



# Family and Medical Leave (FMLA/OFLA)

March 8, 2023

**A Report to the  
Jackson County  
Board of Commissioners**

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**To: Board of Commissioners**  
**Re: Audit of**  
**Date: March 8, 2023**

The enclosed report presents the results of an audit over the County's FMLA/OFLA procedures and compliance of those procedures in preparation of the new Paid Leave Oregon Law.

We found that the County processes leaves in accordance with FMLA/OFLA requirements but there is a risk of non-compliance because not everyone is trained; there is not a uniform understanding of when process needs to be initiated; and record keeping varies from department to department.

Please feel free to contact me at your convenience if you have any questions or would like additional information not contained in the report.

**C:** Karen Ramorino, Human Resources Director  
Audit Committee  
Jackson County Budget Committee  
Moss Adams, LLP

## IN A NUTSHELL

### Audit Objectives

The objectives of the audit were:

1. To evaluate whether current practices provide adequate assurance that County departments are adhering to prescribed practices relating to FMLA / OFLA  
and
2. To identify areas where Human Resources (HR) should take action to ensure future compliance with FMLA / OFLA and in preparation for Oregon's new Paid Leave law.

### What We Found

In general, the County processes leaves in accordance with FMLA / OFLA requirements but there is a risk of non-compliance because:

1. Not everyone who needs to know at least some part of the FMLA / OFLA process is trained;
2. There is not a uniform understanding of when the leave process needs to be triggered; and
3. Record keeping practices vary from department to department.

### What We Recommend

1. A "responsibility focused" training program is developed and implemented to ensure department HR administrators and new managers/supervisors are trained on FMLA/OFLA.
2. HR and County Counsel review, and as-needed update, existing guidance to help departments distinguish between a serious health condition and a not serious health condition.
3. HR reevaluate the need for mailing the FMLA/OFLA information twice once by regular mail and the other by certified mail.
4. That County Counsel determine the extent of efforts the County is required to undertake to identify if an employee is experiencing a qualifying event.
5. That HR clarify with departments its expectations regarding when the 80-hour letter is to be provided to employees.
6. The 80-hour letter be revised to improve its clarity.
7. That when a department determines an employee is not eligible, HR reviews the determination prior to the employee being notified of the denial.
8. The County establish a single file retention method for FMLA/OFLA documentation, if feasible.
9. That HR seek the input of Counsel as to the importance of obtaining a signed declination form and then determine the extent to which efforts should be made by County departments to obtain a signed form when an employee declines FMLA/OFLA.
10. Once the processes are more dialed in regarding Oregon's new Paid Leave law, evaluate whether a reporting function can be developed to help departments track leave hours.

## Introduction and Background

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Human Resources (HR) asked Internal Audit (IA) to interview a sampling of departments regarding their procedures for administering FMLA/OFLA leaves and to review a sample of those departments' files. The request was made because Oregon's new Paid Leave Law is going into effect in 2023 and the timing was right to evaluate the effectiveness of the current FMLA/OFLA process and determine whether any changes are warranted in preparation of Paid Leave Oregon.

The County has a decentralized approach, with each department responsible for administering the process for its own employees. Therefore, we met with or talked to representatives from a sampling of departments which included the Airport, Assessment, Community Justice, Clerk's Office, HHS, IT, Roads/Parks, and the Sheriff's Office. We also met with Payroll to get its perspective.

It is worth noting that auditors can review and report on events that occurred in the past but that those events don't always reflect how things are being done currently. Turnover in a large department illustrates this point. According to a conversation with that department's administration and our understanding of the situation:

*The department had a long-term employee who had been responsible for FMLA OFLA and all the other HR things and that employee had an excellent understanding of FMLA OFLA. After that employee left, she was replaced and the replacement was not well trained. The replacement left after less than a year. The replacement's replacement is being trained by HR and so now the department's management has confidence that things will improve.*

Related to this type of situation, when the audit was announced individuals from a few departments reached out to tell us that we would find problems with their older files but that over time they had learned the correct way to process files.

Given the continual evolution of learning and processing, and because this project is focused on ensuring things are done right in the future, we approached this less as a traditional audit and more as an information gathering exercise that can inform a needs assessment and gap analysis.

