

**THE EDWARD J. COLLINS, JR.
CENTER FOR PUBLIC MANAGEMENT**

**MCCORMACK GRADUATE SCHOOL
OF POLICY AND GLOBAL STUDIES**

University of Massachusetts Boston

100 Morrissey Boulevard

Boston, MA 02125-3393

P: 617.287.4824

www.collinscenter.umb.edu

HUMAN RESOURCES REVIEW LANCASTER, MASSACHUSETTS

EDWARD J. COLLINS, JR. CENTER FOR PUBLIC MANAGEMENT

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INTRODUCTION

The Collins Center for Public Management was engaged by the Town of Lancaster as a result of receiving a Commonwealth Community Compact Grant, to conduct a Human Resources Review (Review). The Review was commissioned to document the current state of the human resources systems, staffing, policies and practices. The purpose of the Review is also to identify areas of deficit, policies to be adopted and provide recommendations for improvement.

METHODOLOGY

The methodology utilized was interviews with key personnel, including the Town Administrator, current and former members of the Board of Selectmen, the Executive Assistant to the Board of Selectmen, and various Department Heads. In addition to the interviews, an extensive review of Town documents and procedures was conducted.

DISCUSSION

The term “human resources” is broad and includes a host of functions. Human resource functions can be characterized as transactional or strategic. Human resources has evolved through the years from “personnel” administration to “human resources” management.

Personnel administration is the title formerly assigned to human resources duties. In the 1980s, personnel administration consisted of enrolling employees in benefit plans, processing and distributing paychecks, hiring, suspending and firing employees. The personnel department was merely an administrative function of the business. Concepts such as human capital or human resource management later emerged as HR began to play a bigger role in the strategic direction of the organization. Personnel administration matured into human resources, which evolved in two separate but connected ways -- strategic and transactional or functional HR.

Transactional human resources are the “traditional” functions of benefits administration, policy development and administration, position descriptions, payroll, worker’s compensation, personnel file maintenance, collective bargaining agreement administration, vacancy posting and collecting applications and resumes. According to SHRM, these “transactional” functions are a

way of “managing the employment relationship from recruitment and processing employees through retirement.”

On the other hand, strategic human resource functions deal with the strategic direction of the organization and include long term goals. According to SHRM “HR needs to be approached from a holistic point of view encompassing every function of human capital management” and that organizational leadership, should work towards “creating an effective human resources infrastructure that supports an employee-centric, service-oriented strategic human resources organization.” Strategic functions include long term planning, employee relations, training, succession planning, customer service and talent retention and development.

SUMMARY OF FINDINGS AND RECOMMENDATIONS

As communities and personnel issues have grown more complex, the responsibilities of town administration have also changed, expanded and placed more federal and state compliance demands on municipalities. As such, many municipalities have encountered difficulties in keeping up with the legal requirements of employment, benefit and labor laws which can be difficult particularly in the fast-changing human resources landscape.

RECOMMENDATIONS

The Collins Center primary recommendations are:

1. Centralize Human Resources
2. Centralize the recruiting function
3. Complete a file audit to ensure compliance
4. Create and implement a training plan
5. Consolidate Human Resources information on the Town webpage
6. Adopt a modification of Personnel Bylaws
7. Clarify and educate employees about the process of exiting employment
8. Standardize forms for employee leave

ORGANIZATIONAL STRUCTURE & RESPONSIBILITY FOR HUMAN RESOURCES FUNCTIONS

The Town of Lancaster's Town Administrator is the primary participant in human resources administration, with the Board of Selectmen, Executive Assistant, Treasurer/Collector, Finance Director/Accountant, and department heads also having responsibility for human resources.

Town Administrator

The Town Administrator serves as the Chief Procurement Officer, Personnel Director, and Chief Administrative Officer for the Board of Selectmen. As the agent of the Board of Selectmen, the Town Administrator is responsible for the efficient administration of all departments and employees under the jurisdiction of the Board of Selectmen, and coordinates with all departments, committees, commissions, and officials not under the jurisdiction of the Board of Selectmen. All of the Town's expenditures are authorized by the Town Administrator. The Town Administrator is responsible for recruitment, selection, collective bargaining, position descriptions and classification, policy development and administration, equal opportunity, workers compensation, and the coordination of human resources functions for the Town.

