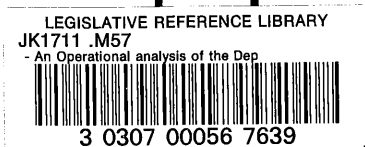


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DEPARTMENT OF ADMINISTRATION



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AN OPERATIONAL ANALYSIS

OF THE

DEPT. OF HUMAN RIGHTS

MANAGEMENT ANALYSIS DIVISION

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Pursuant to 1985 Laws, ch 301, sec 42

Progress by the Department of Human Rights has been slow and sporadic. Only the first phase of the Backlog Reduction Plan has been completed. Phase II is not scheduled to begin until March. It is important to note that the project can bring fast results; Phase I resulted in reducing the inventory of open cases by over 300.

Reorganization has also been slow. After the strategies were initially developed and approved the bulk of the reorganization could have been completed by the end of December, 1983. As a result of sporadic activity and a series of delays by the agency, no part of the reorganization has been formally implemented at this time. Reorganization is now scheduled for January 31, 1984. Strategy C - Improving Policies and Procedures remains on schedule with the first due date being in mid-February.

Changes in the Department of Human Rights need to be made. Decisions should be crisp and clearly communicated throughout the agency. Strong verbal commitment on the part of Human Rights top Administrative Team is not sufficient. Leadership must be shown and accepted by the staff. Multiple delays, poor communication and decisions which are routinely changed, have left the staff frustrated and skeptical that improvements will be achieved. The Department of Administration's Transition Team shares the doubts of the staff. We have seen little evidence of the leadership skills which are necessary for the agency to become responsive and efficient. The legislature should carefully review the department's progress prior to approval of new positions for FY '85. The current situation must be brought under control before expanding either the department's authority or complement.

Respectfully submitted,


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Commissioner

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AN OPERATIONAL ANALYSIS

OF THE

DEPT. OF HUMAN RIGHTS

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DEPARTMENT OF HUMAN RIGHTS FINAL REPORT

I. INTRODUCTION

In the 1983 Legislative Session, the Commissioner of Administration was mandated by Laws of Minnesota Chapter 301, Section 42, to:

"... assign a transition team to work with the commissioner of human rights in reviewing or developing charge intake and charge processing policies. Specific action plans shall be developed for the purpose of improving the administration and enforcement of the Human Rights Act. The commissioner of administration shall report to the legislature by February 1, 1984, on the action plans developed and an analysis of the resources needed to accomplish the statutory responsibilities of the commissioner of human rights."

This report presents the approach and plan used to complete the study, the results, strategies for improvement, and implementation plans for each strategy.

II. BACKGROUND

The Department of Human Rights was created in 1967 to secure compliance with the Minnesota State Act Against Discrimination, later known as the Human Rights Act, Minnesota Statutes, Chapter 363.

The agency is small. The Department of Human Rights currently has 46 employees and an approved complement of 59. After suffering a series of budget cuts in FY '83, 8 positions were restored and funded for FY '84. With approval from the Governor after consultation with the Legislative Advisory Commission, the complement will increase to 65 in FY '85.

The department has not, since its creation, been able to close as many cases as are filed in one year. In effect, it has always had a carry-over of cases. On December 31, 1983, the department had 3,243 open cases.

Several factors have contributed to the historic inability of the department to remain current with its caseload. They include:

- 1) increased coverage by the Human Rights Act without concomitant increases in budget or staff complement
- 2) increased public awareness which has led to increases in the number of charges filed

- 3) an organizational structure which has historically had approximately two people in management or auxiliary positions for every one person doing investigations.

The department's history over the past five years shows that it closes an average of 1,098 cases per year while it receives 1,421 new cases per year. It is clear that without major changes in its structure and procedures, the department will never be able to become current with its caseload.

In the past five years, the Legislature and the Legislative Audit Commission have recommended strategies and the Legislature has appropriated positions and dollars in order to help the department reduce its backlog caseload. The apparent inability of the department to implement changes recommended by these groups led to the formation of a Transition Team from the Department of Administration to work with the Commissioner of Human Rights in developing and implementing major structural and procedural change.

III. APPROACH

In order to identify specific problems and issues in the Department of Human Rights, the Transition Team assigned by the Commissioner of Administration developed an approach which included four phases:

- I. Data Collection
- II. Data Analysis
- III. Development of strategies and action plans for improving options of the Department of Human Rights
- IV. Implementation of recommended changes by the Department of Human Rights

Data collection included: conducting structured interviews with all employees in the department, either singly or in groups, observation of the department staff and operations, and development and analysis of charge¹ intake and case processing procedures. The data was collected with the full cooperation and assistance of staff of the Department of Human Rights. Staff participated openly in interviews, provided all requested data, and eagerly offered their ideas on ways to solve the agency's problems. The data collection and analysis phases were conducted by the Transition Team. A development of strategies and action plans was a collaborative effort by Human Rights top management and the Transition Team. Many hours were spent

¹ A charge is the formal, legal documentation of a complaint by a citizen. A case is the set of records and documents kept by the department to support investigation of a charge.

determining strategies which would both resolve problems and be feasible for implementation.

The methodology also included formation of a Review Team, whose purpose was to monitor both the development and implementation of charge strategies. The Review Team included (a) the Commissioner and Deputy Commissioner of the Department of Administration, (b) the top management of Department of Human Rights, (c) a representative from the Governor's staff, (d) individuals who staff Senate Finance and House Appropriations Committees, (who served in an ex-officio capacity), and the Chair of Governor Perpich's Blue Ribbon Task Force on Human Rights.²

The remainder of this report contains the findings which emerged from analysis and synthesis of data, recommended strategies for improvement, and progress by the department in implementing the strategies.

