city of CINCINNATI

Date: August 11, 2026

To: Sheryl M.M. Long, City Manager

From: Lauren Sundararajan, CFE, Internal Audit Manager *LS*

Copies to: Internal Audit Committee
Andrew Dudas, Budget Director
Latisha A. Hazell, Director, Department of Human Resources

Subject: **Hiring Practices Audit**

Attached is the Hiring Practices audit report. The primary objectives of this performance audit were to evaluate the City of Cincinnati's (City) internal controls over the hiring process; and to determine whether the Human Resources Department (HRD) is effectively and efficiently conducting hiring practices in accordance with all applicable regulatory and legislative requirements. This audit was conducted in accordance with the current audit agenda.

We would like to thank the management and staff of HRD for their assistance and cooperation during this audit.

If you need any further information, please contact me.

Attachment

Hiring Practices Audit

August 2026

city of CINCINNATI INTERNAL AUDIT

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Executive Summary

Internal Audit (IA) conducted a performance audit of the Human Resources Department's (HRD) hiring practices. The primary objectives of this audit were to evaluate the City of Cincinnati's (City) internal controls over the hiring process; and to determine whether HRD is effectively and efficiently conducting hiring practices in accordance with all applicable regulatory and legislative requirements.

HRD plays a vital role in the recruitment, selection, and hiring of qualified talent. The audit revealed several opportunities for strengthening internal controls over HRD operations. For instance, IA determined that there is no central repository of all applicable regulations over the hiring process. While department policies and procedures are available to HR staff on the City website, other critical documents such as hiring maps and letters of agreement are not. IA also found that policies and procedures should be updated, expanded, and documented to reflect current operations. For instance, Citywide HR standard operating procedures (SOPs) on the City's HR website have not been updated since 2014. Additionally, these SOPs do not include, at minimum, procedures for checking references, reviewing applicants who were terminated from the City for cause, and interviewing and hiring panels for positions under the supervisor level.

IA reviewed 59 new hire files and determined that file maintenance is inconsistent Citywide. Additionally, during testing of these files, IA was unable to locate essential documentation such as I-9s, tax withholding forms, ok-to-hire emails from Employee Health Services (EHS), and background checks for 18 (31%) hires. Further, files for 2 terminated employees were not retained.

IA determined that opportunities to improve oversight by HRD exist. For instance, HRD does not perform periodic audits of personnel files: IA determined that 32 new hire files (54% of 59 files) were missing essential documentation such as tax withholding information, classification specifications, and emergency contact forms. Additionally, personnel files in one department were not secure.

IA found that interdepartmental communication can be improved. While HRD conducts monthly HR council meetings where HR staff Citywide are informed of updates to hiring processes, attendance of these meetings is not tracked. IA additionally determined that training should be strengthened. Currently, there is no uniform training Citywide for HRLs (Human Resources Liaisons) or hiring managers to ensure compliance with Equal Employment Opportunity (EEO) laws.

Overall, IA found that to strengthen internal controls, the following recommendations should be incorporated: develop a central repository of all standards, restrictions, and laws that regulate the hiring process; update, expand, and document SOPs to reflect current operations; uniformize and enforce consistent maintenance of personnel files Citywide; ensure that department HRLs are trained to retain onboarding information in compliance with the retention policy; perform periodic audits of employee personnel files for accuracy and completion; ensure department HRLs are trained on the importance of maintaining physically secure personnel files; track attendance of monthly HR council meetings to ensure that HRLs are aware of changes; and implement a uniform Citywide training process for HRLs and hiring managers. Implementing these recommendations will ensure that proper internal controls have been established to ensure efficiency, effectiveness, and accountability over the hiring process.

I. Introduction

Background

HRD plays a vital role in the recruitment, selection, and hiring of qualified talent. HRD is responsible for managing hiring practices Citywide.

