

## STATUS OF IMPLEMENTATION – AUDIT SERVICES DIVISION REPORT RECOMMENDATIONS

**Audit Report Title:** Pulling Back the Curtain: A Look at Milwaukee County's Workforce Through Racial and Gender Equity Lenses from 2009 - 2019

**File Number:** 20-205  
**Status Report Date:** June 2024

**Audit Issued:** February 2020  
**Department:** Human Resources

### Open Recommendations

| Recommendation #3   |   |
|---|---|
| <b>Recommendation - February 2020</b><br>Review, update and distribute all relevant diversity AMOPs (e.g. Diversity and Inclusion, Equal Employment Opportunity, Hiring for a Vacant Position). |   |
| <b>Deadlines Established Y/N?</b> No  |   |
| Date  | Management Comments:  |
| Current – June 2024   | <b>DHR Update:</b><br>The Talent Acquisition team will be adding a new link resource to the AMOP for the third quarter. The Hiring Manager Toolkit has been designed to assist leaders in the recruiting process by providing best practices and useful guidance.<br>This toolkit includes invaluable resources on various aspects of recruitment, such as interviewing tips, sourcing strategies, creating an equitable process, civil service overview, and samples of interview guides. We believe that these tools will help streamline the recruitment process and ensure a more effective and efficient hiring process.<br><br><b>The DEI team will be adding updates to the D&amp;I AMOP for the third quarter 2024.</b><br><br><b>ASD Note:</b> Provided that recommendation #3 is fully implemented within the next six months, no future status report submissions will be submitted. |
| December 2023   | <b>DHR Update:</b><br>Draft AMOP update will be available in 1 <sup>st</sup> Qtr. 2024  |



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| Audit response – February 2020 | The HR Analyst has been working directly with the DHR D&I Program Manager to facilitate the revision of the EEO and Diversity and Inclusion AMOP. The DHR D&I Program Manager completed revisions to the EEO AMOP. The new EEO AMOP was then peer reviewed by representatives from DHR-Employee Relations, the Office of African American Affairs and the Office of People with Disabilities. The EEO AMOP is currently being considered by the Milwaukee County Review Board. The DHR D&I Program Manager is also revising the Diversity & Inclusion AMOP to align to both the new County Strategic Plan and the Diversity and Inclusion Strategic plan. This is expected to be completed by December 31, 2020. |
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### Newly Closed Recommendations

| Recommendation #2   |   |
|---|---|
| <b>Recommendation - February 2020</b><br>Set up a system to regularly monitor the variance in salaries by race and analyze the data to determine the cause. Once cause has been determined, establish appropriate steps to eliminate the variance and report actions to County leadership and policymakers. |   |
| <b>Deadlines Established Y/N?</b>   | No  |
| <b>Date</b>   | <b>Management Comments:</b>   |
| Current – June 2024   | <p>The Department of Human Resources has recently made significant strides within the Compensation Department as part of the ongoing Compensation Transformation Project. In March 2024, a new Director of Total Rewards was appointed, followed by the recruitment of an HR Compensation Manager in June. These strategic hires are pivotal in ensuring the efficient design and delivery of the compensation structure.</p> <p>These additions have facilitated a comprehensive review and realignment of salaries and pay grades within the organization. With enhanced tools and resources at our disposal, we have been able to identify and address salary discrepancies more effectively.</p> <p>The Compensation Transformation project is well underway, with numerous salary and pay grade adjustments already implemented. Additionally, new job families have been established, and a substantial portion of employees have received salary increases commensurate with prevailing market rates and conditions. We are presently advancing into Phase 2 of this multifaceted initiative, which is anticipated to span the next several years.</p> <p>Throughout this process, the Division of Compensation remains committed to providing salary recommendations that reflect both market benchmarks and internal equity considerations. Moreover, we are steadfast in our commitment to scrutinize any disparities</p> |

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|               | based on factors such as race and other protected classes, ensuring fairness and inclusivity across the board.   |
| December 2023 | <b>DHR Update:</b> The new compensation structure and new leader will be a prerequisite for any further updates in this space.   |
| June 2023     | <b>DHR Update:</b><br>The Department of Human Resources hired a Workforce Data Analyst to help monitor workforce data. The Workforce Data Analyst has been working to analyze data to ensure data integrity, including salary data as it relates to race and gender. As a part of the Compensation Transformation Project, salaries and grades will be reviewed and reassigned. At the completion of the reassignment, the Department of Human Resources, Division of Compensation, will create a process to regularly monitor variances in salaries. The Division of Compensation considered using the Compensation Module in Dayforce to help monitor salary variances. Due to a delay in implementation, and the plan to restructure the current compensation structure, the module is not in use. It has been determined the new compensation structure must be in place first, including new grade structure and guidelines on how to determine salaries and appropriate ways to differentiate salaries, as necessary. Once this is complete, a regular monitoring system can be implemented. Until such time, the Division of Compensation will continue to make salary recommendations based on market rates and internal equity. They will review any unexplained variances based on race and other protected classes. |
| December 2022 | Implementation of the Compensation Module has been further delayed given other ERP commitments and the resources required to manage this implementation. HR has hired a Data Analytics Coordinator in 2022 and she will be included in the development of reporting capabilities with the new module as well as with the current suite of modules to enhance visibility in this area.  |
| June 2022     | Regular system reporting capabilities are still in development with respect to internal equity. The Compensation module of Dayforce is still on track for 2022 implementation. As the Compensation module's capabilities are determined, a re-emphasis on general reporting will occur if necessary.   |
| December 2021 | Regular system reporting capabilities are still in development with respect to internal equity. Capabilities associated with a new Compensation module of Dayforce are being explored for 2022 implementation. As the Compensation module's capabilities are determined, a re-emphasis on general reporting will occur , with review by end of 1 <sup>st</sup> Qtr. 2022.  |

