Catalyst for Improving the Environment

Evaluation Report

EPA Needs Better Agency-Wide Controls Over Staff Resources

Report No. 11-P-0136

February 22, 2011

Report Contributors: Chris Baughman

Christine El-Zoghbi

Kate Kimmel Russell Moore Eric Lewis

Elizabeth Grossman

Abbreviations

EPA U.S. Environmental Protection Agency FMFIA Federal Managers' Financial Integrity Act

FTE Full-time equivalent

GAO U.S. Government Accountability Office

LLWP Local-Level Workforce Plan

OARM Office of Administration and Resources Management

OCFO Office of the Chief Financial Officer

OHR Office of Human Resources OIG Office of Inspector General

OMB Office of Management and Budget

ORBIT OCFO Reporting and Business Intelligence Tool



At a Glance

Catalyst for Improving the Environment

Why We Did This Review

Federal law (Title 5 United States Code Section 2301, *Merit System Principles*) intends that the U.S. Environmental Protection Agency (EPA) use its workforce efficiently and effectively. From 1982 to 2010, EPA had a position management program that provided a means to ensure compliance with this intent. We reviewed EPA's position management program to evaluate its effectiveness.

Background

Position management provides the operational linkage between human capital goals and the placement of qualified individuals into authorized positions. Over the last 5 years, EPA has averaged a little over 18,000 positions in its organizational structure. Historically, EPA's personnel strength has remained stable regardless of budget increases or decreases.

For further information, contact our Office of Congressional, Public Affairs and Management at (202) 566-2391.

The full report is at: <u>www.epa.gov/oig/reports/2011/</u> 20110222-11-P-0136.pdf

EPA Needs Better Agency-Wide Controls Over Staff Resources

What We Found

EPA does not enforce a coherent program of position management to assure the efficient and effective use of its workforce. While some organizational elements have independently established programs to control their resources, there is no Agency-wide effort to ensure that personnel are put to the best use. Prior to April 2010, EPA had the *Position Management and Control Manual*, which required an Agency-wide program. However this manual was not enforced and in April 2010 it was cancelled without replacement. According to the cancellation memorandum, the manual was eliminated because Office of Administration and Resources Management (OARM) officials believed EPA had other mechanisms in place to appropriately manage and control its positions. However, the other mechanisms do not provide similar effects, controls, or documentation. Without an Agency-wide position management program, EPA leadership lacks reasonable assurance that it is using personnel in an effective and efficient manner to achieve mission results.

What We Recommend

We recommend that the Assistant Administrator for Administration and Resources Management establish an Agency-wide workforce program that includes controls to ensure regular reviews of positions for efficiency, effectiveness, and mission accomplishment.

The Assistant Administrator for Administration and Resources Management neither agreed nor disagreed with the recommendation in his comments. However, the refined local-level workforce plan process could be responsive if EPA established effective oversight and accountability for it. The Deputy Director, Office of Human Resources, stated the Agency would ensure that program and regional offices prepared the local-level workforce plans for use in the budget process. However, OARM did not have the authority to require the program and regional offices to make any staffing changes based upon the results of the local-level workforce plans. OARM does not currently provide the information to the Administrator for decisionmaking purposes, but will provide it if requested. Adequate Agency management controls should ensure the timely and thorough completion of the plans by each regional and program office, and timely distribution to the Administrator and Deputy Administrator to determine whether staffing changes are necessary. The recommendation is unresolved pending the Agency's 90-day response.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

THE INSPECTOR GENERAL

February 22, 2011

MEMORANDUM

SUBJECT: EPA Needs Better Agency-Wide Controls Over Staff Resources

Report No. 11-P-0136

Arthur A. Elkins, Jr. July G. Pland,
Inspector General FROM:

TO: Craig E. Hooks, Assistant Administrator

Office of Administration and Resources Management

This is our report on the subject evaluation conducted by the Office of Inspector General (OIG) of the U.S. Environmental Protection Agency (EPA). This report contains findings that describe the problems the OIG has identified and corrective actions the OIG recommends. This report represents the opinion of the OIG and does not necessarily represent the final EPA position. Final determinations on matters in this report will be made by EPA managers in accordance with established audit resolution procedures.

The estimated cost of this report, calculated by multiplying the project's staff days and expenses by the applicable daily full cost billing rates in effect at the time, is \$459,017.

Action Required

In accordance with EPA Manual 2750, you are required to provide a written response to this report within 90 calendar days. Please consider our response to your comments and provide a final response, with milestone dates as appropriate. Your response will be posted on the OIG's public website, along with our memorandum commenting on your response. Your response should be provided as an Adobe PDF file that complies with the accessibility requirements of section 508 of the Rehabilitation Act of 1973, as amended. The final response should not contain data that you do not want to be released to the public; if your response contains such data, you should identify the data for redaction or removal. We have no objections to the further release of this report to the public. We will post this report to our website at http://www.epa.gov/oig.

If you or your staff have any questions regarding this report, please contact Wade Najjum at 202-566-0832 or najjum.wade@epa.gov, or Eric Lewis at 202-566-2664 or lewis.eric@epa.gov.

Table of Contents

Cha	apters	
1	Introduction	1
	Purpose Background Scope and Methodology	1 1 3
2	EPA Should Strengthen Controls for Managing Its Workforce	5
	EPA Has No Functioning Agency-Level Position Management Program EPA Cancelled Its Position Management Directive Noteworthy Management Practices Not Incorporated at Agency Level Conclusion Recommendation	5 7 8 9 9
S	tatus of Recommendations and Potential Monetary Benefits	11
Ap	pendices	
Α	Prior OIG Reports Identifying Position Management Problems	12
В	OIG-Identified Management Practices Supporting Position Management	16
С	Agency Response to Draft Report	17
_	Distribution	20

Chapter 1 Introduction

Purpose

A position is defined as the duties and responsibilities that constitute the work performed by an employee. Position management provides the operational linkage between human capital goals and the placement of qualified individuals into authorized positions. The U.S. Environmental Protection Agency (EPA) Office of Inspector General (OIG) reviewed EPA's position management program with the objective of evaluating the program's effectiveness.

