## CITY OF FORT LAUDERDALE

## OFFICE OF THE CITY AUDITOR

## **Audit of the Human Resources Department**

Report #09/10-01

December 29, 2009

# City of Fort Lauderdale

## **Our Vision**

The City of Fort Lauderdale is committed to improving productivity, streamlining expenses and developing a stronger, more effective organization.

## This City's vision embraces:

- Fiscal Responsibility
- Accountability
- High Ethical Standards and
- Quality Delivery of Services

## **Our Values**

> Respect	for the dignity of our citizer	ns and co-workers and
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the diversity of all groups.

> Integrity as demonstrated by honesty and fairness and

conduct beyond reproach.

**Courage** to do the right thing, for the right reason, in the

right way.

**Teamwork** through recognition that excellence is achieved by

cooperation, communication and collaboration.

> Service to the public, our elected officials and other

employees that is exemplary and exceeds

expectations.

> Creativity as the foundation for ingenuity and innovation in

the delivery of service.

**Accountability** for our decisions, actions and results.



## FORT LAUDERDALE

City Auditor's Office

### **Memorandum**

No: 09/10-01

Date: December 29, 2009

To: Mayor John P. "Jack" Seiler

Vice-Mayor Bruce G. Roberts

Commissioner Charlotte E. Rodstrom Commissioner Bobby B. DuBose Commissioner Romney Rogers

From: John Herbst, CPA, CGFO, MBA

City Auditor

Re: Audit Report #09/10-01: Audit of the Human Resources Department

We have completed an operational audit of the Human Resources Department (HRD), covering policies and procedures for recruitment and assessment, employee relations, training, classification and compensation, as well as other relevant areas of HRD. An operational audit evaluates internal controls designed and implemented by management to provide assurance that the organization's operational goals and objectives will be achieved.

The City Auditor's Office audit of the City's human resources function revealed that except for the findings listed below, HRD generally has adequately designed controls which, for the most part, are functioning as intended to help the department meet their stated objectives of:

"The Human Resources division provides professional and responsive human resource services by recruiting, developing, and retaining a highly qualified, diverse workforce, through best human resource practices and by monitoring compliance with established policies and procedures, labor contracts, and employment laws enabling the City to achieve its established goals and objectives."

However, as listed below and discussed in more detail in the report, we did find a number of opportunities for improvement that would assist the department in enhancing efficiency and effectiveness, improving communications, and strengthening internal controls.

We note with disappointment that management has declined to adopt a number of our recommendations. In all cases, our recommendations rely on the internal control framework established by The Committee of Sponsoring Organizations of the Treadway Commission (COSO). COSO framework elements establish commonly accepted, cost-effective mechanisms to evaluate and improve the effectiveness of the organization's risk management, control, and governance processes.

#### The objectives of our audit were:

- To determine if HRD has updated its policies and procedures manual.
- To determine if HRD is in compliance with major Federal and State employment laws.
- To determine if HRD is maintaining complete and accurate employee personnel files.
- To determine whether HRD is meeting stakeholder needs and expectations.
- To determine if HRD is adequately disseminating key information and metrics.
- To determine if employees are receiving adequate training necessary to their positions.
- To determine whether HRD has thoroughly tested its Continuity of Operations Plan (COOP).
- To determine if the goals published by HRD have corresponding accomplishments in the Annual Operating Budget.

Our review of the internal controls of the Human Resources Department would not necessarily identify all deficiencies that might be significant deficiencies or material weaknesses. Of the findings listed below, we believe Finding 11 to be a material weakness. The remaining findings and comments are considered to be control deficiencies.

- A *control deficiency* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent or detect misstatements on a timely basis.
- A *significant deficiency* is a control deficiency, or combination of control deficiencies, that adversely affects the entity's ability to initiate, authorize, record, process, or report financial data reliably in accordance with generally accepted accounting principles such that there is more than a remote likelihood that a misstatement of the entity's financial statements that is *more than inconsequential* will not be prevented or detected.
- A *material weakness* is defined as a significant deficiency, or combination of significant deficiencies, that results in more than a remote likelihood that a *material* misstatement of the financial statements will not be prevented or detected.

### **AUDIT FINDINGS**

- F1. HRD does not maintain a compilation of major federal and state employment laws it must comply with nor do they conduct self-audits.
- F2. HRD is not consistently adhering to the City's adopted FMLA policy.
- F3. An improper segregation of duties exists in the Risk Division with regards to billing, payment, and receipting of insurance premiums.
- F4. HRD is not verifying that I-9 employment eligibility forms are complete and accurate.
- F5. Medical fitness for hire could not be verified as having been completed prior to start dates and driving records are not being reviewed for all new hires.
- F6. HRD is not consistently maintaining complete employee personnel files and verifying that completeness through periodic self-audits.

- F7. HRD is not following up with the departments often enough to assure performance reviews are completed within 30 days of the due date.
- F8. HRD is not actively updating job descriptions and verifying that they reflect current practices.
- F9. Management has not developed a citywide policy to encourage employee succession planning and mentoring programs for key functions/positions.
- F10. HRD has not conducted skills training for general employees since 8/27/08.
- F11. HRD has not verified the factual accuracy of, nor tested, its Continuity of Operations Plan.

#### **AUDITOR COMMENTS**

- AC1. HRD is not monitoring the display of employment posters for all City buildings.
- AC2. The City does not have a standardized donated leave policy for all City employees.
- AC3. HRD is not currently conducting customer satisfaction surveys.
- AC4. HRD is not tracking the various stages of the recruitment process.
- AC5. HRD is not adequately disseminating grievance procedures to non-union employees.
- AC6. HRD is not conducting employee exit interviews or reporting employee turnover data to the City Commission.
- AC7. HRD has not created a strategic staffing plan to assess future personnel needs.
- AC8. The Policy and Standards Manual and Personnel Rules are not being reviewed and revised on an ongoing basis.
- AC9. HRD has not published a comprehensive employee handbook.
- AC10. HRD is not ensuring that all employees receive new employee orientation within 30 days of being hired.
- AC11. HRD is not optimizing its website for communicating information to internal and external users.
- AC12. An objective set of criteria for reviewing employee suggestions has not been implemented to date.
- AC13. HRD has not developed meaningful performance measures to demonstrate whether it is achieving the goals and objectives outlined in the annual budget book.

Management's responses to the findings and recommendations are included in the report. We did not audit management's responses and accordingly, we express no opinion on them.

We would like to thank the staff of the Human Resources Department for their cooperation and assistance during this audit.

cc: George Gretsas, City Manager
 Harry Stewart, City Attorney
 Jonda Joseph, City Clerk
 Averill Dorset, Human Resources Department Director

## CITY OF FORT LAUDERDALE CITY AUDITOR

### **Human Resources**

#### **PURPOSE**

To conduct an operational audit of the City of Fort Lauderdale's Human Resources Department.