IV. FINDINGS

Analysis of data revealed problems and issues that sorted themselves into seven areas:

- 1) Procedures
- 2) Distribution of workload/resources
- 3) Accountability
- 4) Communication
- 5) Planning/Decision Making
- 6) Investigation
- 7) Federal Contract

Discussion of each problem area is presented below.

Before you read the list of problems, which is lengthy, we would like to point out that some of these problems are not new. Problems like the organizational structure and open caseload were inherited by the department's top administrative team.

1. Procedures

- o Few written procedures exist for either charge intake or case processing.

² The Governor's Blue Ribbon Task Force was created by Governor Perpich to review four operation areas which are 1) budget, 2) management, administration, and case processing, 3) operations, staffing and laws of other states, and 4) education and outreach.

- o Existing procedures are inconsistently applied throughout the department.
- o There are no written or unwritten policies defining the "best" way to investigate a case.
- o Investigators investigate, gather information, and decide when to terminate investigations using different decision rules.
- o Intake staff and investigators gather the same information on cases.
- o Unnecessary steps exist in the investigation process. Procedures for moving cases through the process also result in bottlenecks. For example, the case file is physically moved more often than necessary during the investigation process.
- o Each Case Processing Unit has a unique set of procedures for tracking cases.
- o Forms used for intake and case processing are poorly designed. For examples, charging parties have difficulty completing the intake questionnaire, and internal forms do not collect information efficiently.
- o No standard method for organizing case files exists.

2. Utilization and Distribution of Workload/Resources

- o Some units in the agency have very little work.
- o Some staff with light work loads have offered to work in case processing, but their offers have not been accepted.
- o Some supervisors won't let their clerical staff assist other units even though they have a small workload.
- o Staff have been inappropriately assigned to special projects.
- o Only 30% of agency staff are actively involved in processing cases. In other words, 2.6 supervisors and auxiliary staff support every investigator in the agency.
- o The average span of control for supervisors in Intake and Case Processing Units is 2.8 employees. In fact, one supervisor has only one Enforcement Officer in the unit. In spite of the narrow span of control, supervisors are not "working supervisors."
- o The Case Processing Units do not make optimal use of the Management Information System (MIS). A set of manual records is kept in each unit even though most of the information could be drawn from the MIS.

3. Accountability

- o Employees' position descriptions bear little relationship to the work that they actually do.

- o No consistent criteria exist with which to evaluate the performance of any member of the staff.
- o No qualitative or quantitative standards for evaluating case processing exist in the agency.
- o Staff, at all levels, are not held accountable for their performance.
- o Staff, at all levels, are allowed to ignore directives because there is no follow-through. For example, a memo by the Commissioner directing the top Administrative Team to report to work early enough to monitor attendance was never acted on or enforced.
- o Neither staff nor supervisors are adequately supervised. For example, some full-time employees do not work a full 40 hour week.

4. Communications

- o Staff are given different and inconsistent information on the same issue. For example, staff were told on different occasions over six weeks that a position affected by the reorganization would be filled by a) reassignment, b) open posting, c) using temporary rules.
- o Top management decisions are not communicated to staff.
- o Employees do not get information that they should, or are promised, about activities occurring in the agency. For example, despite a promise to share the change strategies, staff have not yet been told how the three strategies were chosen and why they complement each other.
- o Inappropriate information is shared with other employees, (e.g., supervisors discussing an employee's performance with another employee.)
- o Staff assignments are not clearly communicated.
- o Staff are unaware of the information they could get from the Management Information System.

5. Planning/Decision Making

- o No comprehensive and integrated operational plan has been developed for the agency by the department's top Administrative Team.
- o Project planning and coordination is negligible. Timelines and deadlines are frequently shifted. For example, the department announced five different start-up dates for the Backlog Reduction Project. None of them have been met.
- o Decisions are made with inadequate information and without adequate consideration of the implications.
- o Decisions are often made without consideration for policies and procedures. This is particularly true with personnel decisions.

- o Staff feel they can't get a decision from top management and when they do, decisions frequently change.
- o Some staff take advantage of or compensate for the lack of planning and decision making by setting their own policies and procedures.

6. Investigation Techniques

- o Enforcement Officers are not formally trained to conduct investigations.
- o Employees feel the thoroughness of investigations depends upon the technical skill of the investigators' supervisor and also on who trained the investigator.
- o Investigators have no clear understanding of what is too much or too little investigation.
- o Staff feel there is not adequate review of the quality of their investigations and determinations.

7. Federal Contracts

The Equal Employment Opportunity Commission (EEOC) and Housing and Urban Development Department (HUD) Contracts create major issues for the Human Rights Agency. We believe the contracts and their impact warrant separate discussion from the problems and issues already discussed.

The Department of Human Rights negotiates contracts with the federal Equal Employment Opportunity Commission and Housing and Urban Development Department to investigate a determined number of cases per year. They agree to investigate cases which are covered by both state and federal law. When cases are completed by the department, it is reimbursed for part of the cost of investigating a case. In FY '83, the average cost of investigating a case in the Department of Human Rights was \$850. The department was reimbursed \$375 per case by EEOC and \$500 by HUD. For FY '84, the Department of Human Rights has agreed to complete 757 cases for EEOC and 40 for HUD.

The department's utilization of resources, decision making, and configuration of the caseload has, to a large extent, been dictated by these contracts. The impact has been a negative one.

