

**GOVERNMENT OF THE DISTRICT OF COLUMBIA  
OFFICE OF THE INSPECTOR GENERAL**

**D.C. DEPARTMENT OF  
HUMAN RESOURCES – PART I**

**REPORT OF INSPECTION  
MAY 2008**



**CHARLES J. WILLOUGHBY  
INSPECTOR GENERAL**

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
Office of the Inspector General

Inspector General



May 16, 2008

Brender L. Gregory  
Director  
D.C. Department of Human Resources  
441 4<sup>th</sup> Street N.W., Suite 300S  
Washington, D.C. 20001

Dear Ms. Gregory:

Enclosed is our final *Report of Inspection of the District of Columbia Department of Human Resources (DCHR), Part One*. Comments from DCHR on the inspection team's 28 findings and 47 recommendations are included in the report.

In addition, we have enclosed *Compliance Forms* on which to record and report to this Office any actions you take concerning each recommendation. These forms will assist you in tracking the completion of action(s) taken by your staff, and will assist this Office in its inspection follow-up activities. We track agency responses to all conditions cited, and compliance with recommendations made in our reports of inspection. We request that you and your staff establish response dates on the forms and advise us of those dates so we can enter them on our copies of the *Compliance Forms*. We know that in some instances, matters beyond your control such as budget decisions impact on trying to set specific deadlines. We request, however, that you assign *target dates* based on your knowledge and experience regarding particular issues. Please ensure that the *Compliance Forms* are returned to the OIG by the response date, and that reports of "Agency Action Taken" reflect actual completion, in whole or in part, of a recommended action rather than "planned" action.

We appreciate the cooperation shown by you and your employees during the inspection and look forward to your continued cooperation during the upcoming follow-up period. If you have questions or require assistance in the course of complying with our recommendations, please contact me or Alvin Wright, Jr., Assistant Inspector General for Inspections and Evaluations, at (202) 727-2540.

Sincerely,

  
Charles J. Willoughby  
Inspector General

CJW/ef

Enclosure

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Letter to Brender Gregory

May 16, 2008

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The Inspections and Evaluations (I&E) Division of the Office of the Inspector General is dedicated to providing District of Columbia (D.C.) government decision makers with objective, thorough, and timely evaluations and recommendations that will assist them in achieving efficiency, effectiveness, and economy in operations and programs. I&E goals are to help ensure compliance with applicable laws, regulations, and policies, to identify accountability, recognize excellence, and promote continuous improvement in the delivery of services to District residents and others who have a vested interest in the success of the city.

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**ACRONYMS**

## ACRONYMS

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## ACRONYMS

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|                |  |
|----------------|--|
| <b>ASMP</b>    | Administrative Services Modernization Program      |
| <b>CPE</b>     | Continuing Professional Education                  |
| <b>DCHR</b>    | D.C. Department of Human Resources                 |
| <b>DCOP</b>    | D.C. Office of Personnel                           |
| <b>D/DCHR</b>  | Director of the D.C. Department of Human Resources |
| <b>DCMR</b>    | D.C. Municipal Regulations                         |
| <b>DPM</b>     | District Personnel Manual                          |
| <b>DCRA</b>    | Department of Consumer and Regulatory Affairs      |
| <b>EEO</b>     | Equal Employment Opportunity                       |
| <b>FTE</b>     | Full-Time Employee                                 |
| <b>GAO</b>     | U.S. Government Accountability Office              |
| <b>HPLA</b>    | Health Professional Licensing Administration       |
| <b>HR</b>      | Human Resources                                    |
| <b>I&amp;E</b> | Inspections and Evaluations                        |
| <b>MAR</b>     | Management Alert Report                            |
| <b>MESA</b>    | Management and Employment Services Administration  |
| <b>MPD</b>     | Metropolitan Police Department                     |
| <b>MSS</b>     | Management Supervisory Service                     |
| <b>NCIC</b>    | National Crime Information Center                  |
| <b>OAG</b>     | Office of the Attorney General                     |
| <b>OHR</b>     | Office of Human Rights                             |
| <b>OIG</b>     | Office of the Inspector General                    |
| <b>OPF</b>     | Official Personnel Folder                          |

## ACRONYMS

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**OPM** U.S. Office of Personnel Management

**OTR** Office of Tax and Revenue

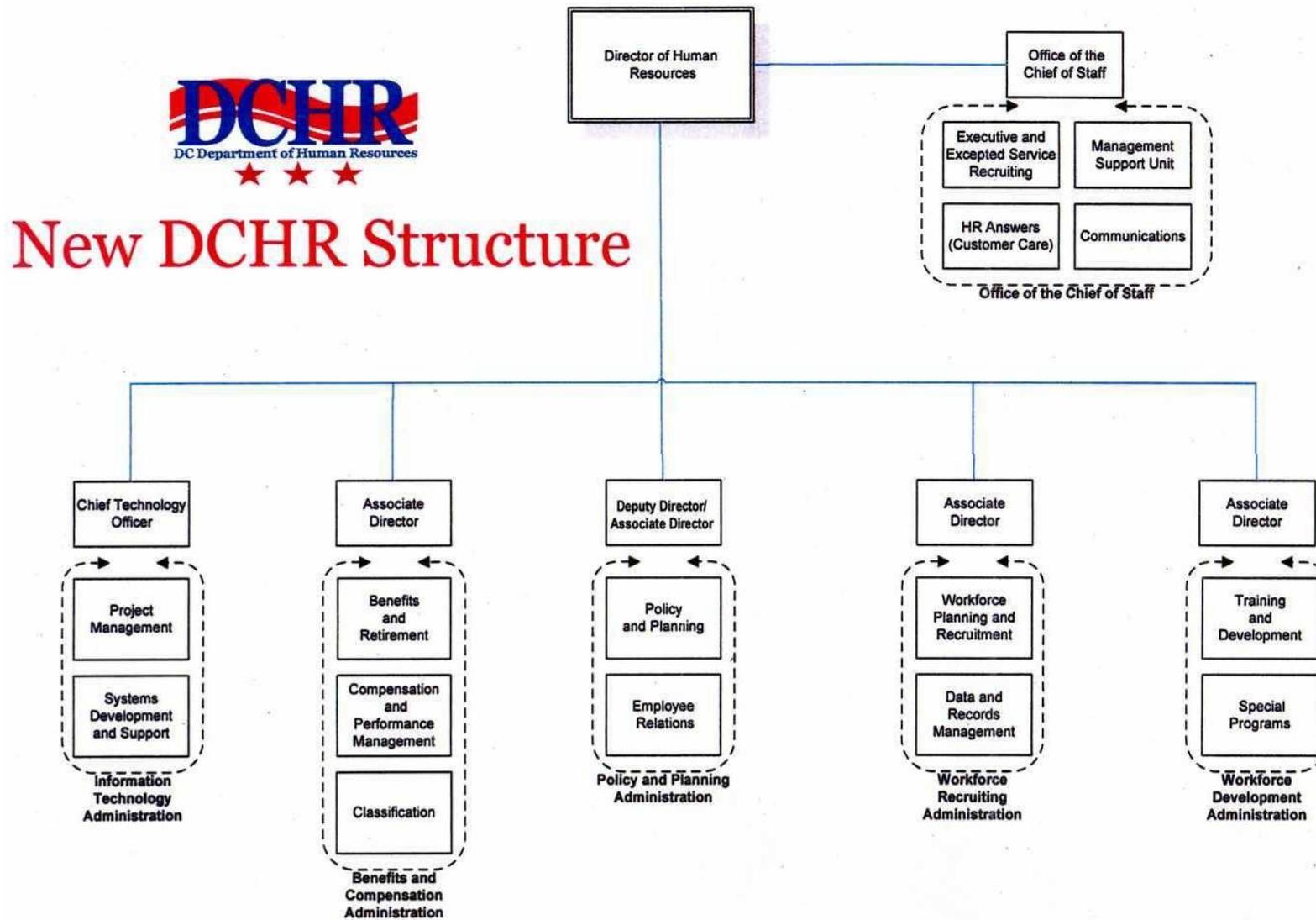
**ORGANIZATION CHART**

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**ORGANIZATION CHART**



# ORGANIZATION CHART



Organizational Structure Provided by DCHR on March 29, 2007

**EXECUTIVE SUMMARY**

## EXECUTIVE SUMMARY

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## EXECUTIVE SUMMARY

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### OVERVIEW

The Inspections and Evaluations Division (I&E) of the D.C. Office of the Inspector General (OIG) completed Part One of its inspection of the District of Columbia Department of Human Resources (DCHR) from December 2006 to April 2007. DCHR, formerly known as the D.C. Office of Personnel (DCOP), is the lead human resources (HR) provider for the District government. DCHR's stated mission is to provide comprehensive HR management services that strengthen individual and organizational performance and enable the government to attract, develop, and retain a highly qualified, diverse workforce. DCHR's services include recruitment, benefits administration, performance management, training, customer service, classification, and compensation.

The inspection objectives were to evaluate the overall sufficiency and quality of DCHR's policies, procedures, and internal controls regarding hiring and selection of new District government employees, and evaluate the quality of service delivery. The inspection team assessed core hiring activities such as the solicitation, processing, and evaluation of job applications, and attempted to determine if DCHR's online job application capability has improved the effectiveness of the hiring process.

The team conducted 93 interviews, reviewed many files and documents, issued anonymous and confidential surveys to agency HR Advisors and DCHR employees, and observed demonstrations of key work processes. A list of the report's 28 findings and 47 recommendations is at Appendix 1. The team also issued a Management Alert Report (MAR 07-I-009 at Appendix 2) regarding the exemption of District employees from engineering licensure requirements. DCHR reviewed the draft of this report prior to publication, and its comments are included in the report.

### Key Findings

***Internal controls are inadequate (Page 26).*** The team observed that DCHR lacks adequate policies and procedures, training requirements, and employee oversight, which are key internal controls.

***DCHR does not coordinate or facilitate drug testing on candidates and employees in youth services and other sensitive positions as required by law. Although DCHR coordinates background checks for agencies covered by the Child and Youth, Safety and Health Omnibus Amendment Act of 2004 (Act), it is not coordinating criminal background checks for agencies not covered by the Act (Page 32).*** D.C. Law 15-353, the Child and Youth, Safety and Health Omnibus Amendment Act of 2004 (Act) establishes (in part) requirements for "a mandatory drug and alcohol testing program for certain District of Columbia applicants and employees . . . [and] a criminal background check program for employees and unsupervised volunteers of certain providers that provide direct services to children or youth. . . ." DCHR is not coordinating drug testing mandated by law for occupations providing direct services to children and youths. In addition, its oversight and coordination of criminal background checks and drug testing do not extend to agencies not covered by the Act.

## EXECUTIVE SUMMARY

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***Inadequate advertising of vacancies and recruiting methods may result in fewer qualified applicants, particularly for specialized or technical positions (Page 36).*** DCHR limits advertising of most positions to its website. Employees indicated that advertising outside of the DCHR website is at the request of and funded by other District agencies, and that DCHR does not advise agencies on how they can advertise effectively to a larger audience. Inadequate or ineffective advertising may mean fewer qualified applicants and delays in hiring, particularly for specialized positions.

***The application of residency and veterans' preferences is inconsistent and sometimes impedes the hiring process (Page 38).*** Residency and veterans' preference candidates receive an advantage over other candidates during the rating and ranking stages of the hiring process, and when the agency is selecting a candidate listed on the DCHR selection certificate. A review of DCHR merit case files and interviews disclosed that DCHR does not consistently add residency preference and veterans' preference points to candidates' scores in accordance with the District Personnel Manual (DPM), and internal controls to monitor this process are not adequate.

***DCHR has not been reporting to agency heads the residency status of residency preference employees as required by the DPM (Page 43).*** According to the DPM, applicants who claim residency preference must maintain District residency for 5 consecutive years after being hired or forfeit their positions. DCHR initiates a residency verification process by generating listings, by agency, of employees subject to residency requirements and transmitting them to the appropriate agency head and the Office of Tax and Revenue (OTR). Agency heads obtain signed affidavits from employees verifying that they resided in the District during the previous year and OTR generates a report containing the mailing address employees listed on their tax return. DCHR managers stated that they have not complied with this reporting requirement because there is neither a responsible unit within DCHR nor a business process to collect residency data on affected employees. Because DCHR does not produce reports on employees subject to residency preference, there is no systematic process for determining if those employees have moved from the District before the prescribed time and are thus subject to termination.

***DCHR did not develop annual affirmative action plans as required by law (Page 45).*** DCHR management did not prepare annual affirmative action plans for 2005 through 2007 to be submitted to the Mayor and City Council in accordance with D.C. Code § 1-521.02 (Repl. 2006). The absence of a formal DCHR affirmative action plan potentially compromises the implementation of specific actions in recruitment, hiring, and other areas designed to eliminate the present effects of past discrimination, or to prevent discrimination.

***Positions requiring licenses are not always identified, and applicants' licenses are not always verified prior to their employment (Page 46).*** The DPM states that DCHR is responsible for identifying licensure requirements and adding them to the qualifications required of affected applicants. A review of vacancy announcements indicated that some did not list applicable licensure requirements. Interviewees stated that DCHR does not determine if positions require licensure prior to finalizing position descriptions or posting vacancy announcements, and there are no policies and procedures for such a determination. In addition, DCHR does not consistently verify that applicants have required licenses prior to employment.

## EXECUTIVE SUMMARY

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*DCHR is not adequately staffed to carry out all of its tasks effectively (Page 51).*

DCHR has not been able to fill its vacancies expeditiously and is not operating at an optimal staffing level. Between 2004 and 2006, DCHR lost approximately 75 employees, and at the start of this inspection, there were approximately 25 vacancies, representing 19 percent of its staffing complement. The team observed significant staffing deficiencies in the Records Division, Classification Division, and Management and Employment Services Administration.

### **Application and Selection Process**

The team observed a lack of adherence to hiring policies and procedures, problems with DCHR's online job application, and insufficient documentation in Official Personnel Folders (OPFs). The team found that:

- the online application does not require vital background information;
- some OPFs lack documentation of employment suitability;
- receipt of incomplete online applications may limit the pool of qualified applicants;
- internal controls for receiving and tracking applications are inadequate;
- monitoring of the ranking panel process is inconsistent; and
- policies and procedures maintaining merit case files are not followed.

### **Compensation and Classification**

The Compensation Division manages the District's salary schedules and reviews pay policies. The Classification Division works with agencies to determine position titles, occupational series, and pay grades based on positions' duties and responsibilities. It is also responsible for ensuring that positions are organized appropriately to support agencies' missions. During its assessment of these divisions, the team found that:

- the compensation and classification systems are outdated and contribute to recruitment problems;
- the classification process does not meet agencies' expectations for timeliness, and DCHR does not have performance measures for the timeliness of classification actions;
- DCHR sometimes classifies new positions at grades higher than appropriate;
- DCHR does not review positions routinely to ensure that they are properly classified; and
- DCHR's lack of policies for open-range pay scales<sup>1</sup> creates confusion for managers in implementation and opportunities for abuse.

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<sup>1</sup> Open-range pay scales have grades with minimum and maximum salaries and flexibility in setting employees' pay between these points.

## **EXECUTIVE SUMMARY**

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### **Records Management**

Chapter 31A of the DPM, “Records Management and Privacy of Records,” establishes controls for documenting and securing OPFs. During its assessment of records management, the team observed that:

- OPFs are not adequately tracked;
- OPFs are not transported in a secure manner; and
- there is a backlog of documents to file in OPFs.

### **RECOMMENDATIONS**

The OIG made 47 recommendations to DCHR to improve the deficiencies noted, establish and implement internal controls, and increase operational efficiency. Many recommendations focused on developing written policies and procedures, increasing employee training, improving managerial oversight, and increasing staffing.

### **COMPLIANCE AND FOLLOW-UP**

The OIG inspection process includes follow-up with DCHR on findings and recommendations. Compliance forms will be sent to DCHR along with this report of inspection. I&E will coordinate with DCHR on verifying compliance with recommendations over an established period. In some instances, follow-up inspection activities and additional reports may be required.

**INTRODUCTION**

# INTRODUCTION

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## INTRODUCTION

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### Background and Perspective

The Inspections and Evaluations (I&E) Division of the Office of the Inspector General (OIG) conducted an inspection of the District of Columbia Department of Human Resources (DCHR) from December 2006 to April 2007. The inspection objectives were to evaluate the overall sufficiency and quality of DCHR's policies, procedures, and internal controls regarding hiring and selection of new District government employees, and to evaluate the quality of service delivery. DCHR, formerly known as the D.C. Office of Personnel (DCOP), is the lead human resources (HR) provider for the District government. In March 2007, Mayor Adrian Fenty renamed the agency and appointed a new Director (D/DCHR). Shortly thereafter, the D/DCHR realigned agency components, and the agency is now configured into the Office of the Chief of Staff and five administrations: Information Technology, Benefits and Compensation, Policy and Planning, Workforce Recruiting, and Workforce Development.

DCHR's mission is to provide comprehensive HR management services that strengthen individual and organizational performance and enable the government to attract, develop, and retain a highly qualified, diverse workforce. According to the D/DCHR's testimony at a City Council oversight hearing on February 16, 2007 (page 2), "The office provides full service to 17,000 District employees under the authority of the Mayor. [DCHR] also provides HR Services to approximately 17,000 more District employees in independent and quasi-independent agencies and the D.C. Public Schools." According to a DCHR press release dated March 2, 2007, "DCHR recruits and hires an average of nearly 4,000 employees annually, processes more than 37,000 personnel actions and trains more than 6,000 employees annually through its Center for Workforce Development."

DCHR has approximately 100 full-time employees (FTEs) who are responsible for a broad range of HR management services. These services include recruitment, benefits administration, performance management, training, compensation and classification, and customer service. DCHR provides all of these services to most agencies under the Mayor's personnel authority. Independent agencies can identify and request the specific services they want to receive from DCHR.

### Scope and Methodology

OIG inspections comply with standards established by the President's Council on Integrity and Efficiency, and pay particular attention to the quality of internal control.<sup>2</sup>

This inspection evaluated the following core hiring activities for Career Service and Management Supervisory Service (MSS) positions: the solicitation, processing, and evaluation of job applications. The team also evaluated the classification process, records management,

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<sup>2</sup> "Internal control" is synonymous with "management control" and is defined by the Government Accountability Office as comprising "the plans, methods, and procedures used to meet missions, goals, and objectives and, in doing so, supports performance-based management. Internal control also serves as the first line of defense in safeguarding assets and preventing and detecting errors and fraud." STANDARDS FOR INTERNAL CONTROL IN THE FEDERAL GOVERNMENT, Introduction at 4 (Nov. 1999).

## INTRODUCTION

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and the effectiveness of DCHR's manual and Internet-based job application systems. The team reviewed best practices in public sector HR management, and assessed DCHR's compliance with legislative requirements and personnel regulations. The inspection evaluated the overall sufficiency and quality of policies, procedures, and internal control; operational effectiveness and accuracy; and the quality of service delivery.

The team conducted 93 interviews, reviewed many files and documents, issued anonymous and confidential surveys<sup>3</sup> to agency HR Advisors<sup>4</sup> and DCHR employees, and observed demonstrations of key work processes. A list of the report's 28 findings and 47 recommendations is at Appendix 1. The team also issued a Management Alert Report (MAR 07-I-009 at Appendix 2) regarding the exemption of District employees from engineering licensure requirements.

DCHR reviewed the draft of this report prior to publication, and its comments follow each OIG recommendation. Although not requested by the OIG, DCHR also inserted explanatory comments within some of the findings. The OIG included DCHR's comments in their entirety at the end of the finding. DCHR submitted 13 exhibits as part of its responses. Due to the quantity of information provided, the exhibits could not be published as part of the report. A list of the exhibits that DCHR provided can be found at Appendix 3. The OIG or DCHR can furnish the exhibits upon request.

**Note:** The OIG does not correct an agency's grammatical or spelling errors, but does format an agency's responses in order to maintain readability of OIG reports. Such formatting is limited to font size, type, and color, with the following exception: if an agency bolds or underlines text within its response, the OIG preserves these elements of format.

### Compliance and Follow-Up

The OIG inspection process includes follow-up with DCHR on findings and recommendations. Compliance forms will be sent to DCHR along with this report of inspection. The I&E Division will coordinate with DCHR on verifying compliance with recommendations over an established period. In some instances, follow-up inspection activities and additional reports may be required.

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<sup>3</sup> See Appendix 4 for complete survey results.

<sup>4</sup> HR Advisors within District agencies are liaisons between DCHR and agency managers.

**EMPLOYEE AND HR ADVISOR  
SURVEYS**

## EMPLOYEE AND HR ADVISOR SURVEYS

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## EMPLOYEE AND HR ADVISOR SURVEYS

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In March 2007, the team distributed anonymous and confidential written surveys to DCHR employees who play a role in the classification and hiring process and to agency HR Advisors. The surveys were designed to obtain their opinions and attitudes about DCHR's customer service and its hiring process. The response rate for both DCHR employees and HR Advisors was 74 percent.<sup>5,6</sup> A copy of both surveys can be found at Appendix 4.

The survey items consisted of statements such as, "I have a clear understanding of my duties and responsibilities." Employees selected from the following answer choices: Strongly Agree, Agree, Disagree, Strongly Disagree, and Not Applicable. DCHR employees and HR Advisors were instructed to mark "Not Applicable" if they did not have experience with or knowledge of an item. The following tables list the percent of Agree and Disagree responses, excluding Not Applicable responses and respondents who did not answer that item.<sup>7</sup> The Agree column of the survey table combines Agree and Strongly Agree answers, while the Disagree column combines Disagree and Strongly Disagree answers. The surveys were designed with five answer choices to provide detailed information to the team, but responses were condensed to two categories in the following tables to present a clear summary of the data.<sup>8</sup>

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<sup>5</sup> The inspection team distributed 65 surveys to DCHR employees and received 48 replies. The inspection team distributed 46 surveys to HR Advisors in agencies under the Mayor's personnel authority and received 34 surveys in response.

<sup>6</sup> Percentages have been rounded.

<sup>7</sup> The results that appear in Appendix 4 are presented differently from the results on pages 14 through 21. The results in Appendix 4 provide full results, including percentages for not applicable responses and no responses.

<sup>8</sup> Tables detailing Strongly Agree, Agree, Disagree, Strongly Disagree, and Not Applicable responses are in Appendix 4.

## EMPLOYEE AND HR ADVISOR SURVEYS

| <b>DCHR Employee Survey</b>  |              |                 |
|--|--------------|-----------------|
| <b>Statement</b>   | <b>Agree</b> | <b>Disagree</b> |
| 1. I have a clear understanding of my duties and responsibilities. <sup>9</sup>  | 92%          | 8%              |
| 2. There are written policies to cover all aspects of my duties and responsibilities.  | 61%          | 39%             |
| 3. There are standardized procedures for reviewing my work.  | 62%          | 38%             |
| 4. Assignments are fairly distributed and are manageable.  | 50%          | 50%             |
| 5. I receive annual performance evaluations.   | 90%          | 10%             |
| 6. DCOP <sup>10</sup> has published EEO policies in public places for employees to have ready access.                                  | 74%          | 26%             |
| 7. There is effective communication between HR Advisors and DCOP hiring staff.   | 75%          | 25%             |
| 8. Merit case files are well organized.  | 62%          | 38%             |
| 9. I receive Official Personnel Files soon after I request them.   | 63%          | 37%             |
| 10. DCOP adequately reviews position descriptions.   | 65%          | 35%             |
| 11. DCOP adequately reviews job codes for new position descriptions.   | 63%          | 37%             |
| 12. HR Advisors correctly select job codes for position descriptions.  | 41%          | 59%             |
| 13. Job announcements are posted online in a timely manner.  | 89%          | 11%             |
| 14. Customer service specialists ensure that merit case files contain all necessary documentation from walk-in and mail-in applicants. | 69%          | 31%             |
| 15. DCOP processes online/electronic applications in a timely manner.  | 85%          | 15%             |
| 16. DCOP processes paper/hard-copy applications in a timely manner.  | 81%          | 19%             |
| 17. There have been instances when DCOP has lost applicant paperwork.  | 78%          | 22%             |
| 18. DCOP consistently submits qualified applicants to hiring managers for review.  | 89%          | 11%             |
| 19. DCOP provides agency hiring officials with complete information to use when assessing applicants.                                  | 83%          | 17%             |
| 20. DCOP's online hiring process is at least as efficient as the paper-based process.  | 32%          | 68%             |

<sup>9</sup> Sixty percent of respondents strongly agreed with this statement, which was the only item on either survey with more than 50 percent of responses as Strongly Agree. No item on either survey had more than 50 percent of responses as Strongly Disagree.

<sup>10</sup> DCHR is listed as DCOP within the two surveys because the agency had not been renamed prior to the team distributing them.

## EMPLOYEE AND HR ADVISOR SURVEYS

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| <b>DCHR Employee Survey</b>   |              |                 |
|---|--------------|-----------------|
| <b>Statement</b>  | <b>Agree</b> | <b>Disagree</b> |
| 21. DCOP properly applies residency preference rules when screening applicants. | 79%          | 21%             |
| 22. DCOP verifies that reference checks were conducted.                         | 68%          | 32%             |
| 23. DCOP verifies that educational credentials were verified.                   | 71%          | 29%             |
| 24. DCOP verifies that prior work experience was verified.                      | 73%          | 27%             |

## EMPLOYEE AND HR ADVISOR SURVEYS

| <b>HR Advisor Survey</b>   |              |                 |
|--|--------------|-----------------|
| <b>Statement</b>   | <b>Agree</b> | <b>Disagree</b> |
| 1. I have a clear understanding of my Human Resource (HR) duties and responsibilities.                                   | 81%          | 19%             |
| 2. I have received adequate training to carry out my HR responsibilities.  | 67%          | 33%             |
| 3. There are written policies to cover key aspects of my duties and responsibilities.                                    | 80%          | 20%             |
| 4. There are standardized procedures for reviewing my work.  | 56%          | 44%             |
| 5. I receive annual performance evaluations on my HR duties.   | 79%          | 21%             |
| 6. There is effective communication with the DCOP hiring staff.  | 48%          | 52%             |
| 7. My overall experience with DCOP processing my new hires has been positive.  | 53%          | 47%             |
| 8. DCOP's hiring process is efficient.   | 31%          | 69%             |
| 9. DCOP's hiring staff provides complete and accurate information.   | 33%          | 67%             |
| 10. DCOP's website is a useful source for information.   | 83%          | 17%             |
| 11. DCOP completes the hiring process in a timely manner.  | 41%          | 59%             |
| 12. DCOP hiring staff quickly follows up on my problems and questions.   | 50%          | 50%             |
| 13. DCOP staff provides thorough answers to my questions.  | 48%          | 52%             |
| 14. DCOP treats District agencies fairly/equally.  | 57%          | 43%             |
| 15. I have received adequate training in creating new position descriptions.   | 35%          | 65%             |
| 16. I have received adequate training in selecting job codes.  | 44%          | 56%             |
| 17. Job codes are organized in a manner that allows me to easily identify the appropriate one for position descriptions. | 43%          | 57%             |
| 18. Job announcements are posted online in a timely manner.  | 70%          | 30%             |
| 19. DCOP vacancy announcements provide accurate and detailed descriptions of the vacancy.                                | 94%          | 6%              |
| 20. DCOP has developed special recruiting strategies for hard-to-fill positions within my agency.                        | 22%          | 78%             |
| 21. DCOP processes online/electronic applications in a timely manner.  | 45%          | 55%             |
| 22. DCOP processes paper/hard-copy applications in a timely manner.  | 37%          | 63%             |
| 23. There have been instances when DCOP has lost applicant paperwork.  | 77%          | 23%             |
| 24. DCOP submits unqualified applicants to hiring managers for review.   | 42%          | 58%             |

## EMPLOYEE AND HR ADVISOR SURVEYS

| <b>HR Advisor Survey</b>  |              |                 |
|---|--------------|-----------------|
| <b>Statement</b>  | <b>Agree</b> | <b>Disagree</b> |
| 25. DCOP's applicant screening process effectively identifies qualified candidates.                   | 30%          | 70%             |
| 26. DCOP provides agency hiring officials with complete information to use when assessing applicants. | 58%          | 42%             |
| 27. DCOP's online hiring process is at least as efficient as its paper-based process.                 | 44%          | 56%             |
| 28. DCOP maintains a register of displaced employees. <sup>11</sup>                                   | 92%          | 8%              |
| 29. I refer to a register of displaced employees when recruiting for job vacancies.                   | 38%          | 62%             |
| 30. DCOP properly applies residency preference rules when screening applicants.                       | 81%          | 19%             |
| 31. Reference checks for new hires are always conducted.  | 83%          | 17%             |
| 32. There are policies and procedures in place for conducting reference checks.                       | 78%          | 22%             |
| 33. I have received training on how to conduct reference checks.                                      | 19%          | 81%             |
| 34. Verification of educational credentials for new hires is always conducted.                        | 45%          | 55%             |
| 35. There are policies and procedures in place for verifying educational credentials.                 | 56%          | 44%             |
| 36. There are policies and procedures in place for verifying prior work experience.                   | 80%          | 20%             |
| 37. I have received training on how to verify prior work experience.                                  | 32%          | 68%             |
| 38. Verification of prior work experience for new hires is always conducted.                          | 77%          | 23%             |

<sup>11</sup> A register of displaced employees lists employees who were terminated during a reduction in force and who are eligible to receive priority in hiring.