**Audit Authority**

We conducted our audit in accordance with Codified Ordinance 218 pertaining to the County Auditor. This audit was not initially included in our fiscal year 2022-2023 Internal Audit Plan and was added at the request of the HR Director.

**Compliance with Government Auditing Standards**

We conducted this performance audit in accordance with generally accepted government auditing standards. These standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. Additionally, the standards address the importance that auditors be independent of management. The Internal Audit program operates in compliance with the generally accepted government auditing independence standard for internal audit shops.

**Confidential or Sensitive Information**

We did not withhold information that would be considered sensitive or confidential.

**Audit Conclusion**

In general, the County processes leaves in accordance with FMLA/OFLA requirements but there is a risk of non-compliance because:

1. Not everyone who needs to know at least some part of the FMLA/OFLA process is trained;
2. There is not a uniform understanding of when the leave process needs to be triggered; and
3. Record keeping practices vary from department to department.

**Audit Objectives, Scope & Methodology**

Our audit objectives were:

1. To evaluate whether current practices provide adequate assurance that County departments are adhering to prescribed practices relating to FMLA / OFLA  
and
2. To identify areas where Human Resources (HR) should take action to ensure future compliance with FMLA / OFLA in preparation for Oregon’s new Paid Leave law.

Our audit procedures included:

- We met with Human Resources (HR) to gain an understanding of FMLA / OFLA statutory requirements and HR's expectations of the County departments.
- We read through FMLA and OFLA requirements, and County Policy #5-46b Protected Leave.
- We interviewed a judgmental sample of County departments to gain an understanding of their practices and to identify their concerns.
- In conjunction with the interviews, we reviewed a haphazard selection of a few files to determine if documents are maintained in accordance with requirements and expectations.

## Chapter – Results from Interviews and FMLA/OFLA File Reviews

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Human Resources (HR) has developed procedures to ensure compliance with FMLA/OFLA requirements. However, department practices sometime deviate from the prescribed procedures. In our limited file review, we did not identify any instances of statutory non-compliance. Nonetheless, the lack of uniformity increases the risk that an incidence of non-compliance could occur in the future.

*This Chapter generally follows the chronological steps in the FMLA / OFLA process, and the results from our interviews with departments and review of their FMLA/OFLA files. Focus is on communicating where we found gaps between the prescribed practices and the actual departments and on discussing the risks that result from those gaps.*

### SECTION 1: Interview Results

#### Determining that Leave may Qualify and Initiating the FMLA/OFLA Process

There does seem to be a risk of the County not fulfilling its obligation to inform employees that the employee is experiencing a health event that may qualify for FMLA/OFLA leave. However, we are unclear as the extent of effort an employer is statutorily required to undertake in order to identify if an employee is experiencing a FMLA/OFLA qualifying event.

A Department of Labor FMLA guidebook provides the following guidance regarding the notification requirement for FMLA (boldface added):

*As soon as an employer has enough information that indicates an employee's need for leave may be for an FMLA-qualifying reason, the employer should begin the FMLA leave process. An employer's management team and leave administrators play a vital role in ensuring FMLA compliance. **Managers, assistant managers, supervisors and leave administrators must be able to recognize FMLA-qualifying reasons for leave and properly initiate the required notifications and eligibility checks.**<sup>1</sup>*

The notification process (i.e., providing a packet of information and eligibility forms) begins with a department identifying that an employee may be absent for a qualifying event or when an employee provides notice to the County that leave is needed. Qualifying events are categorized as either a known event (e.g. upcoming child birth or a planned and pre-scheduled surgery) or as an unknown event (e.g., accident or sudden illness).

County Policy #5-46b Protected Leave establishes the employee's responsibility to inform the County of an upcoming known event. The policy states:

*Employees are required to give the County 30 days advance notice of the need for leave when it is foreseeable.*

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<sup>1</sup> <https://www.dol.gov/sites/dolgov/files/WHD/legacy/files/employerguide.pdf>

When the event is unknown, the same policy states:

*If the reason for leave is unforeseeable, absent unusual circumstances, the employee must provide the County notice as soon as practicable and generally by the next business day.*

The likelihood of a packet not being given is higher with an unknown event than a known event.

