



WORDS ON WISE MANAGEMENT

Spring cleaning in the HR department

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The groundhog may have predicted a longer winter, but spring will be here before we know it. It's a good time of year to focus on spring cleaning in the HR department. Over time, policies, processes, and daily routines get "dusty" as regulations change, staff turns over, and technology is updated. Here are some areas to start cleaning up.

Grab your dust cloth

Employee handbook. A handbook serves two primary purposes: (1) setting forth policies that comply with applicable laws and (2) providing a useful reference for employees to learn about policies and expectations that affect them. Handbooks become dated very quickly—for example, when regulations governing the Family and Medical Leave Act (FMLA) change or common behaviors change. Clean up stilted legalese in your handbook, and make sure your policies are expressed clearly. Update any obsolete terminology and outdated examples as needed.

Form I-9. Enforcement of I-9 requirements has become much more stringent. In the past, errors found during audits could be corrected within a 10-day period without the company incurring a penalty. Now, even small correctable errors can be subject to penalty. If you have never conducted a complete audit, start there.

Keep a copy of the U.S. Citizenship and Immigration Services' (USCIS) "Handbook for Employers" on hand. Maintain your I-9 forms regularly, keeping active documents for employees separate from documents for former employees, and set up a procedure for retention control.

Employee HR files. Set a goal to reduce the number and types of paper files you maintain, and go paperless whenever possible. Review your processes for retention and protection of confidential information as well as rules on disclosure. Determine who may access specific information on a need-to-know basis. Ensure that original or equivalent documents containing payroll-related information are present and correctly retained, along with benefits-related information.

Information that should be closely protected and disclosed only for valid reasons includes:

- (1) Any relevant legal documents such as wage garnishments or child support deductions;
- (2) Payroll-related information, including state and federal tax forms, payroll change forms, approved deduction documentation, and paid time off information;
- (3) Benefits-related information; and
- (4) Medical information, including return-to-work notifications, FMLA certification forms, and workers' compensation paperwork.

There should be no separate "departmental" personnel files maintained outside HR. Allow employees to review the information in their personnel files and request that any discrepancies be corrected.

HR compliance posters. Posters do matter, and U.S. Department of Labor (DOL) investigators will check for them. Required posters should be easily visible to employees and hung on a surface that isn't used for other purposes. Don't forget the additional state requirements, including posters on workers' comp and child labor.

Federal forms. Ensure that you have the latest versions of forms required for FMLA requests, FMLA medical certifications, COBRA notices, and Health Insurance Portability and Accountability Act (HIPAA) authorizations.

Service providers. You can also review the services you receive from your insurance providers, COBRA administrators, and workers' comp carriers. Make sure all required documents are current (e.g., business associate agreements, notices of privacy practices). Review the procedure for ensuring that employees receive the COBRA initial notice as well as the procedure for communicating with the administrator to ensure timely processing of COBRA notices and elections. Review insurance listings to make sure that all former employees are off the rolls and the correct premiums are being paid for each employee.

Fresh start

Make the effort to "spring clean" your policies and procedures. It will save you time in the long run and improve your department's effectiveness.



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