## EMPLOYEE AND HR ADVISOR SURVEYS

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### Areas of Potential Concern

The survey items listed below had high percentages of negative responses that might indicate areas requiring management's attention. For these statements, a majority of respondents indicated that they disagreed with a particular issue.

#### **DCHR Employee Survey Items:**

4. Assignments are fairly distributed and are manageable (50 percent Disagree).
12. HR Advisors correctly select job codes for position descriptions (59 percent Disagree).
17. There have been instances when DCOP has lost applicant paperwork (78 percent Agree, indicating that DCOP has lost applicant paperwork).
20. DCOP's online hiring process is at least as efficient as the paper-based process (68 percent Disagree).

#### **HR Advisor Survey Items:**

6. There is effective communication with the DCOP hiring staff (52 percent Disagree).
8. DCOP's hiring process is efficient (69 percent Disagree).
9. DCOP's hiring staff provides complete and accurate information (67 percent Disagree).
11. DCOP completes the hiring process in a timely manner (59 percent Disagree).
12. DCOP hiring staff quickly follows up on my problems and questions (50 percent Disagree).
13. DCOP staff provides thorough answers to my questions (52 percent Disagree).
15. I have received adequate training in creating new position descriptions (65 percent Disagree).
16. I have received adequate training in selecting job codes (56 percent Disagree).
17. Job codes are organized in a manner that allows me to easily identify the appropriate one for position descriptions (57 percent Disagree).
20. DCOP has developed special recruiting strategies for hard-to-fill positions within my agency (78 percent Disagree).
21. DCOP processes online/electronic applications in a timely manner (55 percent Disagree).
22. DCOP processes paper/hard-copy applications in a timely manner (63 percent Disagree).
23. There have been instances when DCOP has lost applicant paperwork (77 percent Agree, indicating that DCOP has lost applicant paperwork).
25. DCOP's applicant screening process effectively identifies qualified candidates (70 percent Disagree).
27. DCOP's online hiring process is at least as efficient as its paper-based process (56 percent Disagree).
29. I refer to a register of displaced employees when recruiting for job vacancies (62 percent Disagree).
33. I have received training on how to conduct reference checks (81 percent Disagree).

## EMPLOYEE AND HR ADVISOR SURVEYS

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34. Verification of educational credentials for new hires is always conducted (55 percent Disagree).
37. I have received training on how to verify prior work experience (68 percent Disagree).

DCHR key results measures regarding customer service appear to be more positive than the results of the team's survey of HR Advisors. For the OIG survey item "My overall experience with DCOP processing my new hires has been positive," 53 percent of HR Advisors responded favorably. In contrast, DCHR documents indicate that for FY 2006, 73 percent of client agencies were satisfied with the DCHR Management and Employee Services Administration (MESA), and 90 percent of surveyed employees were satisfied with MESA.<sup>12</sup>

### Open-Ended Questions

Survey respondents had the opportunity to respond to open-ended questions. The following are some of the open-ended survey questions and summaries of written responses.

#### **DCHR Employee Survey**

The survey asked DCHR employees to identify areas within the agency that need improvement. The most common responses addressed the following:

- DCHR management should consider internally promoting employees instead of selecting external applicants to fill vacancies;
- DCHR should extend the career ladder and increase salary ranges for many of its positions;
- HR Specialists should not show bias when determining an applicant's suitability for a position; and
- DCHR needs to improve its online application system and allow for online rating and ranking of applicants.

When DCHR employees were asked whether they have adequate resources to do their jobs, 40 percent stated that they did not. Of those employees, many stated that they need additional staff; they lack simple supplies such as pens, pencils, and folders; it takes too long to receive supplies; or they purchase their own supplies.

When asked to identify their EEO Officer and EEO Counselor, only 4 percent of DCHR employees surveyed correctly stated that there is no EEO Officer. Eight percent correctly identified the EEO Counselor. Approximately 65 percent of survey respondents did not answer this question, stated that they did not know the answer, or stated that the question was not applicable to them. In addition, roughly 25 percent of respondents named DCHR employees who are not EEO representatives.

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<sup>12</sup> In response to the team's inquiries about the methodology of the survey, a DCHR official stated further information was not available because the employee who had conducted the survey was no longer with DCHR.

## EMPLOYEE AND HR ADVISOR SURVEYS

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Responses to the survey question, “Who conducts criminal background checks?” reflected multiple lines of responsibility for this function. Thirty-three percent of employees surveyed did not respond, potentially indicating a lack of knowledge.<sup>13</sup> Thirty-five percent stated that DCHR or the Metropolitan Police Department (MPD) conducts criminal background checks.<sup>14</sup> Thirty-one percent of respondents stated that individual agencies are responsible. DPM Bulletin No. 4-33 and DPM § 412 state that DCHR coordinates criminal background checks for employees working with children and youth in specific District agencies covered in the Child and Youth, Safety and Health Omnibus Amendment Act of 2004 (Act). District agencies not covered by the Act determine which of their positions are to undergo criminal background checks.

Finally, the team asked DCHR employees to identify HR training that they have received. Most respondents stated that they received training in basic writing skills, MS Word, customer service, or PeopleSoft.<sup>15</sup> Only 19 percent of respondents, however, noted that they have taken specialized HR training courses.

### HR Advisors Survey

In response to an open-ended question regarding areas in need of improvement, HR Advisors frequently indicated that hiring is not completed in a timely manner. Some noted that DCHR does not communicate well with agencies, and that rating and ranking applicants is sometimes untimely or inaccurate. HR Advisors also wrote that HR functions lack written policies and procedures, and DCHR has not provided sufficient HR training for HR Advisors in small agencies whose primary duties are not HR-related.

HR Advisors provided several different responses to the open-ended question regarding which agency conducts criminal background checks for applicants. Approximately 38 percent of survey respondents did not answer or stated that they were unaware of which agency conducts background checks. Approximately 27 percent answered that DCHR was responsible for ensuring that applicants receive background checks, and approximately 29 percent indicated that individual agencies are responsible. DCHR is responsible for coordinating criminal background checks for employees working with children and youth in specific District agencies covered by the Act. However, District agencies not covered by the Act determine which of their positions are subject to criminal background checks.

HR Advisors were asked to describe the HR training they received and to identify the source of that training, such as DCHR. The amount of HR training and experience appears to vary significantly among HR Advisors. Out of 31 respondents, 29 percent indicated that they had received HR-specific formal training from DCHR. In addition, 27 percent of respondents indicated that they had received PeopleSoft training.

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<sup>13</sup> Percentages have been rounded.

<sup>14</sup> Criminal background checks are conducted by DCHR’s Substance Abuse Program in conjunction with the Metropolitan Police Department (MPD).

<sup>15</sup> PeopleSoft is an automated database that DCHR uses to process and approve personnel actions and receive online job applications.

## EMPLOYEE AND HR ADVISOR SURVEYS

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HR Advisors were asked how DCHR's performance in hiring had affected their agencies. The 19 respondents who indicated problems reported that DCHR's performance had delayed hiring, overworked current employees, increased HR Advisors' workloads, and harmed agencies' operational effectiveness.

The survey asked HR Advisors to identify problems and concerns that DCHR's hiring staff should address. HR Advisors who reported problems indicated that DCHR staff does not communicate timely with agencies, particularly regarding problems; applicants are not evaluated accurately; and qualified applicants sometimes do not appear on selection certificates. Some respondents wrote that employee information is incorrect in PeopleSoft and is not corrected expeditiously, and that personnel rules are not applied consistently.

## EMPLOYEE AND HR ADVISOR SURVEYS

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**Findings and  
Recommendations:**

**KEY FINDINGS**

## KEY FINDINGS

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## KEY FINDINGS

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### Hiring Process Overview

The inspection evaluated DCHR's quality of service delivery and internal controls regarding the hiring process. District agencies and DCHR coordinate during this process, which can take several weeks to several months. The typical hiring process to fill Career Service and MSS positions includes classifying positions, reviewing and posting vacancy announcements, evaluating applicants, verifying credentials, and extending an employment offer.

After a District agency identifies a hiring need, the agency hiring manager and HR Advisor work with the DCHR Classification Division to approve a position description with a position title, occupational series, and pay grade. The Financial Officer for each agency reviews the position and verifies the availability of funding. The agency then submits a job requisition to a DCHR HR Specialist for approval. HR Specialists are DCHR employees responsible for staffing and recruiting on behalf of District agencies.

The HR Specialist posts the vacancy announcement to the DCHR website to begin soliciting applications.<sup>16</sup> DCHR assembles applications into a merit case file. A merit case file is an official record containing applications and documentation of hiring process activities for a vacancy announcement. After the closing date of the vacancy announcement, the HR Specialist determines which candidates meet the minimum qualification standards to be considered for the position. The HR Specialist and/or a ranking panel within the hiring agency<sup>17</sup> scores responses to ranking factor questions<sup>18</sup> from applicants who meet minimum qualifications for the position. Each applicant's rating score is converted to a categorical ranking.<sup>19</sup> Agencies are sent a selection certificate, which lists applicants in the highest categorical ranking, and their application materials. District residents and eligible veterans are given preference in the selection process.

The hiring agency selects a candidate from the selection certificate and informs DCHR of its decision. The hiring agency and DCHR are responsible for ensuring the selected candidate

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<sup>16</sup> HR Advisors within some District agencies also can post vacancy announcements on DCHR's website.

<sup>17</sup> Ranking panels are groups of subject matter experts from hiring agencies who evaluate candidates' qualifications and responses to ranking factors. HR Specialists monitor the ranking panel process and provide guidance to panel members.

<sup>18</sup> Section A-4 of DCHR's Merit Staffing Plan defines ranking factors as "a set of special qualifications criteria developed for a specific position, which are in addition to the minimum qualifications and which are used to arrive at the categorical ranking of applicants for a specific position." DPM Chapter 8, Part II, Appendix A.

<sup>19</sup> According to § A.11.F.3. of DCHR's Merit Staffing Plan:

categorical rankings provide more meaningful distinctions in expected work performance and are defined as follows: a. **Highly qualified.** These are candidates whose qualifications and examination scores indicate the capability for outstanding work performance in a given position (90 and above); b. **Well qualified.** These are candidates whose qualifications and examination scores indicate the capability for more than acceptable work performance in a given position (80-89); c. **Qualified.** These are candidates whose qualifications and examination scores indicate the capability for acceptable work performance in a given position (70-79); and d. **Ineligible.** These are candidates whose qualifications and examination scores do not indicate the capability for acceptable work performance in a given position....

## KEY FINDINGS

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undergoes applicable drug testing, criminal background checks, driving records checks, reference checks, employment verification, and/or education verification before or shortly after being hired.

DCHR extends an employment offer to the selected candidate and schedules a start date if the candidate accepts. The new employee attends orientation at DCHR, completes a series of forms, and obtains an identification card. DCHR compiles the new employee's hiring-related documents into an OPF, which will contain permanent records relating to the employee's status. This information is also entered into an automated database and the new employee is officially registered as a District government employee. A detailed flow chart of the DCHR hiring process can be found at Appendix 5.

### **1. Internal controls are inadequate.**

The Government Accountability Office (GAO) report entitled *Internal Control Management and Evaluation Tool* (GAO-01-1008G, August 2001) contains standards that assist federal agencies in maintaining and implementing internal controls, such as policies and procedures, and training and counseling programs. The team observed that DCHR lacks adequate policies and procedures, employee oversight, and training, which are key internal controls.

- a. A number of policies and procedures need updating and revision to improve their accuracy and usefulness.*

The GAO recommends that:

- 1. Appropriate policies, procedures, techniques, and mechanisms exist with respect to each of the agency's activities.**  

• • •
- 2. The control activities identified as necessary are in place and being applied. Consider the following:**
  - Control activities described in policy and procedures manuals are actually applied and applied properly.

• • •
- 3. Control activities are regularly evaluated to ensure that they are still appropriate and working as intended.<sup>20</sup>**

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<sup>20</sup> *Id.* at 34 (footnote omitted).

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Interviewees indicated that they use the DPM as their primary source of guidance when performing HR duties and responsibilities. While the DPM contains regulations that govern DCHR, it does not fully detail how to perform some HR functions. For example, the team learned that there are no written procedures for monitoring agency ranking panels, transporting OPFs, and identifying positions requiring licensure. The team also observed that while Part II of the DPM contains implementing guidelines, certain sections have not been updated and are not fully reflective of current business processes.<sup>21</sup> For example, the DPM contains a Merit Staffing Plan that provides detailed instructions for executing the hiring process for Career Service positions.<sup>22</sup> These guidelines, however, contain clauses that are no longer implemented and exclude procedures for handling applications that are submitted online. In addition to the lack of procedures for some areas, DCHR has not codified the DPM into the D.C. Municipal Regulations (DCMR).<sup>23</sup>

HR Advisors reported that DCHR provides inconsistent guidance when responding to questions and interpreting HR regulations. When HR Advisors responded to the survey statement, “DCHR staff provides thorough answers to my questions,” 52 percent of respondents disagreed. DCHR employees stated that when written guidance on the proper interpretation and application of HR regulations is not available, employees might use their discretion and interpret HR regulations incorrectly or in a manner that creates opportunities for abuse.

The lack of standard operating procedures, codification of the DPM into the DCMR, and current implementing guidance limits DCHR’s ability to ensure that employees follow the same standards and make consistent decisions throughout the hiring process. Consequently, if DCHR does not establish guidelines identifying how to perform tasks, employees cannot be held fully accountable for carrying them out incorrectly.

### ***DCHR’s Response, as Received:***

*Agree in part. The Policy and Planning Administration (PPA), DCHR, has been continuously updating and revising personnel regulations, policies and procedures to ensure compliance with personnel regulations. (See Exhibit 1)[<sup>24</sup>]*

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<sup>21</sup> Part I of each chapter of the DPM establishes HR regulations, while Part II contains implementing guidelines that further interpret the regulations.

<sup>22</sup> See DPM, Chapter 8, Part II, Appendix A.

<sup>23</sup> “The District of Columbia Municipal Regulations, certified and published by the D.C. Office of Documents and Administrative Issuances, is the official compilation of the permanent rules and statements of general applicability and legal effect promulgated by executive agencies and departments, the Council of the District of Columbia, and by independent entities of the government of the District of Columbia.”

[http://www.amlegal.com/nxt/gateway.dll/Title%201/chapter00003.htm?f=templates\\$fn=main-nf.htm\\$3.0#JD\\_Foreward](http://www.amlegal.com/nxt/gateway.dll/Title%201/chapter00003.htm?f=templates$fn=main-nf.htm$3.0#JD_Foreward). (last visited Sept. 14, 2007).

<sup>24</sup> Exhibits referenced in DCHR’s responses are not included as part of this report. However, Appendix 3 includes a table of contents listing the exhibits that DCHR submitted.

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*b. Job-specific training for HR Specialists and HR Advisors is inadequate.*

The GAO Internal Control Management and Evaluation Tool includes best practices for increasing employee competence.<sup>25</sup> It recommends that:

**The agency [provide] training and counseling in order to help employees maintain and improve their competence for their jobs. Consider the following:**

- There is an appropriate training program to meet the needs of all employees.
- The agency emphasizes the need for continuing training and has a control mechanism to help ensure that all employees actually received appropriate training.

DCHR management does not ensure that HR Specialists receive HR-based training. During interviews and survey analysis, the team learned that few HR Specialists had taken HR-related courses while employed with DCHR. Employees received informal on-the-job training, and many have taken PeopleSoft, Basic Writing Skills, and Customer Service courses. While these courses are relevant to some specific responsibilities, they do not enhance employees' HR knowledge. The team surveyed 48 DCHR employees involved in the hiring process and only 9 stated that they had received HR-specific training. When describing DCHR employees' capabilities, a former manager stated that at the beginning of the former D/DCHR's tenure in 2004, they "found a team of hard-working yet under-trained and inadequately prepared employees . . . . Many of the managers had very little personnel experience or education and most were not HR certified."<sup>26</sup> This manager added that, "The primary problem with the DCOP hiring process is that we do not have enough qualified people handling the critical HR functions."

According to interviews with DCHR employees and HR Advisor surveys, some HR Advisors lack adequate training. In response to the survey item "I have received adequate training to carry out my HR responsibilities," 32 percent of HR Advisors disagreed. HR Advisor surveys also indicated that employees whose HR Advisor duties were a small part of their jobs were more likely to feel that they were inadequately trained for their HR responsibilities. Small agencies are more likely to have employees serving as HR Advisors as an additional duty outside the scope of their positions.

Some HR Advisors wrote that DCHR's HR training is not adequately informative and is not flexible enough to accommodate the schedules of HR Advisors whose main responsibilities are not HR-related. HR Advisors who are inadequately trained may not be aware of or follow

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<sup>25</sup> Government Accountability Office, Internal Control Management and Evaluation Tool, GAO-01-1008G (Aug. 2001) at 12.

<sup>26</sup> According to the Society for Human Resource Management, "[c]ertification is a voluntary action by a professional group to establish a system to grant recognition to professionals who have met a stated level of training and work experience." [Http://www.hrci.org/Certification/OV/](http://www.hrci.org/Certification/OV/) (last visited Aug. 8, 2007).

## KEY FINDINGS

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HR policies and procedures.

In contrast to DCHR's lack of training, several District agencies have implemented training requirements and programs to ensure that employees possess consistent skill levels and knowledge. For example, the Office of Contracting and Procurement implemented a competency-based training program that required employees with contracting responsibilities to complete courses in core contracting areas within established timeframes. Similarly, auditors within the Office of the D.C. Auditor complete at least 40 hours of continuing professional education (CPE) annually and the OIG follows federal auditing standards requiring 80 hours of CPE every 2 years to enhance their proficiency to perform audits. The implementation of training requirements within DCHR would develop employees' expertise and promote consistency in how assignments are carried out.

### ***DCHR's Response, as Received:***

*Agree. This was the case at the time of the Audit. Subsequently, the DCHR, Workforce Development Administration, has expanded its curriculum to provide more HR classes for HR Specialists and agency HR Advisors to ensure that they understand the terms and functions of the District government's HR management system. The curriculum includes several computer and web-based training modules. In addition, the DCHR has approved more certification training courses for its HR Specialists with organizations such as the Society for Human Resources Management (SHRM) and the United States Department of Agriculture (USDA), Graduate School. Several HR Specialists have already attended training in a variety of topics over the past fiscal year.*

### ***c. DCHR does not adequately oversee the work of HR Specialists.***

GAO best practices recommend that:

#### **Employees are provided a proper amount of supervision. Consider the following:**

- Employees receive guidance, review, and on-the-job training from supervisors to help ensure proper work flow and processing of transactions and events, reduce misunderstandings, and discourage wrongful acts.”<sup>27</sup>

HR Specialists stated that they work relatively autonomously and managers do not review their work periodically to ensure accuracy. The lack of HR Specialist supervision limits DCHR's oversight of the hiring process. Interviewees stated that when they have questions, they ask their colleagues or team leaders for assistance. Informal guidance from peers, however, does not necessarily provide accurate and consistent information.

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<sup>27</sup> Government Accountability Office, Internal Control Management and Evaluation Tool, GAO-01-1008G (Aug. 2001) at 19.

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An example of DCHR's lack of oversight of HR Specialists was observed during the team's review of merit case files. Merit case files are official records that document the steps taken to fill a vacancy. HR Specialists must thoroughly document these steps, and DCHR reviewing officials are responsible for verifying that documentation such as employment applications and rating and ranking information is contained in the files. DCHR generated a checklist for HR Specialists and reviewing officials to complete prior to storing merit case files. The team observed that this checklist usually was not included in merit case files or was not completed or signed by the HR Specialist and reviewing official. Possibly as a result of these missing or unsigned checklists, many merit case files were disorganized and did not contain the documentation required by the checklist.<sup>28</sup>

DCHR's inadequate oversight, training, policies, and procedures hinder consistency among employees when performing their duties.

### ***DCHR's Response, as Received:***

*Disagree. The PPA, DCHR, has been and will continue to revise and update the District Personnel Manual (DPM) and create written standard operating procedures to assist DCHR employees in performing their duties and responsibilities. A list of recent issuances, administrative orders, and notices of proposed and final rulemaking on a variety of topics is attached. (See Exhibit 1)*

**OIG Response: The OIG stands by its finding as stated. The team observed outdated policies and procedures in certain areas and DCHR employees stated that there are not written guidelines for certain job functions.**

### **Recommendations:**

- (1) That the D/DCHR comprehensively update the DPM and create written standard operating procedures to guide DCHR employees' duties and responsibilities.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ **X** \_\_\_\_\_

### ***DCHR's Response, as Received:***

*The PPA, DCHR, has been and will continue to revise and update the District Personnel Manual (DPM) and create written standard operating procedures to assist DCHR employees in performing their duties and responsibilities. A list of recent issuances, administrative orders, and notices of proposed and final rulemaking on a variety of topics is attached. (See Exhibit 1)*

**OIG Response: The OIG stands by its recommendation as stated. The team observed outdated policies and procedures in certain areas and DCHR employees stated that there are not written guidelines for some job functions. DCHR's response appears to meet the intent of this recommendation.**

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<sup>28</sup> Finding 14 of this report identifies additional deficiencies concerning merit case files.





## KEY FINDINGS

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background checks for the above agencies in accordance with the Act, and provides the results to the Unit. The Unit then informs the hiring agency of the results of these checks. However, DCHR has not developed drug-testing and reporting policies for affected agencies as mandated by the Act and in accordance with DPM § 3901.5 (*Mandatory Drug and Alcohol Testing for Safety-Sensitive Positions—General*). Consequently, the Unit is not coordinating with agencies on drug testing, and according to Unit employees, agencies that should be conducting drug testing are not doing so.

***b. DCHR oversight and coordination of criminal background checks and drug testing for employees in sensitive positions<sup>31</sup> do not extend to all agencies not covered by the Act.***

DPM § 403.5 states “The Mayor may delegate his or her personnel authority, in whole or in part, to subordinate agency heads to conduct suitability investigations and take suitability action against employees as described in this chapter.” In addition, DPM § 405.3 states:

Based on the duties of the position, or if required by law or regulation, each personnel authority shall determine which positions, in addition to being subject to pre-employment inquiries pursuant to section 405.2 of this section, shall be subject to background investigations, and mandatory criminal background checks. The vacancy announcements for such positions, and for positions described in section 406 of this chapter, shall include a statement informing applicants of the background investigation requirement. The Director, D.C. Office of Personnel (or his or her designee), shall publish in the District Personnel Manual (or any other procedural manual or manuals developed) positions in subordinate agencies subject to background investigations pursuant to this subsection, section 406 of this chapter, or any other law or regulation, as applicable.

Several District agencies not covered by the Act but with employees in sensitive positions have been delegated the authority to conduct criminal background checks and drug testing through the provisions of DPM § 403, *General Provisions on Suitability*. Those agencies subordinate to the Mayor that have been delegated this authority shall “provide the Director, D.C. Office of Personnel (or his or her designee), information to document the results of each suitability investigation conducted by the subordinate agency. Unless otherwise specified, the information shall be provided prior to the effective date of appointment of a selectee or appointee.”<sup>32</sup>

District agencies not covered by the Act subject applicants and employees to criminal background checks and drug testing because the agencies work with children and youth, law

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<sup>31</sup> The team uses the term “sensitive positions” to include those working with children and youth, in law enforcement, and with financial information.

<sup>32</sup> DPM § 408.2.

## KEY FINDINGS

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enforcement, financial, or other sensitive areas. For example, the Office of the Attorney General (OAG) has employees with protective services responsibilities for children and youth, but OAG employees are not included specifically in the Act. Similarly, the OIG, which deals with sensitive personnel and criminal matters, independently performs drug testing and National Crime Information Center (NCIC) background checks on its employees.<sup>33</sup> However, a DCHR official stated that the results from these checks are maintained within the agencies and are not sent to DCHR for its applicant review process or inclusion in employee OPFs. Consequently, DCHR may not be informed of the suitability or unsuitability of applicants or employees for sensitive positions as cited above.

DCHR's written policies or procedures for implementing the provisions of the DPM regarding criminal background checks are limited to agencies covered by the Act and information technology positions. In addition, DCHR does not have written policies and procedures for drug testing for agencies not covered by the Act. A DCHR manager opined that the District needs a comprehensive policy that mandates DCHR coordination with all affected District agencies on applicants and employees who should undergo drug testing and criminal background checks, whether or not they are covered by the Act.

### **Recommendations:**

- (1) That the D/DCHR ensure that the Substance Abuse Unit coordinates with District agencies on conducting drug and alcohol testing for employees who are child or youth services providers as required by D.C. Law 15-353, the Child and Youth, Safety and Health Omnibus Amendment Act of 2004.

Agree \_\_\_\_\_ **X** \_\_\_\_\_ Disagree \_\_\_\_\_

### ***DCHR's Response, as Received:***

*The DCHR has staff dedicated to this task.*

- (2) That the D/DCHR coordinate with the Executive Office of the Mayor to confirm that DCHR has the authority to require that agencies under the Mayor's personnel authority, which are not covered by the Act, contract with a vendor to perform drug testing for sensitive positions and notify DCHR of the results.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ **X** \_\_\_\_\_

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<sup>33</sup> The following District law enforcement agencies are authorized to utilize the NCIC database to perform employee criminal background checks: OIG, MPD, and the Fire and Emergency Medical Services Department Fire Investigation Unit.

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### ***DCHR's Response, as Received:***

*The DCHR is clear that currently drug and alcohol testing in the District government is limited to agencies that either by statute, regulation, or written policy, have the authority to conduct such testing.*

**OIG Response: The OIG stands by its recommendation as stated. The team observed that DCHR did not consult with District agencies, which are not covered by the Act, to ensure or confirm that employees working in sensitive positions have undergone drug screening.**

- (3) That the D/DCHR develop and promulgate comprehensive written policies and procedures regarding the conduct of criminal background checks and drug testing for agencies under the Mayor's personnel authority, which are not covered by the Act.

Agree \_\_\_\_\_ Disagree **X (in part)** \_\_\_\_\_

### ***DCHR's Response, as Received:***

*The DCHR has adopted regulations to implement the criminal background check provisions of D.C. Law 15-353 (Chapter 4 of the D.C. personnel regulations, Organization for Personnel Management). In addition to the regulations, the DCHR has procedures in place for the criminal background checks requirements. The Drug and Alcohol Testing Coordinator within the Policy and Planning Administration is charged with developing a protocol for testing. The DCHR expects to complete this protocol by March 2007. [On May 12, 2008, DCHR informed the OIG that the protocol will be completed by June 2008.]*

**OIG Response: The OIG stands by its recommendation as stated. DCHR's response appears to meet the intent of this recommendation.**

- (4) That the D/DCHR ensure that verification of applicant and employee background checks and drug testing is maintained in DCHR records<sup>34</sup> for review and retrieval.

Agree **X** \_\_\_\_\_ Disagree \_\_\_\_\_

### ***DCHR's Response, as Received:***

*As stated in response to question 2 (b)(3) [DCHR response to finding 2, recommendation 3], the DCHR has established procedures to comply with the criminal checks requirements.*

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<sup>34</sup> DPM § 3910.1 requires that drug and alcohol test results must be kept separately from employee official personnel folders.

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### **3. Inadequate advertising of vacancies and recruiting methods may result in fewer qualified applicants, particularly for specialized or technical positions.**

DCHR's website states that its mission includes "enabl[ing] the District government to attract . . . a well-qualified, diverse workforce."<sup>35</sup>

A DCHR memorandum dated March 27, 2007, indicates that DCHR does not have policies regarding when to advertise positions outside of its website. DPM regulations do not have recruitment instructions, although, section A.9.D of the Merit Staffing Plan, which is an addendum to the DPM, states, "All positions announced as 'Open Until Filled' are to be advertised in the local newspapers, e.g., Washington Post, Afro American . . . ." DCHR employees indicated that "Open Until Filled" positions are usually hard-to-fill positions. However, DCHR staff stated that this section of the plan is no longer applicable and pre-dates the development of the DCHR vacancy announcement website.