Our interviews didn't give us confidence that there is a countywide agreed-upon understanding of when the process needs to be initiated for an unknown event or that all appropriate management personnel are knowledgeable of this requirement. Here are a few anecdotes that illustrate why we lack confidence:

- When one of the audit staff tested positive for COVID-19 but didn't have serious effects, I didn't even think about giving them a FMLA/OFLA packet. I assumed they'd be back to work in a week, I had no issues with their attendance, and though I had a general understanding of FMLA/OFLA I wasn't aware of this particular requirement. I only learned of this requirement because we are doing this project.
- A large department HR administrator expressed uncertainty that all newer supervisors in that department would know when to start the process.
- A medium sized department HR administrator indicated that informal communication more than formal communication is how she often learns an employee may have an eligible event.
- Two interviewees expressed that there is some belief that being absent 3-days is a trigger for initiating the process. Another interviewee stated that being absent 3-days doesn't require the County to give an employee a packet, but that many people think it does.

*Note: We couldn't conduct a test to determine when the County failed to give packets in situations that required packets to be given. We could run a report that identified when an individual was out sick for multiple days, but we wouldn't know if the reason required a packet to be given.*

#### Maintaining files confidentially and separate from personnel working files

There seems to be minimal risk that HIPAA protected information may be seen by employees who do not have a need to see the information. We identified that one department kept some paper FMLA/OFLA documents in a secure location, however, the documents were in the same location as personnel files are kept.

The FMLA/OFLA documentation is assumed to contain medical information that is sensitive and protected under HIPAA. Therefore, the County instructs departments to maintain the files in a secure and confidential location, and also separate from the employee's personnel files as personnel files can be potentially accessed by multiple management employees.



The manner in which files are maintained varies from department to department, but our observations and interviews indicated most departments maintain files confidentially and separate from personnel working files.

Our interviews identified that there are multiple ways that files are maintained. Some departments use hardcopy files, while others use a hybrid of paper and electronic. Overall, based on observation and interviews, files are kept securely, confidentially and for the most part separate from personnel files.

- We identified one department that kept some FMLA/OFLA information in an electronic folder and other information in a paper file. The information in the paper file was not separate from the personnel file.
- One department used Laserfiche to save the electronic records, while other departments' HR administrators used their employee network drive or a secure department shared network drive.

The main risk for using the employee network drive is that these drives do not meet the State of Oregon's electronic record archive requirements. There are two other concerns with the HR department administrators using their own employee drive. One risk is the risk the department would not be able to access the files if the administrator was unavailable for a short period of time. The second risk is that when the HR administrator leaves County employment, the supervisor may not be able to locate and then relocate the files.<sup>2</sup>

- One department was under the impression that Laserfiche did not meet the confidentiality requirements and therefore does not use Laserfiche to save files. Per IT, Laserfiche is an allowable storage method if the information is retained in a separate folder that is configured with the appropriate security.

#### Documenting that packets were provided to employees

There seems to be minimal risk that the County would not be able to defend itself against a claim that it did not provide an employee with a packet if the County had provided the packet. One department did not obtain a signed notice of receipt when packets were hand delivered.

HR wants departments to obtain a signed acknowledgement of receipt when packets are hand delivered. HR wants departments to mail a packet through standard mail and also mail a copy through certified mail.

There was some variation in the manner in which departments documented that packets were provided. Our interviews identified:

- One department indicated that they do not receive a signed acknowledgement of receipt when hand delivering a packet to an employee. The department does check-off on the checklist how the packet was provided and the date provided to the employee.

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<sup>2</sup> According to IT, standard practice is to grant 21-day access to a supervisor when a direct report leaves to review files.

- All other interviewed departments indicated they follow HR's prescribed process. One department has the employee sign a copy of the packet provided that is maintained in the employee's FMLA/OFLA file. Remaining departments use the acknowledgement template form.
- At least one department will email the packet to an employee in certain circumstances. The email received notification will then be retained as evidence of packet delivery.

Additionally, some departments questioned whether mailing two copies (certified and standard mail) is necessary. It was suggested that if an employee receives a packet through standard mail, the employee typically won't bother to pick-up the certified copy. I can attest that does occur because when I received a packet and knew what the post office 'please pick up a certified letter' notice was for, I didn't bother picking up the certified copy.

#### Documenting when an employee declines to use protected leave status

The County does not always receive signed notices of declination when an employee chooses to not use FMLA/OFLA.