Departments are categorized as either Tier 1 departments (larger departments) or Tier 2 departments (smaller departments). Tier 1 departments are centralized and have their own HR functions that report directly to HRD. HRLs at Tier 2 departments report directly to intradepartmental management rather than HRD; however, the process of filling positions is handled at HRD in conjunction with assigned HRLs. At both Tier 1 and Tier 2 departments, all qualified applicants are referred to hiring managers, who are typically the direct supervisors of the position being filled. Hiring managers work closely with HRLs in the filling of a position.

The process for filling positions varies based on position classification. For American Federation of State, County, and Municipal Employees (AFSCME) positions, requisitions and exam requests are submitted for review; the position is then created, approved by the Civil Service Commission (CSC), and posted. Hiring managers then review applicants and refer them from the tested eligibility list for interviewing. For Cincinnati Organized and Dedicated Employee (CODE) positions, requisitions and exam requests are submitted for review; the position is then created, approved by CSC, and posted. If there are 15 or more qualified applicants, the CODE exam is administered, an eligibility list is generated, and hiring managers review applicants for interviewing. For unrepresented or unclassified positions, requisitions are submitted for review; the position is then created, sent to CSC, and posted. Finally, the hiring manager reviews all qualified applicants.

As part of the onboarding process, the applicant must complete a post-offer medical exam and drug screening through Employee Health Services (EHS), as well as a criminal background check. These records are verified by HRLs prior to the applicant's start date. The employee's I-9 form must be completed no later than their first day of employment to ensure their employment eligibility.[1]

HRD has oversight of the hiring process across departments through the NEOGOV software system. Management within HRD has the ability to review all information in NEOGOV for all departments. Additionally, HRD can access BoardDocs, a software system that houses all CSC meeting notices, agendas, and policies.

Physical copies of employee personnel files are maintained at the department level and governed by the Employee Personnel SOP, which stipulates which documents should be included in files, how medical records should be maintained, and how background checks should be evaluated and maintained.

[1] HR SOP Completing and Submitting an I-9 (2)

Audit Selection
IA conducted this audit in accordance with the Audit Work Plan.

Audit Objectives
The primary objectives of this audit were to evaluate the City's internal controls over the hiring process; and to determine whether HRD is effectively and efficiently conducting hiring practices in accordance with all applicable regulatory and legislative requirements.

Audit Scope and Methodology
To accomplish the audit objectives, Internal Audit ensured compliance with all relevant federal, state, and local regulations, reviewed pertinent policies and procedures, interviewed appropriate staff, and analyzed statistics of relevant data. Records reviewed included contracts, NeoGov data, applicant documentation for permanent hires, and other relevant information from FY24 to present.

Statement of Auditing Standards
As required by the Cincinnati Administrative Code Article II §15, this audit was conducted in accordance with the Generally Accepted Government Auditing Standards (GAGAS), except for standard 5.60 pertaining to external peer review requirements. This exception did not have a material effect on the audit.

IA continues to conduct internal quality reviews to assure conformance with applicable GAGAS. IA performed fieldwork between March and June of 2026.

Commendations
IA commends the staff of HRD for their cooperation throughout the audit.

II. Audit Findings and Recommendations

There is no central repository of all applicable regulations over the hiring process.

Having a central reference point for the hiring process is essential to provide consistency, compliance with relevant regulations and legal requirements, efficiency, and transparency, as HRLs can access uniform procedures and information silos can be prevented. Furthermore, having centralized documentation can be important for clarity and improving operational efficiency to ensure the department's ability to manage and maintain the hiring process.

IA requested documents from HRD and were provided with hiring maps for AFSCME and CODE, letters of agreement, CSC reports, and union contracts, as well as policies and procedures available to HR staff on the City website. However, there is no central repository that incorporates all of these documents.

Recommendation 1: Develop a central repository of all standards, restrictions, and laws that regulate the hiring process.

Department Response: Agree. While CityMatters contains numerous HR resources, including Citywide HR policies and procedures, Administrative Regulations, SOPs, job aids, and forms, HR agrees that a complementary platform would provide additional value by centralizing and improving access to hiring-related information. HR will expand and formalize a centralized hiring resource repository through "The Bridge" and related HR platforms to consolidate hiring maps and other hiring resources into a single accessible location for HR liaisons. This will be implemented in FY27. Responsible parties are HR Governance and Standardization Division and Shared Services.

