



AUDIT OF BOARD OF COUNTY COMMISSIONERS' PERSONNEL RECRUITING AND HIRING PROCESS

**DIVISION OF INSPECTOR GENERAL
Office of Tara S. Green
Clerk of Court & Comptroller
Clay County, Florida**

**Olga Rabel, CIG, CIGA, CIGI, CGFO
Inspector General**

Audit Team: Stephanie (Beth) Buford – IG Auditor

**Report NO. 2023-001B-A
July 11, 2024**



TARA S. GREEN, CLAY COUNTY CLERK OF COURT AND COMPTROLLER

825 N Orange Ave, PO Box 698, Green Cove Springs, FL 32043 / (904) 269-6302 / info@clayclerk.com / clayclerk.com

July 11, 2024

The Honorable Tara S. Green, Clerk of Court & Comptroller

The Honorable Chair and Members of the Board of County Commissioners

We have conducted a risk-assessed audit of the Board of County Commissioners Personnel Recruiting and Hiring Process.

We appreciate the cooperation shown by the staff of the Personnel Services' Department during the course of this audit.

Our audit was conducted in accordance with the *International Standards for the Professional Practice of Internal Audit* from the Institute of Internal Auditors and the *Principles and Standards for Offices of Inspector General* from the Association of Inspectors General.

Opportunities for improvement are presented in this report.

We hope you find this report useful in ensuring that the Clay County Board of County Commissioners' government is set up to provide the most reliable, effective and efficient services to its residents, adheres to the highest standards and complies with all applicable laws and regulations.

Respectfully submitted,

Olga Rabel, CIG, CIGA, CIGI, CGFO
Inspector General
Division of Inspector General, Clay County

Cc: Howard Wanamaker, County Manager
Troy Nagle, Assistant County Manager
Jessica Leighton, Director of Personnel

Table of Contents

INTRODUCTION.....	4
Executive Summary	4
Background	5
SCOPE AND METHODOLOGY.....	7
OBJECTIVES AND OUTCOMES	8
OPPORTUNITIES FOR IMPROVEMENT	9
1. <i>Written Policies and Procedures Were Outdated and Incomplete.</i>	9
2. <i>Veterans' Preference Was Not Processed According to the Requirements of F.S. 295 and F.A.C. Chapter 55A-7 for Eligible Applicants.</i>	11
3. <i>Drug Test Results Contained Timing Discrepancies in Processing.</i>	14
4. <i>Employees' Personnel File Documentation Was Missing from Employees' Files in Workday for New Hires.</i>	16
5. <i>Discrepancies in Posting Internal and External Open Position Advertisement.</i>	18
6. <i>Departments' Interviewing Panel Process is Not Consistent.</i>	19
7. <i>Promotion Was Processed During the Introductory Period.</i>	21
8. <i>Employees' Starting Pay Above the Minimum of Pay Grade Had No Support for Exceptional Consideration in Workday.</i>	22
ABBREVIATIONS.....	24
EXHIBIT A – Director of Personnel Memo	25

INTRODUCTION

Executive Summary

As part of the Annual Audit Plan, the Clerk of Court & Comptroller's Division of Inspector General audit team conducted an independent audit of the Board of County Commissioners (BOCC) Personnel Recruiting and Hiring Process.

The objectives of the audit were to:

- Perform a risk assessment to identify risks and vulnerabilities impacting the BOCC's personnel recruiting and hiring processes.
- Evaluate the overall efficiency and effectiveness of processes and related internal controls to mitigate risks.
- Assess whether controls are in place to facilitate compliance with pertinent laws and regulations as well as established BOCC personnel policies and procedures.
- Compare processes with accepted standards and best practices.

The audit scope included the review of the BOCC personnel recruiting and hiring processes from October 1, 2022, to present. During our conversations with the BOCC Personnel Services staff, it was determined that the BOCC implemented a Workday Recruiting module in the middle of the identified scope period. To provide the most value, per request from management, we concentrated most of the sampled operational procedures and processes after the Workday Recruiting module became operational.

The audit identified the following areas in recruiting and hiring procedures where existing policies are not aligned with the current processes utilized by the BOCC staff: posting of internal and external open positions, interviewing practices, promotion within introductory period, and starting pay above the minimum of pay grade rate. Furthermore, the audit found that the new hires' files lacked important compliance documentation such as the oath for public employees required by F.S. 876.05. It was also discovered that Veterans' Preference was not consistently processed according to the requirements of F.S. 295 and F.A.C. Chapter 55A-7.

During interviews with Personnel Services staff, it was noted that they are open to developing standardized recruiting and hiring procedures that will assist in creating a fair, efficient, and effective hiring process that attracts and retains top talent while complying with pertinent legal requirements.

In the Opportunities for Improvement section of this report, we provide recommendations to address deficiencies identified during our audit, and document management's plan of action which includes target completion dates and responsible staff.

Background

The BOCC Personnel Services Department is responsible for several critical functions including, but not limited to, personnel recruitment and hiring, job classifications and compensation rates, benefits, training and development, compliance, employee relations, and performance management. They are one of the key players in helping to ensure that the Good Governance Priority of the BOCC Strategic Plan to “...keep and attract a highly skilled Clay County employee workforce to provide the highest level of service to county residents and visitors. Ensure that the workforce is trained to perform their jobs at a high level” is on target.

The number of Personnel Services Department staff has increased over the last two years with the majority being hired since the implementation of the Workday Recruiting module. The Personnel Services Department currently consists of approximately eleven (11) employees. The Department is led by the Director of Personnel, Jessica Leighton. She is supported by three (3) direct reports. The recruiting and hiring related responsibilities are performed by the Human Resources Generalist and the Recruit and Development Coordinator, who are overseen by the Personnel Manager, Shannon Matyi. * The Personnel Services Department is overseen by one of the Assistant County Managers, Troy Nagle.