DCHR has not taken an active role in advertising most positions beyond posting them on its website. Interviews with DCHR employees and HR Advisor survey responses indicated that DCHR has not implemented recruiting strategies for hard-to-fill positions. Some agency HR Advisors wrote on their surveys that DCHR should increase its recruiting to attract a greater number of qualified applicants. DCHR employees noted that advertising outside of the DCHR website is done at the request of District agencies, which must fund such advertising. In addition, DCHR has not issued guidance to District agencies on when and how to advertise in public media. However, DCHR held three job fairs for District agencies from 2005 through 2007, and attended several others. Although recruiting is limited for most positions, DCHR actively recruits applicants for agency director positions.

There are other avenues DCHR could pursue to increase the number of qualified applicants. A review of the University of the District of Columbia's career website for students, alumni, and community members identified the Public Service Commission as the only District agency using this website, which posts vacancy announcements free of charge. One interviewee suggested that DCHR engage in public relations to market the advantages of working for the District government. The Montgomery County, Maryland website is an example of a marketing campaign for public service career opportunities. The site states that Montgomery County provides "your choice of career opportunities, great benefits, an environment that welcomes and values diversity, and a work experience that is both challenging and rewarding!"<sup>36</sup>

Inadequate recruiting leads to fewer qualified applicants because larger applicant pools contain greater numbers of highly qualified applicants, particularly for specialized and technical positions or those requiring licenses. A file review of 20 merit case files for positions requiring licensure and professional engineering positions revealed that 4 vacancy announcements were cancelled due to applicants not meeting minimum qualifications. Employees stated that DCHR was not tracking the number of cancelled vacancy announcements or the number of applications

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<sup>35</sup> [http://www.dchr.dc.gov/dcop/cwp/view,a,3,q,528755,dcopNav\\_GID,1517,dcopNav,31663,dcopNav,31798,asp](http://www.dchr.dc.gov/dcop/cwp/view,a,3,q,528755,dcopNav_GID,1517,dcopNav,31663,dcopNav,31798,asp) (last visited Aug. 8, 2007).

<sup>36</sup> <http://www.montgomerycountymd.gov/content/ohr/career/> (last visited Aug. 2, 2007).

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to evaluate the success of its recruiting efforts. Having to cancel and repost vacancy announcements due to a lack of qualified applicants creates delays in the hiring process.

### Recommendations:

- (1) That the D/DCHR develop and implement written policies and procedures to expand recruiting strategies.

Agree \_\_\_\_\_ **X** \_\_\_\_\_ Disagree \_\_\_\_\_

### *DCHR's Response, as Received:*

*The WRA, DCHR, recognizes that its recruitment efforts have to expand beyond its own Website in order to attract the best and brightest talent to the District government. To this end, during fiscal year 2007, the WRA is directing agencies under the personnel authority of the Mayor to provide information on their personnel needs so that the WRA could develop recruitment plans for each agency. Recruitment plans will assist the WRA in prioritizing its recruitment efforts and determining the types of venues to be used to recruit for technical, administrative, and hard-to-fill positions. The agencies provided the names of professional organizations, publications and alternate websites that the DCHR can use in its recruitment efforts. The recruitment plans formed the basis of the recruitment efforts for fiscal year 2008. The DCHR will continue to work with agencies, professional organizations, and professional recruiters to attract well qualified applicants to apply for positions with the District government. (See Exhibit 2)*

- (2) That the D/DCHR provide written advice to District agencies on recruitment options.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ **X** \_\_\_\_\_

### *DCHR's Response, as Received:*

*The DCHR has employed several methods in which an agency can receive information regarding recruitment options. For example, each agency is assigned to a "Cluster" that services all of its recruitment needs to include guidance regarding recruitment options.*

**OIG response: The OIG stands by its recommendation. Issuing written guidance to agencies would allow them to proceed with recruitment efforts rather than relying on DCHR to respond to their questions regarding recruitment. As noted on page 16 of this report, 50 percent of HR Advisors who responded to the survey disagreed with the statement, "DCOP hiring staff quickly follows up on my problems and questions." In addition, 52 percent of HR Advisors who responded to the survey disagreed with the statement, "DCOP staff provides thorough answers to my questions."**

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- (3) That the D/DCHR establish and track performance measures for recruiting.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ **X**

***DCHR's Response, as Received:***

*There are performance measures in the budget and this can be tracked in PeopleSoft.*

OIG response: **The OIG stands by its recommendation. DCHR employees stated that DCHR does not track the number of cancelled vacancy announcements or the number of applications received to evaluate its recruiting efforts. Further, DCHR performance measures are not specific to these recruitment issues.**

**4. The application of residency and veterans' preferences is inconsistent and sometimes impedes the hiring process.**

Residency preference applicants receive an advantage during the rating and ranking stage and when an agency is selecting an applicant to hire from the DCHR selection certificate. Applicants meeting minimum qualification standards who indicate on their applications that they claim residency preference receive five additional points during ranking. Applicants claiming veterans' preference also receive additional points during ranking. HR Specialists or agency ranking panels score applicants' responses to ranking factors. Applicants' scores, including all applicable preference points, are used to determine their categorical ranking. Applicants in the highest categorical rankings appear on a selection certificate. Agency hiring managers choose whether to interview applicants listed on the selection certificate, but if they interview one applicant, they must interview all applicants. When agency hiring managers select an applicant from the selection certificate, they cannot hire a non-residency preference applicant over a residency preference applicant.

D.C. Code § 1-608.01(e)(1) (Repl. 2006) states in part, "[A]n applicant for District government employment in the Career Service who is a bona fide resident of the District at the time of application shall be given a hiring preference over a non-resident applicant." DPM § 301.8 states in part, "[R]esidency preference shall be given by adding five (5) points to the rating and ranking score of each qualified applicant claiming or entitled to residency preference." According to DPM § 301.10:

To fill a position in the Career Service or the Management Supervisory Service where two (2) or more applicants are equally qualified, the applicant with residency preference shall be listed and selected ahead of the non-preference candidate, with the determination as to equal qualifications made as follows:

(a) For an unassembled examining procedure, all applicants with the same categorical ranking; and

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(b) For an assembled examining procedure, all applicants with the same numerical rating.<sup>37</sup>

DPM § 703.4(a) states that applicants claiming veterans' preference shall receive additional points as follows: "(1) An eligible veteran or a Vietnam veteran: 5 points; or (2) A disabled veteran, disabled Vietnam veteran, 30% disabled veteran, eligible spouse, or eligible survivor: 10 points."

*a. Agencies indicate that residency preference requirements sometimes impede hiring qualified applicants.*

Agency hiring managers and some HR Specialists report that residency preference regulations hinder agencies' ability to select the best qualified applicants. Currently, DCHR enforces residency preference as written in DPM Chapter 3, Residency, Subpart 3.4.B, which states, "**There are no provisions for a waiver.** A non-preference candidate **shall not** be selected when there is a residency preference (RP) candidate on the selection certificate." (Emphasis in the original.) However, HR Specialists stated that agencies sometimes submit written requests to the D/DCHR for waivers of residency preference requirements to hire non-residency preference applicants on selection certificates who are deemed more qualified than residency preference applicants. Interviewees indicated that these waivers are usually denied, but have been granted on limited occasions if agencies show that residency preference applicants are not qualified. DCHR does not have written policies and procedures governing waivers although it grants them in contradiction to the DPM.

Agencies typically cannot interview applicants until after DCHR puts their names on selection certificates.<sup>38</sup> Consequently, when the hiring agency receives a selection certificate with the names of a residency preference applicant (resident) and a non-residency preference applicant (non-resident), it has the following options with the following results:

1. Interview both applicants:

- (a) if the results of the interviews point to the resident as the best selection, select the resident;
- (b) if the results of the interviews point to the non-resident as the best selection, the resident still must be selected; or
- (c) the agency can interview and reject both applicants, return the selection certificate to DCHR, and start the hiring process over.

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<sup>37</sup>Unassembled examining procedures score applicants on their responses to rating and ranking factors and then convert their scores to categorical rankings, such as "well-qualified." Assembled examining procedures consist of written tests. Most positions use unassembled examining procedures; however, public safety positions, such as firefighters, use assembled examining procedures.

<sup>38</sup>Although candidates are usually only interviewed after a selection certificate is generated, some HR Specialists report that agencies are allowed to interview candidates as part of the ranking panel process prior to the establishment of a selection certificate. However, a DCHR manager stated that the latter procedure is not permitted. There is no written policy or regulation stating whether interviews are permitted during ranking panels. See Finding 13 of this report regarding ranking panels.

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2. Do not interview either applicant, and select the resident.
3. Reject both applicants without interviewing them, return the selection certificate to DCHR, and start the hiring process over.

If there are multiple names of residency preference applicants and non-residency preference applicants on the selection certificate, the options and results are the same: interview all of the applicants or none of the applicants, then select a resident or reject all applicants and start the hiring process over.

Agency managers stated that this process often prevents them from hiring the best qualified applicant after a thorough assessment that should include both the written applicant package and a face-to-face interview conducted by the hiring agency. In addition, canceling and reposting vacancy announcements delays the hiring process and affects agency productivity. Interviewees indicated that the residency preference process as now applied has the greatest negative impact on filling specialized technical and professional positions because these positions tend to attract fewer qualified applicants.

### ***DCHR's Response, as Received:***

***Disagree.** The residency preference provisions continue to be problematic and even controversial and are sometimes misunderstood both by the DCHR HR Specialists and agency officials. The key issue has been the misapplication of the residency preference points. As a rule, the residency preference is to be applied to the rating score (as somewhat of a tie breaker) when, after rating the applications, one determines that there is no substantial difference in qualifications between the applicant who has claimed residency preference and the non-resident applicant, or the applicant who is a resident but does not claim a preference. In those cases, all things being equal, the person who claims the residency preference should be selected over the non-resident. The residency preference should not be used to increase the rating of an otherwise less qualified applicant.*

**OIG Response: The OIG stands by its finding as stated based on D.C. Code and DPM requirements for residency preference. The DPM requires awarding additional points to residents' rating and ranking scores as well as giving them preference on selection certificates.<sup>39</sup>**

### ***b. DCHR does not consistently apply points for residency and veterans' preferences.***

Interviews and a review of DCHR merit case files disclosed that DCHR does not consistently apply residency and veterans' preference in accordance with the DPM. Some HR

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<sup>39</sup> The team evaluated DCHR's compliance with residency requirements at the time of inspection. Since that time, the District passed new legislation regarding residency preference requirements. On February 6, 2008, D.C. Law 17-108, the "Jobs for D.C. Residents Amendment Act of 2007," became effective. As a result of this act, D.C. Code § 1-607.09 (a) states that residents shall receive 10 points in addition to their scores on a 100-point ranking scale.

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Specialists do not add residency preference and veterans' preference points to rating and ranking scores prior to determining applicants' categorical rankings. For example, an applicant who claims residency preference may have an initial rating and ranking score of 89 and a categorical ranking of well-qualified. If residency preference is properly applied, the applicant will have a final rating and ranking score of 94 and a categorical ranking of highly qualified. If residency preference points are not added, the applicant will be considered only to be well-qualified in the hiring process.

Out of 79 files reviewed, the team was able to evaluate the application of residency preference in only 3 cases. Thirty-eight files could not be assessed for accurate application of residency preference because the files did not contain adequate documentation. Residency preference was not applicable in the remaining 38 cases, usually because the positions were restricted to agency employees and received only 1 applicant who met minimum qualification standards.

File reviews and interviews revealed that not all HR Specialists add veterans' and residency preference points to applicants' scores prior to determining their categorical ranking. Of the three cases that the team was able to assess, residency preference was incorrectly applied in two cases. In both cases, residency preference applicants were not awarded five additional points to their rating and ranking scores prior to determining their categorical ranking. In one of these cases, an applicant received residency preference on the selection certificate after indicating in one area of his application that he was not claiming residency preference while stating elsewhere in his application that he was claiming residency preference. This applicant was ultimately selected for the position. One case had a note from an HR Specialist to the hiring agency stating that residency preference applicants should not have points added to their scores, in contradiction to residency preference requirements. In the three cases reviewed, residency preference applicants received preference on selection certificates over other applicants with the same categorical ranking in accordance with the DPM.

Out of the three files reviewed, the OPFs of two residency preference applicants could not be located to determine if they contained documentation showing that DCHR had confirmed District residency. The OPF of the applicant who was awarded residency preference, but who had contradictory information about whether he was claiming it, did not have documentation of residency verification.

Out of the 79 files reviewed, veterans' preference was incorrectly applied in the one case that the team was able to assess for this area. In this case, veterans' preference applicants did not have additional points added to their rating and ranking scores prior to determining their categorical rankings.

DCHR does not have adequate internal controls to ensure that residency and veterans' preferences are appropriately applied. Some HR Specialists and one DCHR manager stated that it is DCHR's policy to not add residency or veterans' preference points. However, DPM guidance regarding granting residency and veterans' preference points remains in effect, and the D/DCHR testified to the City Council on June 4, 2007, that DCHR grants five points to residency preference applicants.

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Improper application of veterans' preference and residency preference affects the outcome of the hiring process. In reviewing files, the team observed applicants who were not awarded preference points and therefore did not qualify to be placed on selection certificates, when proper application of residency or veterans' preference would have increased their categorical rankings and consequently placed them on the selection certificates.

### **Recommendations:**

- (1) That the D/DCHR consider revising personnel requirements to permit agencies to interview candidates as part of the ranking process before they appear on the selection certificate.

Agree \_\_\_\_\_ **X** \_\_\_\_\_ Disagree \_\_\_\_\_

### ***DCHR's Response, as Received:***

*The DCHR is reviewing various rating and ranking processes based on surrounding jurisdictions and considering including the interview as part of the ranking process.*

- (2) That the D/DCHR ensure that HR Specialists properly apply residency preference and veterans' preference.

Agree \_\_\_\_\_ **X** \_\_\_\_\_ Disagree \_\_\_\_\_

### ***DCHR's Response, as Received:***

*The Associate Director, Workforce Recruiting Administration, DCHR, is constantly reinforcing the importance of the proper application of these preferences to the staff.*

- (3) That the D/DCHR revise the DPM to include guidelines for DCHR's practice of granting residency preference waivers.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ **X** \_\_\_\_\_

### ***DCHR's Response, as Received:***

*The Recruitment and Selection Guide published by the DCHR earlier this month contains language specifying that while there are no provisions that allow for waivers of the residency preference requirement, in cases of suitability or qualification issues a hiring official may submit a written justification for the approval of the personnel authority.*

**OIG Response: The OIG stands by its recommendation as stated. DCHR's response appears to meet the intent of this recommendation.**

## KEY FINDINGS

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5. **DCHR has not been reporting to agency heads the residency status of residency preference employees as required by the DPM.**

Selected applicants who claim residency preference must maintain District residency for 5 consecutive years. If employees relocate outside of the District during this period, they forfeit their positions.

DCHR does not monitor the status of District employees who have received residency preference as required. DPM §§ 309.1 through 309.2 state:

309.1 By November 1 of each year, each personnel authority shall submit to the Office of Tax and Revenue a listing which shall include the name, social security number, and employing agency of each person subject to the residency or domicile requirements who was appointed prior to January 1 of the current year.

309.2 The Office of Tax and Revenue shall provide, on a date specified by the Mayor, each personnel authority with information on the filing status of individual income tax returns for persons identified under § 309.1 for the returns filed in that calendar year. The information provided by the Office of Tax and Revenue shall include the mailing address used in filing the tax return.

As a supplement to the DPM regulations, DCHR developed the Merit Staffing Plan and issued administrative orders that clearly identified the roles and responsibilities of participants accountable for monitoring the residency status of employees subject to residency requirements. DPM, Chapter 3, Subpart 7.1A establishes the following reporting requirements:

- By October 15 of each year, the Deputy Director of the Management and Employee Services Administration (MESA) within DCHR and the DCHR HR Advisor shall prepare listings, by agency, of employees subject to residency preference requirements<sup>40</sup> and transmit the lists to the appropriate agency head. A copy of this listing must also be submitted to the Director/DCHR.
- Upon receipt of this listing, the agency head collects from each affected employee an affidavit which certifies that during the preceding year, he or she complied with the applicable residency requirement. Affidavits must be collected between November 1 and November 30.

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<sup>40</sup> This includes residency requirements applicable to the Senior Executive Attorney Service, and Excepted and Executive Service employees appointed before October 1, 2002.

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- The D/DCHR is responsible for forwarding the listing of employees subject to residency preference to the Office of Tax and Revenue (OTR) by November 1. OTR then provides DCHR a report by November 15 that contains the mailing address employees on the aforementioned listing reported when completing their tax returns.
- By November 25 of each year, the D/DCHR is to distribute the information obtained from OTR to the respective agency head. This allows the agency to monitor and verify whether an employee actually maintained residency within District.

DCHR has not complied with these reporting requirements. The inspection team requested that DCHR provide copies of residency requirement reports that were to be submitted to the OTR. A DCHR representative replied:

There currently is neither a responsible unit within DCHR nor a business process ... implemented to collect data on employees [who] must comply... [with] the District residency requirement. As part of DCHR's realignment and the Director's commitment to accountability a business process will be implemented to ensure accurate data is collected and reported.

The team contacted OTR to determine whether the agency had a record of receiving or generating residency requirement reports as outlined in DPM § 309.1 and § 309.2. An OTR representative stated, "We have not received any inquiries from D.C. Department of Human [R]esources concerning residency of personnel. . . . We have not provided any information under [DPM] §309 because we would not have any employee lists to research. This is a new issue to us."

DCHR is responsible for initiating the process to verify the residency status of employees subject to residency requirements. If DCHR does not generate a listing of employees subject to residency requirements, OTR cannot run a report that identifies those employees' mailing addresses. Consequently, agency directors may not be able to determine whether employees who claimed residency preference have moved outside of the District and therefore are now subject to termination. Some employees may have used residency preference to obtain a higher rating score during the selection process and are not maintaining residency in the District for the required period of time subsequent to being selected.

### **Recommendation:**

That the D/DCHR comply with policies and procedures for reporting the status of employees claiming residency preference.

Agree                                X                                Disagree                      \_\_\_\_\_

## KEY FINDINGS

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### ***DCHR's Response, as Received:***

*During previous administrations, compliance with this requirement was not always met. Under Mayor Fenty's Administration, the DCHR will ensure that all of the compliance requirements are met. The DCHR has submitted a listing to the Office of Tax and Revenue requesting information on the filing status of individual income tax returns filed in 2007 for employees with residency requirements, including residency preference. Upon receipt of the information from the OTR, the DCHR will report to agency heads on the status of residency preference employees.*

### **6. DCHR did not develop annual affirmative action plans as required by law.**

Affirmative action plans implement Equal Employment Opportunity (EEO) principles in the workplace. An EEO program strives to ensure that all personnel activities are conducted in a manner that assures equal access to all areas of employment. DCHR's vacancy announcements state, "All qualified candidates will receive consideration without regard to race, color, religion, national origin, sex, age, marital status, personal appearance, sexual orientation, family responsibilities, matriculation, physical handicap, or political affiliation."

D.C. Code § 1-521.02 (Repl. 2006) states, "Every District government agency shall develop and submit to the Mayor and Council an affirmative action plan. Such plan shall be submitted within 12 calendar weeks after May 6, 1976, and each year thereafter, at the time each agency's annual budget is submitted to the Council." DPM § 701.2 states, "The head of each agency shall be responsible for the implementation of the affirmative action plan to assure that the hiring, training, and promotional goals have been met." DCHR's affirmative action plan should outline a program for securing equal employment opportunity. The D.C. Code states:

The plan shall further state what actions the agency is taking to secure the equal employment opportunity within the agency of the groups enumerated in § 1-521.03, and of the aging, the young, the handicapped, and the homosexual citizens of the District, whether such citizens be actual or potential employees of the District government.<sup>41</sup>

The team found annual affirmative action plans for 2005 through 2007 were not submitted to the Mayor and City Council in accordance with D.C. Code § 1-521.02, and DCHR does not have a written affirmative action plan currently in place.

The absence of a formal DCHR affirmative action plan potentially compromises the implementation of specific actions in recruitment, hiring, and other areas designed to eliminate the present effects of past discrimination, or to prevent discrimination.

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<sup>41</sup> D.C. Code § 1-521.05 (Repl. 2006). Agency affirmative action plan--Program for securing equal employment opportunity.

## KEY FINDINGS

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### Recommendation:

That the D/DCHR develop and publish an affirmative action plan in accordance with District laws and regulations.

Agree                        X                        Disagree                    \_\_\_\_\_

### ***DCHR's Response, as Received:***

*The DCHR has begun is currently developing its Affirmative Action Plan and anticipates implementation by September 2008.*

### **7. Positions requiring licenses are not always identified, and applicants' licenses are not always verified prior to their employment.**

The D.C. Code requires that employees in a number of District government positions have licenses. The DPM states that DCHR is responsible for identifying licensure requirements and using them as qualification requirements to screen applicants. DPM § 804.3 states, in part, "Whenever the practice of certain occupations and professions is subject to licensure requirements (as established by District, State, or federal law), the possession of a license shall constitute a qualification requirement." DPM § 405.2(d) states, "Possession of a professional or other type of license shall be verified if it is a prerequisite for employment . . . ."

D.C. Code Title 3, Chapter 12 contains licensure requirements for health-related professionals, including nutritionists, physicians, nurses, occupational therapists, psychologists, and different types of social workers. In addition, 17 DCMR § 7013.2 states, in part: "Only an independent social worker or independent clinical social worker licensed under the Act, in good standing, shall be authorized to supervise the practice of: (a) A licensed social work associate; [and] (b) A licensed graduate social worker . . . ."

D.C. Code § 47-2853.04(a) (Repl. 2005) lists other non-health related occupations and professions that require licenses because they "have been determined to require regulation in order to protect public health, safety or welfare, or to assure the public that persons engaged in such occupations or professions have the specialized skills or training required to perform the services offered . . . ." These occupations include electricians, land surveyors, plumbers, refrigeration and air conditioning mechanics, and steam engineers.

The D.C. Code requires most professional engineers to be licensed, but exempts District government professional engineers from licensure requirements, a condition that, according to engineering licensure experts, may jeopardize public health and safety. The team issued a Management Alert Report (MAR 07-I-009) directing DCHR and the Department of Consumer and Regulatory Affairs (DCRA) to determine which District government professional engineering positions should require licenses and whether District law should be changed to remove the exemption. The MAR with DCHR and DCRA's responses are at Appendix 2.

## KEY FINDINGS

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*a. DCHR does not have processes in place to ensure that positions requiring licenses are identified.*

Out of 151 vacancy announcements posted on the DCHR website on March 26, 2007, the team identified 23 positions as requiring licenses according to the D.C. Code. Two vacancy announcements, which were for a nutritionist position and a social work position, should have listed licensure requirements, but did not. In addition, the team found eight vacancy announcements that were not detailed enough to determine if the positions should be subject to licensure requirements. These included five supervisory positions related to social work in which it was unclear if the positions would be supervising social workers, in which case an independent or independent clinical social work license is required.

Interviews indicated that DCHR does not determine if positions require licensure prior to posting vacancy announcements. The PeopleSoft system for vacancy announcements requires that HR Specialists review them prior to posting them online. Interviewees indicated that when HR Specialists review vacancy announcements, they check the corresponding position descriptions approved by the Classification Division to determine if licensure is required. Classifiers stated that they rely on agencies to identify licensure requirements and do not verify whether positions require licenses.

Interviewees stated that inadequate implementation of licensure requirements is related to a lack of written policies and procedures as well as understaffing. DCHR does not have policies and procedures for classifiers to ensure that licensure requirements are included in position descriptions. DCHR also lacks policies and procedures for HR Specialists to ensure that licensure requirements are included in vacancy announcements before they are posted.

Failure to identify licensure requirements increases the probability that employees do not meet the standards established by the D.C. Code. Unlicensed individuals in social work and other sensitive positions create potential health and safety risks and possible fiscal risks to the District government.

***DCHR's Response, as Received:***

*Disagree. Currently, the DCHR follows the Federal Evaluation System (FES) and federal qualification standards, which "dictate" licensure requirements for positions. This can be found at <http://www.opm.gov/qualifications/>. Most positions requiring licensure and positive education (graduation from a 4-year college and beyond) include classifications in the medical, financial, and scientific fields. The issue of licenses may be less clear in the area of social work associate and professional engineers. In these cases, the District government has licensure requirements while the federal classification requirements do not.*

**OIG Response: The OIG stands by its finding as stated. At the time of inspection, DCHR was not ensuring that it identified positions requiring licenses. License requirements are clearly established in District law, except for professional engineers as noted.**

## KEY FINDINGS

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***b. DCHR's lack of classification standards for social work associate positions has led to a large number of unlicensed social work practitioners in the District.***

D.C. Code § 3-1205.01 (2001) requires social work practitioners to be licensed, and D.C. Code § 3-1208.01 establishes social work associate licensure requirements, which are less advanced than those of other licensed social workers. Licensed social work associates, licensed graduate social workers, licensed independent social workers, and licensed independent clinical social workers have different scopes of practice.

Interviewees stated that some case worker and other social work positions should require social work associate licenses, but do not because DCHR has not finalized draft position classification standards to create social work associate positions. These standards describe duties and responsibilities and are used to determine a position's title, series, grade, and knowledge required for the position. Interviewees stated that understaffing in the Classification Division has prevented DCHR from issuing standards for social work associates. Interviewees stated that because DCHR has not finalized these standards, some positions are not identified as requiring licenses, even though the responsibilities of these positions require social work associate licenses. Managers in the Health Professional Licensing Administration (HPLA) in the Department of Health stated that the District government is one of the largest employers of unlicensed social workers in the District.

***DCHR's Response, as Received:***

*Disagree.* The DCHR has established a classification standard for the position of social worker. The DCHR is in the process of modifying the District's Social Worker classification standard to include the license requirement for the District.

**OIG Response: The OIG stands by its finding as stated. At the time of inspection, DCHR had not finalized a classification standard for social work associate positions.**

***c. DCHR lacks clear lines of responsibility for ensuring applicants have licenses for positions that require them.***

The DPM does not specify which employees within DCHR are responsible for ensuring that applicants have licenses before they are hired and instructions on how or when to verify licensure. Interviewees indicated that MESA was assigned responsibility for verifying licenses in March 2007, but that MESA employees did not have written standard operating procedures for this function.

Licensure requirements create professional knowledge, training, and education standards for professions affecting public health, safety, or welfare. Not having policies and procedures in place for checking licenses increases the likelihood that unlicensed applicants will be hired.

## KEY FINDINGS

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### ***DCHR's Response, as Received:***

*Disagree. For positions with a positive license requirement (i.e., medical officers, attorneys), the DCHR requires all new hires to provide valid proof of licensure prior to employment.*

OIG response: **The OIG stands by its finding as stated. At the time of inspection, DCHR had not developed or implemented written standard operating procedures that established who within DCHR is responsible for verifying licensure prior to hiring.**

### **Recommendations:**

- (1) That the D/DCHR determine which District government positions require licensure and advise District agencies to ensure that all applicants selected for positions and employees meet any applicable licensure requirements.

Agree \_\_\_\_\_ **X (in part)** \_\_\_\_\_ Disagree \_\_\_\_\_

### ***DCHR's Response, as Received:***

*The DCHR is clear on the kinds of positions with positive license requirements. As stated above, the DCHR requires all new hires to positions with such requirement to provide valid proof of licensure prior to employment. The DCHR is also conducting agency audits to determine employees with or without the proper licenses. There has been some hesitancy by agency and union officials to cooperate with DCHR for fear that some employees may deem to be not qualified for their positions. DCHR will continue to work with agencies and the unions for a positive resolution of this matter.*

- (2) That the D/DCHR develop and implement written policies and procedures to ensure that position descriptions and vacancy announcements contain applicable licensure requirements.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ **X** \_\_\_\_\_

### ***DCHR's Response, as Received:***

*The DCHR routinely includes licensure requirement information on positions descriptions and vacancy announcements. However, DCHR has determined that other documents used in developing standards or policies should bear the same information. All new and recertified position descriptions will contain licensure requirement information in accordance with OPM standards and/or District of Columbia law.*

OIG Response: **The OIG stands by the recommendation as stated. At the time of inspection, the team found that licensure requirements were not adequately identified on vacancy announcements. In addition, DCHR lacked written policies and procedures to**

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**ensure licensure requirements were included in vacancy announcements and position descriptions. DCHR's response appears to meet the intent of this recommendation.**

- (3) That the D/DCHR ensure that social work associate position classification standards are finalized expeditiously.