#### **EXECUTIVE SUMMARY**

We have completed an operational audit of the Human Resources Department (HRD), covering policies and procedures for recruitment and assessment, employee relations, training, classification and compensation, as well as other relevant areas of HRD. An operational audit evaluates internal controls designed and implemented by management to provide assurance that the organization's operational goals and objectives will be achieved.

The City Auditor's Office audit of the City's human resources function revealed that except for the findings listed below, HRD generally has adequately designed controls which, for the most part, are functioning as intended to help the department meet their stated objectives of:

"The Human Resources division provides professional and responsive human resource services by recruiting, developing, and retaining a highly qualified, diverse workforce, through best human resource practices and by monitoring compliance with established policies and procedures, labor contracts, and employment laws enabling the City to achieve its established goals and objectives."

However, as listed below and discussed in more detail in the report, we did find a number of opportunities for improvement that would assist the department in strengthening internal controls, enhancing efficiency, effectiveness, and improving communications.

#### **AUDIT FINDINGS**

- F1. HRD does not maintain a compilation of major federal and state employment laws it must comply with nor do they conduct self-audits.
- F2. HRD is not consistently adhering to the City's adopted FMLA policy.
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- F5. Medical fitness for hire could not be verified as having been completed prior to start dates and driving records are not being reviewed for all new hires.
- F6. HRD is not consistently maintaining complete employee personnel files and verifying that completeness through periodic self-audits.
- F7. HRD is not following up with the departments often enough to assure performance reviews are completed within 30 days of the due date.
- F8. HRD is not actively updating job descriptions and verifying that they reflect current practices.
- F9. Management has not developed a citywide policy to encourage employee succession planning and mentoring programs for key functions/positions.
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- AC7. HRD has not created a strategic staffing plan to assess future personnel needs.
- AC8. The Policy and Standards Manual and Personnel Rules are not being reviewed and revised on an ongoing basis.
- AC9. HRD has not published a comprehensive employee handbook.
- AC10. HRD is not ensuring that all employees receive new employee orientation within 30 days of being hired.
- AC11. HRD is not optimizing its website for communicating information to internal and external users.

AC12. An objective set of criteria for reviewing employee suggestions has not been implemented to date.

AC13. HRD has not developed meaningful performance measures to demonstrate whether it is achieving the goals and objectives outlined in the annual budget book.

#### STATEMENT OF OBJECTIVES

The City Auditor's Office (CAO) set the following objectives when conducting the operational audit of the City of Fort Lauderdale's Human Resources Department:

- To determine if HRD has updated its policies and procedures manual.
- To determine if HRD is in compliance with major applicable Federal and State employment laws.
- To determine if HRD is maintaining complete and accurate employee personnel files.
- To determine whether HRD is meeting stakeholder needs and expectations.
- To determine if HRD is adequately disseminating key information and metrics.
- To determine if employees are receiving adequate training necessary to their positions.
- To determine whether HRD has thoroughly tested its Continuity of Operations Plan (COOP).
- To determine if the goals published by HRD have corresponding accomplishments in the Annual Operating Budget.

#### **BACKGROUND**

The City's Human Resources Department is a service department that supports various components of City operations. HRD has a fiscal year 2009 total budget of \$2,848,045 and staffs 20 employees out of 24 authorized full-time equivalent (FTE) positions. These staff members engage in the following major functions:

- 1. Recruitment and Assessment
- 2. Compensation and Classification
- 3. Review of Job Descriptions
- 4. Labor and Employee Relations/Contract Negotiations
- 5. Organizational Development (Training)

Within these functions, HRD serves the user departments by recruiting qualified and diverse employees, as well as monitoring compliance with established policies and procedures, labor contracts, and employment laws. Additionally, HRD is tasked with overseeing labor and employee relations, including contract negotiations, grievances, and administration.

#### **SCOPE & METHODOLOGY**

The CAO interviewed the Director of Human Resources, the Employee Relations Director and the Classification and Compensation Manager as well as staff. We reviewed compliance with major federal and state employment laws and regulations, specific sections of Chapter 6 in the Policy and Standards Manual (Employee Relations and Welfare), the Personnel Rules and specific contract provisions from the various collective bargaining agreements.

The CAO conducted its assessment of the effectiveness of the City's internal controls using the control framework established by The Committee of Sponsoring Organizations

of the Treadway Commission (COSO). COSO was formed in 1985 to sponsor the National Commission on Fraudulent Financial Reporting, whose charge was to study and report on the factors that can lead to fraudulent financial reporting. In 1992, COSO published Internal Control—Integrated Framework, which established a framework for internal control and provided evaluation tools that entities could use to evaluate their control systems. The five components of the COSO internal control framework are: control environment, risk assessment, control activities, information and communication, and ongoing monitoring.

## Objective 1

*To determine if HRD has updated its policies and procedures manual.* 

HRD has a collection of binders with detailed procedural instructions and computer screen shots that describe specific tasks for all of their administrative positions with the exception of professional positions such as the Classification & Compensation Manager and the Director of Employee Relations. These positions require professional judgment and independent interpretation and application of the various PSMs, Personnel Rules and Collective Bargaining Agreements and therefore are less structured.

## Objective 2

To determine if HRD is in compliance with major applicable Federal and State employment laws.

#### FINDING 1.

Condition

The HRD does not maintain a compilation of major federal and state employment laws and does not conduct self-audits to assure compliance with these laws and regulations.

#### Criteria

Under the COSO framework Monitoring component 5.2 "Separate, periodic evaluations of control components", on-going audits are a standard element of the internal control environment. Internal controls in a compliance rich environment require a proactive approach to monitor compliance with major federal and state employment laws and regulations.

#### Cause

HRD has not established a compilation of major federal and state employment laws and is not conducting self-audits to verify compliance with those regulations.

**Impact** 

The establishment of an effective self-audit program may serve to mitigate the risk of non-compliance and decrease the likelihood of punitive fines and reputational loss.

#### Recommendation

The City Manager should require the Director of HRD to:

- 1. Compile a list of the major federal & state employment laws the City must comply with.
- 2. Conduct periodic self-audits to assure compliance with these laws and regulations.

