

# **Department of Education**

## **Internal Audit**

### **Hiring Practices Review – Amended**

**Issue Date: September 2016**

**Report Number: FY2016-03**

Department of Education  
Hiring Practices Review - Amended

*Executive Summary*

<b>AUDIT OF:</b> Hiring Practices Review	<b>DATE:</b> Fieldwork performed March 2016 – June 2016	<b>AUDIT RATING:</b> Acceptable <input checked="" type="checkbox"/> Marginal <input type="checkbox"/> Unacceptable <input type="checkbox"/>
---	---	--

**INTRODUCTION:**

In connection with the Department of Education’s (DOE) Updated Risk Assessment and Internal Audit Plan approved on August 4, 2015, Internal Audit (IA) performed a “*Hiring Practices Review*.” The purpose of this project was to review the DOE’s hiring practices to ensure that adequate controls are in place to maintain compliance with policies and procedures to hire qualified candidates; examine the structured hiring process for reviewing applications, conducting interviews, and recommending a candidate for hire; and to review the procedures for appointments that bypass the structured hiring process, as well as the controls designed to ensure that a candidate meets the minimum job qualifications for the position.

**BACKGROUND:**

The Office of Human Resources (OHR) administers a comprehensive personnel program for certificated, classified, and casual employees of the public school system within the framework of established laws, policies, and accepted principles of personnel management. OHR develops and administers administrative rules and regulations; publishes operational guidelines; and provides centralized employment and personnel administration services to schools, district and state administrative offices to ensure that the support is being provided efficiently and effectively.

The Recruitment & Employment Section (RES) is one of the sections in the Personnel Management Branch (PMB) under OHR. The RES administers the following programs and functions for the DOE: vacancy announcements, job opportunities, and interview and selection guidelines. Units under RES include Teacher Recruitment, Classified/Support Services Personnel (CSSP) Recruitment, Educational Officer (EO) Recruitment, Employee Background Check (EBC) Unit, and Reclassification Unit.

The DOE uses eHR as its human resources information system. One of the components in eHR is the recruitment process, which tracks the need to fill specific positions, allows applicants (both external and internal to the DOE) to apply online and for users to review and select applicants. This includes requests to fill positions, online applications, and referral lists.

The DOE’s salaried workforce is separated into three (3) general groups of employees: civil service and exempt employees, support services personnel, and teachers and educational officers. The workforce profile for the DOE at June 30, 2015 was comprised of the following:

Civil Service & Exempt	5,183	24%
Support Services Personnel	2,936	13%
Teachers & Educational Officers	13,588	63%
<b>Total Workforce</b>	<b>21,707</b>	<b>100%</b>

CSSP Recruitment plans and administers internal and external recruitments for all civil service and support services personnel positions including (but not limited to) SASAs, secretaries, office assistants, account clerks, aides, educational assistants, attendants, custodians, cafeteria workers, psychologists, therapists, and other positions. Teacher Recruitment does the recruitment for all teachers in addition to

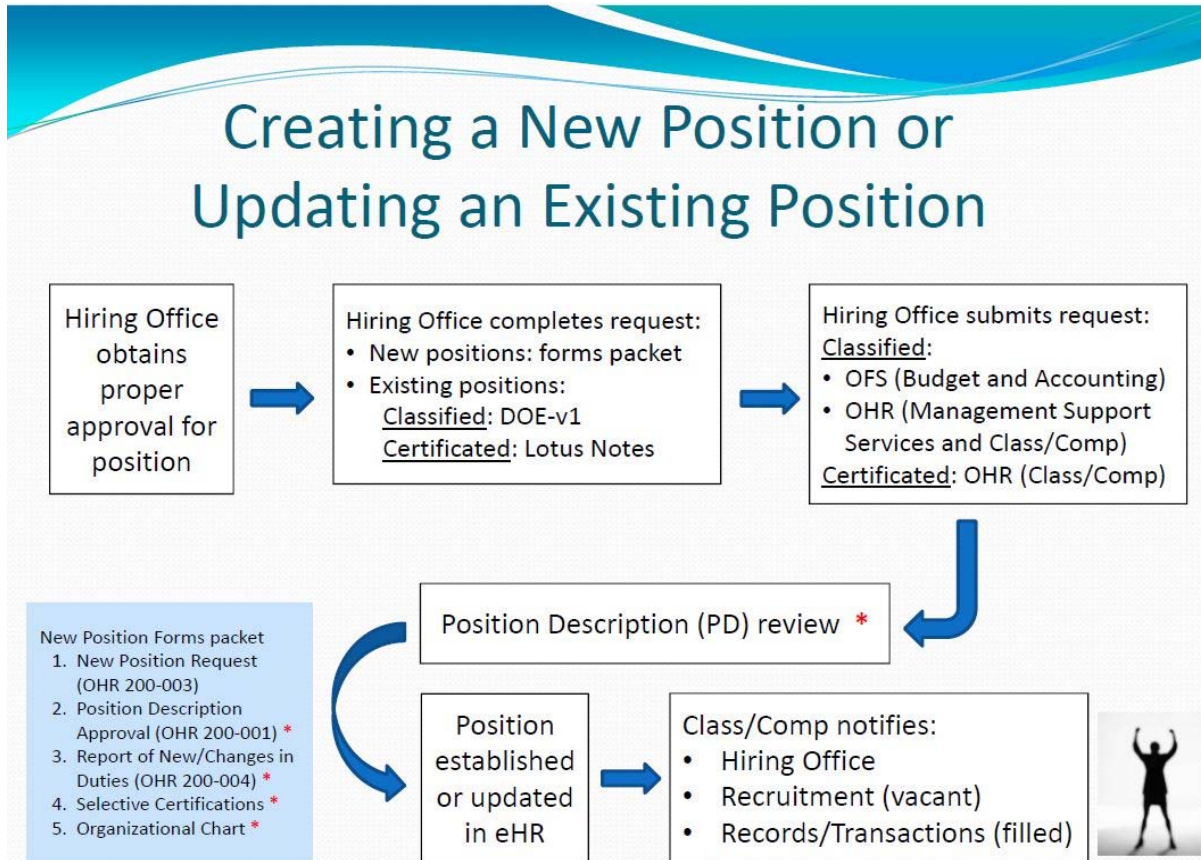
Department of Education  
Hiring Practices Review - Amended

Executive Summary

counselors, student services coordinators, registrars, librarians, and student activity coordinators. EO Recruitment does the recruitment for educational officers including (but not limited to) principals, vice principals, state office and athletic directors, specialists, analysts, academic officers, personnel regional officers, and other positions.