Personnel Services Turnover Statistics	FY 2022/2023	FY 2023/2024^
Average Employees for the Year	11	14
Total Separated Employees	1	5
Turnover Rate	9%	36%

^ Through 7/11/2024

The Personnel Services Department is funded by the General Fund and the FY 2023/2024 budget increased 65.33% over funds expended last fiscal year mainly in wages and salaries.

Department	FY 2022/2023 Actual	FY 2023/2024 Budgeted
Personnel Services	\$621,301.04	\$1,027,211.00

The Personnel Services staff oversee between 720 – 750 employees on average. They provide learning and development opportunities to employees of all levels to meet the BOCC goal for 95% of staff to receive at least 24 hours of training per year. The Personnel Services staff use Workday to house all employees’ files in electronic format.

* Highlighted in the Background information above to correspond with the Director of Personnel Memo (see Exhibit A).

PERSONNEL SERVICES STATISTICS (as reported in Workday)	As of 9/30/2023	As of 7/11/2024
EMPLOYEE DEMOGRAPHICS		
Total Employees	730	769
Full Time	708	732
Part Time	22	30
Temporary/Interns	0	7
ANNUAL TURNOVER STATISTICS		
Average Employees for the Year	681	746
Total Separated Employees	90	76
Turnover Rate	13%	10%

SCOPE AND METHODOLOGY

The scope of this audit included a review of the BOCC personnel recruiting and hiring processes. This function is centralized within the BOCC Personnel Services Department.

The audit covered Personnel Services Department activities beginning on October 1, 2022. Per management request during the entrance conference, we ensured that the selection of sampling data encompassed recent activities after the new Workday recruiting module was implemented. However, the review of process and documentation was not limited by the audit period and scope when deemed appropriate.

To meet the objectives, we performed the following:

- Interviewed the BOCC Personnel Department's management and staff to gain an understanding of the recruiting and hiring processes currently used by the department.
- Reviewed the BOCC 2018 Personnel Policies Manual and other documentation applicable to the recruiting and hiring process.
- Identified pertinent Florida Statutes and other laws and regulations.
- Evaluated the BOCC Personnel Services department compliance with all identified policies, statutes, laws and regulations.
- Performed a risk assessment to identify key risks and vulnerabilities and evaluated the adequacy of the internal control environment to mitigate the risks identified.
- Performed on-site observations of the onboarding process.
- Examined the functionality of Workday business processes that support the recruiting and hiring activities of the staff.
- Sampled the flow of the recruiting and hiring business processes within Workday to ensure internal controls were designed effectively and operated as intended.
- Reviewed department's performance accomplishments and relevant statistics presented to the BOCC and public in the annual budget documents and strategic plan.

OBJECTIVES AND OUTCOMES

The objectives of the audit were to:

- Evaluate the overall effectiveness and efficiency of the BOCC personnel recruiting and hiring process.
- Assess whether current business processes and procedures implemented with Workday align with the adopted BOCC 2018 Personnel Policies Manual.
- Assess whether controls are in place to facilitate compliance with pertinent laws and regulations as well as the adopted BOCC 2018 Personnel Policies Manual.
- Identify risks and vulnerabilities impacting the BOCC personnel recruiting and hiring processes.
- Evaluate the overall effectiveness and efficiency of processes and related internal controls implemented by management to mitigate risk.
- Evaluate the overall accuracy of the recruiting and hiring documentation.

As a result of the audit, we determined that the BOCC Personnel Services Department staff carried out recruiting and hiring functions with consideration to adhere to pertinent laws, regulations and internal policies though opportunities for improvement were further noted in this report. Staff shared their accomplishments in redesigning the orientation day into a three-day program that allows new hires to complete all onboarding administrative tasks prior to beginning their duties within their department. This allows the new hires' manager to concentrate their time on training the new employee for job-related functions without interruptions for administrative paperwork. New hires also receive training to support the BOCC efforts as an equal opportunities' employer. However, our review of the present practices and the adopted BOCC 2018 Personnel Policies Manual indicated that some policies are outdated and require revisions to align with practiced business processes. Furthermore, some processes and procedures are not aligned with statutory requirements. The Personnel Services staff need to ensure documents are in compliance with pertinent laws, regulations, and internal policies.

This audit was conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing* from the Institute of Internal Auditors and the *Principles and Standards for Offices of Inspector General* from the Association of Inspectors General, and accordingly, included such tests of documentation and other auditing procedures, as we considered necessary in the circumstances.

OPPORTUNITIES FOR IMPROVEMENT

Our audit disclosed certain policies, procedures, and practices that could be improved and/or corrected to gain efficiencies and ensure compliance with applicable laws and regulations. Our audit was neither designed nor intended to be a detailed study of every relevant system, procedure, or transaction. Therefore, opportunities for improvement and/or corrections presented in this report are not all-inclusive of other areas where improvements may be needed.

1. Written Policies and Procedures Were Outdated and Incomplete.

During the audit, we noted that the Personnel Policies Manual posted on the Board of County Commissioners (BOCC) website www.claycountygov.com was last updated and approved by the BOCC on March 27, 2018.