Executive Assistant to the Board of Selectmen and Town Administrator

The Executive Assistant coordinates and assists the Town Administrator with human resources work, such as file management.

Treasurer/Collector & Finance Director

The Treasurer/Collector and Finance offices are responsible for onboarding new employees for matters of payroll administration and health benefit enrollment and administration. The Finance Director verifies the payroll entered by the Treasurer/Collector's office, and receives some employee relations issues.

Department Heads

Department heads review applications, interview candidates and make recommendations for appointment. Department heads are responsible for onboarding new employees, employee management, submitting payroll and approving leave.

COMPLIANCE ASSESSMENT

The Collins Center conducted an extensive review of Lancaster's procedures for all aspects of human resources, with particular attention being paid to issues surrounding compliance with state and federal laws. Improvements should be made to improve efficiencies. The following is a summary of findings and recommendations.

Recruitment

Vacant positions are posted on the Town website, Massachusetts Municipal Association's website, in the newspaper, and on other professional sites. Positions are posted for 10 days.

Employment Applications

The Town has a standard employment application used by all applicants for all positions. A standard employment application is important as it allows targeted, consistent and controlled information collection and an ability to provide information to the candidate, such as the Town's equal opportunity hiring statement. The current application includes applicant affirmation that the information provided is accurate. General recommendations for employment applications, are as follows:

1. The Town should enable the application to be fillable online (while still preserving a candidate's option to print out the application). The Town should consider an electronic signature option so candidates can also submit the application without having to print it out.
2. The application should contain updated contact information, including both email and phone numbers, for a contact person in case the candidate has any questions.
3. Applications should not request a Social Security number due to identity theft and privacy concerns. The Town should not need this information until it is time to run a background check or complete a W-4 and including it on an application carries unnecessary risk.
4. Applications should not request a date of birth as it can reveal an applicant's age and lead to allegations of age discrimination.

5. The application should contain an anti-discrimination statement similar to the following:
“The Town of Lancaster is proud to be an equal opportunity employer. Therefore, qualified applicants will be considered regardless of their sex, race, age, religion, color, national origin, ancestry, physical or mental disability, genetic information, marital status, sexual orientation, gender identity, gender expression, military and veteran status, or other status prohibited by law.”
6. The application should not contain any questions regarding an applicant’s work authorization status. Instead, the application should contain the following statement: "In compliance with federal law, all persons hired will be required to verify identity and eligibility to work in the United States and to complete the required employment eligibility verification form upon hire."
7. To obtain information on whether an applicant holds a degree or a diploma, the Town can simply ask if the applicant has graduated and what degree was obtained. The application should not ask for an applicant’s graduation dates since that information can reveal an applicant’s age (and lead to allegations of age discrimination).
8. Similarly, the Town should not ask for an applicant’s dates of employment at previous jobs. Instead, the Town can ask how many years the applicant was employed.

Screening and Interviewing

An important function of any employer is to ensure hiring practices are standardized and compliant with federal and state laws. It is critical for an employer to have consistent employment practices, ensure all interview questions are legal, and job related, and document all selection processes. The Collins Center recommends centralization of the Human Resource function to accomplish this and involving the Town Administrator in the hiring process for each department.

Department heads are currently screening applications they receive, and conducting interviews based on their own questions. A standard set of interview questions should be created, and asked of each candidate. These will be filed in the Town Administrator’s office with other recruiting files. A training on appropriate interviewing is also recommended for department heads.

It is recommended all applications for employment come through the Board of Selectmen's office, which will then provide a copy of the applications to the department head. The department head can screen the applications and decide which candidates to interview. Candidates that are not interviewed should receive a standard notification that they will not be moving forward in the interview process. Communication of "non-interest" should be sent to those who do not fill the open position at the end of the process, as well.

All interview notes, applications, and collected applicant data should be filed together in a designated recruitment filing area.

Criminal Offender Records Information (CORI) Checks and I-9 Verification

CORI checks are completed by Montachusett Area Regional Transit (MART) and the Police Department after a conditional offer of employment has been accepted by an applicant. All CORI checks should be completed by MART. It is recommended that the Town adopt a CORI policy, including what to do if a candidate does not pass the CORI. CORI records should not be stored in employee personnel files. An internal file audit should be completed to ensure all CORI records are kept separately from personnel files. CORI records may not be retained longer than three years after an employee separation.

