UTSouthwestern Medical Center

Recruiting Audit

Internal Audit Report 20-07
July 1, 2020



Table of Contents

I.	Executive SummaryBackground/Scope and ObjectivesConclusion	3 3 4
II.	Detailed Observations and Action Plans Matrix	7
III.	 Appendices Appendix A – Risk Classifications and Definitions Appendix B – Open Requisitions Filled 	20 20 21



Background

The Talent Acquisition department provides recruitment and hiring services in support of the overall mission for delivering excellence in research, education and patient care. The function reports to the Assistant Vice President (AVP) of Talent Acquisition and Strategic Initiatives who reports to the Vice President and Chief Human Resources Officer. Talent Acquisition received over 15,659 applicants and hired 4,764 employees (Classified, Administrative and Professional (A&P) and Faculty) between September 2019 and March 2020.

The recruiting process begins with the departments submitting a position requisition through the PeopleSoft Human Capital Management (HCM) module with justification for the need and assessment of budgeted dollars available. Additionally, recruitment requests for hiring non-hospital staff positions requires submission through an in-house ADAPT system managed by the Academic and Administrative Information Resources Department (AAIR) reporting to the Vice President of Information Resources (IR). ADAPT is UT Southwestern's form generator used to create customized questionnaires and input forms for business, research and academic functions. This platform features support for paperless processes, automated email notifications, real-time reports, batch submissions, and the ability for users to upload supplemental documentation. This process ensures there is careful consideration whether the open positions merit hiring before posting. Once the position requests receive appropriate approval Talent Acquisition staff assists with the posting, screening of candidates, and coordinates recruitment activities with department hiring managers. For faculty positions, the Faculty Affairs Office provides strategic administrative functions such as coordination of position approvals, issuance of letters of intent, and maintaining appropriate documentation of all faculty members' employment records. Academic departments are responsible for faculty recruiting activities, which includes candidates sourcing, selection, interviews, offers and relevant documentation. Appendix B includes information on FY2020 requisition activity year to date.

The Talent Acquisition Management (TAM) system enables candidate tracking and management from the application through the hiring process. Two additional systems are in place to conduct background and reference checks before candidates under final consideration are officially hired. Recruiters coordinate reference checks through the SkillSurvey module in TAM. The Certiphi Screening system currently performs background checks; however, implementation of a new background check system is in progress that will better meet the strategic needs of the institution.

Scope and Objectives

The Office of Internal Audit has completed its Recruiting Audit. This was a risk based audit and part of the fiscal year 2020 Audit Plan. The audit scope period included activities from September 2019 to current. The audit focused primarily on hiring processes established for Administrative and Professional (A&P) Non-Executive, Faculty, and Classified employees.

The overall objective of the Recruiting Audit was to evaluate recruiting and hiring processes and the use of system tools to improve process flows and ensure efficient and effective processes for meeting institutional talent management needs.

We conducted our examination according to guidelines set forth by the *Institute of Internal Auditors' International Standards for the Professional Practice of Internal Auditing*.



Conclusion

Opportunities exist to strengthen processes and controls through additional system functionality enhancement and increased monitoring of recruitment activities. Increased system automation and capabilities will improve effective management oversight to ensure compliance with policies and procedures and consistent recruitment practices. A review is needed of TAM system security access with an evaluation of departmental power users. This type of departmental access reduces the involvement of recruiters in the screening process and increases the risk of inconsistency in recruitment, selection, record-keeping and non-compliance with institutional policies.

Talent Acquisition has initiated effort and resources to assist in identifying and enhancing the capabilities and functionalities of the recruitment system. However, a cost/benefit evaluation would be beneficial to assess the capabilities of the current recruiting system or explore other system alternatives to have a more robust system with controls and features to aid the function in meeting the strategic needs of the institution and ensure compliance with employment laws, regulations and policies. Talent Acquisition has, over the last year, enhanced various practices to improve the candidate recruitment experience and to attract a wider and more diverse talent pool. Most notably, the department engaged a vendor (Symphony) to create a new millennial job page and manage external networking sites, such as LinkedIn.

In addition, opportunity exists to improve recruitment and retention of certain veterans and their family members in accordance with Texas Government Code Chapter 657.

Furthermore, other opportunities include enhancing faculty recruitment monitoring processes and levels of service for identifying top candidates as well as providing refresher training to academic departments. This is to ensure that departments are consistently following faculty recruitment guidance and the strategic recruitment needs of the institution are met. The Faculty Affairs team has developed a comprehensive recruitment guide for academic departments to help ensure compliance with institutional recruitment and hiring requirements and relevant regulations.



