

**STATUS OF IMPLEMENTING DEPARTMENT OF AUDIT REPORT RECOMMENDATIONS**

**Audit Title:** Milwaukee County Can Benefit from a Contemporary, Comprehensive Workforce Diversity Policy

**File Number:** 14-666/18-136

**Audit Date:** August 2014

**Status Report Date:** June 2019

**Department:** Human Resources

Number & Recommendation	Deadlines Established		Deadlines Achieved		Implementation Status		Auditee Comments
	Yes	No	Yes	No	Completed	Further Action Required	

<p><b>DHR management should build on its current efforts to develop a Diversity Committee mission statement by developing of a comprehensive Milwaukee County workforce diversity policy.</b></p> <p><b>In developing an updated, contemporary workforce diversity policy for Milwaukee County, DHR management should address, at a minimum, the following issues identified in this report:</b></p> <ol style="list-style-type: none"> <li>1. Proper classification of Milwaukee County's positions into appropriate EEO-4 job categories, based on consistent application of criteria established with meaningful input from operations management.</li> <li>2. Selection of appropriate criteria for evaluating underutilization of minority and women participation in the eight EEO-4 job categories in Milwaukee County's workforce. Three accepted methods were demonstrated in this audit. They are commonly referred to as the: <ul style="list-style-type: none"> <li>• Any Difference Rule;</li> <li>• One Whole Person Rule; and</li> <li>• 80% of Availability Rule.</li> </ul> </li> </ol>					X	X	<p>Owner/s: HR Leadership</p> <p>Owner/s: Compensation and HRIS</p> <p>(1) EEO – 4 codes are updated within the payroll system. In December 2017, a request for further information was sent to a specified list of employees who need to update their ethnicity based on new categories that were added by the government.</p> <p>Owner/s: HRIS</p> <p>(2) The former Benefits Director developed and maintained a quarterly reporting mechanism that indicated women/minority utilization broken down by departments of at least 30 employees, for each EEO-4 job category up until his departure. Until that position is filled, the new Benefits Manager will continue to report out these metrics.</p> <p><b><u>December 2018 Update:</u></b> This report is run yearly by the Director of Benefits.</p>
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							<p><b><u>June 2019 Update:</u></b>                      A quarterly reporting mechanism has been developed and maintained by the Benefits team. The report indicates women/minority utilization broken down by departments of at least 30 employees, for each EEO-4 job category. The Benefits department will continue to report out on these metrics.</p>
<p>3. Determination of the appropriate level at which workforce diversity goals should be established and achievement monitored. This could involve viewing the County workforce opportunities to establish meaningful workforce diversity goals across organizational units, rather than relying on traditional departmental structures, regardless of size or workforce composition, establishing individual goals.</p>	X					X	<p>Owner/s:                      (3) HRIS, Airport Director                      (4) &amp; (5) HRIS</p> <p>(3) – (5) Milwaukee County currently houses clean and accurate data within the HPW system. The EEO indicators in HPW will aid with running reports and assist with workforce planning as needed. Formal goals were to be implemented and monitored in detail upon the hiring of the Diversity &amp; Inclusion Program Manager position in HR, however, due to budget challenges this position was not funded. Milwaukee County's main objective regarding a diverse workforce is to meet and exceed the government workforce benchmark for diversity, however, these objectives continue to meet obstacles due to continuous turnover in leadership roles. Consistent turnover within the director level position makes their primary focus the continued operation of the division. Diversity Goals - GMIA falls underneath the general EEO/Diversity commitment of the County and follows the same diversity goals.</p> <p><b><u>August 2018 Update:</u></b></p>

