



HUMAN RESOURCES (HR) GRIEVANCES PROCESS AUDIT

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PREPARED AND SUBMITTED BY:



HR Grievances Process Audit

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INTRODUCTION

This report presents the findings, observations and recommendations based on BDO's internal audit of the HR Grievances process at Houston Independent School District (HISD) which was part of the 2022-23 board-approved audit plan. This audit was performed by BDO, LLP in Houston, Texas in accordance with the Standards for Consulting Services of the American Institute of Certified Public Accountants.

Background

Grievance is a formal process through which employees, parents, and the general public may seek resolution of their disputes or conflicts with HISD. Grievances and appeals must be filed with the appropriate campus administrator or Employee Relations Department using the grievance complaint form. Employee grievances must be filed within 30 days from when the incident took place; parental and public grievances must be filed within 15 days of the related incident. All unsatisfactory decisions for employee grievances must be appealed within seven (7) days of receipt of the decision; parental and public grievances are left open to appeal for ten (10) days after a response is issued.

OBJECTIVES

Our objective primarily focused on:

- Determining the effectiveness of processes in place around Grievances within HR Department to help increase employee experience.

PROCEDURES

To gain an understanding of the Grievance processes, we interviewed HR personnel and Compliance Coordinator, reviewed the applicable complaint files, and reviewed the Grievance policies and other applicable policies and regulations. Complaint files were reviewed to determine whether the grievances were handled appropriately and in compliance with the District's established policies and procedures. BDO examined the provided support to verify the appropriate documentation was retained and that case progressions occurred on a timely basis.

For the Grievances process, BDO selected 57 grievances that were issued during the audit period (May 2022 through May 2023) which consisted of 50 employee grievances, 5 parental grievances, and 2 public grievances. The following audit steps were performed:

- Verified Grievances were classified correctly as according to policy
- Verified Hearing Officers were assigned timely and appropriately
- Ensured the Hearing Officers received the appropriate, relevant documentation
- Ensured the timeliness of appeals and escalations for unsatisfactory Grievance responses
- Ensured Grievances were reviewed appropriately
- Verified Grievances met their respective deadlines
- Ensured decisions and closure letters were appropriately communicated to the requisite individuals
- Verified decisions were provided reasonably

OVERALL CONCLUSION

The audit found that HISD has a management framework in place to support the Grievance process. Policies and standard operating procedures exist to provide directions and ensure governance and compliance for the Grievance process.

However, the audit identified areas where work can be done to strengthen the overall administration of the process. We noted that the complaint forms were not stamped in all cases, conferences are not scheduled timely as according to the standard operating procedures and there were challenges in completing two grievances in a timely manner.

We also noted that there were improvement opportunities that would enhance the Grievances process, such as periodic reporting to the Superintendent on the overall status of the Grievances, updates to the standard operating procedures to align with the current practices and completing all sections of the complaint forms.

We had three reportable findings for this audit and three improvement opportunities. We define a finding as an internal control weakness or non-compliance with required policy, law or regulation and an improvement opportunity as an area where the internal control or process is effective as designed but can be enhanced.

This audit was conducted in accordance with Standards for Consulting Services of the American Institute of Certified Public Accountants. In accordance with our statement of work, we were not engaged to, and did not perform an audit of financial statements, the objective of which would be an expression of an opinion on the specific elements, accounts, or items. Accordingly, we do not express such an opinion. Also, we express no opinion on HISD's internal control systems over financial reporting or any part thereof. Had we performed additional procedures; other matters might have come to our attention that would have been reported to you.

Our report is written on an exception basis. We appreciate the opportunity to provide services to HISD and the cooperation and courtesy extended during our review by HISD personnel.