#### **Management Response**

Laws impacting the area of Human Resources are broad, varied, and dynamic. Though an itemized list of the various laws that govern the area of Human Resources is not posted within the department, compliance efforts are required and maintained. Means of achieving compliance include, but are not limited to, the HRD's participation in an Executive Roundtable of public sector HR organizations across South Florida for purposes of benchmarking HR practices, as well as keeping abreast of developments in the field through training and membership in relevant professional organizations including International Public Management Association (IPMA), Florida Public Employees Labor Relations Association (FPELRA), and the Labor and Employment section of the Florida Bar. HRD subscribes to the Fair Labor Standards Handbook, published by Thompson Publishing Group, which is designed to guide HR departments through the complex process of complying with the Fair Labor Standards Act (FLSA). Thompson issues monthly updates covering case law, U.S. Department of Labor, Wage and Hour Division, Administrative Letter Rulings, changes to the various provisions of the FLSA, etc. On an ongoing basis, HR monitors changes in the Family and Medical Leave Act (FMLA) via review of the United States Department of Labor's website as well as other HR publications/websites. Additionally, the City Attorney's Office and outside counsel are utilized as needed for legal guidance and updates on legislative, judicial, and regulatory developments affecting HRD. In lieu of compiling a list of applicable HR related laws that the City must comply with, HRD will request an annual legal update provided by the City Attorney's Office or outside counsel as may be appropriate and within budgetary constraints to assist in these efforts and will conduct self-audits to assure compliance with these laws and regulations.

#### **AUDITOR COMMENT 1.**

#### Condition

The CAO's review of the City of Fort Lauderdale's compliance with federal and state employment poster requirements revealed an overall compliance rate of only 53.1%. Federal and State laws mandate that employers post employment related notices for the benefit of its employees. Upon initial inquiry, HRD was not able to produce a list of all posters that are required to be displayed. HRD later compiled a list and provided it to the CAO's. The CAO also found that HRD is not actively updating nor monitoring employment posters displayed in City offices outside of City Hall.

**Auditor Note:** The CAO recognizes that it is difficult to maintain up to date information on consolidated posters that illustrate 10 or more individual abbreviated posters. A web page may serve to link those interested employees to the most current detail on each of these requirements.

#### Criteria

Under the COSO framework Information and Communication component 4.1 "Mechanisms that support information flow inside the organization", ongoing

communication of personnel announcements are a standard element of the internal control system.

#### **Recommendation**

The City Manager should require the Director of HRD to:

- 1. Review the list of federal, state and local workplace posters provided to the CAO to ensure all required posters are included and update the displayed posters as required by law.
- 2. Conduct regular inspections on the 3rd floor in City Hall as well as the various other locations outside of City Hall to confirm that the City is in compliance with all posting requirements.
- 3. Add hyperlinks to the HRD website to provide ready access to the most current information.

#### **Management Response**

HRD will review the list of federal, state and local workplace posters with the City Attorney's Office to ensure all required posters are included, updated and displayed as required by law. HRD will conduct quarterly inspections on the 3<sup>rd</sup> floor in City Hall as well as other locations outside City Hall to confirm that the City is in compliance with all posting requirements. HRD will not add hyperlinks as it is not recommended that non attorney staff or non HRD staff that are not trained in the relevant employment laws should be accessing federal or state statutes in an attempt to interpret or apply them to specific matters. Rather it would be more appropriate to have non-HRD staff contact HRD for additional information as posters are updated.

#### FINDING 2.

#### Condition

The CAO reviewed HRD practices regarding the management, accounting and approval of absences under the Family Medical Leave Act of 1993 (FMLA) as outlined in PSM 6.2.5.1. Our review focused on the design and effectiveness of internal controls and we noted the following weaknesses and/or opportunities for improvement:

- 6 of 11 (55%) of the employees in our sample did not exhaust all accrued sick/vacation time in accordance with City policy prior to commencing unpaid FMLA leave.
- CAO could not independently verify that all employees who may have been eligible for FMLA were provided with proper notice of the availability of FMLA.
- CAO found that the City did not have the capability of tracking FMLA leave in the payroll system, however we did note that HRD inquired about creating a new HED code in December 2008.
- The FMLA policy does not contain language that requires those employees who do not return to work for the City after the FMLA period to be terminated.

#### Criteria

The PSM requires that an employee exhaust all accrued sick and vacation time prior to commencement of unpaid FMLA leave. The policy is silent regarding how an employee acknowledges receipt of information about the availability of FMLA benefits and does

not currently require an employee's resignation at the end of the FMLA period if they do not return to work for the City.

#### Cause

HRD has not developed sufficient internal controls to monitor compliance with the City's PSM on FMLA leave.

#### **Impact**

The City undermines the effectiveness of its policies and procedures when they are not applied consistently.

#### Recommendation

The City Manager should require the Director of HRD to:

- 1. Adhere to the existing City policy that requires that an employee exhaust all accrued sick/vacation time prior to commencing unpaid FMLA leave.
- 2. Implement a separate HED code to track the use of FMLA leave.
- 3. Implement an acknowledgement form stating that the department supervisor properly informed the employee of the availability of FMLA.
- 4. Develop a policy for approval by the City Commission whereby an employee would be terminated after a designated time period if they do not return to work for the City at the end of unpaid leave or the FMLA period. This would ensure equitable treatment of employees and assist managers in scheduling and meeting departmental objectives.

#### **Management Response**

HRD has already taken steps to improve compliance with the City's policy regarding FMLA leave. In December 2008, HRD and ITS collaborated on creating an FMLA code in the Cyborg payroll system. This FMLA code went live in June 2009. Additionally, the City's Personnel Rules state that an employee may be dismissed for being absent without leave or failing to report for work after a leave of absence has expired. The various labor contracts contain similar language regarding failure to return to work from an authorized leave of absence. Any change to the leave policies regarding employees covered under a collective bargaining agreement must be negotiated with the union. In the future, HRD will emphasize, both to employees requesting FMLA leave and to department timekeepers, the requirement that all accrued vacation and sick leave be used prior to employees taking unpaid FMLA leave. Furthermore, the issue of uniformity on leave policies will be discussed with the City Commission prior to the beginning of the next negotiations for the non sworn employees in collective bargaining groups

#### FINDING 3.

#### Condition

The CAO conducted a review of Risk Management's billing, collecting and receipting of various insurance premiums (health, dental and life) from employees while they are out on unpaid leave and noted the following internal control weaknesses:

• An improper segregation of duties exists because the billing, payment and receipting functions are performed by the same person. Moreover, the Insurance

- Benefits Specialist tracks the billing and payment of premiums manually even though the City's payroll system is capable of accounting for these transactions electronically.
- The Personnel Records Specialist in HRD missed an opportunity to collect an outstanding insurance arrears balance from the pension payments of a newly retired employee based on the belief that the insurance premium arrears balance could not legally be offset against a City pension payment. HRD was not able to provide authoritative support confirming this belief.

#### Criteria

Under the COSO framework Control Activities component 3.2 "Responses that prevent or detect the risk of intentional or unintentional errors", segregation of incompatible duties is a standard element of an internal control system. Effective internal controls require that the billing and payment receipt functions be performed by separate individuals. Additionally, the City's payroll software should be used to capture all transaction detail relating to billing and payment of insurance premiums thereby creating a complete, comprehensive electronic audit trail. The City should always offset amounts due against amounts owed to City employees when legally permissible.

#### Cause

The Risk Management division has not evaluated operating procedures from an internal control perspective. Furthermore, HRD did not confirm with the City Attorney that it would be illegal to offset an arrears balance for insurance premiums against a City pension payment.