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| June 2021                      | Phase 1 implementation of Dayforce (i.e. Payroll/HRIS) was completed in Q1. Comptroller/Payroll Division and DHR/Compensation & HRIS Division have been gaining familiarity utilizing this new instance of Dayforce and its supporting process flows to facilitate Payroll functionality as well as employing it as the ongoing repository for County HRIS data. Standard reporting in the area of internal equity is now being conceptualized and the initial version(s) of report(s) will be built out with the assistance of IMSD by end of Q3. Resulting output will be distilled and forwarded to Leadership. This data will be used to construct options for enhancing the County’s internal equity with respect to pay. Selected initial actions will be implemented by EOY with follow-on actions to be developed for continuous improvement in this area in future years. |
| December 2020                  | Dayforce transition is on track – reporting capabilities with respect to this objective will be vetted in the new system after go-live beginning December 27, 2020.  |
| Audit response – February 2020 | DHR has actively been working on the migration of technology platforms that will allow for robust reporting on these key employee demographics. The system (Ceridian Dayforce) is expected to go live by 4 <sup>th</sup> quarter 2020. DHR will develop and implement a data analysis and report structure in 1 <sup>st</sup> quarter 2021 that regularly monitors and reports the information to leadership and policymakers. The Ceridian Dayforce project is 52% complete and is on schedule for a December 2020 go-live.   |

### Closed Recommendations

| Recommendation #1  |   |                                  |                   |                                  |     |       |     |                           |     |
|--|---|----------------------------------|-------------------|----------------------------------|-----|-------|-----|---------------------------|-----|
| <b>Recommendation - February 2020</b><br>Work with County agencies that are outliers in both directions for both racial groups and gender to formulate a plan to diversify their staffing. |   |                                  |                   |                                  |     |       |     |                           |     |
| <b>Deadlines Established Y/N?</b>  | No  |                                  |                   |                                  |     |       |     |                           |     |
| <b>Date</b>  | <b>Management Comments:</b>   |                                  |                   |                                  |     |       |     |                           |     |
| December 2023  | <p><b>DHR Update:</b> The DHR TA team continues to work with the Zoo and Parks departments (outlier groups) on diversifying their teams, utilizing the Hiring Event model ( protocols attached) and our broad outreach schema. 2023 numbers improvements:</p> <table border="1"> <thead> <tr> <th>New Hires by Race/Ethnicity 2023</th><th>Increase for 2023</th></tr> </thead> <tbody> <tr> <td>American Indian or Alaska Native</td><td>11%</td></tr> <tr> <td>Asian</td><td>41%</td></tr> <tr> <td>Black or African American</td><td>63%</td></tr> </tbody> </table> | New Hires by Race/Ethnicity 2023 | Increase for 2023 | American Indian or Alaska Native | 11% | Asian | 41% | Black or African American | 63% |
| New Hires by Race/Ethnicity 2023   | Increase for 2023   |                                  |                   |                                  |     |       |     |                           |     |
| American Indian or Alaska Native   | 11%   |                                  |                   |                                  |     |       |     |                           |     |
| Asian  | 41%   |                                  |                   |                                  |     |       |     |                           |     |
| Black or African American  | 63%   |                                  |                   |                                  |     |       |     |                           |     |