Written policies and procedures provide the guidance necessary to consistently and adequately carry out BOCC departmental activities at the required level of quality, efficiency and effectiveness that is approved by the governing body in accordance with the applicable laws and regulations. Establishing procedures ensures that adequate processes and internal controls have been implemented by management. Procedures are a guide to essential staff functions, and they support cross-training. The procedures should be sufficient to provide standard performance criteria and reduce the risk of unauthorized deviations that could cause processing errors and lead to unnecessary waste of BOCC resources.

The Committee of Sponsoring Organizations of the Treadway Commission (COSO) Internal Control – Integrated Framework provides 17 principles of effective control. The COSO control principles are organized into five integrated components, one of which relates to control activities. In the Executive Summary for COSO Internal Control – Integrated Framework, it is cited that “...control activities are the actions established through policies and procedures that help ensure that management’s directives to mitigate risks to the achievement of objectives are carried out. Control activities are performed at all levels of the entity, at various stages within the business processes, and over the technology environment.” One of the control activities’ principles highlights the importance of policies and procedures as follows: “...the organization deploys control activities through policies that establish what is expected and procedures that put policies into action.”

Since 2018, various labor laws and regulations have changed. In 2022, internal processes of handling personnel became automated with the implementation of Workday. During the entrance conference on December 20, 2023, and follow-up communications with management and Personnel Services staff during the first five months of 2024, we inquired whether any updates to

the 2018 Personnel Policies Manual are planned. Management stated that staff were considering revising the Manual, and had made attempts to do so, but at the time of the inquiries they did not have a revised document approved by the BOCC. The Director of Personnel provided us with a document titled “Clay County Board of County Commissioners Personnel Policies Manual – DRAFT 11-2023” which contained revision comments and questions from staff. We noted that staff attempted to begin revisions of the 2018 Personnel Policies Manual beginning in 2023.

The audit team also discovered PO-1002037 opened to supplier Constangy, Brooks, Smith & Prophete, LLP for the revisions of the 2018 Personnel Policies Manual on 7/25/2022. PO-1002037 was not expended and was closed on 6/12/2024 by the Purchasing Department. We also reviewed this supplier’s invoices that were paid without opening a purchase order and identified three paid invoices for the review and update of the personnel policy manual (also referenced as handbook and/or employee handbook) and separate personnel related policies (i.e. drug testing policy, religious accommodation policy). The total funds expended with the supplier on related tasks is \$5,752.50.

Invoice #	Invoice Task Date and Description	Time Spent by Constangy, Brooks, Smith & Prophete, LLP Staff	Amount Paid by the BOCC for Task
630420	6/14/2023 Handbook Review	n/a	\$3,500.00
659126	6/12/2023 Begin Review of Revised Personnel Policies	0.50 hours	\$132.50
	6/13/2023 Continue Review of Personnel Policies	0.10 hours	\$26.50
	6/15/2023 Begin Review of Drug Testing Policy	1.50 hours	\$397.00
	6/17/2023 Continue Review of Handbook	0.50 hours	\$132.50
842909	5/5/2024 Review and Revise Employee Handbook	1.80 hours	\$477.00
	5/6/2024 Review and Revise Personnel Manual	3.20 hours	\$848.00
	5/9/2024 Emails with Jess Leighton re: Handbook Review	0.40 hours	\$106.00
	5/9/2024 Revise Religious Accommodation Policy	0.50 hours	\$132.50
	Total:		\$5,752.50

We inquired with the Assistant County Manager responsible for the Personnel Services Department about the purchase order and paid invoices for Constangy, Brooks, Smith & Prophete, LLP. We were not provided with any details or to what extent the supplier is involved in the revisions.

We Recommend Management:

Revise written policies and procedures of the 2018 Personnel Policies Manual to incorporate recent changes in the laws, regulations, and internal business processes to avoid liabilities associated with the outdated governing policy. Consider recommendations for improvements/corrections incorporated in this audit report as you work on the revision.

Management Response:

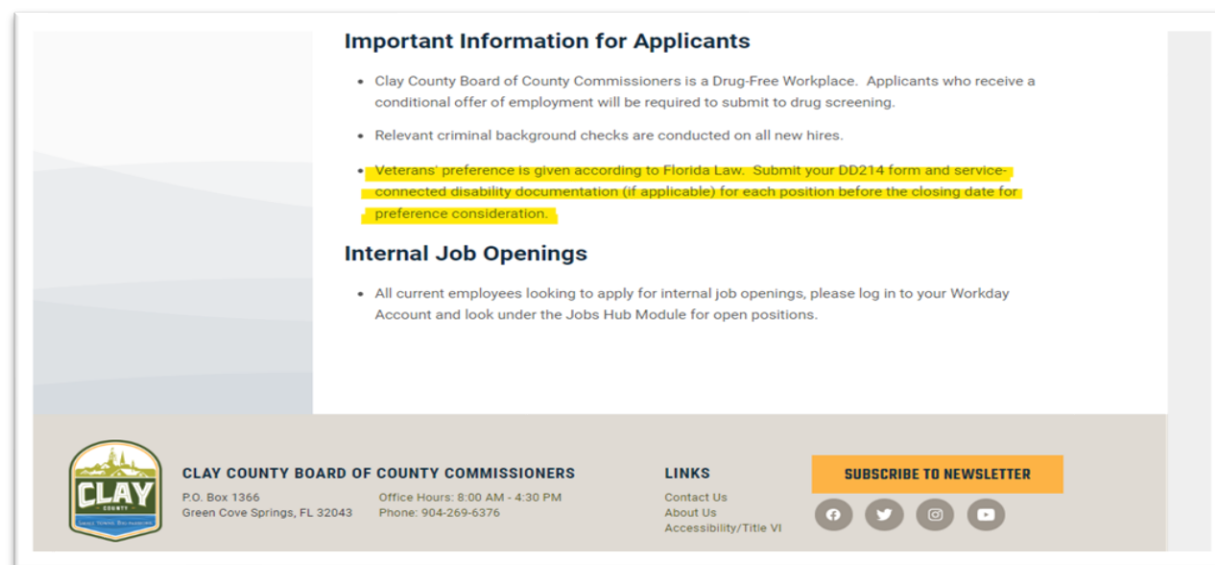
The Personnel Department concurs with the audit recommendation that the Clay County Board of County Commissioners Personnel Policy needs to be updated. As indicated in the report, the Personnel Department has worked with the County Manager and Assistant County Managers, as well as outside council to make these updates to the Policy Manual. The revised Policy will be brought to the Board of County Commissioners on August 27, 2024, for approval. Updates to the Policy Manual do not impact union members at this time, applicable changes will be made when the union ratifies a new contract.