HR has a FMLA/OFLA Declination form by which an employee acknowledges that they decline FMLA/OFLA. The form serves two purposes. First, it documents that the County offered the employee FMLA/OFLA. Second, it supports that time is not to be recorded as FMLA/OFLA leave.

There are two reasons the County does not always receive a signed form when an employee declines to use FMLA/OFLA. First, if the employee is no longer in the office when the qualifying event occurs (for example when the event involves an accident or sudden illness), getting a declination form signed can be challenging for the department. Second, some interviewees indicated that employees can be hesitant to sign the form.

Our interviews identified that:

- One department indicated that they do not follow-up with the employee.
- Other departments indicated that they do follow-up with the employee or resend the form to the employee.

We recommend that HR seek the input of Counsel and Payroll as to the importance of obtaining a signed declination form and then determine the extent to which efforts should be made by County departments to obtain a signed form when an employee declines FMLA/OFLA.

#### Determining that an event and employee are eligible for FMLA/OFLA

We cannot offer an opinion as to how often an eligible employee is denied or an ineligible employee is granted protected leave status.

Eligibility is based on both length of employment, hours worked and the type of event.

The HR checklist does not have a reminder to ensure that eligibility of the employee is checked as part of the process.

For events that require a medical certification, all departments reported that they use the completed certification to determine whether the event is eligible. Additionally, they all reported they would contact their HR consultant if they were uncertain. There is the risk that the department can be simultaneously certain and also incorrect about that certainty.

Two departments indicated that they have been with the department for a long time and know which employees are eligible and that they would double check all new employees for eligibility. All departments indicated that they would contact HR with any questions.

Because the risk of denying an eligible person is greater than the risk of granting leave to a person who doesn't meet the qualifying criteria, we recommend that any potential denial be submitted to HR for its review.

#### Eligibility Determinations and Related Documentation

Per County Policy #5-46b Protected Leave:

*FMLA and OFLA require employers to notify employees in writing of their eligibility to take family leave within five business days of a request for leave or the acquisition of enough information to determine that leave may be for a qualifying purpose.*

- Interviewees all seemed aware of this requirement.
- Departments indicated that they send out the eligibility notice the moment they get the medical certification and have reviewed it. Some indicated that they use the checklist to ensure they are completing all required paperwork. One department indicated that they put a reminder on their Outlook calendar, since they have missed providing timely in the past.

#### Tracking FMLA/OFLA hours used

Departments indicated that they have a method to track the FMLA/OFLA hours used by employees. Typical tracking methods included using Excel spreadsheets and/or pull payroll information from the County's financial system. The department HR administrators are for the most part involved in the department's payroll cycle, therefore, they understand the hours used. Additionally, they reported the number of FMLA/OFLA events are few enough that they remember to monitor each lengthy absence.

Multiple interviewees mentioned they would like to have a payroll system report to help with tracking FMLA/OFLA hours. A report of this nature would be a time saver. One department indicated that they created their own custom report.

### Sending “the 80-hour letter” to employees on leave

There is a risk that the letter is not being sent to all employees who have 80 hours left of FMLA/OFLA leave.

One large department indicated it only provides the letter to employees on unknown leave. The department does not send the letter to an employee on known medical leave (e.g., maternity leave).

We were unclear as to when an 80-hour letter is required by HR and when it isn't. Per discussion with HR, the 80-hour letter is not required under FMLA/OFLA requirements and the letter is to help the County with scheduling and planning purposes. The HR checklist states “When applicable, send a letter to the employee informing them that they have 80-hours of leave remaining.” Per HR, sending out the letter is situational and the templated letter can be modified for each situation.

Because departments had tracking methods, the issue appears to revolve around understanding when a letter needs to be sent and when it doesn't.

Additionally, we observed that the letter is lengthy and can be confusing to a reader. The letter addresses many interrelated topics and we found it did not clearly communicate what actions are required of the employee. We recommend that the letter be revised so that general information and needed actions are clearly delineated.

### Tracking when employee is to return to work

Our interviews indicated that departments have a method to track when an employee is coming back to work. These methods include but not limited to putting a reminder on outlook calendar and reviewing employee FMLA/OFLA files each pay period.

