

EMPLOYEE RECRUITMENT & SELECTION

PROGRAM EVALUATION AND AUDIT



METROPOLITAN
C O U N C I L

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What We Found

What Needs Improvement

HR does not adequately record or monitor data on recruitment and selection milestones to ensure that the recruitment does not exceed 90 days. Two-thirds of positions reviewed took longer than 90 days to complete, with an average length of 162 calendar days from start to finish for randomly selected positions, and 138 calendar days for positions hired by interviewed hiring managers.

HR also lacks documented controls to ensure that the process for quantifying candidate experience and salary offers is standardized, transparent, and equitable.



Photo Caption: Person bikes past mural with flowers and three bicyclists on the Greenway bike trail in Minneapolis.

What We Recommend

HR should create a process to systematically collect, monitor, and analyze recruitment and selection data. HR should also formalize a control that ensures all salary offers are standardized. HR should create and implement a process to share public data with hiring managers without a data request.

Why We Did This Work

The Council underwent increased turnover in 2023, which created a backlog of positions that need to be filled. In 2024, HR implemented the Unified Recruitment Strategy to help prioritize and reduce the backlog of unfilled positions. Despite adopting this strategy, recruitments at the Council routinely took longer than 90 days to complete. We completed this audit to identify bottlenecks in the recruitment and selection process, as well as other barriers to filling vacant positions.

What We Reviewed

We reviewed a total of 152 positions filled between January 1st, 2024, and June 1st, 2025, excluding operators, MTPD sworn officers, and positions hired by or with the involvement of Program Evaluation & Audit staff.

How We Did This Work

For each position, Audit calculated the time elapsed between key recruitment & selection milestones. We also interviewed eight TAS and 21 hiring managers who filled positions within the scope of the audit, as well as HR leadership. Finally, Audit reviewed the Affirmative Action Plan and interviewed HR and OEEO leadership about its implementation.

Summary of Findings

Number	Description	Recommendation	Follow-up Action	Page
Observation 1	HR and OEEEO Do Not Maintain Quality Data on Recruitment and Selection Milestones	HR should identify a milestone that constitutes the beginning of the recruitment and selection process and ensure that the date aligns with the Council's Affirmative Action Plan, EEO Program, and all other HR documentation.	Confirmation	14
		HR should collect data on when recruitment and selection milestones occur, aligned with the milestones that are listed on the Standard Recruitment and Selection Timeline. HR should ensure its HR system can produce the data in a useful format.	Confirmation	14
Observation 2	Positions Take Longer than 90 Days to Fill and Surpass Industry Benchmarks	HR should compare the length of time elapsed between milestones to industry benchmarks and set a target for overall time-to-fill for continuous improvement.	Confirmation/Retest	20
		HR should assess the recruitment and selection milestones that are causing the most significant bottlenecks and, and align or allocate resources, or combine or eliminate steps to address areas causing the greatest delay.	Confirmation	20

Observation 3	Controls Not Adequate to Ensure Standardized Compensation Offers	The Metropolitan Council Cabinet should work with HR to define a strategy that guides Council compensation offers.	Confirmation	25
		HR should create and document a process that outlines how employee credentials are quantified and weighted in the salary analysis process.	Confirmation	25
		HR should adhere to the classification review schedule and ensure that all Council positions are reviewed on a cyclical basis.	Confirmation	25
Observation 4	HR and OEEO Do Not Monitor When Protected Groups Withdraw from the Recruitment and Selection Process.	HR should create and implement a process to collect and analyze data on when candidates withdraw from the recruitment and selection process.	Confirmation	28
Observation 5	HR is Not Sharing Public Data as Part of the Salary Analysis Process	HR and OGC should define what recruitment and selection information hiring managers have a business need to know.	Confirmation	30
		HR should create and implement a process for sharing salary comparator information, such as salary, job, and education history for current employees with hiring managers.	Confirmation	30

Introduction

Background

The Metropolitan Council consistently hires qualified professionals to carry out its mission. In 2024, the Council hired 1,130 total employees. In the first two quarters of 2025, the Council hired 556 employees (Table One). Across all divisions in 2024, 25.3% of new hires were women, and 58.9% were people of color (Table Two). The Council’s Talent Management team in its Human Resources (HR) department manages the recruitment and selection process. Including vacancies, Talent Management currently has 32 employees.

Table One: Count of Vacancies Filled by Council Division in 2024 and in Q1 and Q2 2025¹

Division	Count of Hires in 2024	Count of Hires in 2025 (Q1-Q2)
Environmental Services	65	36
Community Development	34	6
Metro Transit - Bus Operators	484	121
Metro Transit – Other	449	162
Metropolitan Transportation Services	10	1
Regional Administration	88	34
Total	1,130	556

Table Two: Percentage of Vacancies Filled by Women, People of Color (POC), and People with Disabilities by Division in 2024²

Division	Women 2024	Women 2025	POC 2024	POC 2025	Disability 2024	Disability 2025
Environmental Services	29.2%	29.2%	29.2%	18.1%	6.2%	6.1%
Community Development	70.6%	38.2%	38.2%	35.3%	8.1%	11%

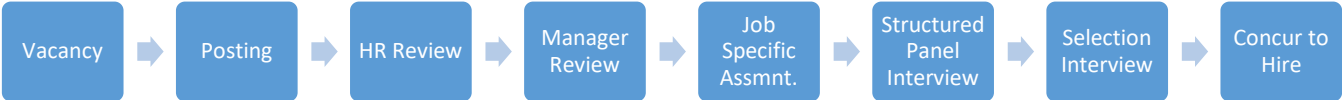
¹Metropolitan Council. (2025). “All Staff HR Workforce Report - Power BI Report.” [Link](#).

²Metropolitan Council. (2025). “All Staff HR Workforce Report – Vacancies Filled by POC & Women - Power BI.” [Link](#).