Management Action Plan	Responsible Employee(s)	Target Date
Personnel Policy has been updated and will be brought to the 8/27/24 BCC Meeting for approval.	Jessica Leighton	August 27, 2024 – BCC Meeting

2. Veterans’ Preference Was Not Processed According to the Requirements of F.S. 295 and F.A.C. Chapter 55A-7 for Eligible Applicants.

Our review disclosed that the 2018 Personnel Policies Manual does not address Veterans’ Preference requirements. The BOCC webpage titled Application Process provides the statement “Veterans’ Preference is given according to Florida Law” and directs applicants to submit supporting documentation (i.e. DD214 form, etc.)

Figure 2 “Clay County BOCC Application Process”



F.S. 295.065 requires “...all written job announcements and audio and video advertisements used by employing agencies of the state and its political subdivisions [i.e. BOCC] must include a notice stating that certain servicemembers and veterans, and the spouses and family members of such servicemembers and veterans, receive preference and priority, and that certain servicemembers may be eligible to receive waivers for postsecondary educational requirements, in employment by the state and its political subdivisions and are encouraged to apply for the positions being filled.”

Furthermore, F.S. 295.07(6)(a) requires that “each state agency and political subdivision shall develop and implement a written veterans’ recruitment plan that establishes annual goals for ensuring the full use of veterans in the agency’s or political subdivision’s workforce. Each veterans’ recruitment plan must be designed to meet the established goals.”

F.A.C. Chapter 55A-7.009 requires the employer [BOCC] to inform preference-eligible applicants at the time of application of the right to an investigation by the Florida Department of Veterans’ Affairs if a non-preference-eligible applicant is appointed to a position, the time limits and address where the request for investigation should be sent. The employer is required to document and justify the decision to hire a non-preference eligible applicant over the preference-eligible applicant pursuant to F.A.C. Chapter 55A-7.009(6).

If a non-selected preference-eligible applicant pursues the right to investigation and an administrative determination, the Public Employees Relations Commission determines whether a violation of F.S. 295.07 and/or any other corresponding sections of Chapter 295, F.S. has occurred. The Commission may issue an order to compensate the veteran for the loss of any wages and attorney’s fees (F.S. 295.14).

Our review disclosed that for seven (7) sampled requisitions for recently filled positions the following occurred:

Position Job Requisition	Number of Total Rejected Applicants	Number of Rejected Applicants Who Asserted Veterans' Preference	Number of Rejected Interviewed Applicants Who Asserted Veterans' Preference
Administrative Assistant I - Public Safety	78	7	2
Budget Analyst	16	2	0
Community Services Case Specialist I	19	4	0
Park Ranger	18	5	5
Revenue Budget Analyst	14	1	0
Senior HVAC Technician	5	2	0
Tourism Program Manager	24	2	1

Applicants' files do not have any documentation supporting rejection of veterans' applicants prior to or after the interview. F.S. 295.085 requires the first preference in employment to be given to a person included under Section 295.07(1)(a) or (b) F.S. who possesses minimum qualifications necessary to discharge the duties of the position involved and the second preference to a person included under Section 295.07(1)(c), (d), (e), (f) or (g) F.S.

We Recommend Management:

Update written policies and procedures of the 2018 Personnel Policies Manual to include Veterans' Preference requirements of Chapter 295, F.S. and F.A.C. Chapter 55A-7 to process Veterans' Preference eligibility, waiver, preference and priority.

Update BOCC recruitment webpages to provide required Veterans' Preference information to the applicants at the time of application process.

Develop a business process that provides guidance to the hiring manager on the requirements when reviewing and interviewing applicants who assert Veterans' Preference.

Develop and implement a written veterans' recruitment plan that establishes an annual goal for ensuring the full use of veterans in the county workforce as required by F.S. 295.07(6)(a).

Management Response:

The Personnel Department concurs with the Audit recommendation that the Personnel Policy should be updated to include Veterans' Preference requirements of Chapter 295, F.S. and Chapter F.A.C. 55A-7.

Management Action Plan	Responsible Employee(s)	Target Date
<p>Changes to Procedures include the following:</p> <ul style="list-style-type: none"> A. Revise job postings to include the required information per Florida Statutes. B. Ensure that the departments are aware of applicants that meet the requirements of Veterans' Preference and interview those that meet the requirements. C. Improve documentation for those not selected for a position in which they have asserted Veterans' Preference. D. Develop a written veterans' recruitment plan as required by Florida Statute. 	Jessica Leighton	<ul style="list-style-type: none"> A. 10/01/24 B. Complete C. 12/31/24 D. 04/30/25

IG Comment:

We encourage the Personnel Department to establish a process that provides guidance on an ongoing basis to the hiring managers as they review applicants and interview those who have asserted Veterans' Preference (see Section B in Management Action Plan above).

