

Human Resource Audit Report

for

UNIFIED GOVERNMENT OF WYANDOTTE COUNTY AND KANSAS CITY, KANSAS

Completed by



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INTRODUCTION AND METHODOLOGY

The following report summarizes an assessment of the human resource practices of the Unified Government of Wyandotte County and Kansas City, Kansas (“UG or Unified Government”). The purpose of the assessment was to analyze human resource practices in order to understand where the human resource function currently stands and help prioritize the issues that need to be addressed. The focus of the assessment was four-fold:

1. To examine compliance with established regulations;
2. To explore how to better serve the needs of management and employees;
3. To examine the work processes used to carry out functional work such as recruiting, compensation, training, benefits, employee relations, etc.; and
4. To establish an “early warning system” to spot problems or identify issues before they become crises.

It is important to note that the UG employs approximately 2,200 employees and human resources is staffed with 18 employees. While the purpose of this report is to highlight potential problem areas before they grow and fester into major issues, it is important to note that the vast majority of functions within the UG’s human resources department are functioning ineffectively. Those areas discussed in this report include the following:

- **Hiring Practices**
- **Policies and Procedures**
- **Employment Files**
- **Performance Management System**
- **Compensation**
- **Equal Employment Opportunity Plan**
- **Termination**
- **Service Quality**
- **Level of Know-How**

In order to understand the human resources functions and how to improve service delivery and deliverables, the Meriweather Group (“TMG”) conducted individual interviews with leadership staff; reviewed employment files both active and terminated; and reviewed employment related documents that included applications, forms, communications, etc. It is also important to note that not all up-to-date documents were submitted due to a cyber breach of the Unified Government’s computer system.

Our findings and recommendations are included in the “Summary of Findings” section that follows:

SUMMARY OF FINDINGS

Hiring Process

The hiring process is the first and most important step in building the best staff for your organization. It is important that employers ensure consistency and that the best hiring decisions are made in compliance with the law. The process should be consistent across the organization as it relates to proper screening, hiring strategies, recruiting of a diverse workforce and clear establishment of the terms and conditions of employment. All of these factors play an important role in enhancing employee retention and minimizing the risk of employment litigation.

The Unified Government has developed a system that can be fraught with inconsistencies and can open the UG to accusations of disparate impact. In order to improve its recruiting and selection process, the Meriweather Group recommends the following.

Recommendations:

1. Review recruiting processes and documents
 - A. Update the Personnel Action Notice ("PAN") to ensure that it captures information that is directly related to the actions intended. Remove the request for social security numbers and birthdates. That information should be kept confidential and should already be located within human resources.
 - B. Streamline the recruiting process so that all approvals are given prior to the "hire offer". Requesting additional approval from the County Administrator after the "offer" can slow the process and increase the potential of losing a new hire. Prior to posting a position and going through the hiring process, the County Administrator's office should have already approved a new hire including identifying a salary range. It appears that there could be an unnecessary delay if the County Administrator's office offers approval or disapproval after the fact.
 - C. All of the documents acquired during the recruiting process must be maintained by Human Resources. Copies of qualified resumes, applications, etc. shall be passed on to the hiring manager.
 - D. It is Human Resources responsibility to ensure that all appropriate documentation is obtained and completed including signatures, interview questions, reference and employer checks, etc.
 - E. Human Resources must ensure that the appropriate application and questionnaire is supplied to an applicant.
 - F. Human Resources must ensure that all skills or pre-employment test are both reliable and valid. All tests should have also been approved by the appropriate governing body. This too is the responsibility of human resources.

NOTE: It appears that Human Resources has “pushed” down the recruiting functions that should be performed by the HR department. This could open up the UG to inconsistencies in the hiring process. There should be no expectations that department directors and or managers will be fully informed regarding employment law, that will be the responsibility of the HR department. Pushing down the functions can also open the UG up to legal issues like disparate treatment and or disparate impact.

2. Review and update the employment application

A. While it is not illegal to request the social security number on an employment application, a social security number is not directly related to an applicant’s ability to perform a specific job. Typically, the social security number is required to conduct criminal background and credit checks. After an offer is made, it would be most appropriate to request the social security number and all other needed information required to complete a thorough background check.

3. Update the Equal Employment Opportunity Survey and ensure it is used correctly

A. Ensure that the EEO Survey is not attached to the application and is not forwarded to anyone outside of the human resources department. It was reported during the leadership interviews that they have received copies of the form. The forms must be kept confidential to ensure that a hiring decision is not based on any of the “protected categories”.