The recruitment process can only start after the approval is obtained by the hiring office for either a newly created position or an existing position that has been updated. The hiring office is required to complete the position description for a new position. Position descriptions document major duties and responsibilities; purpose of the position; minimum qualifications (MQ); and competencies. The position is then established or updated in eHR (if previously established) and the recruitment process can begin.

Below is a detailed depiction of the process to create a new position or update an existing position.

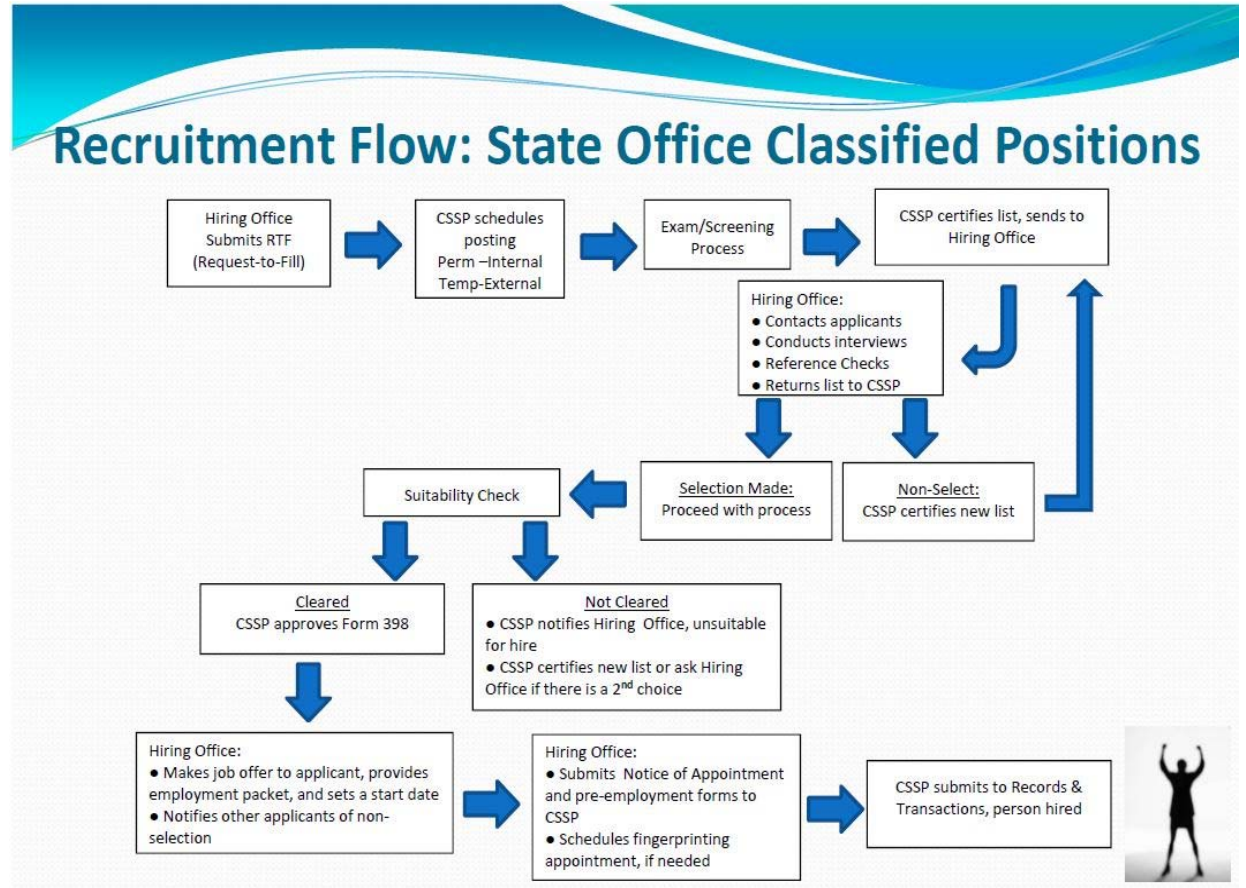


After the position is established or updated, the recruitment process continues. The recruitment process varies between the three (3) different recruitment units (CSSP, EO, and Teacher) but in general, the hiring office first informs the recruitment office of a vacancy. The recruitment office can then advertise the position. Once applications come in, the recruitment office will do a screening of the applicants to ensure that MQs are met. The recruitment office will then provide the hiring office with a list of qualified applicants from which the hiring office may contact to conduct interviews, perform reference checks, and make a selection. A suitability check is performed before the hiring office can make a job offer to the applicant.