3. Drug Test Results Contained Timing Discrepancies in Processing.

During our review of supporting documentation for successful applicants, it was noted that drug screening results received from the supplier, ClayMed of North Florida, LLC (Contract No. 2023/2024-69), and titled "Medical Review Officer Report" included the discrepancy of the verification of results happening prior to collection of the specimen.

Figure 3. Discrepancy in time stamping

Collected Date/Time:	03/26/2024 01:27 PM
Lab Reported Date:	03/26/2024
MRO Received Date:	03/26/2024
MRO Date CCF2:	
MRO Verification Date:	03/26/2024 12:51 PM
MRO Report Date/Time:	03/26/2024 12:51 PM

Figure 4. Correct sequence in time stamping

Collected Date/Time: 01/03/2024 08:26 AM
Lab Reported Date: 01/03/2024
MRO Received Date: 01/03/2024
MRO Date CCF2:
MRO Verification Date: 01/03/2024 11:26 AM
MRO Report Date/Time: 01/03/2024 11:26 AM

Collected Date/Time: 02/02/2024 08:55 AM
Lab Reported Date: 02/05/2024
MRO Received Date: 02/05/2024
MRO Date CCF2:
MRO Verification Date: 02/05/2024 05:27 PM
MRO Report Date/Time: 02/05/2024 05:27 PM

We reviewed a sample of thirty (30) Medical Review Officer Reports during period of October 2023 to April 2024 and observed the following results:

Total Sample Size	Reports with the Correct Sequential Order Time Stamps for Collection and Reporting	Reports with Time Discrepancies in Time Stamps for Collection and Reporting
30	4	26

Note: Out of four (4) reports with the correct sequential order of time stamps for collection and reporting, two (2) collected specimens were processed and reported on the same day and two (2) collected specimens were collected on one day and reported several days later; for all twenty-six (26) reports with time discrepancies, the collected specimens were processed same day.

We Recommend Management:

Consider discussing discrepancies with the supplier to ensure compliance with requirements of all applicable laws, regulations, policies and procedures including but not limited to F.S. 112.0455 Drug-Free Workplace Act and F.A.C. 59A-24 Drug-Free Workplace Standards.

Establish procedures for staff assigned to review pre-employment drug screening reports to ensure reports are accurate and in compliance with all applicable laws, regulations, policies and procedures.

Management Response:

The Personnel Department concurs with the Audit recommendation that timing discrepancies were present in some Medical Review Officers Reports provided by ClayMed of North Florida, LLC for drug screening of new employees.

Management Action Plan	Responsible Employee(s)	Target Date
ClayMed of North Florida, LLC is no longer the main vendor used at the County for drug screenings. As of 07/01/2024, the County plans to use Ascension and Carespot for drug screenings when possible.	Jessica Leighton	Complete

4. Employees' Personnel File Documentation Was Missing from Employees' Files in Workday for New Hires.

During the audit entrance conference on December 20, 2023, as well as the interviews with the Personnel Services staff, we were advised that all employees' files are now in electronic format inside Workday with one exception being successful applicants' references that are stored on a Personnel Services' shared drive (F-Drive). We selected thirty (30) newly hired employees who completed the onboarding process during the period of June 2023 to June 2024 and reviewed the status of the documents in employees' files for three of the required documents that must be completed prior to beginning employment: employee's physical evaluation, employee's drug screening results and oath for public employees.

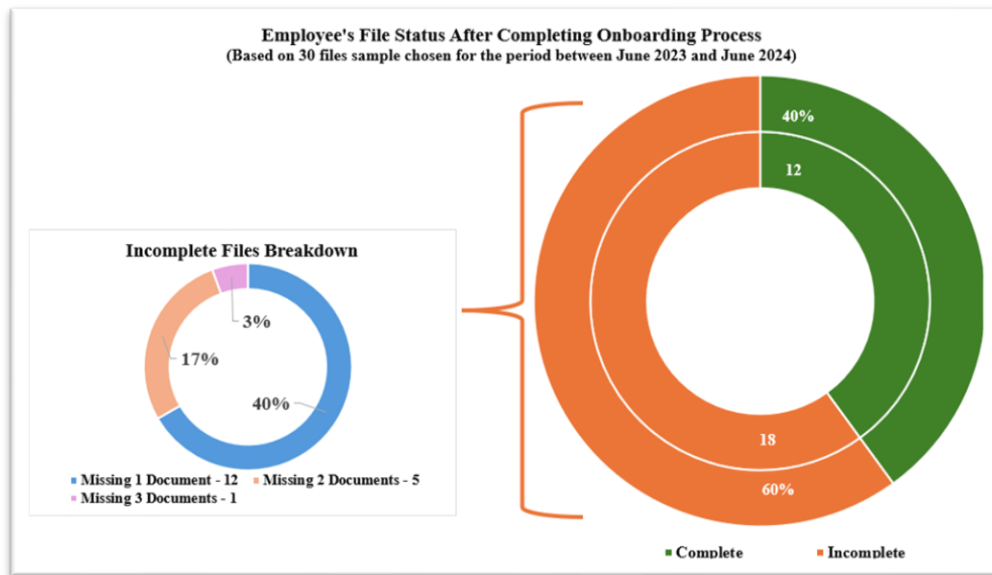
The 2018 Personnel Policies Manual Section 2.04 A. states that "...medical examination will be conducted during the conditional offer stage (i.e., post- offer but pre-employment). ...If the pre-employment medical examination reveals that the applicant cannot perform the essential requirements of the position for which he or she has received an offer of employment with reasonable accommodation by the County then the offer will be withdrawn." It also addresses the pre-employment drug testing and provides that "Failure to pass a pre-employment drug test will result in retraction of job offer."