Very truly yours,

BDO USA, LLP

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FINDINGS

Complaint Forms Missing Date Received Stamp																													
1	<p>Finding: The Grievance Process Standard Operating Procedures dictates that Associate Professional Standards Analysts date stamp of all complaint forms received as well as retain hard copies. Of the 57 cases examined, BDO noted 42 complaint forms were not stamped with the date of receipt.</p> <p>Recommendation: BDO recommends following the Standard Operating Procedures and stamping date of receipt of on all complaint forms. Documentation of receipt would allow for a stronger remediation process and audit trail.</p>	<p>Management Comment:</p> <p>Analysts will date stamp all dispute resolution forms upon receipt, as outlined in the SOP.</p> <p>Owner: JaShonda Hamilton, Compliance Coordinator</p> <p>Date: January 31, 2024</p>																											
Conferences are not scheduled timely																													
2	<p>Finding: Per HISD’s SOP, assigned Hearing Officers will schedule a hearing within 7 calendar days of receipt of Level I and Level II cases. BDO noted 8 Level I employee grievance cases for which conferences were not scheduled timely.</p> <table border="1" style="width: 100%; border-collapse: collapse; margin: 10px 0;"> <thead> <tr> <th style="width: 5%;">#</th> <th style="width: 60%;">Type of Grievance</th> <th style="width: 35%;">Days Past Deadline</th> </tr> </thead> <tbody> <tr><td style="text-align: center;">1</td><td>Employee Level I</td><td style="text-align: center;">3</td></tr> <tr><td style="text-align: center;">2</td><td>Employee Level I</td><td style="text-align: center;">49</td></tr> <tr><td style="text-align: center;">3</td><td>Employee Level I</td><td style="text-align: center;">6</td></tr> <tr><td style="text-align: center;">4</td><td>Employee Level I</td><td style="text-align: center;">14</td></tr> <tr><td style="text-align: center;">5</td><td>Employee Level I</td><td style="text-align: center;">11</td></tr> <tr><td style="text-align: center;">6</td><td>Employee Level I</td><td style="text-align: center;">6</td></tr> <tr><td style="text-align: center;">7</td><td>Employee Level I</td><td style="text-align: center;">6</td></tr> <tr><td style="text-align: center;">8</td><td>Employee Level I</td><td style="text-align: center;">15</td></tr> </tbody> </table> <p>Recommendation: The District should monitor the cases to ensure compliance with the timelines and document the rationale for delay, whether due to the complainant, the District, or other external factors.</p>	#	Type of Grievance	Days Past Deadline	1	Employee Level I	3	2	Employee Level I	49	3	Employee Level I	6	4	Employee Level I	14	5	Employee Level I	11	6	Employee Level I	6	7	Employee Level I	6	8	Employee Level I	15	<p>Management Comment:</p> <p>Analysts will monitor cases to ensure that timelines are followed. However, due to circumstances beyond the analyst’s control, delays may occur and will be documented accordingly.</p> <p>Owner: JaShonda Hamilton, Compliance Coordinator</p> <p>Date: January 31, 2024</p>
#	Type of Grievance	Days Past Deadline																											
1	Employee Level I	3																											
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6	Employee Level I	6																											
7	Employee Level I	6																											
8	Employee Level I	15																											
Delays in Completion of Level III Grievances																													
3	<p>Finding: BDO noted two Level III employee grievances remained in pending status for over a period of one year. The respective grievance dates were 5/17/2022 and 7/5/2022.</p> <p>According to the SOP, Board Services will notify the employee of scheduled hearing date, however the time by when hearings should be completed was not documented.</p>	<p>Management Comment:</p> <p>Employee Relations and Board Services will work together to ensure Level III hearings are conducted in a timely manner.</p>																											

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	<p>Recommendation: The district should monitor cases to ensure Level III grievances are addressed timely.</p>	<p>Owner: JaShonda Hamilton, Compliance Coordinator</p> <p>Date: January 31, 2024</p>

IMPROVEMENT OPPORTUNITIES

<i>Overall reporting to the Superintendent</i>		
1	<p>BDO noted there are no formal procedures in place for providing summary analysis to the district’s Superintendents. The trends in grievance cases as well as any subsequent resolution should be analyzed and provided to Superintendents for a more efficient, effective district operation.</p> <p>Recommendation: The grievances filed throughout the school year should be summarily analyzed on a semi-annual basis. The findings should be provided to Superintendents for their consideration to preclude repeated occurrence of the same issues.</p>	<p>Management Comment: Grievance data will be shared with District leadership on a semi-annual basis.</p> <p>Owner: JaShonda Hamilton, Compliance Coordinator</p> <p>Date: January 31, 2024</p>
<i>Inconsistencies within the Standard Operating Procedures</i>		
2	<p>BDO noted inconsistencies within the Standard Operating Procedures in regard to:</p> <ul style="list-style-type: none"> • Aligning with the current title of the Professional Standards Analyst • Separation of the ‘Assigning a Level II Grievance’ section to include a separate section for ‘Conducting a Level II Hearing.’ Consistency across usage of sections in terms of each type of grievance. For example: Filing, Assignment, Conducting, Appealing. <p>Recommendation: BDO recommends reviewing and revising the SOP to align with current practices.</p>	<p>Management Comment: The SOP will be updated, as necessary, to reflect current titles and current practices.</p> <p>Owner: JaShonda Hamilton, Compliance Coordinator</p> <p>Date: January 31, 2024</p>

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<i>Complaint Forms can be updated to ensure relevant information is documented</i>		
3	<p>BDO noted 5 Level II cases in which Dispute Resolution Forms were not signed for by the grievant. When the grievant does not accept the Level I decision rendered, there is a section in the complaint form for signature of the grievant to refer the dispute to the next level.</p> <p>Recommendations: BDO recommends updating the complaint forms to include relevant sections and ensuring those are completed for all levels. There should be an effort to retain primary source documentation from the complainants evidencing their appeals.</p>	<p>Management Comment:</p> <p>The Dispute Resolution Form will be updated to be more user-friendly.</p> <p>Owner: JaShonda Hamilton, Compliance Coordinator</p> <p>Date: January 31, 2024</p>

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APPENDIX A - KEY POLICIES

- PERSONNEL-MANAGEMENT RELATIONS, EMPLOYEE COMPLAINTS/GRIEVANCES DGBA (LOCAL)
- PUBLIC COMPLAINTS GF (LOCAL)
- STUDENT RIGHTS AND RESPONSIBILITIES, STUDENT AND PARENT COMPLAINTS/GRIEVANCES FNG (LOCAL)