



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF AGING
Harrisburg, Pa. 17101

PENNSYLVANIA DEPARTMENT OF AGING

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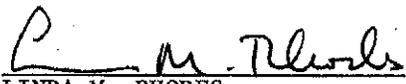
Division of Field Operations
717-783-6213

AGING PROGRAM DIRECTIVE

SUBJECT: PERSONNEL ACTION PLAN FOR PRIVATE NON-PROFIT AREA AGENCIES ON AGING (AAAs)

TO: COUNTY COMMISSIONERS
CHAIRPERSON, NON-PROFIT AAA GOVERNING BOARDS

INFORMATION: EXECUTIVE STAFF
FOR: DIVISION OF FIELD OPERATIONS
AREA AGENCIES ON AGING
AoA REGION III
PA COUNCIL ON AGING
PA STATE ASSOCIATION OF COUNTY COMMISSIONERS
COMPTROLLER

FROM: 
LINDA M. RHODES
SECRETARY
DEPARTMENT OF AGING

LEGISLATIVE REFERENCE: Older Americans Act, as amended 1987, 42 U.S.C. 3001 et seq.

PURPOSE: The purpose of this Aging Program Directive (APD) is to set standards for the private non-profit AAAs to insure compliance with Federal Merit System Standards for Personnel Administration. It is not intended for the public AAAs which are already covered by a merit system by virtue of their contracts with the State Civil Service Commission.

BACKGROUND: Section 307(a)(4) of the Older Americans Act, as amended, requires the State Unit on Aging to provide assurances that it has established, and maintains, personnel standards on a merit basis as are necessary for the proper and efficient administration of the State Plan. The development of standards for implementing personnel policies is instrumental in the effective administration of an

agency. Since employees are the most important resource of the AAA, it is imperative that they be managed properly.

CONTENT:

The Personnel Action Plan (PAP) is intended to be used as a guide in assisting Area Agencies on Aging (AAA) to develop personnel policies. It contains the ingredients for a viable personnel system, but it will be the responsibility of the agency director to implement the system, tailoring it to meet the needs of the agency. The PAP will also form the basis for the Department's review and evaluation of AAA personnel management programs.

I. Position Classification

A position classification system is an integral part of a personnel program. It provides a basis for "equal pay for equal work."

The classification system begins with the development of up-to-date job descriptions for all agency employes. The duties of each position should be described in detail, outlining specific differences between positions. The job descriptions should then be maintained on a current basis and modified to reflect any changes in duties and responsibilities. Although the ideal situation is to reflect these changes as they occur, at a minimum, they should be updated at least annually, preferably during the employe's performance evaluation. Included is a form that could be used for this purpose (see Attachment A).

In addition to a job description for each position, class specifications should be developed for each position or group or positions which have similar duties, e.g., caseworkers. Class specifications include a general description or definition of work being performed, examples of duties, and the knowledges, skills, and abilities and minimum experience and training requirements an individual should possess to be considered for employment in a position in that class. Class specifications are used to insure that positions performing similar work are compensated at the same rate of pay (equal pay for equal work). They are also used as the basis for recruiting and determining which candidates possess the qualifications for a position and which candidates do not.

II. Compensation

A compensation plan should be developed that reflects the differing levels of work, complexity and responsibilities of the various positions. All rates of pay should be equitable and reflect the compensation rates of the current local labor market. They should be consistent with the appropriate collective bargaining agreements or other employe organizations to achieve equitable and adequate compensation. It must also be remembered, however, that the Department of Aging will only reimburse agencies up to the maximum of the pay range

established for that particular class on the Commonwealth Pay Plan.¹ Costs incurred above these maximums must be absorbed by the local AAA from resources which are not provided or governed by the Department.

In addition to the compensation plan, each agency should have narrative explanations and rules for any circumstances which affect their pay practices, such as exceptional pay increases, above-the-minimum appointments, promotions, demotions, working out-of-classification, etc. These policies should outline under what conditions pay changes will occur and include the criteria used to evaluate such changes.

III. Recruitment and Placement

The ability to attract suitable candidates for employment is important to the successful operation of the agency. As stated previously in the Position Classification section, minimum experience and training requirements should be established for each position, so that when vacancies occur, it can immediately be advertised and, if necessary, special efforts made to recruit minorities, women, older workers or other groups that might be underutilized. The agency should also maintain a general recruitment file of applications and resumes of candidates who have expressed interest in employment with the AAA.

Selection procedures should be consistent with the Federal Uniform Guidelines on Employee Selection. This means that the recruitment, selection and advancement of employees will be based on their relative knowledges, skills and abilities. The agency, when appropriate, should choose among qualified employees within the agency to fill higher-level vacancies in order to promote the development of agency staff.

In addition, procedures should be developed for the evaluation and interview of candidates to ensure that selections are based on job-related criteria and, where applicable, in accordance with collective bargaining agreements.

IV. Training

Training and career development opportunities enhance employee development. Training programs offer employees a chance to improve present skills and/or acquire new ones to enhance career advancement potential.

¹For example, if the maximum reimbursement for a Caseworker employed by the Commonwealth is \$19,000, this would be the highest amount of reimbursement given to the agency for a position which performs similar duties.

A systematic approach for the evaluation of training needs should be developed, with an individual training plan for each employee based on his/her strengths and weaknesses. Performance evaluations can serve as an important tool in determining each employee's training needs.

Efforts should be made to develop training resources to meet recognized training needs. Training programs should be provided not only for the purpose of improving the skills necessary to perform present duties, but also to prepare employees for more responsible assignments. All training programs should be job related and based on the priority needs of the employee and the agency.