The table below summarizes the observations in the detailed section of the report along with the respective disposition of these observations within the internal audit risk definition and classification process. See Appendix A for Risk Rating Classifications and Definitions.

Priority (0) High (3)	Medium (3)	Low (0)	Total (6)
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Key improvement opportunities are as follows:

- 1. Improve Enterprise-Wide Recruiting System Capabilities and Functionalities for Ensuring Effective and Efficient Hiring Processes The recruitment hiring process relies heavily on manual effort (e.g., non-systematic and/or non-automated driven processes) for the various recruiting tasks increasing the risk of noncompliance with policy requirements, human errors and process inefficiencies.
- 2. <u>Improve Monitoring Processes to Ensure Consistent Talent Acquisition Recruiting Practices</u> Monitoring controls need to be strengthened to ensure consistent practices and compliance with policies and legal requirements.
- 3. Reduce Departmental Power User Access and Increase Oversight of Recruiting Activities Occurring Outside of Talent Acquisition Hiring Managers in departments with power user access have the ability to review candidates and move them through the recruiting process with limited involvement and oversight by the Talent Acquisition department.
- 4. Improve User Access Management Functions and Streamline Access Roles in Talent Acquisition Management (TAM) System – Periodic system security access reviews are not performed to ensure users have appropriate system access to reduce the risk of unauthorized system access (i.e. terminated users or conflicting duties).
- 5. Enhance Coordination and Training for Recruiting and Hiring of Eligible Veterans for Staff and Faculty Positions in Compliance with Texas Government Code Chapter 657 The process for recruiting and retaining veterans, communication, training, and recordkeeping improvements are needed to ensure UT Southwestern is offering certain veteran employment preferences in accordance with state law.

Faculty Recruiting Observation:

• Strengthen Recruitment Monitoring, Service Levels and Refresher Training Opportunities for Academic Departments – The faculty recruiting monitoring processes need strengthening to ensure departments are complying with established policies and procedures and hiring best practices to reduce the risk of noncompliance with applicable legal and policy requirements.

Management has plans to address the issues identified in the report and, in some cases, corrective actions have already been implemented. These responses, along with additional details for the key improvement opportunities listed above, are included in the Detailed Observations and Action Plans Matrix (Matrix) section of this report.



We would like to take the opportunity to thank the departments and individuals included in this audit for the courtesies extended to us and for their cooperation during our review.

Sincerely,

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Resource





Observation	Recommendation	Management Response
 Systems controls are not configured to flag candidates whose offers are rescinded and/or who are not eligible for rehire. Unformatted job descriptions flow from PeopleSoft Human Capital Management (HCM) to Talent Acquisition Management (TAM), thus requiring manual reformatting by the recruiter. 	4. Evaluate implementing system controls for prescreening questions to ensure candidates answer all required questions and they are accurately recorded in system for automated screening of candidates who meet the minimum requirements.	We will also conduct a comprehensive review of the questions in the library to ensure they are valid, have all positions/prescreening questions reviewed by TA TAP/Lead prior to posting, train TA Managers on the use of the tool, and limit access to create/delete questions to TA Managers to protect the integrity of the questions.
		Action Plan Owners: 1-4. Assistant Vice President, Talent
		Acquisition & Strategic Initiatives
		Manager, Human Resources Information Systems
		Director PeopleSoft Human Capital Management System
		Target Completion Dates:
		a. Functionality near completion, rollout will be in conjunction with other initiatives by October 31, 2020
		b. Formal training will begin in July 31, 2020
		c. October 31, 2020



Observation	Recommendation		Management Response
		2.	Determine if TAM functionality exists to require evaluations and update TAM by Aug 1, 2020
		3.	Implement "Flag" functionality Sept 1, 2020 if functionality exists
		4.	a. Investigate TAM functionalities by July 31, 2020
			b. Review existing questions by October,31, 2020
			c. Have all prescreening questions reviewed before posting by September 30, 2020
			d. TA Guide training completion by July 31, 2020