- o The department processes a disproportionate percentage of contract cases at the expense of those covered only by state statute (non-contract) cases. Although 54% of the cases docketed annually over the last three years have been non-contract cases, only 43% of the cases closed in the same period were non-contract.
- o The production by investigators varies greatly across months and increases dramatically as the department's EEOC contract nears closure. Figure 1 shows that average

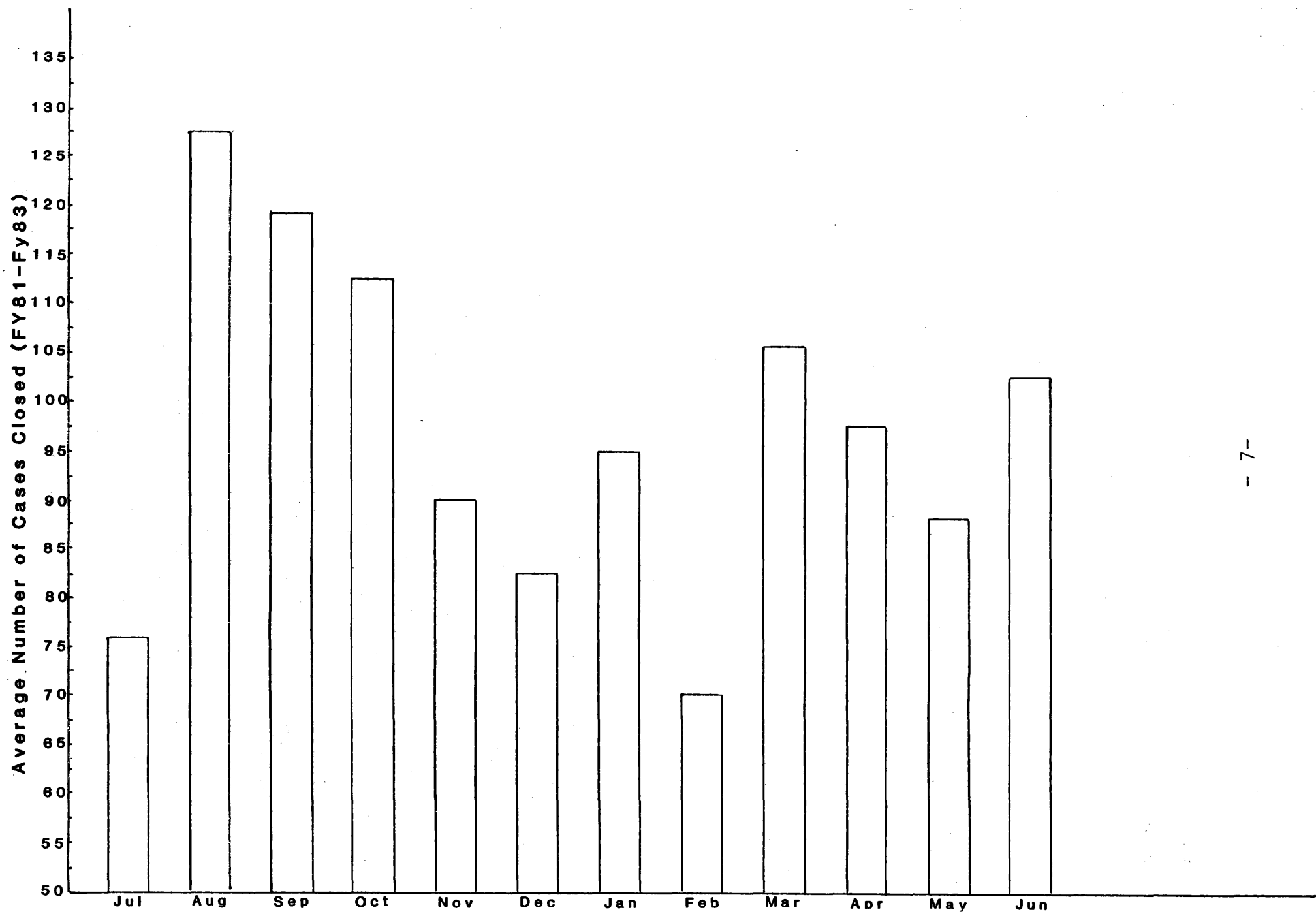


Fig. 1. Average Number of Cases Closed per Month FY81-FY83

production for the months of August and September is, in general, much higher than for other months.

- o Although the Administrative Team states they could refer up to 425 cases per year to local human rights agencies - commissions, the department referred only 65 cases in FY '83. Referrals could be a significant factor in reducing the department's open caseload. One rationale for not referring cases, (e.g., to the Minneapolis Human Rights Department), is that the Department of Human Rights would not receive reimbursement for those cases because Minneapolis is also under EEOC contract.
- o No rationale can be posited for the department not referring more cases to St. Paul, whose director stated at a Blue Ribbon Task Force meeting, that they could accept 200 more cases per year.
- o As the EEOC contract deadline approaches, staff state they are strongly encouraged to find No Probable Cause determinations.
- o Fewer Probable Cause determinations are reached on contract cases than on non-contract cases (See Figure 2.)

The list of issues and problems is long. Some of these problems are long standing ones that were inherited by the current top Administrative Team. Despite their longevity we believe solutions for these problems are achievable. Following are our recommendations directed toward solving existing problems.

