.

Consequence: Formal and documented guidelines and procedures help prevent inconsistent and improper handling of employee records. In addition, these procedures help ensure the County's compliance with federal, state, and other regulations or laws.

Recommendation: We recommend that management update their policies and procedures (SOP) to include the following:

- The required documentation for the employee general file.
- Copies of standard forms or templates to be used.
- Procedures to ensure receipt of all documents from County departments.
- Compliance with all applicable privacy laws and regulations.
- File security, record retention, and disposal of files.

In addition, we recommend that HRMS provided additional training to its staff regarding these updated procedures. Lastly, we recommend HRMS implement monitoring procedures to help ensure compliance with updated policies and procedures.

FINDING 2- EMPLOYEE FILE MANAGEMENT AND MAINTENANCE TRAINING NOT PERFORMED

Objective: To determine if controls, policies, and procedures are in place for the maintenance of employee files and if those policies and procedures are in compliance with applicable laws and regulations.

Criteria: The Federal Internal Control Standards advise that “training is aimed at developing and retaining employee knowledge, skills, and abilities to meet changing organizational needs.”¹ In addition, training should “enable individuals to develop competencies appropriate for key roles, reinforce standards of conduct, and tailor training based on the needs of the role.”²

In addition, most laws related to privacy requires that a covered entity train all members of its workforce on the policies and procedures with respect to protected health information as

¹ US Government Accountability Office, Standards for Internal Control in the Federal Government, GAO-14-704G (September 2014), pg. 46

² US Government Accountability Office, Standards for Internal Control in the Federal Government, GAO-14-704G (September 2014), pg. 31

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necessary and appropriate for the members of the workforce to carry out their functions within the covered entity.³

Condition: The new hire onboarding process is decentralized within County operations. The hiring department's administrative staff and other non-HRMS staff collect, process, and submit to HRMS required file documentation and forms. Some of these documents and forms contain sensitive data such as social security numbers (SSNs), I-9 forms, payroll, and banking information. However, limited written guidance for handling employee records had been provided to this staff. Moreover, HRMS had not performed countywide employee training for administrative staff that collects employee information and documents on behalf of HRMS.

In addition, with the exception of one employee who had HIPAA training in 2003, we were not able to identify any evidence of training for HRMS employees regarding employee file management and maintenance.

Cause: HRMS does not have direct responsibility for all employees handling employee file information.

Consequence: Training employees who handle employee information and records helps ensure that they will be handled consistently, in compliance with applicable privacy laws, and accordance with management's expectations.

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 files.

³ 45 Code of Federal Regulations. § 164.530 (2014)

APPENDIX

Appendix I – Purpose, Scope, and Methodology

Purpose

The purpose of the engagement was to:

- Determine whether proper controls, policies, and procedures are in place for the maintenance of employee files, and records are consistent with policies and procedures and in compliance with applicable laws and regulations.
- Identify opportunities to strengthen the effectiveness and efficiency of the processes for maintaining employee files.

Scope and Methodology:

The scope of this engagement was to examine documentation and information relative to the employee file management process for HRMS' merit and merit-exempt employees [excluding employees listed in DeKalb County Personnel code, Sec 20.4 (b) to (j)], from January 1, 2017, to December 31, 2018.

The methodology included, but was not limited to the following:

- Review HRMS' administrative procedures for maintaining DeKalb County employee records.
- Examine employees' files to assess compliance with HRMS' administrative procedures for employee file maintenance.
- Examine controls over the effectiveness and efficiency of procedures that ensure proper handling of employees' files.
- Interview appropriate staff and external parties.
- Review best practices to strengthen the effectiveness and efficiency of the processes for maintaining employee files.
- Review other applicable documentation.