V. Performance Evaluation

The performance evaluation system aids employees and managers in the assessment of skills and abilities that are necessary for the performance of the work. Performance evaluations serve as documentation for inadequate or exceptional performance and may serve as a means for determining training needs and possible personnel actions, such as merit increments, promotions, demotions, and/or discipline. Managers and employees shall be aware of the rating factors and what constitutes acceptable performance required to meet or exceed the factors being rated. The performance evaluation system shall be uniform and administered equitably.

- 1) A performance appraisal system shall be implemented which will allow supervisors to develop standards of performance acceptable for the particular position and to rate employees based on those standards. Employees are to be advised when they are hired and/or at the beginning of each rating period what the standards for acceptable performance are for their position. Standards shall be realistic and employees evaluated on a systematic, job-related basis. Employees in the same or similar positions should have the same or similar performance standards. Intervals of time should be established between ratings which allow for performance requirements to be adequately measured. The performance evaluation, when done accurately, will be a good indicator for a number of personnel functions.
- 2) The job descriptions, which outline the duties and responsibilities required of the incumbent, serve as a tool in determining performance standards. The job description should reflect the actual duties of the position and should be updated when changes occur.

- 3) The performance rating shall be discussed with the employe and will become a permanent part of his/her personnel folder.

IV. Discipline and Grievance

Policies regarding employe conduct should be developed and communicated to all employes. Standards should be set so that employes understand what is expected of them. The disciplinary policy should be stated in positive terms, not in terms of retribution, since its primary purpose is to correct unsatisfactory behavior.

Guidelines should be developed for handling disciplinary problems; progressive discipline, which is utilized for dealing with successive minor infractions, usually consists of:

1. Oral reprimand
2. Written reprimand
3. Suspension without pay
4. Dismissal

Suspension with pay, demotion and/or transfer can also be used as steps in progressive discipline. For the most severe infractions, an employer may opt to go directly to suspension without pay or even dismissal, without going through the oral or written reprimand steps of progressive discipline. In all cases of discipline, due process which includes a pre-disciplinary meeting with the employe must take place. The purpose of this meeting is to afford the employe the opportunity to rebut the charges and/or present their side of the story.

Grievance procedures allow for employes to appeal disciplinary actions and, therefore, grievance procedures should be in writing for purposes of communication and conformity. When an employe is hired by the agency, he/she should be advised of his/her appeal rights in the event of disciplinary action.

VII. Affirmative Action

Title VII of the Civil Rights Act of 1964 prohibits discrimination in employment on the basis of race, religion, age, sex, creed, color, national origin, union membership, marital status, lifestyle, political affiliation or any other non-merit factor. In complying with the act, agencies must commit themselves to equal employment, and are required to have a written plan. The development of a written Affirmative Action (AA) Plan outlines the agency's commitment to affirmative action and serves as a monitoring tool for personnel actions occurring within the agency.

Affirmative action programs will be developed and implemented to assure equal employment opportunity. The agency will prohibit discrimination in any employment process on the basis of any criteria that are not bona-fide occupational qualifications. In developing AA plans, agency work force analysis and local area labor force characteristics will be reviewed. This information will be used to determine if and where underutilization exists, and will be a basis to develop recruitment plans and AA goals.

The Department of Aging, in order to be consistent with State and Federal regulations, requires that AAA grant employment preference to qualified individuals age 60 and over. In order to monitor this practice among non-profit agencies and exempt positions, we are requiring that the following information be recorded and submitted in the Affirmative Action Plan and updates as requested by the Department of Aging:

1. Recruitment Efforts - If not being filled through promotion or reassignment of a current AAA employe, any position becoming vacant as of July 1, 1987 shall be advertised throughout the Aging Network (i.e., senior citizen publications/newsletters, senior centers, church and civic groups, etc.). The following information must appear in the advertisement:
 - Job titles and number of vacancies, if multiple
 - Location of the vacancy
 - Brief description of the jobs
 - Job requirements
 - Special requirements or conditions (shift work, travel, required licensure)
 - Starting salary or salary range (minimum and maximum)
 - Contact person
 - Final date for receiving applications
 - Identification as an "Equal Opportunity Employer"

2. Application Flow Data - An Internal Auditing System is currently required as part of the Affirmative Action Program to monitor the personnel actions in the agency. This system should be utilized for recording the status (i.e., age, sex, race, etc.) of candidates applying for a particular position in your agency. Only those persons who meet the qualifications and are interviewed for the position(s) should be listed. Such records must be kept for each vacancy for five years. Once a candidate is chosen, indicate by placing an asterisk by the name of the individual. These listings will become a permanent part of and must be submitted as part of the Affirmative Action Plan. Additionally, all

applications should be kept on file in your office for future reference/review for five years.

Agencies must take precaution in developing systems to collect data on applicants for employment. No information should be collected which will not be considered in an employment decision. However, where self-identification is necessary, a statement explaining the need for and use of the requested information should accompany the request. Applicants should also be informed that the provision of this data is optional and that choosing not to provide it is not a bar to employment. This information should be requested on a supplement or addendum to the employment application and not as a part of the regular application form. This information should then be maintained in a separate recruitment folder and not with the employment application or in official personnel folders.

VIII. Work Policies

It is important that employes understand what is expected of them and, in turn, what they can expect of the agency. This can be handled by a comprehensive set of work rules that deal with issues such as work hours, call-in times, lunch periods, furlough, sick and vacation leave, etc. It is suggested that these policies be developed in writing so that they are available for new personnel, as well as serving as a reference in administering disciplinary action, if necessary. If the work rules are written, there is less chance of misinterpretation by the staff.

CL/ds