V. STRATEGIES FOR IMPROVEMENT

Three broad change strategies were developed by the Transition Team and top management in the Department of Human Rights. These strategies were presented to the Review Team for discussion and subsequent approval. Briefly, the strategies included:

- o A Backlog Reduction Project - a nine week effort aimed at closing all "simple closures" in the department.
- o A Reorganization - an effort resulting in more evenly distributed workload, clarification of responsibility and increased accountability.
- o Improving Policies and Procedures - developing and revising policies and procedures to more efficiently and effectively process charges.

We believe implementation of these strategies would resolve most problems enumerated in the previous section. (Table 1 shows which problem areas are addressed by each strategy.)

We recognize the magnitude of the changes and the need for strong management commitment and leadership to successfully implement the plan. The strategies were, therefore, presented to top management of the Department of Human Rights in October and the detailed action plans in November to ensure assistance

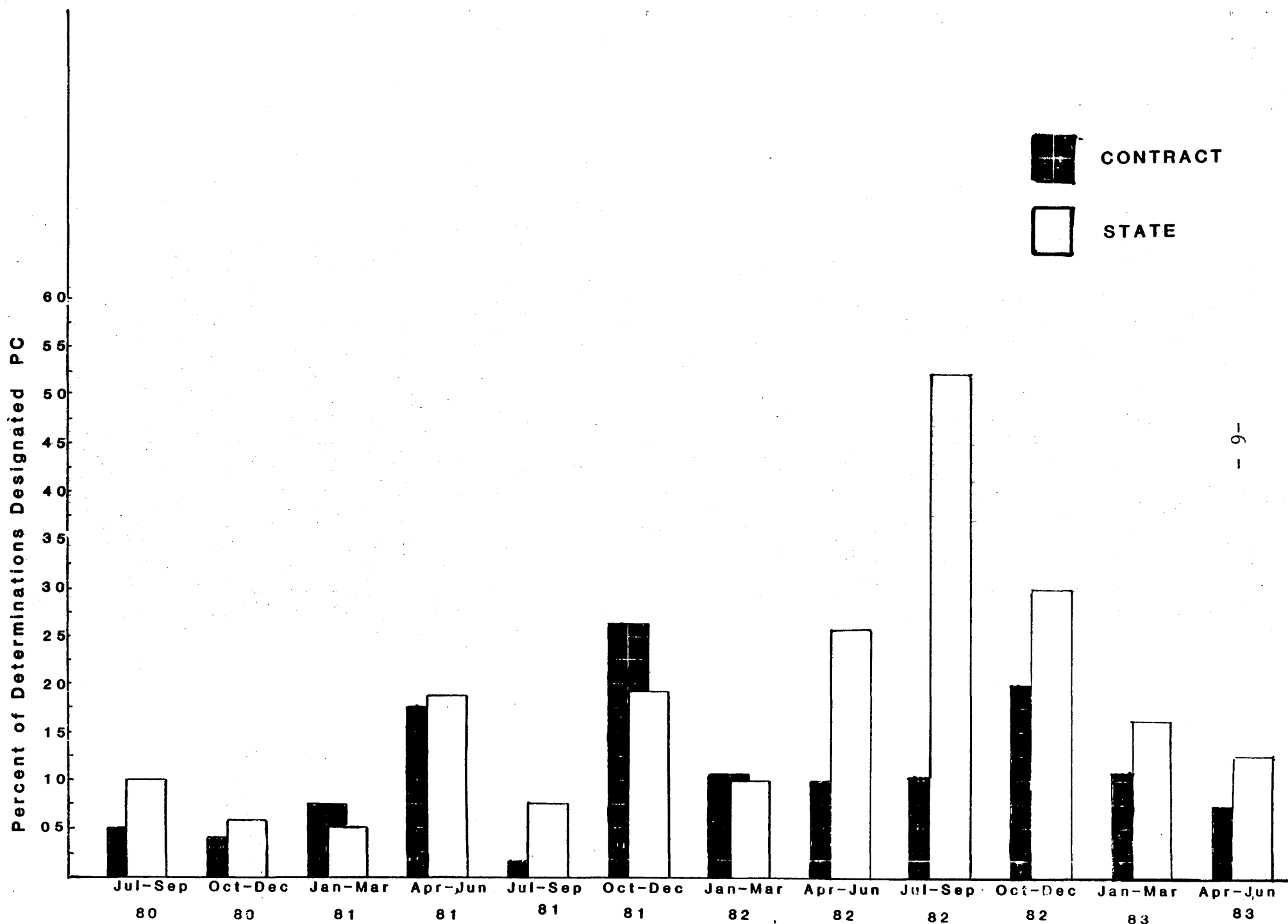


Figure 2: Percent "Probable Cause" Determinations for Contract Non-Contract Cases FY81-83

TABLE 1
PROBLEM AREAS ADDRESSED BY EACH STRATEGY

| | <u>STRATEGY A BACKLOG REDUCTION PROJECT</u> | <u>STRATEGY B REORGANIZATION</u> | <u>STRATEGY C IMPROVING POLICIES AND PROCEDURES</u> |
|--|---|--------------------------------------|---|
| Procedures | | X | X |
| Distribution of Workload/Allocation of Resources | X | X | |
| Accountability | | X | X |
| Communication | | X | X |
| Planning/Decision Making | | | X |
| Investigation Techniques | | X | X |
| Federal Contracts | | X | X |

could be readily obtained from the Transition Team, Department of Employee Relations, and any other necessary sources. It was our intent to allow the Department of Human Rights to show major accomplishments prior to delivery of this final report. The presentation was also done to minimize stress on the agency by maximizing time available for fine tuning the plans.