Appendix II– Definitions and Abbreviations

Acronyms and Abbreviation

HIPAA Health Insurance Portability and Accountability Act

Key Definitions

Health Insurance Portability and Accountability Act: “The HIPAA Privacy Rule establishes national standards to protect individuals’ medical records and other personal health information and applies to health plans, health care clearinghouses, and those health care providers that conduct certain health care transactions electronically.”⁴

“Individuals, organizations, and agencies that meet the definition of a covered entity under HIPAA must comply with the Rules’ requirements to protect the privacy and security of health information and must provide individuals with certain rights with respect to their health information.”⁵

⁴ The HIPAA Privacy Rule, as of January 13, 2020, <https://www.hhs.gov/hipaa/for-professionals/privacy/index.html>

⁵ Covered Entities and Business Associates, as of January 13, 2020, <https://www.hhs.gov/hipaa/for-professionals/covered-entities/index.html>

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STATEMENT OF ACCORDANCE

Statement of Accordance

The mission of DeKalb County is to make the priorities of the citizens of DeKalb County; the priorities of County government - by achieving a safer DeKalb, building stronger neighborhoods, creating a fiscally accountable and more efficient county government and uniting the citizens of DeKalb County.

The mission of the Office of Independent Internal Audit is to provide independent, objective, insightful, nonpartisan assessment of the stewardship or performance of policies, programs and operations in promoting efficiency, effectiveness and integrity in DeKalb County.

This performance audit was prepared pursuant to DeKalb County, Georgia – Code Ordinances/Organizational Act Section 10A- Independent Internal Audit. 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 findings and conclusions based on our audit objectives.

This report is intended for the use of the agency to which it was disseminated and may contain information that is exempt from disclosure under applicable law. Do not release without prior coordination with the Office of Independent Internal Audit.

Please address inquiries regarding this report to the Office of Independent Internal Audit at 404-371-2765.



DeKalb County
GEORGIA



Human Resources & Merit System Response
to
Office of Independent Internal Audit

**2018 REVIEW OF EMPLOYEES FILES WITH HUMAN RESOURCES
PROJECT #: 2018-006-HRMS**

Review Period: January 1, 2017 - August 31, 2018

September 4, 2020

HR Management Response

Executive Summary

HR Overview

HR has oversight responsibility for organization and employee development; employee and management relations; policy development and administration; employee information systems and data management; occupational compliance; and operational department support to include talent acquisition, and classification and compensation. These efforts are executed with a staff of 35 and a budget of approximately \$4 million. All HR managers hold national certifications recognized by both the private and public sectors.

The Human Resources Information Systems (HRIS), Business Operations, and Generalist Divisions of HR, as well as user departments (UD), contribute to the creation, management, and maintenance of the official personnel records of County employees.

OIIA's May 2018 audit of HR's file maintenance system and processes included a review of 60 randomly selected files of employees hired January 1, 2017 - August 31, 2018. Of those files, 43% of the sampling were temporary/seasonal hires, which have a different hiring process and document requirements than regular status employees.

Chapter 20 of DeKalb County's Personnel Code and Administrative Policies and Procedures consider temporary employees as non-merit, not subject to hiring requirements of regular employees, not benefits eligible, have no appeal rights, and work 6 months or less. In most cases, temporary hires occur at the department level. For these files, HR is only responsible for ensuring compliance with federal requirements, and entering the hiring information in PeopleSoft to enable payment for hours worked.

As such, temporary personnel files are maintained differently and only contain the Personnel Action Form and I-9 form with associated identification documents. Items not required in the file would be an application, pension beneficiary form, and various acknowledgement forms. OIIA may have concluded these files were incomplete.

The remaining 57% of the sample of 60 files were regular status employees hired prior to the 2018 implementation of Taleo, an applicant tracking and onboarding system. Taleo has proven to minimize errors significantly, and improve efficiency in hiring and onboarding processes.

While HR is the custodian for all employee files (both merit and non-merit), it does not have administrative authority to require constitutional offices and other non-merit departments/agencies to adhere to HR policies and procedures. These entities, however, are gradually becoming more responsive to utilizing HR's systems.

Furthermore, if staff throughout the County responsible for HR-related functions were direct reports of HR, then more accountability, accuracy and consistency could be established in the file maintenance and management of employee records.

The audit yielded conclusions and recommendations based on broad observations and without understanding the nuances of HR's processes.

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Finding 1: Employee File Management and Maintenance Procedures Need Improvement.

OIIA's Recommendation:

- Update the policies and procedures to include the following:
 - Required documentation for the employee general files.
 - Copies of standard forms and templates to be used.
 - Procedures to ensure receipt of all documents from County departments.
 - Compliance with all applicable privacy laws and regulations.
 - File security, record retention, and disposal of files.