Metro Transit	22.3%	62.2%	62.2%	62.2%	4.7%	4.6%
Metropolitan Transportation Services (MTS)	50%	10%	10%	8.3%	6.9%	8.8%
Regional Administration	52.3%	28.4%	28.4%	19.7%	11.2%	10.2%

Once a hiring manager submits a requisition, the position is added to the division’s Unified Recruitment Plan, and senior management prioritizes positions for hiring based on the Council’s most urgent need.³ When it is time for the position to be filled, it is assigned to a Talent Acquisition Specialist (TAS). There are eight phases of the recruitment and selection process that every position must go through to be filled. (Figure One) Once the position posting has closed, HR will review the candidate pool for minimum qualifications and then share the remaining candidates with subject matter experts (often hiring managers) to select candidates to interview. Generally, candidates will go through two rounds of interviews: a structured panel interview and a selection interview. Once eligible candidates have completed their interviews, hiring managers will select their top candidate based on how the candidate is scored on the selection interview. The Office of Equity and Equal Opportunity (OEEO) will complete the concur to hire process to verify that the selection process was completed fairly. Finally, once all prior steps are completed, HR will offer the position to the selected candidate.

Figure One: Recruitment and Selection Process Phases⁴



Audit evaluated the recruitment and selection process against HR Policy 7-1 Talent Recruitment and Selection Policy, all associated procedures, recruitment and selection work instructions, and state and federal requirements. Additionally, Audit evaluated the process against benchmarking criteria from the Society for Human Resource Management (SHRM), the largest association dedicated to the practice of human resource management.

³ There are two unified recruitment plans. The first is the MERC, which contains all approved-to-fill positions from Metropolitan Transportation Services (MTS), Environmental Services, Regional Administration, and Community Development. The backlog of approved-to-fill positions at Metro Transit are maintained on a separate plan. For the MERC, the Deputy Regional Administrator is responsible for prioritizing hires. For Metro Transit, the Assistant General Manager of Administration and External Affairs manage the plan. The time positions spend on the Unified Recruitment Plans prior to their assignment to a TAS is not counted or tracked.

⁴ Per HR’s Recruitment and Selection Procedure 7-1a.

Objectives

The objectives of this audit were to:

1. Determine if controls are adequate according to the Metropolitan Council Policy HR 7-1 and associated procedures to ensure that the recruitment and hiring process is effective, efficient, and equitable.
2. Ensure that systems and technology are effective, efficient, and controlled to adequately protect applicant and employee information.

Scope

Audit reviewed all positions hired between January 1, 2024, to June 1, 2025, including both regular and continuous postings. However, the audit excluded interns, Metro Transit bus operators, police officers, and other special recruitments that have a similar, but distinct process. This audit also excluded any positions that were hired by Audit or where its management served on the hiring panel.

Methodology

To determine the adequacy of controls to ensure effectiveness, efficiency, and equity in the recruitment and selection process, Audit reviewed HR policies, procedures, work instructions, and industry best practices. Audit also interviewed eight talent acquisition specialists, 21 hiring managers, and HR leadership to obtain qualitative feedback on the process. Additionally, to assess the effectiveness and efficiency of the process, Audit obtained data for 152 positions from NeoGov to evaluate the number of days elapsed between key recruitment and selection milestones for positions filled between January 1, 2024, and June 1, 2025, from the NeoGov system. Of 152 positions, 19 were hired by Community Development, 41 were hired by Environmental Services, 55 were hired by Metro Transit, eight were hired by Metropolitan Transportation Services (MTS), and 29 positions were hired by Regional Administration. For data that was not available in NeoGov, Audit accessed hard copy records of recruitment and selection milestones, such as the date OEE0 concurred to hire, the date that the background check was completed, and others. Audit evaluated this information against HR's and SHRM's benchmarks.

To ensure that systems and technology are adequately controlled, efficient, and effective, Audit tested role-based access to information stored in the NeoGov system. Auditors reviewed accounts to ensure that the access levels were appropriate and reasonable according to their job duties and business needs.

Audit examined the Council's methods for measuring candidate experience and determining salary offers to verify that methods are transparent and standardized. Finally, the team examined the extent to which HR and OEE0 are monitoring and enforcing the Council's Affirmative Action Plan and EEO Program in accordance with state law and Federal Transit Administration Circular 4704.1A.

Limitations

Auditors encountered significant challenges related to the quality of recruitment and selection data. First, Audit was unable to independently retrieve a sample of hires from the NeoGov system.

Additionally, Audit could not determine the official start date of any recruitment in the sample, because HR maintains that the recruitment process begins when a TAS is assigned to the requisition, while the Affirmative Action Plan states that the process begins when a hiring manager requests the position be filled. HR does not track the date when a manager submits their requisition, when a TAS is assigned to a requisition, or the length of time a position is on the unified recruitment plans. Finally, the NeoGov system used to track all recruitment and selection milestones records two sets of dates: when the milestone was created for a given recruitment, and when the milestone was completed for a given candidate during the recruitment process. HR originally only provided the first set of dates to Audit, and upon discovery, Audit had to re-do some portions of the audit testing.

Despite challenges to obtaining quality data, Audit used the milestone dates listed on hard copies and some NeoGov data to construct the average estimated time elapsed between recruitment and selection milestones. Without an official start date recorded for any requisition, Audit used the position's entry date into NeoGov as a proxy date for the beginning of the recruitment process.

These limitations are further described in Observations One and Two.

Disclosure

The two staff auditors who completed this audit are represented by AFSCME collective bargaining unit. All findings were reviewed and approved by non-represented Audit management.

Recognition

Audit thanks HR, OEEO, and hiring managers across the Council for their support and cooperation throughout this audit.

Non-Finding Observations

During interviews with talent acquisition specialists and hiring managers, interviewees identified items that did not rise to the level of a finding but still offer important insight into the recruitment and selection control environment.

1. TAS and Hiring Managers Reported Issues with Pay History Law

On January 1, 2024, Minnesota enacted a new Pay History Law that prohibits employers from asking about a candidate's previous salary.⁵ The law is designed to prevent previous wage gaps or other inequities from following applicants from job to job. However, both talent acquisition specialists and hiring managers expressed concerns that the law is causing problems recruiting external candidates and retaining internal employees. As such, it may be preventing the Council from attracting and retaining the most qualified candidates for positions. Specifically, hiring managers and TAS reported that it is sometimes difficult to recruit candidates from peer agencies, as the Council cannot always match the salary or benefits reported by the candidate at their former employer, on the basis that the law prohibits HR from considering prior compensation.