In the remainder of this section a description and rationale for each strategy are presented.

Strategy A - Backlog Reduction Project

The objective of the Backlog Reduction Project is to assess the status of cases in the open caseload and close those cases nearest completion. In other words, to reduce the number of open cases. Of the cases which are in the department and are older than 6 months, it is estimated that 20% could be closed with little expenditure of resources.

The Backlog Reduction Project is divided into three steps.

- Step 1.
 - a) Attempt to contact each Charging Party with an open case older than eighteen months. If the Charging Party could be located they would be asked whether or not they wanted to pursue the case. If not, the case would be closed. If the Charging Party could not be located after repeated attempts, the case would be closed following standard procedures.
 - b) Review and close all cases in the department which have only the review step left before closure
 - c) Review all Minneapolis/St. Paul referral cases where the investigation has been completed.
- Step 2. Attempt to contact each Charging Party with open cases greater than six months but less than eighteen months old. If a Charging Party could be located they would be asked whether or not they wanted to pursue the case. If not, the case would be closed. If the Charging Party could not be located after repeated attempts, the case would be closed following standard procedures.
- Step 3. Close all cases with only a few steps left in the investigation process.

The Backlog Reduction Project would be a concerted effort to assess case status and complete "simple closures". All three

steps could be completed in nine weeks if a Backlog Reduction Headquarters was set up and staffed with four people eight hours a day. The staff would be trained, provided with necessary equipment (e.g., phones) and materials to effectively complete the task. Careful records would be kept to demonstrate the impact of the project. The implementation plan for this strategy is included in Section VI.

Strategy B - Reorganization of the Agency

Two aspects were carefully considered when planning the agency reorganization. The design of the structure and the assignment of responsibilities to support the design were both treated as being equally important. Each is addressed separately in the following text.

The design of the reorganization was jointly developed and supported by the Transition Team and the top Administrative Team of Human Rights. The proposal was also reviewed and approved by the project Review Team. The proposed organizational structure has the following features:

- o Intake and Case Processing Units would be combined into a single function. When the Intake Unit is dissolved, these staff will be transferred to a case processing unit. Combining the functions has a number of advantages, including:
 - elimination of steps now duplicated by the two units
 - increased assurance that all the necessary questions are asked the first time the Charging Party is interviewed.
 - enhanced opportunity to screen cases earlier and more effectively
 - opportunity for the Investigator to plan the case while gathering information
- o The number of staff processing cases would be increased from 14 (30%) of the agency's staff to 26 (44%) of agency staff.
- o Responsibility for Contract Compliance would be moved from the Assistant Commissioner to the Deputy Commissioner. Compliance staff would be supervised by the director of Planning Services.
- o Equal attention would be given to both contract cases and state cases.

With the reorganization, the agency would have three divisions: External Services Division, Enforcement Services Division, and the Management Services Division. These would be managed by the Assistant to the Commissioner, the Assistant Commissioner, and the Deputy Commissioner, respectively.

The External Services Division would have responsibility for legislation, external education and outreach, and public affairs. The Division would be staffed by the Assistant to the Commissioner, a clerical person, and three professional staff for a total complement of five. The Enforcement Services Division would be composed of four case processing units and a training officer. Each Case Processing Unit would have:

- o one Enforcement Supervisor
- o one clerical support staff
- o one Enforcement Officer Intermediate
- o one Human Rights Aide
- o 4 or 5 Enforcement Officers

Total complement of the Enforcement Services Division would be 37.

The Management Services Division, under the direction of the Deputy Commissioner, would be responsible for Fiscal Services, Personnel Services, the Management Information System, the Department's Central Records, internal training, internal policy and procedure evaluation, internal trend analysis, and Contract Compliance. The complement of the Division would be 17. The proposed organizational structure is presented in Figure 3. The structure is not presented as the ideal structure for the agency. Rather, it was designed to meet the needs of the current top Administrative Team.

We strongly believe the reorganization will benefit the organization in many ways.

The new organizational structure would provide the necessary staff resources to ensure old cases are being closed while new cases are being handled in a timely manner. In making assignments in each unit, staff would first be assigned to work on new cases in order to stay current. The remaining staff would be assigned to work on old cases. For example: if the unit has five Enforcement Officers and will receive 288 new cases in the next year, assuming that an Enforcement Officer can close eight cases per month, three Enforcement Officers would be needed to remain current on the unit's caseload. The remaining two Enforcement Officers would be assigned to old cases. In situations where, as an example, two and a fraction Enforcement Officers are needed to remain current with the caseload, the Enforcement Officer Intermediate would have a caseload split between current and old cases and coordinate old case closures.

The proposed structure for the organization increases the percentage of the department's staff working directly with cases from 30% to 44%.

The new organization will also more evenly distribute workload by setting speciality areas for each of the Case Processing