HR Response to Audit Finding 1 & Recommendation

HR acknowledges there are always opportunities for continuous improvement. Processes are periodically assessed and efficiencies implemented as permitted by allocated resources. **As such, numerous enhancements were made before and since the initial start of the audit.**

- The existing 'New Hire Checklist' serves as a reminder to UD's and HR Generalists of required forms and other documents necessary to process a new hire. The checklist is accessible on HR's intranet page under 'New Hire Corner' and 'Forms' sections. UD's should always reference HR's page for the latest forms, policies and information prior to onboarding a new hire. Instructions are communicated to department HR and payroll representatives at Policy Council meetings and during the 'HR Roadshow'.
- In January 2018, HR implemented electronic onboarding via Taleo. New hires processed through Taleo are now required to complete new hire forms online. Taleo tracks the new hire's progress and once forms are completed, the packet is printed by HR generalist and forwarded to HRIS for processing. HRIS processes the action in PeopleSoft. Finally, the personnel file is created and forwarded to the Business Division for filing. This enhancement eliminates the need for participating departments (all executive branch and some non-merit) to submit new hire documents. Consequently, onboarding via Taleo should minimize the likelihood of missing and incomplete documents.
- The records room was revamped early 2018 to improve the management of personnel files. Regular employee files, confidential records (background, physical and I-9 documents) and temporary files are stored separately, in accordance with United States Citizenship and Immigration Services (USCIS) and best practices for the privacy and protection of documents. Additional storage was installed to accommodate onsite maintenance of all active files and 7 years of inactive files, in accordance with the State of Georgia's Retention Schedule.
 - Prior to this redesign, HR maintained only 3 years of inactive general personnel files onsite. Older inactive files were moved offsite to the County's central Records Management Division, where they were stored and then destroyed after the seven-year retention period. Having all files onsite and readily accessible to staff improved HR's responsiveness

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to open records requests, Law department and other department/agency inquiries, and completion of internal equity reviews, etc.

- HR hired a part-time employee in May 2018 having sole responsibility for managing HR personnel files. The employee has 30+ years of experience in records management with the State of Georgia.
- Records are maintained in accordance with the State of Georgia record retention schedule and SHRM best practices for managing employee files.
- HR staff are required to sign a confidentiality agreement to understand the importance of maintaining security and safeguarding information. This information includes, but is not limited to, Social Security numbers, performance reviews, workplace injury reports, background checks, health-related information, pay levels, etc. As a public-sector employer, the County is subject to open-record/freedom-of-information laws, which impact the confidentiality of agency records.
- Temporary/seasonal employees are screened, selected, and hired by the WorkSource and Parks and Recreation departments using their own criteria, and do not utilize HR's hiring and onboarding processes. Since 2019, these temporary/seasonal employees are hired in PeopleSoft through an automated batch file upload using the Taleo interface. HR prints the personnel action form centrally to add to the temporary personnel file, which ensures all files will contain a PA2 form along with the I-9 documents.

HR Improvements in Process

- 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](#)
- 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](#)
- 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](#)
- 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.](#)

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- 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
- 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
- Continue to train HR and department staff on SOP updates, new processes, laws and regulations. Ongoing
- 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.
- Review twice a year at least 5% of randomly selected new hire files for compliance with applicable SOP. Ongoing

Finding 2: Employee File Management and Maintenance Training not Performed.

OIIA's 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 files.

HR Response to Audit Finding 2 & Recommendation

Training is an integral part of employee development and offers an opportunity to improve employee job performance. Accordingly, HR provides related supplemental training.

HR Current Training Initiatives

- New employees in HR with file maintenance and management related responsibilities receive one-on-one (on-the-job) training at hire, and coaching and development occurs throughout the employee's tenure.
- Designated HR staff attend Open Records and Risk Management records retention and disposal training as scheduled by the departments of Law and Finance, respectively.
- HR offers general guidance on file content, security and confidentiality via PeopleSoft (quarterly), Policy Council meetings (quarterly), Taleo (monthly), and HR Roadshow (semi-annually) training to County departmental staff. Attendance is documented via sign-in sheets, and the employee's training record is updated in PeopleSoft.

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HR Training Initiatives in Process

While HR does not have oversight responsibility for maintenance and security of employee records at the department level, HR agrees to do the following:

- 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.](#)
- 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.](#)