Department of Education  
Hiring Practices Review - Amended

Executive Summary

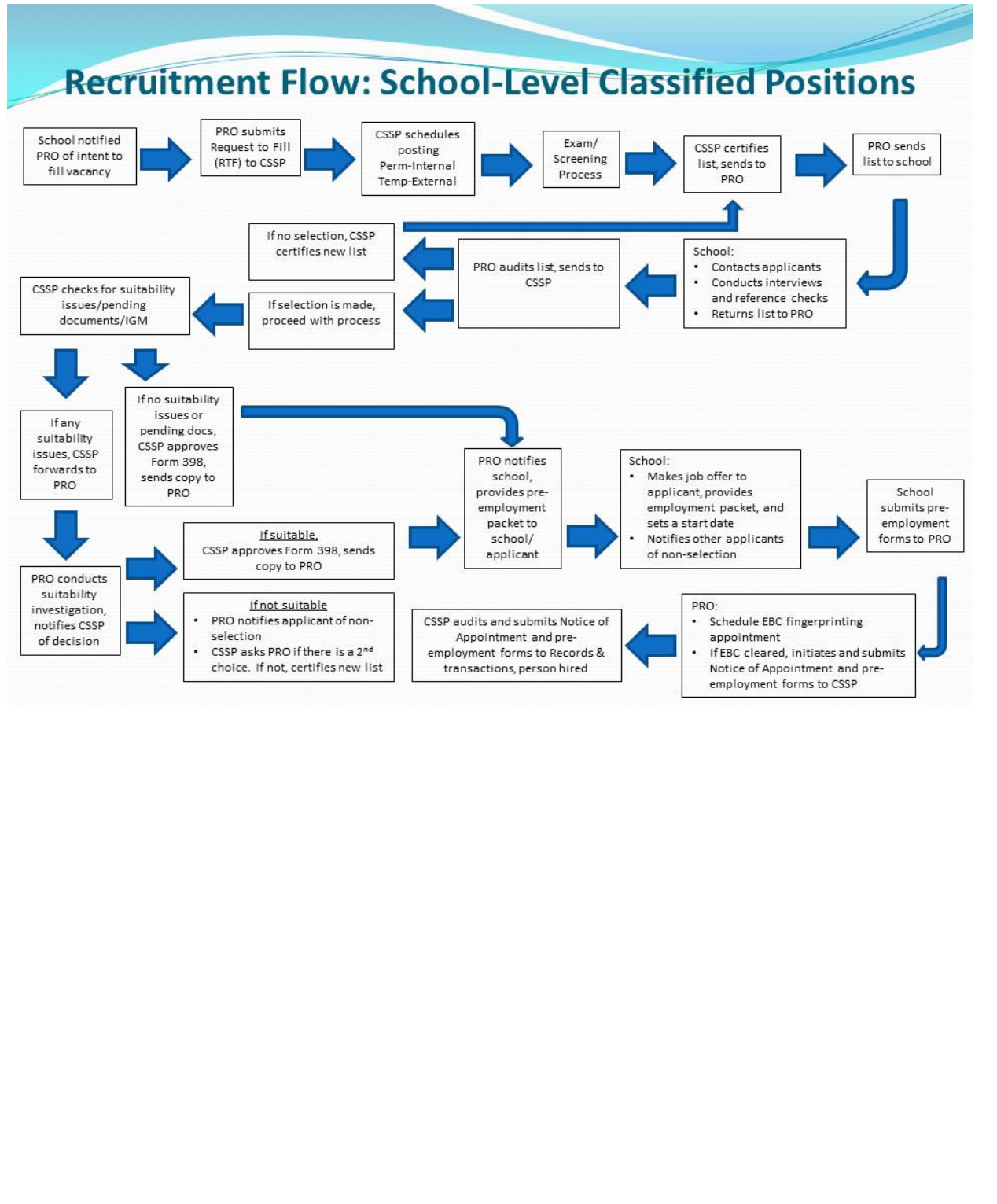
Below is a detailed depiction of the recruitment flow for state office classified positions.



Department of Education  
Hiring Practices Review - Amended

Executive Summary

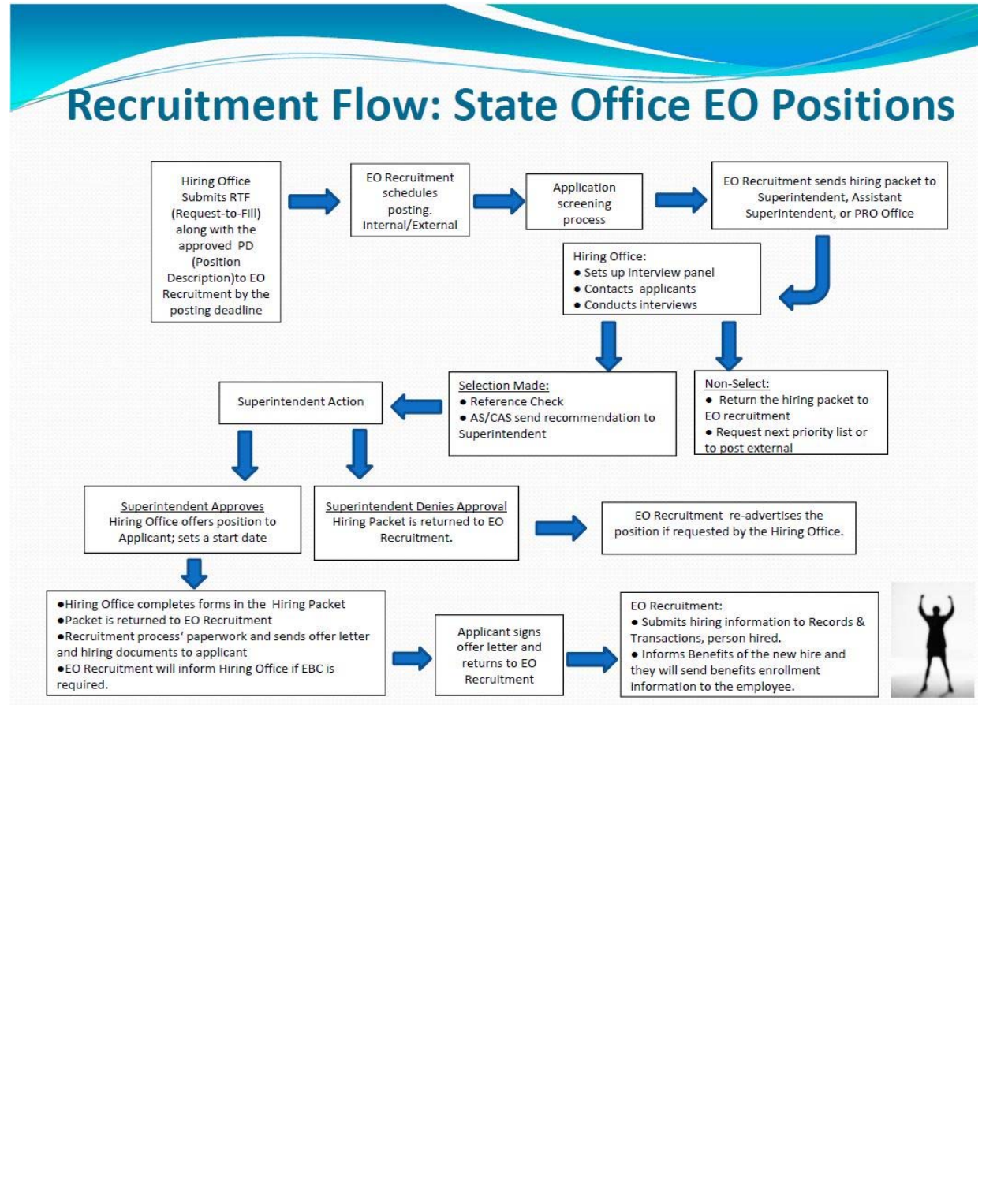
Below is a detailed depiction of the recruitment flow for school-level classified positions.



