


Mary H. Talley

FROM	NAME & TITLE	Mary H. Talley, Director & Chief Human Capital Officer	CITY OF BALTIMORE MEMO	
	AGENCY NAME & ADDRESS	Department of Human Resources 201 E. Baltimore Street, Baltimore, Maryland 21202		
	SUBJECT	City of Baltimore Council Bill, 15-0589 Employees' Retirement System		

TO

The Honorable Bernard "Jack" Young
and Members of the Baltimore City Council
City Hall
100 N. Holliday Street, Room 409
Baltimore, Maryland 21202

DATE:

December 16, 2015

Dear Council President Young and Members of the City Council:

Recommended Position

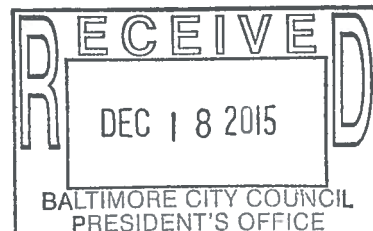
The Department of Human Resources ("DHR") reviewed the above captioned City Council Bill and opposes the proposed changes to Baltimore City Code, Article 22, Retirement Systems. The legislation proposes to grant service credit for certain pre-employment contractual services provided to the City; provide for computation of that credit, subject to certain a maximum; and specify the provisions for the credit to be applied.

Comments and Analysis

As proposed, City Council Bill 15-0589 (the "Bill"), is not administratively feasible. The Bill requires submission of "supporting documentation" to evidence prior service to the City. The request of such information is likely to result in an increase of workload for city agencies, to identify and locate employment records that may not be readily available. Given that the Bill does not set any defined look back period, employees could conceivably requests records from as far back as thirty-plus years ago, thus imposing the task of locating records that may not be maintained in electronic databases or physically located at the employing agency or DHR.

Also problematic with the proposed Bill is the lack of definition of key terms necessary to effectively interpret and implement the Bill. For starters, the Bill provides that service credit shall be granted to ERS members who have provided pre-employment services to the City on a "personal contractual basis." Given that the manner in which the City has procured contractual services with individuals has varied greatly throughout the years, it is unclear which category of contracted employees the Bill is intended to include. It should also be noted that the City's current Human Resources Information System ("HRIS") database is relatively new (implemented in 2007) and is not robust enough to have captured employee details to include the specificity needed to extract the information that may be necessary to administer this bill. More specifically, it is likely that records transferred from the old database into the new HRIS captured only vital data, like dates of periods of employment and the status of the employee, ie. temporary or regular, but not whether the employee was on a personal contract. Additionally, because the Bill does not define what is "satisfactory" documentation, employees' requests for employment records could be expansive enough to include payroll records, performance evaluations or other any record maintained by the agency. Without greater specificity as to what information is

UF w/comm



necessary to evidence pre-employment services and to which set of employees the bill is intended to benefit, the proposed Bill is administratively unworkable.

For these reasons, DHR opposes this bill.