B. Solicit only information that is relevant to completing an “applicant flow” data report and for completing the Equal Employment Opportunity Plan. A sample form is included in appendix A.

- Remove questions regarding age
- Remove questions regarding education. That information is solicited on the application.
- Remove questions regarding marital status
- Remove the section “how did you learn about this job”. That information is solicited on the application
- Expand the “veteran status” section to include wording recommended by the Department of Labor (“DOL”).

The Department of Labor has also developed a questionnaire in order to obtain “disability” information. A copy can be obtained via the DOL’s website—in that, the form cannot be copied or printed.

4. Write and or update job descriptions

A. Currently the UG uses the job classifications as job descriptions. Job descriptions should always be written about the position’s job responsibilities. The job classification is a process of evaluating the information contained in the job descriptions and should not be used as a substitute. Clear, concise, and up-to-date job descriptions should be maintained for all positions.

B. Job descriptions should contain a summary of the job, identify essential responsibilities and outcomes, and include requirements and preferences. TMG is

including a position description questionnaire (“PDQ”) in appendix A that will be useful in gathering data consistently across the UG in order to develop job descriptions.

5. Ensure all job descriptions are in compliance with Fair Labor Standards Act
 - A. Upon reviewing the job classifications submitted and information gained during the interviews, there is the strong possibility that some administrative and professional jobs are not classified correctly according to the Fair Labor Standards Act. It is important to ensure that jobs are properly classified. TMG is including a questionnaire that will be helpful in correctly classifying positions. The questionnaire is contained in appendix A.

Policies and Procedures

The employee handbook is an important communication tool between the Unified Government (“UG”) and its staff. The purpose is to set forth expectations for the staff and describe what staff can expect of the UG. Most importantly, the handbook cannot contain every issue that could possibly be experienced by staff, the focus should be universal concerns which can typically occur in the workplace. The Meriweather Group (“TMG”) did not receive a copy of the Unified Government’s Employee Guide. That could be due in part to the cyber breach. However, TMG did receive a copy of the employee orientation package and there was no mention of an employee handbook. The package included policies regarding the following:

- Code of Ethics
- Responsible Use of Information Technology policy
- Harassment in the Workplace and Equal Opportunity in Employment policy
- Worker’s Compensation and Injury Leave Policy
- Driver Safety and Accident Reporting Policy

Recommendations:

It is crucial for the UG to develop an up-to-date all-encompassing employee guide. The policies reviewed by TMG were developed in 2004, 2005, 2007, 2014, etc. The employee handbook or employee guide should give employees a detailed overview of policies that are specific to the Unified Government along with other key procedures, guidelines and employee benefits. It should set clear expectations for all employees while also stating legal obligations and defining employee rights. The employee guide can help protect the UG against employee lawsuits and claims, such as wrongful termination, harassment and discrimination.

Employee Files

An organized system for gathering information and maintaining records for job applicants, current employees, and former employees is essential to the Unified Government for carrying out management and administrative functions and to properly comply with legal requirements.

The Unified Government *is not properly maintaining employee files*. During the leadership interviews, we learned that a number of managers maintain their own employee files. Some indicated that they maintain all personnel files including confidential medical information.

The Meriweather Group will typically review a sample set of files to include active and inactive. When we entered the area in which employee files are kept within the human resources department, it was clear that files were incomplete. We reviewed one personnel file that belonged to an employee who was hired in 1990. The personnel file lacked the following:

- an up-to-date job description
- performance reviews
- interview notes
- education verification
- employment verification
- reference checks
- up-to-date emergency contact
- disciplinary action reports and documents

In addition to incomplete personnel files, human resources do not maintain centralized confidential medical files for each employee. It appears that the human resource associate responsible for employee benefits maintains her own files for each employee. The human resource associate responsible for family medical leave maintains a separate set of files for each employee as does the human resource associate responsible for worker's compensation. None of these files are kept in a centralized location, each human resource associate has their own set of employee files. This process of decentralizing files is ineffective and ill advised. The files should be kept together in a secure centralized location within the human resources department.

We also requested to view the I-9 files. The person responsible for gathering and maintaining I-9 information was not in the office, hence neither the director nor manager of human resources could readily locate the I-9 files.