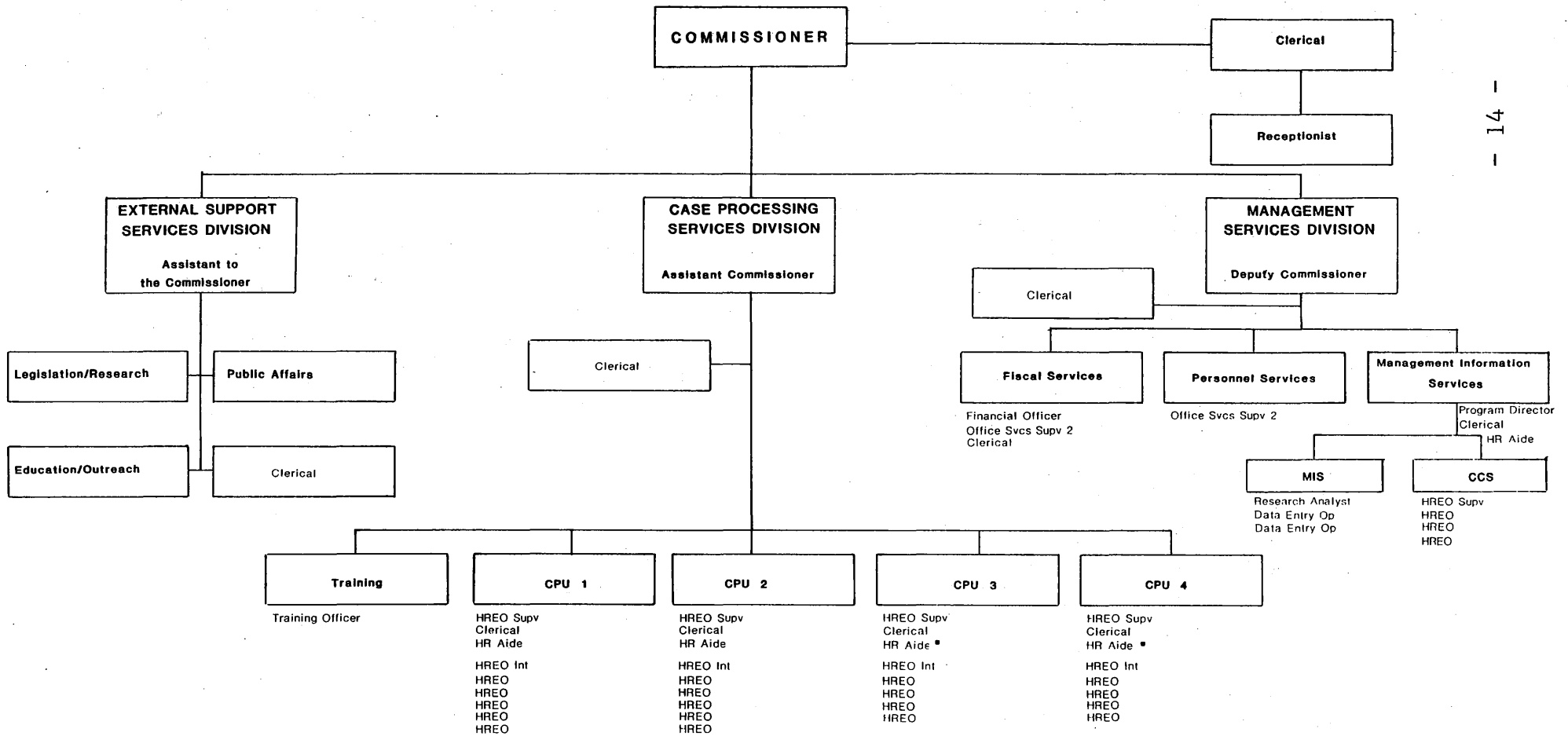


FIGURE 3: PROPOSED ORGANIZATION CHART

▪ POSITIONS WILL BE HELD VACANT UNTIL
OTHER POSITIONS CAN BE RECLASSIFIED
OR NEW POSITIONS ARE ALLOCATED

Units. We have recommended the units by Jurisdiction categories as follows:

| | | |
|----------------------|----|---|
| Case Processing Unit | 1: | Employment, Reprisal, Credit |
| Case Processing Unit | 2: | Employment, Housing |
| Case Processing Unit | 3: | Employment, Aiding/Abetting, Education |
| Case Processing Unit | 4: | Employment, Public Service, Public Accommodation |

Under this strategy employment cases (80% of the cases docketed per year) are spread evenly across all units. Specialization within Employment cases may be possible. Old cases would also be assigned to units by specialty. For example, education cases would go to the unit specializing in Education, etc.

The proposed structure will allow the agency to expedite the processing of cases. Assigning staff to work on only current cases and to carry those cases from intake of the charge through investigation will greatly reduce the amount of time necessary to process a case. Other efficiencies will be gained through procedural changes including those presented under Strategy C.

With the proposed structure, assignments of responsibility and resources, the agency will be current with its caseload in 30 months or less.

The proposed reorganization obligates the agency to the task of revising position descriptions. As new position descriptions are developed each must clearly outline responsibilities and authority for individuals in the organization. Lines of communication must be clarified. Clear position descriptions will provide an important vehicle for increased accountability. Even with new position descriptions in place, strong management and leadership will be necessary to ensure that individuals are held accountable for their jobs and appropriate actions are taken if individuals do not meet the job requirements. It is also recognized that the agency needs a strong Administrative Team to set the example and serve as a model for the employees.

The major steps necessary to complete the reorganization are discussed in Section VI of this report.

Strategy C - Improving Procedures

The completion dates for all steps in Strategy C - Improving Procedures - fall after this report's completion date (See Figure 4, Section VI). Only the more important procedural changes³ are presented in this report. The recommended changes presented herein are divided into short-term changes - those that will be implemented as concurrent with the reorganization, and long-term changes.

We would like to note that a significant number of recommendations for procedural change had their origin in staff suggestions.