Additionally, hiring managers and TAS reported that they believed some internal candidates are offered lower salaries compared to their current position, even if they are receiving a promotion, on the basis that the law prohibits considering prior compensation.

It is correct that employers cannot prompt the applicant to disclose their previous wages or otherwise attempt to obtain this information. However, according to the Minnesota Department of Human Rights, "Under the Minnesota Human Rights Act, if an applicant voluntarily discloses pay history for the purposes of negotiating wages to a prospective employer, the employer can consider and act on that voluntarily disclosed salary history information to support a wage or salary higher than initially offered."⁶

2. Managers Reported Lack of Training and Outreach Guidance

Hiring managers reported that aside from required training on conducting fair and legal interviews, they perceived that there is no comprehensive training for hiring managers on the recruitment and selection process, and that many managers struggled to navigate the requisition process before being assigned to a TAS. Hiring managers also reported that differences in hiring requirements between unions were not readily available.

Finally, hiring managers reported that they believed that social media guides should be updated with a more comprehensive list of job boards and other recruitment sites to reach broader audiences and attract a diverse group of candidates.

⁵ Minnesota Legislature- Office of the Revisor of Statutes. (2025). 363A.08 Unfair Discriminatory Practices Relating to Employment or Unfair Employment Practice. [Link](#).

⁶ Minnesota Department of Human Rights. (2024). Pay History Scenario 5. [Link](#).

3. TAS Workloads are Comparable to Industry Averages

TAS reported having an average workload of 10 requisitions at any given time. Each requisition contains between six and ten positions. Based on SHRM benchmarking, the Council's TAS workload is comparable to the average government agency recruiter,⁷ but below the average workload for a large organization (up to 4,999 employees).⁸

⁷ The SHRM Benchmark Talent Access report reports that government agencies with dedicated in-house recruiters have an average workload of 77 requisitions.

⁸ The SHRM Benchmark Talent Access report reports that large organizations with dedicated in-house recruiters have an average workload of 96 requisitions.

Observations

Observation 1: HR and OEEO Do Not Maintain Quality Data on Recruitment and Selection Milestones

HR does not systematically track key milestones throughout the recruitment and selection process. First, records of recruitment and selection milestones are not stored in a central location. Instead, records are dispersed between NeoGov, in OEEO's network drive, and HR's network drive. Generally, TAS track milestones manually using a checklist word document that is stored in the e-Job File in the network drive.

Additionally, HR does not track when the position is requested by a hiring manager, or later when it is assigned to a TAS. Several positions were missing records of key milestones: 23 positions out of 25 positions that surpassed the 90-day recruitment benchmark were missing dates for recruitment and selection milestones. Specifically, the TAS Checklist was missing or not completed for nine out of 25 recruitments. Multiple milestone dates are documented on these checklists, therefore, for these nine positions, a missing or incomplete checklist resulted in other missing dates for the recruitment, such as the TAS and hiring manager kickoff meeting and the date the candidate accepted the position. Finally, OEEO's concur to hire dates were missing for four out of 25 positions (Table Three).

Table Three: Missing Recruitment & Selection Milestones Among 25 Positions with Time-to-Fill Length Longer than 100 Days

Document/Milestone	Count of Missing
Manager Requisition Request	18
Completed Checklist	9
TAS/Hiring Manager Kickoff	9
OEEO Concur-to-Hire Date	4
Salary Analysis Completed	1
Background Check Completed	2
Hire Justification Memo	3
Offer Accepted by Candidate	9

Audit could not determine the average length of time between when a TAS is assigned to when the offer was made to a candidate and instead used proxy dates to estimate the total time length. Additionally, due to the missing milestone dates above, Audit could not reliably determine where bottlenecks occurred in the recruitment and selection process for the 25 positions that had surpassed the 90-day recruitment requirement.

According to the 2024-2026 Affirmative Action Plan, "The hiring process begins when the hiring manager initiates a business case form for approval of a personnel requisition for a job opening."

HR's Standard Recruitment and Selection Timeline and SHRM's Benchmarking Talent Access Report both outline recruitment and selection milestones (Table Four). According to HR's Standard Recruitment and Selection Timeline, the process should take 12 weeks, beginning when the requisition is created and approved to fill.

Table Four: Comparing Metropolitan Council and SHRM Recruitment & Selection Timelines

Council Timeline	SHRM Timeline
1. Requisition created and approved to fill	1. Position open to position approved-to-fill
2. Duties of position defined	2. Position approved-to-fill to job posted
3. Review and/or establish qualifications	3. Job posted to screening started
4. Review and/or develop assessments	4. Screen applicants
5. Develop recruitment plan	5. Conduct interviews
6. Develop and approve posting	6. Make final decision and extend offer
7. Position posted	7. Offer to acceptance
8. HR assessment of candidates	
9. Hiring manager assessment and selection	
10. Interviews conducted	
11. Hiring decision and salary approval	
12. Contingent job offer extended	
13. Confirm job offer	

In addition to these milestones, the SHRM Benchmarking Talent Access Report also includes overall time-to-fill (the recruitment from start to finish), a cost-per-hire metric, and a metric that tracks requisitions per recruiter.

There are two causes for the process' poor data quality:

1. HR relies on manual processes, controls, and data entry to collect data on the recruitment and selection process. HR also stores milestone data in multiple locations, which prevents HR from systematically analyzing milestone data and identifying bottlenecks.
2. There is conflicting guidance on what date constitutes the official beginning of a requisition. HR states that the start of the recruitment and selection process begins when a TAS is assigned to a position, while the Affirmative Action Plan and Standard Recruitment and Selection Timeline state that the process begins when a manager initiates the requisition. HR is not tracking either date.

Without a standard start date for each requisition, or quality data on recruitment and selection milestones, it is impossible to determine the average total length of a requisition, and difficult to identify bottlenecks in the process. Without accurate data, it is difficult for HR to make improvements to the process, effectively allocate its resources, or be transparent with stakeholders on the recruitment and selection timelines. Poor data quality also impedes the Council's ability to implement and monitor its affirmative action goals. Finally, lack of complete or accurate data impedes Council business units' ability to plan around vacant positions.