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|--|--|--------------------|------|-------------------|------|---|---|---|------|---|------|--------------------------------|----|------|----|------|--|-----|-------|-----|-------|--------------------|----|------|----|-------|--|---|------|---|------|--|----|------|----|------|
|  | <table><tr><td>Hispanic or Latino</td><td>32%</td></tr><tr><td>Two or More Races</td><td>35%</td></tr></table>   | Hispanic or Latino | 32%  | Two or More Races | 35%  |   |   |   |      |   |      |                                |    |      |    |      |  |     |       |     |       |                    |    |      |    |       |  |   |      |   |      |  |    |      |    |      |
| Hispanic or Latino   | 32%  |                    |      |                   |      |   |   |   |      |   |      |                                |    |      |    |      |  |     |       |     |       |                    |    |      |    |       |  |   |      |   |      |  |    |      |    |      |
| Two or More Races  | 35%  |                    |      |                   |      |   |   |   |      |   |      |                                |    |      |    |      |  |     |       |     |       |                    |    |      |    |       |  |   |      |   |      |  |    |      |    |      |
|  | <p><b><u>Audit Services Division Comments:</u></b></p> <p><i>This item is closed with the understanding that DHR will continue to devote resources and monitor progress in this area, and also with consideration given to the creation of the Toolkit, which provides departments with resources to enhance their recruiting and hiring a diverse workforce.</i></p>  |                    |      |                   |      |   |   |   |      |   |      |                                |    |      |    |      |  |     |       |     |       |                    |    |      |    |       |  |   |      |   |      |  |    |      |    |      |
| June 2023  | <p>DHR Update:<br/>Working with IMSD to link “TA Strategy” document for universal manager only access.</p> <p>Talent Acquisition Diverse Recruiting Strategy from 2022 has flowed over to 2023 and we have increased New Hires by 31.6% increase in 2023 YTD when compared to 2022 YTD.</p> <p>For 2023 we have increased New hires in the specific following areas:</p> <table><tr><td>New Hires</td><td>2022</td><td>%</td><td>2023</td><td>%</td></tr><tr><td>American Indian or Alaska Native (not Hispanic or Latino)</td><td>5</td><td>0.9%</td><td>7</td><td>1.0%</td></tr><tr><td>Asian (not Hispanic or Latino)</td><td>12</td><td>2.2%</td><td>17</td><td>2.3%</td></tr><tr><td>Black or African American (not Hispanic or Latino)</td><td>118</td><td>21.5%</td><td>219</td><td>30.2%</td></tr><tr><td>Hispanic or Latino</td><td>45</td><td>8.2%</td><td>80</td><td>11.0%</td></tr><tr><td>Native Hawaiian or Other Pacific Islander (not Hispanic or Latino)</td><td>1</td><td>0.2%</td><td>1</td><td>0.1%</td></tr><tr><td>Two or More Races (not Hispanic or Latino)</td><td>13</td><td>2.4%</td><td>16</td><td>2.2%</td></tr></table> <p>We have attended and hosted 39 community events and hiring events YTD for 2023.</p> <p>We have Increased diverse applicant flow for the following areas:<br/>American Indian 47.6%, Asian 62% - Hispanic 38% - Black 53% - Native Hawaiian 84% and Two or more races 57%.</p> <p>Efforts were focused on Sponsoring Diverse Community events including: Pridefest, Mexican Fiesta, Puerto Rican Festival, UMOs Cervceros, and Hmong Chamber of Commerce Business Awards, Black Arts Fest, and Wisconsin Chinese Chamber of Commerce.</p> <p>Social Media strategy has continued to increase applicant flow of diverse applicants in the targeted areas of Hispanic, Asian, LGBTQ+ and Indigenous groups. Attending events and joining specific Diverse groups such as Asian Young Professionals of Milwaukee, HPGM, Hispanic professional of Greater Milwaukee, Wisconsin LGBT Chamber of Commerce,</p> | New Hires          | 2022 | %                 | 2023 | % | American Indian or Alaska Native (not Hispanic or Latino) | 5 | 0.9% | 7 | 1.0% | Asian (not Hispanic or Latino) | 12 | 2.2% | 17 | 2.3% | Black or African American (not Hispanic or Latino) | 118 | 21.5% | 219 | 30.2% | Hispanic or Latino | 45 | 8.2% | 80 | 11.0% | Native Hawaiian or Other Pacific Islander (not Hispanic or Latino) | 1 | 0.2% | 1 | 0.1% | Two or More Races (not Hispanic or Latino) | 13 | 2.4% | 16 | 2.2% |
| New Hires  | 2022   | %                  | 2023 | %                 |      |   |   |   |      |   |      |                                |    |      |    |      |  |     |       |     |       |                    |    |      |    |       |  |   |      |   |      |  |    |      |    |      |
| American Indian or Alaska Native (not Hispanic or Latino)          | 5  | 0.9%               | 7    | 1.0%              |      |   |   |   |      |   |      |                                |    |      |    |      |  |     |       |     |       |                    |    |      |    |       |  |   |      |   |      |  |    |      |    |      |
| Asian (not Hispanic or Latino)                                     | 12   | 2.2%               | 17   | 2.3%              |      |   |   |   |      |   |      |                                |    |      |    |      |  |     |       |     |       |                    |    |      |    |       |  |   |      |   |      |  |    |      |    |      |
| Black or African American (not Hispanic or Latino)                 | 118  | 21.5%              | 219  | 30.2%             |      |   |   |   |      |   |      |                                |    |      |    |      |  |     |       |     |       |                    |    |      |    |       |  |   |      |   |      |  |    |      |    |      |
| Hispanic or Latino   | 45   | 8.2%               | 80   | 11.0%             |      |   |   |   |      |   |      |                                |    |      |    |      |  |     |       |     |       |                    |    |      |    |       |  |   |      |   |      |  |    |      |    |      |
| Native Hawaiian or Other Pacific Islander (not Hispanic or Latino) | 1  | 0.2%               | 1    | 0.1%              |      |   |   |   |      |   |      |                                |    |      |    |      |  |     |       |     |       |                    |    |      |    |       |  |   |      |   |      |  |    |      |    |      |
| Two or More Races (not Hispanic or Latino)                         | 13   | 2.4%               | 16   | 2.2%              |      |   |   |   |      |   |      |                                |    |      |    |      |  |     |       |     |       |                    |    |      |    |       |  |   |      |   |      |  |    |      |    |      |