#### *Impact*

To reduce the possibility of human error, the Cyborg payroll software system should be used to its full capacity. Furthermore, the City may not be maximizing the collection of outstanding insurance premiums based on the right of offset.

#### Recommendation

The City Manager should require the Finance Director to:

- 1. Separate the billing and insurance premium payment receipt functions to ensure the proper segregation of incompatible duties.
- 2. Develop a procedure to record payments against the arrears balance in Cyborg for unpaid insurance premiums. The Cyborg payroll system would then serve as an electronic subsidiary receivables ledger and replace the current manual system. This new procedure would be in addition to the normal processing of cash receipts through the Treasury division.
- 3. Contact the City Attorney to determine if it is permissible to offset an arrears balance for insurance premiums against a City pension payment.

#### **Management Response**

Finance Department should respond.

**Auditor Note:** As a likely result of management staff turnover in the Finance Department, no response was received for this recommendation.

#### **AUDITOR COMMENT 2.**

#### Condition

The CAO found that the multiple union contracts as well as the PSM vary in the amount of donated leave an individual employee may receive. Additionally, it was noted that City employees utilizing donated leave continue to accrue personal benefits such as pension, sick and vacation leave.

#### Criteria

Under the COSO framework Control Activities component 3.1 "Responses that reduce or share specific risks" annual and long-term budgeting procedures as well as standardized contracts are fundamental elements of the internal control environment.

#### Recommendation

The City Manager should require the Director of HRD to:

1. Review the current donated leave policies and consider changes to the associated benefits. Revisions may include uniformity among employee contracts, caps on donated leave, and suspension of additional accrued benefits such as sick, vacation and pension.

#### **Management Response**

Changes to leave policies and other benefits are reviewed often, especially prior to contract negotiations, and changes must be negotiated for employees covered by a collective bargaining agreement. However, the priorities for the unionized employee groups vary, so it is difficult to impose a uniform standard. Also, this issue will be discussed with the City Commission prior to the next round of negotiations with non-sworn unionized employees.

#### FINDING 4.

#### Condition

The CAO's review of the City's compliance with I-9 employment eligibility verification for City employees indicated that existing internal controls were insufficient to detect errors and omissions in the forms. Our attribute testing of a sample of 52 general employees and 10 sworn police officers revealed that 29% and 11% respectively of the I-9 forms were incomplete.

**Auditor Note:** The CAO noted that some of the employee I-9 forms contained additional information that was unnecessary and indicates that HRD employees reviewing I-9 forms are not familiar with the requirements set by the U.S. Citizenship and Immigration Services (USCIS).

#### Criteria

Under the COSO framework Control Activities component 3.3 "Actions by direct functional or activity management", secondary reviews are a standard element of the internal control system.

#### Cause

HRD management has not implemented effective quality control procedures to assure that I-9 forms are reviewed for accuracy and completeness.

### **Impact**

Failure to accurately complete employment eligibility I-9 forms may result in extensive fines being levied by the federal government. Federal guidelines provide that each violation may result in a fine between \$110 and \$1,100.

#### Recommendation

The City Manager should require the Director of HRD to:

- 1. Conduct I-9 form training for HRD staff.
- 2. Implement a policy requiring supervisory review and initialing to assure the I-9 forms are both accurate and complete.
- 3. Consider creating a system for digital imaging of I-9 forms, in accordance with federal guidelines. Such a system will serve to reduce the administrative burden on HRD by eliminating paper copies of I-9 forms, as well as simplifying compliance when being audited by the federal government.

#### **Management Response**

HRD will conduct I-9 form training for HRD staff and implement a policy requiring supervisory review and initialing to assure that the I-9 forms are accurate and complete. HRD already has an imaging system, which is utilized to scan all documents in a personnel file.

#### FINDING 5.

#### Condition

The CAO reviewed the recruitment and assessment process and performed attribute testing of current practices based on a discussion with the HRD Director. The following conditions were noted:

- The Medical Examination Appointment form is signed by the physician and indicates whether the applicant is qualified for the position listed; however, it is not dated by the doctor.
- A driver's license history was not performed for 5 of 23 (22%) of the employees in our sample hired between 1/07 and 4/09.

#### Criteria

The Medical Examination Appointment form should clearly document that medical clearance was obtained before the official start date for a new hire.

The City's PSM #6.16.1, "HIRING RESTRICTIONS AND RULES FOR EXISTING EMPLOYEES": To establish a uniform policy for the selection and retention of employees who will be required to operate City vehicles or their own vehicles on City business. Procedure (A) states, "No driver applicant will be hired if he/she does not possess or cannot obtain a valid Florida driver's license".

#### Cause

HRD has not prioritized the following practices in regards to recruitment and assessment:

- Consistent adherence to the PSMs.
- Review of pre-employment medical documents.

#### *Impact*

Failure to check key employment criteria prior to a new hire's start date could lead to having to terminate individuals after they have already begun their employment or a lawsuit for negligent hiring practices if one of these new hires is involved in an auto accident.

#### Recommendation

The City Manager should require the HRD Director to:

- 1. Revise the Medical Examination Appointment form by adding a line for the physician to insert the date on which testing was performed. This would clearly document the medical condition of the applicant prior to employment.
- 2. Ensure that a driver's license history be performed for all employees.

#### **Management Response**

HRD will revise the Medical Examination Appointment form and add a line for the physician to insert the date of the medical examination. A driver's license history will be done for all new hires for which a driving record is a bona fide job qualification or as otherwise deemed appropriate for job classification in accordance with the City's Driver's policy. PSM 6.16.1 is being updated (currently pending Assistant City Manager approval), and among the proposed revisions is a clarification that on an annual basis an employee's immediate supervisor must verify that the employee has a valid driver's license. This will be accomplished via inspection of the actual license and by verifying with the State of Florida that the license is valid. However, it should be noted that Section 2(A) of the PSM noted by the CAO is only one section of the City's Driver's PSM. The PSM clearly states that the purpose of the PSM is "to establish a uniform policy for the selection and retention of employees who will be required to operate City vehicles or their own vehicles on City business". Therefore, all new hires are not required to undergo a driver's license history check if the employee will not be driving a City vehicle or his or her own vehicle on City business.

## Objective 3

To determine if HRD is maintaining complete and accurate employee personnel files.

#### FINDING 6.

Condition

HRD is tasked with maintaining complete and accurate records of its employees. As such the CAO conducted a review and attribute test of employee personnel files and found that no written procedures or checklists of what should be included in a personnel file existed. The CAO also found that there was no supervisory review of personnel files

to ensure that all necessary documents are maintained. In addition, the CAO's attribute testing revealed four specific documents that were not being consistently maintained: criminal background check, beneficiary form, oath of office, and the City policies acknowledgement form(s).