The Town does not have a formal process for obtaining and maintaining I-9 forms and records. It is recommended the Town create a procedure to ensure compliance. An employee must provide I-9 information to prove eligibility for work and should not be allowed to work without the appropriate documentation in hand. I-9 forms must not be stored in employee personnel files. It is recommended that the Town complete an internal file audit, and ensure all I-9s are stored in separate locked file storage.

References

References are conducted by the department head seeking to fill a position. The Town should adopt a policy regarding references and how to document them. It is best to have one person conduct references, or have one person manage the reference process and receive notification

from Department Heads when references are completed. References on potential candidates should be documented on a standard reference form and maintained in the position recruitment file.

Conditional Offer Letters of Employment and Appointment Letters

Currently, the Town sends a conditional offer letter to prospective employees. Offer letters are important to inform candidates of the probationary period, the need for pre-employment physicals and background checks, as well as puts the employee on notice regarding licenses they are required to have prior to employment and those they are expected to obtain within a reasonable amount of time after beginning their employment. Rejection letters are not currently sent out.

The Collins Center recommends that the process of sending out rejection letters and offer letters be centralized in the Town Administrator's Office, including for police and fire.

Applications and records for all job candidates must be kept in accordance with the Municipal Retention Guidelines. In keeping with the move towards centralizing the human resource functions, these applications and records should be kept by the Town Administrator for all departments, including Police and Fire.

Pre-Employment Physicals and Drug Testing

The Town currently requires all selected candidates to pass a pre-employment physical and drug screen as a condition of employment. The drug screen and physical exam are scheduled by the Town Administrator's office, which receives the results and notifies the candidate. The Town has a written policy regarding pre-employment physicals.

New Hire Procedures

Information on newly hired employees is not always forwarded to the Treasurer/Collector and Finance Director prior to an employee's first day of employment. New employee information

should be received by the Treasurer/Collector and Finance Director prior to an employee's first day of employment so that onboarding procedures can be planned out. It is critical that the proper employment paperwork be received and recorded on or before the first day of employment. The Treasurer/Collector assists new employees with the completion of employee paperwork. Having a centralized hiring process will ensure tracking of open positions. It is recommended that an employee change form be created and utilized. It will ensure no steps are missed during the hiring process, that the process itself is streamlined and ensure the Treasurer/Collector is notified of any hires (and terminations) in a timely fashion.

Orientation and Onboarding

The Town has a new hire checklist used by the Treasurer/Collector when employees are onboarded. However, there is not a formal onboarding process for new employees. It is recommended that a more robust onboarding be implemented for new employees. Providing new employees with a list outlining any policies they sign off on, meet and greets, a basic technology training, and other customizations you feel are necessary, will make them feel more informed and empowered to succeed in their new roles. Department heads are responsible for job related training

Central Personnel File Retention

According to MGL Chapter 149, Section 52C, the Massachusetts Personnel Records Law, employee personnel files must include all documents kept by an employer which have been used for or may affect that employee's qualifications for employment, promotion, transfer, additional compensation or disciplinary action. This includes, at a minimum, the following information:

- name
- address
- date of birth
- job title
- job description
- rate of pay
- any other compensation paid to the employee
- starting date of employment
- completed application
- resume or submitted employment inquiry
- all employee performance evaluations, including but not limited to, employee evaluation documents, written warnings of substandard performance, lists of probationary periods

- waivers signed by the employee
- documents relating to disciplinary action regarding the employee
- copies of dated termination notices

The duties of managing employee files falls under the management of the Personnel Board per Town bylaws. The Personnel Board has not met since FY2009. The Town Administrator's office retains the official personnel files for employees. The Collins Center recommends the Town Administrator coordinate with department heads to review any employee "follow files" kept by departments to ensure the official file maintained at the Board of Selectmen's Office contains copies of all records kept in individual department files.

Benefits

Lancaster offers a well-rounded benefits package including health insurance, dental insurance, life and dependent life insurance, disability insurance, and retirement. The Treasurer/Collector's office is responsible for health enrollment and coordination for employees and retirees.

Payroll

The payroll systems in Lancaster are sufficient and functional for the workforce. Payroll is processed weekly. Employees submit timesheets to the department head. Employee timesheets are verified by the department head, added to a cover sheet, and then submitted to the Treasurer/Collector. The Payroll Clerk cross checks the data and inputs hours for each employee. Once the payroll is submitted, payroll is processed by E-Pay. Direct deposit is required.