Recommendation:

1. HR should identify a milestone that constitutes the beginning of the recruitment and selection process and ensure that the date aligns with the Council’s Affirmative Action Plan, EEO Program, and all other HR documentation.

Management Response: Sara (HR) met with Lila (OEEEO) on March 4, 2026, to discuss this observation. OEEEO owns and manages the Affirmative Action Plan and Equal Employment Opportunity Plan. OEEEO agrees with HR that the timeline proposal to start tracking the 90-day timeframe from the date of assignment to the TAS rather than the date position is vacated. Both the Affirmative Action Plan and the FTA Equal Employment Opportunity Program Plan are due for review, amendment, and submission this year. OEEEO oversees the coordination of plan reviews and submission, with the Affirmative Action Plan deadline of July 1, 2026, and FTA Equal Employment Opportunity Program Plan deadline of October 1, 2026.

Timetable: OEEEO and HR are working on revisions to the AAP which ends June 30, 2026. HR’s review and recommendations will be completed and provided to OEEEO by April 30, 2026.

Staff Responsible: The Human Resources Director – Employee Operations and Senior Manager – Enterprise Equity Lila Eltawely will oversee the revision and implementation of the Affirmative Action Plan and the FTA Equal Employment Opportunity Program Plan. Senior Manager – Talent Management Joyce Masar will develop and implement process expectations and documentation and training of all Talent Acquisition Specialist to ensure clear understanding and alignment with recruitment and selection milestones.

Audit Follow-Up: Confirmation

2. HR should collect data on when recruitment and selection milestones occur, aligned with the milestones that are listed on the Standard Recruitment and Selection Timeline. HR should ensure its HR system can produce the data in a useful format.

Management Response: Management Response: Agree. The applicant tracking system, for the time period the audit review was completed, did not track the length of time each step in the recruitment process took. Starting with requisitions assigned March 9, 2026, HR will utilize an excel document to track each step of the recruitment process for single vacancy recruitment processes. Note: This tracking will not include recruitment processes that have two or more vacancies, recruitments where additional requisitions are added to an existing recruitment exam plan, continuous job announcements, interns, apprenticeships, and/or senior management/executive level.

Areas to be tracked include:

Requisition #
Final requisition approval date
Date requisition assigned to TAS
Council Job Title
TAS
Name of hiring manager
Recruitment strategy meeting date
Date job announcement posted (2)

SME grid – date draft sent to hiring manager (3a)
Date SME grid finalized (3b)
Date HR begins reviewing applications (4a)
Date HR review is completed (4b)
Date first WRE request sent (5a)
Date received last WRE (5b)
Date applications are sent to SME Reviewers (6a)
Date completed SME grid is received by the TAS (6b)
Date structured panel interviews started (8a)
Date structured panel interviews were completed (8b)
Date selection interviews started (9a)
Date selection interviews completed (9b)
Date TAS received hiring justification received by hiring manager (10)
Date background check initiated (11a)
Date background check completed (approved by TAS and HR Manager) (11b)
Date salary analysis prepared for selected candidate (12a)
Date salary analysis is approved (12b)
Date job offer extended to candidate (13a)
Date job offer accepted by the candidate (13b)
Scheduled date for physical and/or drug test (14a)
Date results were received results (14b)
Start date (16)
Comments about recruitment and reasons for any delays

The recruitment timeline begins when the requisition is assigned to a TAS and ends when the job offer is accepted. NEOGOV reports will not be used since multiple actions are performed by the TAS and hiring manager within each step of the exam plan in NEOGOV. The information audit has requested to be tracked is outside NEOGOV capability. Human Resources managers will manually enter the information into an excel tracking sheet once the recruitment has been completed. This will be source for the recruitment time to fill data analysis.

Timetable: Talent Management will track this data beginning with requisitions assigned beginning March 9, 2026, and thereafter. Data review could begin in March 2027. If audit

wishes to review the data earlier, that can certainly be accommodated; however, the number of recruitments available for review would be smaller and would not provide a full year of data for analysis.

Staff Responsible: Oversight of the implementation of this recommendation will be conducted by the Senior Manager Talent Management.

Audit Follow-Up: Confirmation.

Observation 2: Positions Take Longer than 90 Days to Fill and Surpass Industry Benchmarks

101 out of 152 positions sampled took longer than the 90-day benchmark to fill.

Audit took two stratified random samples of positions hired within the audit scope: a general sample (Sample A) of 54 positions, and a sample of 21 hiring managers who Audit first interviewed and then analyzed the 98 positions hired by these managers (Sample B).

In Sample A, 41 out of 54 recruitments took longer than 100 days from the date the position was entered into NeoGov to the employee start date. The average length of time for Sample A positions to be filled was 162 calendar days. In Sample B, 60 of 98 positions took 100 calendar days or longer to fill. For Sample B’s positions, the average time to fill was 138 days. The average time-to-fill for both samples surpassed industry benchmarks (Table Five).

Table Five: Time-to-Fill for Metropolitan Council Positions Compared to SHRM Benchmarks

	Median Number of Days to Fill	Average Number of Days to Fill
Council General Sample (Sample A)	133	162
Hiring Manager Sample (Sample B)	118	138
Council Benchmark	N/A	90
SHRM’s Public Sector Organizations	60	66
SHRM’s Large Organizations (up to 4,999 employees)	50	62
SHRM’s Extra-Large Organizations (5000+ employees)	60	69

Audit drew from Sample A and B to create a third sample (Sample C) of 25 positions that took longer than 100 days to fill, ten days longer than the Council benchmark. Using Sample C, Audit performed detailed time-length testing to identify bottlenecks in the process that may cause delays. Some dates did not exist in NeoGov and could only be manually obtained from HR’s eJobFile in the network drive. While there are significant concerns about data availability and quality, Audit estimated the average length of time elapsed between key recruitment and selection milestones (Table Six).