	Criminal background check	Beneficiary form	Oath of Office form	City policies acknowledgement form
<pre># of files with errant condition</pre>	17 of 52	3 of 30*	10 of 52	8 of 52
% incomplete	33%	10%	19%	15%

<sup>\*</sup>Full time employees

**Auditor Note:** CAO noted that 2 employee personnel files from the sample could not be located by staff.

CAO also found that the Police department is maintaining a separate shadow personnel file for their administrative staff separate and apart from the personnel file kept in HRD.

#### Criteria

Under the COSO framework Control Activities component 1.7 "Human Resources Standards", organization-wide HR policies and standards, hiring and selection procedures, employee termination procedures, salary and bonus systems, background checks, personnel evaluation systems, upward and 360 feedback processes, employee self-assessment processes, remedial actions toward policy violations are standard elements of the internal control system.

#### Cause

HRD does not have a comprehensive set of written policies and procedures that outline what must be maintained in an employees personnel file nor does HRD conduct supervisory reviews to ensure the files are accurate and complete.

#### **Impact**

Discrepancies in personnel files, as well as an absence of essential documents represent a material control weakness and may result in future liabilities for the City.

#### Recommendation

The City Manager should require the Director of HRD to:

- 1. Create a written procedure and personnel file checklist to be filled out by recruitment staff and reviewed by a supervisor to ensure the file is complete and accurate.
- 2. Conduct a self-audit of existing personnel files to assure they are both accurate and complete.

- 3. Instruct the Director of HRD to include a form to confirm/update the named beneficiary for all regular full-time employees as part of their annual evaluation.
- 4. Implement a sign-out procedure to establish accountability for employee and sworn police officer personnel files removed from the department.

#### **Management Response**

There is no universal or standard list of documents that comprise a personnel file. However, HRD has compiled a checklist of documents that are routinely found in our employee personnel files.

HRD will conduct a self-audit of existing personnel files every six (6) months. HRD believes a review of 10 randomly selected files every six (6) months will provide sufficient data to ensure that files are accurate and complete and will reveal any shortcomings that must be corrected.

Regarding recommendation number 3, HRD does not believe it is necessary to add a form to confirm/update the named beneficiary for all regular full-time employees as a part of their annual evaluation. HRD will ask the Public Information Department to send out a reminder concerning this topic on an annual basis. Employees must take responsibility for updating this type of information just as employees are responsible for notifying the City of an address change, name change, etc.

Recommendation number 4 states that HRD should implement a sign-out procedure to establish accountability for employee and sworn police officer files removed from the department. It must be noted that both FOP labor agreements (Police Officers and Sergeants/Police Lieutenants and Captains) include a provision requiring that the personnel records for these employees be maintained in the appropriate unit within the Police Department. Therefore, HRD does not maintain personnel files for these employees. HRD does not allow the personnel files it maintains to be removed from the department. Therefore, a sign-out procedure is not needed. HRD does have a sign-out sleeve that staff uses whenever a personnel file is removed from the file room so that other staff can locate the file within the department; however, as previously stated, no files are removed from the department.

#### REBUTTAL

The CAO was not informed of the existence of a sign-out sleeve during our audit. In any event, since HR staff was unable to locate one of the files we requested as part of our sample, it is clear that the sign-out sleeve is not functioning as a control mechanism. Furthermore, although the PD sworn officers' files are kept at PD, HR should still be setting and communicating appropriate standards for the care and handling of the files by PD staff.

## Objective 4

*To determine whether HRD is meeting stakeholder needs and expectations.* 

#### **AUDITOR COMMENT 3.**

#### Condition

The CAO's review of HRD's efforts to meet stakeholder needs and expectations revealed that they are not proactively seeking input from either internal or external customers to gauge user satisfaction with the quality and effectiveness of the services HRD provides. Furthermore, HRD staff is not currently receiving customer service training, which is of paramount importance for a department that primarily exists to provide services to other departments within the government.

#### Criteria

Under the COSO framework Information and Communication component 4.1 "Mechanisms that support information flow inside the organization", internal survey processes and component 4.2 "Mechanisms that support information flow outside the organization", external surveys are a standard element of the internal control system.

#### **Recommendation**

The City Manager should require the Director of HRD to:

- 1. Develop and conduct an annual survey of job applicants and City employees to inquire about their level of satisfaction with the array of services provided by HRD. The survey results should be analyzed and used as a planning tool to promote and prioritize service delivery improvements.
- 2. Provide HRD staff with annual customer service training to assure that staff responds to service requests with a customer focused approach.

#### **Management Response**

HRD will explore the possibility of conducting an annual customer service survey. Staff will receive customer service training budget permitting.

#### **AUDITOR COMMENT 4.**

#### Condition

CAO found that HRD is not currently tracking the various stages of the recruitment process and hiring of new City employees.

#### Criteria

Under the COSO framework Internal Control Environment component 1.7 "Human resource standards" hiring and selection procedures are a standard element of the internal control environment.

#### Recommendation

The City Manager should require the Director of HRD to implement a new procedure to track the recruitment of employees, setting targets for the various stages of the recruitment process, in an effort to target and hire potential employees in a more expeditious and efficient manner.

#### **Management Response**

HRD does track the various stages of the recruitment process. HRD currently uses TRAC and FYI/EMPOWER to track certain stages of the application process. Furthermore, prior to each recruitment, the Personnel Analyst discusses timelines with the hiring department. However, there is no standard timeline for each recruitment because each recruitment varies based on the position, pool of applicants, etc.

#### **REBUTTAL**

The CAO was not informed of the use of TRAC and FYI/EMPOWER to track stages of the application process during the course of our audit. Accordingly we could not evaluate whether these tools are functioning as intended.

#### FINDING 7.

#### Condition

The CAO conducted a review of the performance evaluation process to determine the timeliness of annual reviews for 35 randomly selected employees. Testing revealed that performance reviews for 12 of 35 employees (34%) were entered into the payroll system more than 30 days after the due date.

#### Criteria

Effective management decision making and reliable payroll projections depend on accounting information that is accurate, relevant, timely and reliable.

#### Cause

HRD notifies departments on a quarterly basis of any performance reviews, which are past due. Performance reviews may be obtained on a more timely basis if departments were notified of past due reviews every week.

#### **Impact**

Completing performance reviews promptly will ensure accurate accounting for payroll, as well as provide valuable feedback to staff in a timely manner. Morale suffers when employees perceive that their evaluations are given a low priority by their supervisors.

#### Recommendation

The City Manager should require that department directors ensure that performance reviews for all staff are completed when due. In addition, the Director of HRD should implement a process to notify the City Manager and department directors every week that a performance review is past due.

#### **Management Response**

Weekly notices would be administratively burdensome considering that one HR employee is responsible for the administration of the entire citywide performance evaluation process, this employee has other ongoing responsibilities, and notices are already sent out quarterly. HRD will continue to send out the report of past due performance reviews on a quarterly basis.