Agree \_\_\_\_\_ **X** \_\_\_\_\_ Disagree \_\_\_\_\_

***DCHR's Response, as Received:***

*With the formation of the new Compensation and Classification Administration, the DCHR is in the process of modifying the Social Worker classification standard to add license provisions for the Social Work Associate.*

- (4) That the D/DCHR collaborate with HPLA to conduct a thorough review of social work-related positions to ensure that licensure requirements are accurately identified.

Agree \_\_\_\_\_ **X** \_\_\_\_\_ Disagree \_\_\_\_\_

***DCHR's Response, as Received:***

*The DCHR will work with HPLA in the implementation of new standards to determine which positions require licensure and which positions do not require licensure.*

- (5) That the D/DCHR develop and implement written standard operating procedures that establish who within DCHR is responsible for verifying licensure prior to hiring.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ **X** \_\_\_\_\_

***DCHR's Response, as Received:***

*The responsibility for verifying the licensure status of applicants is that of the HR Specialist in the WRA. Licensure certification is part of the suitability review that each HR specialist must perform during the required pre-employment inquiry on new hires. The DCHR will ensure that all HR Specialists understand their role in this matter and provide training as necessary.*

**OIG response: The OIG stands by its recommendation as stated. At the time of inspection, DCHR did not have written standard operating procedures to help ensure accountability for verifying licensure.**

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- (6) That the D/DCHR ensure that DCHR employees responsible for verifying licensure are knowledgeable about their responsibilities for this function.

Agree \_\_\_\_\_ **X** \_\_\_\_\_ Disagree \_\_\_\_\_

**8. DCHR is not adequately staffed to carry out all of its tasks effectively.**

It appears that DCHR is not operating at an optimal staffing level. Federal government best practices for internal control recommend that:

**[an] agency [have] the appropriate number of employees, particularly in managerial positions. Consider the following:**

- Managers and supervisors have time to carry out their duties and responsibilities.<sup>42</sup>

Between 2004 and 2006, DCHR lost approximately 75 employees due to a combination of resignations, retirements, transfers to other agencies, and termination of appointments.<sup>43</sup> Further, at the start of this inspection, there were approximately 25 vacancies, representing 19 percent of DCHR staff. When asked to identify the major problem DCHR faces, one manager stated that the agency is in a management crisis because “there are too few, ready-to-perform managers on staff and many of the most competent have moved on to other agencies. DCOP’s management team has turned over nearly 90% in the past 2 years, there is very little institutional knowledge, and the challenges to be addressed are enormous.”

The team observed pronounced staffing deficiencies in the Records Division, the Classification Division, and MESA. The Records Division maintains files for approximately 25,000 District employees, and 2 of its 4 positions are vacant. The lack of staffing in this division led to a backlog in filing OPFs, and contractors were hired to assist with reducing a backlog of inactive files and preparing them for storage. Interviewees in the Classification Division stated that it had insufficient staff to fulfill its responsibilities, including regularly reviewing positions. MESA, DCHR’s staffing and recruiting division, is also understaffed. According to DCHR survey respondents and employee interviews, many workers feel overwhelmed with the high volume of work they receive.

The team found that DCHR’s staffing level is lower than the number recommended by HR best practices. This was determined by using a commonly accepted, HR industry measurement called “the HR-to-employee ratio.”<sup>44</sup> The HR-to-employee ratio is a formula used

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<sup>42</sup> Government Accountability Office, Internal Control Management and Evaluation Tool, GAO-01-1008G (Aug. 2001) at 16.

<sup>43</sup> The termination of appointments grouping includes appointments to temporary, term, When Actually Employed, and Temporary Appointment Pending Establishment of a Register positions, which are for specified timeframes.

<sup>44</sup> See <http://www.shrm.org/research/benchmarks/occupations.asp> (last visited Jul. 23, 2007).

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to determine whether the number of FTEs within an HR department sufficiently meets the needs of the employees it serves. According to DCHR management, the median ratio is 1.1 HR employees per 100 organizational employees. DCHR's HR-to-employee ratio, however, is 0.4 to 100.<sup>45</sup> This ratio is calculated by dividing the total number of DCHR employees by the number of District government employees it serves. DCHR provides full services to 17,000 District employees under the authority of the Mayor, and provides limited HR services to approximately 17,000 more District employees in independent and quasi-independent agencies, as well as the District's public schools.<sup>46</sup> DCHR's FY 2007 annual budget allocated 135 FTEs to the agency, but as of March 2007, it was operating with only 112 FTEs.

The lack of staffing may have reduced DCHR's efficiency. HR Advisor survey respondents expressed this sentiment when only 31 percent agreed that DCHR's hiring process was efficient. District agency hiring managers have also complained that the hiring process is time-consuming, and this may be, in part, the result of DCHR's understaffing.

### ***DCHR's Response, as Received:***

*Agree in part. At the beginning of Mayor Adrian M. Fenty's administration, the DCHR had more than 20 positions vacant. The DCHR staff had dwindled from a core staff of 171 employees in 2001, to less than 135 employees in January 2007. The DCHR took immediate steps to fill all vacancies starting with the hire of a Deputy Director, Chief of Staff, and four (4) Associate Directors. Over the last year, the DCHR has filled most of its HR Specialist positions in the WRA, Benefits and Retirement Administration, and Workforce Development Administration. The DCHR will continue to fill vacancies quickly and work to be at the optimum staffing levels. The challenge for the DCHR over the next year will be to adequately staff the Audit and Compliance Unit to implement the background investigation, criminal history, and drug and alcohol testing requirements. The DCHR will be requesting additional positions at its upcoming Council budget hearings. (See Exhibit 4, page 13, which contains information about the ratios of HR employees to organizational employees)*

### **Recommendations:**

- (1) That the D/DCHR conduct a staffing analysis to determine which DCHR divisions are understaffed.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ **X** \_\_\_\_\_

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<sup>45</sup> The team divided the number of approved, DCHR FTEs (135) by the number of District government employees served (34,000) to obtain the HR-to-employee ratio of .4 to 100. If the number of vacant positions within DCHR were accounted for when calculating the HR to employee ratio, the ratio would be lower than .4 to 100.

<sup>46</sup> "Agency Performance Oversight Hearing on Fiscal Year 2006-2007 Budgets," Testimony of Brender L. Gregory, Acting Director for the D.C. Department of Human Resources, Feb. 16, 2007.

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### ***DCHR's Response, as Received:***

*Disagree. The DCHR has adequately studied this issue and understand the issues to be addressed. Previous studies of HR functions, coupled with the input from DCHR Associate Directors, make it clear that the DCHR must take steps to enhance the skills-set of its current staff, and ensure that future hires have been trained in various aspects of HR management. For example, because there are staffing deficiencies in the Classification Unit, the unit is limited in its ability to fulfill its responsibilities, including regularly reviewing positions. The next step towards professionalizing the staff is for the Executive Branch and the Council to approve DCHR's budget enhancements in this area. (See Exhibit 5, BNA Report)*

OIG Response: **DCHR's response appears to meet the intent of this recommendation.**

- (2) That the D/DCHR, in order to improve the efficiency and timeliness of the District's hiring process, identify and implement strategies to more quickly fill vacant positions within DCHR.

Agree \_\_\_\_\_ **X** \_\_\_\_\_ Disagree \_\_\_\_\_

### ***DCHR's Response, as Received:***

*As stated in response to question 8 (a) above [DCHR response to finding 8a], the DCHR understand the issues to be addressed and is looking into and is taking steps to shorten the time it takes to fill vacancies.*

- (3) That the D/DCHR, in order to mitigate the impact of DCHR's staffing deficiencies, and to improve the efficiency and timeliness of the District's hiring process, explore the efficacy of allowing District agencies to assume duties normally performed by DCHR personnel, such as the receipt and screening of application packages.

Agree \_\_\_\_\_ **X** \_\_\_\_\_ Disagree \_\_\_\_\_

### ***DCHR's Response, as Received:***

*The DCHR has already taken steps to delegate limited personnel authority to District agencies to allow them to engage in recruitment and selection activities. During fiscal year 2007, DCHR delegated limited personnel authority to the Office of the Attorney General. Other agencies that have independent personnel authority include the Metropolitan Police Department and the Department of Disability Services. In addition, DCHR has expanded the authority of HR Advisors of nine (9) agencies to conduct more recruiting functions. The DCHR anticipates that it may be able to expand personnel recruiting functions to other HR Advisors as they become more skilled at rating and ranking applications. The DCHR Recruitment and Selection Guide is an important tool for HR Advisors to use as reference guides once they are given the expanded authority.*

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## APPLICATION AND SELECTION

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DCHR's primary platform for advertising vacancy announcements is an online website ([www.dchr.dc.gov](http://www.dchr.dc.gov)). District agencies can also advertise in public media such as newspapers, trade publications, and public websites. Applicants responding to announcements can apply online or submit a completed D.C. Employment Application (DC2000) to DCHR's Job Information Center. Potential applicants can also view vacancy announcements and complete applications in person at DCHR's Job Information Center. Customer service representatives at the center assist clients in completing the DC2000, and provide receipts to confirm that they have applied.

When mail-in and walk-in applications are submitted, they are date and time-stamped, logged into an applicant tracking system, and placed in merit case files. HR Specialists receive online applications through the PeopleSoft Human Resources Information System. When vacancy announcements close, online applications are printed and compiled with mail-in and walk-in applications. HR Specialists assess the applications for completeness and determine which respondents meet the minimum qualifications. Candidates meeting minimum qualification standards have their responses to ranking factor questions scored by the HR Specialist and/or a ranking panel from the hiring agency.<sup>47</sup> Each applicant's rating score is converted to a categorical ranking. After the ranking process, the hiring agency receives a selection certificate, which lists applicants in the highest categorical ranking, and candidate application materials. Residency preference candidates and eligible veterans receive preference in selection. A detailed flow chart of the hiring process can be found at Appendix 5.

### **9. The online application does not require vital background information.**

When applying for employment, candidates have the option of completing the DC2000, a hard-copy job application that can be mailed in or hand-delivered to DCHR, or they can apply online through DCHR's website. When comparing the DC2000 to the online job application form, the team observed a distinct difference. The DC2000 contains a section entitled "Background Information," which lists questions about the applicant's background. Applicants must answer each of the following questions:

- a. During the past 10 years have you been: 1) convicted of or forfeited collateral for **any felony**; or 2) convicted by a **court-martial**?

• • •

If you answered YES to "a" GIVE DETAILS IN THE SPACE BELOW. For each violation, write the 1) date; 2) charge; 3) place of violation; 4) court; and 5) action taken by the court.

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<sup>47</sup> Ranking panels are groups of subject matter experts from hiring agencies who evaluate candidates' qualifications and responses to ranking factors. HR Specialists monitor the ranking panel process and provide guidance to panel members.

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- b. Do any of your relatives work for the District government?  
Include: father, mother, husband, wife, son, daughter, brother, sister, uncle, aunt, first cousin, niece, nephew, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, stepfather, stepmother, stepson, stepdaughter, stepsister, half brother, and half sister. If YES, in the space below, write for each of these relatives their: 1) name; 2) relationship to you, and 3) agency of the District of Columbia government in which the person works.
- c. Do you receive or have you ever applied for retirement pay, pension, or other pay based on District of Columbia government or federal civilian or military service?
- • •
- d. Are you a citizen of the United States?
- e. Are you legally authorized to work in the United States?

The online application, however, only asks respondents whether they are U.S. citizens and omits the four remaining questions.

Background information questions help determine whether applicants are qualified and suitable for a job. However, because online applications and DC2000s do not request identical information, applicants are subject to different levels of disclosure and accountability. Upon signing and submitting employment applications, respondents certify that they understand that a false statement on any part of their application may be grounds for not hiring them, or for terminating them after they begin work. In addition, making a false statement on a job application is punishable by criminal penalties. Consequently, respondents seeking employment may opt to submit an online application because DC2000s request information that may lessen or eliminate their chance for consideration. Given the lack of clear responsibility for conducting background checks, strong internal controls during the application phase are important.

### **Recommendation:**

That the D/DCHR ensure that the online application requests the same background information from applicants as does the DC2000 hard copy application.

Agree                X                Disagree      \_\_\_\_\_

### ***DCHR's Response, as Received:***

*The DCHR has taken steps to fully implement all 11 modules of the PeopleSoft HR Information System. The DCHR, in consultation with the Office of the Chief Technology Officer, has hired subject-matter experts to fully implement all modules including the background*

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*investigations section of PeopleSoft that would require applicants to answer background questions similar to, if not identical, to the questions currently appearing on the DC Form 2000 Employment Application.*

### **10. Some OPFs lack documentation of employment suitability.**

The team reviewed and analyzed vacancy announcements, merit case files, and Career Service employees' OPFs.<sup>48</sup> The review focused on employees working with children, youth, and the elderly as well as those with safety, sensitive, and law enforcement duties.

The team reviewed the files of those employees appearing to merit employment suitability verification based on the nature of their duties and responsibilities. The review found OPFs that did not contain employees' appointment status and results of reference checks. For example, OPFs did not contain documentation confirming that two Victim Witness Program Specialists within the Office of the Attorney General (OAG) who work with abused children and youth had undergone background checks validating their employment suitability. An OPF for a Supervisory Correctional Officer working for the Department of Youth Rehabilitative Services did not contain documentation verifying the supervisor's work experience and reference checks. In addition, there was no documentation that the supervisor had undergone a criminal background check and drug testing in accordance with the Act.

The absence of pre-employment documentation in OPFs prevents verification that employees working with children and youths and in other sensitive positions have been properly evaluated and deemed suitable for employment.

#### **Recommendation:**

That the D/DCHR ensure that documentation confirming that employees have undergone pre-employment background checks as stated in the DPM is stored in the appropriate files.

Agree                          X                          Disagree                      \_\_\_\_\_

#### ***DCHR's Response, as Received:***

*DCHR Administrative Order AO-07-13, Guidelines for Pre-Employment Inquiries on New Appointments dated December 11, 2007 (See Exhibit 6) was issued to staff within the DCHR responsible for processing appointed or selected for employment within the District government. The order establishes pre-employment screening procedures and provides official guidance on how to determine suitability of candidates.*

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<sup>48</sup> OPFs contain employees' previous employment verification, benefits selection, and other personnel actions.

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### 11. **Receipt of incomplete online applications may limit the pool of qualified applicants.**

Vacancy announcements contain ranking factor questions that applicants must respond to or they may be eliminated from consideration. Ranking factors are evaluation tools used to assess applicants' knowledge, skills, abilities, and aptitude to perform the job advertised. During interviews with HR Specialists, the team learned that quite often, ranking factor responses are not included in applications submitted through DCHR's website. DCHR employees speculated that there may be a malfunction in PeopleSoft that occasionally causes ranking factor responses to be deleted during online transmission of applications. Some HR Specialists stated that because this is a recurring problem, they depart from DCHR guidelines and do not automatically disqualify online applications that lack ranking factor responses. Rather, they contact the online applicants, determine whether the responses were sent but deleted by the system, and if so, allow applicants to resubmit their responses directly to an HR Specialist.

The cause and magnitude of this online submission problem is undetermined. HR Specialists speculate that there may be a systemic PeopleSoft problem that causes the loss of data during transmission of applications to DCHR, or applicants may not know how to successfully navigate through DCHR's online application process. Applicants have reported to HR Specialists that the system is not user-friendly, times-out prior to application completion, and does not save application information. A representative of the Administrative Services Modernization Program (ASMP)<sup>49</sup> stated that DCHR has not reported problems regarding the receipt of incomplete online applications. Therefore, there have not been any attempts to determine whether a systemic problem is causing deletion of information in online applications.

Individuals submitting applications through DCHR's website are at a disadvantage compared to those submitting applications manually because there is a chance that information contained in online applications will not be received by DCHR. In the event that this happens, the candidate may be disqualified for submitting an incomplete application. Any systemic problems that limit the number of complete applications received may also limit the number of qualified applicants evaluated. This may result in the agency cancelling and re-posting a vacancy because hiring managers were not satisfied with the candidates they received.

#### **Recommendation:**

That the D/DCHR, in conjunction with ASMP, conduct an assessment of the online application process to determine why online applications are often incomplete, and work to resolve the problem expeditiously.

Agree \_\_\_\_\_ **X** \_\_\_\_\_ Disagree \_\_\_\_\_

#### ***DCHR's Response, as Received:***

*See response to question 9 [DCHR response to finding 9].*

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<sup>49</sup> ASMP is a subunit of the Office of the Chief Technology Officer (OCTO). ASMP retains ownership of the PeopleSoft system and is responsible for resolving technical problems.

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*Additionally, a key feature the DCHR will implement by the end of fiscal year 2008 is the section of Peoplesoft that requires applicants to answer specific questions on knowledge, skills, and abilities to derive ranking factors. This feature is very similar to what currently appears on the USA JOBS Website. Once implemented, applicants will be automatically rated and ranked according to the information provided during the application process. The software program also has a feature that would automatically place the qualified applicants on a certificate of eligibles.*

*The DCHR is confident that this feature will not only enhance the online process but take the subjectivity out of the process of determining which applicants are the most qualified.*

### **12. Internal controls for receiving and tracking applications are inadequate.**

DCHR provided the team with a hiring process flow chart detailing procedures for processing hand-delivered, mailed, and online applications. The chart shows that Job Information Center employees document the receipt of DC2000s that are hand-delivered or mailed, and HR Specialists track applications received through the website.

When job announcements close, DCHR employees run one report documenting all hand-delivered and mail-in applications and another report documenting online applications. An HR Specialist reviews both reports, verifies that applications for each individual are accounted for, and retains copies of the reports in the merit case file. This process serves as an internal control to ensure that HR Specialists receive and evaluate all applications. This internal control, however, may not be adequately applied. Seventy-seven percent of HR Advisor survey respondents and 78 percent of DCHR employees stated that there have been instances where DCHR has lost applicant paperwork. Agency hiring managers also reported instances of DCHR losing mail-in and walk-in applications. For example, hiring managers reported instances of qualified candidates applying for a vacancy, but not appearing on the selection certificate. In response to inquiries by hiring managers, the HR Specialist sometimes claimed that candidates had not submitted applications. However, candidates were able to document that they had submitted applications to DCHR prior to the closing date of the vacancy announcement. DCHR then searched for the applications or allowed the candidates to submit additional copies for consideration.

Interviews and a review of nine merit case files indicated that HR Specialists do not routinely document receipt of online applications. During a review of merit case files, the team observed that most did not contain online application reports. None of the interviewees stated that they include online reports in merit case files. Consequently, the receipt and filing of online applications cannot be verified. This deficiency reduces transparency and accountability within the hiring process.

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### Recommendation:

That the D/DCHR strengthen internal controls to ensure that employment applications are properly accounted for from the point of receipt to filing in the respective merit case file.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ **X** \_\_\_\_\_

### ***DCHR's Response, as Received:***

*The WRA utilizes an electronic tracking system as well as a rotating filing schedule to minimize exposure regarding misplaced applications.*

OIG Response: **The OIG stands by its recommendation as stated. During the time of this inspection, agency personnel reported that applications are sometimes lost. Improved internal controls for tracking and processing applications will help ensure that they are properly accounted for.**

### **13. Monitoring of the ranking panel process is inconsistent.**

A senior DCHR manager provided an overview of the ranking panel process. During planning to fill an employment vacancy, and before the vacancy is posted, an agency should decide whether it will form a ranking panel to rank applicants. HR Specialists determine whether applicants meet minimum qualification standards and forward application packages meeting these standards to the agency with a cover memorandum. The agency ranking panel, consisting of subject matter experts, convenes to review applications and rank applicants. A HR Specialist should be on site during the ranking panel process. If the hiring agency ranks the applicants, it should use a DCHR ranking sheet to evaluate targeted attributes within applicants' credentials. Points are assessed for the ranking factors, and the ranking panel members tally scores to identify the best qualified applicants. The agency then informs the HR Specialist of the list of applicants to be placed on the selection certificate, who prepares the certificate and sends it to the hiring agency. The hiring agency can select applicants from the selection certificate based on their submitted credentials or based on interviews. If interviews are conducted, all applicants must be invited to be interviewed. An agency can use one or more persons to conduct interviews. The agency returns the selection certificate to the HR Specialist with an "S" annotated next to the name of the applicant to be offered employment. The HR Specialist then offers employment to the selected applicant. A detailed flow chart of the ranking panel process can be found at Appendix 6.

The Merit Staffing Plan, § A.11.D.1 states, "The ranking panel members (RPM) evaluate applicants who meet the minimum qualifications and selective factors for a position as determined previously by an authorized personnel representative." In addition, the Merit Staffing Plan, § A.11.D.4 states, "In all cases a personal [sic] representative will serve as the monitor, shall instruct the panel in the proper evaluation procedures, and shall review its rating and ranking for consistency and for correct use of the Ranking Plan."

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There are inconsistencies in whether ranking panels are allowed to interview applicants and how HR Specialists monitor the panel process. HR Specialists' comments differed as to whether agencies may interview applicants as part of the ranking process prior to the establishment of a selection certificate. In addition, some HR Specialists stated that they do not need to attend the ranking panel process if they review documentation of how the panel ranked applicants.

DCHR does not have policies and procedures for ranking panels beyond those stated in the Merit Staffing Plan, which is a section of the DPM that provides instructions for executing the hiring process. However, the Merit Staffing Plan does not specify whether monitoring by personnel representatives entails being on site during the ranking process. In addition, it does not state which evaluation methods ranking panels can use, such as interviews.

Consequently, agencies are not following a standard process for ranking panels, and there are varying levels of DCHR oversight. The absence of HR Specialists during rankings minimizes DCHR's oversight and may lead to unfair hiring practices and lack of EEO compliance. Interviewing applicants after the generation of a selection certificate may reveal that residency preference applicants are not qualified, yet an agency cannot hire a more qualified non-resident from the selection certificate. In contrast, an agency that is permitted to use interviews in the ranking panel process can better determine whether candidates are likely to be successful employees before a selection certificate is generated.

### Recommendations:

- (1) That the D/DCHR establish written policies and procedures for monitoring ranking panels and conducting interviews as part of the ranking process.

Agree \_\_\_\_\_ Disagree       X      

### *DCHR's Response, as Received:*

*The Merit Staffing Plan contained in Appendix A of Part II of Chapter 8 of the DPM, Career Service, provides procedures on the ranking panel process. These include information regarding the composition of the ranking panels up to the actual ranking applicants. The DCHR will ensure that the procedures set forth in the Merit Staffing Plan are consistently followed. In addition, the DCHR is reviewing various rating and ranking processes based on surrounding jurisdictions and is considering including the interview as part of the ranking process.*

**OIG Response: The OIG stands by the recommendation as stated. As discussed in the finding, the Merit Staffing Plan does not specify how personnel representatives should monitor ranking panels or which evaluation methods ranking panels can use.**

- (2) That the D/DCHR ensure that HR Specialists and District agencies are trained on the use of ranking panels.

Agree \_\_\_\_\_ Disagree       X

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### ***DCHR's Response, as Received:***

*HR Specialists are educated on the ranking panel process, expectations and their role. In addition to written material such as the Merit Staffing Plan and the Selection and Recruitment Guide, District agencies are afforded the opportunity to receive one-on-one training upon request. However, training will be conducted on any new procedures developed based on changes to the merit staffing plan.*

OIG response: **The OIG stands by the recommendation as stated. At the time of inspection, the team found a lack of uniformity in HR Specialists' responses regarding the ranking panel process, indicating the need for training to promote consistency.**

### **14. Policies and procedures for maintenance of merit case files are not followed.**

According to Section A.16 B of the Merit Staffing Plan, DCHR must retain records of all actions taken to fulfill job vacancies for 2 years after the date of applicant selection or cancellation of the vacancy announcement. In order to comply with this policy, HR Specialists maintain merit case files containing information used to select candidates. The Merit Staffing Plan also identifies items that must be maintained within each merit case file.

The team reviewed nine merit case files to determine if they complied with documentation requirements established in DCHR's Merit Staffing Plan. The team found that many of the files were incomplete and did not sufficiently document how and why applicants were selected for employment. Of the nine files that were reviewed, the team found that:

- four lacked position descriptions,
- five lacked initial screening sheets,
- five lacked rating and ranking sheets, and
- four lacked selection certificates.

These items are of critical importance in determining if candidates were properly evaluated and hired.

DCHR's Merit Staffing Case File Checklist (Form 1249 at Appendix 7) identifies information that should be contained within each file to document the hiring process. The form indicates that the HR Specialist completes the checklist and a reviewing official verifies that the file is complete prior to storage. However, HR Specialists and reviewing officials do not consistently use this form to document merit case file contents. As a result, there is a lack of oversight to ensure that files contain proper documentation.

According to Sections A.14B and C of the Merit Staffing Plan, applicants who were not selected for a position can appeal the hiring decision and are entitled to the following information concerning their consideration for the position:

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- a. any record of performance or supervisory evaluation not submitted by the candidate which was used in considering him or her for selection;
- b. whether he or she was found eligible on the basis of minimum qualifications (including selective factors) for the position;
- c. whether he or she was among the candidates referred to the selecting official;
- d. his or her categorical ranking; and
- e. the name of the individual selected.<sup>50</sup>

In the event that a hiring decision is contested, DCHR's merit case files may not contain documentation substantiating why a particular candidate was or was not selected. In addition, failure to document the hiring process decreases transparency and may increase the potential for unfair hiring practices.

### **Recommendation:**

That the D/DCHR ensure that employees comply fully with the Merit Staffing Plan's requirements for maintaining all records related to candidate selection.

Agree \_\_\_\_\_ Disagree     X    

### ***DCHR's Response, as Received:***

*DCHR is committed to maintaining the integrity of the merit case files. As such, DCHR, WRA has committed to an internal audit process.*

**OIG Response: The OIG stands by its recommendation as stated. During the time of this inspection, the team observed incomplete merit case files. By adhering to existing internal policies and procedures, DCHR will reduce this occurrence. DCHR's response appears to meet the intent of this recommendation.**

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<sup>50</sup> *Id.* § A.14 B.

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**Findings and  
Recommendations:**

**COMPENSATION AND  
CLASSIFICATION**

## COMPENSATION AND CLASSIFICATION

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## COMPENSATION AND CLASSIFICATION

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The Compensation Division manages the District's salary schedules. For example, the division developed the FY 2006 pay parity increases to bring non-union salaries to the same level as most union salaries. This division also determines the total costs of labor contract proposals and makes recommendations for negotiations with unions. The Compensation Division also reviews and proposes pay policies, such as for differential pay for night shifts.

The classification process is used to determine position titles, occupational series, and pay grades based on duties and responsibilities. Before agencies can initiate hiring, new positions must be classified, and existing positions should be reviewed. When an agency identifies the need for a new position, it submits a draft position description describing the position's duties to DCHR's Classification Division. The Classification Division works with the agency to revise the position description, if necessary, before approving it and assigning a job code to the position that corresponds with how it has been classified. If agency managers or employees believe positions are incorrectly classified, they may request desk audits, which are reviews of the actual duties and responsibilities required. The Classification Division also provides guidance to agencies regarding reorganizations, realignments, and position management.<sup>51</sup>

### **15. The compensation and classification systems are outdated and contribute to recruitment problems.**

The District's Career Service compensation and classification systems are modeled after the federal government's General Schedule system, which has been identified as in need of reform. An April 2002 white paper entitled *A Fresh Start for Federal Pay: The Case for Modernization* from the U.S. Office of Personnel Management (OPM) evaluates the state of federal compensation and classification. OPM describes the problem as follows:

To meet the challenges of the present – and to anticipate and overcome the challenges of the future – Government must design and use merit-based policies and systems that are more modern, strategic, and results-focused. If the Government is to recruit, manage, and retain the human capital needed to accomplish and sustain this transformation, its white-collar pay system would need to:

- Achieve the principle of providing equal pay for work of equal value;
- Provide agencies the means to offer competitive salary levels on a timely, rational basis;
- Recognize competencies and results, at both the individual and organizational level; and

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<sup>51</sup> Position management is the process of ensuring that positions are organized appropriately to support agencies' missions.

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- Orient employee efforts and pay expenditures toward mission accomplishment.

