

January 30, 2024

Internal Auditor Office  
1010 E Tenth Street  
Tucson, AZ 85719

Re: Management Responses and Commitments for 01/16/2024 Preliminary Audit Report

Dear Internal Auditor Smith:

Thank you for engaging with TUSD (Tucson Unified School District) Human Resources (HR) to conduct this year's performance audit. As you acknowledged in your report, HR has adopted a model of continuous improvement as evidenced by the systematic and thorough process we have established to address findings and recommendations of prior external and internal audits. The process we have established allows for the inclusion of all staff members in the improvement work of our department as they help to review our processes, provide input and recommendations, and participate in the implementation of those recommendations. This collaborative process has not only allowed us to address strategic improvements, while fulfilling our day-to-day responsibilities, but it also allows us to strengthen HR's productivity, effectiveness, teamwork, and employee morale.

In reviewing your audit findings, please know that we welcome your feedback as an additional opportunity to strengthen and further our continued progress. We recognize that your observations not only reflect areas for potential improvement but also acknowledge (1) the challenges HR faces as we try to build sufficient capacity to manage the high volume of work that comes through our offices, (2) the need for continued assessment and review of district systems and vendor services, and (3) the need to engage other departments in our improvement work when their support, guidance and partnership are needed. Nevertheless, we believe that we will be able to address your conditions and recommendations over the coming months.

Your report indicates that, at this time, "Internal Audit cannot provide the Governing Board with reasonable assurance that H.R. is performing in an efficient and effective manner." Over the past year since my appointment, HR has taken clear measures to improve efficiency and effectiveness, including but not limited to the following:

1. Updated HR mission and goals to align with district strategic goals.
2. Restructured office to strengthen capacity for data reporting and for project management of audit improvement work.
3. Structured collaborative processes for HR team members to help evaluate and implement prior audit recommendations.
4. Hired four additional employees to expand capacity for hiring, data reporting, and recruitment.
5. Gathered and reported monthly vacancy and time-to-hire data to set HR priorities and inform TUSD leadership of progress in hiring.
6. Established "triage" approach to address departments with "hard-to-fill" positions, including Transportation, Food Services, and Exceptional Education.
7. Required after-action reviews for all major initiatives and events (hiring season, job fairs, international hiring, etc.) to collect customer feedback and identify areas for improvement.
8. Began development of standard operating procedures outlining major HR activities and processes.
9. Increased visibility and site support by scheduling regular visits with site hiring managers, including new principals and office managers.
10. Created HR Master Calendar to prioritize HR work and to inform internal and external stakeholders regarding key deadlines.
11. Supported employee-led committee to plan and incorporate teambuilding activities during our monthly department meetings and to offer ongoing opportunities for collaboration and employee appreciation.

12. Surveyed hiring managers to identify communication disconnects in the hiring process and address areas for improvement.

In addition to outlining the progress described above, we are responding to the seven conditions (observations) noted in your Preliminary Audit Report. Our responses are provided below:

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**Condition 1: Hiring process redundancies and time constraints.**

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Human Resources recognizes some of the challenges that are presented when two systems do not communicate with each other (TalentEd-Applicant and Tracking/Visions-HRIS). The current HRIS provider has only recently offered an applicant tracking solution for our district to consider. HR will have to weigh the advantages and disadvantages of switching to a new platform after the contract for our current applicant tracking system expires in June 2025.

In the meantime, HR has documented the Hiring Process in a Standard Operating Procedure and is actively reviewing this area to further streamline and help drive down time-to-hire. This goal is aligned with the strategic work that our department is currently addressing because of a previous external audit (referred to as the EXMI Audit). Working groups have been reviewing time to hire by gathering data focused on the hiring process. The preliminary data indicated opportunities to clarify the hiring process and in making quicker hiring decisions, which we have begun to address by working closely with our hiring managers and making additional resources available for them. In addition, we've identified the largest variance in the hiring process occurs upon job offer accepted when the applicant is completing new hire requirements (9–26-day average), while time in HR remains consistent throughout the hiring process (6-9 days average peaking during our busiest time of year). With this information, we have developed different strategies and are implementing improvements for the current hiring season.

Since the last visit from the Internal Audit Office in November 2021, we were able to grow our team directly involved in the hiring process by hiring two (2) additional associates. This has allowed the workload to be redistributed across more individuals, positively impacting staff directly involved in the hiring process by alleviating some of the overtime that was regularly spent keeping up with the district's demand. Additionally, HR recently (November 2023) finalized a Level of Effort analysis and more evenly distributed the workload amongst associates. The method weighed different tasks based on time and complexity of tasks. Using this information, DACs (sites) were distributed to HR Associates and a paced training plan was implemented to ensure job knowledge is acquired and maintained by newer associates. This should address excessive overtime concerns and support our retention efforts in these positions.

