HR Compliance - An Uncommon Approach at the University of California

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Topics

- Overview of UC’s Compliance Organizational Structures
- UC’s Statement of Ethical Values
- About the Systemwide HR Organization
- Overview of HR Compliance Projects
- Keys to Success
- Challenges
- What’s Next
UC’s Compliance Structure

Office of the President

Systemwide Human Resources

Ethics Compliance and Audit Services

UC Locations

UC’s Statement of Ethical Values

University of California

Statement of Ethical Values
### About the Systemwide HR Compliance Organization

<table>
<thead>
<tr>
<th>Policies, Collective Bargaining Agreements, and HR Practices:</th>
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<tbody>
<tr>
<td>- Recruitment/Promotion</td>
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<td>- Compensation</td>
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<td>- Absence from Work</td>
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<td>- Performance Mgmt</td>
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<td>- Awards &amp; Incentives</td>
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<td>- Disciplinary Action</td>
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<td>- Personnel Records</td>
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<th>HR Related Regulations:</th>
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<td>- HEERA</td>
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<td>- FLSA</td>
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<th>Benefits:</th>
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<td>- ACA</td>
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<td>- Group Insurance Regulations</td>
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<th>Retirement:</th>
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### HR Compliance Roles and Key Accomplishments

- Pay and HR Practices Equity Study
- I-9 Vendor System and Integration with UCPath
- Family Member Eligibility Verification
- And much more...
I-9 Vendor & HRIS Integration

ICE Raids Texas Technology Company, Arrests 280 Over Immigration Violations

Employers Beware: ICE Is Ramping Up I-9 Audits to Record Levels

In Phase I of the current operation, between Jan. 29 and March 30, 2018, HSI served 2,540 NOIs and made 61 arrests. During Phase II, between July 16 and 20, HSI served 2,738 NOIs and made 32 arrests.
I-9 Vendor & HRIS Integration

• Implemented an I-9 Vendor systems solution across all UC locations & Integrated it with our HRIS

• Field level edits and guided document options help hiring offices avoid significant risks

• Optional document imaging is available, and required for E-Verify

• Dashboard features keep I-9s moving on time

• Remote capabilities support pre-hire Section 1 and using an agent for Section 2

Family Member Eligibility Verification

• Vendor verifies dependent eligibility shortly after enrollment through an integration with our HRIS

• Dis-enrollments are processed monthly - annual savings average $8 Million per year

• Triennial recertification of relationships that may change such as due to divorce or changes in financial support – estimate annual savings $20 Million
Organizational Collaboration

- Systemwide HR Disciplines such as Comp, Benefits, ER/LR, etc.
- Chief Human Resource Officers at each location and their teams
- Academic Personnel
- Payroll Coordination (financial management and taxation)
- UCPath Center
Ethics, Compliance and Audit Services (ECAS) and Risk Services - Key HR Related Roles

- Whistleblower Complaint Hotline and Investigations
- Clery and CANRA
- Compliance Training
  - Sexual Harassment Prevention
  - Cyber Security
  - Conflict of Interest
- HIPAA
- Workers Compensation Insurance
- Employment Liability

Keys to Success

Just the Facts: a data driven approach
Keys to Success

Tone at the Top

Challenges

• No carrots, limited sticks
Keys to Success

• Tone at the top - Having a head of HR who is committed to compliance
• Data and Data Integrity
• Collaboration across the HR discipline – compliance belongs to all of us
• A team oriented tone - “we are here to look out for you, not to catch you in the act”
• Influence and service as a means to get things done
• CCEP certifications and managing with integrity