Short-term changes

- o Increased use of thorough personal or telephone interviews of charging parties to gain as much information as possible early in the investigation.
- o Minimized use of written questionnaires which frequently have to be mailed several times between the department and the charging party.
- o Drafting and signing of charges while the charging party is in the department for their interview.
- o Encourage referrals to local human rights agencies and commissions.
- o Increased use of pre-charge settlement techniques (e.g., No Fault Grievance).
- o Simplification of forms and letters.
- o Encouraging complainants to examine alternative means of settlement before filing a formal charge.
- o Enforcement of deadlines for Charging Parties and Respondents.

Long-term changes

- o Encourage increased predetermination settlement of cases.
- o Establish investigation guidelines and parameters.
- o Encourage investigators to attempt more conciliation after a Probable Cause determination.
- o Train investigators in established investigation and interviewing techniques.
- o Increase the use of fact finding conferences.

³A flow chart of current operations was prepared and is available on request.

- o Reduce the quantity of review on Probable Cause Determinations and increase the review of No Probable Cause Determinations (perhaps by sampling) to shift the incentives for the staff from finding No Probable Cause to finding Probable Cause.
- o Develop incentives for staff to find Probable Cause and investigate potential Probable Cause cases.
- o Record and report all information on case status using the MIS.
- o Delegate scheduling and recordkeeping tasks to the Human Rights Aide in the unit.
- o Reduce the number of form letters.
- o Produce all form letters using either the MIS or word processors.
- o Train all clerical staff on word processing operations.
- o Revise forms to make them shorter and clearer. Automate forms where possible.
- o Enter case tracking information into the MIS directly from the unit.
- o Inform charging Parties and Respondents more clearly of reasons for Probable Cause and No Probable Cause determinations and of the procedures that the agency will follow.
- o Develop processes which will allow investigators to use the MIS.
- o Reduce response times for Charging Parties and respondent information.

VI. IMPLEMENTATION AND STATUS

The action steps and deadlines that were agreed to in October by the Administrative Team are presented in Table 2 along with the current projected deadlines and status. A visual presentation of the timeline is presented in Figure 4. In addition to the action steps, a detailed, daily decision chart was prepared for the reorganization and given to the top Administrative Team.

In this section, the progress on each strategy will be discussed.

Strategy A - Backlog Reduction Project

Step 1 of the Backlog Reduction Project, contacting charging parties with open cases older than eighteen months and reviewing cases in the department awaiting review, was completed on schedule. Of the 1,050 cases addressed in this step, 30% or 304 cases were closed as of January 15, 1984.

Step 2 of the Backlog Reduction was delayed several times by the agency. At present, they plan to implement Step 2 in March, 1984.

Step 3 will not begin until Step 2 is completed. The start date for Step 3 is undecided at this point.

Strategy B - Reorganization

Looking at the currently proposed completion dates for all steps of the reorganization (See Figure 4) one can see that the reorganization has slipped approximately two months. There are two primary reasons for the slippage. The first is that the agency, after initially agreeing with the proposed organizational structure, and beginning work to implement it, proposed an alternative structure. The Transition Team determined that the alternative structure had the following shortfalls:

- o The workload was uneven across units. While one unit would not have a caseload heavy enough to keep the investigators busy, another had a caseload that the investigators could not keep up with. This would result in a constantly growing number of open cases in the department.
- o It would have taken significantly longer for the department to become current with its caseload.

The Department of Human Rights reversed its position and again began working to implement the organizational structure which they initially agreed to and which is included in this report. The second reason for delay is uneven attention to implementation. For a few days after Review Team meetings and status meetings with the Transition Team, top management would make progress on the reorganization. After the spurt of energy other activities would become top priority and the reorganization, like the Backlog Reduction Project, would be set aside. An additional problem related to the reorganization is the inability of the agency to fill vacant positions. As of the date of publication of this report, the agency has not filled the positions that were allocated by the Legislature in July of last year. These positions were allocated to assist in reducing the backlog. The agency did not, initially, consider the amount of time that it would take to complete all of the necessary state procedures in order to hire new staff. They did not, therefore, begin the process at the end of FY '83, as they could have. The currently proposed hire date for the new investigators is February 1.

Strategy C - Improving Procedures

The Department of Human Rights is in the process of reviewing the short-term recommendations for procedural change. At this point, the Department of Human Rights has not received an exhaustive list of long-term recommendations from the Transition Team for procedural change.

TABLE 2

DEPARTMENT OF HUMAN RIGHTS IMPLEMENTATION PLAN

| <u>STRATEGY</u> | <u>ORIGINAL COMPLETION DATE</u> | <u>STATUS/PROPOSED COMPLETION DATE AS OF 1/20/83</u> |
|---|-------------------------------------|--|
| Strategy A | | |
| BACKLOG REDUCTION PROJECT | | |
| Step 1. Cases greater than 18 months old | 10/27/83 | Completed review of Cases |
| Step 2. Cases 6-18 months old | 11/18/83 | 3/9/84 (completed review of cases) |
| Step 3. Close easily closable cases | 12/16/83 | Undecided |
| Strategy B | | |
| REORGANIZATION | | |
| Step 1. Develop structure | 10/21/83 | Completed 1/6/84 |
| Step 2. Develop documentation | 12/2/83 | Completed 1/6/84 |
| Step 3. Complete staff assignments | 11/18/83 | Completed 1/16/84 |
| Step 4. Complete work with DOER | 12/19/83 | 1/13/84 |
| Step 5. Announce reorganization | 11/15/83 | Completed 1/16/84 |
| Step 6. Develop layout/phone system | 12/13/83 | Completed 1/6/84 |
| Step 7. Develop intake/case processing procedure | 11/29/83 | 1/27/84 |
| Step 8. Determine Unit specializations | 12/5/83 | 12/14/83 |
| Step 9. Filling new positions | 12/15/83 | 2/29/84 |
| Step 10. Develop training materials | 12/15/83 | 1/27/84 |

| | | |
|---|----------|-------------------|
| Step 11. Train staff | 1/13/84 | 2/29/84 |
| Step 12. Implement Management Services Structure | 11/28/83 | Completed 1/16/84 |
| Step 13. Implement Enforcement Services Structure | 1/15/84 | 2/15/84 |
| Step 14. Implement External Services Structure | 12/31/83 | 2/15/84 |