This White Paper examines the extent to which the current Federal white-collar pay system – the General Schedule covering 1.2 million employees – achieves these objectives. OPM believes the system would have to be judged as failing this examination, for several reasons:

- **The Government asks its agency leaders to face new and unprecedented management challenges using an antiquated pay system. . . .**
- **The current pay system does not reflect market pay levels. . . .**
- **It has minimal ability to encourage and reward achievement and results. . . .**
- **Its structure suits the workforce of 1950, not today’s knowledge workers. . . .**
- **Its prescribed procedures and practices effectively preclude agencies from tailoring pay programs to their specific missions and labor markets. . . .**<sup>52</sup>

In contrast to the federal government and the District, jurisdictions such as Fairfax County, Virginia and Montgomery County, Maryland have flexible, modern compensation and classification systems. Montgomery County’s Office of Human Resources has policies permitting consideration of public and private sector salaries for similar positions when classifying positions.<sup>53</sup> Fairfax County has open range salary schedules for most employees that consist of a minimum and maximum salaries for each position with pay increases based on merit rather than within-grade step increases based on length of employment.<sup>54</sup> Although District and federal managers have open-range salary schedules based on performance, step increases based on time-in-grade rather than merit are the basis for pay increases for most non-managerial employees.<sup>55</sup>

DCHR interviewees stated that problems resulting from the compensation and classification systems include salaries that do not reflect market pay levels and outdated classification standards. Pay for District government employees is based on federal classification standards for different occupational groups and the federal Factor Evaluation System, which analyzes the duties and responsibilities of a position to assign it to a grade. Interviewees stated that the lack of labor market analysis to determine compensation results in

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<sup>52</sup> *Id.* at v-vi.

<sup>53</sup> See website at <http://www.montgomerycountymd.gov/content/ohr/ResourceLibrary/files/MCPR0109.pdf>.

<sup>54</sup> See website at [http://www.fairfaxcounty.gov/hr/regs\\_pdf/chap4.pdf](http://www.fairfaxcounty.gov/hr/regs_pdf/chap4.pdf), <http://www.fairfaxcounty.gov/hr/PAY-PLAN/FY07/SPlan07.pdf>, and <http://www.fairfaxcounty.gov/hr/PAY-PLAN/FY07/Pay07.htm>.

<sup>55</sup> Most of the District’s pay scales have 10 steps in each grade. Employees receive 1 step increase per year until they reach step 5, at which point they receive a step increase every 2 years until they reach step 10.

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the District paying more than market rates for some occupations and less than market rates for others.

The team found that the federal position classification standards, which the District uses, are outdated for many occupations. Position classification standards are used to determine a position's title, series, and grade. For example, the position classification standards for the administrative assistant series are from 1979; standards for the social services series are from 1965; and economist standards are from 1963. However, standards and required knowledge for various professions and positions change over time.

Interviewees stated that DCHR has not had the resources to undertake systemic compensation and classification reform and believed this has not been a priority for the District government. For FY 2007, the Classification Division had nine FTEs budgeted, and the Compensation Division had two FTEs budgeted. For FY 2008, DCHR requested a budget enhancement of \$1,272,000 and three additional FTEs for the Compensation Division to “develop flexible, rational, and market-driven classification/compensation systems . . . .”<sup>56</sup> However, the FY 2008 budget submitted to Congress on June 7, 2007, reduced funding for the Classification and Compensation Divisions by a total of \$419,353 and 3.5 FTEs compared to the FY 2007 budget.<sup>57</sup>

DCHR employees stated that the District's use of special pay schedules to increase salaries for certain occupational groups, sometimes in specific agencies, is an ineffective response to compensation and classification issues. According to DCHR's written testimony for an oversight hearing held February 16, 2007, DCHR reduced the number of pay schedules from 75 to 60 in FY 2006. However, employees stated that a system with 60 pay schedules is complicated to administer, and sometimes creates differences in pay for similar positions in different agencies.

Compensation and classification problems lead to failures to identify skills needed for some positions and salaries that do not reflect market rates. For example, the process of classifying administrative positions is based on classification standards developed before the widespread use of computers; therefore, these classifications do not consider the level of computer knowledge required when grading a position. DCHR employees stated that the classification system's failure to identify needed skills can contribute to mismatches between employees' abilities and their positions. Interviewees identified pay for administrative and clerical positions as often above market rates, and pay for technical and professional occupations as often below market rates. Lack of labor market analysis in setting salaries results in inflated personnel costs for occupations paid above market rates while creating recruitment and retention problems for occupations paid below market rates.

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<sup>56</sup> DCHR FY 2008 Enhancement Request—Form B (quoting DCHR FY 2007-2008 Strategic Plan).

<sup>57</sup> FY 2008 Proposed Budget and Financial Plan, Vol. 2A (Jun. 7, 2007) at A-89.

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### **Recommendation:**

That the D/DCHR develop and implement a plan for compensation and classification reform based on best practices in other jurisdictions such as Fairfax and Montgomery Counties and the District's HR needs.

Agree                        X                        Disagree                    \_\_\_\_\_

### ***DCHR's Response, as Received:***

*However, the audit report has not provided empirical evidence that proves there is a correlation between compensation rates and recruitment retention problems. Without examining other issues and conducting real data analysis, it is not appropriate to state that compensation is the sole culprit; one must look at total rewards, including benefits, work culture, and work life balance. Recruitment problems cannot be blamed solely on compensation since it does not take into account recruiting efforts, marketing of District government, organizational cultural, total compensation (retirement benefits lag by at least 15%), and other progressive HR policies such as flexible work schedules and employee development (See Exhibit 7). In fact, the Auditor's report has contrary evidence on page 60, which states that the District government may even be "over-compensating" certain positions.*

*Based on theory and review of the District government's federally inherited systems, the utilization of old standards, non-reliance on marketplace principles and decision making, and rule intensive policies of the compensation and classification system, one can reasonably conclude that the systems have been outdated for some time now, resulting in both under payment and over payment of employees within certain occupations and skill sets. It is important to note that these systems have not been fully controlled by the DCHR. Accordingly, laying the blame solely on the DCHR is unwarranted. The problem with the federal government compensation and classification system has been known for years. (See Exhibit 8, Consultant Reports).*

*The District compensation system changes have been as a result of collective bargaining, which has been handled by a separate office, the Office of Labor Relations and Collective Bargaining (OLRCB). Because the unions and OLRCB are somewhat reluctant to changes of current systems (they tend to "cling" to time-in-grade provisions and steps instead of more progressive compensation plans based on performance/skills), more changes have not occurred as rapidly as the DCHR would have liked.*

*The DCHR has made some strides in changing systems to be more progressive, such as the implementation of open range salary schedules and pay-for-performance systems; and new union pay schedules. With these changes come greater responsibility on the part of supervisory and non-supervisory employees and agencies, in terms of making compensation and classification decisions.*

*The DCHR has also begun working on changes to the entire compensation and classification system in fiscal years 2007 and 2008. In the fall of 2007, the DCHR entered into a*

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*contractual relationship to study the needs for a new system (and assist with the drafting of the Request for Proposal (RFP)). In January/February 2008, the DCHR expects to make public the RFP that will require a contractor to spend one (1) to two (2) years designing and implementing a new classification and compensation system.*

**16. The classification process does not meet agencies' expectations for timeliness, and DCHR does not have performance measures for the timeliness of classification actions.**

GAO's Internal Control Management and Evaluation Tool (GAO-01-1008G, Aug. 2001) states that an agency should ensure that it "has established and monitors performance measures and indicators."<sup>58</sup>

Interviewees stated that HR Advisors and agency managers were concerned about the timeliness of classification actions. The team analyzed data from 867 classification actions completed between January 17, 2006, and March 5, 2007, excluding desk audits. On average, 37 calendar days elapsed between receipt and completion of a classification request. Interviewees stated that the database the team analyzed was the only tool in place for tracking the timeliness of classification actions and that employees were not certain about its completeness. In contrast, Montgomery County, Maryland took 4 days on average in 2003 to classify newly created and vacant positions.<sup>59</sup>

Employees indicated that the Classification Division does not have written performance measures in place for the timeliness of classification actions, such as classifying new positions and reclassifying existing positions. Interviewees stated that although the former D/DCHR issued a memorandum to agencies regarding tentative goals for processing classification actions, the DCHR Classification Division did not receive this memorandum or other written guidelines for timeliness of processing classification actions.

Interviewees stated that delays result from understaffing, a cumbersome classification process, and the need to significantly revise position descriptions. They stated that the Classification Division does not have enough classifiers to fulfill its responsibilities. DCHR is considering creating an online position description library from which agency managers can select or adapt existing approved position descriptions to streamline the classification process. DCHR is also considering a computer system that would help agency managers select job elements to include in position descriptions.

Employees indicated that HR Advisors and agency managers frequently submit position descriptions that are incomplete or require extensive editing, which increases the time required to complete classification requests. Employees indicated that most HR Advisors and agency managers have not been trained in classification or drafting position descriptions. DCHR was planning to offer courses in the second half of FY 2007.

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<sup>58</sup> *Id.* at 39.

<sup>59</sup> DCHR report "Personnel Performance Measurement: Review and Analysis," (Feb. 27, 2004) at 6.

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Before agencies can submit vacancy announcements, new positions must be classified, and existing positions must be reviewed. Consequently, delays in classification postpone the rest of the hiring process, which is reflected in some HR Advisors' survey responses identifying untimely classification as a significant barrier to the hiring process.

### ***DCHR's Response, as Received:***

*Disagree. The DCHR makes every effort to meet agencies' expectations; however in many cases, the expectations are unreasonable. The Audit report stated that in Montgomery County, Maryland, it took an average of four (4) days in 2003 to classify newly created and vacant positions. The report fails to take into account that Montgomery County has a standard classification system which requires the County to only classify new or vacant positions. For all other positions, Montgomery County relies on county-wide classification specifications that do not change based on the hiring agency. The District government's reliance on the federal classification standards necessitates the creation of agency/individual employee-specific position descriptions, which almost triples the workload that would normally occur. A recent International City, County Management Association (ICMA) report indicates that cities of similar size to the District of Columbia may average five-hundred to six hundred (500 to 600) classifications (See Exhibit 9 page 323). Based on the data in the PeopleSoft system, the District government has more than double the number at over 1200 classifications. For this reason, the OIG comparison of the DCHR's ability to classify positions with Montgomery County, which works from a completely different set of standards, should be reconsidered.*

*On the issue of managing agencies' expectations, the DCHR is often called upon to "turn around" new classifications within one (1) day, with little documentation from the agency regarding changes in programs and job duties of positions, or poorly written position descriptions that do not adequately outline the agency's needs. Moreover, pressure by agencies in some cases to improperly grade positions at a higher level because the agency has already hired or promised a certain grade to an individual (also noted in Auditor's report) leads to frustration on the part of the DCHR classification staff and the agency for which the classification is being requested. These issues, coupled with the lack of classification and compensation staff (as documented in the Auditor's Report), has led to the perceived delays of classifications. The DCHR classification staff completes an average of 130 classifications per month, and each classification action, because of the review and edits the classifiers have to make because of the poor quality submissions by agencies, takes an average of four (4) hours per classification action/transaction.*

*Most agency officials lack a clear understanding of the steps necessary to conduct a good job analysis and the fact that it is a function that does not lend itself to taking shortcuts. Classifiers must look at current classification standards, internal and external equity issues, and investigate what new positions really will be doing and how they fit in the organization. For more in-depth analysis, the DCHR sometimes conducts on-site audits, has discussions with supervisors and employees regarding duties, and formats position descriptions to meet the needs of the agency and comply with the existing standards, while making sense in the total compensation and classification scheme of the city.*

## COMPENSATION AND CLASSIFICATION

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*On the issue of performance standards, the DCHR agrees that such standards did not exist prior to Mayor Fenty's Administration. However, since January 2007, DCHR classifiers are expected to complete at least two (2) to four (4) classifications per day if they are not "pulled off" to complete other special studies. The DCHR began tracking this output in May 2007. The DCHR is also placing more of the responsibility on the agencies to provide the DCHR with complete and accurate information on the classification requested for review. Based on data collected since May 2007, the DCHR finds that most classification actions (over fifty percent (50%)) reside in the agency because they have not supplied the necessary information or still need to sign the final documents.*

*One new measure the DCHR is instituting to speed up the classification process is the development of standard position descriptions to be housed in a database that can be accessed by HR Advisors and agency managers for the agencies the DCHR services.*

**OIG response: The OIG stands by the finding as stated. At the time of inspection, DCHR had not established timeframes for classification actions.**

### **Recommendations:**

- (1) That the D/DCHR establish and accurately track performance measures for the timeliness of classification actions.

Agree \_\_\_\_\_ **X** \_\_\_\_\_ Disagree \_\_\_\_\_

### ***DCHR's Response, as Received:***

*See response to question 16 [DCHR response to finding 16].*

- (2) That the D/DCHR ensure that the Classification Division has adequate staff to process classification actions timely.

Agree \_\_\_\_\_ **X** \_\_\_\_\_ Disagree \_\_\_\_\_

### ***DCHR's Response, as Received:***

*The DCHR has continuously recruited for qualified classifiers and has hired two (2) additional classifiers during fiscal year 2008. However, private sector employers as well as federal, state, and local governments are all experiencing difficulties in attracting and retaining qualified classifiers due to the specialization required for this position and the increase in demand. In the past years, the DCHR has requested additional funds for staffing enhancements and reform in this area. (See Exhibit 10)*

- (3) That the D/DCHR streamline the process of creating and classifying position descriptions.

Agree \_\_\_\_\_ **X** \_\_\_\_\_ Disagree \_\_\_\_\_

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### ***DCHR's Response, as Received:***

*See response to question 16 [DCHR response to finding 16]. Also, the DCHR submitted a RFP for a new classification system to the Office of Contracting and Procurement in January 2008. (See Exhibit 11)*

- (4) That the D/DCHR ensure that training in classification and drafting position descriptions is offered to HR Advisors and agency managers.

Agree \_\_\_\_\_ **X** \_\_\_\_\_ Disagree \_\_\_\_\_

### ***DCHR's Response, as Received:***

*As stated in response to question 1 (b) [DCHR response to finding 1b], the DCHR has expanded its curriculum to provide more HR classes for HR Specialists and agency HR Advisors to ensure that they understand the terms and functions of the District government's HR management system.*

### **17. DCHR sometimes classifies new positions at grades higher than appropriate.**

D.C. Code § 1-611.01 (Repl. 2006) states:

- (a) The classification of all positions in the Career, Educational, Legal, Excepted, and the Management Supervisory Services will be accomplished in accordance with the following policy:

- (1) Individual positions will be grouped and identified by classes and grades, in accordance with their duties, responsibilities, and qualification requirements and shall be indexed and cross referenced in the incumbent classification and compensation system; and  
(2) The principle of equal pay for substantially equal work will be supported.

- (b) The grade levels of all positions in the Career, Educational, Legal, Excepted, and the Management Supervisory Services shall be based on the consideration of applicable factors, such as knowledge and skills required by the positions; supervisory controls exercised over the work; guidelines used; complexity of the work; scope and effect of the work; personal contacts; purpose of contacts; physical demands of the positions; and work environment.

To classify a new position or reclassify an existing position, an agency submits a position description to the Classification Division of DCHR. Classifiers then assign a grade to that

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position based on federal OPM standards. The classifier and agency management both have to sign the cover sheet (Form OF-8) to finalize a position description.

Interviewees stated that agency managers have frequently requested that DCHR classify positions at higher grade levels than were justified by the initial position descriptions produced by the agencies. Interviewees identified assistant positions, such as staff assistants and special assistants, as frequently over-graded. Classifiers stated that if a position description can be adjusted to justify a higher grade, they work with the agency to produce one that is appropriate to the grade desired. For example, in an occupational series that contains a position at grade 11 and a position at grade 12, a position description could be revised to justify a grade 12 instead of a grade 11.

Interviewees also stated that previous DCHR managers usually supported requests to classify positions at higher grades, and occasionally instructed classifiers to do so when classifiers opposed increasing grades. In addition, interviewees stated that some District agency managers wanted to create positions at high grades for applicants whom they had pre-selected. According to DCHR employees, in the past the District lagged significantly behind pay for federal employees, resulting in the use of higher grades to increase employees' pay. However, interviewees stated that salary increases in FY 2006 significantly narrowed the pay disparity.

Interviewees stated that positions classified at grades higher than appropriate increase the District's personnel costs, and these positions may not fit logically within agencies' organizational structures.

### **Recommendation:**

That the D/DCHR ensure that classification standards are followed in grading positions.

Agree \_\_\_\_\_ **X** \_\_\_\_\_ Disagree \_\_\_\_\_

### ***DCHR's Response, as Received:***

*This statement is very true. This phenomenon did not happen overnight; but during the fiscally troublesome times, the classification system was used as a compensation tool, as there was a wide gap in salaries between other jurisdictions, organizations, and the federal government (See Exhibit 12). Fortunately, with the implementation of pay parity, there has been a decline in the request for grades higher than appropriate in general. This is still a problem in some agencies who as a result of reorganization seek to hire people in grades higher than what would be expected in the market place. In most instances, agencies attempt to bring in new employees based on compensation provided in the private sector or inflated internal comparisons. The DCHR continually urges agencies to conduct true market analysis using industry recognized tools for determining appropriate compensation packages.*

*A crucial factor that many people ignore is the concept of internal equity. Many agencies, including independent agencies, hire their own classifiers to create or sustain higher than expected classification levels for positions and individuals than what is appropriate. This*

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*“rogue classification” does little to help build a real system for the District government and creates pressure for the DCHR to match the incorrect grading of others with its own misclassification, thus exacerbating the problem. A real example is the grading of the HR Advisors. The HR Advisors are currently allocated to grade 14-15 levels in the agencies. However, the level of work performed by the HR Advisors is commensurate to the work of the DCHR HR Specialists currently classified at the grade levels 12 and 13. At grade levels 14 and 15, these classifications represent inflated grades for the duties of the positions and not even the centralized positions in the DCHR are allocated to those grades, except for subject-matter experts, managers, and Associate Directors. Additionally, most HR Advisors do not have delegated classification authority and are not professionally certified in HR.*

*The DCHR recommends that all classification functions be centralized, and that the District government stop competing against itself for talent. Agencies should not be allowed to misclassify positions in order to lure away employees from other District government agencies. Unnecessary expenditures due to misclassifications, and the cost associated with employee turnover, can be very expensive for an organization. The District is the only local government that has such a decentralized classification system, which has resulted in many problems, as outlined in the Auditor’s report.*

*Another aspect of the over-grading has occurred with the creation of the Labor Management Task Force on Compensation and Classification Reform. This group, established through collective bargaining, has given away management rights on classification. Basically, the unions have dictated classification reform, with resulting in studying positions and pressure to reclassify positions upward through the use of consultants reliant on District funding for continued operations. For example, in a study conducted during 2006, of the over 500 positions studied, not one position was downgraded. This is unheard of in classification studies and the city should prepare itself for the amount of downgrades that could be possible if a new classification system is actually implemented.*

**18. DCHR does not review positions routinely to ensure that they are properly classified.**

DPM §§ 1109.3 and 1109.4 state that positions are to be reviewed every 3 years:

1109.3 The D.C. Office of Personnel establishes policies for placement of positions in the appropriate class and grade level, investigates and reviews classification decisions of servicing personnel offices and determines the effectiveness with which the District Classification System is administered.

1109.4 The servicing personnel officers have general authority for administering the classification system with their respective clusters. This is accomplished either through individual desk audits, representative sampling of identical additional positions, or

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planned annual reviews of positions so that all positions are reviewed at least once in every three years.

Interviewees stated that the Classification Division is responsible for reviewing all positions under the personnel authority of the Mayor every 3 years to ensure they are accurately classified. This includes ensuring that positions have the correct title, series, and grade. Interviewees stated that the District no longer has servicing personnel offices in agency clusters and that this section of the DPM is outdated.

DCHR employees stated that the Classification Division does not routinely review positions and that many positions probably are misclassified. The team's review of 47 position descriptions for DCHR employees revealed that 43 percent had not been reviewed within the 3-year timeframe required. The Classification Division's review of positions is limited to reviewing positions prior to hiring and performing infrequent desk audits requested by employees or managers. Classifiers stated that job codes sometimes contain incorrect classification information, especially for positions that were not created recently.

According to interviewees, the Classification Division does not have adequate staff to review existing positions and that a contractor's September 2005 review of some positions was inadequate. The contractor reviewed positions in seven agencies and issued a report entitled *Employee Classification & Compensation Study: Final Report Phases I & II*. Classifiers stated that they were not satisfied with the quality of the contractor's work. The contractor reviewed 1,327 positions and recommended 93 positions for grade increases and none for grade decreases. The team observed that the methodology of this classification study was not adequate to identify positions that were over-graded. The contractor only reviewed positions in depth if employees or their managers stated that their position descriptions were not accurate or if the positions did not have position descriptions. This methodology is deficient because employees are unlikely to draw attention to potential over-grading in their positions, and interviewees stated that agency managers sometimes requested increased grades for positions in their agencies.

Failure to routinely review position descriptions has adverse consequences. According to interviewees, position descriptions should be reviewed because employees' duties may evolve and no longer be accurately reflected in their position descriptions, leading to discrepancies in employees' duties and their grades. Interviewees stated that DCHR sometimes classifies positions at inappropriately high grades at the request of agencies and that routine position review would serve as an internal control to counter hiring at inflated grades. Because DCHR does not routinely review positions, misclassified positions are not corrected. In addition, interviewees stated that employees may be terminated incorrectly during a reduction in force because position information could be inaccurate.

### ***DCHR's Response, as Received:***

*Agree. However, as agencies continue to fill positions and the three (3) year time limit approaches, the agency sends in "recertification requests" to the DCHR.*

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### Recommendations:

- (1) That the D/DCHR take steps to ensure that the Classification Division has adequate resources to review positions every 3 years.

Agree \_\_\_\_\_ **X** \_\_\_\_\_ Disagree \_\_\_\_\_

### *DCHR's Response, as Received:*

*The DCHR is currently reviewing the three-year (3-year) requirement and hopes that the new classification and compensation project will create a classification system with more manageable reviews under a system of 400-500 classifications.*

- (2) That the D/DCHR ensure that job codes for positions are adequately reviewed.

Agree \_\_\_\_\_ **X** \_\_\_\_\_ Disagree \_\_\_\_\_

### *DCHR's Response, as Received:*

*The DCHR, in collaboration with the Office of the Chief Technology Officer, will be conducting an extensive data clean-up of the PeopleSoft system.*

- (3) That the D/DCHR ensure that position reviews identify over-graded and under-graded positions.

Agree \_\_\_\_\_ **X** \_\_\_\_\_ Disagree \_\_\_\_\_

### **19. DCHR's lack of policies for open-range pay scales creates confusion for managers in implementation and opportunities for abuse.**

GAO best practices recommend that agencies ensure that “[a]ppropriate policies, procedures, techniques, and mechanisms exist with respect to each of the agency’s activities.”<sup>60</sup> D.C. Code § 1-604.04 (a) (Repl. 2006) requires the Mayor to issue rules and regulations to implement the District government’s personnel laws. This authority has been delegated to DCHR.

According to a DCHR memorandum dated March 27, 2007, DCHR did not develop pay-setting policies for open-range salary schedules prior to implementing them. In a system of open-range salary schedules, grades have minimum and maximum salaries with flexibility in setting employees’ pay between these points. Open-range salaries for Excepted Service employees became effective in July 2005. In March 2006, open-range salary schedules were put

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<sup>60</sup> Government Accountability Office, Internal Control Management and Evaluation Tool, GAO-01-1008G (Aug. 2001) at 34.

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in place for the MSS and Legal Service managers, and Career Service employees at and above grade 15 have open ranges for their salaries.<sup>61</sup>

According to interviewees, DCHR's Policy Division is drafting a policy issuance on setting pay for open-range salary schedules. However, interviewees stated that the issuance has been delayed due to understaffing.

Insufficient guidance due to the lack of policies increases the difficulty of implementing open-range salary schedules for agency managers. In the absence of policies, agencies can hire applicants at any point in the open ranges without justification, which creates opportunity for abuse. In contrast, pay scales with steps require that agencies show that candidates have superior qualifications to justify hiring them above a step 4, which provides a level of internal control over the salaries of new hires.<sup>62</sup> Having no policy for reviewing starting salaries for open-range positions allows agency managers to hire applicants at inflated salaries. A DCHR manager expressed concern that this may be inflating the District's personnel costs.

### **Recommendation:**

That the D/DCHR expeditiously issue policies for setting open-range salaries for newly hired MSS, Excepted Service, Career Service, and Legal Service employees.

Agree \_\_\_\_\_ Disagree     X    

### ***DCHR's Response, as Received:***

***Disagree.*** The DCHR issued DPM Instruction No. 11B-56, Setting-Pay Provisions for Positions Paid Under Open Range Salary Schedule, dated May 23, 2007, providing agencies with pay-setting provisions for open range salary schedules. (See Exhibit 13).

*Additionally, the DCHR has prepared a rulemaking approval resolution, and submitted it to the Council for approval.*

**OIG Response: The OIG stands by its recommendation as stated. At the time of inspection, DCHR had not issued policies for setting open-range salaries for newly hired MSS, Excepted Service, Career Service, and Legal Service employees. However, DCHR's action appears to meet the intent of the recommendation.**

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<sup>61</sup> Open range salaries for Executive Service employees took effect in 1998. DPM Instruction No. 10-8, Section 2d states, "A person appointed to a position in the Executive Service ... will receive a salary set at any amount within the salary range that the Mayor determines to be appropriate."

<sup>62</sup> DPM Instruction No. 11B-37 ¶ 5 states that all of the following criteria must be met for superior qualifications appointments: "(a) The special needs of the agency for the candidate's services; (b) The candidate's unusually high or unique qualifications for the positions, or the exceptional or highly specialized nature of his or her trade or craft, as applicable; and (c) The candidate's rate of basic pay."

## COMPENSATION AND CLASSIFICATION

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**Findings and  
Recommendations:**

**RECORDS MANAGEMENT**

**RECORDS MANAGEMENT**

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## RECORDS MANAGEMENT

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DCHR stores hiring documentation in merit case files and stores confidential employee records in OPFs. Each vacancy announcement has a merit case file that should provide complete documentation of how the hiring process was performed. For example, merit case files should include all applications received, documentation of how applicants were rated and ranked, and selection certificates listing candidates submitted to agencies. OPFs are official personnel folders for individual District employees and contain documentation of personnel actions such as hiring, termination, and benefits.

### **20. OPFs are not adequately tracked.**

Employees in DCHR's Records Management Administration track and maintain OPFs.<sup>63</sup> DPM § 3105.6 states, in part, "Documentation of the removal of records from the storage area shall be kept to ensure-- (a) That adequate control is maintained; and (b) That removed records are returned on a timely basis." Interviewees stated there have been instances when OPFs could not be readily located because they were in stacks to be filed, had been misfiled,<sup>64</sup> or employees had lent OPFs to other DCHR employees to use without notifying the Records Management Administration.

DCHR's Information Technology Administration and Records Management Administration are addressing these problems by implementing an electronic tracking system (OPUS 32) designed to monitor the location of OPFs. This system will replace the current process of recording the date and name of employees checking out OPFs into an MS Excel spreadsheet. Once OPUS 32 is fully operational, each OPF will be bar-coded so that it can be scanned in and out of the file room. The database will notify Records Management Administration employees when OPFs are overdue and who has possession of the file. Employees will also be able to locate misplaced OPFs with a tracking wand that alerts the operator when it is close to the desired OPF.

According to employees, DCHR is experiencing logistical delays in implementing OPUS. DCHR management stated that installation should have been complete by July 2007, and an Oracle database administrator is needed to expedite outstanding component integrations and negate network and communications problems. Interviewees also reported that additional staff is needed to enter data and label OPFs with bar codes. Successful implementation of OPUS will strengthen DCHR's internal controls for tracking OPFs.

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<sup>63</sup> The Records Management Unit monitors OPFs for non-Executive and Excepted Service employees. OPFs for that subset of employees are maintained separately within DCHR's Office of the Director.

<sup>64</sup> Occasionally, OPFs are misfiled because HR Specialists do not update OPF labels when employees transfer to another agency or change their names.

## RECORDS MANAGEMENT

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### **Recommendation:**

That the D/DCHR acquire sufficient staffing and resources to expedite complete implementation of OPUS 32.

Agree \_\_\_\_\_ **X** \_\_\_\_\_ Disagree \_\_\_\_\_

### ***DCHR's Response, as Received:***

*However, while there is room for improvement, the DCHR does have adequate methods in place to track the location of Official Personnel Folders (OPF). These methods include a sign-out log, restricted access and a tracking system for OPFs retired to St. Louis. To improve the effectiveness and efficiency of OPF tracking, as part of its fiscal year 2008 goals, the DCHR will ensure that OPUS 32 is fully operational.*

### **21. OPFs are not transported in a secure manner.**

DPM § 3100 states:

All official personnel records of the District Government shall be established, maintained, and disposed of in a manner designed to ensure the greatest degree of applicant or employee privacy while providing adequate, necessary, and complete information for the District to carry out its responsibilities under the District of Columbia Government Comprehensive Merit Personnel Act of 1978, D.C. Law 2-139, as amended[,] ... and other laws governing personnel management in the District of Columbia Government.