Background

Historically, EPA's personnel strength has remained stable regardless of budget increases or decreases. As shown in Table 1, there was a substantial increase in the enacted budget for fiscal year 2010 without a similar increase in full-time equivalents (FTEs). FTEs are calculated by dividing the number of hours worked by the number of compensable hours in the year. The number of EPA positions (i.e., employees) is generally over 18,000. Because some employees work part-time, or for only part of a year, the FTEs are less than the number of employees.

Table 1: Enacted Budgets, FTEs, and Number of Employees, Fiscal Years 2006-2010

	•	• •	
Fiscal Year	Enacted Budgets (in billions)	FTEs	Number of Employees at Start of Fiscal Year
2006	\$7.7	17,631	18,461
2007	7.7	17,560	18,327
2008	7.5	17,324	18,109
2009	7.6	17,252	18,306
2010	10.3	17,417 (est.)	18,518

Source: Fiscal 2011 EPA Budget in Brief for the FTEs and enacted budget amounts; OHR for the number of employees.

Federal Requirements

Federal law (Title 5 United States Code Section 2301, *Merit System Principles*) intends that the federal work force be used efficiently and effectively. The Office of Personnel Management provides government-wide leadership and direction in managing the federal workforce. In the August 2009 version of its *Introduction to the Position Classification Standards*, the Office of Personnel Management defines good position management as a carefully designed organization structure that blends the skills and assignments of employees with the goal of successfully carrying out the organization's mission. A carefully designed position structure will result in reasonable and supportable grade levels. Managers and supervisors

are responsible for assuring a sound position structure in the organizations they lead. Achieving an economical and effective position structure is critical to the proper and responsible use of limited financial and personnel resources.

Agency Implementation

EPA's most recent Agency-wide directive on position management was the January 1982 *Position Management and Control Manual*, or the 3150 Manual. It stated that position management is the process by which duties and responsibilities are grouped to form positions, and positions are grouped to form organizations. The intent of position management is to accomplish the assigned mission as effectively and economically as possible. The 3150 Manual designated the Assistant Administrator for Administration (now the Assistant Administrator for Administration and Resources Management) as the EPA position management officer responsible for:

- Providing guidance in the effective conduct of the position management program
- Evaluating management attention to the position management program
- Reporting on the effectiveness of the position management program to the Administrator

The 3150 Manual identified numerous objectives, or benefits, of using position management principles. The first of these was establishing a minimum number of positions to accomplish the Agency's mission; the second was achieving a minimum total cost for all positions. The 3150 Manual provided criteria to determine the need for first-line supervisory positions; second-line supervisory positions; deputy positions; and special positions such as associate, assistant, special assistant, and similar staff positions. In addition, among other things, it required:

- An annual review (and related certification) of the need for all positions
- A review of each vacant position and a determination as to whether duties may be reassigned or the position may be abolished without seriously affecting the execution of essential functions
- A review of position structures at least annually for need of each position and conformance to policy objective
- Position management training for all supervisors as part of, or as a supplement to, the training required for all first-line supervisors

The Associate Director of the Office of Human Resources (OHR) within the Office of Administration and Resources Management (OARM) told the OIG at the beginning of the field work for this assignment that OARM had decided to cancel the 3150 Manual. Before doing so, OHR had analyzed the manual to determine what elements might be useful for a future order addressing position management. Despite several requests from the OIG, OARM never produced this

analysis. In a memorandum dated April 2, 2010, the Acting Director, OHR, canceled the 3150 Manual. According to this memorandum, EPA had other mechanisms in place to appropriately manage and control its positions; OHR could not see any operational or policy barriers to eliminating it. On June 11, 2010, OARM confirmed to the OIG that it did not have the analysis determining elements for inclusion in a future order. (See Scope and Methodology section for the related scope impairment statement.)

Related Internal Control Requirements

Besides the requirements specific to position management that were in the 3150 Manual, EPA must comply with a variety of more general requirements about internal controls. These include:

- Federal Managers' Financial Integrity Act (FMFIA) requires agencies to establish internal accounting and administrative controls that comply with standards established by the Comptroller General. It also requires an annual evaluation (and related statement) on whether the agency's internal controls comply with specified standards and, if not, requires the agency to identify material weaknesses and plans to correct them.
- Office of Management and Budget (OMB) Circular A-123, Management's Responsibility for Internal Control, implements FMFIA. OMB Circular A-123 states that the internal control activities developed and maintained by management must comply with standards related to control environment, risk assessment, control activities, information and communication, and monitoring. Additionally, it specifies requirements for conducting assessments of internal controls.
- EPA Records Management Policy (CIO 2155.1) implements the Federal Records Act of 1950, which requires all federal agencies to make and preserve records that document their organization, function, policies, decisions, procedures, and essential transactions. These records are public property and must be managed according to applicable laws and regulations. Thus, among other things, EPA must create, receive, and maintain official records providing adequate and proper evidence of Agency activities. Such records would include documentation of position management program activities.

Scope and Methodology

We conducted this review from December 2009 through August 2010. We conducted our work in accordance with generally accepted government auditing standards issued by the Comptroller General of the United States. Those standards require that we plan and perform the review to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on

our objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our objectives. We assessed internal controls in EPA over position management.

We interviewed employees from each EPA regional and program office about their organizations' position management programs and activities. We also requested, obtained, and reviewed related documentation, as needed. We interviewed staff in OARM about activities related to managing positions EPA-wide, other activities that might address position management requirements, and information systems. We also interviewed staff from the Office of the Chief Financial Officer (OCFO) concerning financial activities and information systems.

In addition to the interviews, we reviewed various EPA criteria, background, and guidance documents; position management guidance of other federal organizations; files on EPA reorganizations from 2006 to the present; and recently issued OIG reports for position management implications. We obtained EPA information (which we did not verify) related to budgets, costs, FTEs, employee appointments, and number of employees; and we examined various EPA information systems.

Scope Impairment

We had a scope impairment for this project because the Agency failed to respond to the OIG's request for information in a timely manner. Specifically, during the entrance conference on April 8, 2010, the OIG requested a copy of the analysis that the Agency stated that it had conducted to assess which elements of the 3150 Manual might be useful for a future Agency order addressing position management. After several additional requests from the OIG, the Agency reported on June 11, 2010, that it did not have the analysis.