### Letter to finance and payroll

Some departments indicated that they do not know what the forms are used for. Also, one department said it is more difficult with the intermittent events to determine an end date and/or sending the form marked as event ended back to Finance in a timely fashion. One department indicated that they are aware that they miss this form at times, and there hasn't been any response from Finance and Payroll that it is missing. Therefore, there is a risk that these forms can be overlooked and not provided to Finance and Payroll at all or in a timely fashion.

### Retention requirements

Two departments indicated that they were not clear on what the requirements were. They both error on the side of keeping the records longer. We did not ask all departments this question.

### Training department HR Administrators

There currently isn't a process in place to ensure HR administrators are trained. We were told information is shared during the quarterly administrators' meetings facilitated by HR and through emails. One department indicated that there isn't a centralized depository for this information if there was a need to refer back to it and suggested a manual would be helpful.

- Individuals may have been initially trained as part of the County manager's training course, but haven't received refresher training. For some the manager's training course may have been years ago. Also, they may not be involved in the administrator meetings facilitated by HR.
- A medium-sized department's HR administrator reported they were never formally trained.
- In two large departments a new divisional HR administrator is being trained by the department's other HR administrator, and not HR, which increases the risk this person is not receiving current, accurate info.

### Ensuring Appropriate Personnel (Managers and Supervisor) Understand the Law

It does not appear that all new managers are trained on FMLA/OFLA. The manager or supervisor is often the first point of contact when a person calls in sick (unless they have a call-line). Therefore, in a large department the designated HR administrator may not even know about an employee being out. In the very small departments with only one or two managers, the risk is lower since the manager is often the HR administrator.

Here is an anecdote regarding the lack of training:

- An HHS manager reported that they happened upon a series of recorded management training videos on the county website but that no one had ever mentioned anything about FMLA/OFLA to them. The manager first received training on this topic about 9 months after the manager was hired. The training occurred after it was determined leave had been granted for an unqualifying reason to an HHS employee, which triggered HR doing a training for HHS managers. [Note: This manager was hired during the period when HHS had the new HR administrator who lasted less than a year.]

Additionally, there is a risk that even trained managers and supervisors will not accurately understand the law or the County's responsibilities. The term "a serious health condition" is vague and open to interpretation. The challenge of determining whether an event involved a "serious health condition" came up in at least two interviews. Also, all interviewees indicated that if they were *uncertain* as to whether a leave qualifies, they would contact their HR consultant. Assuming they weren't just saying that because it is the obviously correct response to give to an auditor, there is the risk that they do not know that their understanding is incorrect or outdated.

Federal regulations provide some guidance and HR has developed a flowchart that can be used to determine whether an employee's situation meets the criteria. We did not make specific inquiries to determine the extent to which department representatives were aware of HR's flowchart.

## SECTION 2: Risks and File Review Results

Below are the risks we identified and our related recommendations to address these risks.

- Risk that managers, supervisors, and department HR administrators are not properly trained. We understand HR is working to revamp the training program and will use the results of this study when developing the training material.
- We recommend training be provided and that the training be ‘responsibility focused’ to avoid information overload. By ‘responsibility focused,’ we mean that employees primarily need to know what is expected of them, they don’t necessarily need to know everything about the law. For example, managers and supervisors need to understand their role in identifying when an employee may be experiencing a qualifying event and whom they should contact when that occurs, but unless they are a department HR administrator they don’t necessarily need to know anything beyond that.

Addressing the training risk should mitigate against the remaining risks, which are:

- Risk that an employee is not given a packet. We recommend that County Counsel determine the extent of efforts the County is required to undertake to identify if an employee is experiencing a qualifying event.
- Risk of an incorrect eligibility determination. We recommend that when a department determines an employee is not eligible, the department have HR review the determination prior to notifying the employee. The consequences of incorrectly denying eligibility seems greater than the consequences of incorrectly determining an employee to be eligible, therefore it would seem most efficient to have HR only review denials.
- Risk that an employee is not notified when the employee has used all but 80-hours of protected leave. We recommend that HR clarify its expectations regarding this notification requirement.
- Risk that an employee will not understand the 80-hour letter. We recommend the letter be revised to improve its clarity.
- Risk of not being able to produce documents and related risk of non-compliance with record retention. We recommend that the County establish a single file retention method. If having just one method is not feasible, the County should at least minimize the extent possible the number of methods being used.