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|               | <p>Indians in Wisconsin, Indian/Desi Community in Milwaukee, Latinos in Milwaukee, Latinos Connect Milwaukee, Indian in and around Milwaukee and Puerto Rican Flags up on Facebook and in the community has helped us increase the applicant flow.</p> <p>The Talent Acquisition team has also added an additional Diversity Recruiter to the team. Currently, there are two Diversity Recruiters.</p> <p><b><u>Audit Services Division Comments:</u></b><br/> <i>Progress toward the foundational aspects of staffing diversification and increases in hiring of individuals within targeted groups is acknowledged. Efforts should also include the formulation of specific plans for outlier agencies.</i></p>   |
| December 2022 | <p>Talent Acquisition Diverse Recruiting Strategy increased Diverse NEW Hires for 2022-YTD by 82%. In 2022 YTD there has been 1,485 Diverse New Hires.</p> <p>Attended and hosted 47 community events and hiring events YTD for 2022.</p> <p>Increased diverse applicant flow for the following areas American Indian – 19%, Asian – 29% and Hispanic 8%.</p> <p>Sponsored Diverse Community events including: Pridefest, Mexican Fiesta, Puerto Rican Festival, UMOs Cervancieros, and Hmong Chamber of Commerce Business Awards.</p> <p>Social Media strategy has increased applicant flow of diverse applicants in the targeted areas of Hispanic, Asian and Indigenous groups. Attending events and joining specific Diverse groups such as Asian Young Professionals of Milwaukee, Indians in Wisconsin, Indian/Desi Community in Milwaukee, Latinos in Milwaukee, Latinos Connect Milwaukee, Indian in and around Milwaukee and Puerto Rican Flags up on Facebook and in the community has helped us increase the applicant flow. Interview guides were created for Zoo and Parks during the hiring events. Revised CRC interview guides for Hiring events.</p> |
| June 2022     | <p>Diversity Recruiter was hired to assist with diversifying the talent pool. TA Team has identified sourcing strategies to attract more diverse candidates for leadership roles. The focus for 2022 will be to increase applicant pool in the following areas: Hispanic, Asian and Indigenous. The TA Team has hosted several hiring events with the county.</p> <p><b><u>Audit Services Division Comments:</u></b><br/> <i>Progress toward the foundational aspects of staffing diversification is acknowledged. The next phase should include the formulation of specific plans for outlier agencies.</i></p>  |
| December 2021 | <p>TA Team is networking and socializing by joining diverse groups and on social platforms to help reduce the recruitment spend of paid job boards and create diverse talent pipelines. TA leadership will focus for the remainder of 2021 and into 2022 on employer branding, leading a workgroup from the CEX office and across all County agencies to implement our Employer Identity that encompasses our Mission-Vision-Values. As with a strong employer</p>  |

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|                                | brand it will increase our applicants-per-opening rate, and also improves the quality of our talent pool. The career page was enhanced to create a better candidate experience with the launch of the new Dayforce ATS which has also strengthened our employer brand. All metrics and tracking of impact will be calculated and the end of 1 <sup>st</sup> Qtr. 2022, then each Qtr. End throughout the year.  |
| June 2021                      | Currently working on strengthening our employee brand with social media thru diverse channels and community partners. Analyzed the demographics of each department and creating a strategy plan based on the data to be completed by end of third Quarter. Hired a new Talent Acquisition Manager (TAM) May 2021 who along with the Director, will meet with each dept./agency to formalize strategy, document plans and continuously update those plans on an ongoing basis.   |
| December 2020                  | We have worked with our vendor to identify close to 200 community partners to post positions. These diverse organizations will aid in ensuring that job postings are reaching diverse populations. A meeting will be planned for the 1 <sup>st</sup> quarter 2021 to work on a plan to best align these community organizations to job postings.  |
| Audit response – February 2020 | Auditee: In the first quarter of 2020, the talent acquisition team calculated the percentage of diverse employees in each department to identify current diversity. After calculating each number, we identified departments with a total percentage of diversity that was less than 20%. In the second quarter, recruiting challenges and opportunities for each department were reviewed. A targeted recruitment strategy will be developed for each department to help increase the diversity of the applicant pools by 3% for leadership (cabinet), Managers/supervisors (people leaders) and classified and support staff positions inclusive of all agencies. |

