



# Oregon

Tina Kotek, Governor

Department of Administrative Services

Chief Human Resources Office

155 Cottage Street NE

Salem, OR 97301

FAX: 503-378-6879

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To: Statewide Agency HR Leaders  
Subject: 2025 Human Resources Compliance Action Plan

## 2025 HR COMPLIANCE ACTION PLAN

The Human Resources Compliance Program conducts administrative reviews to assess agency adherence to human resources laws, rules, and policies. Additionally, the program engages in research and analysis to promote effective human resource management practices.

The mission of the Human Resources Compliance Program is to empower state agencies by engaging in proactive reviews, fostering collaborative solutions, and offering educational support to enhance compliance throughout the enterprise.

The Human Resources Compliance Action Plan is designed to ensure that the Chief of Human Resources Office (CHRO) within the Oregon Department of Administrative Services (DAS) effectively assists the Executive Branch of the Oregon state government in following state and federal human resources laws, regulations, and policies.

This plan outlines the mechanisms and strategies for conducting high-level reviews, evaluating agency practices, and implementing corrective actions as necessary to ensure that human resource practices meet compliance standards within the Oregon state government.

## ASSESSMENT DETAILS

### ADA AND REASONABLE ACCOMMODATION IN EMPLOYMENT

#### Purpose of the Review

This human resources compliance review will assess how well Oregon state agencies adhere to:

*Mission: Lead state agencies through collaboration in service of Oregonians.*

- The state HR Policy: [ADA and Reasonable Accommodation in Employment](#) (50.020.10)
- The Americans with Disabilities Act (ADA)

The focus is on ensuring that:

- Employees and job applicants with disabilities receive appropriate and timely accommodations.
- Individuals with disabilities have access to work and opportunities.

The review aims to:

- Identify strengths and areas for improvement in compliance processes.

## **Key Areas of Assessment**

The review will assess several critical areas, including:

- **Accommodation Request Process**
  - How requests are received and processed.
  - Timeliness and adequacy of agency responses.
  - Quality of engagement with employees during the interactive process.
- **Documentation and Record-Keeping**
  - Agency documentation practices.
  - Record-keeping standards and compliance.
- **Training and Awareness Programs**
  - Programs provided to staff on ADA compliance.
  - Effectiveness of training initiatives.

## **Evaluation Standards**

Evaluations will be measured against:

- State HR Policy: [ADA and Reasonable Accommodation in Employment](#)
- Federal ADA standards

## **Timeline and Reporting**

Review Period

- February 2025 – April 2025

Findings and Recommendations:

- A comprehensive report will be shared with state agencies.
- It will highlight both effective practices and areas needing improvement.

## Objective

The review seeks to:

- Advance equity and accessibility within Oregon's state government workforce.
  - Create a more inclusive workplace for individuals with disabilities.
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## SPECIAL MERIT INCREASE

### Purpose of the Review

This human resources compliance review will assess how well Oregon state agencies adhere to:

- The state HR policy: [Merit Pay System](#) (20.005.05).
- ORS 240.235

The focus is on ensuring that:

- Special Merit Increases are administered consistently and fairly.
- Agencies comply with reporting and justification requirements.

The review aims to:

- Identify strengths and areas for improvement in compliance processes.

### Key Areas of Assessment

The review will assess several critical areas, including:

- **Administration of Special Merit Increases**
  - How increases are awarded and justified.
  - Consistency and fairness in application.
  - Identification of potential risks and challenges.
- **Compliance and Reporting**
  - Adherence to the requirement to report increases to the CHRO.
  - Evaluation of whether justifications meet established standards.
- **Collaboration and Engagement**
  - Engagement with agency HR leaders and the CHRO.
  - Ensuring mutual understanding of expectations and challenges.

### Evaluation Standards

Evaluations will be measured against:

- State HR Policy: Merit Pay System (20.005.05)

- ORS 240.235

## Timeline and Reporting

Review Period:

- May 2025 – July 2025

Findings and Recommendations:

- A detailed report will be shared with state agencies.
- The report will help strengthen compliance efforts.
- It will highlight both effective practices and areas needing improvement.

## Objective

The review seeks to:

- Advance transparency, compliance, and fairness in special merit increases.
- Ensure a robust and equitable framework that supports agency and employee success.

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# EXCEPTIONAL PERFORMANCE RECOGNITION LEAVE WITH PAY

## Purpose of the Review

This human resources compliance review will assess how well Oregon state agencies adhere to:

- The state HR policy on exceptional performance recognition leave with pay under [Special Leaves with Pay](#) (60.000.10).

