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April 29, 2025

County of Ventura Board of Supervisors

Subject: Receive and File a Follow-up Report on Actions to Address Recommendations Resulting from a Review of Current Human Resources Policies and Complaint Investigation Procedures Conducted by FordHarrison, LLP.

Recommendation

It is recommended that your Board receive and file a follow-up report on Actions to Address Recommendations Resulting from a Review of Current Human Resources Policies and Complaint Investigation Procedures (HR Audit) Conducted by FordHarrison, LLP (FordHarrison).

Fiscal Impact

There is no fiscal impact associated with this item.

Background and Discussion

On March 22, 2022, your Board authorized the Auditor-Controller to contract with an independent consultant to review eight (8) of the County's human resources policies and procedures related to the complaint resolution process. The Auditor-Controller retained FordHarrison to conduct the audit. The Auditor-Controller presented the consultant's final audit report, inclusive of responses submitted by the County Executive Office-Human Resources (CEO-HR), to your Board on March 28, 2023. At that time, CEO-HR committed to hiring a third-party law firm specializing in California public sector human resources to assist in implementing some of the recommendations.

CEO-HR retained the law firm of Hanson Bridgett LLP (Hanson Bridgett) to revise the employment policies, develop standard operating procedures for the County's complaint investigation process, and to review, evaluate, and develop in-person training for County human resources professionals on complaint investigation processes and training of managers and executive staff on key employment policies. CEO-HR reported the status of those corrective actions to your Board on March 26, 2024.

Today's presentation is to provide a second and final status update on the corrective actions taken by CEO-HR that are responsive to the FordHarrison report.

1. Human Resources Policies

Seven (7) County policies were revised to align with industry best practices and to incorporate legislative updates. CEO-HR worked in close collaboration with County Counsel to review the recommended revisions and amend the policies to be responsive to FordHarrison's recommendations.

The seven amended policies listed below have been updated in the County's Administrative Manual. Digital copies of the amended policies were disseminated to County employees through the County's learning management system as a required assignment that each policy be reviewed and acknowledged. As of November 2024, 8,870 (or 89.5%) of the County's 9,911 employees had completed the policy review and acknowledgement assignment. The amended policies are also distributed to all County employees during the completion of the County's mandatory sexual harassment training that is required every two years.

- Chapter 1-3 Code of Ethics
- Chapter IV(B)-3 Workplace Violence Policy
- Chapter VIII(A)-2 Equal Employment Opportunity Plan
- Chapter VIII(A)-3 Sexual Harassment Policy
- Chapter VIII(A)-15 Whistleblower Policy
- Chapter VIII(A)-19 Respectful Workplace Policy
- Chapter VIII(A)-23 Harassment, Discrimination, and Retaliation Prevention Policy

In addition to the seven (7) policies listed above, FordHarrison reviewed Policy No. 14 – Social Media, an Information Technology policy that is not an employment policy nor is it included in the County's Administrative Manual. Many of the external auditor's recommendations concerning the Social Media policy were already addressed in the County's Technology Use policies. Therefore, no correction action was deemed necessary.

2. Complaint Investigation Procedures

Hanson Bridgett developed standard operating procedures (SOPs) for the County's internal complaint investigations, including recommended timelines, model report format templates for advising complainants and respondents of the investigation results, and an assessment of the necessity of sub-agency-specific procedures and policies, including recommendations for how to update guidance to clarify appropriate mechanisms for reporting various types of complaints. The SOPs were deployed county-wide to all staff who conduct administrative investigations. Hanson Bridgett conducted customized

trainings for County investigators on the administrative investigation SOPs as discussed in the Training Programs Section 3 below.

In October 2024, Hanson Bridgett conducted the first annual review of a sampling of administrative investigations conducted by County investigators from May through September 2024 to ensure objective and properly documented assessments. These reviews were not intended to revisit the determinations made, but rather to determine whether the investigations met legal and professional standards and other requirements for objective and thorough investigations.

Hanson Bridgett representatives met with CEO-HR staff on November 19, 2024, to present the results of the review and recommendations for enhanced efficiencies. The overall assessment was that the investigations demonstrated a strong grasp of evidentiary standards, utilized sufficient evidence in reaching conclusions, and that the reports were in proper format and order resulting in ease of comprehension. Hanson Bridgett identified witness credibility assessments and policy analysis as areas of improvement. Accordingly, Hanson Bridgett recommended additional staff training as discussed below.

CEO-HR implemented semiannual reporting on workplace complaint resolution activity to your Board in 2023. The most recent report was presented on March 11, 2025, for the period of July through December 2024. The next report will be scheduled in August 2025 to cover the period from January through June 2025.

3. Training Programs

Hanson Bridgett developed and delivered two comprehensive all day in-person training programs related to the County's complaint investigation procedures that covered the new SOPs, including planning, interviewing, law (both federal and California), evidence, credibility, ethics, bias, development of appropriate conclusions, and report writing. This training was mandatory for all County human resources personnel (approximately 60 individuals) who conduct or participate in administrative investigations.

The Hanson Bridgett all-day in-person sessions were held on the following dates:

- Thursday, April 25, 2024; and
- Wednesday, May 15, 2024

Based on the review of a sampling of administrative investigations conducted by County investigators, Hanson Bridgett then developed and delivered two additional half-day in-person training programs related to Credibility and Policy Analysis. The additional training covered the topics of identifying the scope of investigation, witness interview considerations, best practices for credibility assessments, and best practices for developing investigation findings. This training was mandatory for all County human

resources personnel (approximately 60 individuals) who conduct or participate in administrative investigations.

The Hanson Bridgett half-day in-person sessions were held:

- Monday, March 10, 2025; and
- Thursday, March 27, 2025

Hanson Bridgett also developed and delivered 23 half-day, in-person training sessions entitled *Policy Updates and Legal Responsibilities for Supervisors* related to key employment policies for County supervisors, managers, executives, and elected officials. The 23 training sessions occurred from July 18 through November 7, 2024. Approximately 1,544 County supervisors, managers, executives and elected officials completed the training. The training is now available through the County's on-demand online learning management platform, Cornerstone, for current or new managers who did not attend the in-person training.

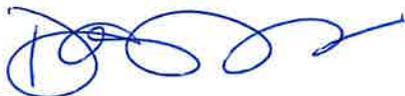
In summary, the corrective action plan has been responsive to the 61 individual recommendations made by FordHarrison. CEO-HR continues to work on an ongoing basis to build on the professionalism and solid procedures already in place.

Strategic Plan

The recommended items support the County's Strategic Priority to attract, hire, develop, and retain a diverse workforce empowered to meet the needs of our customers.

The County Executive Office, County Counsel, and the Auditor-Controller's Office have reviewed this letter. If you have questions, please contact me at (805) 654-2561.

Respectfully submitted,



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