Technology and Webpage

The town website has limited human resources related information for employees and prospective employees to reference. The information is disjointed, and it is recommended that it be housed together on one "department" page to be more user friendly and easier to reference.

The Collins Center recommends the following:

1. The "Employee Information" tab should be renamed to "Human Resources", and the sub

categories on the page should be clearly titled. Employees know exactly what to expect when they click on “Wellness Flyers”, for example. “Employee Links of Interest” appears to only include retirement information, and should therefore be named as such.

2. The Town’s Equal Opportunity and Affirmative Action Policy should be added to the website.
3. The Town’s employment application is currently on the website. If possible, the application should be converted to a “fillable online” form and be able to allow online submission.
4. Job descriptions should be added to the website for employees, managers, and boards to reference.
5. A link to the job description can be added to postings for vacant positions for easy access for applicants.
6. Information about the Town’s Employee Assistance Program should also be added to the web page to provide easier, confidential access to information.
7. Policies and/or personnel by-laws should be linked to the Human Resources page for employees to reference as needed.
8. Contact information for both benefits related questions and employee relations issues should be added to the website.
9. Much like payroll forms, forms for leaves of absence should be added to the website, and made into a fillable form if possible.

Leave Administration

The Town does not have a formal leave administration process or policies. While the Town’s payroll process of timesheets records leave taken and is entered into the payroll system, no person or office has the responsibility for leave administration. Department heads and/or the Town Administrator approves leave and the balances are reconciled with the Treasurer/Collector’s office as part of the payroll process. A centralized system of managing leave should be the responsibility of the Town Administrator’s office so compliance with collective bargaining agreements, and federal and state laws can be followed.

Training

Massachusetts requires municipalities to annually distribute its sexual harassment policy to each employee and also encourages employers to regularly conduct education and training programs on sexual harassment for all employees. The Town should ensure employees are provided with its sexual harassment policy annually and that every employee acknowledges receipt. Without the annual distribution of policies and training on discrimination issues in the workplace, the Town and its officials are exposing themselves to potential liability.

It is recommended the Board of Selectmen's Office conduct a training needs assessment and develop a short- and long-range plan to address identified needs. In addition to regular training on Conflict of Interest, Sexual Harassment and Public Records, the Collins Center recommends that employers conduct additional training for supervisory and managerial employees, which should address their specific responsibilities. It is critical department heads, managers and supervisors receive training regarding discrimination (including the ADA and "reasonable accommodations", harassment, performance management and progressive discipline, the Family and Medical Leave Act, and "best practice" interview questions (i.e., what not to ask).

Performance Evaluations

Lancaster conducted performance evaluations for Town employees in the past, but has moved away from this practice. Performance evaluations can be an effective tool for both employees and supervisors, if the process is designed correctly. Conducting meaningful performance evaluations can be challenging particularly in situations like in Lancaster, where many departments are staffed with a single employee reporting to a Board. While appointed or elected boards have responsibility, members are not involved in the day to day occurrences and see employees completing daily tasks or observing customer service. Having several evaluators undermines the uniform application of the evaluation process. Without training and agreed upon standards a performance evaluation system should not be implemented. If the Town chooses to reestablish a performance appraisal system it is recommended it be done for department heads, all being evaluated by the Town Administrator with input from the boards. Doing so, will further

centralize human resource functions and ensure a uniform approach to evaluation. Performance evaluations are a tool for communication. The Town may choose to adopt a policy that links performance evaluations to compensation. However, unless or until all evaluations are done uniformly with the same evaluator and standards, it is not recommended.

Labor Relations and Collective Bargaining

Lancaster has four different unions including Clerical, Police, Fire, and the Department of Public Works. The Town Administrator's office is responsible for the negotiation of the collective bargaining agreement and its administration.

Post-Employment

The Town does not have a consistent process for employee transitions. It is recommended the Town create a termination and post-employment check list that would include items such as vacation payments, unemployment notices, insurance continuation and retirement. The form could be added to the "retirement" section of the website. A standard exit interview should be conducted.