#### **AUDITOR COMMENT 5.**

#### Condition

The CAO conducted a review of the employee grievance process and found that HRD is adequately disseminating information on grievance procedures to unionized employees through both the union contracts and the presence of union stewards, but has not provided equivalent resources to non-union employees. Non-union employees are not specifically informed of the grievance procedures, but rather must navigate through the personnel rules to learn how to initiate the grievance process.

#### Recommendation

The City Manager should direct the Information Technology Department to work jointly with HRD to create a user-friendly hyperlink on the HRD website that informs non-union employees of how to report a grievance.

#### **Management Response**

HRD does not agree with this recommendation as the City's Personnel Rules, which are available on Lauderlink and from HRD, explain the appeal rights for non-union employees.

#### FINDING 8.

#### Condition

The CAO found during the examination of employee job descriptions that HRD is not actively reviewing and revising job descriptions to accurately reflect actual job functions. Of the 10 job descriptions reviewed 8 (80%) had not been updated in the past 7 years, moreover 6 out of 10 (60%) had not been updated in more than 18 years. Additionally, CAO found that few job descriptions properly describe the essential functions of the position.

#### Criteria

Under the COSO framework Internal or Control Environment component 1.2 "Commitment to competence" the analysis of required skills and job descriptions are a standard element of the internal control system. Accurate and up to date job descriptions are necessary to provide prospective and existing employees with a correct depiction of their duties and functions. Moreover, job descriptions should include those essential functions, which the employee must perform as a pre-requisite to their position.

#### Cause

Job descriptions have not seemingly been updated on a consistent basis as positions have evolved. Further, HRD has not actively engaged departments in the exercise of revising descriptions to accurately reflect their various positions' duties and essential functions.

#### **Impact**

Failing to update job descriptions on a ongoing basis can result in an accumulation of deficient descriptions that may not reflect current ADA guidelines or other employment related requirements and may expose the City unnecessarily to potential claims or liabilities.

#### Recommendation

The City Manager should require the Director of HRD to initiate a project to review job descriptions to assure they accurately reflect the actual position as well as include a correct statement of essential job functions. Additionally, the CAO recommends that the Director of HRD institute a new policy whereby all job descriptions will be reviewed and updated by department directors and recruitment staff before a new personnel requisition is issued.

#### **Management Response**

The City has approximately 420 classified service jobs for which HRD, working with applicable departments, develops and maintains job descriptions. Prior to recruiting for any job class, the Personnel Analyst reviews the job description and confers with the hiring department to determine if any changes are needed prior to posting the job announcement. This process ensures that the job description and announcement are upto-date for all posted jobs. HRD's job description format provides that the essential functions of a job class are included in the "Examples of Work Performed" section of each job description with the most important/critical and time consuming tasks listed at the top of the list.

Furthermore, it is estimated that 20-30 new or revised job descriptions are produced in a typical year. In fact, HRD has revised approximately 84 job descriptions and created 38 new job descriptions since 2004. Therefore, HRD does not agree with the recommendation that "all job descriptions will be reviewed and updated by department directors and recruitment staff before a new personnel requisition is issued" as such measures are already in place as previously described.

#### **AUDITOR COMMENT 6.**

#### Condition

The City of Fort Lauderdale does not conduct employee exit interviews to obtain valuable feedback from departing employees and is not currently tracking and reporting key information about departmental turnover rates to the City Commission and senior management.

#### Criteria

Under the COSO framework Internal Control Environment component 1.7 "Human Resource Standards", 360-degree feedback processes are a standard element of the internal control system. Additionally, under the COSO framework Information and Communication component 4.3 "Indicators and Measurements" the reporting of key metrics are a standard element of the internal control system.

#### **Recommendation**

The City Manager should require the Director of HRD to:

1. Develop a process for conducting employee exit interviews in an effort to solicit input and suggestions for improving the work environment and implementing action plans to reduce employee turnover.

- 2. Establish a tracking and reporting system of employee turnover by department. This information (departmental turnover, number of vacancies, length of time the position has been vacant, etc.) should be included in a quarterly HRD stats report to the City Commission.
- 3. With the assistance of the Office of Management and Budget, perform a study to quantify the cost of replacing various levels of employees in the City.

#### **Management Response**

Conducting exit interviews is not a universally accepted HRD process – many organizations use them but many do not. HRD conducted exit interviews in the 1980s and early 1990s. However, HRD's experience with exit interviews revealed that many exiting employees either did not participate in the process or did not wish to share their true thoughts regarding their work experience with the City. Therefore, HRD ceased its exit interview process as very little useful information was being gathered through the process.

Likewise, for many years, HRD kept turnover statistics, both by department and on a citywide basis. However, the numbers varied little over the years, and were not being utilized. Therefore, HRD stopped maintaining those statistics. For general information, the City's turnover rate was typically in the 5-7% range with the rate increasing to 8-10% for years during which the City was forced to layoff employees.

Based on the above, HRD does not agree with the CAO's recommendations 1 and 2; however, HRD is not opposed to recommendation 3 and is willing to work with OMB on this project.

### **AUDITOR COMMENT 7.**

Condition

The City's HRD has not created a strategic staffing plan to properly align staff levels with service demands and public policy decisions of the City Commission (contraction vs. expansion of workforce).

#### Recommendation

The City Manager should require the Director of HRD to coordinate with department heads to develop a citywide 5-year strategic staffing plan that aligns resources with service demands and public policy decisions of the City Commission. This is a key component of a 5-year financial forecast.

#### **Management Response**

The City Manager will consider the development of this staffing plan during the upcoming budget process.

#### FINDING 9.

Condition

The City does not actively engage in employee succession planning and mentoring for key functions/positions throughout the City and many such positions lack written policies and detailed procedures.

#### Criteria

Under the COSO framework Internal Control Environment component 1.2 "Commitment to Competence", succession planning is a standard element of the internal control environment. It helps to ensure a smooth transition, minimize disruption and mitigate costs resulting from the loss of institutional knowledge when long-term employees leave the organization.

#### Cause

Management has not mandated succession planning and the development of standard operating procedures for all departments.

#### **Impact**

Without formal succession planning and mentoring, the City risks decreased efficiency, effectiveness and quality of service delivery as new employees attempt to gain sufficient knowledge to perform the key aspects of their jobs.

#### Recommendation

The City Manager should instruct all department directors to develop a comprehensive employee succession/mentoring plan for key functions/positions within their respective departments. Moreover, a significant component of a successful employee succession/mentoring plan is a having a regularly updated set of written policies and procedures for each of these key functions/positions. This recommendation is further emphasized in Finding 1.

#### **Management Response**

Succession planning in its truest sense may be difficult to accomplish in the public sector given Personnel Rules, seniority considerations among bargaining units, etc; however, HRD will continue to work with City departments on workforce planning and identification of key skills that must be maintained within the department.