Prior OIG Reports

In the last 2 years, the OIG issued 12 reports that identified problems with matching EPA staff to the work performed. In three cases, the OIG found that EPA had not assigned the appropriate number of staff. In eight cases, the OIG found that EPA had assigned staff that needed different skills or better training. In one case, the OIG found that EPA had not appropriately assigned responsibilities. Details on these reports are in appendix A.

Chapter 2 EPA Should Strengthen Controls for Managing Its Workforce

EPA does not enforce a coherent program of position management to assure the efficient and effective use of its workforce. While some organizational elements have independently established programs to control their resources, there is no Agency-wide effort. Prior to April 2010, EPA had the *Position Management and Control Manual*, which required an Agency-wide program. However, this manual was not enforced and in April 2010 it was cancelled without replacement. According to the cancellation memorandum, the manual was eliminated because OARM officials believed EPA had other mechanisms in place to appropriately manage and control its positions. However, the other mechanisms do not provide similar effects, controls, or documentation. Without an Agency-wide position management program, EPA leadership lacks reasonable assurance that it is using personnel in an effective and efficient manner to achieve mission results.

EPA Has No Functioning Agency-Level Position Management Program

EPA has no Agency-wide program to manage its positions. Some of the 22 program offices and regions surveyed performed some activities to manage their positions. However, the nature of these activities and a consistent lack of documentation did not provide sufficient evidence that positions were efficiently and effectively managed in a consistent manner throughout the Agency.

While it was in effect, the 3150 Manual was not enforced at the Agency level. The 3150 Manual designated the Assistant Administrator, OARM, as the Agency Position Management Officer, responsible for providing guidance on the effective conduct of the position management program, evaluating management attention to position management, and reporting on the effectiveness of the position management program to the Administrator.

OARM did not perform any of these required activities. OARM had not performed Agency-wide annual reviews to determine whether it had the right employees in terms of both number and skill sets to accomplish the mission, given budget constraints. Additionally, OARM did not require regions and program offices to conduct an annual certification of the need for their positions as required in the 3150 Manual. This certification would provide OARM with documentation that managers deemed all positions under their purview to be necessary for mission completion.

Because OARM did not enforce or comply with the 3150 Manual, most EPA regions and program offices had limited and varying approaches to position management. Generally, regional and program office human resource representatives told the OIG that they managed positions based on FTE allocation and payroll budget, or as part of hiring and reorganization processes. These activities cover some aspects of position management, but do not meet the intent of the 3150 Manual. For example, most regional and program offices told the OIG that when a position was left vacant, they evaluated whether the position should be filled again and, if so, at what grade level.

Hiring and reorganization policies and procedures support some of the policy goals identified in the 3150 Manual. Offices at EPA must complete a reorganization packet if they wish to change their office's organizational structure. Included in this packet are proposed staffing plans and organization charts. However, hiring and reorganization affect only a limited number of EPA positions each year. For example, in Fiscal Year 2009, about 11 percent of positions were impacted by reorganizations and 5 percent by hiring. That left significant portions of EPA positions without regular review or management.

Additionally, few program or regional offices maintained records of their limited position management activities. For example, 11 of 22 offices claimed to have procedures to ensure the effective and economic use of their staff. Of those 11, only 5 could produce documentation of procedures and adherence to them. Documenting Agency activities is required under the EPA Records Management Policy.

There was also limited enforcement of other Agency activities that are associated with position management. The Acting Deputy Director, OHR, noted that the "14/15 ceiling," an OCFO-directed cap on the number of GS-14 and GS-15 level employees that each organization can hire, drives position management. However, this driver of position management is unevenly and sometimes not at all applied across EPA offices. Some regions and program offices operated under a set 14/15 ceiling, while others believed their organization had no such ceiling.

In interviews conducted by the OIG, the Acting Deputy Director, OHR, expressed reluctance to establish a centralized control structure over Agency-level human resources programs like position management. Instead, the OHR Shared Service Center liaison described OARM's role in position management as advisory and consultative. Further, the Acting Deputy Director and Shared Service Center liaison, OHR, considered the position management program obsolete, overtaken by more current initiatives on human capital.

Limited and varying position management activities that generally lack documentation constitute a weak control environment contrary to the intent of FMFIA and OMB Circular A-123. The Agency's weak control environment for position management does not provide a reasonable assurance that EPA staff resources are being effectively managed.

EPA Cancelled Its Position Management Directive

On April 2, 2010, EPA cancelled the 3150 Manual, its written procedure on managing the workforce to accomplish the assigned mission as effectively and economically as possible. OARM staff believed position management was adequately addressed by other activities. However, the basis for that belief is undocumented.

On December 2, 2009, the Acting Deputy Director, OHR, stated that the FTE allocation process, workforce planning, and classification are the three parts of position management. However, EPA's cancellation order, signed by the Acting Director, OHR, stated that OHR staff believed budgeting, strategic workforce planning, and strategic succession planning mechanisms allow it to appropriately manage and control positions. Further, OARM did not provide analysis or documentation of how these mechanisms allow it to appropriately manage and control positions. As described below, alternate activities do not provide similar effects, controls, or documentation as those provided by the process required by the 3150 Manual, or provide assurance that the workforce is being used efficiently and effectively.

Budgeting. The primary link between the budget process and position management is FTE allocation and the associated payroll limits for each office. OCFO sets FTE ceilings internally for each of the program and regional offices according to past FTE use and any shifts in program needs indicated by the national program managers. After funds are appropriated, FTE allocations are distributed to individual program and regional offices. Each office then allocates the FTEs within its organization. Our evaluation showed no appreciable link between this process and a review of positions for efficiency, effectiveness, and mission accomplishment. By her approval of the EPA 3150 cancellation memorandum, the Acting Director, OHR, contended that budgeting allows EPA to appropriately manage and control positions. However, budgeting processes only provide controls to maintain fiscal restraint rather than an active management of positions and staff resources. In other words, staying within specified budget targets does not necessarily ensure effective and efficient use of personnel.