Detailed Observations and Action Plans Matrix				
Observation	Recommendation	Management Response		
Risk Rating: High		Management Action Plans:		
 Improve Monitoring Processes to Ensure Consistent Talent Acquisition Recruiting Practices Monitoring controls need to be strengthened. Although there are procedures for Talent Acquisition Partners (TAP), there are inconsistent practices between individual TAPs for documenting, communicating and tracking key recruiting information and activities in TAM. When consistent practices are not maintained, enforced and monitored, key information may be missing, which increases compliance risk and hinders the institution's ability to meet its regulatory and legal obligations. The following are examples of inconsistencies identified in the system for candidates from December 30, 2019 to March 2, 2020: Applicant records did not reflect a disposition (e.g., did not meet minimum qualifications, candidate withdrew, more qualified candidate hired). Applicant records had incomplete interview information. This is primarily due to interviews being scheduled through Microsoft Outlook rather than through the TAM system. 	 Consider implementing monitoring processes that help to ensure sufficient information is recorded in TAM to support recruitment decisions and that decisions are consistently communicated by the Talent Acquisition Partners. To enhance the customer recruiting experience, consider identifying and documenting key dispositions (reasons for non-selection) and timelines for required communications to candidates throughout the phases of the recruiting process. Automate communications where possible. Additionally, ensure implementation of recommendations from the Office of Institutional Equity and Access regarding candidate dispositioning. Evaluate current training structure for new Talent Acquisition Partners to ensure emphasis is placed on consistent hiring practices. Also, consider continuous learning and development opportunities such as periodic refresher training for progressive education. 	 Related to above, we will consider requiring interview evaluations to support hiring decisions. We will implement monitoring processes. Regarding the dispositions, we will work to implement a new workflow for Hiring Managers to provide reasons on why or why not interviewed and/or hired/not hired and identify communication process including automation for communications to the candidates. The following action will be taken by management: Communication and Training to HM's to follow once the new HM disposition workflows are created and tested. The TA Guide is a comprehensive process guide for TAPs and TACs. We agree to review on a quarterly basis and provide corresponding training. Formal training of the revised guide will be conducted this summer. We will review the evaluation process for a subset of roles and determine if additional screening is necessary. 		



Observation	Recommendation	Management Response
 Applicants hired had background checks initiated directly through the third-party vendor instead of TAM. As a result, background check information was incomplete in TAM. Disposition was not consistently communicated to candidates who did not meet minimum qualifications or who were not selected for an interview for other reasons. Reference checks were not consistently initiated prior to extending a contingent offer of employment in accordance with EMP-151 Hiring, Promotion and Transfer Policy. 	4. Evaluate and update candidate reference request processes to include additional steps to be taken for key leadership or other certain roles in order to ensure effective and comprehensive assessment of candidates.	Action Plan Owners: 1-4. Assistant Vice President, Talent Acquisition & Strategic Initiatives Manager, Human Resources Information Systems Director PeopleSoft Human Capital Management System Target Completion Dates: 1. August 31, 2020 2. September 30, 2020 3. a. No later than October 31, 2020 b. Completed c. TA Guide training to be completed by July 31, 2020 4. July 31, 2020



Observation	Recommendation	Management Response
Risk Rating: High 3. Reduce Departmental Power User Access and Increase Oversight of All Recruiting Activities Occurring Outside of Talent Acquisition. Hiring Managers in departments have power user access, which allows them to move candidates forward in the recruiting process in TAM. Power user access had been granted to users across the institution who may not have adequate recruiting experience or training. This type of access reduces the involvement of recruiters in the screening process and increases the risk that candidates who do not meet minimum qualifications could advance through the hiring process. This practice also creates risk that the most qualified candidates may not receive proper consideration, noncompliance with policies and recordkeeping may not be adequate. The Application Process – External Candidates section of EMP-151 Hiring, Promotion, and Transfer policy confers the responsibility for processing and screening all applicants and forwarding applications of candidates who meet the required minimum qualification on the Talent Acquisition Partners.	 Conduct a comprehensive security review of all departmental power users' access and then evaluate business justification to retain power user access for the department. Limit access to users who have business need (i.e., departmental administrative managers, directors). Increase Talent Acquisition oversight of all departments retaining any power user access. Consider whether power users should continue to have the ability to initially screen candidates. Weigh the risk/benefit of continuing the practice or requiring initial screening by TAPs to ensure all candidates reviewed by the department meet minimum qualifications and process complies with EMP-151. Develop training for all department power users on expectations and requirements for certain TAM access privileges. Consider requiring attestation for compliance with the institutional recruiting policies and practices. 	 Management Action Plans: We will review and revise security roles to ensure proper access and functions, recognizing that access will need to be limited so that Talent Acquisition can manage the recruiting risks. We will consider having focus groups for faculty, Post Docs, graduate students, etc. to ensure we provide accurate functionality. Management will: Build out and test new security roles in TAM Assign appropriate roles and communicate to users Develop a comprehensive training including determining whether to require training for DPUs to have certain recruiting privileges such as screening. We will implement monitoring controls to ensure there are not any unauthorized Power Users. Action Plan Owners: Manager, Human Resources Information Systems Assistant Vice President, Talent Acquisition & Strategic Initiatives