<u>Policies and Procedures</u>

Hiring SOPs should be updated, expanded, and documented to reflect current operations.

For the hiring process to run efficiently and effectively, SOPs must be updated regularly to include changes and ensure uniformity Citywide. IA determined that although individual departments may create their own SOPs that are updated at the department's discretion, Citywide HR SOPs on the City's HR website have not been updated since 2014.

IA also determined that HRD policies should be expanded to include, at minimum, reference checking, reviewing applicants who were terminated from the City for cause, and interviewing and hiring panels for positions under the supervisor level. Expanding policies and procedures to include these operations can reduce the risk of hiring ineligible employees and ensuring compliance with relevant legal regulations.

Recommendation 2: Update, expand, and document SOPs to reflect current operations.

Department Response: Agree. HR agrees with the recommendation. HR is currently conducting a comprehensive review of hiring-related SOPs and job aides. Existing procedures will be updated to reflect current business processes and expanded to address areas including reference checking; interview panels, and related hiring practices. This will be implemented in FY27. Responsible Party is Workforce Management Division.

File maintenance throughout the City is inconsistent.

To ensure accuracy and completion of employee personnel files, it is critical that files maintained at the department level are uniform and consistent Citywide. IA determined that there is no consistency at the department level in terms of which documents are maintained in employee personnel files. For instance, some departments maintain employees' ok-to-hire emails from EHS, I-9s, and background checks in the personnel files, while others do not. Additionally, the onboarding material requested by IA during testing had to be pulled from several different sources such as paper files, emails, NeoGov, internal spreadsheets, and CSC records rather than being located in a centralized platform.

Recommendation 3: Uniformize and enforce consistent maintenance of personnel files Citywide.

Department Response: Agree. HR agrees with the recommendation. HR will update personnel file guidance, standardize records maintenance expectations, and provide departments with clear direction regarding required personnel file contents and recordkeeping practices. HR will incorporate these requirements into training and reference materials for departmental HR liaisons. This will be implemented in FY27. Responsible Parties are Office of the Director-Business Services and HR Governance and Standardization Division.

Essential documentation for employees could not be located.

Maintaining documentation for employees is critical to ensure the City's adherence to federal hiring laws, thus reducing the risk of hiring ineligible employees or individuals who cannot legally work in the United States. During testing of 59 new hires, IA was unable to locate essential documentation such as I-9s, tax withholding forms, ok-to-hire emails from EHS, and background checks for 18 (31%) hires (see table).

Missing Documentation	Number of Missing Documents
I-9s	12
Offer Letters	7
EHS Ok-to-Hire Emails	6
Background Checks	4
Tax Withholding Forms	4

Recommendation 4: Ensure that department HRLs are trained on the importance of maintaining essential personnel documentation to comply with federal regulations.

Department Response: Agree. HR agrees with the recommendation. HR will provide additional guidance and training to departmental HR liaisons regarding required personnel documentation, onboarding records, and record retention obligations pertinent to personnel files.

HR will also issue follow-up communications to departments identified during the audit and require departmental review of the personnel files in question. Departments will be required to determine whether documents are missing entirely, maintained in alternate City systems, retained by another records custodian, or otherwise documented. Any deficiencies identified will require corrective action and departmental certification of compliance. This will be implemented in FY27. Responsible parties are Office of the Director - Business Services and Department HR Liaisons.

Files for terminated employees were not retained at Cincinnati Recreation Commission (CRC) and Cincinnati Fire Department (CFD).

Retaining employee personnel files for terminated, retired, and promoted employees is essential to remain in compliance with HRD's records retention policy.[2] During testing of 59 personnel files, IA determined that 2 files for terminated employees, one at CRC and one at CFD, were not retained.

Recommendation 5: Ensure that department HRLs are trained to retain onboarding information in compliance with the retention policy.