| Recommendation #4   |  |
|---|--|
| <b>Recommendation - February 2020</b><br>Conduct a review of all involuntary separations to determine if there is a reason for the disproportionate number of Black or African American employees or other racial groups. Devise a plan to work with managers to combat this trend. |  |
| <b>Deadlines Established Y/N?</b>   | No   |
| <b>Date</b>   | <b>Management Comments:</b>  |
| June 2022   | DHR Employee Relations continue to capture separation reasons by utilizing termination codes implemented in August 2021. We are exploring a process for sharing this information with department leaders for their awareness and consideration for continuous improvement opportunities. |




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| December 2021                  | <p>The new termination reason codes were implemented on August 1, 2021. During the period beginning August 1, 2021 through December 1, 2021 there were 21 involuntary terminations. Of the 21 involuntary terminations, 12 were Black or African American; 6 decline to provide ethnicity information; 2 were White (not Hispanic or Latino) and 1 was Hispanic or Latino.</p> <p>9 – Failure of Probationary Period<br/>         6 – Policy Rule Violation<br/>         2 – Performance<br/>         2 – Failed Testing during Training<br/>         1 – Non-Disciplinary<br/>         1 – Attendance</p> <p><b>Audit Services Division Comment:</b><br/> <i>We continue to see significant progress toward formalization of the process.</i></p> |
| June 2021                      | <p><b>See Appendix, Item #4 below.</b></p> <p>We have created new termination codes to provide specificity and greater clarity on the reason(s) employees exit (voluntary and involuntary) Milwaukee County. We expect to begin using the new codes on or about August 1st, 2021.</p>  |
| December 2020                  | <p>2020 Q1 and Q2 data was received and upon initial review of involuntary separations from the County, there appears to be a disproportionate number of African Americans employees and other racial groups that are involuntarily separated. A meeting will be scheduled in the fourth quarter of 2020, with members of the DHR leadership team to further review the data and develop a plan to combat this trend.</p>  |
| Audit response – February 2020 | <p>DHR will generate a report by September 30, with Q1 and 2 data and review. After reviewing, the Employee Relations team in collaboration with the DHR leadership team, will determine plan of action.</p>   |

| Recommendation #5  |   |
|--|---|
| <p><b>Recommendation – February 2020</b></p> <p>Work to establish a toolkit for recruiting and hiring a diverse workforce to provide specific guidelines and train hiring managers on how to hire a diverse staff.</p> |   |
| <b>Deadlines Established Y/N?</b>  | Yes   |
| <b>Date</b>  | <b>Management Comments:</b>   |
| December 2023  | <p><b>DHR Update:</b> The Toolkit was released to the organization on September 6, 2023 at 11:17am. This will be a living document with expected updates as needed real time via the below link.</p> <p>Link to hiring tool kit:  <a href="#">MKEC Hiring Manager Tool Kit - 2023.docx</a></p> |
| June 2023  | <p>DHR Update:</p> <p>Working with IMSD to link "Toolkit" document for universal manager only access.</p>   |

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| December 2022                  | Talent Acquisition has updated the toolkit to include diverse strategies for hiring manager which include auditing job announcements, target sources where diverse candidates congregate, encourage diverse employees to refer openings, offer internships to targeted groups, rethink the factors that you screen for and using blind resumes. In August of 2022 we piloted our first interview training and will deliver for 2023 the interview training across Milwaukee County. |
| June 2022                      | Talent Acquisition is updating the toolkit to include diverse strategies for hiring manager. In August of 2022 will be offering interview training focused on unconscious bias. Social Media strategy has been implemented and targeted based on Hispanic, Asian and Indigenous groups.   |
| December 2021                  | Interview training and interview guides will be ready for role out in 2022. Dayforce ATS system was launched throughout the County. Diversity Recruiter was approved for 2022 budget. Social media, marketing and diversity recruiting plans are being developed to launch in 2022. TA team will broaden and analyze data to understand the Community and the market for quarter 4 to increase diversity in candidates.   |
| June 2021                      | Currently working with L&D to create interview training and interview guides for leaders in the new platform by the end of third quarter. Tool kit will be updated with social media strategies and interview guides in the new platform by the end of third quarter. Hired a new Talent Acquisition Manager (TAM) May 2021 who will communicate, facilitate, and measure the usage of the tool kit collateral on an ongoing basis.   |
| December 2020                  | In 1 <sup>st</sup> quarter of 2021, T&A will partner with diversity to create manager guides for interviews for recruiting tool kit.  |
| Audit response – February 2020 | DHR has developed a toolkit for recruiting and hiring a diverse workforce with specific guidelines and strategic actions for both the DHR teams and people managers. DHR has piloted a few strategies that will be included in the toolkit. L&D has started to train county departments hiring managers on biases/microaggressions (e.g. <i>Sensitivity for Supervisors/Managers</i> ).   |