Recommendations:

General Personnel Files: All employee files should be centrally stored within the human resources department in a secure location and be kept strictly confidential. Access should be restricted to those with a legitimate need to know or as required by law. Hence, managers, directors, assistant county administrators, should not maintain confidential medical files. They may maintain copies of personnel files but all information, documents, etc. must be maintained within the human resources department. Not keeping certain information confidential can result in lawsuits, identity theft, data breach, or defamation lawsuits. It can also undermine the human resources department's credibility and integrity.

Medical/ Health Related Files: The Americans with Disabilities Act (ADA) requires that employee medical records be maintained confidentially and separate from an employee's general personnel file. This includes employee medical exams, disability benefits claim forms, notes from doctors, requests for Family and Medical Leave Act (FMLA) leave, requests for ADA accommodations, worker's compensation history, claims and related documents, fitness-for-duty results, functional capacity assessments, referrals concerning an employee's participation in the company's employee assistance program, results of drug/alcohol tests, reimbursement requests for medical expenses, health-related information about an employee's family members, and any documentation about past or present health, medical condition, or disabilities. This file would also contain health insurance enrollment, continuation forms and COBRA notices.

Confidentiality of medical records under Title I of the Americans with Disabilities Act ("ADA") requires employers to collect all information obtained regarding an applicant's and/or employee's medical condition or history on separate forms and in separate medical files and to treat such information as confidential medical records. This protection covers all applicants or employees, regardless of whether they are a qualified individual with a disability under the ADA. However, the ADA does carve out three exceptions from this general confidentiality mandate: (i) **supervisors and managers may be informed regarding necessary restrictions on the work or duties of the employee and necessary accommodations**; (ii) first aid and safety personnel may be informed, when appropriate, if the disability might require emergency treatment; and (iii) government officials investigating compliance with this provision of the ADA shall be provided relevant information upon request.

Note: Supervisors and managers should only be informed of the necessary work restrictions and

accommodations. It is imperative for the Unified Government to remove all medical files from the departments and place the information in a secured confidential location within the human resources department.

Hiring Records: A hiring file includes the documents and actions taken for the hiring of each position. Included are job advertisements, resumes, employment applications, job orders submitted to any agency, interview evaluations, reference checks, results of physical examinations, employment test results, credit reports, validity documentation of tests used in the selection process, applicant data for candidates not hired, and related information. These records must be maintained for candidates that are *hired as well as those that are not*.

Employers subject to affirmative action requirements must maintain records related to their hiring and selection, including advertisements; job postings; applications; resumes; interview notes; requests for reasonable accommodations; tests and test results; personnel files; rates of pay and other compensation; selection for training or apprenticeship; and other information regarding hiring, transfers, promotions, layoffs and terminations. As part of their record retention obligations, employers subject to affirmative action requirements must also retain records relating to all individuals who meet the criteria of "Internet applicant," along with other employment records.

The Uniform Guidelines on Employee Selection Procedures (UGESP) are used by the courts to determine if unlawful hiring practices were the basis of a discrimination claim. Although not required by law, applicant tracking is recommended by these guidelines for all employers covered under Title VII and can be done pre-hire when it is part of an employer's decision to follow the guidelines. Adherence to these guidelines would strongly suggest an employer is free from unlawfully discriminatory hiring practices.

Hence, it is imperative that the human resources department take full control of the hiring process from start to finish. It is crucial that all documents are retained in a centralized filing system for all positions.

I-9 Forms: The Department of Homeland Security, specifically U.S. Immigration and Customs Enforcement ("ICE"), is charged with ensuring employers are compliant with the laws regarding maintaining I-9 documentation. An ICE agent may, at any time, serve a company with a subpoena, called a "Notice of Inspection" ("NOI") that requires the employer to provide ICE with the I-9's for every employee within three days of being served the subpoena. Failing to timely complete an I-9 for employees or improperly maintaining the information can result in fines of \$110 to over \$1000 per employee for the first infraction.

