



Control Cycle Audit of Human Resources Hiring Process 2024-25 CYCLE

GENEVA CITY SCHOOL DISTRICT FOR FISCAL YEAR JULY 1, 2024 – MARCH 31, 2025

**Geneva City School District
400 West North Street
Geneva, NY 14456**

July 7, 2025



To the Audit Committee
Geneva City School District
Geneva, New York

We have performed a review of the internal controls over processes related to the District’s Human Resources Hiring Process. We obtained an understanding of these internal controls by inquiry, observation and the inspection of documents and records. Our review of the Hiring Process included examining the processes and practices utilized by Human Resources when hiring new employees. We selected a sample of employees who were new hires during the audit scope period to determine whether key functions operated as intended and were completed accurately. Key functions that were examined included components of the application process, interview process, and onboarding process for both instructional staff and support staff.

For purposes of this report, internal control is a process affected by the Board of Education (the “Board”), department heads and other personnel, designed to provide reasonable assurance regarding the achievement of objectives in the reliability of financial reporting and safeguarding of assets.

As noted, the purpose of our engagement was to assist you in improving the internal controls and reducing the risks that face your District involving the processes related to the Hiring Process and the related procedures and internal controls. However, it is ultimately your responsibility to assess the adequacy of your risk management system. In performing our engagement, we relied on the accuracy and reliability of information provided by District personnel. We have not audited, examined or reviewed the information in the context of a financial audit, and express no assurance thereon.

The accompanying comments and recommendations are intended solely for the information and use of the Audit Committee, Board of Education, department heads and others within the District and should not be used for any other purpose.

We appreciate the opportunity to serve the District and thank the individuals involved for their cooperation.

A handwritten signature in black ink that reads 'EFPR Advisory, LLC'.

EFPR Advisory LLC
Rochester, New York

BACKGROUND:

The Geneva City School District (District) is located in Ontario County and has a total enrollment of approximately 2,100 students. The District's Human Resources Department is primarily responsible for processing personnel changes related to new hires. Human Resources maintains the personnel records for all District employees. These records include supporting documentation that demonstrates that various critical elements of the hiring process were completed. These include elements related to the application process, interview process, and onboarding process. While some of these elements vary slightly depending on whether the position is for instructional staff or support staff, there are certain requirements that are critical for all positions. Namely, all new employees should undergo a fingerprint background clearance and complete an I-9 employment verification form.

OBJECTIVE:

The objective of this audit was to evaluate the internal controls over the processes related to New Hires and Terminations at the Geneva City School District. This audit is intended to satisfy the internal control audit requirement for the 2024-25 cycle.

AUDIT SCOPE, PROCEDURES AND FINDINGS:

Our overall goal was to assess the adequacy of the internal controls put in place by officials to safeguard the assets of the Geneva City School District. To accomplish this, we reviewed the District's updated risk assessment. This risk assessment evaluated all functional areas of the District, including Budgeting; Cash Receipts and Revenue; Transportation; Food Service; Extra Classroom Activity Fund; Capital Assets/Projects and Indebtedness; Purchasing, Claims, Accounts Payable and Cash Disbursements; Payroll and Personnel; and Accounting, Reporting and Information Technology.

Using the updated risk assessment from 2024-25 and other criteria, the Audit Committee of the District selected to review New Hires and Terminations. As a result, our testing was limited to this area.

In performing our review of the hiring process, we started by reviewing relevant District policies and procedures, interviewing key staff, and examining relevant reporting and supporting documentation.

AUDIT SCOPE, PROCEDURES AND FINDINGS (Continued):

Hiring Process

- Reviewed the procedures followed by the Human Resources department for the process of hiring new employees.
- Identified the procedures that are considered critical/necessary in the hiring process in order to perform testing for a sample of new hires.
- Performed testing for a sample of 27 new hires to determine whether the hiring process is functioning as intended and that there is evidence that the critical/necessary steps have been completed.
- Testing related to instructional staff included elements of the application process (i.e. application, resume, certification/license, letters of reference, transcripts), interviewing process (i.e. reference checks, interview packet/results), and the onboarding process (i.e. fingerprint background clearance, completion of I-9).
- The process for filling vacant support staff positions is generally dictated by Civil Service requirements. Testing reviewed for a valid application, reference checks, and onboarding requirements (i.e. fingerprint background clearance, completion of I-9).

FINDING:

The controls over the District's processes related to new hires are operating effectively with the following exceptions noted:

1. During our testing of personnel files associated with new hires for support staff positions, we noted nine exceptions for which it appears that the I-9 employment verification form was not completed properly. In seven instances, the District did not obtain the required documentation for the verification to be valid. Only one form of identification was obtained (driver's license). When an employee's driver's license is used for verification purposes, the I-9 instructions require a second form of identification to also be documented (i.e. social security card) in order for the verification to be valid.

The two remaining exceptions were due to the District not properly completing/signing the employer section of the form.

In all cases the exceptions were related to support staff positions. All testing related to I-9 forms for instructional new hires determined that the I-9 form was properly completed.

AUDIT SCOPE, PROCEDURES AND FINDINGS (Continued):

RECOMMENDATION:

We encourage Human Resources to provide updated training/instructions to Human Resources employees on the proper completion of I-9 forms in order to ensure the District is compliant with Department of Labor requirements. Also, we suggest that the District review all I-9 forms for support staff positions that have been filled during the 2024-25 school year to identify other potential exceptions so that corrective action can be taken, as necessary.

COMMENTS:

The above finding referenced exceptions related to requirements that the District is mandated by New York State or the federal government to complete (i.e. fingerprint background clearance, I-9 employment verification). Our testing also identified instances in which the documentation appeared to deviate from the District's standard hiring processes and practices. Although these do not represent findings of regulatory noncompliance, we offer the following results of deviations from the standard practices and/or expectations to District management for their consideration.

- We learned that the District's standard hiring practice related to instructional staff is to obtain from the applicant three letters of reference. The results of our testing of 14 instructional staff new hires identified two instances in which this was not satisfied.
- We learned that the District's standard hiring practice related to instructional staff is to document that two reference checks have been completed. The results of our testing of 14 instructional staff new hires identified three instances in which this was not satisfied. In two cases, one reference check was documented. For the third case, no reference checks were documented but we were informed that the applicant was known to members of the District's senior management team.

CLOSING REMARKS:

We would like to thank District staff for their assistance and cooperation throughout the course of our review of the District's procedures and internal controls related to new hires and terminations.