Observation	Recommendation	Management Response
	Conduct ongoing monitoring to ensure appropriate removal of TAM access privileges for non-compliance.	Target Completion Dates: 1. Focus groups to be completed by July 31, 2020 2. a. September 31, 2020 b. October 31, 2020 3. December 31, 2020 4. March 31, 2021
Risk Rating: Medium		Management Action Plans:
 4. Improve User Access Management Functions and Streamline Access Roles in TAM Periodic system access review is not currently being performed to validate appropriateness of user roles and access, which may lead to unnecessary and unauthorized system access and potential segregation of duties conflict. Controls need to be strengthened to ensure appropriate system access. Analysis of TAM system access indicated the following: Two employees from a vendor who previously consulted with UT Southwestern had retained elevated access when it was no longer needed. 	 Immediately remove access rights retained by vendors who no longer need access to the information system. In addition, coordinate with the Information Resources group to evaluate the feasibility of reengineering roles that overlap to ensure that each user has only one role that aligns with their job responsibilities. Deactivate all terminated users who no longer have a business relationship with UT Southwestern. 	 We are removing vendor access rights and we will implement a quarterly review process of access once new roles are developed. We agree to deactivate terminated users. We will work with HRIS and IR to determine feasibility of an automated termination process. We agree to implement a procedure to periodically review system access in consultation with the Talent Acquisition team. We agree to perform a comprehensive review of all access right and remove redundant roles.



Observation	Recommendation	Management Response
314 terminated users retained access to the system including users with elevated access. Because of the single-sign on access, these terminated users could not access the system externally but access could be inappropriately used internally.	Integrate TAM with active directory to minimize reliance on manual deactivation of users and increase greater automated controls for ensuring terminated employees user access removals.	Action Plan Owners: 1. Manager, Human Resources Information Systems Assistant Vice President, Talent Acquisition & Strategic Initiatives
 Multiple users are granted power user access, which differs from system documented employee class who should have such access level. Two users have four roles (Hiring Manager, Recruiter, Recruiter Manager, and System Admin) while nine users have three roles (Hiring Manager, Recruiter, and Recruiter Manager or DPU, Hiring Manager, and Recruiter). 242 users have two roles (Others). Best practice and the institutional Systems Access Management policy require users to be granted access based on the principle of least privilege. Additionally, the policy requires designated information owners to remove users from any information system when their job responsibilities no longer require access to information system at the institution. This is to reduce the potential risk of unauthorized 	 removals. 4. Implement a procedure for periodic review of system access, and if feasible consider automating a process to deactivate users who no longer require access to the Talent Acquisition Management system. 5. Perform a comprehensive review of all access rights within TAM and remove redundant roles as appropriate. 	2, 4&5. Manager, Human Resources Information Systems 3. Director PeopleSoft Human Capital Management System Target Completion Dates: 1. Completed 2. Completed 3. August 31, 2020 4. Next review and update as of March 31, 2021 5. September 30, 2020
access, which may occur, from a malicious insider or potential compromise from outside the organization.		