Department Response: Agree. HR agrees with the recommendation. HR will provide updated training and guidance regarding personnel file retention requirements. In addition, HR will evaluate development of Citywide personnel and labor records retention guidance and pursue collaboration with the Records Commission regarding retention expectations applicable across departments.

In the interim, HR will update applicable guidance to reinforce that personnel files should be retained for no less than fifty years following separation unless otherwise governed by an approved retention schedule. This will be implemented in FY27. Responsible parties are Office of the Director- Business Services and HR Governance and Standardization Division

Cost-to-hire is not tracked by HRD.

Tracking hiring costs allows government HR departments to maximize taxpayer dollars, justify recruitment budgets to legislative bodies, and optimize staffing efficiency. By monitoring these expenses, the City can improve workforce planning and directly ensure that public funds are spent responsibly. IA confirmed that HRD does not track cost-to-hire.

Recommendation 6: Implement a Citywide policy to track cost-to-hire.

Department Response: Disagree. HR disagrees with the recommendation to implement a Citywide cost-to-hire policy. While cost-per-hire metrics may be beneficial in certain private-sector environments, HR's primary responsibility is ensuring timely, compliant, and effective staffing of critical public services. The City's hiring demands are driven by operational, and service-delivery needs rather than cost-per-hire metrics. Regardless of recruitment costs, departments must continue filling positions necessary to provide essential public services. Given current staffing levels and operational priorities, HR does not believe implementation of a cost-per-hire program would provide value proportionate to the resources required to develop, maintain, and report such metrics.

HRLs do not regularly update hiring data in NeoGov.

Updating NeoGov data to reflect applicant statuses such as whether an applicant has been selected for interviews is critical to ensure that HRD can properly track applicants' progress throughout the hiring process. IA was informed that it is the responsibility of HRLs to update applicant statuses and schedule interviews in NeoGov; however, as interviews are frequently

[2] Per HRD's Records Retention Schedules, personnel files must be retained until 50 years after termination.

set up via email or phone call, this does not always occur. As such, it is difficult for HRD to track the progress of individual hiring.

Recommendation 7: Implement a policy delineating interview scheduling and applicant status update procedures in NeoGov.

Department Response: Agree. HR agrees with the recommendation. HR will establish and communicate expectations regarding use of NeoGov for applicant status management and interview tracking. Updated procedures will be incorporated into training materials and communicated through HR Council and related guidance resources to improve consistency and enhance visibility into hiring activities. This will be implemented in FY27. Responsible party is Workforce Management Division.

Oversight

HRD has no oversight of department-level SOPs for hiring.

Proper management oversight of hiring SOPs is critical to ensure that the hiring process is consistent and organized across the City. IA was informed by HRD management that unless a department requests HRD's feedback on their department-level hiring SOPs, HRD has no involvement with SOP development. Without HR's insight into SOP development at the department level, there is an increased risk of improper hiring practices occurring.

Recommendation 8: Ensure that all department-level hiring SOPs are developed in coordination with and approved by HRD.

Department Response: Agree. HR agrees that hiring-related procedures should be standardized and aligned with Citywide hiring requirements. Any department-specific hiring procedures that supplement Citywide hiring policies should be reviewed by HR prior to implementation to ensure consistency with applicable policies, collective bargaining agreements, Civil Service Commission rules, and employment regulations.

However, HR does not currently possess approval authority over all departmental operating procedures and does not have sufficient staffing resources to perform formal review and approval of all departmental SOPs. HR will continue to provide consultation, technical assistance, and review of hiring-related procedures and will explore future governance opportunities in partnership with the City Manager's Office. Implementation date TBD. Responsible party is Workforce Management Division.

HRD does not perform periodic audits of employee personnel files at the department level.

Proper management oversight of employee personnel files is critical to ensure that all files are current, complete, and easily accessible for third-party review. IA determined that HRD does not check employee personnel files stored at the department level: although HRD receives copies of some documents through NeoGov such as classification specifications and tax withholding information, there is no additional verification that pertinent information is stored in the physical personnel files.