Department of Education  
Hiring Practices Review - Amended

Executive Summary

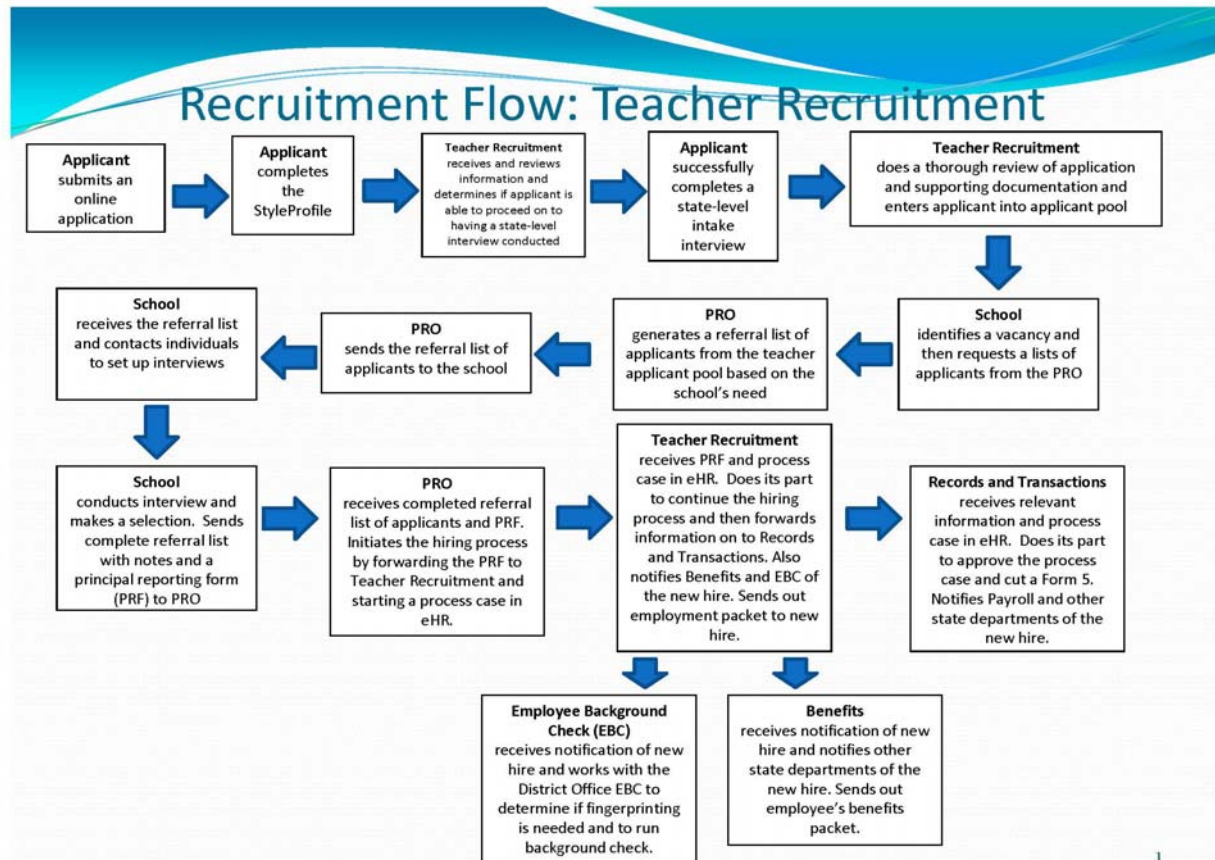
Below is a detailed depiction of the recruitment flow for state office EO positions.



Department of Education  
Hiring Practices Review - Amended

*Executive Summary*

Below is a detailed depiction of the recruitment flow for teacher positions.



Appointed Positions

Appointed positions are filled by employees selected by the Superintendent and these employees are considered “at-will employees.” According to OHR Management, the Superintendent has sole discretion as to who to hire to fill appointed positions. Since these employees are “at-will employees”, the Superintendent may terminate the employee for any reason. Hiring of employees into appointed positions require the Board of Education’s (BOE) approval. According to School Code, appointed positions/excluded personnel are those employees who are appointed by the BOE/Superintendent and other certificated employees who serve in confidential/managerial positions as defined in HRS 89-6 (c).

HRS 89-6 (c) states that “*the classification systems of each jurisdiction shall be the basis for differentiating blue collar from white collar employees, professional from institutional, health and correctional workers, supervisory from nonsupervisory employees, teachers from educational officers, and faculty from nonfaculty. In differentiating supervisory from nonsupervisory employees, class titles alone shall not be the basis for determination. The nature of the work, including whether a major portion of the working time of a supervisory employee is spent as part of a crew or team with nonsupervisory employees, shall be considered also.*”

Department of Education  
Hiring Practices Review - Amended

*Executive Summary*

---

Appointed positions include (but not limited to): Superintendent, Deputy Superintendent, Senior Assistant Superintendent, Assistant Superintendents, Complex Area Superintendents, Senior Assistant to the Superintendent, Executive Director for the Hawaii Teacher Standards Board, and BOE Director.

Barbara Krieg is the Assistant Superintendent of OHR. Kerry Tom is the Director in the Personnel Management Branch (PMB). The Recruitment Section is a unit within the PMB of OHR and is led by Sean Bacon, Personnel Specialist. Other recruiting sections in OHR are as follows.