Observation	Recommendation	Management Response
Risk Rating: Medium		Management Action Plans:
5. Enhance Coordination and Training for Recruiting and Hiring of Eligible Veterans for Staff and Faculty Positions in Compliance with Texas Government Code	Consider establishing a workgroup between Human Resources Talent Acquisition team, OIEA and the Faculty Affairs Office to coordinate and develop	We will initiate a work group comprising of OIEA, Talent Acquisition, and Veteran Recruiter to implement measures and reporting to achieve veteran recruitment goals.
Chapter 657 Process, communication, training, and recordkeeping improvements are needed to ensure UT Southwestern is offering certain	processes and steps towards accomplishing veteran recruitment goals and identifying procedures to be more compliant.	2. Consider moving the Veteran Recruiter to TA structure and have him lead veteran hiring efforts on behalf of TA, create a charter and outline roles, responsibilities and milestones.
veteran employment preferences in accordance with state law. Although there is a dedicated	Clarify roles, responsibilities and milestones towards accomplishing	2.1 Ensure TAM flags Veteran applicants.
recruiter and focused efforts on identifying and hiring veteran candidates, adequate processes are not in place for tracking UT Southwestern's efforts to ensure compliance with state law, which requires certain preferences to be given to qualified, eligible veterans and their family members.	 institutional goals and recommendations and document progress. Identify a method for ensuring candidates who are eligible for veteran's employment preference are flagged for screening by recruiters. 	 3. Coordinate with EDS to create report in EDW to report on requirements such as number of pre-identified veterans who were given preference and number of pre-identified veterans hired. 4. Communicate expectations and educate TAPs and Hiring Managers on how to identify
Opportunity exists to increase coordinated efforts between Talent Acquisition, the Office of Institutional Equity and Access (OIEA), the Faculty Affairs Office to recruit and retain veterans. Department Hiring Managers need additional training to more closely monitor processes and ensure data accuracy to support the quarterly reports filed with the State Comptroller's office.	 Develop tracking and reporting methods for on-going metrics monitoring to ensure reporting requirements are met. Conduct refresher training of TAP and Hiring Managers to enhance identification of eligible veterans and family members and ensure decision-makers understand how to apply 	eligible veterans and family members and ensure decision-makers understand how to apply preferences. 5. Under the direction of OIEA, communicate expectations and educate TAPs and Hiring Managers on how to identify eligible veterans and family members and ensure decision-makers understand how to apply preferences.
Inaccurate reporting, process deficiencies or lack of training increases reputational risks and noncompliance with state law.	preferences.	



Observation	Recommendation	Management Response
5.	5. Require Hiring Managers and Recruiters to verify that veteran's status is appropriately identified during the screening of applicants.	Action Plan Owners: 1. Assistant Vice President, Talent Acquisition & Strategic Initiatives Assistant Vice President, Office of Institutional Equity & Access 2-5. Assistant Vice President, Talent Acquisition & Strategic Initiatives Target Completion Dates: 1-2. July 31, 2020 3. August 31, 2020 4. August 31, 2020 5. September 31, 2020



Observation	Recommendation	Management Response

Faculty Recruiting Observations



Observation	Recommendation	Management Response
Risk Rating: Medium •		Management Action Plans:
 6. Strengthen Recruitment Monitoring, Service Levels and Refresher Training Opportunities for Academic Departments The faculty recruiting monitoring process needs strengthening to ensure that departments will consistently source, screen, select and interview candidates in accordance with standard practices to mitigate the risk of noncompliance with relevant regulatory and policy requirements or perception of unfair recruitment practices. A review of six sampled academic department recruitment processes including an analysis of system records indicated the following: • 70% of interviews from a sample test of 50 candidates in the months of September 1, 2019 to March 1, 2020, have evaluations documented in the system. All interviews conducted on faculty candidates, which have evaluation requirements need documentation in TAM. • A viable process or program to attract candidates for specialized positions, specifically in faculty research positions, may be lacking. • A significant amount of time and effort goes into the faculty recruiting process in terms of obtaining approval signatures for hard copy documents. 	 Identify users who have access to submit interview evaluations. Then implement a monitoring procedure to track completion of interview evaluations for faculty hires. If feasible, require inclusion of evaluation summary in the faculty member's file. Consider implementing a digital method for signature approvals to help reduce the time and effort taken to send documents around for sign offs. Faculty Affairs Office should ensure periodic refresher training for the academic departments to help them stay current on the hiring practices and regulations. In addition, implement a form of attestation to help track training and ensure accountability. Furthermore, Human Resources should provide refresher training for Faculty Administration to help their knowledge and use of the recruiting system. Consider extracting Appendix E of the Faculty Recruitment Process manual and include in the main section for departments to locate key processes for pertaining to recruitment activities. 	 We agree with the recommendation of identifying current users and their level of access. This data would need to be provided by the business owner (e.g., Human Resources) to Faculty Affairs. Faculty Affairs currently has a monitoring procedure in place that is documented, based on data our team can see in TAM, therefore based upon data provided by HRIS, and sufficient training, if needed, we could implement the monitoring of this activity. Due to the lack of functionality in TAM, however, a comprehensive interview/evaluation summary to be included in the faculty member's file is not available. Due to the immediate onset of COVID 19, we were able to immediately revise our current processes, announce to Departments/Centers and implement. Process is efficient and working well. Would recommend continuing post COVID 19. The Faculty Affairs team currently trains al new hires in Departments/Centers who are responsible for the faculty recruitment process. Additionally, we already have a yearly attestation for Department/Center Administrators. We concur with the recommendation of receiving refresher training by Human Resources as needed.