The lack of oversight of these files was especially apparent when IA reviewed 59 employee personnel files Citywide from FY24 to present to determine whether they were in compliance with the Employee Personnel File SOP[3]. IA determined that 32 files (54%) were missing essential documentation such as tax withholding information, classification specifications, and emergency contact forms. While IA was able to locate this information from other sources in 28 of the 32 files, maintaining all required documentation in each personnel file is crucial in ensuring consistency and reducing legal, financial, and operational risk to the City.

Recommendation 9: Perform periodic audits of employee personnel files for accuracy and completion.

Department Response: Partially Agree.HR agrees that employee personnel files should be periodically reviewed for accuracy and completeness. However, because personnel files are maintained and controlled at the departmental level, HR does not currently have staffing capacity to conduct routine Citywide audits of departmental personnel files.

Considering the audit's findings HR will consider the development of a biennial personnel file self-certification process requiring departments to review compliance with personnel file requirements and record retention guidance. HR may periodically request supporting documentation or conduct targeted spot reviews based upon identified risks, reported concerns, or compliance trends. This approach strengthens accountability while avoiding creation of a permanent unfunded audit function. This will be implemented in FY27. Responsible Parties are Business Services, HR Governance and Standardization Division, and Department HR Liaisons.

Personnel files at Greater Cincinnati Water Works (GCWW) were left unsecured.

Employee personnel files contain sensitive data such as Social Security numbers, tax forms, and performance reviews; as such, proper security measures such as keeping physical files in locked cabinets to prevent unauthorized access and identity theft is necessary. IA found that due to restructuring at GCWW, files were kept across several different rooms and left unsecured on employees' desks. This lapse in physical security increases risk for private employee information to be misappropriated.

Recommendation 10: Ensure department HRLs are trained on the importance of maintaining physically secure personnel files.

Department Response: Agree. HR agrees with the recommendation. HR will reinforce security requirements for personnel records through updated guidance, training materials, and ongoing communication with departmental HR liaisons. Departments will be reminded of their obligation to maintain personnel files in secure locations with access limited to authorized personnel. This will be implemented in FY27. Responsible Parties are Business Services, HR Governance and Standardization Division and Department HR Liaisons.

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[3] "At minimum, each employee's personnel file should contain: The original documents and not copies in the personnel file; Name, and employee identification number from CHRIS; Home and Mailing Address; Telephone Number; Emergency Notification information; Copies of all form 14's and/or documentation of personnel actions for the employee; Copy of the classification specification for the employee's job; Copies of corrective/disciplinary actions (To be removed in accordance with the applicable labor agreement); Copies of commendations; Copies of Performance reviews; Copies of tax withholding information; Any other information that relates to the employee's job performance; Photo of employee; Copies of any required license, registration, and/or certification renewals." HR SOP Employee Personnel Files (3)

Communication

Attendance of monthly HR council meetings is not tracked.

IA was informed that HRD conducts monthly HR council meetings, where HR staff Citywide are informed of updates to hiring processes. However, attendance of these meetings is not tracked. As such, HR staff who do not attend the monthly council meeting may miss important updates, which increases the risk of inconsistencies in the hiring process.

Recommendation 11: Track attendance of monthly HR council meetings to ensure that HRLs are aware of changes.

Department Response: Agree. HR agrees with the recommendation. HR could implement attendance tracking for monthly HR Council meetings and maintain records of attendance to assist in ensuring departmental awareness of significant hiring, personnel, and compliance updates. This will be implemented in FY27. Responsible Party is Business Services

Interdepartmental communication between EHS and HRLs can be improved.

Interdepartmental communication is essential for ensuring the smooth operation and continuous improvement of the hiring process. As EHS does not have access to NeoGov to aid in scheduling health exams and drug screens, appointments are scheduled via email between HRLs and EHS. The high volume of emails being exchanged may lead to ineffiencies in timely onboarding.

Recommendation 12: Implement a shared tracking mechanism between EHS and HRLs for appointment scheduling to streamline the onboarding process.