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							<p>(3) Milwaukee County is committed to building and sustaining a workplace environment that supports diversity and inclusion. As such, we are stanch in our efforts to recruitment and retain diverse individuals throughout the County.</p> <p>To pilot this effort, General Mitchell International Airport (GMIA) and the Department of Human Resources will work together to increase the number of underrepresented minorities across all airport roles. Together, we are dedicated to being an employer of choice that encompasses a workforce that is reflective of our diverse communities. We are further committed to establishing an inclusive culture that demonstrates a thriving working environment built on trust and collaboration.</p> <p>Pilot Overview</p> <p>Human Recourses Business Partners (HRBPs) and the Airport Director will develop a Diversity and Inclusion Advisory Committee/Workgroup to determine the appropriate diversity workforce recruitment goals relative to candidate pool and applicant flow. By focusing our efforts on the candidate pool and applicant flow, we aspire to meet and exceed the government workforce benchmark for diversity.</p> <p>Initial Pilot Objective:</p> <ol style="list-style-type: none"> <li>1. Create a committee aimed at increasing a diverse candidate pool and applicant flow. The committee will consist include: HRBPs, Employment Staffing Manager, Airport Director, and others committed to increasing workforce diversity at GMIA.</li> <li>2. Establish Diversity &amp; Inclusion vision and mission statement to serve as a platform of the workforce recruitment efforts.</li> <li>3. Analyze current workforce demographics to identify</li> </ol>
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							<p>targeted diversity goals.</p> <p><b>Key Goals:</b></p> <ol style="list-style-type: none"> <li>1. Diversify resources for job posting. Identify publications with a diverse readership and membership, to advertise GMIA job openings.</li> <li>2. Research and partner with local and national organizations that focus on workforce diversity, including candidate sourcing/hiring best practices. Participate and job and hiring events that focus on attracting diverse candidates.</li> <li>3. Continuously collect and analyze applicant data to determine whether targeted recruitment efforts are achieving expected results and reflecting the race/gender population of the surrounding community.</li> <li>4. Coordinate recruitment strategies (to be determined) to maximize the ability to recruit from a diverse, broad spectrum of potential applicants. This could include strategically writing job descriptions to ensure job descriptions are inclusive of all and do not have a gender bias. Use gender-neutral titles in job descriptions, check pronouns and use “s/he. Lastly, be aware that words such as “Analyze” and Determine” are typically associated with male traits, while ‘collaborative” and “support” are typically considered female. (Glassdoor Team May 9, 2017)</li> </ol> <p><b>Target Dates:</b></p> <p>Anticipated completion of Initial Objectives: December 2018</p> <p>Anticipated completion of Key Goals: December 2019</p> <p><b><u>December 2018 Update:</u></b></p> <p>The initial objectives for the GMIA Diversity and Inclusion pilot were achieved. The pilot program consisted of three</p>
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<p>4. Establishment of a process for developing, refining and updating appropriate Relevant Labor Market data for use in establishing workforce diversity goals and monitoring achievement.</p>						<p align="center">X</p>	<p>(3) objectives: 1) Create a committee aimed at increasing diversity in the GMIA candidate flow and applicant pool, 2) Establish guiding principles and values to serve as a platform for recruitment activities, and 3) Analyze current workforce demographics to identify targeted diversity goals. The initial objectives led to the realization that women and people of color in positions at GMIA are below the national average. The establishment of the committee is to work on key goals, or activities geared at increasing diversity at GMIA.</p> <p><b>June 2019 Update:</b>                      Building from the completion of the 2018 Initial Objectives, the GMIA Diversity and Inclusion Committee is working on the 2019 Key Goals as identified in the last report. The GMIA Diversity and Inclusion Committee adopted the following guiding principles:</p> <ol style="list-style-type: none"> <li>1. We will commit ourselves to review our recruitment material, including our job posting, to ensure the language is more inclusive</li> <li>2. We will change the narrative for people of color and women as it relates employment opportunities at the GMIA</li> <li>3. We will increase our outreach and seek non-traditional job posting resources to attract people of color and women</li> <li>4. We will partner with and educate hiring managers to review diverse applicants and candidates</li> </ol> <p>The guiding principles help focus our efforts on diversifying the applicant pool and candidate flow at the airport. The principles will also assist in determining appropriate workforce diversity goals. To increase interest in available jobs, and by using the guiding principles as</p>
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<p>5. Development of strategies flowing from the County's workforce diversity policy to promote operations management's awareness, understanding and application of Milwaukee County workforce diversity principles.</p>						<p align="center">X</p>	<p>our compass, the GMIA Diversity and Inclusion Committee, began focusing efforts on two (2) key areas: 1) Diversify resources for job posting. Identify publications, with diverse readership and membership, to advertise GMIA job openings and 2) Coordinate recruitment strategies to maximize the ability to recruit from a diverse, broad spectrum of potential applicants. (Strategically writing job descriptions/postings to ensure they are inclusive and do not have a gender bias.)</p> <p>The Committee is currently researching publications, with diverse readership and membership to advertise job openings. The goal is to take a non-traditional approach to attracting diverse talent. In addition, the Committee met to review current job postings and job descriptions/JEQs. Several actions have been taken, including reviewing and comparing job descriptions for similar jobs across other airports and making modification recommendations to current GMIA posting to ensure they are inclusive to women and people of color.</p> <p><b><u>December 2018 Update:</u></b> Further investigation and research are needed.</p> <p><b><u>June 2019 Update:</u></b> The Department of Human Resources will be hiring a Diversity and Inclusion Manager to assist in County's efforts to promote inclusion and awareness across all departments. The manager will work to develop strategies, in concert with OAAA, to ensure the County's workforce policy is consistent with the Racial Equity work of the County and to help managers understand and</p>
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							apply the workforce diversity principles.

