HIRING AUDIT CONSIDERATIONS

COMPPELLING NEEDS TO REDUCE UCM LIABILITY AND EXPOSURE AND TO ENSURE THAT WE ARE LIVING OUR VALUES

LEADERSHIP COUNCIL – 20 APRIL 2016
The Audit: Core Findings/Potential Effects

Core Findings

- Dispositioning deficiencies
  - Candidates who aren’t minimally qualified (what this means and doesn’t mean)
  - Incomplete dispositioning of the applicant pool
- Training and documentation deficiencies
- Lack of internal compliance controls

Potential Effects

- Large fines and penalties
- Debarment from federal funding
- An OFCCP audit could be a long and costly process as auditors interview unsuccessful candidates and complainants
- UC Merced’s reputation in the local labor market
  - Living our values: poor hiring practices disproportionately impact women and underrepresented minorities.
  - Correcting past practices is more than regulation and compliance; it is an expression of our commitment to living our values and doing the right thing.
The Audit: Mitigation Strategies

- **HR Responsibilities**
  - Each recruitment effort will have an assigned recruiter to provide consultation and oversight of the recruitment effort
  - Intakes and Hiring Packets
  - Training for Hiring Department & for Search Committees
    - Note: Search Committees are NOT required
  - Dispositioning Services, if requested

- **Departmental Responsibilities**
  - Designate an Identified Hiring Authority (IHA)
    - Responsible and accountable party for compliance integrity
    - On-boarding responsibilities
    - Off-boarding responsibilities
Departmental responsibilities (continued)

Disposition certification
- The assigned HR recruiter must certify the dispositioning of the applicant pool
- Must occur prior to contacting anyone in the pool for interviews

Submission of all recruitment effort documents prior to offer (oral and/or written)
- Completed interview questions/notes/rating sheets
- Completed references
- Completed disposition in the applicant tracking system (PAWS)
- Background check questionnaire
- Finalist application packet – app, resume and cover letter
- Draft Offer Letter or Contract

(If applicable) Policy compliance:
- Near Relative Hire exception
- PPSM 30 Exception
- Rehire Retiree
The Audit: Mitigation Strategies

- Compliance responsibilities
  - EEOC and Affirmative Action Training Support
  - Ongoing audit to assess and ensure integrity of the recruitment process
- Effective Date: all recruitments opened on or after July 1, 2016
- Offers that are not properly approved by HR may be subject to deemed failure and may require a new search
- Each division will designate one or more people as their Identified Hiring Authority (IHA) to work with HR to ensure pool certification, completion of training as identified above, and pool disposition
- The IHA’s have individual accountability, and the recruiting departments will be held accountable for ensuring that each recruitment is in compliance with these hiring requirements
END: HIRING AUDIT CONSIDERATIONS

COMPelling needs to reduce UCM liability and exposure and to ensure that we are living our values

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