F.S. 876.05(1) requires that "all persons who now or hereafter are employed by or who now or hereafter are on the payroll of the ... counties... are required to take an oath before any person duly authorized to take acknowledgements of instruments for public record in the state..." Furthermore, F.S. 876.05(2) states that "said oath shall be filed with the records of the governing official or employing governmental agency prior to the approval of any voucher for the payment of salary, expenses, or other compensation."

The results of our review of the selected employees' files are presented below: 40% of reviewed files had all three documents uploaded; the remaining 60% have incomplete files in which more than half did not have a physical evaluation report uploaded and 39% equally missed the oath for public employees and/or drug screening report.

Employees' Grouping	Employees' Count
Total Employees' Files Sampled for Review	30
Total Employees' Files with all Three (3) Documents Present	12
Total Employees' Files Missing One or More Documents	18
Total Employees' Files Missing Drug Screen Report	7
Total Employees' Files Missing Physical Evaluation Report	11
Total Employees' Files Missing Oath for Public Employee	7

Figure 5. Employee's File Status After Completing Onboarding Process



We Recommend Management:

Develop a checklist that includes all documents that are required to be in all employees' personnel files. Assign quality control review as a task for the Personnel Services staff and establish a timeframe to review files for accuracy.

Management Response:

The Personnel Department does not concur with the Audit findings that stated the Personnel Policy and Florida State Statute was violated. For all samples selected, the Personnel Department had properly obtained the required Drug Screening Report, Physical Evaluation Report, and Oath for Public Employee.

The Personnel Department concurs that in some instances of selections sampled, the above-mentioned reports were not uploaded to the employee file within Workday in a timely manner; however, all instances of selections sampled were readily available.

Management Action Plan	Responsible Employee(s)	Target Date
<p>A. The Personnel Department has implemented a two-person process to review each personnel file. The primary recruiter is responsible for the file, while a second recruiter will double check to make sure all files are properly loaded.</p> <p>B. In addition, the County will conduct their own audit of the last year of employees to ensure that all applicable files are attached to all new employee files.</p>	Jessica Leighton	<p>A. Complete</p> <p>B. 04/30/25</p>

IG Comment:

We encourage the Personnel Department to update the known sampled employees' files with deficiencies as soon as possible to avoid misplacing documentation or shredding before uploading. During the entrance conference and interviews with the Personnel Department employees, auditors were assured that all required personnel documentation is now in electronic format. When paper documents are provided, they are immediately scanned, electronic record is uploaded in Workday and paper document is shredded. The only exception are the successful applicants' references that are stored on one of the Personnel Department's shared drives.

5. Discrepancies in Posting Internal and External Open Position Advertisement.

The 2018 Personnel Policies Manual Section 2.11 states "it is the policy of the Board of County Commissioners to consider County employees for promotional opportunities before applicants from the general public are considered. Promotional opportunities...may be posted in the County office building for a minimum of three (3) days and County Commission employees will have the right to apply for these positions for three (3) additional days..."

During the interviews, Personnel Services staff indicated that currently all positions are advertised through Workday, and employees are instructed to review open positions in Workday under Jobs Hub Module (see Figure 6).

Figure 6. BOCC Application Process Webpage Instructions

Internal Job Openings

- All current employees looking to apply for internal job openings, please log in to your Workday Account and look under the Jobs Hub Module for open positions.

The data in Workday identified fifty-five (55) positions with a “Recruiting Start Date” during the period of January 2024 to May 2024. We selected approximately 50% of these positions to review their internal and external “Posting Start Date.” Both internal and external postings were initiated in Workday on the same day for each position in the sample group.

We Recommend Management:

Consider reviewing the timeframe of posting positions for internal and external applicants to align policies and procedures with the BOCC’s intent to encourage the promotion of qualified employees within the organization.

Management Response:

The Personnel Department does not concur with the Audit finding stating that the Personnel Policy was violated in regard to internal and external posting dates. As noted in the Personnel Policy, that job opportunities may be posted for a minimum of three (3) days; however, this is not a requirement.

Management Action Plan	Responsible Employee(s)	Target Date
No Action is required. This section in the updated BCC Policy Manual has been removed.	Jessica Leighton	N/A

6. Departments’ Interviewing Panel Process is Not Consistent.

In Section 12.01A.2. of the 2018 Personnel Policies Manual, it is stated that Personnel Services staff “...shall establish and maintain the employment process for the County and will be responsible for: ...interviewing, testing (where appropriate), background investigating and otherwise prequalifying all candidates for County employment...” During our interviews with Personnel Services staff about the current procedures within recruiting and hiring, hiring managers were identified as the party responsible for the interview process. This process is conducted within the Workday Recruiting Module, and the hiring managers are responsible for scheduling, conducting, and rating each applicant’s interview. While Personnel Services staff noted they believe it would be beneficial for departments to include a Personnel Services representative in their interview panel, it is not mandatory at the present time.

Interviews are one of the critical phases in the hiring process and offer insight into an applicant’s capabilities and fit for the job. However, interviews can also be a stage where biases and discrimination inadvertently surface. According to multiple sources, a panel of interviewers may be a better approach that will allow them to document and interpret the information to minimize the risk of biases in ratings. Also, a diverse range of interviewers indicates to the applicants that the organization values diversity and fair treatment. Including a Personnel Services representative on the interview panel helps the organization ensure that the interview process complies with both state and federal employment laws.