PERSONNEL BYLAW REVIEW

Like many communities, Lancaster has bylaws and ordinances related to personnel administration in accordance with the provision of Massachusetts General Law, Chapter 41. The Personnel Bylaws provide for a three-member Personnel Board, appointed by the Board of Selectmen. Per the Town bylaws, the Personnel Board administers the personnel bylaw, classification plan, compensation plan, and establishes procedures it deems necessary. The Board is responsible for establishing and maintaining personnel records. It has the authority to review the work of all positions and make changes to those positions. The changes include employee classifications and wages. It is important to note that this information is still current in the bylaws.

The Board has not met since FY2009, meaning the Board is not completing its duties or managing the personnel matters above. It is recommended that the Personnel Board be formally dissolved.

As communities and personnel issues have grown more complex, the responsibilities of town administration have also changed, increased, and placed more compliance demands on communities. As such, many communities have encountered difficulties in keeping up with the legal requirements of employment, benefit and labor laws while adhering to personnel bylaws, which can be cumbersome, particularly in the fast-changing human resources landscape. Employment laws, state and federal mandates, and the changing workforce have required communities to be more flexible and able to make policy changes in an efficient manner. Because of this reality and practicality, we recommend the Town significantly modify its personnel bylaws.

The bylaws should have a basic statement of purpose, equal opportunity and identify the Town Administrator as the Personnel Administrator and authorizing the establishment of a Personnel Policy Plan that will be administrated by the Town Administrator and approved by the Board of Selectmen. Such a plan could contain almost all the provisions of the existing personnel bylaws and could easily be updated as needed. A separate attachment containing draft policies will be provided for your review.

The Town should work with Town Counsel on the logistics of switching from a bylaw to a personnel policy plan. The table below notes where changes can be made while converting bylaws to policies.

Current Personnel Bylaws		Notes
General Provisions	Equal employment opportunity policy; lie detector tests	Equal Employment Opportunity, Anti-Discrimination and Harassment - see Collins Center Policy
General Provisions	Authorization; amendment	Amend
General Provisions	Personnel Board	Remove
General Provisions	Applicability	Keep
General Provisions	Definitions	Keep
Classification Plan	Mandatory classification	Keep

Current Personnel Bylaws		Notes
Classification Plan	Employee categories	Keep
Classification Plan	Allocation and new positions	Keep
Classification Plan	Hiring and reclassification	Recruitment and Selection - see Collins Center Policy
Classification Plan	Probationary period	Keep
Classification Plan	Job descriptions and interpretations	Amend
Classification Plan	Class title	Keep
Classification Plan	Work week	Amend - see Collins Center Policy on Hours of Work & Overtime
Classification Plan	Confidential information	Keep
Classification Plan	Dress code policy	Dress Code - see Collins Center Policy
Compensation Plan	Appropriated funds	Keep
Compensation Plan	Pay and salary schedule	Keep
Compensation Plan	Pay rate and benefits for new personnel	Amend
Compensation Plan	Promotions and transfers of employees	Amend
Compensation Plan	Personal rates above maximum	Keep
Compensation Plan	Working from home	Amend/Combine - see Collins Center Policy for Emergency Remote Work
Compensation Plan	Straight-time hourly pay	Keep
Compensation Plan	Overtime	Keep
Compensation Plan	Other special pay	Keep
Compensation Plan	Performance review; raises	Amend - see Collins Center Policy
Disciplinary Action	Disciplinary procedure	Keep
Disciplinary Action	Termination for cause	Keep
Grievances and Appeals	Step 1	Amend and combine, see Collins Center Policy "Grievance Procedure"
Grievances and Appeals	Step 2	
Reduction in Force	Considerations	Keep
Reduction in Force	Reemployment	Keep
Reduction in Force	Employees with identical employment dates	Keep
Benefits	Form of indirect pay	

Current Personnel Bylaws		Notes
Benefits	Applicability of benefits	Amend and combine, see Collins Center Policy "Health Insurance Portability & Accountability Act" & "Insurance Benefits"
Benefits	Compensated absence	Amend: holiday/vacation/sick/bereavement/jury duty/military/other leave - split up into individual policies and add Domestic Violence Leave - see Collins Center policies on leaves
Benefits	Noncompensated absence	Amend: disability/parental/leave of absence - split up - see Collins Center policies on leaves
Benefits	Unauthorized leave of absence	Amend
Benefits	Educational assistance	Amend
Benefits	Mileage reimbursement	Amend - see Collins Center Policy on Vehicle Use and Reimbursement
Benefits	Insurance coverage	Keep
Benefits	Retirement benefits	Amend - See Collins Center Policy on Retiree Health Insurance
Benefits	Civil service law	Keep
Benefits	Severability	Keep
Sexual Harassment Policy	Purpose	Amend and combine, see Collins Center Policy for Anti-Discrimination
Sexual Harassment Policy	Definitions; retaliation for complaints	
Sexual Harassment Policy	Filing of complaints	
Sexual Harassment Policy	Private counseling option	
Sexual Harassment Policy	Investigation of complaints	
Sexual Harassment Policy	Disciplinary action	
Sexual Harassment Policy	State and federal remedies	
Policies to Add	Anti-Fraud	Add
Policies to Add	Conduct and Discipline	Add
Policies to Add	Conflict of Interest	Add