| Recommendation #6  |  |
|--|--|
| <b>Recommendation - February 2020</b>  |  |
| Establish policies and procedures regarding the production, publication and retention of the biennial EEOC report. |  |
| <b>Deadlines Established Y/N?</b>  | No   |
| <b>Date</b>  | <b>Management Comments:</b>  |
| June 2023  | <p>DHR Update:</p> <p style="text-align: center;"><b><u>BENEFIT DIVISION – STEPS TO FILE EEO-4 REPORT PROCESS GUIDE</u></b></p> <p>Steps to File EEO4 Report</p> |

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|               | <ol style="list-style-type: none"><li>1. Milwaukee County receives an email from the Federal Government every 2 years (Odd years) to complete the Federally Regulated EEO4 Report. This notification is sent typically in September prior to due date. The email is currently being sent to Milwaukee County's Director of Benefits Administration from: EEO4 Filer Support &lt;<a href="mailto:eeo4filersupport@eeocdata.org">eeo4filersupport@eeocdata.org</a>&gt;<ul style="list-style-type: none"><li>➤ If the Director of Benefits Administration is unresponsive to the confirmation of this email or the email bounces back, the EEO4 Data Org. sends a letter to Milwaukee County requesting a new contact person for the EEO4 Report</li><li>➤ At any time, Milwaukee County can send a notification to the EEO4 Data Center informing them of a new contact at:<br/><b>EEO-4 Reporting Center</b><br/><b>P.O. Box 8127</b><br/><b>Reston, VA 20195</b></li></ul></li><li>2. Once we confirm the receipt of the email, a password is provided to input the County's data into the system<ul style="list-style-type: none"><li>➤ The notification from the EEO-4 Reporting Center can be somewhat fluid. The EEO-4 Reporting Center provides the letter with directions we must follow. Note: The process and directions can change every year. Please follow the directions provided in the notification.</li></ul></li><li>3. The Director of Benefits Administration forwards the provided EEO-4 Reporting Center's password to the Director of Payroll in the Milwaukee County's Payroll Department</li><li>4. The Director of Payroll reviews the requirements provided within the notification received from the Federal Government and inputs the data into their system</li><li>5. The EEO4 Data Center processes the data and sends a report to the Director of Benefits Administration or the Milwaukee County contact they have on file</li><li>6. Once the report is received, Director of Benefits Administration sends a copy of the report to the Grants Department and the Office of Equity</li></ol> <p style="text-align: center;"><b>This information is stored: H:\Benefits\EEO 4</b></p> |
| December 2022 | <p>Milwaukee County receives an email from the Federal Government every 2 years (Odd years) to complete the Federally Regulated EEO4 Report. This notification is sent typically in September prior to due date. The email is currently being sent to Tony Maze, Director of Benefits Administration from: EEO4 Filer Support &lt;<a href="mailto:eeo4filersupport@eeocdata.org">eeo4filersupport@eeocdata.org</a>&gt;</p> <p>If Tony Maze is unresponsive to the confirmation of this email or the email bounces back, the EEO4 Date Org. sends a letter to Milwaukee County requesting a new contact person for the EEO4 Report</p>   |

## STATUS OF IMPLEMENTATION – AUDIT SERVICES DIVISION REPORT RECOMMENDATIONS

**Audit Report Title:** Pulling Back the Curtain: A Look at Milwaukee County's Workforce Through Racial and Gender Equity Lenses from 2009 - 2019