OPFs are routinely transported between buildings because employees who process OPFs are not located in the same office. However, DCHR has not developed written policies and procedures for securely transporting OPFs. DCHR employees stated that they place OPFs in unsealed, inter-office envelopes for the DCHR driver to transport.

Sensitive information and employee privacy may be compromised if OPFs are not transported in sealed packages. Consequently, employee privacy is not ensured as required by DPM regulations.

### **Recommendation:**

That the D/DCHR establish and implement written policies and procedures for transporting OPFs in a secure manner.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ **X** \_\_\_\_\_

## RECORDS MANAGEMENT

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### ***DCHR's Response, as Received:***

*OPFs are delivered via an internal courier only, who also is a DCHR employee. Additionally, upon delivery, a signature from the intended recipient is required. This creates a permanent record.*

**OIG Response: The OIG stands by its recommendation as stated. At the time of this inspection, the courier position was not filled and there was no written protocol for transporting OPFs in a secure manner.**

### **22. There is a backlog of documents to file in OPFs.**

The team observed five large boxes labeled “things to be filed” in the DCHR records room. A records room employee confirmed that these boxes were a backlog of documents to be filed in OPFs. DCHR staff stated that DCHR contracted with a temporary employment agency for 1 month in 2006 to eliminate the backlog, but that documents had accumulated since that time.

Interviewees stated that the Records Management Administration has insufficient staff to meet its responsibilities. The unit has two employees and two vacant positions. Records management employees stated that they spend the majority of their time responding to requests for verification of employment information by potential employers, lenders, and others.

Because some documents have not been filed, some OPFs are incomplete. Documents that have not been filed in OPFs are difficult to locate, hindering DCHR's ability to verify information to carry out its personnel responsibilities.

### **Recommendation:**

That the D/DCHR ensure that the Records Management Administration is staffed sufficiently to file all documents timely.

Agree                **X**                Disagree      \_\_\_\_\_

### ***DCHR's Response, as Received:***

*The DCHR manages over 25,000 OPFs, to that end, the DCHR has staffed two (2) additional FTEs in the area and will contract for the services of temporary employees to assist with the filing.*

**RECORDS MANAGEMENT**

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**APPENDICES**

## APPENDICES

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## APPENDICES

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- Appendix 1:** List of Findings and Recommendations
- Appendix 2:** MAR 07-I-009 with DCHR and DCRA Responses
- Appendix 3:** List of Exhibits Provided by DCHR in Response to the Draft Report of Inspection
- Appendix 4:** DCHR Hiring Process Survey and Response Rates, and HR Advisor Survey and Response Rates
- Appendix 5:** Flow Chart of DCHR’s Hiring Process
- Appendix 6:** Flow Chart of DCHR’s Panel Process
- Appendix 7:** DCHR Form 1249 “Merit Staffing Case File Checklist”

## APPENDICES

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**APPENDIX 1**

## APPENDICES

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## LIST OF FINDINGS AND RECOMMENDATIONS

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### Key Findings:

#### 1. **Internal controls are inadequate.**

- a. A number of policies and procedures need updating and revision to improve their accuracy and usefulness.*
- b. Job-specific training for HR Specialists and HR Advisors is inadequate.*
- c. DCHR does not adequately oversee the work of HR Specialists.*

- (1) That the D/DCHR comprehensively update the DPM and create written standard operating procedures to guide DCHR employees' duties and responsibilities.
- (2) That the D/DCHR ensure that internal controls are periodically assessed and updated.
- (3) That the D/DCHR ensure adequate oversight and quality assurance of the work performed by HR Specialists.
- (4) That the D/DCHR develop HR-specific training requirements and ensure that such training is taken.
- (5) That the D/DCHR ensure that HR training meets HR Advisors' needs.
- (6) That the D/DCHR consider offering more frequent and diversified methods of HR training for HR Advisors.

#### 2. **DCHR does not coordinate or facilitate drug testing for candidates and employees in youth services and other sensitive positions as required by law. Although DCHR coordinates background checks for agencies covered by the Child and Youth, Safety and Health Omnibus Amendment Act of 2004 (Act), it does not coordinate criminal background checks for agencies not covered by the Act.**

- a. Drug testing mandated by law for occupations providing direct services to children and youth is not coordinated with hiring agencies.*
- b. DCHR oversight and coordination of criminal background checks and drug testing for employees in sensitive positions do not extend to all agencies not covered by the Act.*

- (1) That the D/DCHR ensure that the Substance Abuse Unit coordinates with District agencies on conducting drug and alcohol testing for employees who are child or youth services providers as required by D.C. Law 15-353, the Child and Youth, Safety and Health Omnibus Amendment Act of 2004.

## LIST OF FINDINGS AND RECOMMENDATIONS

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- (2) That the D/DCHR coordinate with the Executive Office of the Mayor to confirm that DCHR has the authority to require that agencies under the Mayor's personnel authority, which are not covered by the Act, contract with a vendor to perform drug testing for sensitive positions and notify DCHR of the results.
- (3) That the D/DCHR develop and promulgate comprehensive written policies and procedures regarding the conduct of criminal background checks and drug testing for agencies under the Mayor's personnel authority, which are not covered by the Act.
- (4) That the D/DCHR ensure that verification of applicant and employee background checks and drug testing is maintained in DCHR records for review and retrieval.

3. **Inadequate advertising of vacancies and recruiting methods may result in fewer qualified applicants, particularly for specialized or technical positions.**

- (1) That the D/DCHR develop and implement written policies and procedures to expand recruiting strategies.
- (2) That the D/DCHR provide written advice to District agencies on recruitment options.
- (3) That the D/DCHR establish and track performance measures for recruiting.

4. **The application of residency and veterans' preferences is inconsistent and sometimes impedes the hiring process.**

- a. *Agencies indicate that residency preference requirements sometimes impede hiring qualified applicants.*
- b. *DCHR does not consistently apply points for residency and veterans' preferences.*

- (1) That the D/DCHR consider revising personnel requirements to permit agencies to interview candidates as part of the ranking process before they appear on the selection certificate.
- (2) That the D/DCHR ensure that HR Specialists properly apply residency preference and veterans' preference.
- (3) That the D/DCHR revise the DPM to include guidelines for DCHR's practice of granting residency preference waivers.

5. **DCHR has not been reporting to agency heads the residency status of residency preference employees as required by the DPM.**

## LIST OF FINDINGS AND RECOMMENDATIONS

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That the D/DCHR comply with policies and procedures for reporting the status of employees claiming residency preference.

6. **DCHR did not develop annual affirmative action plans as required by law.**

That the D/DCHR develop and publish an affirmative action plan in accordance with District laws and regulations.

7. **Positions requiring licenses are not always identified, and applicants' licenses are not always verified prior to their employment.**

- a. DCHR does not have processes in place to ensure that positions requiring licenses are identified.*
- b. DCHR's lack of classification standards for social work associate positions has led to a large number of unlicensed social work practitioners in the District.*
- c. DCHR lacks clear lines of responsibility for ensuring applicants have licenses for positions that require them.*

- (1) That the D/DCHR determine which District government positions require licensure and advise District agencies to ensure that all applicants selected for positions and employees meet any applicable licensure requirements.
- (2) That the D/DCHR develop and implement written policies and procedures to ensure that position descriptions and vacancy announcements contain applicable licensure requirements.
- (3) That the D/DCHR ensure that social work associate position classification standards are finalized expeditiously.
- (4) That the D/DCHR collaborate with HPLA to ensure that a thorough review of social work-related positions is conducted to ensure that licensure requirements are accurately identified.
- (5) That the D/DCHR develop and implement written standard operating procedures that establish who within DCHR is responsible for verifying licensure prior to hiring.
- (6) That the D/DCHR ensure that DCHR employees responsible for verifying licensure are knowledgeable about their responsibilities for this function.

8. **DCHR is not adequately staffed to carry out all of its tasks effectively.**

- (1) That the D/DCHR conduct a staffing analysis to determine which DCHR divisions are understaffed.

## LIST OF FINDINGS AND RECOMMENDATIONS

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- (2) That the D/DCHR, in order to improve the efficiency and timeliness of the District's hiring process, identify and implement strategies to more quickly fill vacant positions within DCHR.
- (3) That the D/DCHR, in order to mitigate the impact of DCHR's staffing deficiencies, and improve the efficiency and timeliness of the District's hiring process, explore the efficacy of allowing District agencies to assume duties normally performed by DCHR personnel, such as the receipt and screening of application packages.

### **Application and Selection:**

**9. The online application does not require vital background information.**

That the D/DCHR ensure that the online application requests the same background information from applicants as does the DC2000 hard copy application.

**10. Some OPFs lack documentation of employment suitability.**

That the D/DCHR ensure that documentation confirming that employees have undergone pre-employment background checks as stated in the DPM is stored in the appropriate files.

**11. Receipt of incomplete online applications may limit the pool of qualified applicants.**

That the D/DCHR, in conjunction with ASMP, conduct an assessment of the online application process to determine why online applications are often incomplete, and work to resolve the problem expeditiously.

**12. Internal controls for receiving and tracking applications are inadequate.**

That the D/DCHR strengthen internal controls to ensure that employment applications are properly accounted for from the point of receipt to filing in the respective merit case file.

**13. Monitoring of the ranking panel process is inconsistent.**

- (1) That the D/DCHR establish written policies and procedures for monitoring ranking panels and conducting interviews as part of the ranking process.
- (2) That the D/DCHR ensure that HR Specialists and District agencies are trained on the use of ranking panels.

**14. Policies and procedures for maintenance of merit case files are not followed.**

That the D/DCHR ensure that employees comply fully with the Merit Staffing Plan's requirements for maintaining all records related to candidate selection.

## LIST OF FINDINGS AND RECOMMENDATIONS

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### Compensation and Classification:

15. **The compensation and classification systems are outdated and contribute to recruitment problems.**

That the D/DCHR develop and implement a plan for compensation and classification reform based on best practices in other jurisdictions such as Fairfax and Montgomery Counties and the District's HR needs.

16. **The classification process does not meet agencies' expectations for timeliness, and DCHR does not have performance measures for the timeliness of classification actions.**

- (1) That the D/DCHR establish and accurately track performance measures for the timeliness of classification actions.
- (2) That the D/DCHR ensure that the Classification Division has adequate staff to process classification actions timely.
- (3) That the D/DCHR streamline the process of creating and classifying position descriptions.
- (4) That the D/DCHR ensure that training in classification and drafting position descriptions is offered to HR Advisors and agency managers.

17. **DCHR sometimes classifies new positions at grades higher than appropriate.**

That the D/DCHR ensure that classification standards are followed in grading positions.

18. **DCHR does not review positions routinely to ensure that they are properly classified.**

- (1) That the D/DCHR take steps to ensure that the Classification Division has adequate resources to review positions every 3 years.
- (2) That the D/DCHR ensure that job codes for positions are adequately reviewed.
- (3) That the D/DCHR ensure that position reviews identify over-graded and under-graded positions.

19. **DCHR's lack of policies for open-range pay scales creates confusion for managers in implementation and opportunities for abuse.**

That the D/DCHR expeditiously issue policies for setting open-range salaries for newly hired MSS, Excepted Service, Career Service, and Legal Service employees.

## LIST OF FINDINGS AND RECOMMENDATIONS

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### Records Management:

**20. OPFs are not adequately tracked.**

That the D/DCHR acquire sufficient staffing and resources to expedite complete implementation of OPUS 32.

**21. OPFs are not transported in a secure manner.**

That the D/DCHR establish and implement written policies and procedures for transporting OPFs in a secure manner.

**22. There is a backlog of documents to file in OPFs**

That the D/DCHR ensure that the Records Management Administration is staffed sufficiently to file all documents timely.

**APPENDIX 2**

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The complete Management Alert Report (MAR-07-I-009) and agency responses regarding the exemption of District employees from engineering licensure requirements are available on the OIG website at <http://www.oig.dc.gov/news/newsLister2.asp?archived=0&mode=iande&month=20083>.

**APPENDIX 3**

## APPENDICES

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### **List of Exhibits Provided by DCHR** **In Response to the Draft Report of Inspection** **January 31, 2008**

1. DCHR, Policy and Planning Administration, List of Processes, Policies and Procedures, Implemented as of January 2007
2. Sample Recruitment Plan
3. Recruitment & Selection General Information Guide memorandum, dated January 11, 2008
4. Personnel Performance Measurement: Review and Analysis, dated February 27, 2004
5. Bureau of National Affairs Report and DCHR Ratio Analysis
6. DCHR Administrative Order AO-07-13, Guidelines for Pre-Employment Inquiries on New Appointments, dated December 11, 2007
7. Society for Human Resources Management & World at Work News Articles
8. D.C. Office of Personnel, Classification/Compensation and Performance Evaluation Systems, Competitive Assessment: Summary of Benchmarking/Best Practices Survey, dated July 17, 1999; D.C. Office of Personnel, Revised Compensation and Classification Report, dated January 31, 2000; and Carlson & Dettmann Consulting memorandum, dated December 29, 2007
9. ICMA Best Practices Data
10. FY 2007 Through FY 2009 Budget Enhancement Requests DCOP – Compensation Unit
11. 2008 Request for Proposal – New Classification System
12. Government of the District of Columbia D.C. Office Personnel, Briefing on District Compensation Issues, dated September 10, 2004, and FY 06 Non-Union Pay Parity Presentation dated June 27, 2006
13. DPM Instruction No. 11B-56, Setting-Pay Provisions for Positions Paid Under *Open Range* Salary Schedule, dated May 23, 2007

**APPENDIX 4**

APPENDICES



Office of the Inspector General  
Inspections and Evaluations Division

DC OFFICE OF PERSONNEL  
HIRING PROCESS SURVEY

**Purpose:** This survey is designed to obtain your opinions about the District of Columbia Office of Personnel’s (DCOP) customer service and hiring process. The survey uses the term “DCOP hiring staff” to refer to all DCOP employees involved in the hiring process.

Use the following legend in answering the survey items. If you do not have experience with or knowledge of an item, please mark “Not Applicable.” Write any comments on the reverse side, referencing the corresponding numbered items. You may also attach separate sheets with comments. Your comments will remain confidential, so be as candid as possible and feel free to address any issue not covered by the survey.

**ALL SURVEYS SHOULD BE RETURNED TO THE OFFICE OF THE INSPECTOR GENERAL NO LATER THAN FRIDAY, MARCH 16, 2007.**

You may return your survey by placing it in the drop box in the employee lounge on the 4<sup>th</sup> Floor of the Reeves Center, the drop box at 330 South (reception area) in Judiciary Square, or mailing it to the address below.

Inspections and Evaluations Division  
Office of the Inspector General  
717 14th Street, NW, 5th Floor  
Washington, DC 20005

| Statement   | Strongly Agree | Agree | Disagree | Strongly Disagree | Not Applicable | No Response |
|---|----------------|-------|----------|-------------------|----------------|-------------|
| 1. I have a clear understanding of my duties and responsibilities.                    |                |       |          |                   |                |             |
| 2. There are written policies to cover all aspects of my duties and responsibilities. |                |       |          |                   |                |             |
| 3. There are standardized procedures for reviewing my work.                           |                |       |          |                   |                |             |
| 4. Assignments are fairly distributed and are manageable.                             |                |       |          |                   |                |             |
| 5. I receive annual performance evaluations.  |                |       |          |                   |                |             |

## APPENDICES

| Statement  | Strongly Agree | Agree | Disagree | Strongly Disagree | Not Applicable | No Response |
|--|----------------|-------|----------|-------------------|----------------|-------------|
| 6. DCOP has published EEO policies in public places for employees to have ready access.  |                |       |          |                   |                |             |
| 7. There is effective communication between HR Advisors and DCOP hiring staff.   |                |       |          |                   |                |             |
| 8. Merit case files are well organized.  |                |       |          |                   |                |             |
| 9. I receive Official Personnel Files soon after I request them.   |                |       |          |                   |                |             |
| 10. DCOP adequately reviews position descriptions.   |                |       |          |                   |                |             |
| 11. DCOP adequately reviews job codes for new position descriptions.   |                |       |          |                   |                |             |
| 12. HR Advisors correctly select job codes for position descriptions.  |                |       |          |                   |                |             |
| 13. Job announcements are posted online in a timely manner.  |                |       |          |                   |                |             |
| 14. Customer service specialists ensure that merit case files contain all necessary documentation from walk-in and mail-in applicants. |                |       |          |                   |                |             |
| 15. DCOP processes online/electronic applications in a timely manner.  |                |       |          |                   |                |             |
| 16. DCOP processes paper/hard-copy applications in a timely manner.  |                |       |          |                   |                |             |
| 17. There have been instances when DCOP has lost applicant paperwork.  |                |       |          |                   |                |             |

## APPENDICES

| Statement   | Strongly Agree | Agree | Disagree | Strongly Disagree | Not Applicable | No Response |
|---|----------------|-------|----------|-------------------|----------------|-------------|
| 18. DCOP consistently submits qualified applicants to hiring managers for review.                     |                |       |          |                   |                |             |
| 19. DCOP provides agency hiring officials with complete information to use when assessing applicants. |                |       |          |                   |                |             |
| 20. DCOP's online hiring process at least as efficient as the paper-based process.                    |                |       |          |                   |                |             |
| 21. DCOP properly applies residency preference rules when screening applicants.                       |                |       |          |                   |                |             |
| 22. DCOP verifies that reference checks were conducted.   |                |       |          |                   |                |             |
| 23. DCOP verifies that educational credentials were verified.   |                |       |          |                   |                |             |
| 24. DCOP verifies that prior work experience was verified.  |                |       |          |                   |                |             |

### Additional Questions

25. What should be improved in DCOP's hiring process?
26. Who conducts criminal background checks for applicants?
27. Please describe the HR training you have received and identify the source of that training (from DCOP, on-the-job training, etc.).
28. Do you have adequate resources to do your job? Please explain.
29. Who is the DCOP Equal Employment Opportunity (EEO) Officer?

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30. Who are the DCOP Equal Employment Opportunity (EEO) Counselors?
31. Are you aware of any instances of fraud, waste, or abuse? Please describe.

**Additional Comments:**

## APPENDICES

The following table includes response rates for the Office of Personnel Hiring Process survey.

| Statement   | Strongly Agree      | Agree | Disagree | Strongly Disagree | Not Applicable | No Response |
|---|---------------------|-------|----------|-------------------|----------------|-------------|
| 1. I have a clear understanding of my duties and responsibilities.                      | 60.4% <sup>65</sup> | 31.3% | 6.3%     | 2.1%              | 0.0%           | 0.0%        |
| 2. There are written policies to cover all aspects of my duties and responsibilities.   | 25.0%               | 33.3% | 29.2%    | 8.3%              | 0.0%           | 4.2%        |
| 3. There are standardized procedures for reviewing my work.                             | 20.8%               | 33.3% | 29.2%    | 4.2%              | 6.3%           | 6.3%        |
| 4. Assignments are fairly distributed and are manageable.                               | 16.7%               | 31.3% | 31.3%    | 16.7%             | 4.2%           | 0.0%        |
| 5. I receive annual performance evaluations.  | 22.9%               | 50.0% | 6.3%     | 2.1%              | 16.7%          | 2.1%        |
| 6. DCOP has published EEO policies in public places for employees to have ready access. | 14.6%               | 43.8% | 16.7%    | 4.2%              | 12.5%          | 8.3%        |
| 7. There is effective communication between HR Advisors and DCOP hiring staff.          | 18.8%               | 37.5% | 14.6%    | 4.2%              | 20.8%          | 4.2%        |
| 8. Merit case files are well organized.   | 12.5%               | 25.0% | 10.4%    | 12.5%             | 37.5%          | 2.1%        |
| 9. I receive Official Personnel Files soon after I request them.                        | 6.3%                | 39.6% | 20.8%    | 6.3%              | 27.1%          | 0.0%        |
| 10. DCOP adequately reviews position descriptions.                                      | 14.6%               | 31.3% | 18.8%    | 6.3%              | 27.1%          | 2.1%        |
| 11. DCOP adequately reviews job codes for new position descriptions.                    | 12.5%               | 27.1% | 16.7%    | 6.3%              | 31.2%          | 6.3%        |
| 12. HR Advisors correctly select job codes for position descriptions.                   | 4.2%                | 20.8% | 22.9%    | 12.5%             | 39.6%          | 0.0%        |

<sup>65</sup> Percentages may not equal exactly 100% due to rounding. See footnote 7.

## APPENDICES

| Statement  | Strongly Agree | Agree | Disagree | Strongly Disagree | Not Applicable | No Response |
|--|----------------|-------|----------|-------------------|----------------|-------------|
| 13. Job announcements are posted online in a timely manner.  | 20.8%          | 29.2% | 6.3%     | 0.0%              | 41.7%          | 2.0%        |
| 14. Customer service specialists ensure that merit case files contain all necessary documentation from walk-in and mail-in applicants. | 8.3%           | 29.2% | 10.4%    | 6.3%              | 45.8%          | 0.0%        |
| 15. DCOP processes online/electronic applications in a timely manner.  | 14.6%          | 31.3% | 6.3%     | 2.1%              | 45.8%          | 0.0%        |
| 16. DCOP processes paper/hard-copy applications in a timely manner.  | 14.6%          | 31.3% | 8.3%     | 2.1%              | 41.7%          | 2.1%        |
| 17. There have been instances when DCOP has lost applicant paperwork.  | 8.3%           | 29.2% | 8.3%     | 2.1%              | 50.0%          | 2.1%        |
| 18. DCOP consistently submits qualified applicants to hiring managers for review.  | 25.0%          | 27.1% | 2.1%     | 4.2%              | 39.6%          | 2.1%        |
| 19. DCOP provides agency hiring officials with complete information to use when assessing applicants.                                  | 16.7%          | 25.0% | 8.3%     | 0.0%              | 50.0%          | 0.0%        |
| 20. DCOP's online hiring process at least as efficient as the paper-based process.   | 2.1%           | 14.6% | 27.1%    | 8.3%              | 47.9%          | 0.0%        |
| 21. DCOP properly applies residency preference rules when screening applicants.  | 22.9%          | 22.9% | 8.3%     | 4.2%              | 37.5%          | 4.2%        |
| 22. DCOP verifies that reference checks were conducted.  | 14.6%          | 20.8% | 14.6%    | 2.1%              | 43.7%          | 4.2%        |
| 23. DCOP verifies that educational credentials were verified.  | 18.8%          | 16.7% | 10.4%    | 4.2%              | 45.8%          | 4.2%        |

## APPENDICES

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| Statement  | Strongly Agree | Agree | Disagree | Strongly Disagree | Not Applicable | No Response |
|--|----------------|-------|----------|-------------------|----------------|-------------|
| 24. DCOP verifies that prior work experience was verified. | 12.5%          | 27.1% | 10.4%    | 4.2%              | 43.7%          | 2.1%        |

## APPENDICES

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### Office of the Inspector General Inspections and Evaluations Division

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#### DC AGENCY HUMAN RESOURCE ADVISORS SURVEY

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**Purpose:** This survey is designed to obtain your opinions about the District of Columbia Office of Personnel's (DCOP) customer service and hiring process. The survey uses the term "DCOP hiring staff" to refer to all DCOP employees involved in the hiring process.

**Use the following legend in answering the survey items. If you do not have experience with or knowledge of an item, please mark "Not Applicable." Write any comments on the reverse side, referencing the corresponding numbered items. You may also attach separate sheets with comments. Your comments will remain confidential, so be as candid as possible and feel free to address any issue not covered by the survey.**

**ALL SURVEYS SHOULD BE RETURNED TO THE OFFICE OF THE INSPECTOR GENERAL NO LATER THAN FRIDAY, MARCH 9, 2007.**

**You may return your survey by any of the options below.**

1. Email your completed survey. To respond via the body of an email, hit "Reply." Then type an x in the box of your answer and type your responses to the open-ended questions. You may also download the attachment, complete and save the survey, and then attach it to an email.
2. Fax.
3. Return the survey in person to the address below.
4. Send via interdepartmental mail or U.S. mail to:  
Inspections and Evaluations Division  
Office of the Inspector General  
717 14th Street, NW, 5th Floor  
Washington, DC 20005

If you are concerned about anonymity, please note that using U.S. mail will guarantee that the Office of the Inspector General will have no way of identifying you or your agency.

**PLEASE READ THE SURVEY COMPLETELY BEFORE ANSWERING QUESTIONS.**

## APPENDICES

| Statement  | Strongly Agree | Agree | Disagree | Strongly Disagree | Not Applicable | No Answer |
|--|----------------|-------|----------|-------------------|----------------|-----------|
| 1. I have a clear understanding of my Human Resource (HR) duties and responsibilities. |                |       |          |                   |                |           |
| 2. I have received adequate training to carry out my HR responsibilities.              |                |       |          |                   |                |           |
| 3. There are written policies to cover key aspects of my duties and responsibilities.  |                |       |          |                   |                |           |
| 4. There are standardized procedures for reviewing my work.                            |                |       |          |                   |                |           |
| 5. I receive annual performance evaluations on my HR duties.                           |                |       |          |                   |                |           |
| 6. There is effective communication with the DCOP hiring staff.                        |                |       |          |                   |                |           |
| 7. My overall experience with DCOP processing my new hires has been positive.          |                |       |          |                   |                |           |
| 8. DCOP's hiring process is efficient.   |                |       |          |                   |                |           |
| 9. DCOP's hiring staff provides complete and accurate information.                     |                |       |          |                   |                |           |
| 10. DCOP's website is a useful source for information.                                 |                |       |          |                   |                |           |
| 11. DCOP completes the hiring process in a timely manner.                              |                |       |          |                   |                |           |
| 12. DCOP hiring staff quickly follows up on my problems and questions.                 |                |       |          |                   |                |           |
| 13. DCOP staff provides thorough answers to my questions.                              |                |       |          |                   |                |           |

## APPENDICES

| Statement  | Strongly Agree | Agree | Disagree | Strongly Disagree | Not Applicable | No Answer |
|--|----------------|-------|----------|-------------------|----------------|-----------|
| 14. DCOP treats District agencies fairly/equally.  |                |       |          |                   |                |           |
| 15. I have received adequate training in creating new position descriptions.   |                |       |          |                   |                |           |
| 16. I have received adequate training in selecting job codes.  |                |       |          |                   |                |           |
| 17. Job codes are organized in a manner that allows me to easily identify the appropriate one for position descriptions. |                |       |          |                   |                |           |
| 18. Job announcements are posted online in a timely manner.  |                |       |          |                   |                |           |
| 19. DCOP vacancy announcements provide accurate and detailed descriptions of the vacancy.                                |                |       |          |                   |                |           |
| 20. DCOP has developed special recruiting strategies for hard to fill positions within my agency.                        |                |       |          |                   |                |           |
| 21. DCOP processes online/electronic applications in a timely manner.  |                |       |          |                   |                |           |
| 22. DCOP processes paper/hard-copy applications in a timely manner.  |                |       |          |                   |                |           |
| 23. There have been instances when DCOP has lost applicant paperwork.  |                |       |          |                   |                |           |
| 24. DCOP submits unqualified applicants to hiring managers for review.   |                |       |          |                   |                |           |

## APPENDICES

| Statement   | Strongly Agree | Agree | Disagree | Strongly Disagree | Not Applicable | No Answer |
|---|----------------|-------|----------|-------------------|----------------|-----------|
| 25. DCOP's applicant screening process effectively identifies qualified candidates.                   |                |       |          |                   |                |           |
| 26. DCOP provides agency hiring officials with complete information to use when assessing applicants. |                |       |          |                   |                |           |
| 27. DCOP's online hiring process is at least as efficient than its paper-based process.               |                |       |          |                   |                |           |
| 28. DCOP maintains a register of displaced employees.   |                |       |          |                   |                |           |
| 29. I refer to a register of displaced employee when recruiting for job vacancies.                    |                |       |          |                   |                |           |
| 30. DCOP properly applies residency preference rules when screening applicants.                       |                |       |          |                   |                |           |
| 31. Reference checks for new hires are always conducted.  |                |       |          |                   |                |           |
| 32. There are policies and procedures in place for conducting reference checks.                       |                |       |          |                   |                |           |
| 33. I have received training on how to conduct reference checks.                                      |                |       |          |                   |                |           |
| 34. Verification of educational credentials for new hires is always conducted.                        |                |       |          |                   |                |           |
| 35. There are policies and procedures in place for verifying educational credentials.                 |                |       |          |                   |                |           |

## APPENDICES

| Statement   | Strongly Agree | Agree | Disagree | Strongly Disagree | Not Applicable | No Answer |
|---|----------------|-------|----------|-------------------|----------------|-----------|
| 36. There are policies and procedures in place for verifying prior work experience. |                |       |          |                   |                |           |
| 37. I have received training on how to verify prior work experience.                |                |       |          |                   |                |           |
| 38. Verification of prior work experience for new hires is always conducted.        |                |       |          |                   |                |           |

### **Additional Questions**

**39. What should be improved in DCOP's hiring process?**

**40. Who conducts criminal background checks for applicants?**

**41. Please describe the HR training you have received and identify the source of that training (from DCOP, on-the-job training, etc.).**

**42. How has DCOP's performance in hiring affected your agency?**

**43. Please list any problems, concerns, or activities that need an immediate response from DCOP's hiring staff.**

**44. Are you aware of any instances of fraud, waste or abuse? Please describe.**

**Additional Comments:**

## APPENDICES

The following table includes response rates for the HR Advisor Survey.

| Statement  | Strongly Agree      | Agree | Disagree | Strongly Disagree | Not Applicable | No Answer |
|--|---------------------|-------|----------|-------------------|----------------|-----------|
| 1. I have a clear understanding of my Human Resource (HR) duties and responsibilities. | 35.3% <sup>66</sup> | 41.2% | 17.6%    | 0.0%              | 2.9%           | 2.9%      |
| 2. I have received adequate training to carry out my HR responsibilities.              | 26.5%               | 38.2% | 26.5%    | 5.9%              | 2.9%           | 0.0%      |
| 3. There are written policies to cover key aspects of my duties and responsibilities.  | 17.6%               | 52.9% | 11.8%    | 5.9%              | 5.9%           | 5.9%      |
| 4. There are standardized procedures for reviewing my work.                            | 11.8%               | 32.4% | 26.5%    | 8.8%              | 11.8%          | 8.8%      |
| 5. I receive annual performance evaluations on my HR duties.                           | 29.4%               | 26.5% | 8.8%     | 5.9%              | 20.6%          | 8.8%      |
| 6. There is effective communication with the DCOP hiring staff.                        | 11.8%               | 32.4% | 41.2%    | 5.9%              | 2.9%           | 5.9%      |
| 7. My overall experience with DCOP processing my new hires has been positive.          | 8.8%                | 41.2% | 35.3%    | 8.8%              | 5.9%           | 0.0%      |
| 8. DCOP's hiring process is efficient.   | 5.9%                | 20.6% | 38.2%    | 20.6%             | 5.9%           | 8.8%      |
| 9. DCOP's hiring staff provides complete and accurate information.                     | 2.9%                | 23.5% | 41.2%    | 11.8%             | 8.8%           | 11.8%     |
| 10. DCOP's website is a useful source for information.                                 | 23.5%               | 50.0% | 5.9%     | 8.8%              | 2.9%           | 8.8%      |
| 11. DCOP completes the hiring process in a timely manner.                              | 11.8%               | 23.5% | 29.4%    | 20.6%             | 8.8%           | 5.9%      |

<sup>66</sup> Percentages may not equal exactly 100% due to rounding.