Table Six: Days Elapsed Between Key Recruitment & Selection Milestones for 25 Positions that Surpassed 90-Day Requirement

Recruitment and Selection Milestones	Average Number of Days Between Milestones
NeoGov Position Entry ⁹ to Start of Job Advertisement	81
TAS/Hiring Manager Kickoff Meeting ¹⁰ to Start of Job Advertisement	89
Start of Job Advertisement to End of Job Advertisement	47
HR Review of Applications to SME Review Applications	6
SME Review to Structured Panel Review	9
Structured Panel to Selection Interview	28
Selection Interview to OEEO Concur to Hire ¹¹	58
Selection Interview to Offer Extended	130
Offer Extended to Offer Accepted ¹²	5

These process bottlenecks were reflected in the interviews with TAS and hiring managers as well. Four of eight TAS reported longer-than-expected delays between milestones. The TAS reported that evaluating candidates on the competency structure, as well as completing the diversity reports and making interview suggestions, often cause bottlenecks. Additionally, four of six TAS reported delays in obtaining the OEEO concur-to-hire date.

Additionally, 12 of 21 hiring managers reported experiencing longer-than-expected delays between milestones. Multiple hiring managers reported experiencing multi-month-long waiting times between position request and being assigned a Talent Acquisition Specialist, as well as delays assigning SME's, scheduling interviews with candidates, delays obtaining OEEO concur-to-hire, and delays making the offer to the selected candidate.

According to HR's Standard Recruitment and Selection Timeline, the process should take 12 weeks, or around 90 calendar days, beginning when the requisition is created and approved to fill. In contrast, according to the SHRM, the average time-to-fill for non-executive public sector positions is 66 calendar days, while the average time-to-fill for non-executive employees in large organizations

⁹ NeoGov Entry Date is used as a proxy for the requisition date and the date a position was assigned to a TAS because HR is not tracking either the requisition or assignment dates.

¹⁰ TAS/Hiring Manager Kickoff Meeting dates are missing for nine of 25 sampled positions.

¹¹ OEEO Concur-to-Hire dates are missing for four of 25 sampled positions.

¹² Offer Accepted dates are missing for nine of 25 sampled positions.

(4,999 or fewer employees) takes an average of 62 days, while extra-large organizations (5000+ employees) takes an average of 69 calendar days (Table 1).

While the recruitment and selection data is missing several key dates, the following causes contributed most to positions surpassing the 90-day target:

1. The average amount of time elapsed between NeoGov Position Entry and Start of Job Advertisement is 81 days. During interviews, TAS and hiring managers both stated that the period between these two milestones is “dead time,” meaning that little to no progress is made on the requisition (job descriptions, minimum qualifications, etc.)
2. Among the 25 positions in Sample C, the average amount of time elapsed between the Selection Interview and Offer Extended is 130 days.
3. HR does not systematically collect or analyze data, which prevents the department from comparing individual recruitments or aggregate data against industry benchmarks and proactively identifying and correcting process bottlenecks.

When positions are vacant past the 90-day target, it becomes more likely that essential services are not being completed at the Council, or that existing staff must allocate their time to cover the duties of the position. When work is not being performed, there are safety, legal, financial, and compliance risks. For example, during an interview, one hiring manager stated that the position was supposed to complete a federally required grant report, but because the position was vacant for so many months, another member of the department had to write the report, which was almost late. For candidates, long wait times increase the likelihood they will drop out of the process. Without monitoring the hiring process, HR cannot proactively identify gaps or appropriately allocate its resources.

Recommendation:

1. HR should compare the length of time elapsed between milestones to industry benchmarks and set a target for overall time-to-fill for continuous improvement.

Management Response: Agree. We have a chart showing target time between milestones which is included in the appendix and is shared with hiring managers during the intake meeting with the Talent Acquisition Specialist.

HR and OEEO are in the process of reviewing and updating the AAP. HR and OEEO are in agreement of the start/end recruitment timelines.

The SHRM timeline cited in the audit, while a good resource, is not directly comparable to the Council’s hiring process. For example, the SHRM timeline doesn’t account for department or position changes when vacancies occur. It does not account for the level of the position that was vacated. They only have one interview versus two interviews at the Council. They only have one reviewer of applications, and we have two reviewers. They also do not account for assessments, physicals and drug and alcohol screening.

SHRM data on hiring and employment trends is reliant upon surveys sent and completed by members. Their report is from 2300-member (across all industries and employer sizes) responses. According to NEOGOV’s research on public sector hiring timelines, whose data is gathered from 3,000+ government organizations, their findings show the average time to hire is 119 days, or nearly four months. The timeline we have established is 13 weeks.

Public sector recruitment processes are lengthier than those in the private sector as the public sector processes are highly structured, multi-step processes that must be followed (screening, veteran preference points, panel interviews, selection interviews, background checks) and union posting and seniority requirements can limit flexibility.

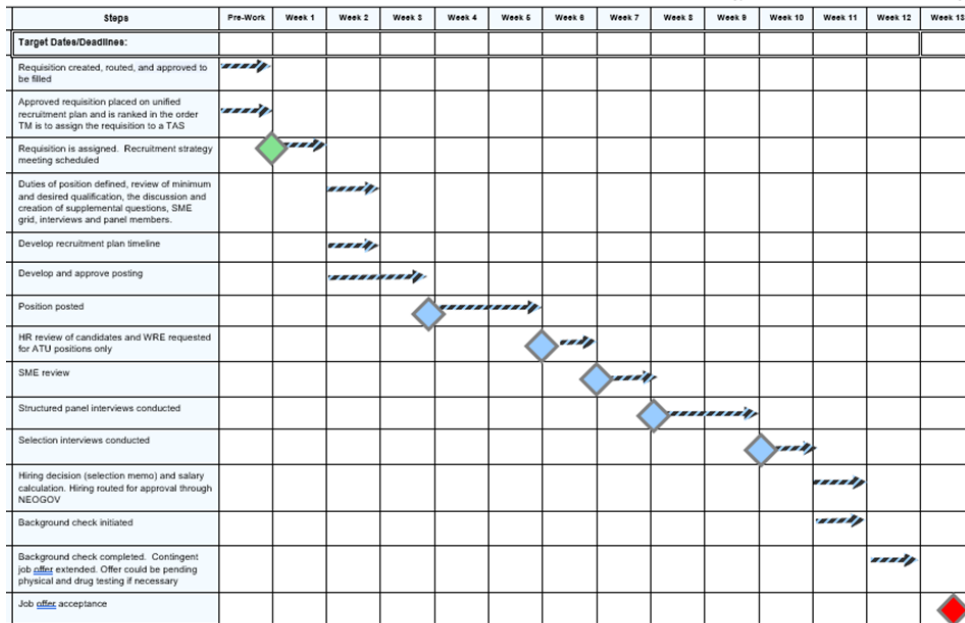
Timetable: Targets are set and HR leadership is monitoring performance. In addition, Talent Acquisition Specialists work with hiring managers to keep the process on track. They escalate delays to their HR Manager, the Senior Manager Talent Management, and the HR Director if necessary. Audit could retest based upon comprehensive updated tracking metrics beginning in March 2027. At this time we should have sufficient data for review.