- Teacher Recruitment Unit – Kimberly Miyamoto, Personnel Specialist
- Classified/Support Services Personnel (CSSP) Recruitment Unit – April Haili, Personnel Specialist
- Educational Officer (EO) Recruitment – Aloha Dayton, Personnel Specialist

Policies and procedures for hiring practices are kept on the DOE intranet in the Office of Human Resources site. Recruitment & Employment Section (RES) forms are also kept on the same site. Through research and discussion with Management, IA identified Chapter 7 of Title 8, Hawaii Administrative Rules (HAR), entitled “Public School Personnel: Criminal History Record, Employment History, and Background Checks” and Chapter 63 of Title 8, HAR, entitled “Civil Service Rules” as regulatory requirements.

In addition, DOE is responsible for following federal and state laws governing hiring practices (such as federal laws prohibiting discriminatory employment practices with respect to race, color, religion, sex, or national origin), and employment requirements (such as the Hawaii Revised Statutes (HRS) Title 7 entitled “Public Officers and Employees”) as regulatory requirements. School Code and bargaining unit contracts are also required to be followed.

**SCOPE and OBJECTIVES:**

The scope of our review included an examination of the hiring practices controls processes in the DOE for salaried employees. Salaried employees include employees classified within Teacher Recruitment, CSSP Recruitment, and EO Recruitment. We reviewed the design and operating effectiveness of the existing control process in place. Through our risk assessment in the hiring practices controls processes, the scope of our review specifically focused on the processes related to the following subcategories that IA deemed as high risk:

- Recruitment
- Selection/Recommendation
- Background Check/Fingerprinting

The scope of any detailed testing will cover the fiscal year 2016 up to fieldwork date.

We excluded detailed testing on casual hires as this area was already reviewed in the Casual Hire Personnel Recruitment, Hiring & Payroll Processes Review performed by IA during fiscal year 2013.

The objectives of our review included the following:

1. To obtain a general understanding of the design and operating effectiveness of the hiring processes.
2. To review, evaluate, and test the operating effectiveness of the hiring process to ensure that the DOE has adequate internal controls in place to maintain compliance with policies and procedures and Federal and State laws and regulations to hire qualified candidates.



Department of Education  
Hiring Practices Review - Amended

*Executive Summary*

---

3. To review, evaluate, and test the operating effectiveness of the structured hiring process for reviewing applications, conducting interviews, and recommending a candidate for hire.
4. To review, evaluate, and test the operating effectiveness of procedures for appointments that bypass the structured hiring process, as well as the controls designed to ensure that a candidate meets the minimum job qualifications for the position.
5. To provide recommendations based on leading practices for improvement to enhance the effectiveness and efficiency of the hiring processes.

**OBSERVATIONS:**

Based upon our review, we found the DOE's controls related to hiring practices are functioning at an "acceptable" level. An acceptable rating indicates that no significant deficiencies exist, while improvement continues to be appropriate; controls are considered adequate and findings are not significant to the overall unit/department.

Please refer to the Risk Ratings section of this report (page 9) for a complete definition of the ratings used by IA and the Observations and Recommendations section for a detailed description of our findings.

We discussed our preliminary findings and recommendations with Management and they were receptive to our findings and agreed to consider our recommendations for implementation.

Each observation presented in this report is followed by specific recommendations that will help to ensure that control gaps are addressed and, if enforced and monitored, will mitigate the control weaknesses. In summary, our observations are as follows:

1. Lack of oversight and monitoring over the verification process
2. Improvements needed for vacancy recruitment for EO subs and 89-day hires
3. Proper forms and supporting documents are not always kept on file

**PLANNED FOLLOW UP BY MANAGEMENT AND INTERNAL AUDIT:**

IA will follow up with Management on their progress of completion for their action plans and report accordingly through the audit committee quarterly updates.

Department of Education  
Hiring Practices Review - Amended

*Rating Scale Definitions*

<b>OVERALL RATING SCALE</b>	
<b><i>Acceptable</i></b>	No significant deficiencies exist, while improvement continues to be appropriate; controls are considered adequate and findings are not significant to the overall unit/department.
<b><i>Marginal</i></b>	Potential for loss to the auditable unit/department and ultimately to the DOE. Indicates a number of observations, more serious in nature related to the control environment. Some improvement is needed to bring the unit to an acceptable status, but if weaknesses continue without attention, it could lead to further deterioration of the rating to an unacceptable status.
<b><i>Unacceptable</i></b>	Significant deficiencies exist which could lead to material financial loss to the auditable unit/department and potentially to the DOE. Corrective action should be a high priority of Management and may require significant amounts of time and resources to implement.

<b>OBSERVATION RATING SCALE</b>	
<b><i>High (1)</i></b>	<p>1 - The impact of the finding is <i>material</i><sup>1</sup> and the likelihood of loss is probable in one of the following ways:</p> <ul style="list-style-type: none"> <li>• A material misstatement of the DOE’s financial statements could occur;</li> <li>• The DOE’s business objectives, processes, financial results or image could be materially impaired;</li> <li>• The DOE may fail to comply with applicable laws, regulations or contractual agreements, which could result in fines, sanctions and/or liabilities that are material to the DOE’s financial performance, operations or image.</li> </ul> <p><i>Immediate action is recommended to mitigate the DOE’s exposure</i></p>
<b><i>Moderate (2)</i></b>	<p>2 - The impact of the finding is <i>significant</i><sup>1</sup> and the likelihood of loss is possible in one of the following ways:</p> <ul style="list-style-type: none"> <li>➤ A significant misstatement of the DOE’s financial statements could occur;</li> <li>➤ The DOE’s business objectives, processes, financial performance or image could be notably impaired;</li> <li>➤ The DOE may fail to comply with applicable laws, regulations or contractual agreements, which could result in fines, sanctions and/or liabilities that are significant to the DOE’s financial performance, operations or image.</li> </ul> <p><i>Corrective action by Management should be prioritized and completed in a timely manner to mitigate any risk exposure.</i></p>
<b><i>Low (3)</i></b>	<p>3 – The impact of the finding is moderate and the probability of an event resulting in loss is possible.</p> <p><i>Action is recommended to limit further deterioration of controls.</i></p>

<sup>1</sup> The application of these terms are consistent with the guidelines provided by the Institute of Internal Auditors

Department of Education  
Hiring Practices Review - Amended

*Observations*

---

The detailed observations noted herein were based on work performed by IA through the last date of fieldwork and are generally focused on internal controls and enhancing the effectiveness of processes for future organizational benefit.