Strategy C

IMPROVING PROCEDURES

| | | |
|---|---------|---------|
| Step 1. DoA review flowcharts/ provide comments to DHR | 2/10/84 | 2/10/84 |
| Step 2. DHR review DoA comments | 3/16/84 | 3/16/84 |
| Step 3. Develop new/revised procedures | 4/13/84 | 4/13/84 |
| Step 4. Review new procedures | 4/30/84 | 4/30/84 |
| Step 5. Develop training materials | 5/31/84 | 5/31/84 |
| Step 6. Train staff | 6/29/84 | 6/29/84 |

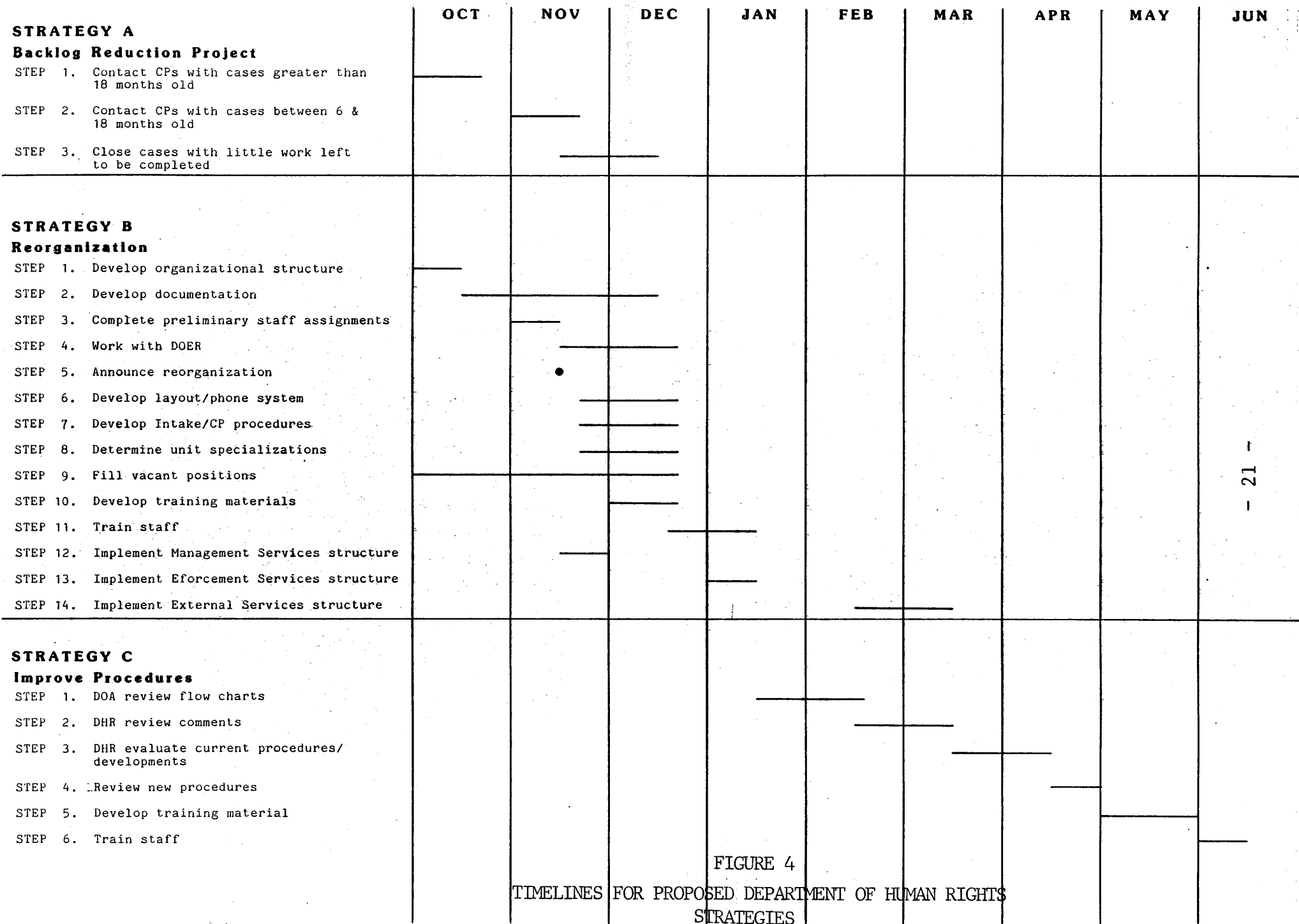


FIGURE 4

TIMELINES FOR PROPOSED DEPARTMENT OF HUMAN RIGHTS STRATEGIES

VII. CONCLUSION

We would like to reiterate the fact that, although the problems which exist in the Department of Human Rights are severe and long-standing, they are not insurmountable. With implementation of the strategies presented in Section V, by a team with strong management and leadership skills, the department could become current with its caseload in thirty months or less.

Only when the agency is able to show strong evidence of progress in implementing the strategies described in this report, should the proposed increase in staff allocation be approved.