



Oregon

Tina Kotek, Governor

Department of Administrative Services

Chief Human Resources Office

155 Cottage Street NE

Salem, OR 97301

FAX: 503-378-6879

Date: December 1, 2025

To: Statewide Agency HR Leaders

Subject: 2026 Human Resources Compliance Action Plan

2026 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.

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

ASSESSMENT DETAILS

MANAGEMENT PERSONNEL AFFIRMATIVE ACTION EVALUATIONS

Purpose of the Review

To determine if state managers and supervisors are evaluated on their effectiveness in achieving affirmative action objectives as part of the performance management process.

Key Areas of Assessment

The review will assess critical areas, including:

- Management Personnel Evaluation Methods:
 - How affirmative action objectives are captured and communicated.
 - How affirmative action objectives are included in the performance management process.
- Maintaining Documentation and Records:
 - Agency documentation practices.

Evaluation Standards

Evaluations will be measured against:

- ORS 659a.012(1): [State agencies to carry out policy against discrimination in employment; evaluation of supervisors; affirmative action reports](#)
- Executive Order 22-11 - https://www.oregon.gov/gov/eo/eo_22-11.pdf

Scope of Review

All Executive Branch agencies

Timeline and Reporting

Review Period

- January 2026 – April 2026

Findings and Recommendations:

A comprehensive report highlighting where compliance is met and where improvement is needed will be shared with agency leadership, the Department of Administrative Services' Office of Cultural Change (OCC), and the Governor's Office.

DISCRIMINATION AND HARASSMENT FREE WORKPLACE

- Designated Individual
- Completion of Follow Up Contacts

Purpose of the Review

To determine agency compliance with the requirements state HR policy 50.010.01 Discrimination and Harassment Free Workplace as it relates to the responsibilities of designated individuals and their alternate, as well as follow up contacting requirements.

Key Areas of Assessment

The review will assess several critical areas, including:

- **Identification and Notification of Designated Individuals and their Alternate**
 - Agencies have identified a designated individual and alternate responsible for receiving complaints of prohibited conduct.
 - Agency employees are notified of the designated individual and alternate when required.
 - Agencies notify CHRO upon each change of the designated individual and alternate.
- **Required Actions and Documentation of the Designated Individual or their Alternate**
 - State HR policy 50.010.01 is provided to employees when required.
 - Appropriate documentation and maintenance of records is maintained.
- **Follow Up Contacting**
 - Agencies conduct follow up contacts with the employee of the alleged workplace harassment once every three (3) months for the twelve (12) calendar months following the date the complaint was received, unless a waiver is signed.

Evaluation Standards

Evaluations will be measured against:

- State HR policy: [Discrimination and Harassment Free Workplace](#) (50.010.01) ORS 243.319 and ORS 243.321: [Workplace Harassment](#)
- ORS 659a.375: [Prevention of Discrimination and Harassment](#)

Scope of Review

All agencies subject to ORS 240

Timeline and Reporting

Review Period:

- May 2026 – July 2026

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.

ADA AND REASONABLE ACCOMMODATION IN EMPLOYMENT

Purpose of the Review

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

- 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 are offered reasonable and timely accommodations.
- Individuals with disabilities have access to work and opportunities.
- Employees have access to and receive notification of the ADA policy when required.

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.
- **Policy Notification**
 - Accessible accommodation procedures and signs posted about ORS 659A rights in visible and accessible work areas.
 - Consistent distribution of notice to:
 - New hires at onboarding.
 - Employees within 180 days of the policy effective date.
 - Pregnant employees within 10 days of notification.

Evaluation Standards

Evaluations will be measured against:

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

Scope of Review

Sampling of large, medium and small agencies who were not included in the 2025 review.

Timeline and Reporting

Review Period

- August 2026 – October 2026

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.

WORK OUT OF CLASS

Purpose of the Review

To evaluate agency compliance with state policy regarding the general 12-month duration for Work-out-of-Class (WOC) assignments, ensuring that all assignments are appropriately documented, justified, and managed within policy limits. This review aims to identify potential risks, gaps, or patterns of non-compliance and recommend corrective actions.

This review will focus on:

- All active and closed WOC assignments within the 25-27 biennium
 - Assignments labeled as Temporary Duties WOC.
 - Assignments with missing or incomplete documentation.
 - Assignments that exceed 12 months or lack justification.

Key Areas of Assessment

- Verification that required documentation is present and complete for each WOC assignment (job classification, start and end dates of the assignment, clear reason for assignment, signed and dated appropriately).
- Confirmation that internal assessments and justifications are conducted for exceptions when applying a differential greater than 5%.
- Evaluation and confirmation of higher classification duties before authorizing WOC pay differential.
- Assessment of coding accuracy and pay differential adjustments in Workday.
- Validation of record retention for all required WOC documentation.

Evaluation Standards

Evaluations will be measured against:

- The state HR policy on Work-out-of-class (WOC) under [Pay Differentials](#) (20.005.11).

Scope of Review

Sampling of large, medium and small agencies subject to ORS 240.

Timeline and Reporting

Review Period:

- October 2026 – December 2026

Findings and Recommendations:

Findings and recommendations may include:

- Instances of WOC assignments exceeding 12 months without documented justification.
- Lack of evidence that alternatives to extended WOC were considered.
- Repeated use of WOC for the same position without reclassification action.
- Establish a quarterly WOC duration review process at the agency level.

Objective

To ensure that WOC assignments are administered appropriately and in alignment with policy expectations, particularly the general guidance that such assignments typically do not exceed 12 months, and to support consistent, equitable, and policy-compliant practices across all Executive Branch agencies.

YEAR-ROUND COMPLIANCE MONITORING

Exceptional Performance Recognition Leave with Pay

- Pursuant to the [Special Leaves with Pay](#) (40.025.01) policy
- Frequency: *End of fiscal year*
- The CHRO will gather documentation of the amount and reason Exceptional Performance Recognition Leave with Pay was awarded to employees by agencies in the previous fiscal year and review for compliance with policy.

Military Leave

- Pursuant to the [Military Leave](#) (60.000.25) policy, ORS 408.290
- Frequency: *Monthly*
- 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.

Span of Control – Maximum Supervisory Ratio

- 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.

Span of Control – Exemption Compliance

- Pursuant to the [Span of Control](#) (30.000.20) policy, ORS 291.204, ORS 291.227
- Frequency: *Monthly report*
- The CHRO approves agency exemptions to hire one or more additional supervisory employees when the agency's actual supervisory ratio is greater than the agency maximum supervisory ratio. 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: *Monthly beginning August 1, 2025*
- 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.

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 four key compliance focus areas for 2026 are as follows:

1. Management Personnel Affirmative Action Evaluations
2. Discrimination and Harassment Free Workplace
3. ADA and Reasonable Accommodation in Employment
4. Work Out of Class

Additional compliance areas to be monitored year-round include:

- Exceptional Performance Leave with Pay
- Military Leave
- Span of Control – Maximum Supervisory Ratio
- Span of Control – Exemption Compliance
- Temporary Appointments

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.