We sampled the interview stage documentation for approximately 50% of employees hired during the period of January 2024 to June 2024 to identify how often departments used the interview panel approach and whether a Personnel Services representative was included in the panel.

Total Number of Interviews Conducted During the Period of January 2024 to June 2024	New Hires Who Were Hired Without Interview	New Hires Who Were Interviewed by Hiring Manager Only	New Hires Interviewed by a Panel of 2 Interviewers from the Department	New Hires Interviewed by a Panel of 3 or More Interviewers from the Department
34	3 applicants (9%)	6 applicants (18%)	9 applicants (26%)	16 applicants (47%)

The results identified that 91% of new hires had their interview with either the hiring manager or a panel of the hiring department's staff. There was no consistency in the way the interview ratings were documented in Workday. In the sampled group, it was noted that a Personnel Services representative was not included in the interview panel.

We Recommend Management:

Develop a standard procedure for conducting job interviews and consider including a Personnel Services representative to participate in the interviewing of job applicants for BOCC positions. Having a standardized interview process will ensure that all job applicants are evaluated based on the same criteria and procedures. A standardized process will make hiring more consistent and objective and reduce the risk of bias or discrimination. It will save time and resources for the BOCC by streamlining the hiring process and increasing efficiency.

Management Response:

The Personnel Department concurs that the department interviewing panel process is not consistent. The current process of departments conducting all phases of the interview process from scheduling through selection varies. Personnel has requested an extra FTE so they may provide a recruiter in every interview to help standardize the interview and selection process.

Management Action Plan	Responsible Employee(s)	Target Date
<p>The Personnel Department has implemented the following procedures:</p> <p>A. All hiring managers have been advised to send their standard questions to Personnel to review and provide a comment</p>	Jessica Leighton	A. Complete

- B. Personnel has made themselves available to participate in interviews on an optional basis
- C. Personnel will fully participate in all interviews

B. Complete

C. 04/30/25

7. *Promotion Was Processed During the Introductory Period.*

During our review of the BOCC “County Job” webpage, it was noted that a filled full-time position was advertised as an open vacant position through a new open job requisition. Further review of the supporting documentation in Workday led us to believe that the observance of the introductory period of 90 days was inconsistent with the 2018 Personnel Policies Manual. Section 2.02.A, Introductory Period, of the 2018 Personnel Policies Manual states “The first three months (90 calendar days) of County service, promotion or transfer shall be considered an introductory period for all employees. ... During introductory period employees are not eligible to apply for other Clay County Board of County Commissioners positions.” Section 2.07, Lateral Transfers, of the 2018 Personnel Policies Manual further confirms that “...No transfer may be made during an introductory period.”

Documentation in the employee’s file in Workday indicates that a full time BOCC employee was transferred and/or promoted to a different role within 60 days of employment. Further review of documentation in Workday identified two other instances where employees applied for a different position during the introductory period but were found not eligible for the position based on the introductory period they were in at the time of application.

We Recommend Management:

Review introductory period promotion restrictions to confirm that the process is aligned with the current and future BOCC recruitment plans.

Ensure that any deviations from the approved policy are properly documented to avoid potential for criticism, grievances, and/or costly legal actions.

Management Response:

The Personnel Department concurs with the Audit recommendation to review the Personnel Policy regarding promotions and transfers during 90-day introductory period. However, the policy will be updated from a 90-day probation period to 180-day probation period.

Management Action Plan	Responsible Employee(s)	Target Date
The Personnel Policy will be updated to include a provision where the County Manager can approve transfers/promotions during 180-day introductory period.	Jessica Leighton	08/27/24

8. *Employees' Starting Pay Above the Minimum of Pay Grade Had No Support for Exceptional Consideration in Workday.*

During our interviews with the BOCC's Director of Personnel, she stated that the starting pay for a new hire is determined by various factors including but not limited to compensation study, applicant's experience, and/or skill level. The Director of Personnel conducts negotiations on the starting pay amount with the potential new hire. If an agreement is not reached, the next successful applicant for the position is contacted.

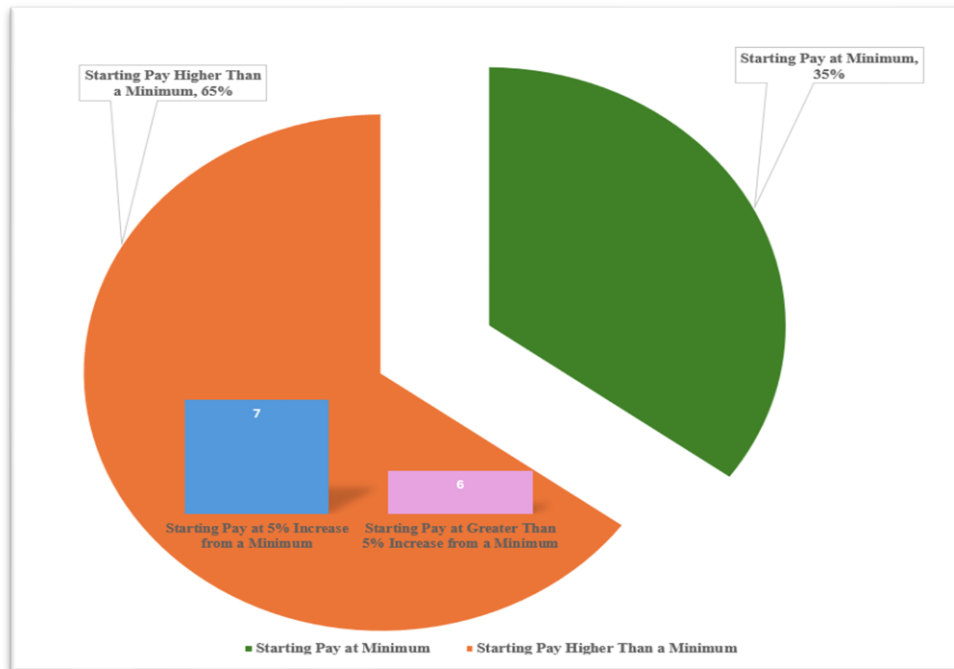
Section 3.01A. of the 2018 Personnel Policies Manual states that "an employee entering the County work force will normally start at the minimum of the pay grade assigned to his/her classification. When there are exceptional considerations, an employee may start above the minimum with the recommendation of the Department Head, the Human Resources Director, and approval of the County Manager."