## Objective 5

To determine if HRD is adequately disseminating key information and metrics.

#### **AUDITOR COMMENT 8.**

#### Condition

The CAO found that the Personnel Rules and the Policy and Standards Manual (PSM) have not been reviewed and revised on an ongoing basis. As a result, certain sections of the PSM are missing and policies contained in both documents may not reflect current practices and policy directives.

#### Criteria

Under the COSO framework Control Activities component 3.6 "Top-level reviews of activities" review of organizational procedures is a fundamental element of an effective control environment.

#### Recommendation

The City Manager should require the Director of HRD to:

- 1. Update the PSM to complete missing sections 6.18 and 6.19.
- 2. Review the PSM on an annual basis to verify that it reflects current practices as required by PSM Chapter 1, Section 1 Subject 1, Page 4.
- 3. Review and revise the "Personnel Rules" on an ongoing basis to ensure the rules are accurate, up to date, and reflect current practices and policy directives.

The CAO further recommends that the City Manager require all department directors to:

- 1. Complete missing sections of the PSM such as 7.2, Chapter 10. and Chapter 12.
- 2. Review and revise their respective sections of the PSM annually as required by PSM Chapter 1, Section 1 Subject 1, Page 4.

#### **Management Response**

HRD is not aware of the reason for section 6.18 and 6.19; therefore, both sections should be deleted. HRD is responsible for Chapter 6 of the PSMs, not all of them, and does review Chapter 6 annually and make revisions as needed. In fact, the following provisions have been revised or added:

- 6.2.1 Employee Leave 6-30-08
- 6.2.5 Family and Medical Leave 7-21-08 (Nat'l Defense Auth Act effective date 1/28/08)
- 6.10.6 Violence in the Workplace 10/6/08
- 6.10.7 DOT Alcohol & Drug Testing Policy 4/2/07
- 6.14.1 Non-Service Incurred Disability Procedures 1/30/06
- 6.21.1 Gifts Upon Leaving Service of the City 5/27/09
- 6.31.1 Declared Emergency Conditions Compensation Policy (Addition to PSM) 6/12/06
- 6.32.1 Reporting of Overtime Worked (Addition to PSM) 9/25/06
- 6.33.1 Social Security Number Privacy Policy (Addition to PSM) 2/14/08
- 6.34.1 Take Our Sons & Daughters to Work Day (Addition to PSM) 12/5/08

HRD will review and suggest revisions of the Personnel Rules as directed by the City Manager.

#### **AUDITOR COMMENT 9.**

#### Condition

The CAO found that HRD does not publish a comprehensive employee handbook. Instead, HRD relies on the combined information contained in the specific union contracts, the PSM, and the Personnel Rules. These combined documents serve to provide information on many of the topics typically covered in the sample of employee handbooks reviewed by the CAO as well as best practice literature. However, the CAO noted that it was difficult and time consuming to research specific items from among the various sources, which collectively substitute for a traditional employee handbook. This is not a user-friendly method and can leave staff confused and without complete and accurate information.

#### Criteria

Under the COSO framework component 4.1 "Mechanisms that support information flow inside the organization" intranet websites and portals, and formal policy and procedure systems are standard elements of the internal control system.

#### Recommendation

The City Manager should require the Director of HRD to:

- 1. Create and publish an employee handbook and/or
- 2. Create a matrix by employee type and include hyperlinks on the HRD website that would serve to centralize and guide both union and non-union employees to pertinent information pertaining to the City's various policies and procedures as well as other important employee information.

#### **Management Response**

Employee handbooks typically contain various policies, including standards of conduct, such as workplace violence, discrimination, anti harassment, and benefits. While the City does not have one official document entitled "Employee Handbook", the previously described information can be found in the City's Personnel Rules, Policy and Standards Manual, Pay Plan Ordinance and the various collective bargaining agreements. The compilation of such information into one document would require a significant outlay of staff resources. Additionally, because an employee handbook is often the focus of employment related litigation, any compilation or drafting of a citywide employment manual would require the involvement of the City Attorney's office and/or outside counsel for constant review and updating. In light of the above, HRD does not agree with the CAO's recommendation.

#### REBUTTAL

The CAO feels strongly that employee handbooks are such an important resource as to be almost universal in their use. We are unaware of any organization of our size that fails to have a comprehensive handbook to educate and inform employees of their rights, benefits and obligations. While the production of such a resource may be time consuming and detailed, the benefits to the employees far outweighs the cost to the City.

#### **AUDITOR COMMENT 10.**

#### Condition

The CAO review of new employee orientation training provided by HRD within the first 30 days of hire revealed that the percentage of new employees who attend orientation training ranges from 72% to 90%. New hires are advised about the availability of orientation training based on a welcome letter provided with the hiring package. While attendance at an orientation session is not mandatory, major topics discussed should be made available online and acknowledged by all new employees.

#### Criteria

Under the COSO framework Internal or Control Environment component 1.2 "Commitment to competence" training and development efforts are standard elements of the internal control environment.

#### Recommendation

The City Manager should require the Director of HRD to:

- 1. Follow-up and inform employees who were unable to attend an orientation session that the topics discussed are available online.
- 2. Provide a hyperlink to orientation topics on the HRD website for those employees who were unable to attend the scheduled classes. Each of these employees should be required to provide an electronic signature indicating that they have read the on-line orientation material.

#### **Management Response**

Although some of the topics discussed during orientation are available online, many of the topics, such as the City's mission, values and policies, as well as benefits, should be discussed interactively with the new employee. HRD recommends that department directors require new employees to attend orientation.

#### **AUDITOR COMMENT 11.**

#### Condition

CAO found that the HRD website was adequate for communicating information relating to hiring, including application and job listings, benefits, and equal employment opportunity. However, the HRD website is not functioning as a comprehensive source of information for both internal and external users.

#### Criteria

Under the COSO framework Information and Communication component 4.2 "Mechanisms that support information flow outside the organization" external websites are a standard element of the internal control system.

#### Recommendation

The City Manager should require the Director of HRD to work in conjunction with the Information Technology Department to include information relating to the following topics on the HRD website:

- 1. Internships
- 2. Labor Agreements
- 3. Class and Compensation Schedule
- 4. City-wide Job Descriptions
- 5. Civil Service Board
- 6. I-9 Information
- 7. Name/Address Change
- 8. Diversity Information
- 9. Training Information
- 10. Administrative Rules/Policies
- 11. Employee Relations
- 12. Forms Library
- 13. Satisfaction Survey
- 14. Living In Fort Lauderdale.