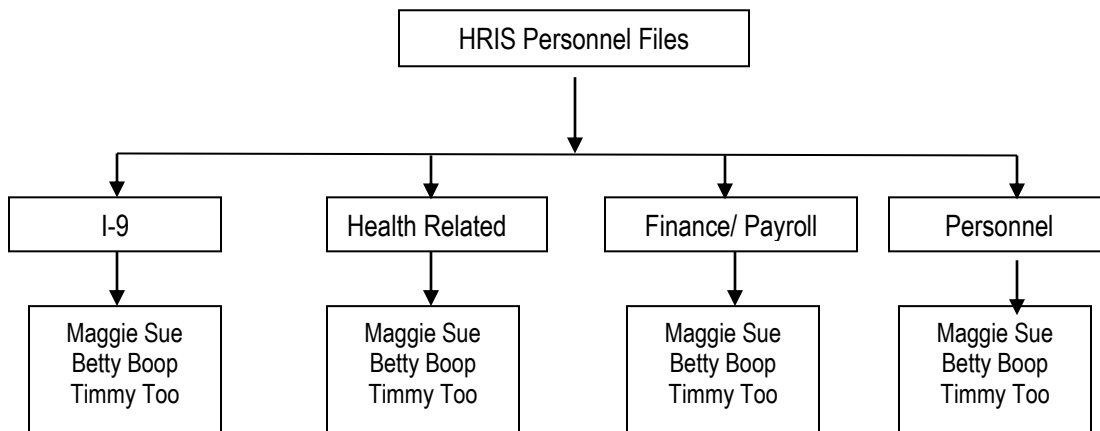
These fines impact large and small business alike. It is important to note that ICE has also issued

monetary fines for businesses where every employee was legally authorized to work in the United States but the employer *could not locate their I-9 forms*.

It is imperative that the Unified Government gather and maintain all I-9 forms in a place within human resources that is accessible by more than one staff person. It behooves the UG that at the very least the department director and or manager can readily locate all I-9 forms.

Payroll/ Financial Records: Payroll and financial records were not reviewed or discussed in that payroll is not a function of human resources, it is handled through the finance department.

HRIS/ Employee Filing Systems: As the human resources department implements its new HRIS system, it will still be imperative to ensure that confidential information be kept confidential. Going forward, the HRIS system should separate all documents related to each category: general files, financial files, and health related files. Under each category, develop a file for each employee. The I-9 files should be maintained in hard copy. The financial and health related files should have strict access limited to only those who “need to know”. A sample list of the information that should be contained in each file is shown in appendix A.



Typical Records Retention Timeframes

It is important to retain employee records during and after an employee’s tenure. The following list identifies the most common retention dates as identified by the Department of Labor. While time limits are identified for current and terminated employees, we recommend that current employee records are retained for the entire time an incumbent is employed. Furthermore, should the UG experience any legal issues regarding an employee or policy, then the UG should retain all records until the issue is resolved.

1. Hiring Records – to include resumes, applications, volunteer AAP information, interview notes, etc. must be maintained for one year after the final hiring decision is made.
2. Drug Test Records – must be maintained in the employee’s file for one year after the test. If your organization is subject to department of transportation regulations then the minimum time frame for maintaining drug test records is five years.
3. Payroll/Timecards, etc. – payroll and timecard records for non-exempt must be maintained for three years, however because of pay equity regulations it is wise to maintain the records throughout an employee’s entire tenure. The records must be retained for five years after termination.
4. Form I-9 – These files should be maintained for three years after hire and for one year following employment termination.
5. Health and Pension Benefits Information – These files should be maintained for six years. However, it is prudent to maintain these documents for the entire tenure of an employee and at least one year after termination because it is the responsibility of the employer to prove the accuracy of its pension contributions should any issues arise.
6. Family Medical Leave Act Records -- These records should be maintained for at least three years. However, it will be prudent to maintain these records the entire tenure of an employee and at least seven years after termination.

Compensation

The Unified Government uses a job evaluation system that compares jobs against other jobs within the UG to determine the appropriate pay rate. The evaluation system is then tied to a compensation structure that is developed using only benchmark jobs (which often only include approximately 30% of an organization’s positions). The system has not been overhauled within the past seven years by the organization that developed it. Hence, it is most likely outdated. In addition, reviewing a job to be reclassified is conducted by only one human resources associate. This process can be slow and subjective.

Recommendations:

Develop a compensation system that encompasses a thorough market analysis of pay to determine salary ranges. Because the Unified Government’s current structure has not been updated, there is a strong possibility that it is not competitive with the local labor market. In addition, economic conditions over the past few years have led to an increase in wages.

The current job evaluation methodology (“DBM”) has an internal focus as it ranks jobs and their relative importance *within* the Unified Government, whereas a market analysis of pay has an external

focus as it aims to compare the UG's pay rates with those in the wider labor market.

Developing a market analysis of pay will eliminate the need for the UG's current job evaluation system. We believe eliminating the system will allow more objectivity and fairness in pay. During our interviews, we learned that some departments are more successful than others with getting jobs reclassified. Hence, it will be imperative for the UG to conduct a "**pay equity**" analysis to ensure that an unintended disparate impact has not occurred using the current job evaluation methodology.