We sampled employees' files for twenty (20) newly hired employees and 35% of our sample group were hired at the minimum rate starting pay, 65% were hired at least 5% or higher than minimum rate starting pay. There are no memos in the employees' files to document the exceptional considerations used to support the offered increase above the minimum starting pay rate.

Employee	Position's Starting Pay	Employee's Starting Pay	% Increase
Employee 1	\$15.00	\$15.00	0%
Employee 2	\$15.00	\$15.00	0%
Employee 3	\$20.10	\$20.10	0%
Employee 4	\$21.22	\$21.23	0%
Employee 5	\$17.36	\$17.37	0%
Employee 6	\$16.53	\$16.54	0%
Employee 7	\$16.53	\$16.54	0%
Employee 8	\$15.00	\$15.75	5%
Employee 9	\$15.00	\$15.75	5%
Employee 10	\$15.00	\$15.75	5%
Employee 11	\$15.75	\$16.54	5%
Employee 12	\$20.10	\$21.11	5%
Employee 13	\$17.36	\$18.24	5%
Employee 14	\$16.53	\$17.37	5%

Employee 15	\$28.25	\$30.02	6.28%
Employee 16	\$28.25	\$30.02	6.28%
Employee 17	\$21.22	\$22.56	6.31%
Employee 18	\$21.22	\$23.88	12.54%
Employee 19	\$21.22	\$23.88	12.54%
Employee 20	\$18.24	\$20.97	14.97%

Figure 7. Employee's Starting Pay Sampling Results



We Recommend Management:

Review starting pay policy to confirm that it is aligned with the BOCC recruitment plans. Develop a way to document “exceptional considerations” that bring the offered starting pay over the minimum rate. This documentation should ensure that potential new hires receive fair, competitive compensation based on uniform criteria. Standardizing the compensation negotiation process provides for consistency, reduced risk and increased efficiencies.

Management Response:

The Personnel Department does not concur with the Audit finding stating that the Personnel Policy was violated in regard to proper documentation for employee's starting pay above the minimum. As noted in the Audit Report, the Policy states “When there are exceptional considerations, an employee may start above the minimum with the recommendation of the Department Head, The Human Resources Director, and approval of the County Manager.” In all employees sampled, where starting pay was above minimum pay, the County Manager approved the hiring of each employee, including the starting salary. This is all documented in Workday.

Management Action Plan	Responsible Employee(s)	Target Date
No Action Needed	N/A	N/A

IG Comment:

We encourage the Personnel Department to consider developing a way to document “exceptional considerations” that bring the offered starting pay above the minimum rate as an addition to County Manager approval. One of the practices in the industry is to create a matrix, that allows employers to document potential employees’ “exceptional” values in education, skills, experience, etc. over the minimum requirements for the position. This documentation will help to ensure that potential new hires receive fair and competitive compensation based on uniform criteria. Standardizing the compensation negotiation process provides for consistency, reduced risk and increased efficiencies.

ABBREVIATIONS

(Insert table here with two columns: abbreviation and full name)

BOCC	Board of County Commissioners
COCC	Clerk of Court and Comptroller
COSO	The Committee of Sponsoring Organizations of the Treadway Commission
County	Clay County
F.A.C.	Florida Administrative Code
F. S.	Florida Statutes
FT	Full Time
FY	Fiscal Year
IG	Inspector General
PT	Part Time
Workday	Workday system – County ERP system

EXHIBIT A – Director of Personnel Memo



Personnel and Benefits
Division

Physical Address:
477 Houston Street,
Green Cove Springs,
Florida 32043

Mailing Address:
P. O. Box 1366,
Green Cove Springs,
Florida 32043

Phone: 904-278-4719
904-529-4719
Fax: 904-278-3616

County Manager
Howard Wanamaker
Commissioners:

Mike Cella
District 1

Alexandra Compere
District 2

Jim Renninger
District 3

Betsy Condon
District 4

Kristen Burke, DC
District 5

www.claycountygov.com



08/07/2024

To: Olga Rabel, Inspector General

CC: Howard Wanamaker, County Manager
Troy Nagle, Assistant County Manager
Stephanie (Beth) Buford, IG Auditor

From: Jessica Leighton, Director of Personnel

Management Responses to the Personnel Recruitment and Hiring Process

In the background information, the overall budget for the Personnel Division, includes costs not only directly related to recruiting and hiring. These costs include the newly established Leadership & Development Division and the intern program, with all intern salaries paid from the Personnel budget to simplify administrative processes.

Regarding staffing, the data from Workday shows FTE's that are not direct functions of recruiting and hiring; such as: interns, front desk staff, L&D personnel, benefits & wellness and the courier are all under the Personnel Department. A more accurate number to represent the staffing for recruiting and hiring, would be four, as the only members that are directly tied to recruiting and personnel management functions are the Director, Personnel Manager, and two recruiters.