Workforce planning. EPA's workforce planning is composed of four primary elements: (1) demand, i.e., staff needed; (2) supply inventory, i.e., staff available; (3) gap analysis, i.e., the difference between the demand and supply; and (4) strategies and solutions. EPA's latest *Strategic Workforce Plan* was written in 2006. It analyzed projected workforce trends through 2008. The Agency's intention was to update the plan during fiscal year 2007; as of June 2010, it had not been updated. Furthermore, although strategic workforce planning addresses development of the workforce, it does not ensure the effective and economic use of personnel. Therefore, while workforce planning theoretically allows EPA to plan for positions, the *Strategic Workforce Plan* does not assure that the workforce is being managed efficiently and effectively.

Succession planning. EPA's strategic succession planning is focused on developing leadership in the Agency in the face of an aging workforce. This goal is designed to help ensure future staffing of key positions. However, EPA's most recent succession plan, *EPA's Plan for Strategic Leadership Succession* 2006/2007, addresses none of the goals or processes of a position management program. By approving the EPA 3150 cancellation memorandum, the Acting Director, OHR, claimed that succession planning allows the Agency to appropriately manage and control positions. However, we determined that the contribution of succession planning to the effective and efficient use of staff resources is minimal.

EPA cannot effectively manage staff resources without guidance and controls. In 2009, the U.S. Government Accountability Office (GAO) made the following observation:

EPA has struggled for several years to identify its needs for human resources and to deploy its staff throughout the country in a manner that would do the most good. We found that EPA's process for budgeting and allocating resources does not fully consider the agency's current workload, and that in preparing requests for funding and staffing, EPA makes incremental adjustments, largely based on an antiquated workforce planning system that does not reflect a bottom-up review of the nature or distribution of the current workload.

GAO further concluded that staffing at regional offices has been "driven primarily by historical staffing patterns rather than a fresh assessment of regional needs." In response to calls from GAO and the union to conduct a workforce analysis, the former Deputy Assistant Administrator, OARM, stated that EPA's workforce would probably not grow significantly over the next few years, but the Agency will reshape the workforce as new environmental issues arise. She acknowledged that the Agency should look for better ways to manage staff. These statements reinforce the need for a viable Agency-level position management program. Other federal organizations enforce their position management programs and the Office of Personnel Management advocates such programs.

Noteworthy Management Practices Not Incorporated at Agency Level

There are some position management activities among the regional offices that the OIG thought demonstrated good management practices (appendix B). Regions 1 and 10 both maintain strong position management programs, including published guidance, position management training for supervisors, and documentation of position management activities. These programs help Regions 1 and 10 managers allocate staff for effective use. Some offices have developed

11-P-0136 8

.

¹ GAO Report GAO-09-434, ENVIRONMENTAL PROTECTION AGENCY Major Management Challenges, March 2009

unique, stand-alone information management systems to assist them in tracking and understanding their positions. However, these management practices have not been incorporated into an effective Agency-level position management program.

Conclusion

EPA lacks reasonable assurance that program and regional offices are employing their staff resources effectively and efficiently. Effective resource management is essential to accomplish EPA's mission to protect human health and the environment. EPA lacks an Agency-level program for effectively managing positions to assist in accomplishing its strategic goals and initiatives. Managing positions in a coherent and consistent program would provide EPA leadership with the tools it needs to make informed decisions about staff resources. Such a program would also assure Agency management that the workforce was used efficiently and effectively.

Recommendation

We recommend that the Assistant Administrator for Administration and Resources Management:

1. Establish an Agency-wide workforce program that includes controls to ensure regular reviews of positions for efficiency, effectiveness, and mission accomplishment.

Agency Comments and OIG Evaluation

In the December 30, 2010, response to the draft report (which is attached as appendix C), the Assistant Administrator for Administration and Resources Management did not state whether he agreed or disagreed with our recommendation. During the exit conference, the Deputy Director, OHR, said the Agency agreed with the intent of the recommendation, but did not agree with our proposed implementation. The OIG recommendation did not include an implementation plan.

The OARM response asserted that the following OHR initiatives, in concert with the budget process, would achieve the intent of our recommendation:

- Updated local-level workforce plans (LLWPs) and a refined LLWP process.
- A section of EPA's Strategic Plan for fiscal years 2011–2015, "Strengthening EPA's Workforce Capabilities."
- Guidance (currently under development) for program and regional offices documenting the key roles and responsibilities in the position classification process.

Of the three initiatives offered, the proposed LLWP process has the potential to be responsive to our recommendation if implemented effectively. The 2006 memorandum transmitting the Strategic Workforce Plan noted that the LLWP will be used by EPA leaders to:

- Direct their human resources to properly align with EPA goals;
- Conduct analyses to ensure the organization is appropriately structured;
- Use recruitment, development and other workforce strategies to address needs; and
- Ensure their workforce activities lead to successful accomplishment of EPA's mission.

We reviewed EPA's LLWP process. As implemented, it did not adequately ensure regular reviews of positions for efficiency, effectiveness, and mission accomplishment across EPA. Before 2009, OHR's Office of Human Capital Planning requested that regional and program offices submit LLWPs to their office. They received LLWPs from about half of the offices. In 2009, the Office of Human Capital Planning changed the process. OHR began providing the regional and program offices with information developed from PeoplePlus for the LLWPs, and asking them to verify the information. During the exit conference, a representative from the Office of Human Capital Planning said that for the next round of data collection, they would be working with regional and program offices to complete LLWPs for use in the budget process.

The LLWP could be a good tool to review positions for efficiency, effectiveness, and mission accomplishment if implemented effectively. However, EPA must establish effective oversight and accountability for the LLWP process at regional and headquarters levels. During the exit conference, the Deputy Director, OHR stated that they would ensure that program and regional offices prepared the local-level workforce plans for use in the budget process. However, OARM did not have the authority to require the program and regional offices to make any staffing changes based upon the results of the local-level workforce plans. We subsequently clarified that OARM does not currently provide the information to the Administrator for decisionmaking purposes, but will provide it if requested. We believe that adequate Agency management controls should ensure the timely and thorough completion of the plans by each regional and program office, and timely distribution to the Administrator and Deputy Administrator to determine whether staffing changes are necessary.

The recommendation is unresolved. We ask management to review and consider our comments in its response to our final report.