Pay Equity is the process of compensating employees the same when they perform the same or similar job duties, while accounting for other factors, such as their experience level, job performance and tenure with the employer.

However, should the UG decide to retain its current job evaluation methodology, it is imperative that a committee is formed to evaluate requested job reclassifications. The committee should represent the majority of functional areas within the UG. This could bring about more objectivity to the job evaluation process.

Performance Management System

The performance management system is one of the most important and valuable tools at an organization's disposal. A properly designed and executed system will become the vehicle through which communication is enhanced, strategic objectives are implemented, consistency in management is established, employee skills are developed and proper recognition and pay is objectively awarded.

While the UG does have a performance management system, it is a system that has not been used and is antiquated. The Meriweather Group learned that the Unified Government has not conducted performance reviews over the past years because they could not tie an employee's performance to pay. TMG believes that the UG should develop and implement an effective performance management system.

Recommendations:

1. Adopt a system that identifies job objectives and standards of performance for each job classification and are tied directly to the UG's strategic priorities. The system will strengthen the relationship between the employee and his or her manager. The job description format discussed in the "hiring" section is designed to identify job objectives and standards of performance.

The system should also contain key core competencies. The core competencies are measures of individual behavioral characteristics that define how employees should function within the UG. They define and reinforce the culture of the organization. Examples of core competencies include the following: ethics and values, teamwork, collaboration, leadership, creating alignment, etc. A sample copy of an effective performance management system is included in appendix A.

Termination Process

We expect that employees will grow and look for opportunities to expand especially if their current employer is constrained in regard to growth opportunities. It will be helpful for the UG to understand why employees might leave. Hence, developing an effective exit interview process can be helpful. The exit interview should never be an attempt to reverse a resignation, but instead it should be undertaken to reduce future turnover by learning what might be causing “good” employees to resign. Typical questions that are effective during an exit interview are included in appendix A.

Equal Employment Opportunity Plan

The Unified Government currently develops an Equal Employment Opportunity Plan (“EEO”). However, the plan is incomplete. It is imperative for the UG to develop a comprehensive plan in order to rectify any disparate treatment or disparate impact across the organization and within departments.

The Equal Employment Opportunity (EEO) plan is a comprehensive document that analyzes the relevant labor market data, as well as employment practices, to identify possible barriers to the participation of women and minorities in all levels of the workforce. Its purpose is to ensure the opportunity for full and equal participation of men and women in the workplace, regardless of race, color, or national origin.

The Unified Government submits its EEO Certification Form and Utilization Report portion of the plan to the Office for Civil Rights, but does not complete the other portions of the plan. Considering that the UG has been involved in discrimination lawsuits, it is imperative that the organization collect, analyze, and maintain data pertaining to the race, national origin and sex of applicants and employees in connection with the following employment practices:

- Recruitment
- Applicant screening
- Hiring
- Promotion

- Termination
- Transfer
- Discipline

Service Quality Dimensions:

Human resources provide a number of functions throughout the lifecycle of an employee’s tenure. Those services start with recruiting and end with separations, with a number of functions in between such as benefits, compensation, compliance, performance management, etc. Human resources play a significant role in ensuring that managers and directors across the organization treat employees fairly and consistently. In order to understand how leadership views the quality of human resources’ services, TMG asked them to rate the typical service dimensions. The majority of those interviewed found human resources to be unreliable, unresponsive, not always accessible, and inconsistent in communicating with leadership. A chart showing the responses is shown below:

Service Quality Dimensions		
Quality	Important	
	Well-served	Not Well-served
Reliability -- Ability to perform the promised service dependably, accurately, and consistently.	√	√√√√√√√√√√√√
Responsiveness -- Willingness to help and provide prompt service	√	√√√√√√√√√√√√
Courtesy --Politeness, respect, consideration, and friendliness of the staff	√√√√√√√√	√√√√
Competence -- Possession of necessary skills and knowledge to perform a given service	√√√	√√√√√√√√√√
Credibility -- Trustworthiness, honesty, and integrity	√√√√	√√√√√√√√
Accessibility -- Ease of contact and approachability	√√√	√√√√√√√√√√
Communication -- The process of keeping others informed, in language they can understand.	√√√	√√√√√√√√√√
Understanding Organizational Needs -- Design HR functions to meet organization goals and strategies		√√√√√√√√√√√√

Level of Know-How

In order for a human resources department to be successful, there needs to be a level of *knowledge*, experience, and expertise that is trusted by the employees that are served. The information gained through the “leadership” interviews indicates a lack of confidence in the human resources department to perform the required functions effectively and in a timely manner. It is critical that the department is

staffed appropriately with the required *education* and background to execute all functions. The number of employees staffing the department is adequate. However, the level of education may be inadequate. Because the UG is currently facing a number of discrimination claims, understanding legal and regulatory requirements is imperative. It is also imperative for the department to give advice and direction to managers when making employment related decisions.