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<p>DHR management should convene a workgroup, including staff from Human Resources, Payroll and Information Technology, to address EEO data collection, maintenance and reporting issues identified in this report.</p> <p>EEO data collection, maintenance and reporting problems surfaced during the County's conversion from its predecessor payroll system, Genesys, to its current Human Resource Information System, Ceridian. Exacerbating these problems were significant staff turnover in key management positions in such areas as Information Technology, Payroll, and Human Resources. A workgroup comprising management from each of those areas should, at a minimum:</p> <p>6. Re-examine the County's process for collecting, maintaining and reporting EEO data with the express purpose of complying with applicable EEO-4 reporting requirements.</p>					X		<p>Owner/s: Payroll, Central HR, Compensation</p> <p>The New Employee Orientation was launched June 2015, and allows employees an opportunity to provide their EEO data to meet reporting requirements.</p>
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7. Ensure compatibility between racial/ethnicity source documents (e.g., 7-category EEO-1 vs. 5-category EEO-4 classification systems). This will also require updating if/when a pending EEOC reporting change is finalized.					X		Owner/s: Central Payroll, Compensation This issue was resolved in 2014-2015
8. Ensure compatibility of data fields and drop-down menus (e.g., current job groups, a sub-set of HPW's EEO-4 job categories, consist of EEO-1 classifications).					X		Owner/s: Compensation, HRIS (7) – (8) The Personnel Action Form (PAF) has been used countywide since 2015.
9. Ensure that, if EEO-1 data is determined to be useful for compensation benchmarking purposes, there is an automated cross-walk that avoids duplicate classification of positions and produces valid, consistent results when queried.					X		Owner/s: HRIS EEO – 4 Classifications are being used consistently to build reports as seen in (2). <b>Data entry access-</b> Data entry access in HR has been limited to improve security and reduce the chance of error. <b>Using Data to monitor diversity</b> – quarterly reports to monitor diversity were up until the departure of the former Director of Benefits. The 2017 annual report will be available in February 2018. <b>Quarterly metrics updates</b> – See above