**File Number:** 20-205  
**Status Report Date:** June 2024

**Audit Issued:** February 2020  
**Department:** Human Resources

|               |   |
|---------------|---|
|               | <p>At any time, Milwaukee County can send a notification to the EEO4 Data Center informing them of a new contact at:<br/> EEO-4 Reporting Center<br/> P.O. Box 8127<br/> Reston, VA 20195</p> <ol style="list-style-type: none"> <li>1. Once we confirm the receipt of the email, a password is provided to input the County's data into the system</li> <li>2. The password is provided to Sue Drummond in the Payroll Department</li> <li>3. Sue Drummond inputs the data into the system</li> <li>4. EEO4 Data Center processes the data and sends a report to Tony Maze or the Milwaukee County contact they have on file</li> <li>5. Once the report is received, Tony Maze sends a copy of the report to the Grants Department and the Office of Equity</li> </ol>  |
| June 2022     | <p>The Director of Benefits and the Director of Payroll is contacted via e-mail every two years by the Federal Government requesting Milwaukee County to provide data for that years EEO4 reporting. This request has a special code designated for Milwaukee County and a link we must enter our data in. This process is completely maintained and provided by the Federal Government. The Director of Benefits and the Director of Payroll works together to input the data into the link and we both receive confirmation the report has been filed and under review. If there are questions, we receive another email asking the question, or we receive an email informing us the report has been file with no issues. We receive a copy of the report two to three months later. Due to COVID, the reports have been pushed back to January, however, in prior years we had to file by October. Once we receive the completed report, the Director of Benefits provides a copy of the Completed EEO4 response report from the Federal Government to the Grants Department and the Audit Department.</p> <p><b><u>Audit Services Division Comments:</u></b><br/> <i>Although the process outlined above may currently be followed by County areas involved, we continue to see a benefit to having the process formally documented as committed to by DHR leadership in its management response to the recommendation. This can be essential with multi-department involvement and instances of staff turnover.</i></p> |
| December 2021 | <p>DHR reviewed the technology platform report capabilities which changed for 2020 and updated our procedures and guidelines to match the Federal EEO Guidelines. We used these new guidelines to make our report. It was submitted and no issues were reported. Ongoing, we will review the Federal Guidelines prior to completing the report to ensure we remain in compliance biannually. The next EEO4 report is due on January 4th, 2022. The Department of Human Resources will share the results with the County's Grant Department once they are received.</p> <p><b><u>Audit Services Division Comment:</u></b></p>  |

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|                                | <i>We are seeking written documentation of the process for the production, publication, and retention of the biennial EEOC report.</i>  |
| June 2021                      | <p>This action item should not be directed at DHR and will be omitted from this report. This EEOC report referenced here was created and is a work product of the Grants Department.</p> <p><b><u>Audit Services Division Comment:</u></b><br/> <i>This item is held open pending confirmation that the thrust of this recommendation is understood following the transfer of these responsibilities to the Department of Administrative Services - Grants &amp; Special Projects Unit.</i></p> |
| December 2020                  | DHR reviewed the technology platform report capabilities which changed for 2020 and updated our procedures and guidelines to match the Federal EEO Guidelines. We used these new guidelines to make our report. It was submitted and no issues were reported. Ongoing, we will review the Federal Guidelines prior to completing the report to ensure we remain in compliance biannually.   |
| Audit response – February 2020 | DHR is reviewing the technology platform report capabilities and is considering creation of an AMOP for completing and retaining the biennial EEOC report.  |

| Recommendation #7   |  |
|---|--|
| <b>Recommendation - February 2020</b><br>Evaluate whether manager diversity performance should be added to the annual performance evaluation process. |  |
| <b>Deadlines Established Y/N?</b>   | Yes  |
| Date  | Management Comments  |
| June 2022   | <p>The transition to the Dayforce Performance Management platform continues and will be fully deployed before the end of 2022. This technology will provide numerous benefits among them automating the process and providing the ability of leaders at all levels to implement diversity and inclusion goals, and other goals in alignment with County strategy. The goals module was deployed in March, and probationary reviews will be deployed in June. The annual review process module will be deployed in the fall.</p> <p>In addition, Milwaukee County is implementing an updated list of Core Competencies applicable to all employees. The performance of all employees receiving a probationary or annual review will be assessed against these six competencies. A competency related to diversity has been added to all performance evaluations. The diversity related competency is titled "Values Differences". It helps drive the expectation that all employees, including leaders, recognize the value that different perspectives and cultures bring to Milwaukee</p> |

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|                                | <p>County. County employees should also seek to understand different perspectives and cultures while contributing to a work climate where differences are valued and supported.</p> <p>In summary, the deployment of the Dayforce performance management technology greatly enhances Milwaukee County's ability to implement diversity related goals and competencies at all levels, improving the County's ability to achieve its diversity and inclusion objectives and other key strategies.</p>   |
| December 2021                  | <p>Significant changes to the performance management process are delayed due to the ongoing impact of the COVID-19 pandemic. A cross functional team is in the process of transitioning the current paper-based process to Dayforce, but any changes to the process are based on the requirements of the Dayforce technology. With significant resources needed to successfully launch the Dayforce platform in Q1, significant changes to the process will begin to be considered in Q2 2022, including reviewing the current process through a D&amp;I lens, as well as other improvements and enhancements.</p>  |
| June 2021                      | <p>New D&amp;I Program Manager started May 2021. He is presently reviewing all data and findings from earlier research and will determine next steps. Preparing for Phase 3 of Dayforce implementation of Dayforce platform for Performance Management.</p> <p><b><u>Audit Services Comment:</u></b><br/> <i>If not completed, the targeted implementation timeline should be communicated with the next status report update.</i></p>  |
| December 2020                  | <p>Special Note, implementation of performance changes has been postponed due to the impact of COVID-19.</p>  |
| Audit response – February 2020 | <p>The DHR Program Manager for Performance Management and Diversity and Inclusion met with management team across Milwaukee County during the 1<sup>st</sup> quarter of 2020. She captured input, data and feedback to assist in the redesign of the Performance Management Review process at Milwaukee County. During the 2<sup>nd</sup> quarter of the year a new Performance Evaluation form was created that included the Values and Objectives of Milwaukee County Strategic Plan. These included the following behaviors; Integrity, Respect, Excellence and Diversity &amp; Inclusion. After the transition of the County Executive Performance Evaluation form was adjusted to reflect the new Milwaukee County Values; Inclusion, Influence and Integrity. The Performance Evaluation form has been shared within HR and is scheduled to be delivered to the organization beginning November 2020 for use for managing performance from January 1, 2020 through December 31, 2021.</p> |