Department Response: Agree. HR agrees with the recommendation. HR and Employee Health Services will evaluate a standardized shared tracking mechanism to improve coordination, visibility, and communication regarding pre-employment medical examinations and related onboarding requirements. This will be implemented in FY27. Responsible parties are Employee Health Services, Workforce Management Division and Employee Services.

Training

Training for departmental HRLs and hiring managers is not sufficient and not uniform throughout the City.

Adequate training is critical to ensure that HRLs and hiring managers have sufficient knowledge of the hiring process and all relevant regulations. Without adequate training, there is an increased risk for illegal hiring practices to occur. IA determined that there is no uniform training Citywide for HRLs or hiring managers on the City's hiring processes, which increases the potential for liability to the City. Furthermore, hiring panels may not be aware of relevant regulations or trained to conduct EEO-compliant interviews.

Recommendation 13*:* Implement a uniform Citywide training program for HRLs and hiring managers.

Department Response: Agree. HR agrees with the recommendation. HR is working to develop and deploy a standardized training curriculum addressing hiring processes, EEO compliance, interviewing practices, documentation requirements, personnel records management, and related employment regulations for HR liaisons and hiring managers across the organization. This will be implemented in FY27-FY28. Responsible party is Workforce Management Division.

There is no standardized training on NeoGov and BoardDocs.

Standardized training on hiring software is essential to ensure that staff are fully utilizing these platforms' functionalities and that hiring processes remain consistent. IA was informed by HRD management that there is no standardized training on NeoGov and BoardDocs. Additionally, IA determined that features within NeoGov are not used consistently Citywide. For example, while Cincinnati Health Department (CHD) uses NeoGov for all candidate scheduling and communications, other departments communicate and schedule with candidates via City email.

Recommendation 14: Provide training on NeoGov and BoardDocs functionalities.

Department Response: Agree. HR agrees with the recommendation. HR will work to develop and provide standardized training resources regarding NeoGov and BoardDocs functionality, including applicant tracking, workflow management, interview scheduling, status updates, Civil Service processes, and document access. This will be implemented in FY27. Responsible party is Workforce Management Division.

III. Conclusion

HRD plays a vital role in the recruitment, selection, and hiring of qualified talent. The audit revealed several opportunities for strengthening internal controls over HRD operations.

Overall, IA found that to strengthen internal controls, the following recommendations should be incorporated: develop a central repository of all standards, restrictions, and laws that regulate the hiring process; update, expand, and document SOPs to reflect current operations; uniformize and enforce consistent maintenance of personnel files Citywide; ensure that department HRLs are trained to retain onboarding information in compliance with the retention policy; perform periodic audits of employee personnel files for accuracy and completion; ensure department HRLs are trained on the importance of maintaining physically secure personnel files; track attendance of monthly HR council meetings to ensure that HRLs are aware of changes; and implement a uniform Citywide training process for HRLs and hiring managers. Implementing these recommendations will ensure that proper internal controls have been established to ensure efficiency, effectiveness, and accountability over the hiring process.

IV. Human Resources Department Response

city of CINCINNATI
Interdepartment Correspondence Sheet

Date: August 10, 2026
To: Lauren Sundararajan, Internal Audit Manager
From: Latisha A. Hazell, Director, Department of Human Resources
Copies to: Kelly Carr, Deputy Director, Department of Human Resources

Subject: Human Resources Department Response to Draft Hiring Practices Audit Report

The Human Resources Department (HR) appreciates the time and effort devoted by Internal Audit in reviewing City hiring practices and identifying opportunities to strengthen consistency, documentation, training and communication, and oversight. HR concurs with most of the recommendations and has already initiated several efforts that support the objectives identified in the report, including development of The Bridge SharePoint Resource Center, ongoing review and modernization of HR standard operating procedures and job aids, and expansion of training resources for HR professionals across the organization.
HR's response reflects the shared responsibility for hiring and personnel administration across the City. While HR establishes Citywide standards, guidance, training, and oversight mechanisms, individual departments serve as custodians of departmental personnel files, hiring documentation, and departmental operational procedures and are responsible for maintaining compliance with applicable policies and recordkeeping requirements. Accordingly, several actions described below will require collaboration among HR, departmental leadership, HR liaisons, Employee Health Services, and the City Manager's Office.