## APPENDICES

| Statement  | Strongly Agree | Agree | Disagree | Strongly Disagree | Not Applicable | No Answer |
|--|----------------|-------|----------|-------------------|----------------|-----------|
| 12. DCOP hiring staff quickly follows up on my problems and questions.   | 5.9%           | 41.2% | 29.4%    | 17.6%             | 0.0%           | 5.9%      |
| 13. DCOP staff provides thorough answers to my questions.  | 5.9%           | 38.2% | 35.3%    | 11.8%             | 0.0%           | 8.8%      |
| 14. DCOP treats District agencies fairly/equally.  | 5.9%           | 32.4% | 14.7%    | 14.7%             | 20.6%          | 11.8%     |
| 15. I have received adequate training in creating new position descriptions.   | 2.9%           | 23.5% | 35.3%    | 14.7%             | 14.7%          | 8.8%      |
| 16. I have received adequate training in selecting job codes.  | 5.9%           | 26.5% | 32.4%    | 8.8%              | 23.5%          | 2.9%      |
| 17. Job codes are organized in a manner that allows me to easily identify the appropriate one for position descriptions. | 8.8%           | 26.5% | 35.3%    | 11.8%             | 11.8%          | 5.9%      |
| 18. Job announcements are posted online in a timely manner.  | 11.8%          | 50.0% | 20.6%    | 5.9%              | 5.9%           | 5.9%      |
| 19. DCOP vacancy announcements provide accurate and detailed descriptions of the vacancy.                                | 14.7%          | 73.5% | 2.9%     | 2.9%              | 5.9%           | 0.0%      |
| 20. DCOP has developed special recruiting strategies for hard to fill positions within my agency.                        | 2.9%           | 11.8% | 26.5%    | 26.5%             | 29.4%          | 2.9%      |
| 21. DCOP processes online/electronic applications in a timely manner.  | 5.9%           | 23.5% | 29.4%    | 5.9%              | 29.4%          | 5.9%      |
| 22. DCOP processes paper/hard-copy applications in a timely manner.  | 2.9%           | 26.5% | 35.3%    | 14.7%             | 14.7%          | 5.9%      |

## APPENDICES

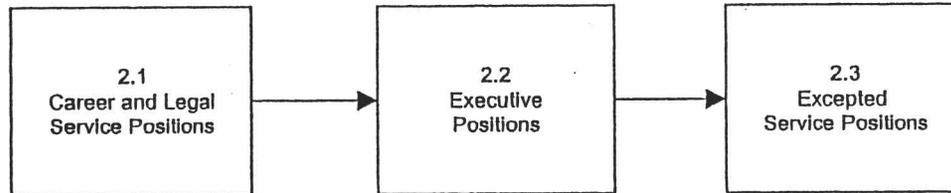
| Statement   | Strongly Agree | Agree | Disagree | Strongly Disagree | Not Applicable | No Answer |
|---|----------------|-------|----------|-------------------|----------------|-----------|
| 23. There have been instances when DCOP has lost applicant paperwork.                                 | 20.6%          | 38.2% | 8.8%     | 8.8%              | 17.6%          | 5.9%      |
| 24. DCOP submits unqualified applicants to hiring managers for review.                                | 11.8%          | 20.6% | 35.3%    | 8.8%              | 11.8%          | 11.8%     |
| 25. DCOP's applicant screening process effectively identifies qualified candidates.                   | 2.9%           | 17.6% | 35.3%    | 11.8%             | 20.6%          | 11.8%     |
| 26. DCOP provides agency hiring officials with complete information to use when assessing applicants. | 0.0%           | 44.1% | 20.6%    | 11.8%             | 17.6%          | 5.9%      |
| 27. DCOP's online hiring process is at least as efficient than its paper-based process.               | 5.9%           | 26.5% | 26.5%    | 14.7%             | 17.6%          | 8.8%      |
| 28. DCOP maintains a register of displaced employees.   | 2.9%           | 32.4% | 2.9%     | 0.0%              | 47.1%          | 14.7%     |
| 29. I refer to a register of displaced employee when recruiting for job vacancies.                    | 2.9%           | 11.8% | 17.6%    | 5.9%              | 50.0%          | 11.8%     |
| 30. DCOP properly applies residency preference rules when screening applicants.                       | 14.7%          | 58.8% | 11.8%    | 5.9%              | 8.8%           | 0.0%      |
| 31. Reference checks for new hires are always conducted.  | 14.7%          | 41.2% | 11.8%    | 0.0%              | 11.8%          | 20.6%     |
| 32. There are policies and procedures in place for conducting reference checks.                       | 2.9%           | 50.0% | 11.8%    | 2.9%              | 17.6%          | 14.7%     |
| 33. I have received training on how to conduct reference checks.                                      | 2.9%           | 11.8% | 50.0%    | 11.8%             | 17.6%          | 5.9%      |

## APPENDICES

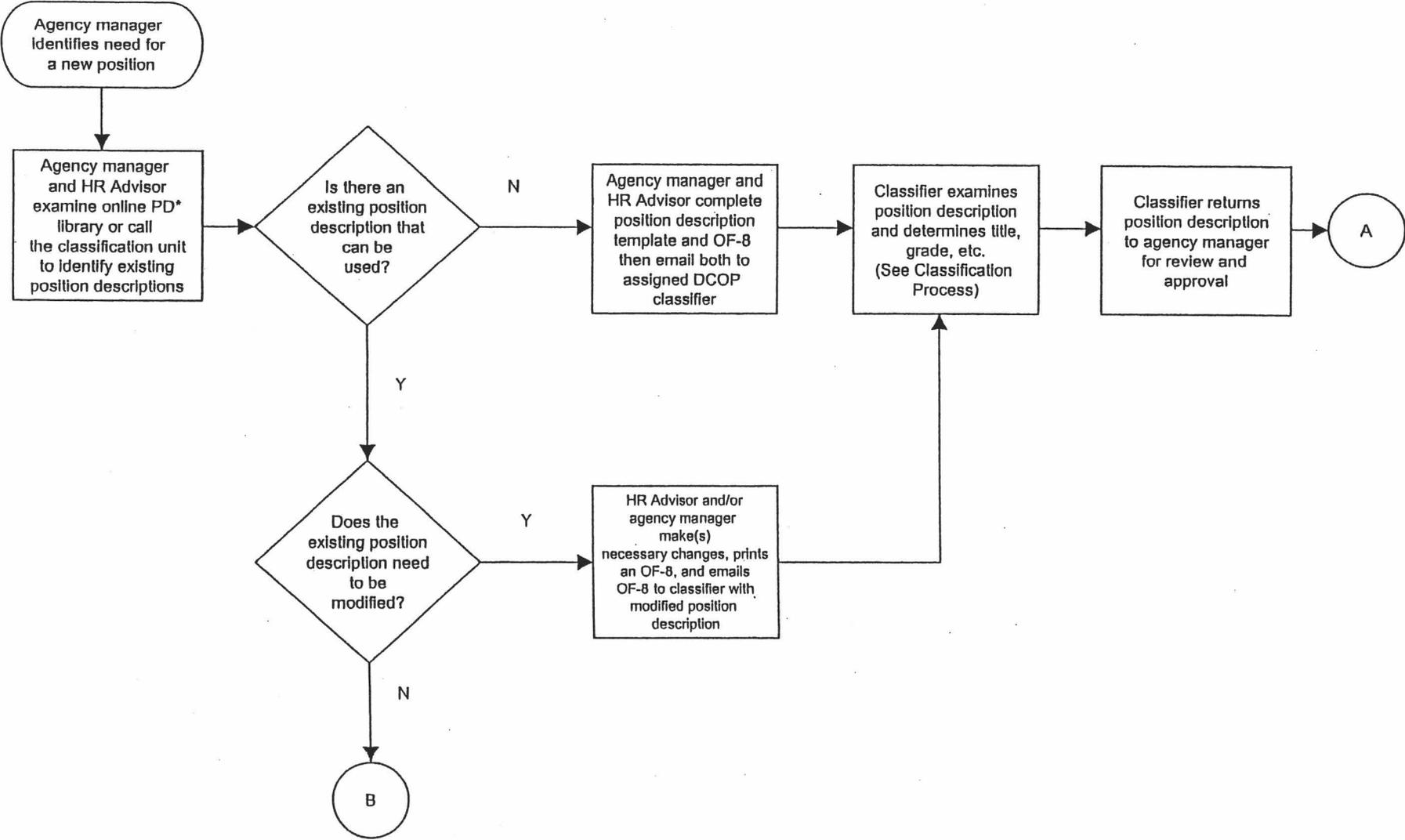
| Statement   | Strongly Agree | Agree | Disagree | Strongly Disagree | Not Applicable | No Answer |
|---|----------------|-------|----------|-------------------|----------------|-----------|
| 34. Verification of educational credentials for new hires is always conducted.        | 2.9%           | 23.5% | 26.5%    | 5.9%              | 23.5%          | 17.6%     |
| 35. There are policies and procedures in place for verifying educational credentials. | 2.9%           | 26.5% | 17.6%    | 5.9%              | 26.5%          | 20.6%     |
| 36. There are policies and procedures in place for verifying prior work experience.   | 5.9%           | 41.2% | 8.8%     | 2.9%              | 20.6%          | 20.6%     |
| 37. I have received training on how to verify prior work experience.                  | 2.9%           | 23.5% | 50.0%    | 5.9%              | 14.7%          | 2.9%      |
| 38. Verification of prior work experience for new hires is always conducted.          | 8.8%           | 41.2% | 11.8%    | 2.9%              | 23.5%          | 11.8%     |

**APPENDIX 5**

## 2.0 Recruit and Hire

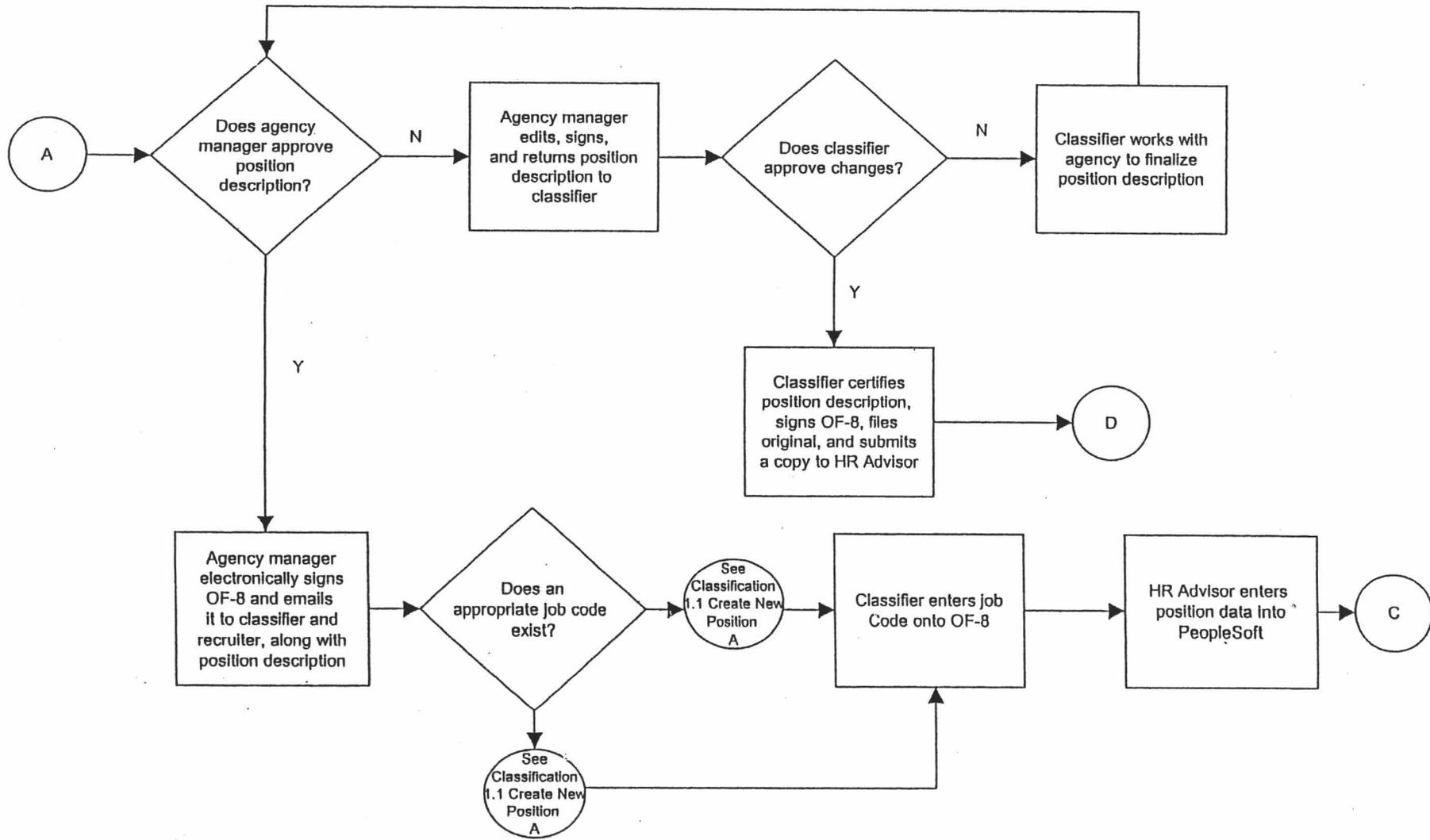


# 2.1 Career and Legal Service Positions



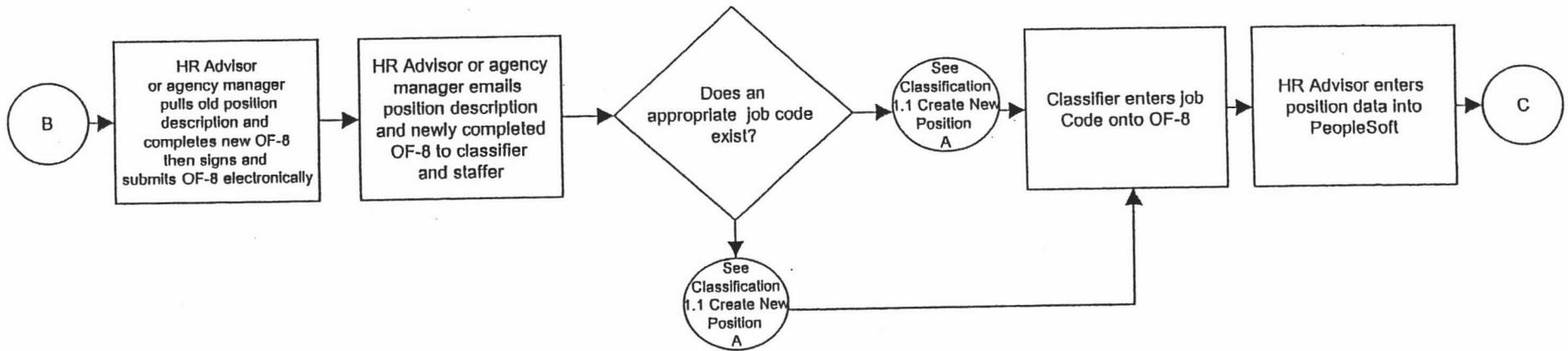
Note(s): \* Functionally not yet available, or new activity  
 - See position classification process for more details

## 2.1 Career and Legal Service Positions



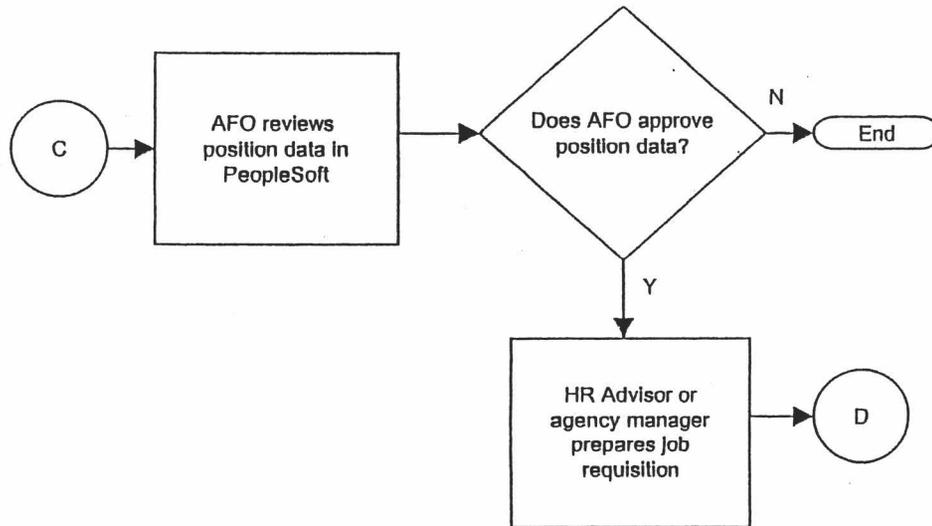
Note(s): \* New process or functionality

## 2.1 Career and Legal Service Positions

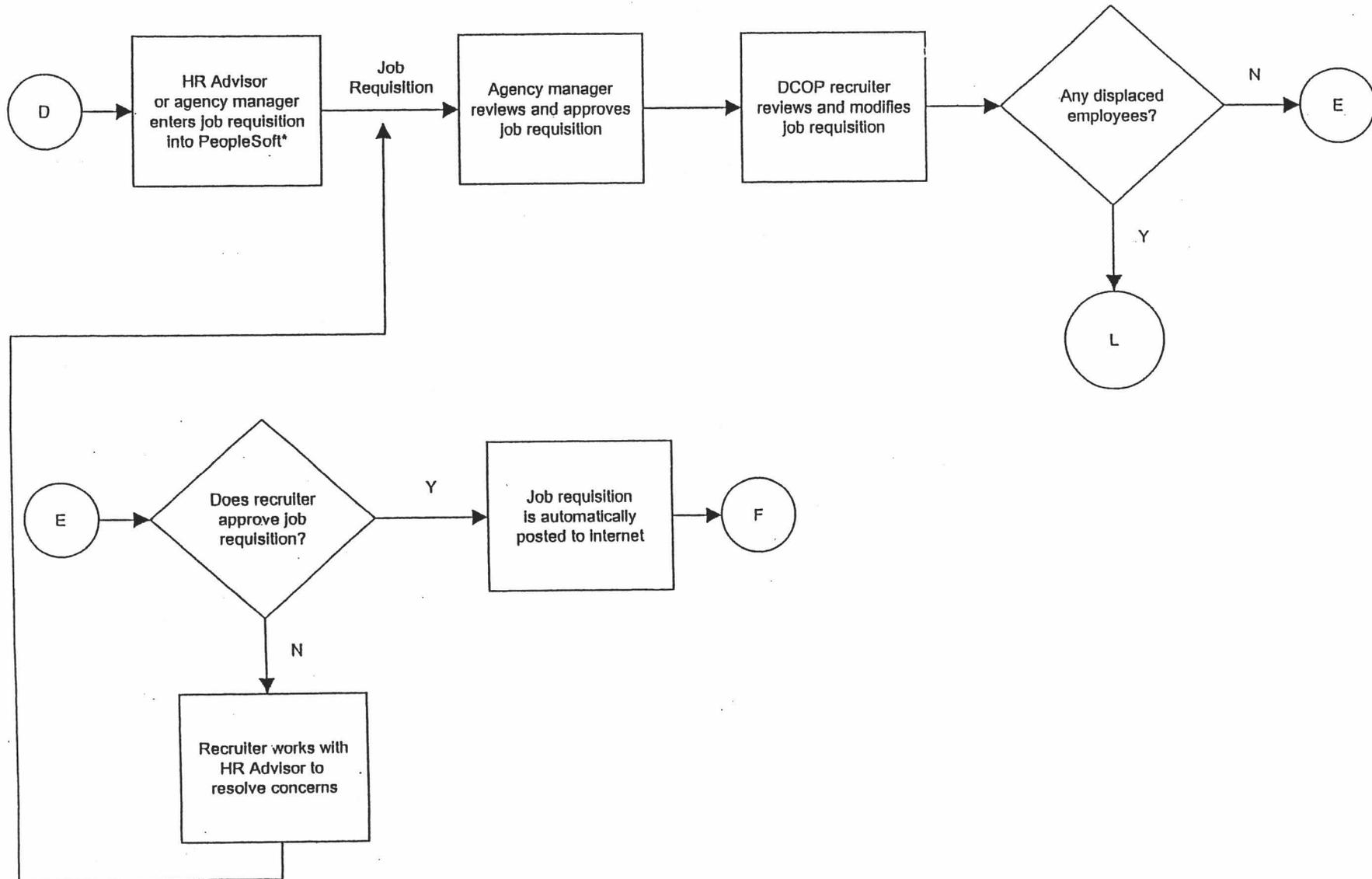


Note(s): \*OF-8 will be online with electronic signature

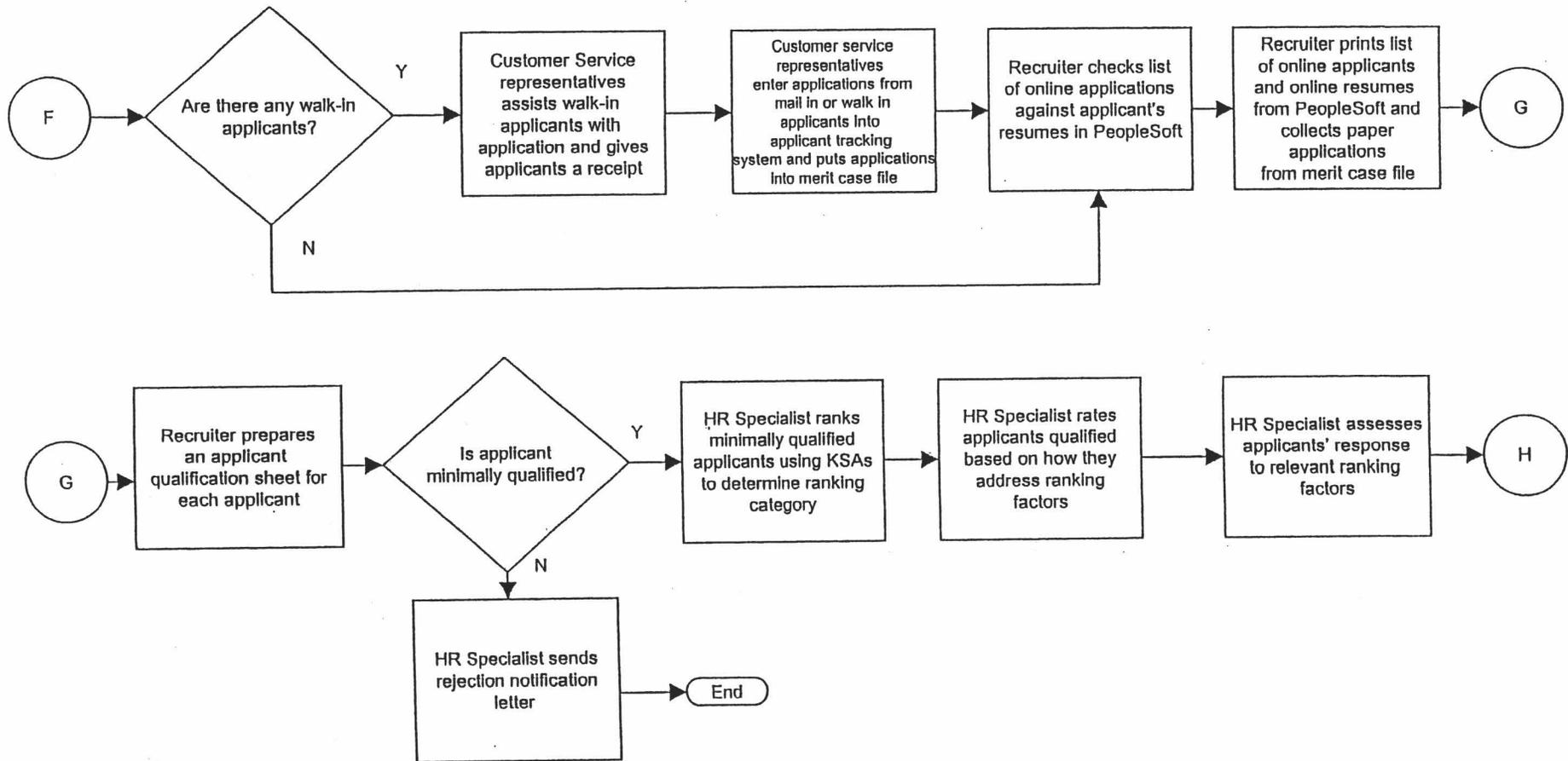
## 2.1 Career and Legal Service Positions