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<p><b>DHR management should work with management at General Mitchell International Airport to devise a specific strategy to emphasize a commitment to increasing the diversity of the GMIA workforce, in both minority and female categories of employees.</b></p> <p><b>In developing such a strategy, particular attention should be paid to:</b></p> <p>10. Working in a manner consistent with, and in harmony with, the efforts undertaken on a Countywide basis in recommendation No. 5.</p>						<p align="center">X</p>	<p>Owner/s: HRPPs</p> <p>HR developed an initial Diversity &amp; Inclusion strategy, and in both the 2016 and 2017 budgets HR requested approval to add a dedicated resource focused on Diversity &amp; Inclusion at the County to implement it. These requests were not approved by the County Board for budgetary reasons. Should such a resource be approved in a future budget, we would be positioned to broaden our Diversity &amp; Inclusion strategy. Despite limited resources, HR expanded its Diversity recruitment efforts by expanding its job posting to veteran and non-profit organizations. The HR Business Partners will be working with the new Airport Director in reviewing workforce diversity and developing new strategies to attract, retain, develop and retain diverse talent at the Airport. Over the past 12 months, HR has been closely engaged in the interviewing and selection process, to ensure behavioral-based interviews are conducted and hiring decisions are made in a consistent manner. In addition, HR established a 2018 initiative to collaborate closely with management at General Mitchell International Airport to devise strategies to increase employment diversity, particularly in the hiring of women and minorities.</p> <p><b>Interviewing-</b> HR has continued to train and coach management to conduct behavioral based interviews, including documentation of interviews and hiring decisions. General Mitchell International Airport management also participated in a class called Interviewing methodology which was led by the Employee Relations Director starting in 2015.</p>
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<p>11. Maintaining and retaining additional detail documenting steps within the hiring process at GMIA (e.g., who was contacted for an interview, questions asked during interviews, etc.).</p>						<p align="center">X</p>	<p><b><u>December 2018 Update:</u></b>            Currently, there is no dedicated Diversity and Inclusion resources at Milwaukee County. Despite limited resources, HR continues to expand diversity recruitment efforts, including posting to attract veterans. Job postings have also been expanded to several non-profit organizations. During the GMIA Diversity and Inclusion pilot, HR and the Airport will focus efforts on diversifying the candidate pool and applicant flow. In 2019, HR Business Partners and Talent Acquisitions to develop workforce diversity strategies (see 2019 Key Goals) to attract diverse candidates. In addition, HR will continue to work with Airport leaders on behavioral interviewing techniques. If a need is determined, and based on the number of new leaders at the Airport, HR will incorporate an updated behavioral interviewing training in 2019.</p> <p><b><u>June 2019 Update:</u></b>            GMIA leadership, HR Business Partners and Talent Acquisition are working collectively to develop workforce diversity strategies (see 2019 Key Goals) to attract diverse candidates. In addition, HR will continue to work with Airport leaders on writing inclusive and gender bias job postings as well as behavioral interviewing techniques inclusive to all demographics. If a need is determined and based on the number of new leaders at the Airport, HR will incorporate an updated behavioral interviewing training in 2019.</p> <p>Owners/s: DOT Management HRBPs  <b>Interview Documentation</b> - Information about who</p>
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<p>12. Assigning responsibility at DHR for monitoring GMIA promotions and terminations for racial/ethnicity and gender disparities, and to discuss the results of such monitoring with GMIA management on an annual basis.</p>						<p align="center">X</p>	<p>applied, qualified for the position and who is contacted for interviews is tracked in the LMS system. Managers currently maintain files with their interviewing documents that include questions, answer key, scores and notes of each manager on the interviewing panel. Beginning February 2018 HR will require all interview documents - including questions, scoring sheets and any supporting notes - be given to HR and filed within the HR department. This will be for all full-time regular positions. This will not include seasonal or temporary assignment positions.</p> <p><b><u>December 2018 Update:</u></b> The review of interview documentation and tracking in LMS will continue into 2019.</p> <p><b><u>June 2019 Update:</u></b> Interview documentation and tracking continues in Learning Management System (LMS). As a part of the 2019 Key Goals, additional interview training for leaders may be initiated.</p> <p>Owners/s: DOT Management HRBPs</p> <p>The designated Human Resources Business Partners for GMIA are assigned the responsibilities for monitoring promotions and terminations for racial / ethnicity and gender disparities and are reporting the results on an annual basis. As of this Quarter 2016 and 2017 have been reported to management.</p> <p>The LEAD program designed in 2014 and implemented in 2015 &amp; 2016 was not offered in 2017 due to resource limitations within HR. It is our hope to revive the program</p>
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							<p>once our resources can be aligned to this initiative. HR has offered Unconscious Bias training to managers who participate in the Leadership Excellence Program.</p> <p>The behavioral based interviewing methodology is currently being utilized across DOT, including GMIA, with success. The Employee Relations Director was coaching the GMIA Director and closely monitoring the hiring and termination practices at the Airport; however, he resigned mid-2017. The new Employee Relations Director, once hired, will continue with this practice, along with the HR team that supports GMIA.</p> <p><b><u>December 2018 Update:</u></b> The new Employee Relations Director was hired in June 2018. In Fall 2018, the Employee Relations Director worked with the HR Business Partners and Airport leadership to develop a Diversity and Inclusion pilot at GMIA. The pilot overview is as follows:</p> <p><b>Pilot Overview</b> HR Business Partners and the Airport Director will develop a Diversity and Inclusion Advisory Committee/Workgroup to determine the appropriate diversity workforce recruitment goals relative to candidate pool and applicant flow. By focusing our efforts on the candidate pool and applicant flow, we aspire to meet and exceed the government workforce benchmark for diversity. The advisory committee was developed consisting of employees from HR and the airport all committed to increasing diversity within the candidate pool and applicant flow.</p>
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							<p>The kick-off meeting of this committee was held in November 2018. The group reviewed established 2018 objectives and reviewed current demographic data. Based on the data, GMIA is male-dominated in all job classifications, with the exception of Administrative roles. In addition, only 25% of the roles at GMIA are currently occupied by people of color, slightly lower than the US workforce. In addition to reviewing current employee data, the committee went through a Diversity and Inclusion visioning and values workshop to better understand the business implications of having a diverse and inclusive workforce. The work of the committee will continue into 2019 to meet the key goals and activities to diversify the GMIA candidate pool and applicant flow.</p> <p><b><u>June 2019 Update:</u></b>                      The pilot program is operational. The GMIA Diversity and Inclusion Committee continues to meet to address 2019 Key Goals and create a diverse and inclusive workforce at GMIA. Currently, recruitment efforts are focused on two (2) of the most popular and frequently vacant positions at the GMIA: Airport Maintenance Workers/Assistants and Airport Operations Coordinators I and II. We are monitoring the hire and turnover data for these areas and working to make changes in how and where we advertise for these positions. The Committee is tasked with researching publications, with diverse readership and membership to advertise job openings. In addition, the Committee met to review current job postings and job descriptions/JEQs to ensure language is inclusive. Our goal is to have updated job postings in Q3.</p>
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