<b>Obs. No.</b>	<b>Description</b>	<b>Page #</b>
1	Lack of oversight and monitoring over the verification process	11
2	Improvements needed for vacancy recruitment for EO subs and 89-day hires	15
3	Proper forms and supporting documents are not always kept on file	18

Department of Education  
Hiring Practices Review - Amended

*Observations*

**Observation Number: 1**

**Observation: Lack of oversight and monitoring over the verification process** **Rating: High**

Employee background checks are conducted to maintain a high-quality workforce and, most importantly, to ensure the safety and well-being of students and staff. In addition to local criminal history checks, the DOE mandates fingerprint-based criminal background checks of employees who work in close proximity to children. All DOE employees who work in close proximity to children are required to complete an EBC and be cleared suitable to work. Applicants are required to complete another EBC if there is a break in service of six (6) months or greater for individuals who were previously employed. As an additional safeguard when a current DOE employee transfers to a new position the employee is customarily subject to the EBC requirements even if the employee was previously checked and cleared. Classified employees are not allowed to start work before the EBC, including fingerprinting check, is completed. However, certificated employees have 30 days after the start of employment to complete the fingerprint part of the EBC process. The offer of employment remains “conditional” until such time the individual has completed the entire EBC process and is determined to be suitable to work.

Once an applicant is selected, the hiring office will make a clearance request in eHR. eHR will then send an email to EBC that states a request has been submitted. Upon receiving the request, the EBC Unit will perform the necessary checks.

The EBC process takes a minimum of two (2) days to two (2) months. This timeframe is dependent on external criminal justice agencies that are used to perform the criminal history checks. The requirements for background checks and fingerprinting vary based on proximity to children. Background checks are conducted based on the following criminal history searches: name checks through the Hawaii State database and fingerprinting and name checks through the FBI Federal database. There are also controls in place where a self-declaration of suitability is required in the initial stages of recruitment in attempts to catch issues upfront.

If an applicant is found suitable, he/she will be allowed to start employment. If an applicant is found not suitable, it is documented in eHR and the conditional offer is withdrawn. If an employee starts working prior to EBC and he/she is found not suitable, then the employee is terminated and the service ends in eHR. There is an appeal process provided for applicants that do not pass EBC.

The following table summarizes the exceptions noted during our review indicating a lack of oversight and monitoring over the verification process.

Recruitment Section	Summary of Observations Noted	# of Occurrences	% of Occurrences
EO Recruitment	EBC was completed after the employee’s start date for 14 of the 25 new EO hires selected for testing. Of the 14 new EO hires that started prior to completing the EBC, 11 of the EO hires were already current employees of the DOE. In addition, for 12 of the 14 new EO hires that started prior to	14/25	56%

Department of Education  
Hiring Practices Review - Amended

*Observations*

Recruitment Section	Summary of Observations Noted	# of Occurrences	% of Occurrences
EO Recruitment (Continued)	<p>completing the EBC, the request date to initiate the EBC was after the employee's start date.</p> <p><u>Number of Days Between EBC Cleared Date and Employee Start Date</u></p> <ul style="list-style-type: none"> <li>• 1 – 30 days: 11 new EO hires (nine (9) of the EO hires were already current employees of the DOE)</li> <li>• 31 – 60 days: one (1) new EO hire (the EO hire was already a current employee of the DOE)</li> <li>• 61 – 90 days: two (2) new EO hires (one (1) of the EO hires was already a current employee of the DOE)</li> </ul>		
Teacher Recruitment	<p>EBC was completed after the employee's start date for nine (9) of the 22 new teacher hires selected for testing. Of the nine (9) new teacher hires that started prior to completing the EBC, two (2) new teacher hires were already current employees of the DOE. In addition, for eight (8) of the nine (9) new teacher hires that started prior to completing the EBC, the request date to initiate the EBC was on or after the employee's start date.</p> <p><u>Number of Days Between EBC Cleared Date and Employee Start Date</u></p> <ul style="list-style-type: none"> <li>• 1 – 30 days: six (6) new teacher hires (two (2) new teacher hires were already current employees of the DOE)</li> <li>• 31 – 60 days: one (1) new teacher hire</li> <li>• 61 – 90 days: one (1) new teacher hire</li> <li>• Over 90 days: one (1) new teacher hire</li> </ul>	9/22	41%

These observations indicate a weakness with the selection and start date control procedures following the completion of the EBC process. Based on discussions with personnel in OHR, it is difficult for the EBC Unit to ensure the start of employment occurs only after EBC is completed because they rely on the compliance of hiring managers at the school/office. In addition, IA noted that there are no consequences for allowing an employee to start employment prior to completing their background check process, making it more difficult for OHR to enforce.

