


KING COUNTY AUDITOR'S OFFICE

AUGUST 2, 2019

Follow-up on Opportunities to Improve Family and Medical Leave Administration

The creation of the Department of Human Resources led to greater consistency in leave administration across county functions. Ordinance 18763, enacted in early October 2018, created a new King County Department of Human Resources (DHR). The new department centralized human resources (HR) managers—previously positioned within individual departments—under DHR, while also incorporating the former Human Resources Division (HRD) of the Department of Executive Services (DES) and other HR-related functions. This effort had a corresponding effect on the consistency of direction regarding leave administration across King County.

Focused effort by the new Department of Human Resources has increased accountability and consistency in leave administration. As of our last audit follow-up (in January 2018), three of the audit's seven recommendations remained unfinished, but with substantial progress toward their completion by HRD before becoming a county department. Completing the remaining three recommendations required further work formalizing responsibility for leave administration across King County departments and ensuring clear direction regarding leave time reporting. During the departmental transition, HRD/DHR implemented a series of efforts addressing key elements of leave administration, providing additional training, templates, and process assistance to employees and supervisors responsible for management of Family and Medical Leave Administration (FMLA). Together, these steps resulted in clearer accountability for leave administration within and across county departments, and consistent practices through step-by-step guidance in FMLA management processes. These efforts completed two of the three remaining audit recommendations and should aid in finishing the third. The final audit recommendation, regarding accurate time entry, can be addressed by DHR policy currently under development.

Of the seven audit recommendations:

6 DONE	1 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

Recommendation 1

On February 10, 2016 DONE

Recommendation 2

On January 2, 2018 DONE

Recommendation 3

DONE

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: HRD conducted the initial gap analysis for this recommendation in 2015. The analysis recognized that the decentralized structure of leave administration led to inconsistencies in processes and leave management. HRD's analysis recommended implementation of consistent leave administration processes for all county departments and that the responsibility for leave processes and policy be formally designated in one department. These goals were finally reached as part of the creation of the Department of Human Resources. DHR now has direct responsibility for leave policy, and has developed consistent, standardized, process guidance for leave administrators since fall 2018.

IMPACT: By centralizing oversight for leave administration in DHR, the County addressed the recommendation's goal of clarifying responsibility and accountability for leave management throughout the County. Doing so helps ensure consistency and fairness in administering employee family and medical leave.

Recommendation 4

On January 2, 2018 DONE

Recommendation 5

DONE

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: As in Recommendation 3, above, DHR developed step-by-step process guidance for leave administration for department HR administrators. It also developed templates for specific elements and milestones in FMLA management: standardized forms and emails providing employees and supervisors information and direction on time reporting, terms of approved leave, and calculation of leave accruals. The step-by-step training also includes standardized instructions for querying time and labor data from the PeopleSoft system. In addition, DHR has developed additional resources for dissemination of FMLA policy guidance, re-forming the Leaves Working Group into the Leaves Administration Team, and creating the leave

administration blog.[1] These training and communication tools directly address particular questions in leave administration and help disseminate best practices throughout the County.

IMPACT: As with Recommendation 3, implementation of this recommendation by providing comprehensive and consistent leave administration direction across county functions helps ensure consistency and fairness in administering FMLA. It also enables greater efficiency in managing complex issues in leave coordination: rules, regulations, and documentation requirements.

Recommendation 6

On January 2, 2018 DONE

Recommendation 7

PROGRESS

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

STATUS UPDATE: At the time of the audit (February 2015), the intent of the recommendation was straightforward, in that employees and supervisors had no formal requirement to accurately track family medical leave. Consequently, different departments had different levels of accuracy regarding FMLA timekeeping. HRD staff anticipated a policy as part of changes to the family medical leave ordinance in late 2015, but it was not formalized. Because DHR's formation centralized leave administration in one department, DHR is better positioned than HRD to ensure the accuracy of leave time entry across the County. However, DHR staff noted concerns that responsibilities for approving employee time can vary between direct supervisors and timekeepers. Regardless, a formal policy would help ensure that employees and supervisors—or timekeepers—are accountable for accurate entry of leave information and time reporting.

WHAT REMAINS: DHR is currently developing a comprehensive countywide FMLA and Fair Labor Standards Act (FLSA) policy; this effort, as well as future guidance on FMLA time entry, could address the recommendation. To complete this recommendation, DHR should ensure that the pending policy guidance clarifies that accurate time entry is a fundamental expectation.

Justin Anderson, Principal Management Auditor, conducted this review. If you have any questions or would like more information, please contact the King County Auditor's Office at 206-477-1033 or KCAO@KingCounty.gov.

[1] King County Leave Administration Blog: https://kingcountyleaveadministration.wordpress.com/