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**Condition 2: Operational rights and access in the IVEE (aka iVisions) system.**

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Human Resources was not aware of HR staff's conflicting/incompatible permissions within the Visions system. We intend to review this information and work with Technology Services to clarify the process and procedures for granting, modifying, reviewing, and removing access. The current allocation has given staff the sufficient opportunity to fulfill their individual duties and responsibilities. While roles and permissions are reviewed, staff will be directed to continue exercising duties within their job roles.

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**Condition 3: Dual roles being performed by some HR staff members.**

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Human Resources recognizes the challenges of employees performing dual roles for any extended period. To help alleviate some of this burden, HR will prioritize the filling of vacancies that occur within our HR staff. Additionally, HR has already implemented a "buddy" system in the latest DAC (site) distribution when two or more HR Associates will share a region and cover each other. In an unexpected long-term vacancy, the DACs for that associate will be divided among the remaining associates until a replacement is hired. A similar approach will be evaluated for areas that do not currently have this available.

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**Condition 4: HR Associates are performing duties that should be segregated.**

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The role of HR Associate is primarily involved in the hiring process and in the processing of ePARs (Electronic Personnel Action Requests). Human Resources acknowledges the observation and recommendation to implement appropriate segregation of duties. Staff will conduct an internal review to assess our current operations and based on those results make the necessary changes. Careful consideration will be taken prior to a process change to ensure that any changes do not hinder the ability for us to reduce the time to hire.

**Condition 5: Minimal internal controls in the reviewed processes.**

Human Resources runs various self-audits throughout the year to review areas where mistakes can commonly occur. These include areas such as certifications, leased employee fields, educational stipends, salary schedules, supplemental positions, etc. These audits are run annually and on an as-needed basis. HR agrees that expanding internal controls in some areas could be beneficial for quality assurance throughout the hiring process. HR will address this by reviewing self-audit results to make strategic improvements moving forward.

**Condition 6: Record retention not in compliance with the Arizona State Library, Archives and Public Records.**

Human Resources acknowledges the discrepancy in the records disposal policy which exists between TUSD Governing Board Policy and AZ State Library, Archives, and Public Records. Currently, HR is practicing proper methods for disposing of personnel records. The discrepancy identified in this audit is related to differentiation in record retention for contracted and non-contracted employees. According to the latest retention schedule published by the state, HR is currently retaining non-contracted employee records for one (1) year longer than the retention schedule designates. Additionally, Governing Board Policy GBJ-R also leaves out the distinction between contracted and non-contracted personnel file retention. HR will work with Risk Management and Legal to update guidance on records retention to comply with state policy and create an HR Records Disposal Standard Operating Procedure in line with the updated guidance and in compliance with District and state policies.

**Condition 7: Several inconsistencies and/or errors within the information provided.**

Human Resources acknowledges the observation that sensitive information was shared through a secure SharePoint folder with our Internal Auditor. This is pertaining to SSN (Social Security Number) and DOB data included in raw applicant data requested. HR maintains confidentiality of sensitive, personal information in our daily activities. Confidential, personal information is not shared by Human Resources without the understanding that the parties (e.g. Internal Auditor) are entitled to the privileged information. We appreciate that the Internal Auditor is similarly bound by a professional and ethical requirement to keep sensitive data confidential.

HR appreciates the observation made regarding abbreviations used in various HR documents and will consider spelling out abbreviations that could be mistaken.

Regarding references and minimum screening “inconsistencies,” Human Resources and Internal Audit Office have discussed the opportunity to make language clearer. It remains correct that hiring managers (sites) will complete the references for recommended candidates, and Human Resources verifies the required references were completed. We acknowledge that the language stating “you will receive all application that meet minimum requirements” could be misinterpreted to mean that HR is conducting screening versus the referred applicants self-attesting meeting the minimum job requirements through screener questions assigned to each posting. HR will review published material to ensure that information is clear and up to date.

Thank you once again for your time and review of HR’s operations and performance. We are confident that you noticed our team’s progress over the past year, even as you identified further areas to work on. We look forward to continuing our improvements, and we welcome your support and input in that regard.

Sincerely,



Jon J.P. Fernandez  
Chief Human Capital Officer