Department of Education  
Hiring Practices Review - Amended

Observations

<b>Impact</b>
<p>Lack of oversight and monitoring over the verification process may possibly lead to:</p> <ul style="list-style-type: none"><li>➤ Unsafe environments for students and staff which may lead to workplace violence and employee turnovers.</li><li>➤ Employees with a history of criminal activities working for the DOE.</li><li>➤ Reputational exposure for the DOE.</li><li>➤ Potential lawsuits which may lead to loss of funds to the DOE.</li></ul>
<b>Recommendation and Management Plan</b>
<p>Recommendations and management plans to address the lack of oversight and monitoring over the verification process include:</p> <ul style="list-style-type: none"><li>➤ <b>Recommendation:</b> Management should provide stronger guidelines to the field to include deadlines for submissions to OHR to allow OHR enough time to verify a new hire before the planned first day of employment.</li></ul> <p><b>Management Plan:</b> OHR will revise its <i>Interview and Selection Guidelines</i> that is posted on the DOE intranet to include instructions regarding the EBC process. This will include updating the instruction sheets <i>Steps for Teacher, EO, CSSP Interview Selection</i> to include specific timelines on the EBC process particular to each recruitment unit. Prior to the guidelines issuance, OHR will analyze the current requirements to identify potential process improvements.</p> <p><b>Anticipated Completion Date:</b> January 2017</p> <ul style="list-style-type: none"><li>➤ <b>Recommendation:</b> Management should enforce that all applicants must go through the EBC process prior to starting work.</li></ul> <p><b>Management Plan:</b> OHR will issue a memo to the field reminding hiring managers of the EBC requirements for all new salaried hires. OHR will also ensure that Personnel Regional Officers (PRO's) are prepared to deliver appropriate guidance within their assigned districts.</p> <p><b>Anticipated Completion Date:</b> January 2017</p> <ul style="list-style-type: none"><li>➤ <b>Recommendation:</b> Exceptions to this policy should be documented, and approved by Management.</li></ul> <p><b>Management Plan:</b> Information to request an exception to the policy will be included in the memo issued to hiring managers regarding the EBC requirements.</p> <p><b>Anticipated Completion Date:</b> January 2017</p>

Department of Education  
Hiring Practices Review - Amended

Observations

---

- **Recommendation:** Violation reports should be generated to document hiring offices that allow employees to start work prior to EBC verification and reviewed by Management.

**Management Plan:** OHR will generate an annual report that identifies which employees were allowed to work outside of the approved guidelines. The report parameters will be from July 1 to June 30 of each year.

**Anticipated Completion Date:** August 2017

- **Recommendation:** Management should consider creating consequences for violations and enforcement to encourage compliance.

**Management Plan:** OHR will share the annual violation report with the DOE's leadership team. The supervisor of the hiring manager that did not comply with the regulations can determine if a consequence may be warranted.

**Anticipated Completion Date:** August 2017

- **Recommendation:** Management should clarify "employees who work in close proximity to children" by specifically defining the positions that require an EBC.

**Management Plan:** If it is not clear whether a position's location or duties will bring an employee in close proximity with children, OHR will work with the hiring manager to determine if an EBC is required.

**Anticipated Completion Date:** January 2017

Contact Person: Kerry Tom, Director, Personnel Management Branch

**Responsible Office**

Personnel Management Branch, OHR

Department of Education  
Hiring Practices Review - Amended

**Observations**

**Observation Number: 2**

**Observation: Improvements needed for vacancy recruitment for EO subs and 89-day hires** **Rating: Low**

When an EO position becomes vacant, the hiring office is allowed to hire an EO sub to work in the position until the position is filled. Similarly, when a CSSP position becomes vacant, the hiring office is allowed to hire an 89-day hire. Based on inquiries with personnel in EO and CSSP Recruitment, there are no defined guidelines on the hiring of EO subs and 89-day hires. There are also no guidelines for term limitations for these temporary positions. For vacant EO positions, EO Recruitment does ask that the hiring office advertise internally once a year. For vacant CSSP positions, continuous recruitment is required for vacant positions with 89-day hires.

As of fieldwork date, the DOE had 17 EO subs and 300 89-day hires. For EO subs, samples to perform detailed testing were selected and for three (3) out of six (6) EO subs selected for testing, one (1) position has been vacant for over half a year (11/2/15 - 6/30/16) and two (2) positions have been vacant for almost one (1) year (7/16/15 - 6/30/16 and 7/1/15 - 5/30/16). Each respective hiring office has recruited for the vacant position within the year but has not selected a person to hire.

The following table summarizes the breakdown of 89-day hires.

# of Positions	# of Days Vacant	# of Months Vacant	# of Consecutive Terms	% of 89-Day Hires
84 Positions	90 Days	3 Months	1	28%
55 Positions	180 Days	6 Months	2	18%
78 Positions	270 Days	9 Months	3	26%
14 Positions	360 Days	12 Months	4	5%
20 Positions	450 Days	15 Months	5	7%
16 Positions	540 Days	18 Months	6	5%
15 Positions	630 Days	21 Months	7	5%
18 Positions	720 Days or more	24 Months or more	8+	6%

For the 89-day hires, samples were taken to perform detailed testing. Of the 10 89-day hires that have been in the same position for at least eight (8) consecutive terms that were selected for testing, all 10 positions have current or continuous recruitment postings.

On May 5, 2016, a House Bill impacting 89-day hires was transmitted to the Governor. House Bill No. 2008 states that *“no department shall temporarily employ any person for more than two consecutive terms of eighty-nine days; provided that with the approval of the governor, a department may temporarily employ a person for four consecutive terms of eighty-nine days or for twenty-four consecutive months. Any position filled by a temporary employee hired for a term of eighty-nine days and filled by that employee for more than twenty-four consecutive months shall be automatically abolished.”*



