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**STATE OF HAWAII | KA MOKU'ĀINA O HAWAII**  
**DEPARTMENT OF HUMAN RESOURCES DEVELOPMENT**  
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Statement of  
**BRENNA H. HASHIMOTO**  
Director, Department of Human Resources Development

Before the  
**SENATE COMMITTEE ON LABOR AND TECHNOLOGY**  
Friday, March 17, 2023  
3:00PM  
State Capitol, Conference Room 224

In consideration of  
**HB165 HD1, RELATING TO INTERNAL COMPLAINT PROCEDURES**

Chair Moriwaki, Vice Chair Lee, and the members of the committee.

The Department of Human Resources Development (DHRD) appreciates the intent of HB165, which clarifies internal complaint procedures for civil service positions by requiring a formal complaint be filed within twenty working days. However, we must respectfully oppose this measure.

The Merit Appeals Board (MAB) has jurisdiction over internal complaints regarding recruitment, classification, and other areas that are excluded from the collectively bargained grievance process. Currently, the deadlines for filing an internal complaint, which is the first step of the appeal process, are found in Hawaii Administrative Rules §14-3.01-4 and vary depending on the nature of the complaint. The prescribed deadlines are intended to provide clarity and timely resolution. Additionally, the individuals who are eligible to file internal complaints may or may not be current employees, therefore, mandating a twenty-working day filing deadline would create confusion, ambiguity, and unnecessary delays.

We respectfully request that you defer the measure. Thank you for the opportunity to provide testimony.



**HAWAII GOVERNMENT EMPLOYEES ASSOCIATION**

AFSCME Local 152, AFL-CIO

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The Thirty-Second Legislature, State of Hawaii  
The Senate  
Committee Labor and Technology

Testimony by  
Hawaii Government Employees Association

March 17, 2023

H.B. 165, H.D. 1 — RELATING TO INTERNAL COMPLAINT PROCEDURES

The Hawaii Government Employees Association, AFSCME Local 152, AFL-CIO strongly supports the purpose and intent of H.B. 165, H.D. 1 which clarifies the internal complaint procedures for civil service positions by requiring a formal complaint to be filed within twenty working days.

First and foremost, the amendments proposed in this measure align with the grievance timeline in our respective collective bargaining agreements. By adding consistency to this measure, it provides fairness and uniformity for any civil service employee who may feel compelled to file an internal complaint, regardless of jurisdiction.

Thank you for the opportunity to provide testimony in strong support of H.B. 165, H.D. 1.

Respectfully submitted,

Randy Perreira  
Executive Director