


KING COUNTY AUDITOR'S OFFICE

January 2, 2018

TO:

Metropolitan King County Councilmembers

FROM:

Kymber Waltmunson, County Auditor

Follow Up on Opportunities to Improve Family and Medical Leave Administration

King County has made progress in advancing training and improving administration of Family and Medical Leave based on the recommendations of our 2015 audit. After the last audit follow up in 2016, there were six audit recommendations that had not been implemented. At that time, the Human Resources Division (HRD) was developing revisions to its Family Medical Leave Act (FMLA) and King County Family Medical Leave (KCFML) training. The training revisions addressed administrative changes resulting from changes to KCFML enacted in ordinance 18191.

Since that time, HRD's emphasis on training has continued, aiding implementation of the revised KCFML ordinance. The Benefits and Retirement Operations Section of the Finance and Business Operations Division took steps to simplify and align time reporting codes for FMLA and KCFML time entry, train administrators on the new codes, and performed outreach to employees affected by the KCFML change. Together, these actions helped simplify leave administration and aid consistency in time reporting. HRD's work completed three of our six audit recommendations.

The three remaining recommendations can be accomplished by formalizing responsibilities for leave administration across King County. In 2015, HRD performed a gap analysis of the county's leave administration responsibilities. Designating process owners for leave administration across county departments is both a key step to take following the gap analysis and an audit recommendation. Completing this work would help ensure consistency in leave policy and administrative practices. In addition, formalizing the draft policy regarding accurate time entry would help ensure the accuracy of leave time reporting.

Of the six remaining audit recommendations:

3 DONE	3 PROGRESS	0 OPEN
Fully implemented Auditor will no longer monitor.	**Partially implemented** Auditor will continue to monitor.	**Remain unresolved** Auditor will continue to monitor.

Please see below for details on the implementation status of these recommendations.

King County

Note: Recommendation 1 was previously completed in our 2016 follow-up report.

Recommendation 2 — DONE

The County Executive should conduct and document an assessment of impacts to employees that may result from the proposed policy change and determine whether action should be taken to address any identified impacts.

STATUS UPDATE: HRD conducted an assessment of the impact of the proposed change to King County Family Medical Leave (KCFML) policies in 2015. Based on the assessment, HRD staff prepared revised leave guidance for county employees in 2016, and also created a letter for those employees directly impacted by the KCFML policy change. The letter provided employees information regarding the change and further guidance on time reporting. These steps informed employees about their leave options, helping mitigate the potential negative impacts for those on KCFML.

Recommendation 3 — PROGRESS

The County Executive should conduct a thorough gap analysis to identify areas where additional oversight of leave administration across county departments and divisions would be beneficial and designate process owners to fill any identified gaps in oversight and accountability.

STATUS UPDATE: As mentioned in the last audit follow up, HRD conducted the gap analysis expected from this recommendation in 2015. However, the results of that analysis remain unimplemented. The gap analysis recognized that the decentralized structure of leave administration in the county results in "multiple inconsistences in the multiple areas of the leave administration process" relative to training, procedures, and information provided to employees. HRD's analysis made four recommendations, including recommendations to implement consistent leave processes across county departments and designate a department with formal oversight for leave processes and policies.

Implementation of these internal recommendations would clarify responsibility and accountability for leave policy throughout the county. To complete this recommendation, HRD and the Executive should fully implement the recommendations from their own gap analysis.

Recommendation 4 — DONE

The Human Resources Division and Benefits, Payroll, and Retirement Operations Section should develop comprehensive training and ensure that supervisors are trained at least annually on policies and procedures that relate to family and medical leave management and time approval.

STATUS UPDATE: HRD and the Benefits and Retirement Operations Section provided updated training to supervisors on FMLA/KCFML and time reporting in 2016 and early 2017; they plan to continue conducting these trainings at least annually, consistent with the recommendation terms. Providing comprehensive training on leave policies improves accuracy in managing employee leaves, in terms of timekeeping records and administrative processes, and greater consistency in

leave administration and communication. By implementing this recommendation, HRD helps ensure the benefits of this training continue to grow.

Recommendation 5 — PROGRESS

The Human Resources Division should formalize a clear mechanism and process owner(s) for the documentation, communication, and implementation of county policy and best practices in leave administration across county departments and divisions.

STATUS UPDATE: Similar to Recommendation 3, above, HRD and the Benefits and Retirement Operations Section updated leave administration references and materials as part of the changes to KCFML. However, HRD has not formally designated process owners for implementation of county leave policy within departments and divisions. To complete this recommendation, HRD should specifically identify the subject matter experts responsible for managing leave administration in each county department and division. Doing so would clarify responsibility and accountability for leave policy throughout the county, increasing consistency.

Recommendation 6 — DONE

The Department of Executive Services should develop a plan to facilitate accurate and complete entry of leave time, including mechanisms to:

a. **Reduce the complexity of time reporting codes on employee time logs.**
b. **Alert supervisors and/or timekeepers to check for family and medical leave status at specific intervals of reported family and medical leave use.**
c. **Train employees on proper time reporting.**

STATUS UPDATE: Staff from the Benefits and Retirement Operations Section engaged in a detailed, multi-department process to streamline and simplify time reporting. Although this effort did not greatly reduce the number of leave-specific time reporting codes, it did eliminate codes that were unique to particular departments. It also provided for specific training on the new timekeeping codes, as well as general information for both supervisors and employees. Implementing our recommended streamlined approach to time reporting, along with the additional training and reference materials, will help ensure that administrators have an accurate understanding of the employee's leave status and remaining leave.

Recommendation 7 — PROGRESS

The County Executive should develop policies clarifying that accurate time entry is a performance expectation for employees and supervisors.

STATUS UPDATE: HRD staff reported that a policy had been anticipated as part of the informational rollout supporting the changes to the KCFML ordinance in late 2015. However, the policy was never completed. Issuing a formal policy would help make certain that employees and supervisors are accountable for accurate entry of leave information and time reporting. To complete this recommendation, HRD staff should work with the Executive to complete and issue the policy.

Justin Anderson, Principal Management Auditor, conducted this review. Please contact Justin at 206-477-1046 if you have any questions about the issues discussed in this letter.

cc: Dow Constantine, King County Executive
Caroline Whalen, Interim Chief Operating Officer, Department of Executive Services (DES)
Rachel Smith, Chief of Staff, King County Executive's Office
Dwight Dively, Director, Office of Performance, Strategy & Budget
Ken Guy, Division Director, (DES), Finance & Business Operations Division
Jay Osborne, Interim Human Resources Director, Human Resources Division, DES
Julie Long, Executive Assistant, DES
Melani Pedroza, Clerk of the Council
Shelley Harrison, Administrative Staff Assistant, King County Executive Office