| Recommendation #8  |                             |
|--|-----------------------------|
| <b>Recommendation - February 2020</b><br>Update, publish and present County workforce data to policymakers annually. |                             |
| <b>Deadlines Established Y/N?</b>  | No                          |
| <b>Date</b>  | <b>Management Comments:</b> |

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| June 2022                      | Workforce Data is now published live to general public via the Strategy Dashboard on the Milwaukee County website. This data consists of race, gender, tenure length, separations, and racial and gender demographics of leadership.  |
| December 2021                  | The current Dayforce implementation was slower than expected. The Department of Human Resources (DHR) will begin reviewing and reporting on diversity and inclusion workforce data by Q2 2022, given the completion of the full system implementation. DHR continue to meet with IMSD staff to review system configuration and to determine the best way to capture this information and ensure workforce data integrity.   |
| June 2021                      | DHR will address reporting feature capabilities and build out post completion of Phase 2, targeted for August 2021. DHR will develop a report to share workforce data on a monthly basis as a standing item that is presented to the personnel committee and full board. This report will be public as it will be a board item. Annually the DHR will publish an annual diversity and inclusion report to be included as part of the HR budget narrative starting with the FY21 budget process. |
| December 2020                  | Dayforce transition is on track – reporting capabilities with respect to this objective will be vetted in the new system after go-live beginning December 27, 2020.   |
| Audit response – February 2020 | Annually the department of human resources will publish an annual diversity and inclusion report to be included as part of the HR budget narrative starting with the FY21 budget process.   |

### APPENDIX, ITEM #4

After review of the data available of **involuntary separations** from Milwaukee County from January 2, 2020 to September 30, 2020, there was a disproportionate number of African Americans employees and other racial groups that were involuntarily terminated.

- Total involuntary separations- 56 employees
- Significant percentage of employees separated during probation- 88%
- There is disparity among African American employees and other racial groups involuntarily separated
  - African American & other racial groups- 88%
  - African Americans- 68%
  - White- 13%
- Majority involuntarily separated are in entry level positions
  - Correctional Officers & Public Safety employees- 59% African American and other racial groups
    - 72% African American
  - Termination reasons during probation included:
    - Policy/Rules Violation 14
    - Attendance Related 8
    - LESB/ FTO /Required Training 7 (LESB 12-16 weeks)
    - Job Performance 4

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In reviewing the data, it was identified that we need better termination codes to indicate why employees were involuntarily separated from the County, including the reason for the termination, e.g. performance, attendance, policy violation, etc. There are employees who charges are filed to terminate their employment and they resign before their hearing is held. Those are noted in our HRIS as "resigned".

As a result of this discovery, HR will work in collaboration with Payroll, OCC and RPS to ensure termination codes are reviewed and created taking into consideration any applicable Ordinances/Resolutions, payout requirements or impact to pension payments to ensure proper procedures are followed.

In reviewing public safety closer given it was the largest number of involuntary separations during probationary period.

The action DHR will take to begin to close or eliminate the disproportionate number of African Americans employees and other racial groups that are involuntarily terminated, is to partner with department leaders and collaborate with other appropriate Departments to implement the following actions.

- There are a multitude of policies, Milwaukee County Ordinances, Work Rules, Administrative Orders, etc. that employees are required to be familiar with upon beginning their employment with Milwaukee County and to ensure their success, it is recommended that departments have scheduled sessions to review policies and work rules, etc. and ensure the employee has a good understanding of what is expected of them.
- It is important to ensure HR BPs are engaged in Internal Affairs or Corrective Action discussions and decisions to provide a racial equity lens and ensure all necessary support, resources, and discussions were had with employees to offer them a successful employment experience with Milwaukee County.
- Offer onboarding survey and review data regularly or conduct check-in's with new employees to begin discussions early on in their career with Milwaukee County to address their questions and to build effective relationships with their leader and HR. This includes regular leader 1:1's with their employees. This will allow for 1:1 discussion and may allow a more inviting environment for questions and clarifications. Identify what the specific needs are for each employee.