Over the past five (5) years, the UG has responded to approximately 25 Equal Employment Opportunity cases that were filed with outside agencies. In addition, over the past two years approximately ten (10) cases have been settled that totaled more than \$2,000,000.00

Recommendations:

Going forward, it will be important to staff the human resources department with associates who have completed college coursework and or coursework required for human resource certifications. A human resources degree or business degree with a *human resources concentration* is generally expected for any level of human resources employment. An associate degree is the minimum requirement for most entry-level positions, while a bachelor's or master's human resource management degree is preferred for upper-level roles. It is imperative for a human resource professional to have the requisite education because the functions are complex and are often governed by state and federal laws and regulations. Information needed to successfully handle the day-to-day legal requirements can most effectively be gained through formal education or certifications. Typical staff within a human resources department providing services for a complex organization of more than 2,000 associates will have met the following educational requirements:

Entry/ Non-exempt Staff Member: Associate Degree in Human Resources: covers all the essentials one needs to know for entry-level positions. One can expect to study human resource theories and techniques, ethics, and employment law. Courses will also cover topics in employee recruitment, management, and training. Finally, one will also learn essential skills in compensation, benefits, and payroll.

Professional/ Exempt Staff Member: Bachelor's Degree in Human Resources: Alongside general education classes, in a human resources bachelor's degree one can expect to study topics such as:

- Employment Law
- Organizational Behavior
- Compensation and Benefits
- Workforce Planning: Recruitment and Selection

- Training and Development
- Staffing and Labor Relations
- Performance Management
- Strategic Human Resources Management

Director/ Management Staff Member: *Master's Degree in Human Resources*: Most top-level positions especially within larger organizations will require a Master's Degree in human resources or business administration (MBA) with an emphasis in human resources. A human resource management degree at the master's level typically focuses on honing leadership skills. In addition to typical business courses such as accounting, marketing, finance, management, statistics, etc. Direct coursework in human resources might also include the following:

- Diversity and Inclusion
- Strategic Human Resources Management
- Human Resources Management in the 21st Century
- Cultural Issues
- Labor Relations

Human Resources Certifications

While certifications are not required in human resources, they offer a great deal of credibility for those who do not have degrees specifically in human resources. Certification requires a combination of education, experience, and testing. Typical certifications include the following:

- **Professional in Human Resources (PHR)**
Exam covers employee and labor relations; business management; talent planning and acquisition; total rewards; learning and development
- **Senior Professional in Human Resources (SPHR)**
In addition to the areas covered in the PHR, testing focuses primarily on leadership and strategy; maintain certification by retesting or via continuing professional development credits
- **Senior SHRM Certified Professional (SHRM-SCP)**
In addition to the information covered in the PHR and SPHR, the SHRM-SCP is designed for professionals who develop strategies, analyze performance metrics, and align HR strategies to organizational goals

Conclusion

There are a number of basic human resource functions that if applied can improve the Unified Government's regulatory and day-to-day functions. They include the following:

1. Enhance the hiring process by (a.) updating the recruiting processes and documents, (b.) updating the employment application, (c.) updating the EEO survey, (d.) write and update job descriptions, and (e.) ensure all positions are properly classified according to the Fair Labor Standards Act.
2. Write and updated set of policies and procedures
3. Appropriately maintain a confidential centralized filing system for all employees by (a.) ensuring that all files are located within the human resources department, (b.) ensuring that confidential medical files are kept confidential, (c.) ensure that all I-9 forms are complete and available for review by appropriate legal entities when requested, and (d.) ensure all files are retained and disposed of according to Department of Labor regulations.
4. Update and implement and effective performance management system
5. Update and implement an objective market analysis of pay for all positions
6. Ensure that all documents and forms are developed and included in the Equal Employment Opportunity Plan.
7. Update the "voluntary information" form to include updated race categories, veteran status and disability information.
8. Ensure I-9 forms are properly filed for easy access.
9. Develop an effective performance management system.

The Meriweather Group would like to thank all the staff members who participated during the human resources audit.

APPENDIX A