### Variations from Prescribed Methods and Variations from One Department to the Next and Resulting Questions

We found during our review of department’s FMLA/OFLA files:

- One larger department uses its own checklist and not the one developed by HR.
- Some departments keep FMLA/OFLA paperwork electronically in differing locations/storage styles, while others keep it hardcopy.

- One larger department doesn't get a signed acknowledgment of receipt when packets are hand delivered to employees or delivered via interoffice mail. They do notate the method of delivery and date delivered on the checklist.
- One larger department indicated that they do not send out the "80-hour remaining" letter for known events. However, it may be unclear when this letter should or should not be sent since it is situational.

For the most part all departments had all the required paperwork maintained. We did run into one larger department had a few items missing from their files, however, they were in the process of training another employee to help with the process and those documents may still need to be added to the files.

#### Questions We Have and Areas Where Clarification is Needed Based on File Review and Interviews

- We are uncertain as to the extent of the County's legal responsibility to identify a potential FMLA/OFLA situation and then provide the paperwork to the employee. Below is a paragraph from a Department of Labor document:

*As soon as an employer has enough information that indicates an employee's need for leave may be for an FMLA-qualifying reason, the employer should begin the FMLA leave process. An employer's management team and leave administrators play a vital role in ensuring FMLA compliance. **Managers, assistant managers, supervisors and leave administrators must be able to recognize FMLA-qualifying reasons for leave and properly initiate the required notifications and eligibility checks.***<sup>3</sup>

It seems to indicate that the employer must be able to recognize a FMLA-qualifying reason but does that mean an employer has to ask determining questions when an employee calls in sick?

- What criteria distinguishes a "serious health condition" from a non-serious health condition? The challenge of determining whether an event involved a "serious health condition" came up in at least two interviews.

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<sup>3</sup> <https://www.dol.gov/sites/dolgov/files/WHD/legacy/files/employerguide.pdf>

### **SECTION 3: Comments provided by Departments and Other Information**

- Departments expressed that more automation capabilities with reports and forms that auto-populate would help save time. One department has pre-filled out forms and a couple departments indicated that they have pre-printed packets to be used as needed. There is a risk that the pre-printed forms might not be the most up-to-date. One department did note that they do periodically check the County's intranet to ensure all pre-printed information is up-to-date.
- One department wondered if the posters that are in the packet need to be provided to the employee. One department indicated that they tailor the packet depending on the employee's situation.
- Two departments mentioned that when an employee needs to be provided a FMLA/OFLA packet and the employee has taken FMLA/OFLA leave in the last 12-months, the department HR administrator looks-up how much time the employee has previously taken. This information is provided to the employee with the new packet. We mention this because we do not know if other departments do this, however, we did not specifically ask this question of other departments.



## Summary of Recommendations

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We recommend:

1. A “responsibility focused” training program is developed and implemented to ensure department HR administrators and new managers/supervisors are trained on FMLA/OFLA.
2. HR and County Counsel review, and as-needed update, existing guidance intended to help departments distinguish between a serious health condition and a not serious health condition and then provide training opportunities to applicable county staff.
3. HR reevaluate the need for mailing the FMLA/OFLA information twice once by regular mail and the other by certified mail.
4. That County Counsel determine the extent of efforts the County is required to undertake to identify if an employee is experiencing a qualifying event.
5. That HR clarify with departments its expectations regarding when the 80-hour letter is to be provided to employees.
6. The 80-hour letter be revised to improve its clarity.
7. That when a department determines an employee is not eligible, HR reviews the determination prior to the employee being notified of the denial.
8. The County establish a single file retention method for FMLA/OFLA documentation to help ensure record retention requirements are being met. If having just one method is not feasible, the County should at least minimize to the extent possible the number of methods being used.
9. That HR seek the input of Counsel as to the importance of obtaining a signed declination form and then determine the extent to which efforts should be made by County departments to obtain a signed form when an employee declines FMLA/OFLA.
10. Once the processes are more dialed in regarding Oregon’s new Paid Leave law, evaluate whether a reporting function can be developed to help departments track leave hours.

## Management Response

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Human Resources reviewed the recommendations with the County Audit team and is not surprised by the findings. The ten recommendations are reasonable approaches to streamline and clarify the process countywide for all who are involved. Human Resources has already begun working toward implementation of the ten recommendations.

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