Recommendation 1
Develop a central repository of all standards, restrictions, and laws that regulate the hiring process.

> **Department Response:** Agree.
> While CityMatters contains numerous HR resources, including Citywide HR policies and procedures, Administrative Regulations, SOPs, job aids, and forms, HR agrees that a complementary platform would provide additional value by centralizing and improving access to hiring-related information. HR will expand and formalize a centralized hiring resource repository through "The Bridge" and related HR platforms to consolidate hiring maps and other hiring resources into a single accessible location for HR liaisons.
>
> **Responsible Party:** HR Governance and Standardization Division and Shared Services
>
> **Completion Date:** FY27

Recommendation 2
Update, expand, and document SOPs to reflect current operations.

Department Response: Agree.
HR agrees with the recommendation. HR is currently conducting a comprehensive review of hiring-related SOPs and job aides. Existing procedures will be updated to reflect current business processes and expanded to address areas including reference checking; interview panels, and related hiring practices.

Responsible Party: Workforce Management Division

Assessment Completion Date: FY27

Recommendation 3
Uniformize and enforce consistent maintenance of personnel files Citywide.

Department Response: Agree**.**
HR agrees with the recommendation. HR will update personnel file guidance, standardize records maintenance expectations, and provide departments with clear direction regarding required personnel file contents and recordkeeping practices. HR will incorporate these requirements into training and reference materials for departmental HR liaisons.

Responsible Party: Office of the Director- Business Services and HR Governance and Standardization Division

Completion Date: FY27

Recommendation 4
Ensure department HRLs are trained on the importance of maintaining essential personnel documentation to comply with federal regulations.

Department Response: Agree.
HR agrees with the recommendation. HR will provide additional guidance and training to departmental HR liaisons regarding required personnel documentation, onboarding records, and record retention obligations pertinent to personnel files.
HR will also issue follow-up communications to departments identified during the audit and require departmental review of the personnel files in question. Departments will be required to determine whether documents are missing entirely, maintained in alternate City systems, retained by another records custodian, or otherwise documented. Any deficiencies identified will require corrective action and departmental certification of compliance.

Responsible Party: Office of the Director - Business Services and Department HR Liaisons

Completion Date: FY27

Recommendation 5
Ensure department HRLs are trained to retain onboarding information in compliance with HRP&P.

Department Response: Agree.

HR agrees with the recommendation. HR will provide updated training and guidance regarding personnel file retention requirements. In addition, HR will evaluate development of Citywide personnel and labor records retention guidance and pursue collaboration with the Records Commission regarding retention expectations applicable across departments.
In the interim, HR will update applicable guidance to reinforce that personnel files should be retained for no less than fifty years following separation unless otherwise governed by an approved retention schedule.

Responsible Party: Office of the Director- Business Services and HR Governance and Standardization Division

Completion Date: FY27

Recommendation 6
Implement a Citywide policy to track cost-to-hire.

Department Response: Disagree.
HR disagrees with the recommendation to implement a Citywide cost-to-hire policy. While cost-per-hire metrics may be beneficial in certain private-sector environments, HR's primary responsibility is ensuring timely, compliant, and effective staffing of critical public services. The City's hiring demands are driven by operational, and service-delivery needs rather than cost-per-hire metrics. Regardless of recruitment costs, departments must continue filling positions necessary to provide essential public services. Given current staffing levels and operational priorities, HR does not believe implementation of a cost-per-hire program would provide value proportionate to the resources required to develop, maintain, and report such metrics.

Responsible Party: Office of the Director

Completion Date: N/A

Recommendation 7
Implement a policy delineating interview scheduling and applicant status update procedures in NeoGov.

Department Response: Agree.
HR agrees with the recommendation. HR will establish and communicate expectations regarding use of NeoGov for applicant status management and interview tracking. Updated procedures will be incorporated into training materials and communicated through HR Council and related guidance resources to improve consistency and enhance visibility into hiring activities.

