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Review

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SUBJECT: Citywide Policy Review

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INVESTIGATOR: J.S.

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02/24/2022
Date of Approval

DISTRIBUTION:

- Honorable Mayor**
- President City Council**
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- City Attorney**
- Department Director**
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INTRODUCTION

The City of Albuquerque (City) has many policies and procedures, some covering all departments and some that are department specific. The purpose of this review is to identify all policies and procedures, current and archived to be maintained for historical purposes. The Office of Inspector General (OIG) initiated a review of the City and departmental policies in February 2021.

Background

The Office of Inspector General has conducted numerous investigations and noticed an inconsistency among City departments with regard to the existence and organization of policies and procedures. The City Administration does initiate overarching policies, which are updated as a need arises and these policies are maintained on the City of Albuquerque website. Each Department Director is responsible for updating and maintaining their policies and procedures in accordance with the City, Introduction to Personnel Rules and Regulations: Application Rules and Procedures, dated February 1, 2001, which states:

Individual department policies, rules, regulations, and procedures can be promulgated with the concurrence of the Human Resources Director and the approval of the Chief Administrative Officer to ensure they are not in conflict with the substance of the Merit System Ordinance and the Personnel Rules and Regulations.

OIG Review Approach

The OIG reviewed the City and Departmental policies. Our preliminary objectives were to assess the City's efforts to: (1) maintain and update policies and procedures to ensure efficiency and consistency, and (2) review whether the City or Department policies and procedures are accessible to all City employees and receipt of those policies and procedures are acknowledged by employees.

OIG Survey of City Department Directors

On March 31, 2021, the OIG distributed a survey to twenty-one (21) City of Albuquerque Directors or Interim Directors charged with oversight of their respective departments. Our survey was designed to obtain feedback on department specific policies and procedures, including Directors views on the following elements: (1) the existence of current and previous policies and procedures; (2) the location of current and previous versions of policies and procedures; (3) how these policies and procedures are relayed to staff; (4) whether employees acknowledge receipt and review of the policy as indicated by a signed acknowledgement; and (5) are department policies reviewed annually.

The survey results were reviewed by the AGO committee in July 2021. Due to the high turnover of Department Directors during the period of the initial survey, the AGO committee recommended the survey be re-visited. The survey was re-sent to all Directors/Interim Directors on October 18, 2021. The survey questions remained unchanged from the original survey to ensure consistency.

The OIG's second survey, sent on October 18, 2021, was open through November 9, 2021. Seventeen (17) responses (an 81 percent response rate) were received. While the survey allowed aggregation of the number of departments that had policies and procedures, narrative responses were also requested to assist in the identification of specific department challenges. Aggregate and narrative survey results are included in relevant sections throughout this report.

Survey Response Summary:

The survey results were not verified as part of this review. Of the seventeen (17) responding departments:

Regarding Objective 1, Element 1: the existence of current and previous policies and procedures

- Thirteen (13) departments have current policies, SOP's or procedures separate from that of the COA general employee regulations, rules and policies.
- Two (2) departments use the COA general employee regulations, rules and policies.

Regarding Objective 1, Element 2: the location of current and previous versions of policies and procedures

- Ten (10) departments know the location of previous policies.

Regarding Objective 2, Element 3: how these policies and procedures are relayed to staff

- Sixteen (16) of seventeen (17) responding departments indicated their policies are maintained in specific locations accessible to employees.
- One (1) department provides copies of their policies upon request.

Regarding Objective 2, Element 4: whether employees acknowledge receipt and review of the policy as indicated by a signed acknowledgement

- Four (4) departments have staff acknowledge policies and procedures by signing a copy upon hire and as revisions are issued.

Regarding Objective 1, Element 5: department directors review policies annually

- Ten (10) departments review their policies annually.

Conclusion and Recommendations:

The City has many policies and procedures both at the Citywide level and departmental level. Policies are inconsistently created, promulgated, maintained, and reviewed.

Based on the above conclusion, the OIG provides the following recommendations for consideration with regard to policies and procedures:

- The City should consider creating a division of Human Resources dedicated to the review, approval and maintenance of all department policies and procedures.
- The City should consider implementing a tracking system for all policies and procedures to ensure that Department Directors are reviewing policies and procedures annually.
- The City should consider a management system to ensure that policies and procedures are approved by HR, the CAO, and if necessary Legal counsel, before being posted to the website.
- The City should consider developing an outline of the process for policy creation to include departmental development, review, staff and public availability, and retention.
- The City should consider creating a template for policy development, providing an official format with letterheads, narrative headings, effective dates, revisions dates, and director signature/approval.
- The City should consider using one website that consolidates all policies and procedures into a hierarchical (Citywide and departmental) format. Sections for archived and current versions should be implemented to aid in management of previous versions of policies and procedures.
- The City should consider providing open access to all citywide and departmental level policies and procedures on the website.
- The City should consider requiring only approved, website posted policies be recognized as City policy.
- The City should consider requiring that each policy be reviewed, at least annually, by both the Department Director and Department Staff.
- The City should consider requiring every employee sign an acknowledgment form upon hire and when policies are revised to ensure staff acknowledgment for accountability.

These suggested recommendations will encourage transparency, accessibility, and retention of policies and procedures, as well as employee accountability. They will also facilitate discovery, in the event that archives are necessary for IPRA, legal matters and/or educational purposes.