Current Personnel Bylaws		Notes
Policies to Add	Consolidated Omnibus Budget Reconciliation Act (COBRA)	Add
Policies to Add	Criminal & Sexual Offender Records Information	Add
Policies to Add	Drug & Alcohol Free Workplace	Add
Policies to Add	Performance Evaluations	Add
Policies to Add	Personnel Records	Add
Policies to Add	Political Activity	Add
Policies to Add	References	Add
Policies to Add	Small Necessities Leave Act	Add
Policies to Add	Social Media	Add
Policies to Add	Whistleblower Protection	Add
Policies to Add	Workers Compensation	Add
Policies to Add	Workplace Safety	Add
Policies to Add	Workplace Violence Protection	Add

FINDINGS AND RECOMMENDATIONS

Finding 1: Centralize the Human Resources function

Centralizing the human resource functions will result in increased professional level human resource services. The Town Administrator's office has the responsibility for primary human resource functions, such as hiring, policy maintenance and distribution, records maintenance, and training coordination. Currently, employees do not have a clear avenue to address human resources concerns, and it can be confusing and sets the stage for different interpretations of policies and procedures. It will also ensure clear and consistent processes.

Recommendation 1.1: It is recommended the Town identify and communicate a contact and secondary contact for employment issues who will serve as a valuable resource for employees. At times, the Town Administrator cannot be available to hear an employee relations concern or field a human resource related question, and a different person needs to be available. This could be the Executive Assistant to the Town Administrator and Board of Selectmen.

Finding 2: Centralize the Recruitment function

Individual department heads manage talent acquisition in their own way and there is not a formal process that dictates a time table, or ensures steps are followed. Managers conduct their own interviews and reference checks. Many managers do not have the tools or training to ensure standard and compliant interview questions. By centralizing the recruitment process, department heads will be sure to manage their interviews appropriately and file necessary documents accordingly.

Recommendation 2.1: Having a centralized and uniform selection process will ensure tracking of open positions. It is recommended that an onboarding form be created and utilized. It will ensure steps are not missed during the hiring process, that the process itself stays consistent and streamlined, and ensure the Treasurer/Collector is notified of any hires in a timely fashion.

Recommendation 2.2: It is recommended that all applications be sent to the Town Administrator. The Town Administrator will distribute a copy of all applications to the appropriate department head for their review. The Town Administrator will be notified when a candidate is selected, and ensure the proper paperwork is completed, pre-employment checks are done, and new hire paperwork is initiated through the Finance Director and Treasurer/Collector and tracked on a form, as recommended above.

Recommendation 2.3: It is recommended all department heads attend a training on interviewing. This will help empower managers, and ensure the interview questions asked are consistent and appropriate.

Recommendation 2.4: It is recommended the Town adopt a policy regarding references, and train managers on how to document them. A standardized form should be used to document references and be maintained in the selection process folder.

Recommendation 2.5: It is recommended that the process of sending out rejection letters and offer letters be centralized in the Town Administrator's Office, including police and fire in order to maintain proper documentation and consistency in process.

Finding 3: Complete a File Audit to Ensure Compliance

The Town Administrator's office houses employee files. CORI records, I-9 Forms, and any medical forms should be filed outside of main personnel files. It is a liability to have these documents in the main employee files.

Recommendation 3.1: It is recommended that the Town complete a self-audit of employee files and ensure I-9 documents are kept separately from the main employee files.

Recommendation 3.2: It is recommended the Town create a procedure to ensure compliance with I-9 regulations which includes requiring I-9 documentation before an employee begins work and maintaining records in a folder separate from the personnel folder.