Status of Recommendations and Potential Monetary Benefits

RECOMMENDATIONS

POTENTIAL MONETARY BENEFITS (in \$000s)

Rec. No.	Page No.	Subject	Status ¹	Action Official	Planned Completion Date	Claimed Amount	Agreed To Amount
1	9	Establish an Agency-wide workforce program that includes controls to ensure regular reviews of positions for efficiency, effectiveness, and mission accomplishment	U	Assistant Administrator for Administration and Resources Management			

 $^{^{1}\,}$ O = recommendation is open with agreed-to corrective actions pending C = recommendation is closed with all agreed-to actions completed U = recommendation is undecided with resolution efforts in progress

Prior OIG Reports Identifying Position Management Problems

EPA Needs a Coordinated Plan to Oversee Its Toxic Substances Cor Report No. 10-P-0066, February 17, 2010	ntrol Act Responsibilities,
Report Excerpt	OIG Comment
Enforcement resources are not commensurate with the scope of work. The number of inspectors is declining and their allocation is not determined by potential risks. Over the course of the Core Toxic Substances Control Act program, the Office of Enforcement and Compliance Assurance has shifted responsibility for conducting inspections among regions; the Office of Enforcement and Compliance Assurance headquarters; the Core Toxic Substances Control Act Enforcement Center in Denver, Colorado; and combinations thereof. During the last resource shift in 2001, regions were offered the responsibility for ensuring compliance. Only Regions 2, 4, and 5 assumed responsibility for Core Toxic Substances Control Act enforcement, while the Office of Enforcement and Compliance Assurance headquarters and the Core Toxic Substances Control Act Enforcement Center assumed responsibility for the remaining seven regions. This dispersed responsibility has led to an inconsistent approach and process that hinders effective oversight.	The number of staff assigned was not correct.
EPA Can Improve Its Preparation and Use of Independent Governme Superfund Contracts, Report No. 10-P-0065, February 16, 2010	ent Cost Estimates for
Report Excerpt	OIG Comment
Superfund program staff involved in the cost estimating process informed us that training relating to independent government cost estimates has been minimal within the last 10 years. EPA does not have a specific training course for independent government cost estimates. Project Officers receive some independent government cost estimates training as part of their Contracting Officer Representative training. However, independent government cost estimates make up only a few pages of the training text.	The assigned staff needed different or additional skills.

Self-reported Data Unreliable for Assessing EPA's Computer Securit 10-P-0058, February 2, 2010	ty Program, Report No.
Report Excerpt	OIG Comment
Sixty-eight percent of respondents believed they had not been educated on how to fully assess the National Institute of Standards and Technology 800-53 security controls in Automated System Security Evaluation and Remediation Tracking.	The assigned staff needed different or additional skills.
Forty-seven percent of respondents believed more training is needed when EPA introduces newer versions of the Automated System Security Evaluation and Remediation Tracking system.	
EPA Needs to Improve Continuity of Operations Planning, Report No.	o. 10-P-0017, October 27, 2009
Report Excerpt	OIG Comment
EPA's continuity training and exercises do not sufficiently prepare or assess the Agency's ability to provide its essential services during a significant emergency. EPA's training scenarios primarily test equipment, communication systems, and access to records. EPA training scenarios lack a comprehensive focus Few training scenarios required a complete deployment of resources and used minimal staff at the alternative site.	The assigned staff needed different or additional skills.
EPA Needs a Better Strategy to Identify Violations of Section 404 of No. 10-P-0009, October 26, 2009	the Clean Water Act, Report
Report Excerpt	OIG Comment
In part because of its limited field presence, all of the regions interviewed primarily relied on complaints, tips, and referrals to learn about Clean Water Act section 404 violations.	The number of staff assigned was not correct.
EPA's Office of Research and Development Could Better Use the Fe Integrity Act to Improve Operations, Report No. 09-P-0232, September	
Report Excerpt	OIG Comment
Office of Research and Development personnel gain knowledge of FMFIA and internal controls largely through on-the-job-training and did not receive sufficient additional training on evaluating internal controls. Inadequate understanding of the internal control process resulted in the Office of Research and Development relegating FMFIA to a yearly administrative reporting activity. Office of Research and Development managers and staff responsible for FMFIA receive no training on GAO's five internal control standards or how to ensure research programs meet standards.	The assigned staff needed different or additional skills.

EPA Should Use FMFIA to Improve Programmatic Operations, Repo	rt No. 09-P-0203, August 6,
Report Excerpt	OIG Comment
Advisors we interviewed had a range of training experience on FMFIA requirements. The majority of advisors (four of seven) we interviewed believed they could benefit from additional training, especially on internal control standards and programmatic reviews.	The assigned staff needed different or additional skills.
OCFO said its validation strategy does not include validating the content and accuracy of offices' assurance letters To date, OCFO has limited resources to oversee annual FMFIA reporting on programmatic elements, and OCFO considers its staffing levels adequate.	
Steps Taken But More Work Needed to Strengthen Governance, Incr Security Planning for the Exchange Network, Report No. 09-P-0184,	
Report Excerpt	OIG Comment
Office of Environmental Information did not provide documentation to (1) support the existence of a training plan that meets federal policy or guidance, and (2) confirm personnel have been trained on contingency plan responsibilities and procedures within the last 2 years.	The assigned staff needed different or additional skills.
EPA Can Improve Managing of Working Capital Fund Overhead Cos March 30, 2009	ts, Report No. 09-P-0129,
Report Excerpt	OIG Comment
The Office of Technology Operations and Planning's working capital fund staffing process was not fully documented. Office of Technology Operations and Planning management allocates the number of FTEs to working capital fund cost centers based on informal discussions between service managers and working capital fund management during its annual budget formulation process The staffing process is an important element in the working capital fund's control activities; without maintaining documentation explaining the process, the effectiveness of this control activity is reduced.	The number of staff assigned was not correct.
Cost accounting principles require that costs be allocated on a reasonable and consistent basis. We identified three issues relating to unreasonable allocation of working capital fund employee time.	