Responsible Party: Workforce Management Division

Completion Date: FY27

Recommendation 8
Ensure that all department-level hiring SOPs are developed in coordination with and approved by HR.

Department Response: Agree.
HR agrees that hiring-related procedures should be standardized and aligned with Citywide hiring requirements. Any department-specific hiring procedures that supplement Citywide hiring policies should be reviewed by HR prior to implementation to ensure consistency with applicable policies, collective bargaining agreements, Civil Service Commission rules, and employment regulations.
However, HR does not currently possess approval authority over all departmental operating procedures and does not have sufficient staffing resources to perform formal review and approval of all departmental SOPs. HR will continue to provide consultation, technical assistance, and review of hiring-related procedures and will explore future governance opportunities in partnership with the City Manager's Office.

Responsible Party: Workforce Management Division

Completion Date: TBD

Recommendation 9
Perform periodic audits of employee personnel files for accuracy and completion.

Department Response: Partially Agree.
HR agrees that employee personnel files should be periodically reviewed for accuracy and completeness. However, because personnel files are maintained and controlled at the departmental level, HR does not currently have staffing capacity to conduct routine Citywide audits of departmental personnel files.
Considering the audit's findings HR will consider the development of a biennial personnel file self-certification process requiring departments to review compliance with personnel file requirements and record retention guidance. HR may periodically request supporting documentation or conduct targeted spot reviews based upon identified risks, reported concerns, or compliance trends. This approach strengthens accountability while avoiding creation of a permanent unfunded audit function.

Responsible Party: Business Services, HR Governance and Standardization Division and Department HR Liaisons

Completion Date: FY27

Recommendation 10
Ensure department HRLs are trained in the importance of maintaining physically secure personnel files.

Department Response: Agree.
HR agrees with the recommendation. HR will reinforce security requirements for personnel records through updated guidance, training materials, and ongoing communication with departmental HR liaisons. Departments will be reminded of their obligation to maintain personnel files in secure locations with access limited to authorized personnel.

Responsible Party: Business Services, HR Governance and Standardization Division and Department HR Liaisons

Completion Date: FY27

Recommendation 11
Track attendance of monthly HR Council meetings.

Department Response: Agree.
HR agrees with the recommendation. HR could implement attendance tracking for monthly HR Council meetings and maintain records of attendance to assist in ensuring departmental awareness of significant hiring, personnel, and compliance updates.

Responsible Party: Business Services

Completion Date: FY27

Recommendation 12
Implement a shared tracking mechanism between EHS and HRLs for appointment scheduling.

Department Response: Agree.
HR agrees with the recommendation. HR and Employee Health Services will evaluate a standardized shared tracking mechanism to improve coordination, visibility, and communication regarding pre-employment medical examinations and related onboarding requirements.

Responsible Party: Employee Health Services, Workforce Management Division and Employee Services

Completion Date: FY27

Recommendation 13
Implement a uniform Citywide training program for HRLs and hiring managers.

Department Response: Agree.
HR agrees with the recommendation. HR is working to develop and deploy a standardized training curriculum addressing hiring processes, EEO compliance, interviewing practices, documentation requirements, personnel records management, and related employment regulations for HR liaisons and hiring managers across the organization.

Responsible Party: Workforce Management Division

Completion Date: FY27-FY28

Recommendation 14
Provide training on NeoGov and BoardDocs functionalities.

Department Response: Agree.
HR agrees with the recommendation. HR will work to develop and provide standardized training resources regarding NeoGov and BoardDocs functionality, including applicant tracking, workflow management, interview scheduling, status updates, Civil Service processes, and document access.

Responsible Party: Workforce Management Division

Completion Date: FY27

In Closing

HR is committed to continuous improvement and views this audit as an opportunity to further strengthen Citywide hiring and personnel administration practices. Through the implementation of the actions outlined above, HR will continue to advance consistency, accountability, and compliance while supporting departments in meeting their operational workforce needs. We appreciate Internal Audit's review and recommendations and look forward to continued collaboration in enhancing the City's human resources functions.

Attachments: Draft Hiring Practices Audit