Department of Education  
Hiring Practices Review - Amended

*Observations*

---

<b>Impact</b>
<p>Lack of improvements to vacancy recruitment for EO subs and 89-day hires may possibly lead to:</p> <ul style="list-style-type: none"><li>➤ The risk of improper and inequitable hiring of applicants.</li><li>➤ Abuses of the hiring system to allow unqualified employees to substitute in a position until qualifications are met.</li><li>➤ Lack of the best pool of applicants to select from their job responsibilities.</li><li>➤ Loss of positions in the DOE which may lead to shortage of staff and overtime payments.</li></ul>
<b>Recommendation and Management Plan</b>
<p>Recommendations and management plans to address the lack of improvements to vacancy recruitment for EO subs and 89-day hires include:</p> <ul style="list-style-type: none"><li>➤ <b>Recommendation:</b> Management should consider revising and updating recruitment policies so that vacant EO positions are recruited more frequently.</li></ul> <p><b>Management Plan:</b> OHR will review and update procedures (where appropriate) for EO subs and make it similar to those in effect for classified 89-day hires. The procedures will include ensuring there is a Request to Fill (RTF) for the position, and/or it must be under active recruitment to be eligible to hire an EO sub.</p> <p><b>Anticipated Completion Date:</b> January 2017</p> <ul style="list-style-type: none"><li>➤ <b>Recommendation:</b> Recruitment offices should continue to actively monitor vacant positions to ensure that positions are filled in a timely manner.</li></ul> <p><b>Management Plan:</b> Management will continue to actively monitor vacant positions with 89-day hires or EO subs, and check if there is a RTF submitted or if the position is under active recruitment.</p> <p><b>Anticipated Completion Date:</b> Completed and Ongoing</p> <ul style="list-style-type: none"><li>➤ <b>Recommendation:</b> Management should consider developing guidance on actions to be taken on a position vacancy that has been vacant for a defined period of time.</li></ul> <p><b>Management Plan:</b> Management will develop guidelines for 89-day hires and EO subs that ensure hiring managers are actively recruiting for positions while an 89-day hire or EO sub is in the position.</p> <p>Management will continue to work with hiring managers to identify reasons a position may be hard-to-fill. Given the unique characteristics of most hard-to-fill positions, a standard process is not appropriate. However, OHR will note, in its Recruitment Guidance, the availability of OHR to consult with hiring managers. OHR continues to be proactive in identifying hard-to-fill classes of work that should be addressed by class-wide adjustments such as shortage differentials, etc.</p> <p><b>Anticipated Completion Date:</b> Completed and Ongoing</p>

Department of Education  
Hiring Practices Review - Amended

Observations

---

- **Recommendation:** If House Bill No. 2008 is passed, Management should create policies and procedures to limit the terms of 89-day hires.

**Management Plan:** House Bill 2008 was passed and became Act 246 on July 12, 2016, which limits the 89-day hire terms an individual may serve in a position. A memo with new guidelines and forms was released on July 22, 2016.

**Anticipated Completion Date:** Completed in July 2016

- **Recommendation:** Communication should be given to the field on the revised policies regarding recruitment, term limitations, actions on positions vacant for a long period of time, etc.

**Management Plan:** OHR will issue a memo to the field on any revised policies regarding recruitment, term limitations, and actions on positions vacant for a long period of time. OHR will also meet with the PRO's to assist in implementing any approved changes.

**Anticipated Completion Date:** Completed for new 89-day hire limitations; ongoing for future revisions.

Contact Person: Kerry Tom, Director, Personnel Management Branch

**Responsible Office**

Personnel Management Branch, OHR

Department of Education  
Hiring Practices Review - Amended

*Observations*

**Observation Number: 3**

**Observation: Proper forms and supporting documents are not always kept on file** **Rating: Low**

As part of EO Recruitment’s internal procedures, various forms and supporting documents are required to be completed and filed. The following table references the exceptions noted during our review, which indicated that proper forms and supporting documents are not always kept on file. Further details are provided in the ‘Summary of Observations Noted’ column.

Reference(s)	Summary of Observations Noted
<b>Request to Fill</b>	
<ul style="list-style-type: none"> <li>➤ Per the OHR EO flowchart, to start the recruitment process, the hiring office submits the “Request-to-Fill” form along with the approved Position Description (PD) to EO Recruitment by the posting deadline.</li> </ul>	<ul style="list-style-type: none"> <li>➤ The “Request to Fill” form was not on file for one (1) of the 25 new EO hires selected for testing.</li> </ul>
<b>Application Information (Fax)</b>	
<ul style="list-style-type: none"> <li>➤ Per Vacancy Announcements for Principal and Vice Principal positions, applications/resumes are not required. Only documentation of key information (i.e. name, present school/office, position and level, highest level of tenure as a school level EO, position applying for, and other contract information) is required.</li> </ul>	<ul style="list-style-type: none"> <li>➤ No application information (fax) was on file for five (5) of the 25 new EO hires selected for testing.</li> </ul>
<b>School Level Screening Worksheet</b>	
<ul style="list-style-type: none"> <li>➤ EO Recruitment uses the "School Level Screening Worksheet" to assist with screening and prioritizing applicants.</li> </ul>	<ul style="list-style-type: none"> <li>➤ The "School Level Screening Worksheet" was not on file for five (5) of the 25 new EO hires selected for testing.</li> </ul>

Based on discussions with EO Recruitment personnel, recruitment documents for EO positions are manually kept in the EO Recruitment office. IA noted that recruitment documents are stored electronically in File Net or eHR for both Teacher Recruitment and CSSP Recruitment. However, due to union issues, EO Recruitment has not been able to utilize its online recruitment module for EO’s that would result in electronic retention.

Department of Education  
Hiring Practices Review - Amended

*Observations*

---

<b>Impact</b>
<p>Proper forms and supporting documents not always kept on file may possibly lead to:</p> <ul style="list-style-type: none"><li>➤ The prevention of others from monitoring the EO recruitment process.</li><li>➤ Non-compliance of requirements for EO recruitment.</li><li>➤ The increased risk of improper hiring of applicants.</li><li>➤ Inconsistencies between practices and procedures. Such inconsistencies could result in wasted resources and financial loss to the DOE.</li></ul>
<b>Recommendation and Management Plan</b>
<p>Recommendation and management plan to address proper forms and supporting documents not always kept on file include:</p> <ul style="list-style-type: none"><li>➤ <b>Recommendation:</b> Management should continue to work with the union to allow EO Recruitment to implement an electronic recruitment process in eHR, thereby resulting in electronic maintenance of all records in eHR.</li></ul> <p><b>Management Plan:</b> OHR subsequently met with the Hawaii Government Employees Association (HGEA) to discuss the implementation and rollout of the online application process for Principal and Vice Principal Recruitment. As a result of that discussion, the DOE informed the HGEA that the online recruitment process would commence on September 1, 2016. Once this process is fully implemented, all forms and documents will be electronically maintained in eHR.</p> <p><b>Anticipated Completion Date:</b> November 2016</p> <p><u>Contact Person:</u> Kerry Tom, Director, Personnel Management Branch</p>
<b>Responsible Office</b>
Personnel Management Branch, OHR

Department of Education  
Hiring Practices Review - Amended

*Acknowledgements*

---

We wish to express our appreciation for the cooperation and assistance afforded to the review team by Management and staff during the course of this review.