Clean-ups, Report No. 09-P-0119, March 18, 2009	ore Funds Available for					
Report Excerpt	OIG Comment					
EPA's special accounts management is fragmented among 4 headquarters offices and 10 regional offices. Each of these offices has separate roles and responsibilities, and no one office or managing body is centrally responsible for managing, overseeing, and coordinating special accounts work for these various offices. Headquarters managers believe the regional management of the accounts, in addition to the multiple management guidance documents issued by headquarters offices, is sufficient for managing EPA special accounts. In the past, they questioned the need for a central management structure. Though headquarters offices have jointly issued special accounts guidance, none of the offices has taken the lead or been designated as the central management official to ensure proper management, oversight, and coordination of special accounts work by headquarters and regional offices. Consequently, no single headquarters entity is responsible for the management or oversight of	Responsibility was not properly assigned.					
special accounts. A Region 5 Penalty Reduction Was Unjustified and Undocumented, Report No. 08-P-02						
September 29, 2008	010.0					
Report Excerpt	OIG Comment					
Staff's analysis was never intended to establish Minnesota Metal Finishing Incorporated's ability to pay. An ability-to-pay analysis is a document prepared by a financial expert that determines a financial range a company could pay over a period of time. Office of Regional Counsel staff stated they are not qualified to conduct an ability-to-pay	The assigned staff needed different or additional skills.					
analysis.						
analysis. EPA Personnel Access and Security System Would Benefit from Imp						

OIG-Identified Management Practices Supporting Position Management

Information Available to the Program and Regional Offices: OARM, working with OCFO, recently increased the information readily available to the program and regional offices about their staff. The information comes from PeoplePlus, which is EPA's integrated human resource, benefits, payroll, and time and labor system. With input from representatives of the program and regional offices, the OARM OHR created various standard reports. These reports are periodically sent directly to staff in the program and regional offices. In addition, with help from the OCFO, OARM made PeoplePlus information available for ad hoc reports through the OCFO Reporting and Business Intelligence Tool (ORBIT). Thus, those with access to sensitive ORBIT information can create their own reports from PeoplePlus information.

Region 1 Position Management Program Components: Region 1 has a position management program that includes an Organization and Staffing Plan for each Region 1 office, updated monthly, that includes evaluating vacancies; a Critical Needs Database, which is a system to track personnel actions needed and underway; and centralized approval of hiring actions.

Region 7 Position Management Program Components: Region 7 has a position management program that includes a prioritized list of vacancies to be filled; documented weekly meetings of the senior leadership team; and a spreadsheet to manage positions at the 14 or 15 grade level, which require approval by the Assistant Regional Administrator to fill.

Region 10 Position Management Program Components: Region 10 has a position management program that includes position management plans prepared biennially by each Region 10 office, updated in the interim via a checklist, which includes information on possible staffing changes; evaluation of each vacancy documented via a Strategic Hiring Request; and a Placement of Bodies spreadsheet, matching employees to funding via program results codes.

Region 2 Information System: Region 2 maintains an information system for its approved positions and vacancies.

Region 3 Panel: Region 3 has a panel, the Hiring Safeguards Position Review Panel, to review requests for filling a vacancy, with a form to document its review.

Region 6 Information System: Region 6 maintains an information system used for succession management that includes the skills of its employees.

Agency Response to Draft Report



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

DEC 30 2010

OFFICE OF ADMINISTRATION AND RESOURCES MANAGEMENT

MEMORANDUM

SUBJECT: EPA's Comments on the Office of Inspector General's (OIG) Draft Evaluation

Report, Project No. OPE-FY10-0005, "EPA Needs Better Agency-Wide Controls

Over Staff Resources"

FROM: Craig E. Hooks

Assistant Administrator

TO: Elizabeth Grossman

Deputy Assistant Inspector General for Program Evaluation

Office of Inspector General

I appreciate the opportunity to review and comment on the Office of Inspector General's (OIG) November 1, 2010 draft report entitled: "EPA Needs Better Controls Over Staff Resources" (Project No. OPE-FY10-0005). The Office of Human Resources (OHR) has reviewed the draft as well.

The draft report's recommendation is that the Office of Administration and Resources Management (OARM) establish an "...Agency-wide workforce program that includes controls to ensure regular reviews of positions for efficiency, effectiveness, and mission accomplishment." EPA does maintain a budgeting and workforce management framework at the Agency and program office and regional levels to deploy staff resources efficiently and effectively to achieve EPA's mission. This framework operates under the Agency's strategic plan and is translated into the budget planning, management, and staff oversight functions performed across Agency organizations and management levels. I believe that the Agency continues to strategically, efficiently, and effectively manage its workforce through this EPA program office and regional framework.

Agency management works continuously to improve upon the framework as appropriate. Specifically, the Agency recently refined its local level workforce planning process so that each program and regional office could review the current status of their workforce data, assess attrition/retirement rates across their respective office, and forecast future needs, particularly for Mission Critical Occupations. An example of these updated, local level workforce plans (LLWPs) was shared with the OIG. LLWPs play a significant role in terms of identifying future staffing needs, driving the process for effective position management. The use of LLWPs in conjunction with our current focus on a number of cross-organizational areas defined within the Agency's strategic plan will serve to optimize staff efficiency and effectiveness. These new advances in the Agency's approach to workforce planning superseded the Agency's *Position Management and Control Manual*, finalized in 1982 and little used across Agency offices. In contrast to the Manual, LLWPs and the actions to be taken under the Cross-Cutting Fundamental Strategy "Strengthening EPA's Workforce and Capabilities," found within EPA's Strategic Plan for FY2011-15, will allow each office the flexibility to plan for their own unique, office-specific position needs.

In this regard, I have attached a copy of one of our LLWP templates, as well as the relevant portion of the cross-cutting goals and action plans related to "Strengthening EPA's Workforce and Capabilities." These goals and plans were endorsed by the Administrator's Executive Management Council. In addition, the OHR policy division will be developing guidance for program and regional offices documenting the key roles and responsibilities in the position classification process. These three initiatives represent part of our regular and continuing efforts to enhance the workforce budgeting and management framework referenced earlier.

Thank you for the opportunity to review and comment on this draft report. If you have any questions or need additional information, please contact Kimberly A. Lewis, Director, Office of Human Resources or Susan Kantrowitz, Deputy Director, OHR, at 202-564-4606.

Attachments

2010 LOCAL LEVEL WORKFORCE PLAN OVERVIEW

Workforce planning provides management with a way to align the workforce with a business plan that will address current and future workforce issues. Workforce planning stems from the Agency's strategic plan and human capital goals and profoundly influences organizational performance. Workforce planning helps the EPA better:

- · Project and respond to organization-wide staffing needs
- · Influence training, position management, and hiring goals
- Deploy staff and organize work
- · Manage organizational culture, and
- Anticipate and manage risk.