Recommendation 3.3: It is recommended that the Town complete a self-audit of employee files and ensure CORI documents are kept separately from the main employee files. CORI documents should not be kept longer than 3 years.

Recommendation 3.4: It is recommended that the Town complete a self-audit of employee files and ensure all medical documents are kept separately from the main employee files.

Recommendation 3.5: It is recommended that the Town Administrator coordinate with department heads to review any employee "follow files" to ensure the official file maintained at the Board of Selectmen's Office contains copies of all records kept in individual department files.

Finding 4: Create and implement a training plan

The Town has an opportunity to better plan for an increased amount of training.

Recommendation 4.1: It is recommended that the Town conduct a training needs assessment, and develop a short- and long-term plan to address identified needs.

Recommendation 4.2: It is recommended that the Town create a training calendar to ensure annual trainings, such as harassment and anti-discrimination, are completed as required.

Recommendation 4.3: It is recommended that the Town conduct additional training for supervisory and managerial employees, which should address their specific responsibilities. It is critical department heads, managers and supervisors receive training regarding discrimination (including the ADA and “reasonable accommodations”, harassment, performance management and progressive discipline, the Family and Medical Leave Act, and “best practice” interview questions (i.e., what not to ask). Addressing these topics will help reduce liability.

Finding 5: Consolidate Human Resources information on the Town webpage

The Town’s website houses some Human Resources related information, but it is disjointed.

Recommendation 5.1: It is recommended that human resources information be housed together on one “department” page to be more comprehensive and easier to reference.

The Collins Center recommends the following:

- The “Employee Information” tab should be renamed to “Human Resources”, and the sub categories on the page should be clearly titled. Employees know exactly what to expect when they click on “Wellness Flyers”, for example. “Employee Links of Interest” appears to only include retirement information, and should therefore be named as such.
- The Town’s Equal Opportunity and Affirmative Action Policy should be added to the website.
- The Town’s employment application is currently on the website. If possible, the application should be converted to a “fillable online” form and be able to allow online submission.
- Job descriptions should be added to the website for employees, managers, and boards to reference.
- A link to the job description can be added to postings for vacant positions for easy access for applicants.

- Information about the Town's Employee Assistance Program should also be added to the web page to provide easier, confidential access to information.
- Policies and/or personnel by-laws should be linked to the Human Resources page for employees to reference as needed.
- Contact information for both benefits related questions and employee relations issues should be added to the website.
- Much like payroll forms, forms for leaves of absence should be added to the website, and made into a fillable form if possible.

Finding 6. Adopt a modification of Personnel Bylaws

Recommendation 6.1: It is recommended that the Personnel Board be formally dissolved. The Personnel Board has not met since FY2009. The Town has moved the duties of the Personnel Board onto the Board of Selectmen/Town Administrator. Because of this reality and practicality, we recommend the Town significantly modify its personnel bylaws. More and more municipalities are voting to remove Personnel Boards from their Human Resources management organization, and put HR duties in the hands of the Board of Selectmen, Town Administrator, and/or Human Resources Administrator.

Recommendation 6.2: It is recommended that the Town utilize personnel policies. Human resources has an ever changing landscape. Having human resources as a part of Town bylaws makes it increasingly challenging to keep up to date with legislation and liability. Having the human resources duties be a part of the personnel officer's day to day responsibilities brings a level of professionalism and attention to human resources. The Town should work with Town Counsel on the logistics of switching from a bylaw to a personnel policy plan.

Finding 7: Clarify and educate employees about the process of exiting employment.

Recommendation 7.1: It is recommended the Town create a termination and post-employment check list that would include items such as vacation payments, unemployment notices, insurance continuation and retirement.

Finding 8: Standardize forms for employee leave

Recommendation 8.1: It is recommended that the Town standardize leave request forms.

Having a standard leave request form will make tracking employee leaves, including vacation, sick, and FMLA easier.

CLOSING

Thank you for inviting the Collins Center for Public Management into your community. The Collins Center anticipates that the findings, observations and recommendations contained in this Report will help the Town of Lancaster on its path of creating a modern, legally compliant and professional human resources system, thus limiting liability.

We appreciate all the time given by the people interviewed during this process. We would be remiss if we did not acknowledge the assistance received from Executive Assistant, Kathi Rocco, who was extremely gracious with her time and support. Please do not hesitate to contact us for clarification or discussion of this report.