

- (2) An identified process for notifying staff of updates;
- A process or procedure document for staff communication (may be included with the handbook/policies)
 - Samples of agency communication of policy change notification to staff

And

(3) Include sample (10% of CSBG employees) documentation that personnel policies have been made available to employees

And

- (4) Documentation of the location and availability of the Personnel Policies
- Can be a link to a website if it contains the required information

Maintained: As needed/More frequent than annually

Standard 7.3 - The department has written job descriptions for all positions. Updates may be outside of the purview of the department.

Documentation must include the following three things:

- (1) "All positions" can be identified in an Organizational chart(s) or Staff list with role titles

And

- (2) The agency's job descriptions
- Sample job descriptions (minimum of 10% CSBG employees)

And

- (3) Dated documentation noting that the descriptions have been updated within the past 5 years.

Maintained: Every 5 years

Standard 7.4 - The department follows local government procedures for performance appraisal of the department head.

Documentation should show:

- 1) That a policy/procedure is in place by the parent agency or municipality
- Policy/procedures pertaining to performance appraisals

And

- 2) That the department followed that procedure.

- Performance appraisal sign-off
- An official email/memo/letter stating the appraisal was completed according to policy

Maintained: Annually

Standard 7.5 - The compensation of the department head is made available according to local government procedure.

Documentation should show:

- 1) That a policy/procedure is in place by the parent agency or municipality
 - Performance appraisal sign-off

And

- 2) That the department followed that procedure.
 - Where salary information is posted

Maintained: Annually

Standard 7.6 - The department follows local governmental policies for regular written evaluation of employees by their supervisors.

Documentation must show the local procedure and evidence that the department follows it.

Maintained: Maintain on an ongoing basis

Standard 7.7 - The department provides a copy of any existing local government whistleblower policy to members of the tripartite board/advisory body at the time of orientation.

Documentation must include both of the following:

- (1) The Whistleblower Policy (May be found in the agency's Personnel Policies or Employee Handbook) which includes anti-retaliation language.
 - Whistleblower policy

And

- (2) That the tripartite board/advisory body was provided with a copy of an existing whistleblower policy
 - Board minutes

And

7.4 and 7.5 - Standards for Effective HR Governance

A. Guidance on the Definition and Intent of the Standards

STANDARD 7.4: The department follows local government procedures for performance appraisal of the department head.

STANDARD 7.5: The compensation of the department head is made available according to local government procedure.

One of the greatest risks to both private and public agencies is unethical or fraudulent behavior between individuals with access and power. Through a fair and consistent performance evaluation, transparency and confidence in the direction of the department and the use of public funds is maintained.

Guidance on the intent behind requiring federally funded agencies to have the board appraise executive performance comes from OMB's Compensation-Personal Services regulations contained in the OMB's 2 CFR.

The Office of Management and Budget's Uniform Guidance (2 CFR Part 200.430 and 431) dictates requirements as to the allowability and the reasonableness of costs associated with federal grant awards. Compensation decisions must follow the department's written policies, as well as comply with "comparability" rules that set the guidelines for how to go about ensuring fair and transparent compensation for the most high profile roles in grant-funded organizations. OMB's Uniform Guidance for compensation is in section CFR 200.430 (a) through (g).

Beyond creating more transparency and accountability for the agency externally, the board and organization benefit from enhanced communication and clearer expectations through the process. There are several other reasons these Standards are included in the HR Management Category:

- **Manages the risk of executive power and control of resources.** Incorporating an annual performance evaluation in conjunction with an annual compensation review is a key step to reducing the exposure risk of the agency (and the Network) to recent public fraud and ethics issues. Proactively assessing the performance of top leaders helps to ensure the public trust and keeps the executive focused on goals important to the mission and services of the agency. Using a scheduled compensation review creates a culture of accountability to federal grants and other revenue that goes towards payroll and benefits.

B. Guidance on Compliance and Documentation

STANDARD 7.4: The department follows local government procedures for performance appraisal of the department head.

STANDARD 7.5: The compensation of the department head is made available according to local government procedure.