#### **Management Response**

Establishing the HRD website as the comprehensive source of information for both internal and external users exceeds the core mission of the department. Much, if not all of this data, is currently available (or should be available) on websites of other departments or is available on the Intranet. Examples are listed below:

- 1. Internships posted on jobs list when offered
- 2. Labor Agreements Lauderdlink
- 3. Class and Compensation Schedule Lauderdlink
- 4. City-wide Job Descriptions AudreyC's S-drive, master specs folder
- 5. Civil Service Board Both Lauderlink (Personnel Rules) & City Website (City Clerk's Office, Summary of Boards & Committees)
- 6. Name/Address Change Lauderlink
- 7. Diversity Information HR website (Equal Opportunity & Affirmative Action Employer)
- 8. Administrative Rules/Policies Lauderlink (Personnel Rules, PSM, Labor Agreements)
- 9. Employee Relations Lauderlink (PSM, Section 6)
- 10. Forms Library Lauderlink (name change), HR website (application, veterans preference)
- 11. Living In Fort Lauderdale. City website (About Ft. Lauderdale)

While some of these documents, for example, collective bargaining agreements, certainly are public records, there should be further policy discussions regarding the posting of these agreements on a publicly accessible website. Finally, limited staffing resources within HRD prevents updating and/or maintenance of such information on the website.

#### **AUDITOR COMMENT 12.**

#### Condition

The City of Fort Lauderdale had not implemented a citywide employee suggestion awards program to help identify significant cost savings and other opportunities to improve the overall efficiency of the delivery of government services.

#### Criteria

Under the COSO framework Information and Communication component 4.1, "Mechanisms that support information flow inside the organization", employee suggestion boxes are standard element of the internal control environment.

#### Recommendation

The City Manager should require the Director of HRD to develop a employee awards program for adoption by the City Commission. Objective criteria should be developed and a suggestion awards committee established to evaluate and quantify the cost savings to the City as well as recommend an appropriate award.

**Auditor Note:** During the course of the audit, employee suggestion boxes were placed in various locations throughout the City; however, there hasn't been an update to the award policy.

#### **Management Response**

HRD implemented the Employee Suggestion Program in July 2009 at the request of the City Commission. The suggestions from the suggestion boxes are collected every two weeks and are submitted to the members of the City Commission for review and discussion. At the request of the City Commission, HRD is surveying other municipalities regarding employee "reward" programs for employees whose suggestions provide cost savings to the City, and will implement the programs recommended by the City Commission.

## Objective 6

To determine if employees are receiving adequate training necessary to their positions.

#### FINDING 10.

Condition

The CAO's review of the HRD training function revealed significant limitations to the types and amount of training provided as follows:

- The CFL does not have an established citywide policy encouraging the cross-training of departmental personnel. The Director of HRD explained that employee cross-training is performed at the departmental level and not monitored by HRD.
- HRD has not offered skills training to employees since 8/27/08. Skills training is performed at the department level (i.e. Police, Fire and Utilities have a training program).
- HRD has not provided supervisory training to management employees since 4/26/07.

#### Criteria

Under the COSO framework Internal Control Environment component 1.2 "Commitment to Competence", training and development programs are a standard element of an internal control system.

#### Cause

HRD has not:

- Prioritized Citywide employee cross-training.
- Filled vacant training positions within HRD.
- Required that supervisory training be completed by all managers.

#### *Impact*

Lack of a general Citywide policy to encourage employee cross-training and skills training is a significant weakness and exposes the City to the risk of workflow interruptions and inhibits job enrichment opportunities for the staff. In addition, the lack of required supervisory training for new and existing managers reduces management effectiveness and creates potential liability resulting from inexperienced managers violating labor laws, civil services rules or union contracts.

#### Recommendation

The City Manager should require the Director of HRD to:

- 1. Resume a training program in areas such as customer service, diversity, ethics, safety in the workplace, teambuilding, defusing hostility and other training applicable to all departments and staff.
- 2. Coordinate interdisciplinary educational training sessions to be conducted by experienced City professionals from various departments.
- 3. Require that all management employees receive supervisory training to improve their managerial skills in an effort to avoid exposing the City to liability.

#### **Management Response**

Due to budget constraints, HRD's Training Specialist position is not funded and in-house training programs have ceased; therefore, HRD and the Office of Professional Standards are exploring other options such as joint training with other municipalities, webinars and "Train the Trainer" programs.

## Objective 7

To determine whether HRD has thoroughly tested its Continuity of Operations Plan (COOP).

#### FINDING 11.

#### Condition

The CAO's review indicated that HRD's Continuity of Operations Plan is factually incorrect and has not been tested. Based on the aforementioned, we conclude that the Citywide plan has not been fully verified for accuracy and that comprehensive testing of the plan has not been completed.

#### Criteria

Under the COSO framework Control Activities component 3.1 "Responses that reduce or share specific risks" disaster recovery plans are a standard element of the internal control system. A comprehensive disaster recovery plan and periodic testing of that plan helps to demonstrate that essential City functions can be sustained in the event of an emergency and ensures the plan is viable and meets the needs of the City.

#### Cause

Management has not fully reviewed the contents of the COOP and has not performed a Citywide test to assure that the plan is executable and can sustain essential operations in the event of an emergency.

#### Impact

The COOP may not perform as designed on paper, which could cause the City to lack critical functionality to continue operations during the course of an actual emergency.

#### Recommendation

The City Manager should require the Emergency Manager to coordinate with all department heads to verify the accuracy of the COOP and make corrections as necessary. Moreover, the Emergency Manager should coordinate a Citywide testing of the plan to confirm that it is viable and executable prior to an actual emergency.

#### **Management Response**

HRD has secured an off-site location for activities in the event of an emergency and is completing the COOP Plan for the Emergency Manager.

## Objective 8

To determine if the goals published by HRD have corresponding accomplishments in the Annual Operating Budget.

The CAO found that HRD's goals didn't always tie to the reported accomplishments in the Annual Operating Budget nor did each of the departmental goals and objectives have a corresponding performance measure. For a more thorough discussion of the City's performance measurement system please see Audit Report 08/09-03.

#### **AUDITOR COMMENT 13.**

Condition

The CAO found that in Fiscal Year 06/07 HRD had a corresponding accomplishment for 10 of 14 goals (71%), but it was noted that 8 of the 10 goals corresponded to a single accomplishment. Additionally, the CAO found that in Fiscal Year 07/08, HRD had a corresponding accomplishment for 6 of 11 goals (55%).

#### Criteria

Under the COSO framework Risk Assessment - Objectives, Risks, and Responses component 2.2 "Activity and process-level objective setting", linkage to entity and strategic plans are a standard element of the internal control system. Additionally, COSO framework Information and Communication component 4.3 "Indicators and measurements", metrics, key performance indicators, measures and scorecards of performance are standard elements of the internal control system.

#### Recommendation

The City Manager should require the Director of HRD to review the department's goal and objectives and devise more meaningful measures to indicate progress towards the achievement of those objectives.

#### **Management Response**

Agreed.

**Engagement Staff:** 

James Hamill, Audit Manager Cole Copertino, Assistant City Auditor I Albert Ochs, Assistant City Auditor I