Observation Observation	Recommendation	Management Response
Refresher training opportunities may exist to help ensure academic departments have the most up-to-date knowledge of recruiting practices and effective use of the recruitment system.		4. We have extracted the faculty recruitment in TAM appendix section and included in the main section of the Standard Operating Procedures manual to make it easier for departments to locate when needed.
Expanding the Talent Acquisition resources to the academic departments is important to improve faculty recruiting efforts across the institution.		Action Plan Owners:
		1 2. Manager, Human Resources Information Systems
		Assistant Vice President, Talent Acquisition & Strategic Initiatives
		Associate Director, Faculty Affairs
		Associate Director, Faculty Affairs
		4. Associate Director, Faculty Affairs
		Target Completion Dates:
		Get Data from HR By December 1, 2020. Put Procedure in place by January 31, 2021
		2. Completed
		3. Completed
		4. Completed



Appendix A – Risk Classifications and Definitions

As you review each observation within the Detailed Observations and Action Plans Matrix of this report, please note that we have included a color-coded depiction as to the perceived degree of risk represented by each of the observations identified during our review. The following chart is intended to provide information with respect to the applicable definitions and terms utilized as part of our risk ranking process:

	Degree of R	of Risk and Priority of Action	
Risk Definition- The degree of risk that exists based upon the identified deficiency combined with the subsequent priority of action to be undertaken by management.	Priority	An issue identified by Internal Audit that, if not addressed immediately, has a high probability to directly impact achievement of a strategic or important operational objective of a UT institution or the UT System as a whole.	
	High	A finding identified by Internal Audit that is considered to have a high probability of adverse effects to the UT institution either as a whole or to a significant college/school/unit level. As such, immediate action is required by management in order to address the noted concern and reduce risks to the organization.	
	Medium	A finding identified by Internal Audit that is considered to have a medium probability of adverse effects to the UT institution either as a whole or to a college/school/unit level. As such, action is needed by management in order to address the noted concern and reduce the risk to a more desirable level.	
	Low	A finding identified by Internal Audit that is considered to have minimal probability of adverse effects to the UT institution either as a whole or to a college/school/unit level. As such, action should be taken by management to address the noted concern and reduce risks to the organization.	

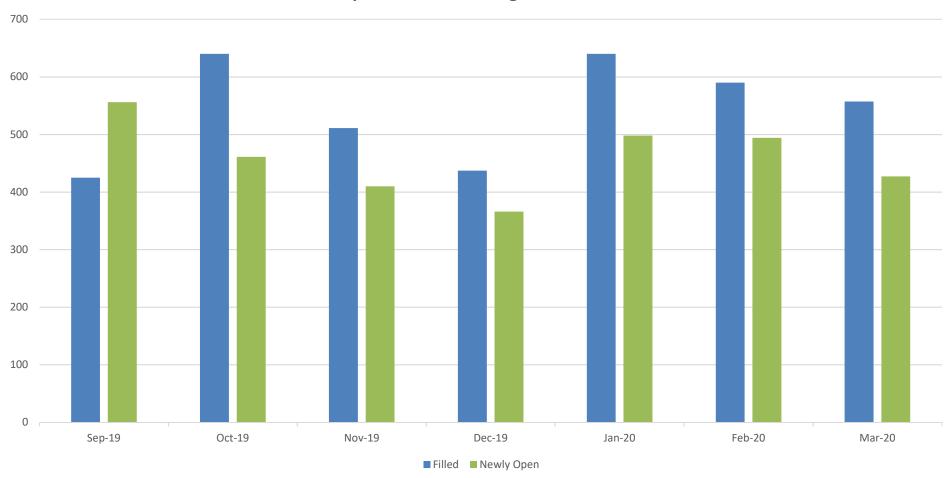
It is important to note that considerable professional judgment is required in determining the overall ratings presented on the subsequent pages of this report. Accordingly, others could evaluate the results differently and draw different conclusions. It is also important to note that this report provides management with information about the condition of risks and internal controls at one point in time. Future changes in environmental factors and actions by personnel may significantly and adversely impact these risks and controls in ways that this report did not and cannot anticipate.



Appendix B – Open Requisitions Filled Per Month

The column chart below shows the number of open requisitions filled per month from September 2019 through March 2020.

Open Requisitions Filled Per Month September 2019 through March 2020





Appendix B – Open Requisitions Filled Per Month

The following graph shows the open requisitions filled per job family from September 2019 through March 2020.

Open Requisitions Filled Per Job Family September 2019 through March 2020