## 2.1 Career and Legal Service Positions



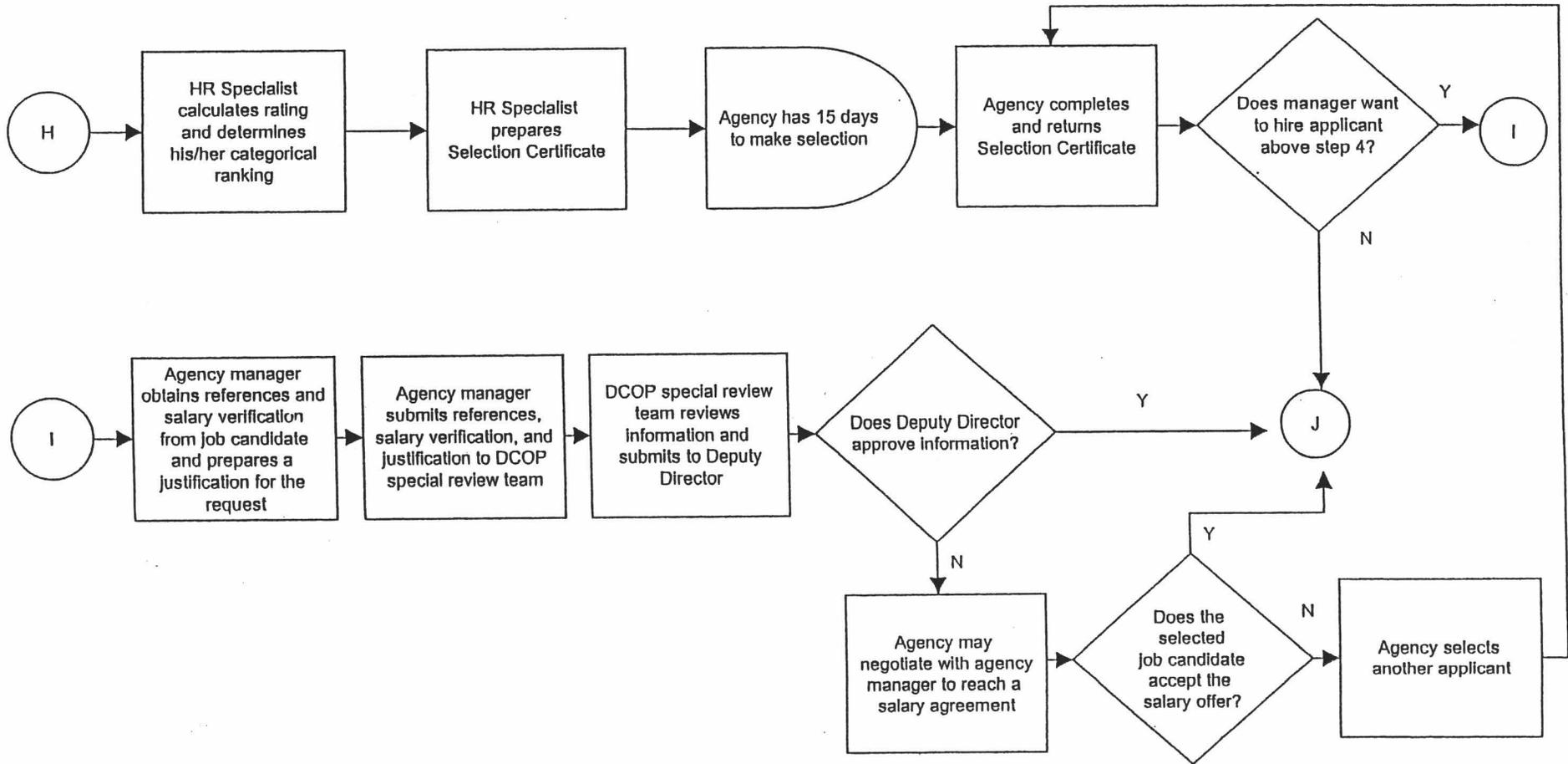
## 2.1 Career and Legal Service Positions



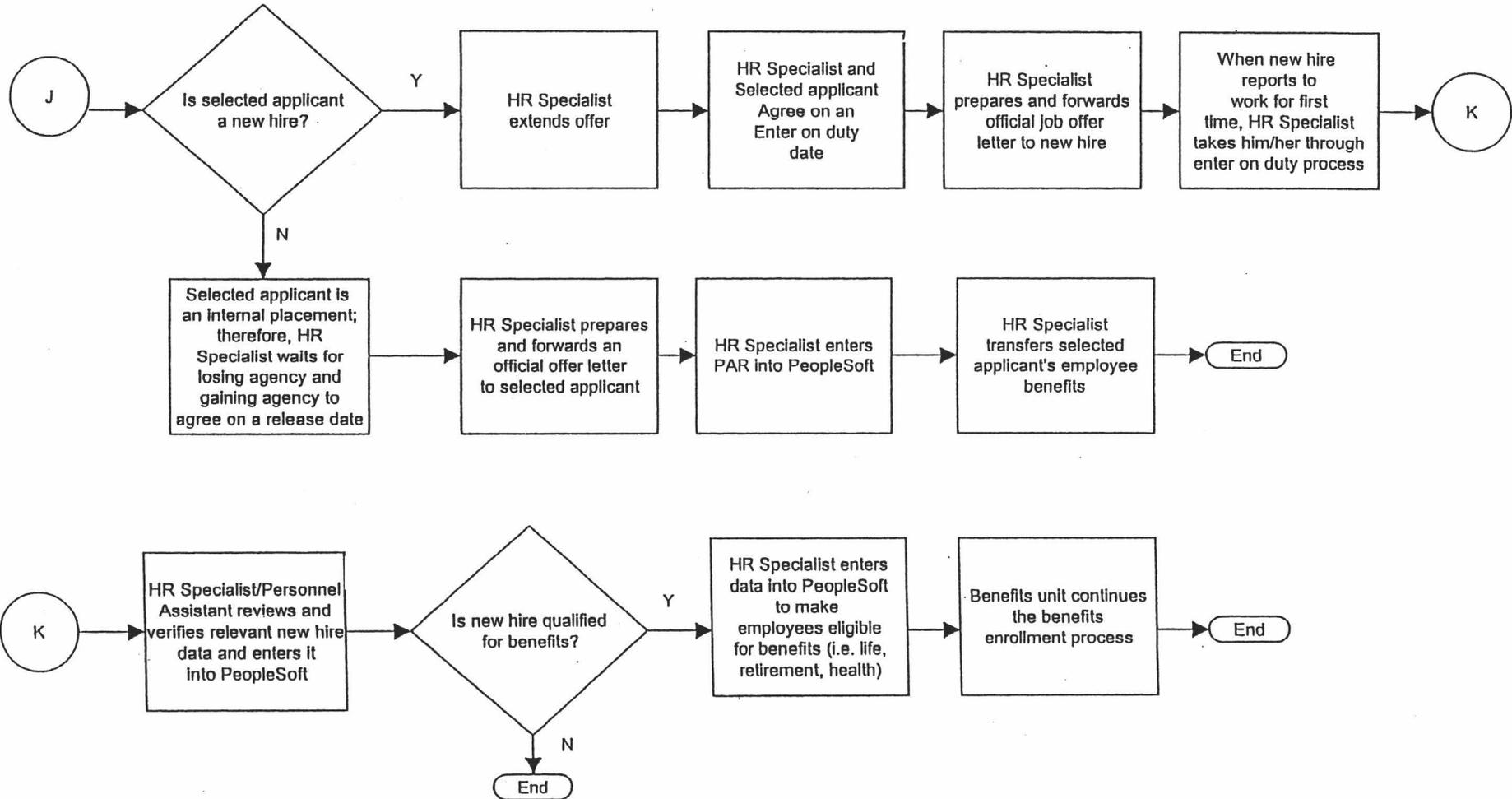
Note(s): \*These tasks are currently being done manually, but e-Recruit provides functionality for them, to be done automatically.

\*\*With front end scanning application, the data would not need to be entered into Applicant Tracking System.

## 2.1 Career and Legal Service Positions

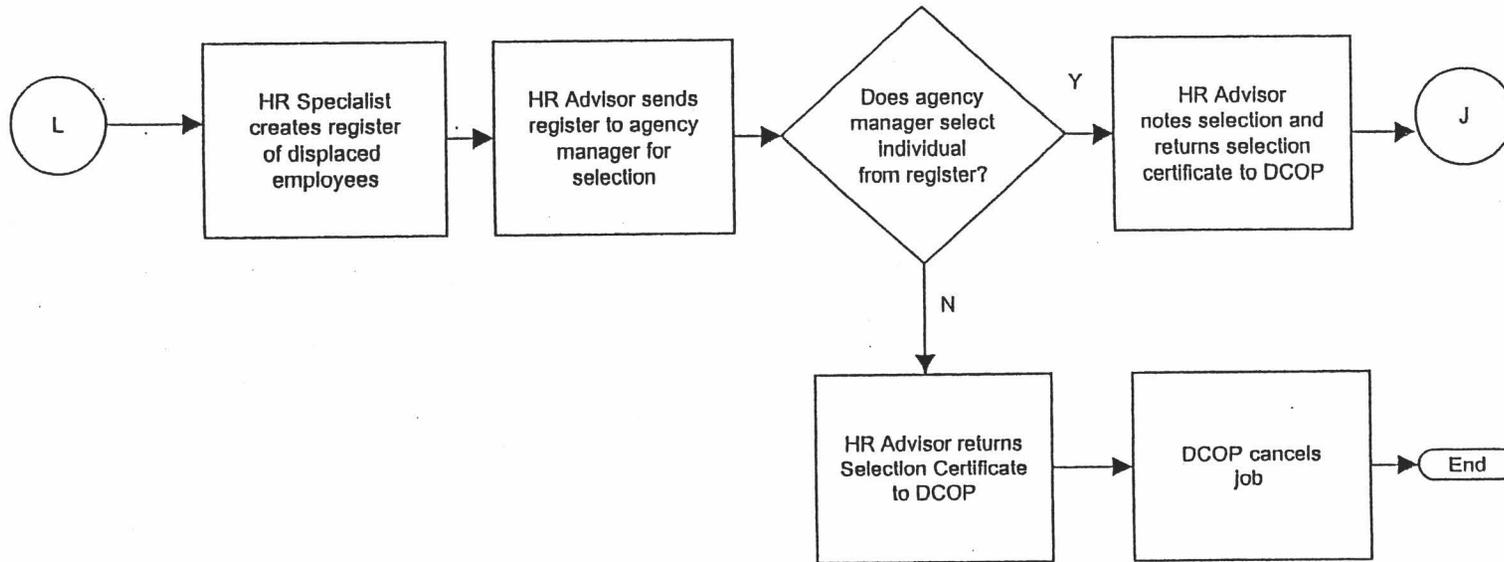


## 2.1 Career and Legal Service Positions

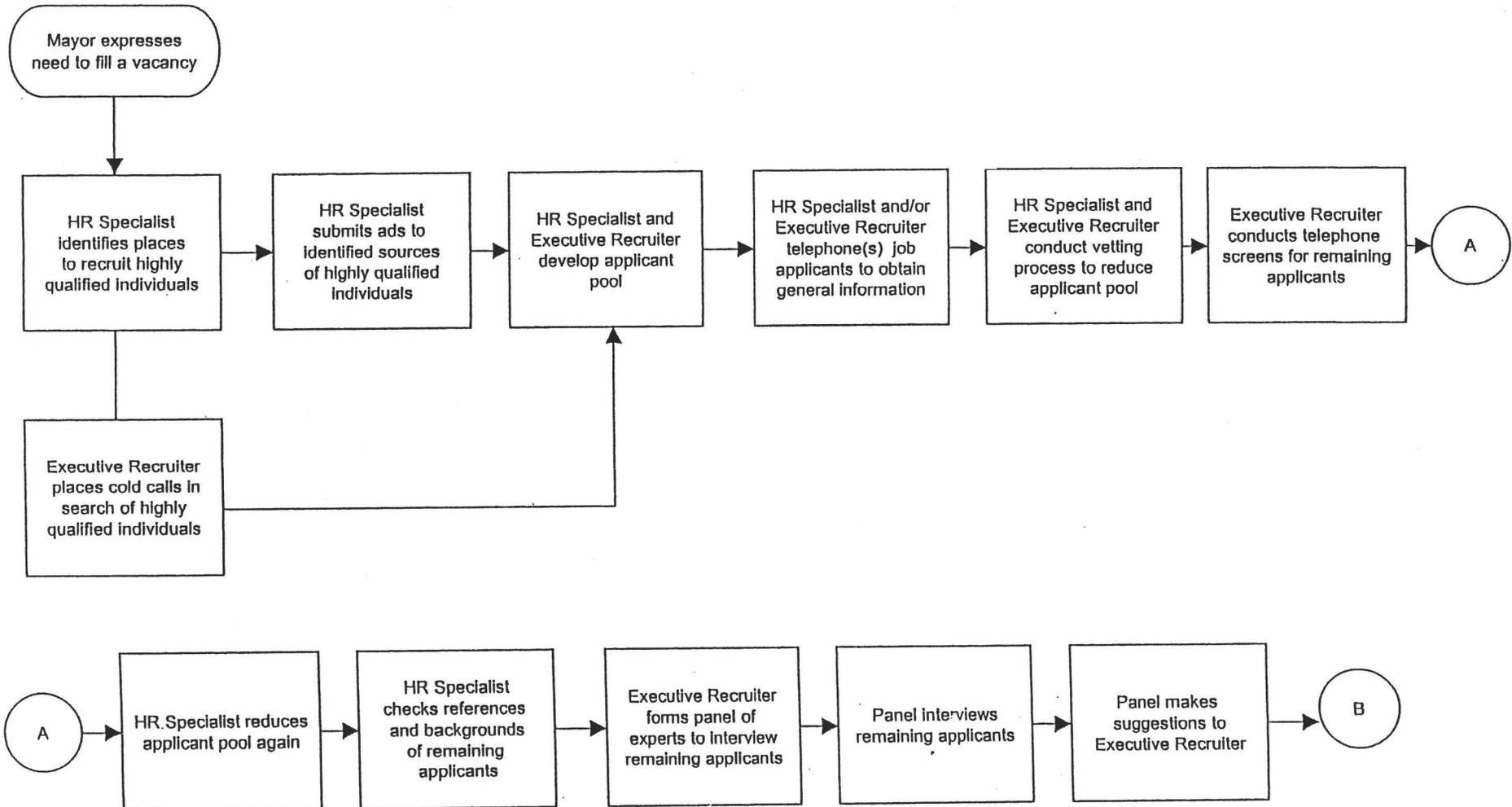


Note(s): \* Employee has 30 days to enroll in benefits.

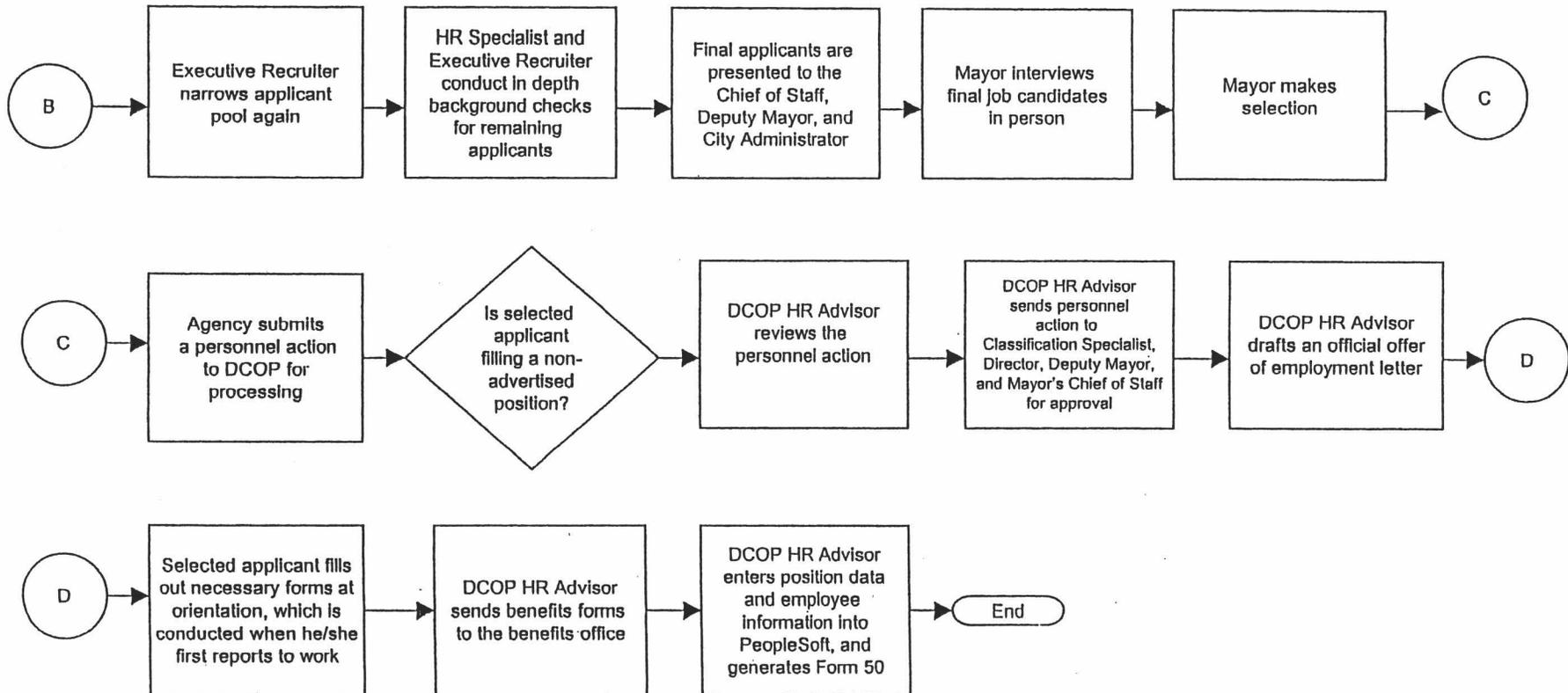
## 2.1 Career and Legal Service Positions



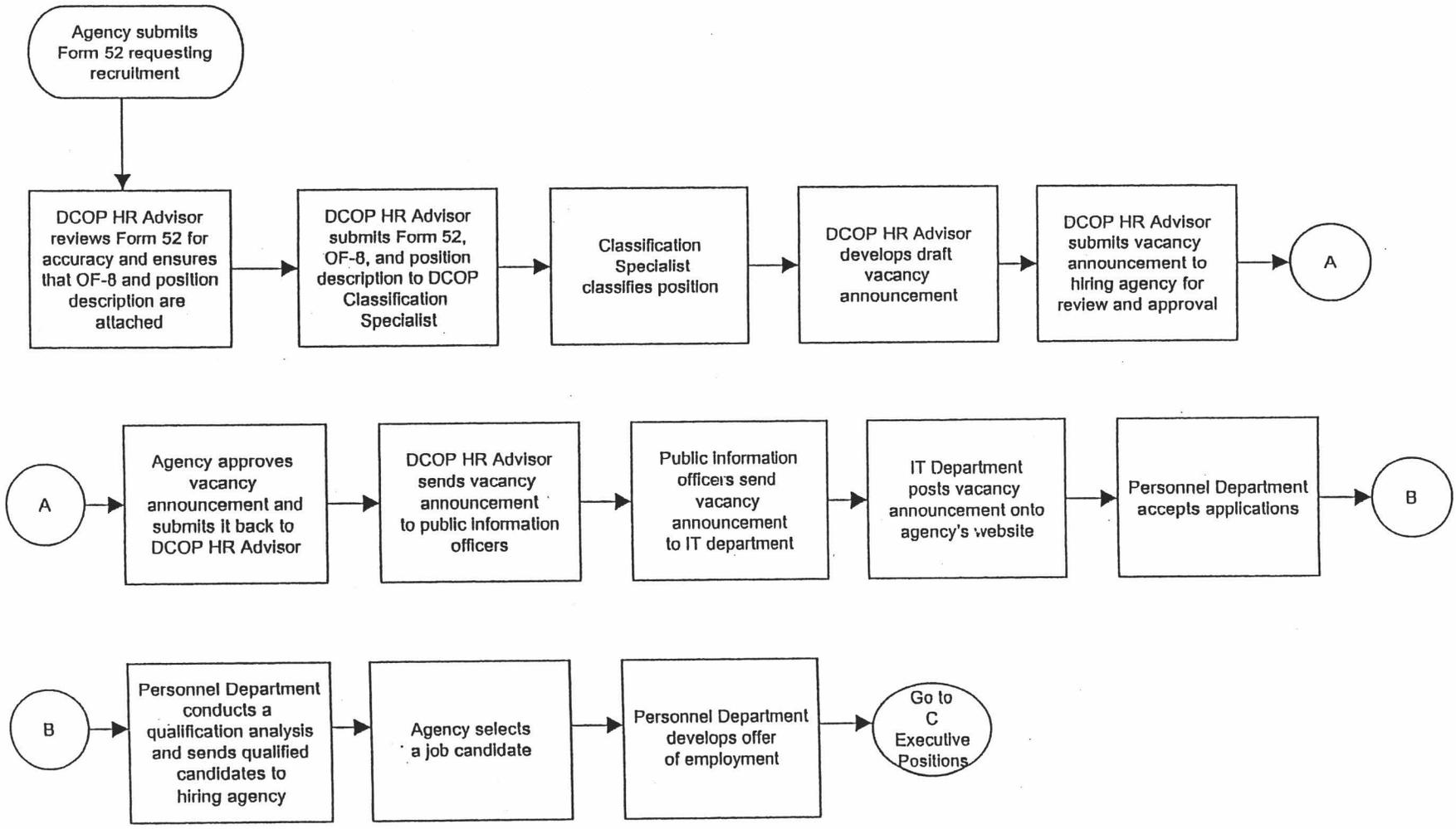
## 2.2 Executive Positions



## 2.2 Executive Positions



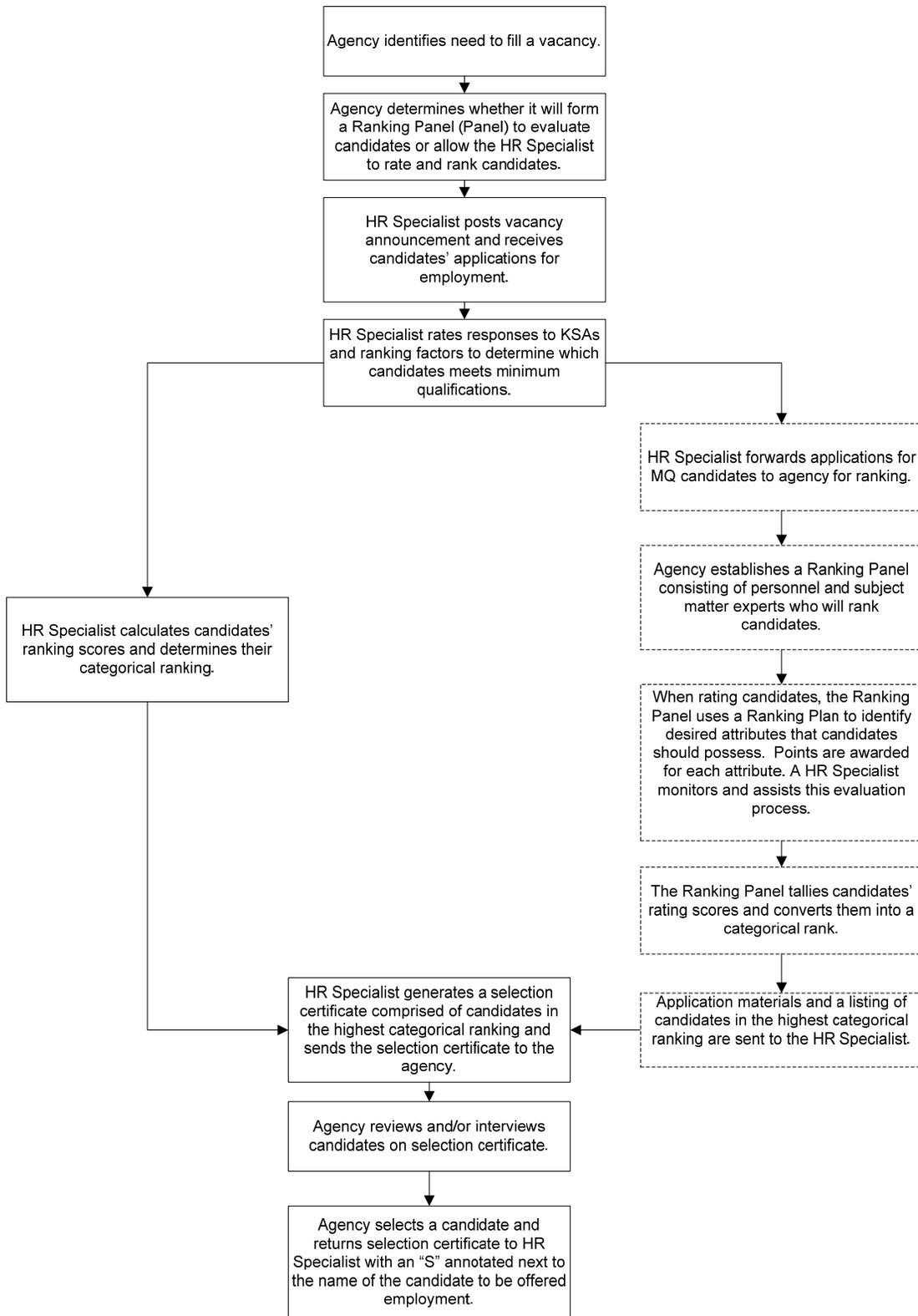
## 2.3 Excepted Service Positions



**APPENDIX 6**

# APPENDICES

## Ranking Panel Process Flow Chart



**APPENDIX 7**

# APPENDICES

## D.C. OFFICE OF PERSONNEL MERIT STAFFING CASE FILE CHECKLIST

Announcement No. \_\_\_\_\_

| ITEMS   | IS IN CASE FILE |     |     | IS NOT IN CASE FILE* |     |     |
|---|-----------------|-----|-----|----------------------|-----|-----|
| 1. COPY OF THE REQUEST FOR PERSONNEL ACTION (DCSF-52)   |                 |     |     |                      |     |     |
| 2. POSITION DESCRIPTION   |                 |     |     |                      |     |     |
| 3. JOB ANALYSIS DOCUMENTATION   |                 |     |     |                      |     |     |
| 4. INFORMATION USED TO DEVELOP THE RANKING FACTORS  |                 |     |     |                      |     |     |
| 5. RANKING PLAN OR CITATION, (E.G. X-118 STANDARDS)   |                 |     |     |                      |     |     |
| 6. RECORD OF ACTION TAKEN UNDER PRIORITY CONSIDERATION PROGRAMS   |                 |     |     |                      |     |     |
| 7. REASONS FOR USE OF A SPECIAL AREA OF CONSIDERATION   |                 |     |     |                      |     |     |
| 8. VACANCY ANNOUNCEMENT AND/OR CANCELLATION ANNOUNCEMENT, IF APPROPRIATE  |                 |     |     |                      |     |     |
| 9. INITIAL SCREENING WORKSHEET (DCSF-1210)  |                 |     |     |                      |     |     |
| 10. THE SF-171 (TO BE SUBSTITUTED BY THE DC-171 REAF's, AFTER ISSUANCE) AND ALL OTHER APPLICATION MATERIAL RECEIVED FROM EACH APPLICANT, AS APPROPRIATE (EVEN IF THE ANNOUNCEMENT IS CANCELLED) |                 |     |     |                      |     |     |
| 11. STATUS OF EMPLOYMENT APPLICATION POSTAL CARD (DCSF-1204)  | 1st             | 2nd | 3rd | 1st                  | 2nd | 3rd |
| 12. RATING MATERIAL ON EACH APPLICANT   |                 |     |     |                      |     |     |
| 13. COPY OF ALL DCSF-62's, RANKING PANEL MEMBER (RPM) PROFILE AND PLEDGE OF CONFIDENTIALITY   |                 |     |     |                      |     |     |
| 14. NOTES PRODUCED DURING RANKING PANEL CONSIDERATIONS  |                 |     |     |                      |     |     |
| 15. EVALUATION RECORDS OR NOTES MADE DURING OR AFTER THE INTERVIEW PROCESS, IF USED AS PART OF THE CREDITING PLAN PROCESS   |                 |     |     |                      |     |     |
| 16. ORIGINAL SELECTION CERTIFICATE (OP-325) WHICH INDICATES THE SELECTION OR OTHER FINAL ACTION ON THE CASE   |                 |     |     |                      |     |     |
| 17. COPY OF THE P.O. FORM-1 FOR THE SELECTEE(S)   |                 |     |     |                      |     |     |
| 18. ALL OTHER WRITTEN MATERIAL REQUIRED BY THE PROVISIONS OF THIS PLAN, SUCH AS REASON FOR REQUESTING ADDITIONAL CERTIFICATION  |                 |     |     |                      |     |     |

I certify by my signature that all the required documentation concerning this Merit Case File has been properly executed and filed.

\_\_\_\_\_  
Signature; Personnel Staffing Specialist

\_\_\_\_\_  
Signature; Reviewing Official

DATE: \_\_\_\_\_

DATE: \_\_\_\_\_

\* If this column is checked, use the reverse side to explain the reasons for the missing material.