Staff Responsible: Oversight of the implementation of this recommendation will be conducted by the Senior Manager Talent Management.



Recruitment and Selection Process Timeline

Typical recruitment timeline to fill one vacancy



This does not include continuous job postings, multiple vacancies or multiple requisitions attached to a recruitment, positions that have an assessment test, require CJIS or DOT background check, or senior management or executive positions.

Audit Follow-Up: Confirmation and retest.

- HR should assess the recruitment and selection milestones that are causing the most significant bottlenecks, and align or allocate resources, or combine or eliminate steps to address areas causing the greatest delay.

Management Response: Agree. HR is monitoring the steps and reaching out to hiring managers who are stuck in the process to move them along. In addition, we will consider cancelling requisitions that are making no progress and have cancelled several recently. Ongoing delays are analyzed and escalated to leaders for review. HR leadership is following up with Talent Acquisition Specialist on delays and working on process improvements for problem areas that are taking longer to complete than timeline guidelines.

At the end of February, we created a recruitment and selection agreement whereby the hiring manager and Talent Acquisition Specialist will set agreed upon timelines designating dates each recruitment activity is to be completed at the initial exam planning meeting. This agreement will be managed by the Talent Acquisition Specialist and their manager. Information listed within the Agreement will be manually entered into an excel spreadsheet by the TM HR Managers once the recruitment has been completed.

Timetable: The recruitment and selection agreement will begin with requisitions assigned starting March 9, 2026. Audit could the spreadsheet data in March 2027. At this time we should have sufficient data for review.

Staff Responsible: Oversight of the implementation of this recommendation will be conducted by the Senior Manager Talent Management.

Recruitment and Selection Agreement				
Requisition number		Date of final approval of requisition		Date requisition is assigned
Council job title and working job title if different than Council job title				
Talent Acquisition Specialist				
Hiring manager and department				Division
Recruitment strategy meeting date		Agreement sent to hiring manager:		
	Proposed date to be completed	Adjusted date due to delays	Actual date step was completed	Comments
1. Job announcement finalized				
2. Job announcement posted				
3. SME grid				
a) draft sent to hiring manager				
b) finalized				
4. HR Review of candidates				
a) HR begins reviewing applications				
b) HR review is completed				
5. WRE (ATU positions only)				
a) first WRE request sent				
b) date received last WRE				
6. SME Review				
a) applications sent to SMEs				
b) completed SME grid received				
7. Interview questions				
a) draft sent				
b) finalized				
8. Structured panel interview				
a) date interviews will begin				
b) date of last interview				
9. Selection interview				
a) selection interviews begin				
b) last selection interview				
10. Hiring justification received from hiring manager				
11. Background check				
a) Initiated by TAS				
b) Approved by TAS and HR Mgr				
12. Salary Analysis				
a) start salary analysis for selected candidate				
b) salary analysis approved				
13. Job offer				
a) Offer extended to candidate				
b) Offer accepted by the candidate				
14. Physical and/or drug test				
a) scheduled date				
b) results received				
15. Job confirmation letter sent				
16. Start date				

Send the agreement a second time to the hiring manager and to your HR Manager once the recruitment has closed.

NOTE: The above 13 week timeline (date position is assigned to job offer/acceptance date) does not include continuous job postings, multiple vacancies or multiple requisitions attached to a recruitment, positions that have an assessment test, require CJS or DOT background check, or senior/executive management positions

Audit Follow-Up: Confirmation.

Observation 3: Controls Not Adequate to Ensure Standardized Compensation Offers

HR does not have adequate controls to ensure that compensation offers are standardized, equitable, and reflective of market conditions and candidate qualifications.

During interviews, TAS stated that the process of calculating an incoming candidate's salary offer is completely manual and can take up to two business days. Additionally, the TAS stated that as part of the analysis, they must compare the incoming candidate's credentials to existing employees completing similar work, to try to avoid pay discrepancies between new and existing employees.

Six of 21 hiring managers reported that they perceived issues with how candidate experience is quantified and weighted during the recruitment and selection process, and 16 of 21 hiring managers reported that they perceived issues with how salary offers are calculated. The feedback included the following:

- The salary analysis methodology is not transparent.
- HR does not consistently give credit for work experience gained in other industries, particularly customer service or management experience.
- HR does not count internship experience that took place outside of the Council, graduate-level teaching, or research positions, which makes it difficult to fill entry-level positions that require advanced degrees to perform job duties.
- Hiring managers do not have input on which internal employees or positions HR compares a candidate to when determining the salary offer.
- Candidates are sometimes brought in at pay rates that are not equitable compared to existing employees with similar qualifications and job duties.

HR is responsible for the salary analysis and salary offer. The Recruitment and Selection Procedure (HR 7-1a) states, "Once a candidate for a position is selected, HR is responsible for making a salary recommendation based upon bargaining unit provisions, internal equity as well as other factors for open range positions, for review by the hiring manager and approval of proper authorities."¹³

Additionally, an internal presentation shared by HR outlines steps that a TAS must take to generate a Salary Recommendation. Steps include running a PeopleSoft query to obtain the salaries of existing employees by grade, using the Experience Calculator spreadsheet that calculates part-time experience into full-time hours, and submitting the salary analysis and recommendation form to the HR Manager for approval. HR could not provide documentation about which types of candidate experiences are considered when formulating the salary offer.