EPA's strategic workforce planning model uses a four-step process.

1. Supply:

Inventory of the current workforce demographics, onboard numbers of Mission Critical Occupation (MCO) positions, competency assessments, retirement trends, and retirement and attrition projections.

2. Demand:

Identification of demand vulnerabilities required to achieve EPA's mission and goals, now and in the future.

3. Gap Analysis:

Comparison of supply data with demand assessments to determine where mission-critical gaps and surpluses exist now and where they will likely appear in the future.

4. Strategies and Solutions:

Identification and implementation of a range of strategies and solutions (e.g., recruiting, training, re-training, restructuring, and competitive sourcing) to close identified gaps.

OFFICE OF SOLID WASTE & EMERGENCY RESPONSE ANALYSIS

Step 1: Supply

This analysis provides an overview of the human resources supply profile as of March 31, 2010. It includes details on the following staffing demographics: grade; the distribution of staff by gender; the age profile, length of service; educational levels; and the distribution of the workforce across the mission occupational categories. The analysis covers a period of eight plus years from FY 2002 to the first half of FY 2010.

Table 1: EMPLOYEE PROFILE

Analysis: As of March 1, 2010

- OSWER has a total of 576 permanent employees currently, a decreasing trend over the past 5 years (Table 1).
- The average age has increased almost 2 years within the same time frame.
- This age trend is reflected in a significant reduction of employees 40-49 years old and an increase in employees 60+ in age.
- Additionally, the average length of service has increased.

The above trends are an indication of an aging workforce. Additionally, onboard employees are staying longer within the federal service. These conclusions are reflected in the ever increasing population of retirement eligible employees.

Other Indications:

- Gender, Ethnicity, Educational, and Leadership splits have basically remained constant within OSWER.
- OSWER's workforce has changed little outside of age and retirement eligibility

Table 2A and 2B: ONBOARD DATA

Analysis: As of March 1, 2010

Mission Critical Occupations (MCOs) within OSWER.

- Decreasing numbers: Attorneys, Environmental/Mechanical Engineers, Health Scientists, and Leaders.
- Increasing numbers: Biologists, IT Specialists, and Physical Scientists.

The above data indicate a shift in projects and priorities. Your organization may want to examine the reasons for these shifts and determine whether anticipated priorities will further impact the above trends. It will be important to determine if these employment and hiring trends will continue or if there will be a future shift in hiring demand.

Table 3, 4A, and 4B: WORKFORCE AND MCO RETIREMENT ELIGBILITY DATA

Analysis: As of March 1, 2010

- There are a total of 576 permanent employees, 20.8% are currently eligible to retire, an increase of 12.1% from 2002.
- Additionally, the number of employees eligible to retire within a 5-year period increases to 36.8% of the total workforce in 2015.
- Ten years from now in 2020, 55.4% of the workforce will be eligible for retirement.
- A majority of MCOs are showing retirement eligibility rates above the overall rate.
- Currently Attorneys, Chemists, Economists, Leaders, and Toxicologists have a high percentage of retirement eligibility.

The above suggests OSWER has current Knowledge Management, Succession Management, and Skills Retention issues within these specific occupational groups.

Table 5 and 6: PROJECTED RETIREMENT AND ATTRITION DATA

Retirement eligibility is a good measure for understanding the workforce requirements of your program/office. However actual retirements or projected retirements provide a more accurate forecast of your workforce needs. Historical EPA data were used to create a retirement projection model.

Analysis: Retirement Projection Model

- Retirement eligibility will remain around 100 employees, with approximately 22 employees projected to retire every year.
- An additional 15 employees are projected to leave per year based on resignations, federal transfers, deaths and terminations.

Projected annual attrition:

Year	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Actual Hires	48	22	19	15	20	3						
Actual Attrition	30	33	26	43	21	5						
Projected Attrition						37	36	38	38	37	36	35

Other indications:

• Current economic situation may show projections for retirement, transfer, and resignations are high due to a tighter job market and unfavorable retirement conditions.

SURVEY OF WORKFORCE DEMAND, GAP ANALYSIS AND STRATEGIES/SOLUTIONS

STEP 2: Demand – Local Progress and Plans

1. Is the scope of work within	your office changing?	Yes No
a. How is the scope of work cl	hanging?	
Legislative Change New/ Change in Agency P • • • •		siness Reorganization ner (please list)
b. How is the nature of the wo	ork changing?	
New projectsMore complexity●•••	☐ More projects ☐ Less complexity	☐ Fewer projects ☐ Other (please list)
2. How are your employees staworkload?	affing level and skill level neo	eds affected by the change in
☐ Increased Staffing ☐ Higher Skill Level Need ☐ More Administrative	☐ Decreased Staffing ☐ Different Skill Set Need ☐ Less Administrative	Other Staffing Change More Technical Less Technical
a. Are there new positions?		
Increased FTE Fewe	er FTE Same	

b. Are there any reprogramm	ing of positions?	
Attorneys Contract Specialists Grant Specialists IT Specialists Other (please list)	☐ Biologists ☐ Economists ☐ Health Scientists ☐ Physical Scientists	☐ Chemists ☐ EPA Leaders ☐ Human Resources Specialists ☐ Toxicologist
c. What is your general asses current workload?	sment of the appropriat	eness of your existing skill mix given the
Good	☐ Fair	Poor
d. Are different skills sets nee	eded?	☐ Yes ☐ No
e. What skills are needed? • • • • • f. For FY 2010, what occupate • • • •	tions and how many pro	ojected hires are there?
g. In what job categories are	the hires?	
☐ Attorneys ☐ Contract Specialists ☐ Grant Specialists ☐ IT Specialists ☐ Other (please list) • • •	☐ Biologists ☐ Economists ☐ Health Scientists ☐ Physical Scientists	☐ Chemists ☐ EPA Leaders ☐ Human Resources Specialists ☐ Toxicologist

STEP 3: Gap Analysis – Local Progress and Plans:

1. Are there any variables to your specific office for retirement and attrition?
2. Are there any hard to fill positions?
Administrative Clerical MCO Scientific Engineering Other (please list)
a. Are there specific occupational series that are hard to fill or retain? Please list. • • • • •
b. Why are positions hard to fill?
Labor Supply Shortage High Experience Need Competition Other (please list) • • • • • • •
STEP 4: Strategies and Solutions – Local Progress and Plans:
Describe any completed, ongoing, and future strategies to close workforce MCO position gaps and/or competency gaps for current and future mission needs.
Competency Assessment
•



FY 2011-2015 EPA Strategic Plan Cross-Cutting Fundamental Strategy: Strengthening EPA's Workforce and Capabilities

Continuously improve EPA's internal management, encourage innovation and creativity in all aspects of our work, and ensure that EPA is an excellent workplace that attracts and retains a topnotch, diverse workforce, positioned to meet and address the environmental challenges of the 21st century.