The focus is on ensuring that:

- Employee eligibility requirements are met.
- Awards are based on documented exceptional performance.
- Agencies comply with policy restrictions on leave administration.

The review aims to:

- Identify strengths and areas for improvement in compliance processes.

## Key Areas of Assessment

The review will assess several critical areas, including:

- **Eligibility and Award Criteria**
  - Verification that employees meet the six (6) month state service requirement.
  - Ensuring awards are based on documented exceptional performance.
  - Adherence to the limit of forty (40) hours per fiscal year.
  
- **Consistency and Documentation**
  - Application of consistent standards for determining exceptional performance.
  - Review of documentation to ensure alignment with agency goals and policies.
  
- **Approval Process for Agency Heads and Board Members**
  - Submission of supporting rationales.
  - Approvals by the Department of Administrative Services (DAS) Director.

## Evaluation Standards

Evaluations will be measured against:

- The state HR policy on exceptional performance recognition leave with pay under [Special Leaves with Pay](#) (60.000.10).

## Timeline and Reporting

Review Period:

- August 2025 – October 2025

Findings and Recommendations:

- A detailed report will be shared with state agencies.
- The report will help strengthen compliance efforts.
- It will highlight both effective practices and areas needing improvement.
- Follow-up reviews will assess progress and provide additional support as needed.

## Objective

The review seeks to:

- Enhance consistency and transparency in the administration of this leave.
  - Ensure compliance with restrictions and alignment of awards with performance criteria.
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# YEAR-ROUND COMPLIANCE MONITORING

## Span of Control

- Pursuant to the [Span of Control](#) (30.000.20) policy, ORS 291.204, ORS 291.227
- Frequency: Quarterly report
- The CHRO publishes quarterly Span of Control reports and collaborates closely with agencies that exceed the established maximum supervisory ratio to ensure compliance. This process is supported by Span of Control Policy 30.000.20 and aligns with statutory requirements outlined in ORS 291.204 and ORS 291.227.

## Temporary Appointments

- Pursuant to the [Temporary Appointments](#) (40.025.01) policy, ORS 240.309
- Frequency: Quarterly report
- The CHRO releases quarterly Temporary Appointment reports and works closely with agencies employing temporary employees who exceed the 1,040-hour limit within a temporary year, as defined by ORS 240.309.

## Patient Protection and Affordable Care Act (ACA)

- Pursuant to the [Patient Protection and Affordable Care Act](#) (50.070.01) policy, 26 U.S. Code § 4980H  
Frequency: Every four months
- Beginning in 2025, the CHRO will generate reports every four (4) months to assess the enterprise's effectiveness in determining, providing, and documenting offers of coverage to eligible temporary employees through Workday, ensuring that the documentation process and benefits offering comply with the Patient Protection and Affordable Care Act (ACA) Policy 50.070.01.
- The report will be reviewed whether the Offer of Coverage has been uploaded and completed accurately in Workday.

## Military Leave

- Pursuant to the [Military Leave](#) (60.000.25) policy, ORS 408.290
- Frequency: Monthly
- Beginning in 2025, the CHRO will run reports from Workday to identify employees who exceed the allotted military leave with pay of up to 21 workdays in one (1) training year, as specified in ORS 408.290. The CHRO will relay this information to the respective agencies, prompting them to review the circumstances. This process aims to help agencies address potential discrepancies and prevent payroll overpayments.

## SUMMARY

This document outlines the Oregon Department of Administrative Services (DAS) Chief Human Resources Office's (CHRO) approach to ensuring compliance with human resource laws, rules, and policies within Oregon state government. It provides an overview of the CHRO's role as an enterprise resource for strategic direction and leadership in HR matters and describes the mechanisms for conducting compliance reviews and corrective actions.

The HR Compliance program ensures adherence to personnel statutes, rules, and policies by conducting post-audit reviews as required by ORS 240.311. This involves broad evaluations and oversight of HR practices across state agencies to ensure a dependable and skilled workforce.

The three key compliance focus areas for 2025 are as follows:

1. ADA and Reasonable Accommodation in Employment
2. Special Merit Increase (*under Merit Pay System policy*)
3. Exceptional Performance Recognition Leave with Pay (*under Special Leaves with Pay policy*)

Additional compliance areas to be monitored year-round include:

- Span of Control
- Temporary Appointments
- Patient Protection and Affordable Care Act (ACA)
- Military Leave

Each review will provide key findings and practical recommendations to enhance compliance, transparency, and effectiveness in HR operations, supporting the CHRO's role in upholding high standards across the state workforce.

For questions, comments, or concerns, please reach out to [chro.compliance@das.oregon.gov](mailto:chro.compliance@das.oregon.gov).