HR is also responsible for ensuring that position classifications are regularly updated. The Position Classification and Evaluation System Procedure (HR 3-1a) states, "To maintain an accurate and appropriate classification system, Class Specifications should be reviewed by management every

¹³ In HR 7-1a, "proper authorities" are those with the appropriate signature authority as detailed in HR 7-1h: Signature Approvals for Employees in the Workplace Procedure.

three years or when a position becomes vacant. Class specifications will be created or updated by HR upon the evaluation of a new or revised position.”

SHRM recommends that organizations define a compensation philosophy that creates a framework for consistency, and is used to “attract, retain, and motivate employees.” According to SHRM, “A well-designed compensation philosophy supports the organization's strategic plan and initiatives, business goals, competitive outlook, operating objectives, and compensation and total reward strategies.” Organizations should ensure that their compensation policy is legally compliant, perceived as fair by employees, and that the organization can effectively communicate the strategy to employees.

Additionally, SHRM published a Pay Equity Toolkit, which recommends that organizations conduct annual pay equity audits by comparing pay across similar roles, considering factors such as experience, education, and performance, and use the results to produce reports highlighting areas of concern and actions for addressing inequities.

Audit identified three control deficiencies that contribute to the lack of standardization of experience and salary offers:

1. HR does not have a defined departmental strategy to guide the recruitment and selection process and could not provide written or verbal detail on any strategic approaches to the process.
2. While HR defines which factors are used to determine a salary offer, there is no policy, procedure, or work instruction that defines the methodology for how these factors are quantified and weighted to determine the salary offer.
3. HR has not been adhering to the job classification review schedule, which requires that all positions Council-wide be reviewed every three years. Rather, positions are reviewed on a case-by-case basis either when the position is being refilled, or when a manager requests a review. This is an open recommendation from the Job Classification Audit, which was completed in 2022.

Without an organization-wide compensation philosophy, or a standardized process for quantifying and weighting candidate experience, HR cannot ensure that employees are being offered equitable compensation offers that align with their credentials and the market value. The lack of transparency in the salary offers process causes candidates, current employees, and hiring managers to lose confidence in HR’s ability to make fair compensation offers to candidates. If applicants perceive that the salary offer does not reflect their qualifications or the marketplace value, they may turn down the position, which increases the length of time the position is left vacant. This creates reputational risk for the Council as a desirable employer, and financial, operational, and compliance risks associated with vacant positions.

If the candidate does accept an offer that is not commensurate with their qualifications, or is not comparable to positions at peer agencies, the candidate may leave the position after a short period of time, causing the business unit to restart the hiring and onboarding processes. If hiring managers perceive that the salary offer does not reflect the marketplace value of the position or the candidate’s qualifications, they will either request a salary equity analysis, or a reclassification of the employee. Both are processes are time-consuming for hiring managers and for HR.

Recommendation:

1. The Metropolitan Council Cabinet should work with HR to define a strategy that guides Council compensation offers.

Management Response: Agree. HR leadership plans to bring forward discussions to the Cabinet regarding the development of an organizational compensation philosophy.

Timetable: Initial conversations are anticipated to begin in Q3.

Staff Responsible: Oversight of the implementation of this recommendation will be conducted by the Senior HR Manager, HRBP/Class and Comp.

Audit Follow-Up: Confirmation.

2. HR should create and document a process that outlines how employee credentials are quantified and weighted in the salary analysis process.

Management Response: Agree. Currently the Talent Acquisition Specialist reviews incumbents with similar experience and education for similar roles in the same grade. They also ask the hiring manager for their recommendations on any comparators. HR is in the process of creating a document outlining the process.

Timetable: Document process by April 15, 2026.

Staff Responsible: Oversight of the implementation of this recommendation will be conducted by the Senior Manager Talent Management. The Senior Manager Talent Management will notify the designated audit representative via email when this has been completed.

Audit Follow-Up: Confirmation.

3. HR should adhere to the classification review schedule and ensure that all Council positions are reviewed on a cyclical basis.

Management Response: Agree. The HR Classification & Compensation team has been identified as the work group having responsibility for the ongoing management and maintenance of job classifications going forward. HR staff have identified job classifications that have not been reviewed within the last three years. A project is underway, with the support of an external vendor, to update the Council's job classification framework and numerous job classifications. One additional outcome of this project will be to identify job classifications that can be inactivated. The project team will also complete an update to an established plan for reviewing classifications so that we maintain compliance with the Council's Position Classification and Evaluation System Procedure HR 3-1a.

Timetable: The project with Korn Ferry is anticipated to wrap up by end of May 2026. Updates to classification specifications are anticipated to be completed by the end of 2026. The maintenance review of classifications will be completed on a three-year review cycle beginning in January 2027.

Staff Responsible: Oversight of the implementation of this recommendation will be conducted by the HR Manager Classification and Compensation.

Audit Follow-Up: Confirmation.

Observation 4: HR and OEEO Do Not Monitor When Protected Groups Withdraw from the Recruitment and Selection Process.

HR and OEEO are not collecting or monitoring data on when federal and state protected groups (women, persons with disabilities, and people of color) withdraw from the recruitment process, which is required by both the State Affirmative Action Plan and the FTA EEO Program.¹⁴

The State Affirmative Action plan states that the Council must “track recruitment, employment and retention data to understand where in the process these protected groups are falling out of the process and develop strategies that impact retention rates of these groups.” Both HR and OEEO are responsible for this tracking. Both plans designate the Chief Human Resources Officer and the Director of OEEO as the roles responsible for the recruitment and selection process. While these plans define what data should be collected and monitored, neither plan prescribes a method for doing so.

By statute, the state affirmative action plan should include the following:¹⁵

- 1) Objectives, goals, and policies.
- 2) Procedures, standards, and assumptions to be used by agencies in the preparation of agency affirmative action plans, including methods by which goals and timetables are established.
- 3) The analysis of separation patterns to determine the impact on protected group members.
- 4) Requirements for annual objectives and submission of affirmative action progress reports from heads of agencies.

