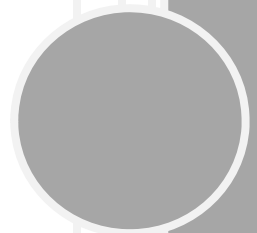# AUDIT REPORT

DALLAS COUNTY
FY2021 - Human Resources Follow-Up

Darryl D. Thomas
Dallas County Auditor
ISSUED: 8/17/2021
RELEASED: SEPTEMBER 7, 2021

FY2021 - Human Resources Follow-Up

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This report is intended for the information and use of the agency/department. While we have reviewed internal controls and financial reports, this review will not necessarily disclose all matters of a material weakness. It is the responsibility of the department to establish and maintain effective internal control over compliance with the requirements of laws, regulations, and contracts applicable to the department

DALLAS COUNTY
COUNTY AUDITOR

MANAGEMENT LETTER

Mr. Robert Wilson
Human Resource Director
Dallas, Texas

Attached is the County Auditor's final report entitled "FY2021 - Human Resources Follow-Up" Report. In order to reduce paper usage, a hard copy will not be sent through in house mail except to the auditee.

In you prefer that released reports be emailed to a different (or additional) recipient, please inform me of the name and the change will be made.

Respectfully,

Darryl D. Thomas

Darryl D. Thomas
County Auditor

EXECUTIVE SUMMARY

The Dallas County Human Resources Department actively assists employees and their supervisors with personnel procedures, job performance issues, employee rights, workplace problems and resolutions. Human Resources offers monthly employee training on work-related topics such as goal-setting, time-management and policies and best practices related to the supervision of employees. In addition to performing background checks and salary analyses on all newly hired employees, the department also has the task of recommending modifications to the total compensation package offered to employees and applicants. A follow-up review of a prior audit finding related to the Taleo Recruitment system revealed the significant observations below:

Summary of Significant Observations

- Taleo did not mask applicant Social Security numbers from users with the configuration profile Hiring Manager.

Repeat Observations from Previous Audits:

- This observation is repeated from the report issued February 12, 2020.

Only those weaknesses which have come to our attention as a result of the audit have been reported. It is the responsibility of the department management to establish and maintain effective internal control over compliance with the requirement of laws, regulations, and contracts applicable to the department.

INTRODUCTION

Dallas County Auditor's Office mission is to provide responsible, progressive leadership by accomplishing the following:

- Comply with applicable laws and regulations
- Safeguard and monitor the assets of the County utilizing sound fiscal policies
- Assess risk and establish and administer adequate internal controls
- Accurately record and report financial transactions of the County
- Ensure accurate and timely processing of amounts due to County employees and vendors
- Set an example of honesty, fairness and professionalism for Dallas County government
- Provide services with integrity
- Work in partnership with all departments to resolve all issues of the County
- Strive to utilize the latest efficient and effective technology in the performance of tasks
- Provide technical support and training in the development, implementation, and maintenance of information systems
- Hold ourselves accountable to the citizens of the County at all times
- Be responsive to the elected officials and department heads of Dallas County

DALLAS COUNTY

COUNTY AUDITOR

DETAILS

Visibility of Applicant Social Security Numbers

A follow-up review of a significant finding related to the utilization of the Taleo Talent Management System initially reported February 12, 2020 revealed that the personally-identifiable information (PII), particularly social security numbers, of applicants for Dallas County vacant positions remains visible to employees with the "Hiring Manager" system configuration. A review of all applicants on one employment requisition revealed that the full social security numbers of five out of seven or 71% of applicants were visible to employees with the "Hiring Manager" system configuration. All applicants were internal candidates. Notably, the two applicants without visible social security numbers have initial hire dates that pre-date the implementation of Taleo and the most recent Oracle upgrade and the visibility of social security number appears to be isolated to newer first-time applicants.

Per the Department of Labor, Guidance on Personally-Identifiable Information Personal Identifiable Information (PII) is defined as any representation of information that permits the identity of an individual to whom the information applies to be reasonably inferred by either direct or indirect means. Further, PII is defined as information: (i) that directly identifies an individual (e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc.) or (ii) by which an agency intends to identify specific individuals in conjunction with other data elements, i.e., indirect identification. (These data elements may include a combination of gender, race, birth date, geographic indicator, and other descriptors). Additionally, information permitting the physical or online contacting of a specific individual is the same as personally identifiable information. This information can be maintained in either paper, electronic or other media. Access to personally-identifiable information should be restricted to those with a bonafide business responsibility related to the data.

Limited system roles and configurations and inconsistent management follow up on previously identified finding related to the visibility of personally-identifiable information has increased the potential liability to Dallas County for the misuse or fraudulent activity related to the exposure of PII, specifically the exposure of applicants' full social security numbers to employees without a bonafide business responsibility related to the data.

Recommendation
Visibility of Applicant Social Security Numbers

Management should address the visibility of full social security numbers by those with the Hiring Manager configuration by requesting system configurations that restrict the full visibility of social security numbers to those with a bonafide business responsibility related to the data.

Management Action Plan

We have tested in the test instance as well as in production and have restricted the SSN's and they are no longer visible in the applicant profiles.

Auditors Response
None

cc: Darryl Martin, Commissioners Court Administrator

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