Achieving positive environmental and human health outcomes through cleaner and safer air, water, and land, and through protection of our natural resources is the focal point of all our work at EPA. This compelling mission attracts workers eager to make a difference and drives employees across the Agency to work together. EPA fully supports the Administration's efforts to reform the federal government's hiring system to ensure highly qualified individuals are available to strengthen EPA's workforce. EPA believes these reforms will improve the Agency's ability to protect human health and the environment more effectively and efficiently.

EPA is a complex organization. This is both an asset and a challenge. To achieve its mission, EPA is continuously building and nurturing a skilled workforce, finding new ways to use the power of information, working together through enhanced communication, and demanding transparency and accountability at all levels. With innovative and creative management and a talented, diverse, and highly motivated workforce, EPA will be positioned to meet head-on the complex environmental challenges of the present and future.

To achieve this goal, EPA will:

- 1. Recruit, develop, and retain a diverse and creative workforce, equipped with the technical skill and knowledge needed to accomplish the Agency's mission and to meet evolving environmental challenges.
- 2. Cultivate a workplace that values a high quality work life, provides employee-friendly policies and facilities, and invests in the information infrastructure, technology, and security essential to support a mobile workforce.
- 3. Practice outstanding resource stewardship to ensure that all Agency programs operate with fiscal responsibility and management integrity, are efficiently and consistently delivered nationwide, and demonstrate results.
- 4. Take advantage of existing and emerging tools to improve and enhance communication, transparency, and accountability.
- 5. Integrate energy efficiency and environmental considerations into our work practices as core components of Agency business models and operations.

6. Improve the effectiveness and efficiency of the Agency's acquisition function by strengthening requirements development, contract management, and internal review practices; maximizing the use of competition in contracting, reducing high-risk contracts; improving how contracts are structured; building the skills of the acquisition workforce; and improving management of the EPA acquisition workforce.

FY 2011 Action Plan: Strengthening EPA's Workforce and Capabilities

This Action Plan lists the specific actions that EPA will carry out in FY 2011 to achieve the goals of the Strategy for Strengthening EPA's Workforce and Capabilities as described in the FY 2011-2015 EPA Strategic Plan. Annual Action Plans will be developed for each year of the Strategic Plan.

- 1. Reform EPA's hiring process to make it easier for applicants to apply for jobs, increase the pool of qualified candidates, and reduce hiring time. New hires report increased satisfaction with the hiring process, and EPA hiring officials report increased satisfaction with the quality and number of candidates referred for consideration (Supports Principle 1).
 - Convene cross-Agency taskforce to provide advice regarding performance of EPA's Human Resources Shared Service Centers (by November 2010).
 - Complete standardized recruitment packages for 10 occupations for customer use (by December 2010).
- 2. Attract a diverse pool of applicants for EPA jobs, including increased representation from minority, veteran, women, and disabled populations (Supports Principle 1).
 - Launch the Diversity Dashboard, an internal database capable of providing snapshots of EPA employment data (by December 2010).
 - Conduct training for hiring officials in all EPA regions and program offices on targeted outreach strategies and the use of social media tools to attract qualified, diverse applicants (by March 2011).
- 3. Enhance the capability of telework-eligible EPA employees to work remotely and increase the number of EPA employees who telework and/or the number of hours teleworked by 10 percent (Supports Principle 2).
 - Use results from the EPA Telework Study (includes regional approaches, best practices, and technology options) to inform the EPA policy approach to telework (by December 2010).
 - Train 100 percent of managers and supervisors in the training course, "Telework: A Manager's Perspective" (by March 2011).
 - Launch the enhanced Employee Portal to support employee remote access to specific EPA applications and systems. Track usage to build baseline data for measuring usage rates in future years (by April 2011).
- 4. Improve the on-boarding experience for new hires, expand opportunities for management and staff for ongoing development, and foster increased collaboration as One EPA (Supports Principles 1 and 2).
 - Identify and implement on-boarding "best practices," including integration of technologies such as social networking. Achieve improved employee satisfaction scores on the FY 2011 federal Employee Viewpoint Survey (EVS).

- Investigate and prepare options for expanding the Leadership Development and Professional Rotational Program to include potential rotations/details to employees in the "professional-technical" career track (by March 2011).
- 5. Practice outstanding resource stewardship and ensure maximum use of Agency funds by reducing unliquidated obligations in expired grants and contracts. Reduce unliquidated obligations in expired grants by 15 percent and in expired contracts by 20 percent by the end of FY 2011 (Supports Principle 3).
 - Review 100 percent of unliquidated obligations recorded on or before March 31, 2011 by June 30, 2011 or per EPA guidance.
- 6. Utilize existing and emerging tools to support the President's focus on Open Government and provide a way for the diverse community of scientists, researchers, and professionals to connect, communicate, and share ideas (Supports Principle 4).
 - Launch EPA's internal professional networking and collaboration site for EPA employees (by September 2011).
- 7. Increase use of Green Conferencing and Green Meeting practices (Supports Principle 5).
 - Measure the use of video conference equipment to establish an FY 2011 baseline against which to track future usage (by September 2011).

Appendix D

Distribution

Office of the Administrator
Deputy Administrator
Assistant Administrator for Administration and Resources Management
Agency Followup Official (the CFO)
Agency Followup Coordinator
General Counsel
Associate Administrator for Congressional and Intergovernmental Relations
Associate Administrator for External Affairs and Environmental Education
Director, Office of Regional Operations
Audit Followup Coordinator, Office of Administration and Resources Management