The FTA C 4704.1A requires that the EEO program describes “any methods to monitor the EEO components” including dissemination, utilization analysis, identified barriers, and progress of the action plan.

Without quality data, it is impossible to perform meaningful analysis on when protected groups withdraw from the recruitment and selection process. As such, the Council cannot ensure that components of the process are not discriminatory, creating legal, compliance, and reputation risk for the Council. The Council also risks losing the talent of candidates who withdrew from the process prematurely due to discriminatory practices.

¹⁴ OEEO is the department responsible for the final “concur-to-hire step of the recruitment and selection process. This is when OEEO verifies that a selected candidate fulfills an EEO requirement, if applicable to the position. However, beginning in September 2025, the Council and OEEO have been advised to pause all “concur-to-hire” activities by the State. Currently, OEEO is holding off on any reevaluations until further instruction is given by the state.

¹⁵ Minnesota Legislature- Office of the Revisor of Statutes. (2025). 43A19 Affirmative Action. ([Link](#))

The Council previously had federal funding delayed due to non-compliance with federal EEO regulations. Failing to fulfil its obligations to the state and FTA Affirmative Action Plans risks losing funding and other punitive actions.

Recommendation:

1. HR should create and implement a process to collect and analyze data on when candidates withdraw from the recruitment and selection process.

Management Response: Agree. NEOGOV collects this data and HR provides data to OEE0 for positions that have an identified need. OEE0 is responsible for analyzing the data for trends.

The part of the process that TM owns is already being completed. A recruitment report that contains applicant self-disclosed ethnicity/gender/disability status is generated from NEOGOV and is sent to OEE0 at the end of each recruitment process that has an identified need (excluding bus and train operators). OEE0 is responsible for analyzing the data.

Timetable: HR is currently providing the data to OEE0 for requisitions with an identified need. HR will expand the data provided to include all requisitions.

Staff Responsible: Oversight of the implementation of this recommendation will be conducted by the Senior Manager OEE0.

Audit Follow-Up: Confirmation.

Observation 5: HR is Not Sharing Public Data as Part of the Salary Analysis Process

Across all interviews with 21 hiring managers, 16 hiring managers expressed concerns about how salary offers are calculated. Six hiring managers reported concerns about how experience is quantified. Six hiring managers reported a lack of transparency around recruitment and selection processes and data maintained by HR.

HR does not share information with hiring managers that is classified as public information according to Minnesota State Statute. During an interview, one hiring manager stated that when they requested to view which existing Council positions were used as comparators to calculate their candidate's salary offer, they were told by HR to submit a data practices request. During an interview, an HR Senior Manager stated that hiring managers are required to make a data practices request if they want to view comparators' education and experience but would not definitively state that HR treated this type of data as private data.

According to Minnesota Statute 13.43 Personnel Data, the following data is public:

- Employee name
- Employee identification number
- Actual gross salary
- Salary range
- Terms and conditions of employment of employment relationship
- Value and nature of employer paid fringe benefits
- Job title and bargaining unit

- Job description
- Education and training background
- Previous work experience
- Date of first and last employment

HR does not believe information used to calculate salary comparisons (employees' previous job experience, education, etc.) is public data. Additionally, HR is worried about accidentally violating the new Pay History law, which prohibits employers from considering a candidate's salary in the offer process.

Hiring managers may have a business need to view salary comparators. By requiring managers to submit data practices requests for public data, HR adds an unnecessary barrier to accessing public data for legitimate business purposes. If hiring managers are not allowed to verify which existing positions their candidate is being compared to for the purposes of generating a salary offer, the candidate may be offered a salary that does not reflect the job duties of their position.

Additionally, this barrier to sharing public data has contributed to a lack of trust and confidence in the recruitment and selection process Council-wide. It can also contribute to salary inequities, if previous hires with similar qualifications received vastly different offers.

Recommendation:

1. HR and OGC should define what recruitment and selection information hiring managers have a business need to know.

Management Response: Agree. HR and OGC will collaborate to determine what information the hiring manager needs to know.

Timetable: Q2

Staff Responsible: Oversight of the implementation of this recommendation will be conducted by the Senior Manager Talent Management.

Audit Follow-Up: Confirmation.

2. HR should create and implement a process for sharing salary comparator information, such as salary, job, and education history for current employees with hiring managers.

Management Response: Agree. Based on decisions made in recommendation 1, once OGC and HR determine the information the hiring manager has a business need to know, if comparators are determined as need to know, HR will draft a script that will be used by talent acquisition specialists to share salary comparator information with hiring managers. HR will also document the process for how salary service credit offers are made.

Timetable: April 15, 2026.

Staff Responsible: Oversight of the implementation of this recommendation will be conducted by the Senior Manager Talent Management.

Audit Follow-Up: Confirmation.

Conclusions

The recruitment and selection process at the Council is not adequately controlled to ensure that the process is effective, efficient, or equitable. Key processes, such as data entry and analysis, are not adequately controlled to ensure accuracy or completeness of reporting, which has a cascade of effects on HR's ability to monitor, continuously improve, and transparently report on the Council's recruitment and selection process.

Improved transparency and standardization of key components of the recruitment and selection process, such as position time-to-fill, experience quantification, and salary offers will likely improve perception of the process for talent acquisition specialists, hiring managers, and candidates.

Appendix A

Program Evaluation and Audit recommendations are categorized according to how Audit will follow-up on them. The categories are:

- **Retest** — Audit will retest the area using the same or similar procedures after a recommendation has been implemented and sufficient time has passed for the changes to take effect. The retest will take place on a specified timetable. The recommendation will be closed once the change has occurred. A new audit project will be opened for retesting and any new findings will include new recommendations
- **Confirmation** — Audit will confirm that an adequate risk response has been completed on the agreed upon timeline. The recommendation will be closed once the change has taken place.
- **Assess Risk** — Audit will not plan for specific follow up to these recommendations. Audit will discuss the area as part of its annual risk assessment activities and consider future audit work in the area.

Distribution List

All audit reports are reported to the general public and are available on www.metrocouncil.org. This audit report was distributed to the following parties:

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